

Health and Safety Manual 2025

GAZZOLA PAVING LIMITED HEALTH & SAFETY MANUAL

TABLE OF CONTENTS

SECTION	DOCUMENT TITLE	# of pages
Introduction	Program Introduction	2
Section 1	Health & Safety Health & Safety Policy Environmental Policy Vistor Policy Fit for Duty Policy 1-1 – Policies and Statements 1-1 Form – Visitor Sign-in Log 1-2 – Documents and Records 1-3 – Health & Safety Responsibilities	1 1 2 3 1 4 7
Section 2	Hazard Assessment, Analysis & Control Hazard Assessment, Analysis & Control Policy 2-1 – Pre-project Requirements 2-1-1 Form – Pre-Job Construction Activities and Hazard Identification Form 2-2 – Gazz Card – Daily Hazard Assessment 2-3 – Workplace Task Standards 2-3-1 Form – Workplace Task Standards List 2-3-2 Form – Workplace Task Standard Templete	1 2 2 4 9 1
Section 3	Controls Controls Policy 3 – Controls	1 4
Section 4	Procurement & Contractor Management Procurement & Contractor Management Policy 4 - Procurement & Contractor Management 4-1 Form – Subcontractor Health & Safety Agreement 4-2 Form – Hazard Acknowledgement Letter 4-3 Form – Subcontractor Adherence to Contractor's Health and Safety Program 4-4 Form – Subcontractor Declaration of Competent Supervisor 4-5 Form – Subcontractor Health & Safety Performance Review 4-6 From – Pre-Dig Utility Checklist	1 10 3 1 1 2 1
Section 5	Company Rules Company Rules Policy Code of Conduct Policy 5 – Company Rules	1 3 6

GAZZOLA PAVING LIMITED HEALTH & SAFETY MANUAL

TABLE OF CONTENTS

Section 6	Personal Protective Equipment Personal Protective Equipment Policy 6 – Personal Protective Equipment	1 18
Section 7	Preventive Maintenance Preventive Maintenance Policy 7 – Preventive Maintenance Program	1 8
Section 8	Training & Communication Training Policy Communication Policy 8-1 – Training 8-2 – Communication 8-2-1 Form – Tailgate Safety Talk Form 8-3 – Joint Health and Safety Committees	1 1 6 6 1 10
Section 9	Workplace Inspections Workplace Inspections Policy 9 - Workplace Inspections	1 5
Section 10	Investigations & Reporting Investigations & Reporting Policy 10 – Investigations & Reporting	1 14
Section 11	Emergency Preparedness Emergency Preparedness Policy 11-1 – Emergency Plan 11-2 – Fall Prevention Plan	1 20 11
Section 12	Statistics & Records Statistics & Records Policy 12 – Statistics & Records	1 5
Section 13	Legislation & Other Requirements Legislation & Other Requirements Policy Workplace Harassment Prevention Policy Workplace Violence Prevention Policy Return to Work Policy 13-1 - Legislation and Other Requirements 13-2 Workplace Violence and Harassment 13-2-1 - Workplace Violence Prevention Program 13-2-1-1 Form - Workplace Violence Assessment / Control Measures 13-2-2 - Workplace Harassment Prevention Program 13-3-1 Form - First Aid Treatment Log	1 1 1 4 3 4 2

Revision Date: March 18, 2025

GAZZOLA PAVING LIMITED HEALTH & SAFETY MANUAL

TABLE OF CONTENTS

	13-3-2 Form – Regulation 1101 Requirements for A First	1
	Aid Kit 13-4 – Workplace Hazardous Materials Information System	7
	13-5 – Return to Work	9
	13-6 – Traffic Management Plan	3
	13-7 – Confined Space Entry Procedure	5
	13-7-1 Form – Confined Space Entry Permit	1
	13-8 – Radiation Protection Procedure	7
Section 14	Management Review and Management of Change	
	Management Review Policy	1
	Management of Change Policy	1
	14-1 – Management Review	5
	14-1-1 Form – Annual Management Review Form	8
	14-2 – Management of Change	4

Revision Date: March 18, 2025 Page 3 of 3

Health & Safety Program Introduction / Overview

OVERVIEW

The following Health and Safety Manual has been developed for **GAZZOLA PAVING LIMITED** and applies to all related companies.

In accordance with Gazzola Paving Limited's "Safety Policy" and the Occupational Health and Safety Act and applicable regulations, the following Safety Program has been developed to demonstrate the commitment of Gazzola Paving Limited in the reduction of not only accidents/injuries but also all loss causing situations, which may be created during the operation of our business.

The purpose of this program is not to hinder or restrict our operations but to increase our profitability through the "Control of Loss".

CONTENTS

This program will be used by various individuals in our operations, to ensure that all employees and/or subcontractor's health and safety is protected, through:

- Awareness of standards established for the workplace by Gazzola Paving Limited, legislative requirements, and/or Subcontractor policies/procedures for safe work. This awareness will be achieved through appropriate training sessions; employees and/or Subcontractors will be expected to actively participate in workplace health & safety.
- Monitoring of workplace conditions, compliance with standards, and use of the Internal Responsibility System.
- *Follow-up will be done* to ensure corrective actions for non-compliance and modification of workplace health & safety policies, procedures or programs.

SAFETY PROGRAM MANUAL

The Safety Program Manual is a functional reference book for Health and Safety in the workplace. It contains specific *procedures, documents* and *forms* to be used by the appointed supervisory staff, Joint Healthy & Safety Committee members and/or construction site management staff.

- Procedures identify the PURPOSE, PROCEDURE (for implementing, updating, and accountability of participants), DISTRIBUTION and RECORDS for each program section.
- Documents include reference sheets established to support and implement the above procedures.
- *Forms* includes all checklists and reports developed to simplify the procedure.

GAZZOLA PAVING LIMITED Health and Safety Manual Page 1 of 2
Revision Date: March 29, 2021 Reviewed Date: March 18, 2025

Health & Safety Program Introduction / Overview

PROGRAM SCOPE

This program will address all facets of our operation and apply to all Employees, Subcontractors and Site Management. Taking into consideration that no two workplaces are the same, input and modification may be required to suit site-specific circumstances.

Implementation and maintenance of the Health & Safety Program at Gazzola Paving Limited will be the responsibility of management, who will work closely with the Joint Health & Safety Committee to ensure that all Gazzola Paving Limited workplaces (construction projects) are maintained in accordance with the requirements of this program. The Health and Safety Coordinator will oversee implementation and maintenance of the Gazzola Paving Limited Health and Safety Program.

PROGRAM OBJECTIVES

Although, this program will be workplace specific, the basic objective is to ensure "Due Diligence" through the consistent control of loss created by accidents, injury, illness, property damage and incidents. Additional objectives include compliance with increasing legislative requirements, improved Management-Labour relations and to maintain our role of leadership in all areas within our community. These objectives will be obtained through the participation and commitment of all persons involved with this program.

PROGRAM AVAILABILITY

Copies of the Health & Safety Manual will be provided to the owners, operations management staff, the JHSC and the Supervisor as applicable. It is imperative that management:

- use the Program Manual to ensure the safety of the workers in the workplace and generate appropriate documentation that demonstrates all pro-active measures taken
- review the Program Manual with the Joint Health & Safety Committee (JHSC) where applicable
- make the Program Manual and related sections available to the JHSC members (manual and/or sections are not to leave unless permission has been granted by **Senior Management**)

Resource materials, instruction and assistance during the implementation period will be made available.

GAZZOLA PAVING LIMITED Health and Safety Manual Page 2 of 2
Revision Date: March 29, 2021 Reviewed Date: March 18, 2025



GAZZOLA PAVING LIMITED Health & Safety Policy

At Gazzola Paving Limited we place the utmost importance on the health, safety and well-being of our employees. Senior management recognizes the right of workers to work in a safe and healthy work environment, taking every reasonable precaution for the protection of workers in the workplace. To demonstrate this commitment Gazzola Paving Limited has established the corporate goal of maintaining a safe and healthy workplace. Gazzola Paving Limited Senior Management is committed to continuous monitoring of health & safety performance, setting and review health & safety objectives regularly to achieve continual improvement of the Health & Safety Management System.

The Occupational Health and Safety Act and Regulations, the provincial legislation applicable in our operations, is an important piece of legislation that sets the standards for occupational health and safety in the province of Ontario. Gazzola Paving Limited is committed to meeting or exceeding all of the regulations, duties, and the standards set by the Occupational Health and Safety Act.

The Occupational Health and Safety Act is founded upon the Internal Responsibility System. This is a system based upon the overlapping and concurrent duties, noted below, of corporations, officers, directors, managers, supervisors and workers. At each level of our organization the employer, managers, supervisors and workers must understand their duties and responsibilities identified on the health and safety program and work in full compliance with the Occupational Health and Safety Act and the applicable regulations.

Specifically, Gazzola Paving Limited as employer, is ultimately responsible for worker health and safety. The management of Gazzola Paving Limited is committed to, and promises that every reasonable precaution will be taken for the protection of the workers.

Supervisors are responsible for the health and safety of workers under their supervision and are responsible to ensure machinery, equipment and personal protective devices are safe, and in compliance with established safe practices and procedures. Supervisors will also provide employees with adequate introduction and training programs so that all Gazzola Paving Limited employees are qualified to do their job safely.

Every employee shall use safe work practices on all assignments, work in compliance with the law, and work with established policies and procedures regarding health and safety. We encourage every employee to not only be concerned about their own occupational health and safety, but also to ensure healthy and safe work practices on the part of their co-workers. We recognize the worker's responsibility to report all hazards and unsafe acts/conditions and forbid reprisals against workers fulfilling their responsibility.

The continued success of Gazzola Paving Limited is dependent upon our long-standing professional reputation for providing quality products and services in a safe and timely manner. We ask you to do your part and work together with your fellow employees and management in complying with the objectives of our corporate health and safety policies and the provisions of the Occupational Health and Safety Act. Gazzola Paving Limited seeks to encourage a cooperative attitude and approach to health and safety in the workplace by all persons. Maintaining effective communications, a proactive, consultative and cooperative approach to health and safety by workers, superintendents, foremen, management, worker health and safety representatives and outside parties will ensure that our objectives of maintaining a workplace free from hazards, injury and illness can be achieved.

Virgil Gazzola, Vice President

March 18, 2025



GAZZOLA PAVING LIMITED Environmental Policy

Gazzola Paving Limited is committed to environmental leadership in all of our business activities. We have established practices and procedures to provide a safe and healthful workplace to protect the environment, conserve energy and natural resources. These practices and procedures will allow us to achieve a healthy and safe environment.

The Canadian Net-Zero Emissions Accountability Act, which became law on June 29, 2021, enshrines in legislation Canada's commitment to achieve net-zero emissions by 2050. The Act ensures transparency and accountability as the government works to deliver on its targets. Gazzola is committed to leading by example, and is accelerating our own carbon reducing initiatives further using both carbon offsets and new asphalt production processes to become a Scope 1 and 2 carbon neutral asphalt plant and paver by 2030.

Gazzola Paving Limited is committed to:

- Providing a safe and healthful workplace; ensure personnel are trained and equipped to prevent environmental incidents, and in the event of an incident, respond within their capabilities.
- Disposing of waste safely and responsibly in accordance with applicable laws and regulations.
- Being environmentally responsible in the community where we operate; correcting incidents or conditions that endanger health, safety, or the environment.
- Improving operations and adopting technologies to minimize waste and pollution, and to eliminate health and safety risks.
- Ensuring responsible energy use throughout our business including conserving energy, improving energy efficiency, and choosing renewable over non-renewable energy when feasible.
- Meeting or exceeding all applicable Federal, Provincial and Municipal laws, and work to continually improve our environmental management system.
- Promptly reporting all non-compliance issues and/or incidents in accordance with all applicable Federal, Provincial and Municipal reporting requirements; evaluating causes of non-compliance and implement corrective actions.
- Ensuring periodic review of our compliance with all applicable laws and regulations.
- Maintaining training procedures to ensure all employees are knowledgeable of and are able to comply with all applicable environmental laws and regulations.
- Transparently tracking and reporting all key carbon emission KPIs on our website
- Promptly correcting any practice or condition that is not in keeping with this policy.

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Virgil G	azzola, Vi	ce-Pres	sident	

March 18, 2025

Date



GAZZOLA PAVING LIMITED Visitors Policy Statement

At Gazzola Paving Limited we believe that occupational health and safety should always be an integral aspect of our business and everyday lives. We sincerely hope and expect that all visitors will join us in our efforts to make each and every day a safe one and announce your arrival to our staff and sign-in/out upon each arrival. We define visitors under 2 definitions.

Competent Visitor

A competent visitor is someone who have minimum training (WHMIS and Working at Heights where applicable) and received a site-specific orientation. In these situations, the following must be maintained:

- Competent visitor is deemed competent to access the identified site areas without a host in accompaniment.
- Competent visitors are required to report concerns, unsafe conditions or situations to their host.

Casual Visitor

The casual visitor is defined where the visitors might not have all required training to function independently and/ or does not receive a site-specific orientation. In these situations, the following must be maintained;

- Casual visitors are required to accompany their host at all times.
- Casual visitors are asked to report concerns, unsafe conditions or situations to their host.
- The host will inform each visitor of their safety responsibilities and ensure that the personal protective equipment appropriate for their location and activities is worn or used.

To ensure that our employees and visitors are working in a safe environment we kindly insist that these minimum standards be strictly observed for all workplace parties.

- Always wear required personal protective equipment
- Obey all posted signs and warnings
- Only smoke and/or vape in designated smoking areas
- Be alert and yield to vehicular traffic
- Not touch or interfere with work activities, materials or equipment
- Stay with their host and keep out of restricted areas
- Never enter unguarded areas or areas that have been barricaded

In case of emergency

- Call 911 and state the nature of the emergency, location and the person making the call. Stay on the line until information is confirmed.
- If you hear an emergency alarm (i.e. 3 long horn honks), walk to the nearest safe exit and proceed to the grouping area or muster point. Do not leave the site (Everyone must be accounted for).

Vin Cente	
Virgil Gazzola, Vice-President	

March	18,	2025	
Date			



GAZZOLA PAVING LIMITED Fit for Duty Policy

Gazzola Paving Limited's Fit for Duty Policy is intended to provide a framework for dealing with the difficult and often sensitive issues stemming from substance abuse and related stress and fatigue. All employees who report to work must be prepared and fit for duties for which they have been hired.

We recognize that substance dependency is considered to be a disability under the Human Rights Code and we intend to comply with the requirements of the Code and any Health & Safety Legislation or required assistance in the implementation of this program.

Definition

Fit for Duty means a state (physical, mental and emotional) which allows the individual to perform assigned tasks competently. Being "Fit for Duty" for any specific task will lie in the sole discretion of the Supervisor for use of Prescription Drugs and Non-Prescription Substances and where applicable and appropriate, other available systems may be used including our Progressive Discipline Policy and removal from site.

Accommodation

Any Employee who is using Prescription Drugs and Non-Prescription Substances and requires accommodation in order to perform the essential duties of a job has a responsibility to communicate the need for accommodation to our management. It is critical that sufficient detail is provided indicating the type and duration of accommodation required and to cooperate in everyone's efforts to respond to the request. We shall review all possibilities to assist the worker with accommodation including transferring a worker to another work location, providing alternate duties, providing a leave of absence, and arranging for professional assistance as required including, when required, obligations of any Union Agreements.

Any employee found by reasonable cause to be under the influence of prescription or non-prescription drugs while performing his or her duties including the operation of company vehicles, may be subject to disciplinary action and or termination.

Maintaining a Valid Operator's License

All individuals that operate equipment or a motor vehicle on behalf of Gazzola Paving Limited are required to maintain a valid operator's license. Any loss of driving privileges (license) must be reported to your supervisor and the individual will no longer be allowed to drive on behalf of the company. The supervisor will notify the health and safety coordinator or applicable management representative.

The following is prohibited for all workers or Subcontractors doing work for Gazzola Paving Limited:

- Use, possession, offering or sale or distribution of prescription or non-prescription drugs, paraphernalia, or un-prescribed drugs for which a prescription is legally required in Canada.
- Presence in the body of prescription or non-prescription drugs for which a prescription is legally required in Canada, or their metabolites



GAZZOLA PAVING LIMITED Fit for Duty Policy

For these reasons, we have adopted the following stipulations that will be consistently enforced:

- No workers shall distribute, possess, consume or use alcohol or illegal drugs in any company workplace (including parking areas and other Company grounds).
- No worker shall report to work or be at work under the influence of prescription or nonprescription that may or will affect their ability to work safely.
- A worker shall use prescription or non-prescription drugs while at work as directed by the
 worker's physician, provided that the physician can supply written notice that the product
 can be used without adverse effect or limitations to the workers ability to perform their
 work.
- An acceptable physician supplied written notice should include timing of ingestion, frequency of use, manner of ingestion and duration of use.
- If a worker is taking a prescription or non-prescription drug for which there is a potential unsafe side effect, he or she has an obligation to report this usage to the supervisor.
- Workers are responsible for reporting any situations where a violation of the company Fit for Duty Policy may have occurred.
- Supervisors are required to investigate any situation where a violation of the Fit for Duty Policy may exist.
- Review available treatment programs regarding the management of prescription or nonprescription abuse related issues in the workplace.
- Where required, establish an employee assistance program and current contact information for rehabilitation centres, alcohol, drug or abuse assistance resources, etc.

Everyone at Gazzola Paving Limited will strictly adhere to all legal stipulations regarding to prescription or non-prescription drug situations within the workplace including but not limited to; human rights, confidentiality of medical information and records, as well as worker privacy.

Successful implementation of this policy will be ensured through effective planning, application, open communications and monitoring of procedures will result in the reduction of workplace incidents.

Virgil Gazzola, Vice President

March 18, 2025

Date

Section 1-1 – Policies and Statements

PURPOSE

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

SCOPE

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.

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Develop or review copies of each policy statements for review and approval from Senior Management.
- Obtain a current and signed copy of each corporate policy statement at the beginning of each calendar year for posting.
- Distribute and make available current and signed copies of each corporate policy statement.
- The Corporate Policy Statements shall be reviewed with each new worker at their company orientation.

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 organization's commitment and that the policy statement meets the requirements of all applicable legislation.
- 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.
- Ensure that the measures and procedures prescribed are carried out in the workplace.

Project Manager Responsibilities:

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

Section 1-1 - Policies and Statements

Superintendent Responsibilities:

- Assist in the coordination of availability and timelines of JHSC members for meetings and inspections.
- 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 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.
- 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 their health or safety.
- 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.

PROCEDURE

Policy Statements as a minimum address the following criteria:

- The basic objectives or intent of the policy
- The general responsibilities of Workers, Subcontractors, visitors 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 practices.

The following Policy Statements are our general Health and Safety policy statements and will be implemented as part of this section:

- Health and Safety Policy
- Environmental Policy

Section 1-1 – Policies and Statements

- Visitors Policy Statement
- Fit for Duty Policy

In addition, each element or section will start with its own policy statement as required have as required.

Policy statements are reviewed and issued by Senior Management in conjunction with the Health and Safety Coordinator on an annual basis.

The Health and Safety Policy and all other policy statements contained within Gazzola's Health and Safety Manual must be reviewed annually including the Senior Manager of the company signature and dated.

DISTRIBUTION

Distribution and communication of the policy statements on site will be as follows:

- Posted on the health and safety board as required
- Provided to Management, Supervisors and Workers, during orientation

RECORDS

Records pertaining to the communication of policy statements will be documented through forms utilized for orientation meetings, tool box safety talks and/or other general health and safety meetings.

1-1 Form - VISITOR SIGN-IN LOG

Date (mm/dd/yy)	Name	Company	Person Visiting	Time in	Time out

PURPOSE

The purpose of the Documents and Records Procedure is to identify the necessary documents and records to Gazzola Paving Limited for the effectiveness of the Health and Safety Management System, in addition to the requirements for maintaining, changing, approving and the retention of these documents and records when needed.

SCOPE

This procedure applies to all documents and records created and circulated for use by employees under the name of Gazzola Paving Limited.

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Assist Senior Management in identifying documents and records necessary to ensure effectiveness of the Health and Safety Management System.
- Identify documents of external origin that may be necessary for the operation of the Health and Safety Management System.
- Assist in reviewing and updating documents as required, in addition to arranging for providing the updated documents for review and approval by Senior Management and JHSC.
- Ensure documents are approved by Management & JHSC prior to issue and use.
- Ensure current versions of documents are readily available at the point of use.
- Identify Obsolete documents if retained for any reason and prevent their use.
- Identify and retain documents and records as necessary to demonstrate compliance with the requirements of the Health and Safety Management System.
- Communicate information to the appropriate parties regarding any nonconformance identified

Senior Management Responsibilities:

- Identify documents and records necessary to ensure effectiveness of the Health and Safety Management System.
- Perform annual reviews of the Health and Safety Management System including all policies and procedures.
- Reviewing and approving documents prior issue and use.
- Ensure documents and records remain legible and readily identifiable.

Superintendent Responsibilities:

- Assist the Health and Safety Coordinator with communicating information about changes or new versions of documents used to their teams.
- Ensuring submittal of all site documents required and provide copies of records to the office and the Health and Safety Coordinator when required.

Section 1-2 - Documents & Records

- Communicate information to the appropriate parties regarding any nonconformance identified
- Follow-up on the findings and implement recommendations.
- Maintain privacy and confidentiality of company's documents and records.

Foreman Responsibilities:

- Ensure, where reasonably possible, that every Subcontractor, worker and visitor at the workplace complies with this procedure and the Occupational Health and Safety Act and Regulations.
- Review any identified non-conformity with the superintendent and implement the corrective measures required.
- Maintain privacy and confidentiality of company's documents and records.

Workers Responsibilities:

- Working in compliance with this procedure.
- Maintain privacy and confidentiality of company's documents and records.

PROCEDURE:

- Senior Management with the assistance of the Health and Safety Coordinator will determine the documents and records necessary for the effectiveness of the Health and Safety Management System and perform an annual review. Refer to the last section of this procedure.
- 2. Health and Safety Coordinator to identify and maintain documents of external origin that may be necessary for the planning and operation of the Health and Safety Management System (ex. MOL orders, WSIB, IHSA...etc.). External documents will be maintained or posted accordingly and as necessary on Gazzola's internal server, the 4S electronic platform, Site binders, H&S posting boards...etc.
- Health and Safety Coordinator to ensure documents are approved by Senior Management and JHSC during management and JHSC meetings prior to issue and use.
- 4. Health and Safety Coordinator to ensure documents are reviewed, updated, reapproved or withdrawn as necessary by senior management and JHSC during management and JHSC meetings.
- 5. Health and Safety Coordinator to ensure changes to documents are applied and that the current versions of documents are identified and tracked using:
 - a. Date of the latest revision at the footer of the document. (Some documents require an annual review)
 - b. Date of the latest Management or JHSC review form of the document. (Some documents require an annual review)
- 6. Health and Safety Coordinator to update and ensure the 4S electronic platform carries the current versions of all applicable documents and are readily available at the point of use for the applicable employees. Health & Safety Coordinator to update

GAZZOLA PAVING LIMITED Revision Date: March 18, 2025

Section 1-2 - Documents & Records

- and ensure the current versions of all non-4S documents are readily available at the point of use at the office and in site binders for all the applicable employees.
- 7. Health and Safety Coordinator to identify any retention of obsolete documents and to prevent their use by:
 - a. Communicating the latest revisions of all documents to the applicable employees who use them
 - b. Communicating information to the appropriate parties regarding any nonconformance identified
- 8. Health and Safety Coordinator must be able to identify and retain any record as necessary to demonstrate conformity with the requirements of the Health and Safety Management System. Electronic records on the 4S electronic platform will be maintained indefinitely on the platform. Hard copies of non-4S documents will be maintained at the head office for 7 years for the purpose of retaining records unless otherwise stated by the applicable H&S procedure.
- 9. Documents and records must be maintained securely to protect privacy and confidentiality
 - a. Individualized digital access (User/Pass) for the 4S platform provided only to authorized employees.
 - b. Any employee who will be found in violation with privacy and confidentiality of the company's documents and records will be subject to the progressive discipline policy as per Section 5 of this H&S Program (Company Rules)
- Gazzola Paving Limited will ensure that documents and records remain legible and readily identifiable. Documents and records will be maintained as applicable on Gazzola's internal server, the 4S electronic platform, at the head office and site binders.

NECESSARY DOCUMENTS AND RECORDS

- All Health and Safety Policy Statements
- All Health and Safety Procedures and Programs
- Daily Hazard Assessments (GAZZ Cards)
- List of Critical Tasks
- Workplace Task Standards (Including hazard assessments, safe work practices/procedures & control measures)
- Subcontractors Qualification and Evaluation records
- Company Rules
- Progressive discipline records
- Equipment Inventory
- Maintenance Schedules and Records
- Operator Manuals and Manufacturer's Instructions
- Equipment Pre-use Inspection records
- Training Matrix
- Training Records and Certificates
- Company-wide trainings and meetings (Including attendance and meeting records)

GAZZOLA PAVING LIMITED Revision Date: March 18, 2025

Section 1-2 - Documents & Records

- Orientation Records (Including On-site orientations and Annual refresher orientations)
- JHSC meetings (Attendance & Minutes)
- Management meetings (Attendance & Minutes)
- Tailgate/Toolbox talk records
- Workplace Inspection records (Including PPE, daily, weekly and monthly inspections)
- Initial Incident notifications
- Incident Investigation Reports (Including corrective, preventive actions and followup)
- Emergency Response Plans/Procedures (For all work locations including different scenarios)
- Emergency drill records
- Emergency equipment inspection records
- Annual statistics
- Current versions of applicable legislations, regulations, standards and other requirements
- Legislative assessments (Including compliance, noise and workplace violence assessments)
- Records of the handling, storage, use and disposal of biological, chemical or physical agents as necessary
- Records of workers' exposure to biological, chemical or physical agents as necessary
- Medical surveillance program records as necessary
- Safety Data Sheets (SDS) (For all hazardous products)
- Traffic protection plans and procedures
- Management review and approval records (Of all policies, procedures and other necessary documents)
- JHSC review and approval records (Of all policies, procedures and other necessary documents)
- External communications (MOL orders, COR audits and recommendations, WSIB records and communications)
- Company Annual Report (Including statistics, trends, objectives and corrective action plans)

GAZZOLA PAVING LIMITED Revision Date: March 18, 2025

Section 1-3 - Health and Safety Responsibilities

PURPOSE

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.

SCOPE

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

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Ensure communication and documentation of workplace responsibilities to all workplace parties though 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 specific responsibilities to applicable parties.
- Respond to and report any nonconformance or deficiencies observed to Senior Management.

Senior Management Responsibilities:

- To review and approve corporate health and safety responsibilities for all work place parties.
- 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:

- 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:

- 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.

GAZZOLA PAVING LIMITED Health and Safety Manual Page 1 of 7
Revision Date: March 5, 2024 Reviewed Date: March 18, 2025

Section 1-3 - Health and Safety Responsibilities

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 Foreman 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 Foreman any contravention of the Occupational Health and Safety Act and Regulations or the existence of any hazard of which he or she knows.

PROCEDURE

Step 1;

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

- Senior Management
- Health and Safety Coordinator
- Project Managers
- Superintendent / Foreman
- Workers/Subcontractors
- Health and Safety Representatives
- Consultants/others

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.

DISTRIBUTION

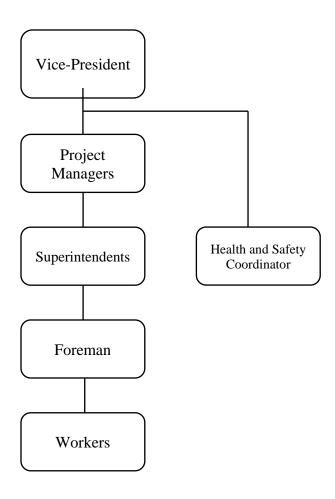
Duties and Responsibilities will be distributed upon hire and will be contained in the Health and Safety Program and in contract addendum's with Subcontractors. Furthermore, as a minimum, duties and responsibilities will be reviewed on a yearly basis.

GAZZOLA PAVING LIMITED Health and Safety Manual Page 2 of 7
Revision Date: March 5, 2024 Reviewed Date: March 18, 2025

RECORDS

All records of training or meetings will be documented with records of such meetings retained on file.

GAZZOLA PAVING LIMITED ORGANIZATIONAL CHART



GAZZOLA PAVING LIMITED Health and Safety Manual Page 3 of 7 Revision Date: March 5, 2024 Reviewed Date: March 18, 2025

Section 1-3 - Health and Safety Responsibilities

HEALTH AND SAFETY RESPONSIBILITIES

In addition to the "Strict Duties" defined in the Occupational Health and Safety Act, the following company specific duties must be adhered to in order to successfully implement our workplace specific health and safety program. Please note that these duties should not be considered all inclusive, rather they should be considered as minimum duties and responsibilities necessary to implement effective accident prevention strategies in our workplaces.

Senior Management

- Take all reasonable care to ensure that workplaces are adhering to the minimum requirements of the Occupational Health and Safety Act and all applicable Regulations.
- Provide necessary resources for the implementation and maintenance of the health and safety program.
- Provide management with written directives for health and safety.
- Obtain regular health and safety updates from the Safety Coordinator.
- To review and approve corporate health and safety responsibilities for all work place parties.
- Where required utilize the Progressive Disciplinary Policy and take progressive disciplinary actions against those who willfully disregard the company policy or legislative health and safety requirements.

Health and Safety Coordinator

- Develop corporate health and safety responsibilities for all workplace parties.
- Provide regular health and safety status reports to senior management based on findings.
- Where required, provide support and guidance for the continuous improvement of workplace health and safety.
- Initiate yearly reviews and updates of the Health and Safety Program.
- Ensure that all new workers have been oriented to the Orientation Package, have the appropriate training necessary to do the work and equipped with appropriate Personnel Protective Equipment.
- In conjunction with the Project Manager, bind all Subcontractors and Suppliers contractually to the Health and Safety Program for all work
- Communicate with the WSIB relating to the RTW process and existing claims.
- Maintain all documentation related to the injury, WSIB, modified work, and recovery progress.
- Consult with Project Managers and Site Supervisors regarding site specific Emergency Plans and Procedures.
- Ensure that supplies for First-Aid are available and that a person trained in First-Aid is working in the vicinity of the First Aid Station.
- As required, ensure that a safety representative has been selected for the site and/or a Joint Health and Safety Committee has been established when required.
- Collect and maintain "Registration of Constructors and Employers engaged in Construction" forms for all subcontracted employers.
- Liaise with external health and safety groups (e.g. Ministry of Labour, Construction Safety Association of Ontario, etc.).
- Review all workplace inspection reports, Ministry of Labour orders, and investigation reports and provide direction and guidance as is necessary.
- Follow-up on and document health and safety concerns raised by workers and/or subcontractors

GAZZOLA PAVING LIMITED Health and Safety Manual Page 4 of 7
Revision Date: March 5, 2024 Reviewed Date: March 18, 2025

Section 1-3 - Health and Safety Responsibilities

Project Manager

- Provide direction and support for health and safety initiatives.
- In conjunction with the Health and Safety Coordinator, provide senior management regular updates on the health and safety performance of workers and respective Projects.
- Know the past health and safety performance of the Subcontractors prior to hiring and hire those who have proven to be good performers.
- Conduct, document and coordinate the Preventative Maintenance activities and program.
- In conjunction with Senior Management bind all Subcontractors and Suppliers contractually to the Health and Safety Program for all work.
- Allocate the necessary resources for the successful implementation of the Health and Safety Program on each project.
- Ensure that all new workers have been oriented to the Orientation Package, have the appropriate training necessary to do the work and equipped with appropriate Personnel Protective Equipment.
- Provide the necessary guidance to the Site Management Team for the implementation of the health and safety program.
- Define site specific Emergency Plans and Procedures.
- Ensure Orientation meetings with Subcontractors are conducted prior to the commencement of work.
- Ensure that Subcontractors have a health and safety program, appropriate training and equipment/machinery documentation as is required.
- Ensure that regular site safety meetings are held with, staff, workers and subcontractors and that documentation of these meetings are maintained.
- Where required and in conjunction with Senior Management, provide notification to authorities having jurisdiction.
- Gather Registration of Construction Forms from all Employers on site "Registration of Constructors and Employers Engaged in Construction".

Superintendent / Foreman

- Implement the Health and Safety Program for Site activities under direct observation.
- Ensure appropriate postings, warnings, locates, site communication, First-Aid and washroom/wash-up facilities.
- Enforce applicable Health and Safety requirements with all Site Management Team Members and Subcontractors.
- Conduct, as a minimum, weekly inspections of the workplace.
- Conduct as a minimum daily Hazard Assessments of the workplace as part of the completion of the GAZZ Card.
- Ensure Orientation meetings with Subcontractors are conducted prior to the commencement of work.
- Respond to recommendations for improvement of workplace health and safety and investigate work refusals or complaints.
- With the assistance of the Site Management Team conduct Accident Investigations and Follow-ups.
- Conduct regular Tool Box Safety Meetings with site staff (maintain documentation)
- Maintain appropriate documentation of health and safety activities.
- Take every precaution reasonable in the circumstances for the protection of a worker.

GAZZOLA PAVING LIMITED Health and Safety Manual Page 5 of 7
Revision Date: March 5, 2024 Reviewed Date: March 18, 2025

Section 1-3 – Health and Safety Responsibilities

- Be proactive on all health and safety issues and follow-up on health and safety concerns raised by workers and/or Subcontractors.
- Liaise in a professional manner at all times with the governing authorities.
- Maintain on-site the Registration Forms from all Employers on site "Registration of Constructors and Employers Engaged in Construction".
- Where necessary make arrangements for injured workers to receive medical treatment and provide the appropriate Medical Treatment Forms.
- Follow-up on all workplace inspection reports, Ministry of Labour orders, investigation reports and provide copies to the **Project Manager** and the **Health and Safety Coordinator** immediately.

All Workers -- Rights & Duties

Rights

- 1. The right to **Participate** in Health and Safety (through Joint Health and Safety Committees)
- 2. The right to **Know** about hazardous physical and chemical agents (WHMIS)
- 3. The right to **Refuse** unsafe work
- 4. The right to **Refuse** work where workplace violence is likely to endanger himself or herself
- 5. The right to **Stop** Work (certified committee members)
- 6. The right to a Workplace free of Harassment (Workplace & Sexual) that may put your mental and physical wellbeing at risk

Duties

A worker shall:

- Work in compliance with the Occupational Health and Safety Act and Regulations,
- Use or wear the protective equipment, devices or clothing required by the employer,
- Report to his/her employer or supervisor any unsafe condition the worker is aware of (e.g. protective guard is not in place),
- Report to his/her employer or supervisor any contravention of the Occupational Health and Safety Act or Regulations.

No Worker Shall:

- Remove or make ineffective any protective device required by the regulation or employer, without providing an adequate temporary protective device and the worker must replace the protective device when the need for removing the protective device has ceased,
- Use or operate equipment, machinery, device or thing in a manner that may endanger the safety of himself/herself or any other worker,
- Engage in any prank, contest, feat of strength, unnecessary running or rough and boisterous conduct.

GAZZOLA PAVING LIMITED Health and Safety Manual Page 6 of 7
Revision Date: March 5, 2024 Reviewed Date: March 18, 2025

Section 1-3 - Health and Safety Responsibilities

Worker Health and Safety Representatives

In a cooperative manner;

- Meet to discuss health and safety issues pertinent to the workplace. Make recommendations for the continuous improvement of workplace health and safety.
- Identify situations that may be a source of danger or hazard to worker.
- As required, conduct inspections of the workplace and provide recommendations to supervisory staff for improvement where required.
- As required, conduct investigations into Critical Injuries and/or participate in the investigation into a work refusal.
- As required, participate in training and apply the learned knowledge to the improvement of workplace health and safety.

<u>Subcontractors</u>

- Ensure adherence with the criteria stipulated in the Gazzola Paving Limited Project Safety Program.
- Provide the required equipment and devices for the protection of workers and ensure that
 the workers are aware of the capabilities, limitations, use and care of the equipment or
 devices.
- Be proactive in the prevention of accidents and injury with all workers, subcontractors and visitors under your control.

<u>Consultants/Others</u> (Architects, Engineers, Suppliers, Testing and Inspection Personnel, Surveyors, Visitors, etc.)

- Be familiar with the Gazzola Paving Limited Health and Safety Requirements and ensure adherence to the requirements at all times.
- Immediately Report any hazards observed on the project to the Site Management team.

Notes: Those working in or around moving equipment/vehicles or machinery must always ensure that they are seen and have established procedures for their work that includes the use of Tear-away Fluorescent Blaze or International Orange Vests and signal persons when required. These duties will be distributed to consultants and incorporated into their agreements.

- Additional duties apply to Architects and Engineers as defined in OHSA Section 31 as follows;
- An architect or engineer contravenes the Act if, as a result of their advice or certification required by the Act that is made negligently or incompetently, a worker is endangered.

GAZZOLA PAVING LIMITED Health and Safety Manual Page 7 of 7
Revision Date: March 5, 2024 Reviewed Date: March 18, 2025



GAZZOLA PAVING LIMITED Hazard Assessment, Analysis & Control Policy Statement

Gazzola Paving Limited is committed to the prevention of illnesses/injuries by immediately eliminating or controlling hazards as soon as they are identified to protect the health and safety of workers and avoiding creating new hazards.

To that purpose, Gazzola Paving Limited will ensure that all hazards associated with all company tasks/activities are identified, assessed, analyzed and controlled. This will include routine, non-routine operations, outside the workplace hazards that may affect internal tasks/activities and the human factors where work is performed. Risks resulting from the identified hazards will be classified, prioritized and a list of the identified critical tasks will be maintained.

Gazzola Paving Limited will perform the following types of hazard assessments:

- 1. Pre-job Construction & Violence Assessment {Hazard assessment before starting projects}
- 2. Daily Hazard Assessment (GAZZ Card) {Hazard assessment for daily tasks)
- 3. WTS Job Hazard Assessment (JHA) {Registry of hazard assessments for the range of tasks/activities performed by GAZZOLA}

During this process Gazzola Paving Limited will consider all legal requirements, applicable standards and guidelines including the Occupational Health & Safety Act & Regulations in addition to considering workplaces with different designs, layouts, machines & equipment.

Gazzola Paving Limited will ensure that hazard assessments, analysis and controls are developed by the co-operation of all the competent appropriate parties of the workplace and that they are reviewed and updated as required or at least annually.

Supervisors will be responsible for conducting daily hazard assessments before starting the work and communicating the information of these assessments to all workers and contractors while ensuring all workers and contractors are following the related procedures properly.

Workers must report all hazards to their direct supervisor immediately as soon as they are identified while following all the required procedures as directed by their supervisors.

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Virgil Gazz	cola Vic e-President	

March 18, 2025
Date

Section 2-1 - Pre-Project Requirements

PURPOSE

The Pre-Job Construction Activities & Violence Risk Assessment Form is a listing of considerations that the site management team will have at their disposal to assist with the establishment and continuation of site specific accident prevention strategies.

SCOPE

The pre-project requirements will be a combination of checklists designed to give the management team a guideline for consideration before and during the duration of the project.

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Ensure, where reasonably possible, that every Subcontractor, worker and visitor at the workplace complies with all Occupational Health and Safety Act and Regulations.
- Assist in developing corporate health and safety documentation, policies and procedures where required.
- Provide Pre-Job Construction Activities & Violence Risk Assessment Form and documentation where required.
- Collect completed Pre-Job Construction Activities & Violence Risk Assessment Form for review and distribution of required documentation.
- 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.
- 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:

- Review Subcontractor documents to ensure all Subcontractors can implement their 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:

- Complete all required Pre-Job Construction Activities & Violence Risk Assessment Form and documentation is complete and available for review where 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.

Gazzola Paving Limited Revision Date: March 15, 2021 Health and Safety Manual

Section 2-1 – Pre-Project Requirements

Foreman Responsibilities:

- 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.
- The measures and procedures prescribed are carried out in the workplace.

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.

PROCEDURE

As it relates to the project and prior to the start of the project, the **Superintendent** will;

- Review and complete the requirements for required health and safety material and site specific information on site where all workers may have access as referenced on the Pre-Job Construction Activities & Violence Risk Assessment Form (2-1-1 - Form)
- 2. When completed, the Superintendent will send the completed copy of the Pre-Job Construction Activities & Violence Risk Assessment Form (2-1-1 Form) to the Health and Safety Coordinator.
- 3. Ensure that the site level requirements as part of the Daily Hazard Assessment GAZZ Card have been reviewed, completed and documented.

DISTRIBUTION

Distribution of the completed documentation for the Pre-Job Construction Activities & Violence Risk Assessment Form will be distributed as follows;

- Superintendent
- Health and Safety Coordinator

RECORDS

All records will be documented and maintained in the Project Health and Safety Files and at Head Office by **Health and Safety Coordinator**.

Gazzola Paving Limited Revision Date: March 15, 2021 Health and Safety Manual

Completed By (Print Name):	
Project # and Location:	Project Start Date:
List Subcontractors to be used:	

Construction Activities	Provide Details About the Location and Type of Work (Write N/A if Not Applicable to Project)
Asphalt Milling and/or Paving	
Work Near Vehicle Traffic (Highway/Roadway, Long Term/Short Term Closure)	
Type of Concrete Work (Curbs, Manholes, demolition etc.)	
Catch Basin / Manhole Adjustments	
Laying Road Base	
Night Work Required (Type of Work to Be Done)	
Powerline Work	
Trenching or Excavation	
Confined Space Entry (Manhole Entry)	
Designated Substances (Asbestos, Lead)	

1 | Page

Overhead Hazards (Power Lines, Bridges, Signs)	
Working at Heights	
Anticipated Extreme	
Temperatures	
(Heat or Cold Stress)	
Specialized Hazardous	
Products/Chemicals	
(Hydrated Lime)	
Work Near Water	
(Lake, River, Pond)	
Mobile Cranes / Hoisting	
Other Activity or Hazard	

Construction	Project Violence Risk Assessment
	H&S Rep regarding Workplace Violence and Harassment. Ensure orientation. Ensure Violence and Harassment documentation is posted on the project.
Will anyone be working alone?	
Will project location increase	
risk of workplace violence? (i.e.	
reportedly high crime area)	
Are hours of operation likely to	
increase the risk of violence?	
(e.g. night work)	
Other Activity or Hazard	

Revision Date: March 15, 2021 Review Date: March 18, 2025

Section 2-2 – GAZZ Card – Daily Hazard Assessment

PURPOSE

GAZZ Card is a vital component of the Health & Safety Manual and organizing health, safety, and production activities. The GAZZ Card consists of a Daily Job Hazard Analysis Report and a Daily Traffic Protection Plan. This analysis is undertaken as part of our GAZZ Card to determine potential hazards and the control strategies, which must be employed to perform our daily work activities safely, while the same concept is applied related to traffic hazards on the Traffic Protection Plan.

SCOPE

The GAZZ Card will be completed daily prior to commencement of work / shift and reviewed on site to discuss the work tasks involved and identify the associated hazards and all control requirements necessary to perform these tasks.

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Arrange for specific Hazard Assessment to be produced, scheduled and distributed as required.
- Assist is developing the site specific packages and Hazard Assessment documents as part of the GAZZ Card.
- Review the 4S electronic platform on a regular basis to ensure GAZZ cards are completed and submitted.
- Comply with all the requirements as defined under the Occupational Health and Safety (OHS) Act and Regulations.
- 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.

Senior Management Responsibilities:

- Approve processes and distribution of Daily Hazard Assessment Procedure and GAZZ Cards.
- 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.

Section 2-2 – GAZZ Card – Daily Hazard Assessment

Superintendent Responsibilities:

- Contacts all Foremen on the project daily to discuss the specific work (hazards, controls, etc.) that will occur over the next 24 hours.
- Are responsible for completing the GAZZ card for work being performed by their crew when no Foremen on site.
- Ensure a specific Daily Hazard Assessment & Daily Traffic Protection Plan GAZZ Card 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:

- Are responsible for completing the GAZZ card for work being performed by their crew
- Foreman is to walk the project / work area, Assess the specific hazards present, plan the work to be performed and decide upon the applicable hazard controls using the GAZZ card.
- At a minimum, prior to starting work, gather the workers in a huddle and discuss the hazards and controls. Paying in particular to any hazards that are out of the ordinary
- GAZZ cards are to be signed by workers at the time the GAZZ Card is completed
- Communicate known related hazards are defined with a Project Safety Plan and appropriate PPE is provided, maintained and used as directed on the GAZZ Card where required.
- Take prompt and appropriate action when unsafe conditions of any established Daily Hazard Assessment activities, traffic hazard or any other hazards have been identified or concerns regarding content is raised by workers.
- 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.
- 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.

Workers Responsibilities:

- Where provided, follow all requirements as defined within the site-specific GAZZ Card as directed by your Foreman and/or Superintendent.
- Report any damage or missing guards, PPE or equipment immediately to your Foreman.
- Workers are encouraged to provide constructive feed back to the GAZZ Card 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 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.

Section 2-2 - GAZZ Card - Daily Hazard Assessment

PROCEDURE

The GAZZ Card Process will provide identification of work specific daily hazard and provide communication to all workplace personnel prior to starting each work day. We require genuine effort into the completion of the process.

The Superintendent will provide / preparation a Project Safety Plan, Hazard Analysis package of Work descriptions, Traffic Protection Plan and scheduled activates as part of the GAZZ Card. GAZZ Card shall be completed on the 4S electronic platform and be signed by all participates as well as the Superintendent / Foreperson.

All Supervisory personnel who will be conducting and overseeing the descriptions and scheduled activates will conduct the Daily Hazard Assessment & Traffic Protection Plan components of the GAZZ Card describing the activities and identify all necessary control strategies to perform these tasks safely and on time.

The Foreman or Superintendent completing and reviewing the Daily Hazard Assessment & Traffic Protection Plan as part of the GAZZ Card must assess all aspects of the scheduled work activities.

Job Tasks and associated hazards that need to be controlled can be identified or prevented through scheduling and proactive activities. Identification with the job specific daily assessment & traffic protection will be reviewed by all workplace parties. The completed GAZZ Card will be completed, uploaded and available on site on the 4S electronic platform.

The GAZZ Card will identify hazards associated with the work tasks by assess the risks within the job by:

- 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.
- Defining and labeling hazards within the job as follows:

Section 2-2 - GAZZ Card - Daily Hazard Assessment

Risk Rating: (Risk Rating takes into account the Frequency and Severity of the Hazard) Frequency				•		
	Severity		Low (Monthly)	Medium (Weekly)	High (Daily)	
	Low (First Aid/Minor Prope	C	В	В		
	Medium (Medical Aid/Moderate Property Damage)		С	В	Α	
	High (Critical Injury/High Property Damage)		В	Α	Α	
)	Low Risk:	Low risk of injury o	Low risk of injury or equipment / property damage.			
3	Medium Risk:	Medium risk of inju	Medium risk of injury or equipment / property damage.			
4	High Risk:	High risk of injury or equipment / property damage.				

- Hazards ratings as listed on the GAZZ Card are implemented as part of the job with all listed controls already in place.
- Risk rating as listed as part of the rating system definition is a combination of Severity and Frequency as listed within the Hazard Chart.
- The outcome of the completed GAZZ Card will provide daily awareness of all identified work activities, hazards and controls for all workplace parties.
- Provide a comment and feedback section for workers to participate in the ongoing hazard assessment process.

When the GAZZ Card is completed detailing the required daily activities, the Foreman or Superintendent will review the Daily Hazard Assessment with all applicable workplace personnel on site. All personnel will sign the GAZZ Card indicating that they have received and understood the information presented.

DISTRIBUTION

- 1. Upon completion of the GAZZ Card, the competent person(s) who conducted the analysis will complete and sign the GAZZ Card and submit electronically with the 4S electronic platform.
- A copy of each completed GAZZ Card can be retrieved from the 4S electronic platform as needed.

RECORDS

All records of the GAZZ Card of will be maintained on the 4S platform and reviewed by the e sent Health and Safety Coordinator.

PURPOSE

Due to their inherent hazards and to ensure compliance with the Occupational Health and Safety Act and Related Regulations, various tasks (including underlying hazards, jobs and activities) will require Job Hazard Assessments (JHA), Safe Work Practices (SWP) and Safe Job Procedures (SJP), to be developed. All (3) (JHA, SWP, SJP), will be combined into a 'Workplace Task Standard' (WTS) document, for each respective task or hazard. WTS will be developed to specify legislative, regulatory and company specific compliance requirements.

SCOPE

Workplace Task Standard (WTS) are task or hazard specific documents, combining Job Hazard Assessments (JHA), Safe Work Practices (SWP) and Safe Job Procedures (SJP). WTS are to be used as an orientation and reference document, providing company specific health and safety awareness information to <u>all workplace parties</u>.

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Develop, in conjunction with other workplace parties, a company-wide Task/Hazard Inventory, where related jobs can be broken into tasks and critical tasks/hazards can be identified.
- Assist in developing WTS, relating to jobs and tasks or hazards that require additional direction and company specific expectations.
- Arrange for Senior Management to conduct an annual review of the Task/Hazard Inventory, and WTS package.
- 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.
- Provide to new and existing employees a review of the WTS list during orientations.
 Employees shall be notified when changes are made to WTS by means of annual orientation or tailgate talks.
- Provide a WTS package to all Project Managers, Superintendents, Foreman and post on all Health and Safety boards.
- Provide a project specific WTS package to Superintendent and/or Foreman, as part of the project specific safety plan and safety binders.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.

Senior Management Responsibilities:

- Ensure all company employees receive the appropriate training, WTS reviews and workplace specific overviews.
- Assist in the development WTSs.
- Review and approve WTSs on an annual basis.
- 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.

Ensure that the measures and procedures prescribed are carried out in the workplace.

Project Manager Responsibilities:

- Ensure all company employees receive the appropriate training, WTS reviews and workplace specific overviews.
- Assist in the development WTSs.
- Assist in the review and approve WTSs on an annual basis.
- 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.
- Ensure that the measures and procedures prescribed are carried out in the workplace.

Superintendent Responsibilities:

- Communicate with the Foreman to ensure the appropriate WTS are referenced daily.
- Ensure all company employees receive the appropriate training, WTS reviews and workplace specific overviews.
- Assist in the development WTSs.
- Assist in the review and approve WTSs on an annual basis.
- 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.
- Ensure that the measures and procedures prescribed are carried out in the workplace.

Foreman Responsibilities:

- Review and ensure the WTS package is followed by all Subcontractors and Workers on site.
- Provide input during the annual review of WTSs.
- 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 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.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Workers Responsibilities:

- Follow the requirements of WTSs as directed by your supervisor.
- 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, any actual or potential hazard he/she can recognize or the absence/defect in any equipment or protective device.

PROCEDURE

Senior Management, the **Health and Safety Coordinator**, **Project Managers** and/or **Superintendents**, must ensure company specific Job Hazard Assessments (JHA), Safe Work Practices (SWP) and Safe Job Procedures (SJP) are documented for and provided to each workplace location (Offices, Facilities and Projects).

Job Hazard Assessments

JHAs will be conducted for all workplace tasks/hazards including routine, non-routine and the human factors involved. JHAs will "break down" each task's hazards and their respective controls. In doing so, JHAs will identify minimum requirements necessary to perform the task.

Safe Work Practices

SWPs will provide all company employees, with the specific health and safety expectations prior to commencing their employment. SWP will detail all facets of our workplace activities, and specific company expectations. SWPs will identify minimum health and safety expectations needed to work within our workplaces.

Safe Job Procedures

SJP will be developed for all high-risk tasks/hazards (Critical). SJPs are to be used by site management as a means of providing basic health and safety awareness information to Workers and Subcontractors.

Each of the listed JHA, SWP, SJP, will be combined into a 'Workplace Task Standard' (WTS) document (2-3-2 Form), for each respective task or hazard. A package of WTSs will be posted on the Health and Safety boards and carried in all Superintendents and Foreman vehicles.

For Project Specific Safety Plans, it will be the responsibility of the **Health and Safety Coordinator** and the **Project Manager**, to develop and provide WTSs to **Superintendents**. It will be the responsibility of **Superintendents** to oversee expectations set out within WTSs, and to ensure our **Workers** and/or **Subcontractors** adhere to them.

WTSs will be built upon company specific expectations and requirements that meet or exceed legal and/or legislative requirements. On projects, all applicable WTSs are to be communicated and documented as part of our daily hazard assessment process as part of the completion of the GAZZ Card

Procedures for completing Workplace Task Standards, are broken down into the following parts:

Part 1: Job, Task & Hazard Inventory
Part 2: Job Hazard Assessment
Part 3: Cofe World Profities

Part 3: Safe Work PracticesPart 4: Safe Job Procedures

Completed WTS will be used as part of both **Employee Orientations** and site level reference documents (Project Specific Safety Plans, Daily Work Order, or when required by workers for clarity).

Each WTS will be regarded as our company's minimum expectations. WTS will be held as established guidelines for the completion of work activities.

WTS will be reviewed and updated as required at least annually by Senior Management and all appropriate parties involved, during the Annual Review.

More frequent reviews may be required:

- 1. After Incident Investigations.
- 2. After any change in a process, machine, equipment, materials or substances.
- 3. Whenever deemed necessary for the protection of workers.

DISTRIBUTION

The distribution of WTS is the responsibility of the **Health and Safety Coordinator** and the **Superintendent** to provide specific information to their workers with the direction. The **Subcontractor** must submit any required additional procedures relating to their project specific activities as they relate to potentially hazardous work. WTS's will be posted on the 4S platform and on the Gazzola Website.

RECORDS

Copies of all procedures or specifications will be maintained on file by the **Superintendent** and forwarded to the **Health and Safety Coordinator** upon completion of the project.

Records of changes made to WTSs following annual reviews or incidents/accidents will be kept.

DEVELOPMENT OF WORKPLACE TASK STANDARDS (WTS)

Part 1 – Job, Task & Hazard Inventory

For the purposes of this procedure:

A job: A function consisting of one or more tasks that results in the completion of the function.

Jobs that are performed as a component of other jobs, will be considered tasks as well.

Thus all jobs are tasks, but not all tasks are jobs.

A task: A specific component of a job.

A hazard: Any potential source of harm to persons or damage to property.

<u>Examples:</u> Installing drywall - is a job. The tasks involved in this job might include – storing/handling material, using hand tools, mudding/taping joints, sanding, disposing of excess material, and housekeeping. Tasks involved in the completion of a job can be numerous and may be dependent on an assortment of skills, senses and abilities. Specific areas or objects may be identified as hazards based on their hazardous nature and their potential to cause harm or damage during use or storage such as confined spaces and compressed gases.

The Job, Task & Hazard Inventory must initially be conducted -- in cooperation with the **Health** and **Safety Coordinator**, **Project Managers**, **Superintendents** and **Senior Management**, **Workers**, **Sub-Contractors & Suppliers --** This **Team** to identify all jobs and tasks performed and hazards that may be present within our workplaces including routine, non-routine and the human factors involved. As jobs can be components of other jobs, all references to tasks, include jobs as well.

The inventory will be based on current and potential activities/hazards within all company workplace locations. Identified tasks or hazards, must be recorded on the 'Workplace Task Standards List' (2-3-1 – Form). The analysis of this information takes place at a later stage (Job Hazard Analysis).

All personnel involved in the development and/or review of the Job, Task & Hazard Inventory must be, as a minimum, trained on basic health and safety awareness for (Workers/Supervisors) and deemed to be a competent persons as defined by the Occupational Health & Safety Act (OSHA including:

- a. knowledge, training and experience with the hazard, task and/or activity.
- b. familiarity with the Act and regulations that apply to the hazard, task and/or activity.
- c. Knowledge of actual and potential dangers of the workplace where the hazard exists or where the task/activity is being performed.

Gazzola Paving Ltd. will ensure the required competencies for conducting the Job, Task & Hazard inventory are satisfied before appointing the involved team.

Once the Job, Task & Hazard Inventory is completed, it will undergo a review by the **team**. During this review, the **team** will rate the preliminary risk (prior to developing controls) and the residual risk (after developing controls) of each task or hazard. A hazard or task's risk will be rated using our 'Risk Rating Process' included herein.

The **Workplace Task Standard (2-3-2 - Form)** must consider and/ or include the following information:

Job and/or Task:	The name assigned to a given job, task or hazard.		
Application:	Where the job or task is performed or where a hazard is present		
	considering the design, ergonomics & the layout (construction projects,		
	offices, storage facilities, maintenance shops, etc.).		
Legislation	Applicable legislative requirements, associated standards and guidelines		
	to the Job and/or Task as per the list included within Section 13		
	(Legislation & Other Requirements.		
Equipment:	Any type of tools, machinery, equipment, mechanisms or devices used in		
	the performance of the jobs or tasks.		
Department	Primary department responsible for performing job or task (if applicable)		
	or responsible for an area where a hazard may be present.		
Internal or Subcontracted:	Whether the job, task or hazard, is present because of work performed by		
	our company, or by subcontractors in our workplace locations.		
Known Hazards:	These are potential or actual hazards that have been associated with the		
	tasks involved (determined by prior incidents, accidents, or injuries, etc.).		
	Known hazards will include hazards that may originate outside the		
	workplace but will have an effect within, these hazards can be identified		
	by the site supervisor during any phase of the hazard assessment,		
	analysis and control process.		
Chemicals:	Any chemicals, agents, or material used/encountered, during the		
	performance of the jobs or tasks.		
Preliminary Risk Rating:	The potential risk of the jobs or tasks (determined using the Risk Rating		
(Risk Before Controls)	Process included herein).		
Residual Risk Rating:	The amount of risk that remains after controls are accounted for		
(Risk After Controls)	(determined using the Risk Rating Process included herein).		

Part 2 – Job Hazard Assessments

Following the completion of the Job, Task & Hazard Inventory, a Job Hazard Assessment (JHA) will be conducted for each task or hazard identified.

Each will be broken down into the following categories:

- A. Breakdown the job, task or hazard into smaller hazards involved. This can be performed during the Job, Task & Hazard Inventory process.
- B. **Identify** the smaller **potential hazards** or potential energies, associated with each task or hazard.
- C. **Determine preventive measures**, to eliminate or control the hazards or potential energies, associated with each task or hazard.
- D. Using the Risk Rating Process, **rate the potential risk of the task/hazard**. Identify which tasks/hazards are above the 'Risk Threshold Limit' before the application of controls, and are therefore classified as '**Critical**'.
- E. Using the Risk Rating Process, rate the residual **risk of the task/hazard** after the application of controls.

All identified hazards, their respective controls, and their respective risk rating before and after controls, must be recorded on the applicable WTS.

Risk Rating Process:

Our Risk Rating Process is based on the following chart, whereas both the frequency and severity (of potential injuries related to the task or hazard) increases, so too does the risk rating (indicating the likelihood of personal injury or accidents).

Our Risk Rating Threshold will be A – tasks or hazards with a high likelihood of personal injury or accidents. Threshold is determined based on the risk rating assigned before application of controls.

Risk Rating: (Risk Rating takes into account the Frequency and Severity of the Hazard)					
	Frequency				
	Severity		Low (Monthly)	Medium (Weekly)	High (Daily)
	Low (First Aid/Minor Property Damage)		С	В	В
	Medium (Medical Aid/Moderate Property Damage)		C	В	Α
	High (Critical Injury/High Property Damage)		В	Α	Α
С	Low Risk: Low risk of injury or equipment / property damage.				
В	Medium Risk:	Medium risk of injury or equipment / property damage.			
Α	High Risk:	High risk of injury or equipment / property damage.			

Risk assessments of the identified hazards in accordance with this risk rating process must be completed before the start of any task. A new or a re-assessment may be needed:

• When equipment, material, substance or process is introduced or changed.

•	Upon any change in the Safety Management System that may affect the normal sequence of a job/task

Step 3 - Safe Work Practices

Additional company specific Safe Work Practices (SWP) will be developed based on existing company specific knowledge of tasks/hazards, as well as reference material from equipment manuals, industry standards and other professional associations (such as the IHSA or WSIB). All completed WTS will have a company specific SWP that applies to legal and company exceptions.

Safe Work Practices will address, at a minimum, the follow topics:

General Safe Work Practices:	Safe Work Practices that apply to all task/hazard topics.
Specific Safe Work Practices:	Safe Work Practices that relate to distinct sub-topics, related to the
	task/hazard (e.g. Task: Working at Heights, Sub-Topics: Guardrails,
	Anchor Points, Rescue, etc.).
Personal Protective	Safe Work Practices related to PPE requirements. Lists required PPE
Equipment Requirements:	based on task/hazard.
Training Requirements:	Safe Work Practices related to training requirements. Lists required
	training needs based on task/hazard.
Inspection Requirements:	Safe Work Practices related to inspection requirements. Lists required
	inspections related to task/hazard.

Step 4 - Safe Job Procedures

Safe Job Procedures (SJPs) will be developed for WTSs identified as **critical** (tasks/hazards whose risk rating meets or exceeds our Risk Rating Threshold of A before the application of controls).

SJPs will also be developed for tasks/hazards **required by legislative of regulatory** requirements, to have written procedures.

SJPs will list, in a logical order, controls listed in the JHA and practices listed in the SWP. In doing so, SJPs will provide company specific expectations, oversight and direction.

Safe Job Procedures will address, at a minimum, the follow topics:

Pre-Task Requirements	Procedures related to steps that must be completed prior to commencing work activities or interacting with a hazard. This can include, planning (daily hazard assessments), inspections (equipment, PPE, etc.), notifications.		
During Task Requirements:	Procedures related to steps that must be completed while completing		
	the task or interacting with a hazard.		
Task Completion	Procedures related to steps that must be completed after a task has		
Requirements:	been completed or after exposure to a hazard. This can include,		
	housekeeping, material storage, and close out documents.		
Specific Sub-Topic	Procedures related to distinct sub-topics referenced in the (3)		
Requirements:	aforementioned procedures. This could include, Fall Rescue		
	Procedures, Guardrail Installation Procedures, or Protective Cover		
	Removal Procedures.		

2-3-1 FORM

WORKPLACE TASK STANDARDS LIST

<u>Task</u>	Rating
Asbestos Milling	Α
Asphalt Lab Operations	Α
Asphalt Milling	Α
Asphalt Paving – Freeway/Highway	Α
Asphalt Paving	Α
Confined Space	Α
Asphalt Plant Operations	Α
Equipment and Machinery Operation	Α
Hazardous Agents (Biological)	Α
Concrete Work (Forming and Pouring)	В
Crack Sealing Operations	В
Crushing Screening Operations	В
Equipment Repairs (Blocking)	В
Hazardous Energy Control	В
Hoisting and Rigging	В
Hot Work	В
Lead	В
Administrative Duties	С
Compressed Gas	С
Driving and Vehicle Operation	С
Extension Cords	С
Fencing and Hoarding	С
Fire Extinguishers	С
Fuel Powered Tools and Equipment	С
Fueling and Refueling	С

<u>Task</u>	Rating
Hazardous Agents (Chemical)	Α
Hazardous Agents (Physical)	Α
Infrared Joint Heater	Α
Manual Snow Removal Operations	
Noise	Α
Overhead Hazards (Powerlines)	Α
Traffic Control	Α
Trenching and Excavating	Α
Working at Heights	Α
Night Work	В
Powered Elevating Work Platforms	В
Removal and Demolition	В
Shop Operations	В
Silica	В
Snow Removal Operations	В
Underground Hazards and Locates	В
Workplace Violence and Harassment	В
Housekeeping	С
Hydraulic Equipment	С
Ladders	С
Loading and Unloading	С
Maintenance and Cleaning	С
Manual Material Handling	С
Power and Hand Tools	С

All of the tasks listed above have a Workplace Task Standard (WTS) and are prioritized based on their assigned risk rating before the application of controls. The specific workplace task standard (WTS) will carry an assigned risk rating before and after the application of controls.

The "A" rated Tasks have been identified as Critical Tasks. They have a WTS that includes a Hazard Assessment, Safe Work Practices and a detailed Safe Job Procedure.

The "B" rated Tasks have a WTS that includes a Hazard Assessment, Safe Work Practices and a general Safe Job Procedure.

The "C" Rated Tasks have a WTS that includes a Hazard Assessment and Safe Work Practices.

Risk Rating: (Risk Rating takes into account the Frequency and Severity of the Hazard)									
	Frequency								
	Severit	Low (Monthly)	Medium (Weekly)	High (Daily)					
Low (First Aid/Minor property dam	С	В	В					
Mediu	um (Medical Aid/Moderate pr	С	В	Α					
High	(Critical Injury/High property	damage)	В	Α	Α				
С	Low Risk:	w Risk: Low risk of injury or equipment / property damage.							
В	Medium Risk:	Medium risk of injury or equipment / property damage.							
Α	High Risk:	k: High risk of injury or equipment / property damage.							

GAZZOLA PAVING LIMITED

2-3-2 FORM

TASK / TITLE

_											
Date Revised:				Ove	erall Task Risk	Rating: Be	fore Controls	A After C	Controls	В	
Description:											
Location(s):	(Office; Shop; Asphalt Plant; Construction Projects; Snow Camp)										
Associated Documents (Standard, SJP, SWP):											
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3.											
4.											



GAZZOLA PAVING LIMITED Controls Policy Statement

Gazzola Paving Limited will ensure that all workplace hazards are controlled in a timely manner. Control measures for all hazards will be identified during the daily and on-going hazard assessment process. Controls will consist of all the steps and equipment necessary to protect workers from the exposure to hazards.

Gazzola Paving Limited will seek the participation of different company levels in the development and review of Controls. Assigned controls will be documented and approved by Management.

Appropriate control measures shall follow the health and safety system designed to eliminate, minimize or control the exposure to hazards (The Hierarchy of Control).

- i. Elimination
- ii. Substitution
- iii. Engineering controls
- iv. Administrative controls
- v. Personal protective equipment

Gazzola Paving Limited will ensure that assigned control measures meet or exceed the controls required by the legislative requirements and other applicable requirements such as standards, guidelines and manufacturer's instructions.

Gazzola Paving Limited will communicate identified control measures with all affected workplace parties and will make sure that the identified control measures are made readily available at the point of use for all workers.

Virgil Gazzola, Vice-Flesident

March 18, 2025

Date

Section 3 - Controls

PURPOSE

To ensure that the Health and Safety of all employees is protected by controlling hazards on a timely manner. This can be done by ensuring that all required and recommended controls are identified, implemented and followed on all work locations.

SCOPE

Identification, development, implementation and follow-up on all control measures required and recommended to control all hazards resulting from the scope of operations.

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Identify, with other workplace parties (Workers, Supervisors, etc.) the required control
 measures for all tasks and hazards resulting from all activities.
- Assist in developing and assigning the necessary controls.
- Arrange for Senior Management to approve and conduct an annual review of the Workplace task standards that include hazard assessments and control measures.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Maintain the documentation and records required for corrective actions and control measures.
- Ensure the communication of information to the appropriate parties regarding controls.
- Ensure that Controls are accessible and readily available at the point of use for all workers for all related activities.

Senior Management Responsibilities:

- Ensure Controls are developed and approved for all company activities.
- Ensure the participation of all appropriate competent workplace parties (Workers, Supervisors, Managers, etc.) in the development and the review of all control measures.
- Ensure Controls are developed by competent persons as defined under the Occupational Health & Safety Act.
- Ensure all company employees receive the appropriate training related to Controls.
- Assist in the development of Controls.
- Review and approve the Workplace task standards including hazard assessments and Controls as required and at least annually.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Ensure that the measures and procedures prescribed are carried out in the workplace.

Superintendent Responsibilities:

- Communicate with all parties on site and ensure the appropriate control measures are identified on the daily GAZZ Card.
- Assist in developing and assigning the necessary controls.
- Review and ensure the appropriate control measures are followed by all Subcontractors and Workers on site.

GAZZOLA PAVING LIMITED Revision Date: June 26, 2023

Section 3 - Controls

- Provide input during the annual review of Workplace task standards including hazard assessments and control measures.
- 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.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Take every precaution reasonable in the circumstances for the protection of a worker.
- Ensure that Controls are accessible and readily available at the point of use for all workers for all related activities.

Foreman Responsibilities:

- Assist in developing and assigning the necessary controls.
- Assist the Site Superintendent with the daily GAZZ Card.
- Ensure, where reasonably possible, that every Subcontractor, worker and visitor at the
 workplace are following the appropriate control measures related to the task and are
 complying with all applicable legislations, regulations and any other requirements including
 The Occupational Health and Safety Act and Construction 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:

- Follow the appropriate control measures as directed by the supervisor.
- Assist in developing Workplace task standards including hazard assessments and controls.
- Work in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations and this procedure as prescribed.
- Report to the Supervisor all hazards, any violation of the Occupational Health and Safety Act and Regulations or defect in any equipment or protective device.

PROCEDURE

Daily Hazard Assessment (GAZZ Card):

It is the responsibility of the site supervisor or foreman to conduct a daily job hazard assessment (GAZZ Card) at the beginning of each workday. The daily GAZZ Card will identify the necessary controls for all tasks being performed for the day, and whether further controls may be needed to perform the work in a safe manner. The daily GAZZ Card will be used to communicate the mentioned identified information with all workers before starting to perform the tasks.

Management and supervisors will ensure that the appropriate control measures identified are readily available at the point of use for all workers.

Development & Review of Controls:

In addition to the daily GAZZ Cards, The Workplace Task Standards will include Individual hazard assessments for all company's operations and tasks/hazards and will identify the recommended control measures for all tasks.

GAZZOLA PAVING LIMITED Revision Date: June 26, 2023

Section 3 - Controls

- Workplace Task Standards including controls will be developed and reviewed by an assigned team of appropriate competent workplace parties from different levels at the company as identified in Section 2, including managers, workers and supervisors.
- Workplace Task Standards including controls will cover all company tasks/activities and will be approved by Senior Management during the annual review.
- Workplace Task Standards including controls will consider all applicable legal and other requirements such as standards, guidelines or manufacturer's instructions during the development and reviews of WTS by researching and/or reviewing the applicable legal and other requirements.

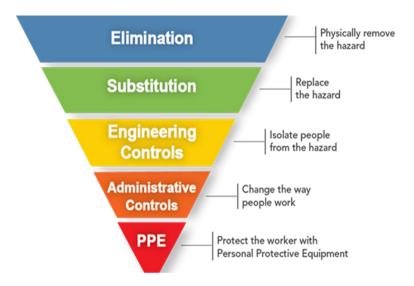
Workplace Task Standards including controls will be reviewed and updated as required at least annually by Senior Management and all appropriate parties involved.

Health & Safety Controls

Gazzola Paving Limited will ensure that all health and safety hazards are controlled in a timely manner. The controls will follow the Hierarchy of Controls and will consist of all steps necessary to protect workers from exposure to a substance or system, and the procedures required to monitor worker exposure and their health to hazards. Gazzola will document corrective action for any hazard that is identified, so as to ensure that appropriate controls are implemented.

HIERARCHY OF CONTROL

Hierarchy of Control is a system used to eliminate, minimize or control the exposure to a hazard.



Elimination

Eliminating, or removing the hazard is the most effective hazard control. An example of eliminating a fall from height safety hazard might be to relocate the equipment, material or process to the ground. This allows the work to be performed on the ground, not at height.

Substitution

Substitution is the second most effective hazard control. Substitution involves replacing the source of the hazard with something less hazardous. An example of substitution would be using a lift for material, rather than manually lifting.

Engineering Controls

Engineered controls is the third most effective means of controlling hazards. Engineered controls isolate people from hazards. Capital costs of engineered controls may be higher than less effective controls in the hierarchy; however, they may reduce future costs. For example, a crew might build a work platform with guardrails rather than purchase, replace, and maintain full body harnesses, lanyards, rope grabs and lifelines. Enclosure and Isolation are engineered controls that create physical barriers between workers and hazards. An example of an enclosure might be a fence around the activity of heavy equipment in a yard. This would keep workers on foot away from the moving equipment and protect workers from being struck by equipment. An example of isolation might be Lock out procedures. Lock out is a procedure where the energy hazard (electrical, mechanical, hydraulic, pneumatic, chemical or thermal) is isolated at a switch or a valve allowing workers to handle equipment and material without inadvertently releasing energy.

Administrative Controls

Administrative controls change the way people work, or how long they are exposed to the hazard. Administrative controls limit the worker's exposure to the hazard. Examples of administrative controls include procedure changes, employee training, posting signs, and scheduling a night shift to allow a hazardous task to be completed when few people are exposed.

Personal Protective Equipment (PPE)

PPE is the least effective means of controlling a safety hazard. PPE controls the exposure a worker has to a safety hazard and does not control the hazard. PPE includes fall arrest and travel restraint equipment, hard hat, safety footwear, reflective vests, arm and leg bands, and high visibility clothing.

Management and superintendents will ensure that the appropriate control measures identified are readily available at the point of use for all workers.

RECORDS

All control measures will be recorded on daily GAZZ Cards and on the Workplace Task Standards (WTS) and records will be kept at the office.

COMMUNICATION

All control measures will be recorded on daily GAZZ Cards and on the Workplace Task Standards (WTS) will be recorded, maintained and communicated regularly to workforce and all affected parties. This can be in the form of the daily GAZZ Card discussion, toolbox talks, training, Annual Orientations, safety meetings, etc.



GAZZOLA PAVING LIMITED Procurement and Contractor Management Policy Statement

Gazzola Paving Limited is committed to the selection of Health and Safety minded subcontractors and service providers. Bases on our belief in the Internal Responsibility System and that all workplace parties must work together and do their part in achieving a healthy and a safe workplace, Gazzola Paving Limited will develop Health and Safety criteria to help select, monitor and evaluate subcontractors and service providers. Meeting the criteria should give an indication on the subcontractor's ability and competency to assess and control Health and Safety hazards resulting from work done by the subcontractor or by our Company. Meeting the criteria will also play a role in the continuity of business with the subcontractor or service provider.

Gazzola Paving Limited will maintain open communication channels with all workplace parties including subcontractors and service providers, especially when there is a change that will affect the Health and Safety of the work.

Gazzola Paving Limited, when working as the General Contractor on a project, maintains the right to lead the co-ordination of all Health and Safety requirements on all employers. Gazzola Paving Limited will enforce the Health & Safety measures and procedures prescribed by the Occupational Health and Safety Act (OHSA) and all applicable regulations to ensure the Health and Safety of all workers on the project is protected as listed under the Constructor duties in the Occupational Health and Safety Act (OHSA).

Virgil Gazzola, Vice-President

March 18, 2025

Date

PURPOSE

The purpose of the Contractor/Subcontractor Procedure is to set a minimum standard for all those that work under Gazzola Paving Limited ("Gazzola"). in a contract or subcontract capacity. This procedure is to ensure that all contractors/subcontractors follow the OHSA requirements and Gazzola's Health & Safety Program requirements.

SCOPE

- Pertaining to the health, safety, and environment portion of each entity, service provider or subcontractor working directly for Gazzola.
- Pertaining to the health, safety, and environment portion of each entity, service provider or subcontractor working under any other entity or subcontractor working for Gazzola.

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Ensuring subcontractors are following Gazzola Health & Safety Program.
- Ensuring service providers and subcontractors have provided all appropriate Health & Safety documentation.
- Assist in the service provider and sub-contractor review procedure as required.

Senior Management Responsibilities:

 Reviewing the service provider and subcontractor performance review completed by the project manager and the site superintendent.

Project Manager Responsibilities:

- Determining which subcontractors are to perform work on projects.
- Advising the Health & Safety Coordinator and Site Superintendent of the subcontractor information and contract details.
- Completing the subcontractor review form with input from the Site Superintendent and the Health & Safety Coordinator.
- Ensure communication of the requirements under this procedure is scheduled with all site level personnel including workers, service providers and subcontractors.
- Requesting service providers and subcontractor documents to ensure all service providers and Subcontractors can demonstrate competency and implement the site-specific workplace requirements.
- Review workplace specific requirements under the forms required on this procedure

Superintendent Responsibilities:

- Conducting Site Orientations and updating service providers and subcontractors on Gazzola Policies and Procedures.
- Ensuring submittal of subcontractor's daily/weekly paperwork, such as hazard assessments, site inspections, toolbox talks, etc.
- Conducting inspections of sites, documenting findings and sharing relevant information with Gazzola senior management.

GAZZOLA PAVING LIMITED Revision Date: March 5, 2024

- Review findings with each Foreman to ensure that corrective measures are taken.
- Follow-up on the findings and implement recommendations for each unsafe condition.

Foreman Responsibilities:

- Ensure, where reasonably possible, that every service providers and subcontractor, worker and visitor at the workplace complies with all Occupational Health and Safety Act and Regulations.
- Conducting inspections of sites, documenting findings and sharing relevant information with Gazzola Superintendent
- Review findings with the superintendent and implement the corrective measures required.

Workers Responsibilities:

- Working in conjunction with service providers and subcontractor employees.
- Ensuring subcontractors are following Gazzola Health & Safety Program.

Subcontractors Responsibilities:

- Ensure compliance to all applicable H&S regulatory requirements and relevant procedural requirements outlined within the Gazzola H&S manual.
- Conduct Toolbox Talks or an equivalent sub-contractor's safety meeting with their employees at least once a week. A copy of the toolbox talk to be forwarded to the Site superintendent on a weekly basis.
- Inspect all equipment and work site conditions prior to beginning work. All tools and equipment shall be maintained in safe operating condition.
- Ensure that Locates have been obtained for all underground utilities and are maintained on regular basis.
- Ensure that all necessary PPE/ clothing for employees is provided and used appropriately.
- Report any injuries requiring medical attention to the Site Superintendent and required regulatory agencies.
- Undertake an investigation of all incidents and near misses and forward a copy of all related reports to the Gazzola within 24 hours.
- Attend and participate, in mandatory weekly H&S meetings as determined by Gazzola.
- Ensure compliance with instructions regarding corrective actions issued by Gazzola.
- Ensure that employees attend orientation training prior to beginning work.
- Subcontractor are responsible for advising all their employees of the requirements outlined within this procedure.

Service Provider Responsibilities:

- Ensure compliance to all applicable H&S regulatory requirements and relevant procedural requirements outlined within the Gazzola H&S manual.
- Inspect all equipment and work site conditions prior to beginning work on a Gazzola project. All tools and equipment shall be maintained in safe operating condition.
- Ensure that all necessary PPE/ clothing for employees is provided and used appropriately.
- Report any injuries requiring medical attention to the Site Superintendent and required regulatory agencies.

GAZZOLA PAVING LIMITED Revision Date: March 5, 2024

- Undertake an investigation of all incidents and near misses and forward a copy of all related reports to the Gazzola within 24 hours.
- Attend and participate, H&S meetings, when necessary, as requested by the Superintendent.
- Ensure compliance with instructions regarding corrective actions issued by Gazzola Paving.
- Ensure that employees know Gazzola's H&S requirements while on site.
- Service providers are responsible for advising all their employees of the requirements outlined within this procedure.

PROCEDURE

Gazzola has developed specific criteria for selecting, monitoring and evaluating its sub-contractors and service providers. The mentioned criteria along with the provided forms will be used to ensure that Gazzola's work is sub-contracted in a fair and a consistent manner to Health and Safety minded Sub-contractors that can prove the ability and the competency in:

- Assessing and controlling hazards resulting from their work that may impact the Health and Safety of any worker on site.
- Assessing and controlling hazards resulting from other Gazzola's work that may impact the Health and Safety of their workers

To comply with the above requirements, subcontractors and service providers on Gazzola's jobsites are required to demonstrate the ability to perform their own hazard assessments, providing the process is deemed to be meeting or exceeding Gazzola's hazard assessment process requirements during all phases of the subcontractor's work on a project (Selection, Monitoring & Evaluation).

Subcontractors and service providers lacking the capacity or resources to implement an acceptable hazard assessment process due to size or any other restrictions, will be required to follow Gazzola's hazard assessment process as conducted by Gazzola's supervisor on site in accordance with Section 2 (Hazard Assessment, Analysis & Control) & Section 3 (Controls) of this H&S Program.

In addition to that, Gazzola will include all services provided or tasks performed by sub-contractors into its own hazard assessment process including the identification of appropriate control measures.

Contractor/Subcontractor Management:

Selection:

- 1. Gazzola Project Manager to determine which and when subcontractor will be working on a project site.
- 2. Gazzola Project Manager to communicate subcontractor details to Health and Safety Coordinator and Site Superintendent.
- 3. Gazzola Project Manager to provide direct Subcontractor with a copy of the Gazzola Health & Safety Program (or applicable/relevant portions).

GAZZOLA PAVING LIMITED Revision Date: March 5, 2024

- 4. Gazzola Senior Management or Project Manager to provide subcontractors with a complete subcontract agreement outlining the scope of work, timelines, milestones and payment details.
- 5. Gazzola Senior Management or Project Manager to provide subcontractor with a copy of this procedure.
- 6. Subcontractor to provide all documentation prior to beginning work:
 - Subcontractor Health and Safety Agreement (Form 4-1)
 - Fully signed contract
 - Hazard acknowledgement letter (Form 4-2)
 - Subcontractor Adherence to Contractors Health and Safety Program (Form 4-3)
 - Form 1000
 - WSIB clearance certificate
 - Liability insurance certificate
 - Competent Supervisor Form (Form 4-4)
 - SDS Sheets and Proof of Worker(s)WHIMS training
 - Additional Training Certificates as Required by all legislative acts and regulations relevant to the scope of their work (ex. Work at Height)
 - Copy of Subcontractor's Health & Safety Policy
 - Copy of Subcontractor's Workplace Violence & Harassment Policy
 - Pre-Start JHA (Refer to Form 2-1-1)
 - Underground Utility Locates
- 7. Subcontractor to complete transfer of Gazzola Health & Safety Program details and required documentation to any party under they employ and direction, whether directly or via a subcontract.
- 8. Subcontractor to ensure that all persons under their direction or employ, whether directly or via subcontract, shall be fully aware and remain compliant with this policy and all appropriate transfer of policy and expectation is completed.

Contractor/Subcontractor Monitoring:

- 1. Gazzola Health and Safety Coordinators and Site Superintendents/Foremen shall inspect and monitor the ongoing activities of the subcontractor.
- 2. Subcontractor to always complete necessary modifications when noted to remain compliant to all policies and legal requirements.
- 3. Gazzola Health and Safety Coordinators to note any subcontractor violations relative to health, safety, and environmental and bring to the attention of Gazzola Paving Ltd. senior management. This includes direct and indirect subcontractors. Non-compliant entities will be warned of the infraction and held accountable as required. This will be accomplished using various methods, including, but not limited to, progressive corrective actions or contract removal.

GAZZOLA PAVING LIMITED Revision Date: March 5, 2024

4.	Gazzola senior management, in conjunction subcontractor upon completion of the work.	with	the	Project	Manager	to	review	the

Contractor/Subcontractor Review Procedure

- 1. Project Manager to complete the subcontractor review form. (4-5)
- 2. Advise Senior Management of any issues that were identified during the review process.
- 3. Keep a record of the review in the job file.
- 4. Arrange a meeting with the subcontractor to discuss any performance issues if planning on using the subcontractor again.
 - a. Make minutes of the meeting and distribute to Senior Management, Project Manager(s), Subcontractor.

Service Provider Management:

Service providers will be managed on a case-by-case basis, based on their involvement in Gazzola's Projects and/or Head Office including the length and frequency of their involvement, the size of the service provider and the type of work performed.

Service providers may be managed on an annual basis in accordance with the description above and not by project.

Selection:

- Gazzola Project Manager to determine which and when service provider will be working on a project site.
- 2. Gazzola Project Manager to communicate service provider details to Health and Safety Coordinator and Site Superintendent.
- 3. Gazzola Project Manager may provide service provider with a copy of the Gazzola Health & Safety Program where applicable (or applicable/relevant portions).
- 4. Gazzola Senior Management or Project Manager to provide service provider with a copy of this procedure.
- 5. Service provider to provide all documentation prior to beginning work:
 - Hazard acknowledgement letter (Form 4-2)
 - Service provider Adherence to Contractors Health and Safety Program (Form 4-3)
 - Form 1000 (Where applicable)
 - WSIB clearance certificate (Where applicable)
 - Liability insurance certificate (When necessary)
 - SDS Sheets and Proof of Worker(s) WHIMS training (If applicable)
 - Additional Training Certificates as Required by all legislative acts and regulations relevant to the scope of their work (ex. Work at Height)
 - Copy of service provider's Health & Safety Policy when necessary

GAZZOLA PAVING LIMITED Revision Date: March 5, 2024

- 6. Service provider to complete transfer of Gazzola Health & Safety Program details and required documentation to any party under they employ and direction, whether directly or via a subcontract.
- 7. Service provider to ensure that all persons under their direction or employ, whether directly or via subcontract, shall be fully aware and remain compliant with this policy and all appropriate transfer of policy and expectation is completed.

Service Provider Monitoring:

- 1. Gazzola Health and Safety Coordinators and Site Superintendents/Foremen shall inspect and monitor the ongoing activities of the service provider.
- 2. Service provider to always complete necessary modifications when noted to remain compliant to all policies and legal requirements.
- 3. Gazzola Health and Safety Coordinators to note any service provider violations relative to health, safety, and environmental and bring to the attention of Gazzola Paving Ltd. senior management. This includes direct and indirect service providers. Non-compliant entities will be warned of the infraction and held accountable as required. This will be accomplished using various methods, including, but not limited to, progressive corrective actions or contract removal.
- 4. Gazzola senior management, in conjunction with the Project Manager to review the service provider upon completion of the work.

Service Provider Review Procedure

- 1. Project Manager to complete the service provider review form. (4-5)
- 2. Advise Senior Management of any issues that were identified during the review process.
- 3. Keep a record of the review in the service provider's file.
- 4. Arrange a meeting with the service provider to discuss any performance issues if planning on using the service provider again.
 - a. Make minutes of the meeting and distribute to Senior Management, Project Manager(s), service provider.

GAZZOLA PAVING LIMITED Revision Date: March 5, 2024 Health and Safety Manual

Sub-Contractor Document Submissions

Gazzola Subcontractor Health & Safety Job Start Up Mandatory Submissions

- Subcontractor Health and Safety Agreement (Form 4-1)
- Fully signed contract
- Hazard acknowledgement letter (Form 4-2)
- Subcontractor Adherence to Contractors Health and Safety Program (Form 4-3)
- Form 1000
- WSIB clearance certificate
- Liability insurance certificate
- Competent Supervisor Form (Form 4-4)
- SDS Sheets and Proof of Worker(s)WHIMS training
- Additional Training Certificates as Required by all legislative acts and regulations relevant to the scope of their work (Ex. Work at Height)
- Copy of Subcontractor's Health & Safety Policy
- Copy of Subcontractor's Workplace Violence & Harassment Policy
- Pre-Start JHA (Refer to Form 2-1-1)
- Underground Utility Locates

Gazzola Subcontractor Health & Safety Daily and Weekly Submission Requirements

* Subcontractor can submit their own forms provided Gazzola deems them to be sufficient. This means of equal or greater standard than the forms provided herein by Gazzola. *

Daily

- 1. Daily Job Hazard Assessment (Gazz card or equivalent)
- 2. Pre-Dig Utility Checklist/Locates (Form 4-6)
- 3. Traffic Protection Plan

Weekly

- 1. Weekly Site Inspection
- 2. Record of Toolbox Talk

Communication & Coordination:

Gazzola will maintain open communication channels with all workplace parties including subcontractors and service providers, especially when there is a change that will affect the Health and Safety of the work. Changes affecting workplace hazards and controls will be communicated immediately to affected subcontractors and service providers and all other interested parties through e-mail communication, site meetings/tailgate talks, and memos. Communication will be documented, and records will be kept by Gazzola's Project Management.

Gazzola, when working as the General Contractor on a project, maintains the right to lead the coordination of all Health and Safety requirements for all subcontractors.

Gazzola will enforce the Health & Safety measures and procedures prescribed by the Occupational Health and Safety Act (OHSA) and all applicable regulations to ensure the Health

GAZZOLA PAVING LIMITED Revision Date: March 5, 2024

Health and Safety Manual

and Safety of all workers on the project is protected as listed under the Constructor duties in the Occupational Health and Safety Act (OHSA).

GAZZOLA PAVING LIMITED Revision Date: March 5, 2024

Health and Safety Manual

Page 9 of 10 Review Date: March 18, 2025

DISTRIBUTION

The **Project Manager** will ensure distribution of this documentation when requested and gathering of all pertinent information during the procurement process.

The **Project Manager** and **Superintendent** will also be responsible for the distribution and gathering pertinent information to/from the Subcontractors during the Site Orientation. The **Health and Safety Coordinator** and **Superintendent** will also be responsible for the distribution and gathering pertinent information to/from the Service Providers prior to project start up.

RECORDS

All information gathered during the subcontractors/service providers management process shall remain on file for a period of at least five years.

GAZZOLA PAVING LIMITED

Revision Date: March 5, 2024

Health and Safety Manual

Page 10 of

10

Review Date: March 18, 2025

<u>4-1 Form</u> – Subcontractor Health & Safety Agreement

Com	nnany:		
	npany:		
Date	DE:		
Proj	ect/Contract #:		
to co	zola Paving Limited reminds their sub-contractors that they are required to work in comply with all applicable requirements of the Ontario Occupational Health and Sa other applicable codes and standards and in particular, the Construction Project R	fety Act reg	
Con	checklist is to be completed by the sub-contractor and reviewed at the pre-construction Project Manager and/or Health and Safety Management. Contractors are completed checklist form with them to the pre-construction meeting.		
1.	NOTICES		
	zola Paving Ltd. must be notified in writing when the Ministry of Labour has been c	ontacted. H	ave you
reac	rand understood the sections for himg notices and completing registrations?	Yes	No
•	When a critical injury or death occurs at a workplace		
•	Where an accident, explosion or fire causes injury at a workplace		
•	Accident and/or explosion		
2.	CONTRACTORS SITE SAFETY DOCUMENTATION		
		Yes	No
•	Health and Safety Policy		
•	Copy of Occupational Health and Safety Act		
•	WSIB Poster (In case of Injury)		
•	MSDS/SDS Sheets Ministry of Labour Inspection Reports Rested (If Applicable)		
•	Ministry of Labour Inspection Reports Posted (If Applicable) Registration of Contractors and Employers (Form 1000)		
•	Traffic Control Plan		
•	Name of Health and Safety Representative		
•	Name of persons trained in First Aid		
3.	HEALTH AND SAFETY REPRESENTATIVE		
	t Health and Safety Committee (required when there are more than 20 workers on ect is to last more than 3 months or when ordered by the Ministry of Labour)	the project	and the
•	Health and Safety Representative (required where the number of workers regular ordered by the Ministry of Labour)	ly exceed 5	or when
Na	me:		
Со	ntact Info:		

Page 1 of 3 Reviewed Date: March 18, 2025

<u>4-1 Form</u> – Subcontractor Health & Safety Agreement

4.	PERSONAL PROTECTIVE EQUIPMENT AVAILABLE			
••	1 EROSINE I ROTESTIVE EQUI INERT AVAILABLE	Yes	No	N/A
•	Hard Hats/Safety Footwear/Reflective Safety Clothing			
•	Safety Glasses			
•	Hearing Protection			
•	Respiratory Protective Equipment			
•	Confined Space Entry Equipment			
•	Fall Protection			
•	Other	. 🗆		
5.	CONTRACTOR STAFF TRAINING CONFIRMATION	Voo	No	NI/A
•	WHMIS Training	Yes	No □	N/A □
•	Orientation Training			
•	Traffic Control Training			
•	Confined Space Entry Training			
•	Equipment Training for Operators			
•	Equipment Operator Signaller Training			
•	Trenching/Excavation Training			
•	Working at Heights Training			
•	Use and Care of PPE			
•	Asbestos Awareness Training			
•	Fit testing of respirator			
•	Ontario Reg 297/13 – Occ. Health and Safety Awareness			
•	Other			
Сор	pies of Certificates submitted:			
6.	TRAFFIC CONTROL MEASURES		Yes	No
•	Traffic Control Plan to be provided on the field as per the MTO Traffic Co	ontrol		
	Manual for Roadway Work Operations		П	Ш
7.	SUPERVISION			
Nan	ne of Competent Supervisor:			
Con	ntact #:			
	CELL BUSIN	ESS		
8.	EMERGENCY			
Acc	ident Prevention, Reporting & Procedure	Yes	No	N/A
•	Is an Emergency Plan in Place?			
•	Are First Aid Kits available onsite?			
•	Are qualified First Aider's onsite?			
•	Emergency telephone number ()			
•	Police Non-Emergency number ()			

<u>4-1 Form</u> – Subcontractor Health & Safety Agreement

9.	CONFINED SPACES			
		Yes	No	N/A
•	Does the sub-contractor have testing equipment and procedures capable of evaluating hazards within a confined space before entry?			
•	Is the sub-contractor familiar with the confined space requirements outlined in the Occupational Health & Safety Act and Regulations?			
10.	EXCAVATIONS/TRENCHING			
		Yes	No	N/A
•	The sub-contractor understands that it is their responsibility to arrange for underground utility locates			
Тур	e of support system proposed:			
•	Timbering and Shoring			
•	Pre-fabricated support system			
•	Trench Box (liner) certified			
•	Sloping as per soil type			
•	Hydraulic support systemSheathing			
•				
	nd discuss any additional potentially hazardous conditions or operations that are he project (if required):			
Gaz	zola Paving Limited Project ager:			
Sub	-Contractor Representative:			
(I de	clare that I have answered all required questions in the application fully and trut	hfully)		
Con	npany:			
Pos	tion:			
Con	tact:			

Hazard Acknowledgement Letter

In accordance with the Health acknowledge that all employees	and Safety program of Gazzola Paving Limited, I hereby cor and/or company affiliates of	ifirm and
	have reviewed and understand all the Hazards ident	ified
(Insert Company Name)		
through our comprehensive Job	Site Hazard Assessment for	
Job/Contract No.	on	
*It is also	responsibility to	
	(Insert Company Name)	
, ,	as part of their scope of work being conducted*	
Signature	Date	
Print Name & Title		
WitnessDate	Date	
Print Name & Title		

<u>4-3 Form</u> – Subcontractor and Service Provider Adherence to Contractor's Health & Safety Program

and will continue to comply with all statu	do solemnly declare that we do now tes including the Occupational Health and Safety Act, tion, Workers Safety and Insurance and all regulations
Gazzola Paving Limited ("Gazzola"). and and employees from and against all clai statutory demands, costs, legal costs on or claimed against Gazzola arising of its of the control of the c	agree to indemnify and hold harmless the constructor's officers, directors, supervisors, agents ms, actions, legal proceedings, demands, obligations, a solicitor and his own client basis and damages made ng out of or attributable to a breach by obligations under the Occupational Health and Safety portation, Workers Safety and Insurance Board and any
	do solemnly declare that we have afety Policy and Program and will adhere to the most Statutory and Regulatory Requirements; Constructor's or's Health and Safety Program.
I/We of be notified of any incidents that requires legislated requirements in the Ontario He	, understand that Gazzola will also the Ministry of Labour, Ministry to be notified of, per alth & Safety Act.
conducted Job Hazard Assessments and	d will continue to comply with all statutes including the inistry of Labour, Ministry of Transportation, Workers
required to receive weekly tool box talks a	, understand that Gazzola will be and will continue to comply with all statutes including the inistry of Labour, Ministry of Transportation, Workers thereunder.
Signature	Date
Print Name & Title	
WitnessDate	Date
Print Name & Title	

Subcontractor Declaration of Competent Supervisor

IN THE MATTER OF: Contract work performed by:

	(Company Name)
at the	
	(Name of Project)
1. I am the	(Title)
_	(Title)
of	
	(Company Name)
and as such	have the knowledge of the matters herein stated.
2	(Company Name) is a
	(Company Name)
	(Choose one: Sole Proprietorship/Partnership/Corporation)
with its head	d office located at
	(Address)
and has car	ried on a business as a contractor since or on about
,	
•	(Insert Date)
3	has since / (Insert Date)
•	a Health and Safety Policy under section 25(2) J of Ontario's Occupational Safety Act -R.S.O. 1990, c.O1. as amended (the "Act") and has developed
	ns on an annual basis, a program to implement the written Occupational
Health and S	Safety Policy. A copy of the policy is available for inspection upon request.
4	
4	will employ for this project, a supervisor
•	rs who are competent persons as defined by section 1 (1) of the Ontarion Regulations and specifically the following person(s) who:
	alified because of knowledge, training and experience to organize the project
work a	nd its performance.
•	niliar with the Act and Regulations for Construction Projects that apply to the
	work; and nowledge of any potential or actual danger to health and safety at the project

Review Date: March 18, 2025

<u>4-4 Form</u> – Competent Supervisor

5.	will employ, for the purpose of this (Company Name)
	or any project, the following competent supervisors:
	1.
	2
	3
	4.
	No supervisors other than those named shall work on the project in a supervisory capacity.
6.	The supervisors employed by(Company Name)
	(Company Name)
	have successfully completed the necessary health and safety courses to be considered a competent person to undertake the work described in the contract.
Со	mpany Offical's Print Name
Со	mpany Offical's Signature
Da	te:

Sub-contractor and Service Provider Health & Safety Performance Review

Subcontractor Name:	Job No:		
Evaluation Criteria	Exceptional	Satisfactory	Unacceptable
Did the work get done on time?			
2) If not, were reasons			
Avoidable			
Unavoidable			
 Adherence to Gazzola's Health & Safety Program Requirements 			
 Compliance with OHSA & applicable regulations 			
5) Were specific safety Issues addressed in a timely & acceptable manner?			
6) Were all daily/weekly forms required delivered in a timely & acceptable manner?			
7) Were all incidents reported to Gazzola's Superintendents on site in a timely manner?			
8) Overall Health & Safety Performance			
Description		Number of O	ccurrences
Total number of incidents			
Total number of critical injuries repo Ministry of Labour	orted to the		
Property damage incidents			
Ministry of Labour orders			
Review Prepared by:(Name & Signature)	anature)	(Date	<u> </u>
(Name & Si	gaca. c/	(Date	-,

PRE DIG UTILITY CHECKLIST

Project Location:	Job No.:	b No.:			
		Yes	No		
Have the Locates been reviewed and marked out as per Locates to be provided to the contractor upon request)?					
Are the utility point marks in the field visible?					
Ensure all parties involved in the project are participating advance of work. Identify each type of utility that will be their locations and all measures that will be taken to local damage to each.	encountered as well as				
Ensure excavation area is outlined in "white" paint for a necessary.	dditional awareness, as				
Ensure that a copy of the locates have been given to th in the equipment.	e Operators and placed				
Identify the type, size and material of the utility that has acknowledged in advance of locating the utility.	been identified and				
Ensure the excavation to locate the utility by hand and/o existing surface to the utility without the use of mechani equipment/machinery.					
Ensure the uncovered utility matches the utility locate.					
Ensure the utility is uncovered across the full-width of the for the operator to see.	ne excavator and visible				
Ensure one or more persons as required are appointed	as dedicated spotter.				
Ensure the utility is protected by the vertical walls of the	excavation.				
Ensure you report any unsafe or pre-existing condition appear to be normal condition.	of the utility that doesn't				
Ensure all proper measures are being implemented to pwell-being of the utility is not compressed.	protect the utility and the				
Supervisor Name:					
Supervisor Signature	Date:				



GAZZOLA PAVING LIMITED Company Rules Policy Statement

Gazzola Paving Limited has established Company Rules to express the expectations from all employees regarding their behaviour towards co-workers, supervisors, management and the whole company while at work. Since every employee is responsible for Health and Safety in the workplace and to be active and assist in making the workplace safer, the Company Rules has also included basic company safety rules. Company Rules as a whole apply to every person at Gazzola Paving Limited regardless of their title or job duties.

Gazzola Paving Limited will ensure that written company rules are available as both standard and workplace specific rules and will ensure that the written copies are provided to each employee as part of the Annual Orientation.

Gazzola Paving Limited expects all employees to comply with the company rules and will ensure consistent enforcement of these rules through supervisors and management in all work locations. If any employee violates the company rules, the progressive discipline policy and procedure will apply.

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

Virgil Gazzola, Vice President

March 18, 2025

Date



GAZZOLA PAVING LIMITED Employee Code of Conduct Policy

The Gazzola Paving Limited Code of Conduct brings together a number of existing Gazzola policies and provides additional guidance to all employees ensure compliance.

Gazzola Paving Limited ("Gazzola") conducts its business with integrity and respect for candidness, truthfulness, and high standards of business ethics. The organization requires that its employees and business partners adhere to these high standards. All employees of Gazzola's operating companies, must fulfill their responsibilities with honesty and integrity, and must comply with all applicable laws and regulations.

Gazzola provides a positive and ethical work environment that supports doing what is right, respecting others, and performing with high standards.

Scope:

This policy applies to all of the Gazzola operating companies.

Communication:

This policy is communicated to all employees of the Gazzola operating companies through the 4S Training platform.

Code of Conduct Policy:

Our Core Values

Honesty

We are open, candid and truthful.

Integrity

- Our word is our bond. We do what we say.
- We live up to the highest standards of fairness and ethical behavior.

Respect

- We work hard to earn our business partners' trust and respect on every project.
- We are all responsible for building and protecting our reputation as the contractor of choice.

Passion

- We love what we do.
- We take the lead, and we lead by example.

Our Commitment

In support of our core values, each employee, of a Gazzola company, commits to abide by this Code of Conduct. Each of those persons also commits to abide by all the policies referenced in this code that are relevant to that person. Violations will be the cause for corrective action, which may result in disciplinary action up to and including termination of employment or services contract.

Obey the Law & Act Ethically

We will conduct our business in accordance with all applicable laws and regulations. We will conduct our business in accordance with the highest standards of ethics. Most ethical problems can be avoided by exercising common sense.

Revision Date: March 15, 2022 Page 1 of 3



GAZZOLA PAVING LIMITED Employee Code of Conduct Policy

The following statements are warning signs that you are on ethical thin ice:

- · "Well, maybe just this once. . ."
- · "No one will ever know."
- "It doesn't matter how it gets done as long as it gets done."
- "It sounds too good to be true."
- · "Everyone does it."
- · "Shred that document."
- · "We can hide it."
- · "No one will get hurt."
- "What's in it for me?"
- · "This will destroy the competition."
- · "We didn't have this conversation."
- "This is a 'non-meeting'."

You can probably think of many more phrases that raise warning flags. If you find yourself using any of these expressions, stop, think and ask yourself, "Am I acting ethically?"

When confronted with a situation which raises a concern, ask yourself:

- · Are my actions legal?
- Am I being fair and honest?
- Will my actions stand the test of time?
- · How will I feel about myself afterwards?
- · Would I think that others were acting unethically if they acted this way?
- · How would it look in the newspaper?
- · Will I sleep soundly tonight?
- · What would I tell my child to do?
- · How would I feel if my family, friends and neighbors knew what I was doing?

Promote a Positive and Ethical Work Environment

We will provide a positive and ethical work environment that supports doing what is right, respecting others, and performing with high standards. We must be careful in our words and our conduct to avoid placing, or seeming to place, pressure on others that could cause them to deviate from acceptable ethical behavior. While all of us must contribute to the creation and maintenance of such an environment, our executives and management personnel assume special responsibility for fostering a positive and ethical work environment

The following conducts and/or behaviours by an employee, while not all-inclusive, are serious infractions that may result in immediate suspension (with pay) pending further investigation. Subsequent termination for cause may occur for the following:

- Theft in any form of company, co-worker and/or client property;
- Falsification of Company records, including timecards or buddy punching, or falsifying client records;
- Illegal gambling as described by the Criminal Code of Canada on Gazzola property and/or on Gazzola paid time;
- Taking part in any illegal activity on Gazzola property;
- Use of profanity, threatening, abusive and/or seriously offensive language or actions in the workplace;

Revision Date: March 15, 2022 Page 2 of 3



GAZZOLA PAVING LIMITED Employee Code of Conduct Policy

- Possession or use of alcoholic beverages, narcotics or illegal drugs on Gazzola premises.
- Reporting/returning to work under the influence of same;
- Failing to advise to your Manager/Supervisor if you are taking a prescribed drug which may dangerously impair your judgement and cause harm to you or your co-workers;
- Physical altercations on Gazzola premises. Examples of physical altercations include actual or attempted physical attacks or threats of exercising physical attacks such as:
 - Punching
 - Shoving
 - Hitting
 - o Biting
 - Kicking
 - Sexual assault
 - Scratching
 - Spitting
- Harassment of any nature, including but not limited to verbal or sexual harassment;
- Indecent or immoral conduct; and
- Disregard for safety policies and/or procedures.

The following conducts and/or behaviours, while not all-inclusive, if repeated, are considered action that will be subject to disciplinary action up to and including termination for cause:

- Disorderly conduct which causes disruption to clients or co-workers;
- Actions which willfully, or with gross negligence, cause the destruction or damage to Gazzola property or that of co-workers;
- Conducting personal, non-business functions during working hours, including, but not limited to, use of personal cell phones (whether for texting or taking calls in undesignated areas), sleeping, or reading personal materials (including novels, magazines and/or newspapers);
- Insubordination;
- Smoking in non-designated areas;
- Participating in the spreading of malicious gossip, damaging rumours and/or engaging in behaviours that will result in an inharmonious workplace;
- Engaging in pranks, contests, feat of strength, unnecessary running or rough and boisterous conduct;
- Eating and/or storing food in non-designated areas;
- Creating or contributing to unsanitary conditions;
- Conversations of an offensive nature occurring in the workplace; and
- Unauthorized personal use of telephones, computers, vehicles or any other employerowned equipment.

Virgi Gazzola, Vice-President	March 18, 2024
Virgi Gazzola, Vic - resident	Date

PURPOSE

To express the expectations from all employees regarding their behaviour towards co-workers, supervisors, management and the whole company while at work.

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.

SCOPE

Every employee is responsible for workplace Health and Safety - be active and assist in making the workplace a safer place to work by following all company rules, policies and procedures

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

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Assisting in the development and review of the Company rules.
- Ensuring Company rules are clearly explained and understood by all employees.
- Ensuring a copy of the written Company rules provided to each and every employee annually as part of the Annual Orientation.
- Assisting in the development of the Progressive Discipline Policy.
- Schedules and conduct discipline meetings with employees as required.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Maintain the documentation and records of Progressive Discipline.

Senior Management Responsibilities:

- Develop and review as required the Company rules (Standard & Site Specific).
- Ensure Company Rules are applied and consistently enforced on all work locations through managers and supervisors.
- Develop and review as required the Progressive Discipline Policy.
- Follow up on Supervisory 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 measures and procedures prescribed are carried out in the workplace.

Project Manager Responsibilities:

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

GAZZOLA PAVING LIMITED Revision Date: August 18, 2024

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

Superintendent Responsibilities:

- Ensuring all workers know and understand the Company Rules.
- Ensuring all workers are following the Company rules on all work locations under their supervision.
- 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:

- Regularly communicate performance expectations with Subcontractors and workers and to confirm expected consequences of non-compliance.
- Ensuring this policy is applied objectively, promptly and consistently to all Subcontractor and worker.
- Take prompt and appropriate action any workplace party is working in an unsafe or ineffective manner.
- Documenting all disciplinary activities on the appropriate form and report to the Superintendent.
- 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 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.

GAZZOLA PAVING LIMITED Revision Date: August 18, 2024

COMPANY RULES PROCEDURE

Gazzola Paving Limited has developed written standard and site-specific company rules that will apply to all employees regardless of their rank or position.

Management will ensure company rules (Standards and Site-specific) are clearly explained and understood by all employees upon hiring and regularly by ensuring a written copy of the company rules is provided to each employee at least annually as part Annual Orientation.

Senior Management will monitor to ensure the implementation and consistent enforcement of the company rules throughout the whole organization through Managers and Supervisors. Any employee to be found in violation with the Company rules may be disciplined according to the progressive discipline policy.

STANDARD COMPANY RULES

Personal Electronic Devices: Personal electronic devices (including cellular phones, music devices and radios) are not permitted to be used while working and shall remain with personal belongings (out of sight) during working hours. Electronic earbuds and headsets for music devices and cellular phone are not to be used.

Personal Protective Equipment (P.P.E.): Minimum P.P.E. for projects and the Asphalt Plant consists of: C.S.A. Type 1 Class E hardhat, C.S.A. 'Green Patch' safety boots, C.S.A. Class 2 or equivalent high visibility vest or jacket and C.S.A approved safety eyewear.

Specialized Personal Protective Equipment: In order to undertake some workplace tasks, specialized PPE must be worn. (i.e. Working at Heights, Confined Spaces, Grinding of Asphalt containing Asbestos) Specialized PPE will be provide by Gazzola when required.

Clothing: For worker protection clothing should not be loose or torn. Boot soles should not be oily or slippery. The wearing of rings, bracelets and necklaces should be avoided and hair longer than shoulder length should be secured so it does not present a hazard. Sleeveless shirts and shorts are not allowed on construction projects, at the shop or at the asphalt plant. Hand, face and skin protection are to be worn when required to protect the worker from potential hazards.

No Smoking or Vaping: 529 Carlingview Drive and 345 Attwell Drive are completely smoke and vaping free properties. Furthermore, as per the Smoke Free Ontario legislation, smoking is prohibited in any of Gazzola's vehicles and equipment. Smoking is strictly prohibited near flammable or combustible gases and materials. Obey all 'No Smoking' signs.

Zero Tolerance for Drugs and Alcohol: Drugs and alcohol are not permitted on company property, in company vehicles or on projects. Any worker found in possession of or under the influence of drugs or alcohol will be disciplined up to and including dismissal. All employees are expected to be Fit for Duty when reporting for work.

Prescription Medications: Tell your Foreman/Superintendent of any prescription medication you are taking that may impair your ability to work safely and/or operate vehicles and equipment.

Reporting Injuries, Vehicle Accidents, Incidents & Near Misses: All injuries, vehicle accidents, incidents, and 'near misses' - no matter how minor - must be reported immediately to your Foreman/Superintendent. The Foreman/Superintendent will conduct his/her investigation and report it to management.

Reporting Unsafe Practices and Conditions: Workers are obligated by law (and Gazzola Paving Limited) to report unsafe practices or hazardous conditions immediately to your Foreman/Superintendent so that corrective action can be taken.

Zero Tolerance for Violence and Harassment: All reported cases of violence and harassment will be investigated and any worker found to be involved will be disciplined, up to and including dismissal.

Code of Conduct: All employees shall adhere to the Gazzola's Code of Conduct Policy and work within the core values noted of Honesty, Integrity, Respect and Passion.

SITE SPECIFIC COMPANY RULES

Placement of Tools and Materials: Never place tools or materials near edges / openings, as these items may fall onto someone below. Keep all tools and materials at least six feet back from edges and openings.

Heavy Lifting: Always seek assistance or use mechanical lifting devices when attempting to lift heavy material. Avoid awkward postures and use proper lifting techniques.

Path of Travel Safety: Avoid the path of travel of machinery. The Safe Limit of Approach is three meters from skid steers and ten meters from all other machinery and vehicles. When operators must enter Safe Limit of Approach zone, they must slow the equipment or machine to walking speed and not make any sudden movements.

Skid Steer Safety: Operators are to avoid sudden fast spinning and reversing movements as ground workers will have difficulty anticipating and reacting to movement.

Backing Vehicles and Equipment: Operators are to avoid reversing whenever possible. When the operator's view of the intended path of travel is obstructed, a signal person must be used to direct the operator. The signal person shall stand in a position that is in clear view of the operator but not in the intended path of travel. The operator is to stop backing immediately, put the vehicle in park and await further instruction (or get out and survey the scene personally) if visual contact is lost with the signaler (and/or any other workers) and if an Emergency Stop signal is sounded.

Equipment Operator Qualifications: Do not operate any equipment/machinery unless you have been given proper instruction and authority to do so.

Daily Vehicle and Equipment Inspection Checklists: Daily checklists are to be completed prior to operating mobile vehicles and equipment. Completed checklists are to be submitted for review and filing.

Riding on Equipment: No one should be riding in or on equipment unless they are in a proper seat with a seatbelt.

Reviewed Date: March 18, 2025

Seatbelts: Seatbelts must be worn in all vehicles and when operating machines that have seatbelts.

Horseplay: Do not engage in any prank, contest, unnecessary running or boisterous conduct.

Power Tools: All electrical hand tools shall be grounded or double insulated.

Avoid Working Alone: Always use the 'Buddy System' to avoid working alone. If it is necessary, arrangements should be made by the foreman to check on the worker at regular intervals.

Compressed Gas Cylinders: All cylinders shall be transported, stored and secured in an upright position with the protective cap in place.

Do Not Remove: Do not remove or make ineffective, any protective device, equipment or thing, required by Gazzola or the Act and Regulations (i.e. seatbelts, guards, etc.). If your work requires the removal of a protective device, use appropriate safety measures to protect yourself and others; and when the work is finished (or you leave the area), replace the protective device immediately. Report any missing or defective protective devices to your Foreman/ Superintendent. Do not remove a Lock-Out-Tag-Out lock that you did not personally apply.

Designated Substances: If a worker comes into contact (or thinks they may come into contact) with a designated substance as prescribed under the Occupational Health and Safety Act and Regulations (i.e. asbestos, lead, mercury, etc.), the worker will stop working and immediately report it to their Foreman/ Superintendent for investigation and corrective action.

PROGRESSIVE DISCIPLINE POLICY

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

The Progressive Disciplinary Policy is as Workers, Foreman, Subcontractors or others 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, or suspension or dismissal

The 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 or a Subcontractor, the following steps must be followed as a minimum;

- 1. The Worker or Subcontractor must be asked to stop work and proceed to a private location or appropriate safe location.
- 2. The **Superintendent/Foreman**, or **Senior Management** must be present when the disciplinary actions are taken and recorded on the 4S electronic platform (Disciplinary Warning Form).
- 3. The Worker or Subcontractor must be notified in writing of the reason for the disciplinary actions.

Reviewed Date: March 18, 2025

- 4. The Worker or Subcontractor must also be given a chance to defend or explain his/her actions.
- Documentation of the disciplinary actions may include a disciplinary letter by Senior Management and the Health and Safety Coordinator as well as the involved worker or Subcontractor.

Note:

- (1) Termination of a worker's employment can only be done with the consent of **Senior Management.**
- (2) 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

DISTRIBUTION

Those employees being hired will be required to complete orientation on-line training with knowledge tests stipulating that they have received, read and understood the company orientation package and expectations.

Subsequent, where a new process or guideline is developed and at least annually, **Health and Safety Coordinator** will revise the orientation package and schedule the revised guidelines to be delivered to all workplace parties.

The distribution of the Progressive Discipline Policy will be performed by each **Superintendent** OR **Foreman** using the following steps:

- 1. Orientation with all workers to explain the Progressive Discipline Policy.
- 2. Communicated during Tailgate Safety Talks where required.

RECORDS

All completed checklists and acknowledgement sheets should be maintained on the employees file indefinitely.

If Progressive Discipline is used, the Superintendent, <u>must</u> ensure records are submitted on the 4S electronic platform and communication of the action taken is provided to the Senior Management and or Health and Safety Coordinator immediately for review. This information is to be maintained in the employee file indefinitely.

GAZZOLA PAVING LIMITED Revision Date: August 18, 2024



GAZZOLA PAVING LIMITED Personal Protective Equipment Policy Statement

At Gazzola Paving Limited, while Personal Protective Equipment are considered a minimum control method to protect from hazards, they are required to be used by everyone at Gazzola Paving Limited including management, supervisors, workers, sub-contractors and suppliers.

To that purpose, Gazzola Paving Limited commits to implement Personal Protective Equipment Programs to ensure all activities requiring PPE are documented. Gazzola Paving Limited will ensure that all employees are provided with PPE that are suitable for the task they are performing, and that a proper replacement process for PPE is in place when needed.

At a minimum, the following requirements must be followed:

- Construction Projects: Hardhat, Safety Boots, High Visibility Vest. Safety Glasses when necessary
- Asphalt Plant: Hardhat, Safety Boots, High Visibility Vest & Safety Glasses
- Asphalt QC Lab: Safety Boots, Safety Glasses when necessary & Respiratory Protection when necessary
- **Snow Operations**: Safety Boots & High Visibility Vest. Hard Hat when outside of vehicle. Safety Glasses when necessary
- Gazzola Paving Office: No PPE Required
- Gazzola Paving Shop: Safety Boots (and Safety Glasses as required)
- Gazzola Paving Yard: Hardhat, Safety Boots, High Visibility Vest. Safety Glasses when necessary

The PPE program will clarify all criteria used for the selection of the Personal Protective Equipment including the legislative requirements and the types of activities performed.

Gazzola Paving Limited will use specific written rules and guidelines for the proper fitting, care and use of different types of PPE and will ensure that all employees are trained on and aware of these rules.

It is the responsibility of all workers to inspect their Personal Protective Equipment daily before each use and to maintain them in good condition. PPE maintenance and inspections must follow the legislative and manufacturer's requirements.

Virgil Gazzola, Vide President

March 18, 2025

Date

PURPOSE

The following Personal Protective Equipment (PPE) procedure will be used to identify the specific requirements for the use of PPE.

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.

SCOPE

The use of Personal Protective Equipment falls into the third and least desirable control method (Control at the Worker). Control at the Worker will only be considered as a supplement to another control method and/ or if it is the most practical method.

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Arrange with the Superintendent for all company supplied and site specific PPE to be purchased and distributed.
- Arrange for general (orientation) and specific (Working at Heights) training is provided as required.
- 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.

Senior Management Responsibilities:

- Assist in development of the PPE Program.
- Ensure the appropriate PPE is implemented across all areas of responsibility.
- 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 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:

- Arrange with the Health and Safety Coordinator for all company supplied and site specific PPE to be purchased and distributed.
- Ensure a site specific PPE for all workplaces and sites is used, maintained and in place.
- Distribute new and replace PPE as 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:

- Ensure known site related hazards are defined with a site specific plan or Hazard Assessment and appropriate PPE is defined and provided as required.
- Distribute new and replace PPE 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.

Workers Responsibilities:

- Use and maintain all required PPE as directed.
- 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.

PROCEDURE

The **Health and Safety Coordinator** with the assistance of the **Senior Management** will develop a Personal Protective Equipment Program.

All required workers will receive PPE specific online training regarding their selection, fit, use/care and limitations of their PPE with applicable demonstrations where required.

DISTRIBUTION

The specific requirements for PPE will be documented and communicated to all workers, along with appropriate warning signs.

RECORDS

Documentation of Safety Talks and/ or online training of employees will remain on file electronically and on the company servers.

PERSONAL PROTECTIVE EQUIPMENT PROGRAM

INTRODUCTION

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. Required PPE will be documented for each task/activity on the applicable Workplace Task Standards (WTSs). Management, Superintendents and foremen must ensure the appropriate required PPE in accordance with the WTSs for all activities are provided and made available to workers at the shop, yard and on all project sites.

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.

All employees will be trained on the limitations, inspections and proper care and maintenance of their Personal Protective Equipment by the Health and Safety Coordinator in accordance with the legislative requirements and manufacturer's specifications. PPE Inspection will be performed daily by all workers in accordance with these instructions and recorded on the Daily GAZZ Card

Health and Safety Coordinator and Foreman / Superintendent are responsible to ensure that the PPE and equipment required for the project are present and, functional at all times and followed by all workplace parties including Managers and Sub-contractors.

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:

- Legislative references
- Selection guidelines
- Fitting guidelines
- Use guidelines
- Care guidelines

Basic PPE

1- Head Protection:

References:

- Construction Projects Regulation 213/91: Section 22
- CSA Z94.1 Industrial protective headwear –Performance, selection, care and use

Selection Guidelines:

- When selecting protective headwear, consider the type of hazards that may be encountered.
- Protective headwear must meet CSA Z94.1 and display the certification mark.
- The following additional considerations are to be used when selecting protective headwear:
 - Compatibility with other PPE that may be worn.

- Consider sizing and fit of head protection.
- Meet the requirements for head protection as specified Regulations for Construction Projects (Must protect the wearer head against impact and against small flying or falling objects, and must be able to withstand an electrical contact equal to 20, 000 volts phase-to-ground).
- Both parts of the headwear (shell and suspension) must be compatible and maintained according to manufacturer's instructions. If attachments are used with headwear, they must be designed specifically for use with the specific headwear used.
- Classes of headwear can include:
 - Type 1 protection from impact and penetration at the crown (top) and
 - Type 2 protection from impact, penetration at the crown (top) and laterally (sides)
- Each type is also available in the following classes:
 - Class E (20 000 V electrical rating) non-conducting material (electrical trades)
 - o Class G (2200 V electrical rating) non-conducting material (general trades)
 - Class C (no electrical rating)

Fitting Guidelines:

- Ensure proper fitting of headwear to head shape.
- Gradually tighten or adjust the strap until it is secure but comfortable. When properly tightened the headwear is not likely to fall from the head when the user shifts head side to side or leans forward.

Use Guidelines:

- Head protection must be worn when there is a risk of injury to the head due to impact, penetration or potential contact with electrical hazards. Head protection is worn when:
 - Objects may fall or strike from overhead.
 - There is the risk of bumping heads against a fixed object.
 - There is the possibility of accidental head contact with electrical hazards.
- Hard hat should be worn facing forward (the only time a hard hat can be worn in reverse is
 if the hard hat has a reverse orientation mark).

Care Guidelines:

- Proper care is required for headwear to perform efficiently. Its service life is affected by many factors, including temperature, chemicals, sunlight, and ultraviolet radiation (welding). The usual maintenance for headwear is simply washing with mild detergent and rinse thoroughly. Store hard hat away from direct sunlight. Always consult the manufacturer's instructions for use and care instructions.
 - Do inspect the headwear and its components.
 - o Do replace headwear that is pitted, holed, cracked or brittle.
 - Do replace headwear that has been subjected to a blow even though damage cannot be seen.
 - o Do remove from service any headwear if its serviceability is in doubt.
 - Do consult regulations or supplier for information on headwear, and when to replace equipment.
 - o Do not drill holes, alter or modify the shell. Alterations may reduce the protection provided by the headwear.

- Do not use solvents or paints on the shell (paint solvents can make plastic headwear brittle and more susceptible to cracks)
- o Do not put chin straps over the brims of certain classes of headwear.
- o Do not use any liner that contains metal or conductive material.
- O Do not paint, make holes or attach accessories unless in accordance with manufacturer's specifications.

2- Foot Protection:

References:

- Construction Projects Regulation 213/91: Section 23
- CSA Z195.1 Guideline on Selection, Care and Use of Protective Footwear

Selection Guidelines:

- Foot protection for construction projects must be a CSA-certified Grade 1 work boot
- Protective footwear shall be a safety shoe or safety boot with the following features:
 - A box toe that is adequate to protect the wearer's toes against injury due to impact and is capable of resisting at least 125 joules impact
 - A sole or insole that is adequate to protect the wearer's feet against injury due to puncture and is capable of resisting a penetration load of 1.2 kilonewtons when tested with a Deutsche Industrie Norm standard pin.
- Grade 1 boots can be identified by the following markings:
 - A green triangular patch containing the CSA logo on the outside of the boot
 - o A green label indicating Grade 1 protection on the inside of the boot
 - o Grade 1 boots are also available with metatarsal and dielectric protection. A white label with the Greek letter Omega, □, in orange means that the boot protects against electric shock under dry conditions.

Fitting Guidelines:

- Walk in new footwear to ensure it is comfortable.
- Footwear should have ample toe room.
- Footwear should fit snugly around the heel and ankle when laced.
- Lace up boots fully. High-cut boots provide support against ankle injury.

Use Guidelines:

- Protective footwear must be worn to protect from falling or rolling objects and crushing or penetrating materials. Protective footwear should be worn when the following potential hazards are present:
 - o Heavy objects such as barrels or tools may roll or fall on worker's feet
 - o Working with sharp objects such as nails that can pierce the soles or uppers of shoes
 - Working around hot, wet or slippery surfaces
 - Possible exposure to corrosive or irritating substances
 - Possible explosive atmosphere includes the risk of static electrical discharges

Care Guidelines:

- Always consult the manufacturer's instructions for maintenance requirements.
 - Do inspect footwear regularly for damage (e.g., cracks in soles, breaks in leather, or exposed toe caps).
 - o Do repair or replace worn or defective footwear.
 - o Do choose footwear according to the job hazard and approved standards.
 - Do choose a high-cut boot to provide ankle support.
 - o Do not wear defective footwear (i.e. exposed steel toe caps, holes, etc).
 - Do not modify footwear.
 - Do lace up boot and tie laces securely.

Specialized PPE

3- Eye & Face Protection:

References:

- Construction Projects Regulation 213/91: Section 24
- CSA Z94.3.1 Guideline for selection, use and care of eye and face protectors
- CSA Z94.3 Eye and Face Protectors

Selection Guidelines:

- In order to ensure the proper eye protection to be worn, potential hazards must be identified
 and the appropriate type of eyewear selected, maintained and worn. Consult with the PPE
 manufacturer about the uses and limitations for each type of eye or face protection.
- The first type, "basic eye protection", includes:
 - Eyecup goggles
 - Monoframe goggles and spectacles with or without side shields
- The second type, "Face Protection", includes:
 - Metal mesh face shields for radiant heat or hot and humid conditions.
 - Chemical and impact resistant (plastic) face shields
 - O Welder's shields or helmets with specified cover
 - Filter plates and lens
- Regular prescription eyewear does not provide adequate protection and must not be used in place of eye and/or face protection. Over-the-glasses protectors (oversized protectors to be worn over prescription eyewear) should only be used by those who require only occasional protection.
- All PPE components must be CSA-Certified (e.g. lenses, frame, side shields, etc.)

Fitting Guidelines:

- Ensure your eye and face protection fit properly. Safety glasses should fit snugly without eyelashes hitting lenses.
- Eye and face protection should be individually assigned and fitted.
- Wear eye and face protection so that the temples fit comfortably over the ears. The frame should be as close to the face as possible and adequately supported by the bridge of the nose.
- Eye and face protection should be functional with other PPE that may be worn and the user should have unrestricted vision and movement.

Use Guidelines:

- Eye and face protection is PPE designed to protect against impact, splash and radiation hazards. Workers who may be exposed to eye or face hazards must wear appropriate PPE. Examples of hazards include the following:
 - Flying particles
 - Molten metal
 - Liquid chemicals
 - Acids or caustics
 - Harmful Light
 - Chemical Gases or Vapours

Care Guidelines:

Always consult the manufacturer's instructions for maintenance requirements.

- Clean your eye and face protection daily. Avoid rough handling that can scratch lenses.
- Store your eye and face protection in a clean, dry place where they cannot fall or be stepped on.
- Replace scratched, pitted, broken, bent or ill-fitting glasses. Damaged glasses interfere with vision and do not provide protection.
- Replace damaged parts only with identical parts from the original manufacturer to ensure the same safety rating.

4- Hearing Protection:

References:

- Noise Regulation 381/15
- CSA Standard Z94.2 Hearing Protection Devices

Selection Guidelines:

- Select hearing protection that is:
 - Correct for the job.
 - o Provides adequate protection.
 - Comfortable enough to be accepted and worn.
- Noise Exposure Levels
 - Before choosing a hearing protector, it's important to find out the level of noise exposure that a worker will face throughout an entire working day.
 - The types of HPDs that will be used are earplugs or earmuffs. Earplugs attenuate noise by plugging the ear canal. Earmuffs cover the external part of the ear, providing an acoustical seal.
- The table below provides guidelines for proper selection of HPDs based on class and noise exposure, presuming a desired effective exposure of L(EX), 8h = 85 dBA when HPDs are worn.

Level of Noise Exposure LEX (dBA)	Class
≤90	C
91 to 95	B or BL*
96 to 105	A or AL*
> 105	Dual

- AL or BL class HPDs meet the requirements for either Class A or Class B and have a minimum attenuation of 20 dB at 125 Hz.
- Dual hearing protection is required (Class B earmuff and Class A ear plug). Limit exposure duration. Octave-band analyses required for attenuation predictions and more frequent audiometric testing required.

Fitting Guidelines:

- Earmuffs
 - Earmuffs should conform to the latest issue of CSA Standard Z94.2.
 - The cup part of the earmuff should fit snugly over the entire ear and be held firmly in place by a tension band.
 - o The cup and band should not be so tight as to cause discomfort.
 - Cup, cushion, and band should be checked for possible defects such as cracks, holes, or leaking seals before each use of the HPD.

- Because band tension can be reduced over a period of time, the band may require repair or replacement.
- Defective or damaged parts should be repaired or replaced as needed. Tension band, cushions, and cups are readily replaceable. Consult the manufacturer's instructions for information related to the selection, care, and use of earmuffs.
- Earplugs
 - Earplugs should conform to the latest issue of CSA Standard Z94.2.
 - Because the ear canal is slightly S-shaped, the ear must be pulled back to straighten the canal for the plug to fit properly.
 - Earplugs must be fitted snugly in the ear canal.
 - Earplugs with torn or otherwise damaged flanges should be replaced.

Use Guidelines:

- Gazzola will protect workers from overexposure to noise and ensure that no worker is exposed to a sound level greater than an equivalent sound exposure level of 85 dBA over an 8-hour work period.
- Engineering and administrative controls will be used to reduce noise at the source or along the path, where workers are exposed to levels above 85 dBA over an 8-hour period.
- If it is not possible to control noise at the source or along the path, personal protective equipment (PPE) such as hearing protection devices (HPDs) will be used to control noise at the worker.
- The proper HPDs must be selected based on the jobsite conditions and must provide adequate training and instruction on the HPDs workers will be using.
- A hearing protection device shall be selected having regard to:
 - Sound levels to which a worker is exposed;
 - The attenuation provided by the device; and
 - o The manufacturer's information about the use and limitations of the device.
 - A hearing protection device shall be used and maintained in accordance with the manufacturer's instructions
- Any worker who uses an HPD will be provided with adequate training and instruction in the care and use of the device, including its limitations, proper fitting, inspection and maintenance and, if applicable, cleaning and disinfection.

Care Guidelines:

- Clean your hearing protection and replace, as required by manufacture instructions.
- Avoid rough handling and accumulation of dirt that can damage or ruin the plugs.
- Store your hearing protection in a clean, dry place where they cannot fall or be stepped on.
- Replace damaged or soiled plugs. Damaged pods interfere with hearing protection, and dirt build up can hurt/injure your ear and do not provide protection.
- Replace damaged parts only with identical parts from the original manufacturer to ensure the same safety rating.
- Do not modify your equipment.
- Clean with mild soap and warm water only. Pat dry with a towel. Do not treat with any other substances, as the earplugs may degrade and compromise use. Single use earplugs should be discarded after each use.

5- **High Visibility Protection:**

References:

- Construction Projects Regulation 213/91: Section 69.1
- CSA Z96-15 High-Visibility Safety Apparel Standard

Selection Guidelines:

- To comply with the CSA Standard, the Hi-Visibility Protection should meet the following criteria for the stripes/bands:
 - A waist-level horizontal stripe/band that goes completely around the High Visibility Safety Apparel (HVSA).
 - o Two vertical stripes on the front passing over the shoulders and down to the waist.
 - o A symmetric "X" on the back extending from the shoulders to the waist.
 - o For Class 3 apparel, stripes/bands encircling both arms and both legs are added.
- CSA lists three classes of garments based on body coverage provided. Each class covers
 the torso (waist to neck) and/or limbs according to the minimum body coverage areas
 specified for each class.
 - Class 1 provides the lowest recognized coverage and good visibility.
 - Class 2 provides moderate body coverage and superior visibility.
 - Class 3 provides the greatest body coverage and visibility under poor light conditions and at great distance.
- As per the Construction Project regulations, any worker who may be endangered by vehicular traffic on a project must wear a garment that covers the upper body and provides a high level of visibility. The reflective garment must:
 - o The garment shall be fluorescent blaze or international orange in colour.
 - On the front and the back, there shall be two yellow stripes that are 5 centimetres wide. The yellow area shall total at least 500 square centimetres on the front and at least 570 square centimetres on the back.
 - On the front, the stripes shall be arranged vertically and centred and shall be approximately 225 millimetres apart, measured from the centre of each stripe. On the back, they shall be arranged in a diagonal "X" pattern.
 - The stripes shall be retro-reflective and fluorescent.
- If the garment is a vest, it shall have adjustable fit.
- A nylon vest shall also have a side and front tear-away feature
- In addition, a worker who may be endangered by vehicular traffic during night-time hours shall wear retro-reflective silver stripes encircling each arm and leg, or equivalent side visibility-enhancing stripes with a minimum area of 50 square centimetres per side.

Fitting Guidelines:

- For safety and best performance, garments should be fitted to the person. Don't forget to
 consider the bulk of clothing that might be worn underneath the garments, and how the
 garment should be worn (i.e., done up properly around the body with no loose or dangling
 components). The garments should sit correctly on your body and stay in place during your
 work.
- The apparel should be comfortable to wear the parts of the apparel that come into direct contact with the worker should not be rough, have sharp edges, or projections that could cause excessive irritation or injuries. The apparel should also be lightweight.
- Garments should be selected and worn so that no other clothing or equipment covers the high-visibility materials (e.g., glove gauntlets, equipment belts, and high-cut boots).

Use Guidelines:

High-visibility protection is needed when working where there is low light and poor visibility, especially when working around moving vehicles (cars, trucks or other machinery traveling under their own power - e.g., forklifts, backhoes, etc). High-visibility items allow the worker to be spotted by the drivers of those vehicles sooner and more readily.

Care Guidelines:

- Always follow the manufacturer's instructions for care and cleaning of High-Visibility Protection Equipment.
 - Keep your high-visibility apparel clean and well-maintained. Contaminated or dirty retroreflective materials provide lower visibility.
 - Replace garments that show signs of wear and tear, soiling, or contamination as it will
 no longer be able to provide acceptable levels of visibility.

6- Hand Protection:

References:

Safety Data Sheets

Selection Guidelines:

- Always refer to the manufacturer instructions and/or Safety Data Sheets when selecting hand protection.
- Types of Hand Protection:
 - Leather, Canvas or Metal Mesh Gloves: These types of gloves protect against cuts, burns and punctures.
 - Fabric and Coated Fabric Gloves: These types of gloves are made of cotton or other fabric. They generally protect against dirt, chafing and abrasions.
 - o **Insulating rubber gloves:** These gloves are used for protection against electrical hazards.
 - Chemical and liquid resistant gloves: When working with chemicals with a high acute toxicity, working with corrosive materials in high concentrations, handling chemicals for extended periods of time or immersing all or part of a hand into a chemical, the appropriate glove material should be selected, based on chemical compatibility.
- Other Considerations:
 - Dexterity
 - o Glove thickness
 - Glove length
 - Glove size

Fitting Guidelines:

 Follow manufacture instructions when choosing the right glove size. Make sure that the gloves fit properly and are comfortable to wear.

Use Guidelines:

- All gloves should be inspected for signs of degradation or puncture before use.
- Disposable gloves should be changed when there is any sign of contamination. Reusable gloves should be washed frequently if used for an extended period of time.
- Gloves should not be worn where there is a risk of being caught in moving machinery parts.

Care Guidelines:

Follow the manufacturer's instructions for washing and caring of hand protection.

7- Respiratory Protection:

References:

- O. Reg. 833: Control of Exposure to Biological or Chemical Agents
- CSA-Z94.4-11: Selection, Use and Care of Respirators
- Safety Data Sheets
- NIOSH

Selection Guidelines:

- Personnel conducting respirator selection shall understand and comply with the limitations
 of the selected respirators under the conditions of use.
- Personnel conducting respirator selection should consider extraordinary circumstances in the operations that could adversely affect the function of a respirator (e.g., extreme cold or radiant heat, hypobaric or hyperbaric conditions). Advice should be sought from the manufacturer's technical experts.
- Respirator selection shall be based on a systematic review of the hazards and knowledge
 of standards, regulatory criteria, and manufacturers' information on the types of respirators
 and their limitations to ensure that appropriate respirators are selected for the intended
 conditions of use. Refer to CSA-Z94.4-11 standards for respirator selection requirements.

For the purpose of selection, respirators shall be grouped as follows:

- atmosphere-supplying respirators
 - self-contained breathing apparatus (SCBA) (pressure-demand, open- or closed-circuit)
 - o airline (pressure-demand or continuous-flow)
 - o multi-functional (a configuration incorporating both SCBA and airline)
- air-purifying respirators, non-powered (APR) and powered (PAPR)
 - gas- and vapour-removing;
 - o particulate-removing;
 - o gas-, vapour-, and particulate-removing
 - o multi-functional (a configuration incorporating both APR and PAPR)
- combined respirator (a configuration incorporating both atmosphere-supplying and airpurifying)
- escape-only respirators (atmosphere-supplying or air-purifying)

Fitting Guidelines:

Qualitative Test Procedure:

- A qualitative fit test can be performed with a variety of test agents including isoamyl acetate, saccharin solution aerosol, bitter aerosol (denatonium benzoate), and irritant smoke (stannic chloride). The choice of the test agent will depend on the type of mask selected.
- A qualitative fit test shall be done in the following matter:
 - The worker puts on the selected respirator according to the manufacturer's instructions.
 - He/she is asked to perform a seal check.
 - When using a half-face respirators and irritant smoke as a test agent, workers should be reminded to keep their eyes closed during the test, since smoke can irritate the eyes.

- A threshold check is performed.
- The worker is exposed to an atmosphere containing an odorant, irritant or taste agent.
- The worker is then asked to perform the following exercises for at least 30 seconds:
 - Breathe normally
 - Breathe deeply
 - Turn their head from side to side; inhale and exhale when the head is at either side
 - Nod head up and down; inhale when the head is in fully up position, and exhale when the head is in fully down position
 - Talk aloud and slowly
 - Bending over
- The worker then reports any noticed odor or taste changes. If the test agent is detected, the test is immediately terminated due to improper fit. A different respirator is then selected, adjusted and the entire test procedure is then repeated until a respirator is deemed to fit that individual.
- If the worker does not detect the test solution during the entire test, then the respirator fits properly. The type, size and style of respirator, including the cartridges needed are then documented and kept on file.

Seal Check Cartridge Respirators

- Before fit testing and whenever the respirator is put on, a seal check shall be performed.
 Workers should perform a negative (inhalation check) and a positive (exhalation) pressure seal check; or a check recommended by the respirator manufacturer.
- To conduct a negative pressure seal check: cover the cartridges with your hands, inhale
 gently to collapse the face-piece slightly, and hold your breath for 10 seconds. If the facepiece remains slightly collapsed and no leakage is detected, the respirator fits properly.
- To conduct a positive pressure seal check: cover the exhalation valve with your hand and exhale gently into the face-piece. If a slight positive pressure is built up inside the face-piece without any evidence of leakage, the fit is suitable.

Use Guidelines:

- Hazard Assessment
 - A hazard assessment shall be performed by a qualified person to determine the respiratory hazards present and to assist in the selection of an appropriate respirator where required.
 - The nature of the hazard shall be determined with guidance from the following criteria:
 - Identification of contaminants present in the workplace
 - Identification of the physical states of airborne contaminants
 - Measurement (or estimation) of the concentration of the contaminants
 - Determined if the atmosphere is oxygen-deficient
 - Identification of the established occupational exposure limit for each airborne contaminant
 - Determine if an Immediately dangerous to life or health (IDLH) atmosphere is present
 - Determine if there is a specific health regulation or substance-specific standard for the contaminant
 - Determine (for particulate hazards) if there is oil present in the workplace
 - Determine if the contaminant can be absorbed through, or is irritating to, the skin or eyes

- Training of Respirators
 - Training shall be provided by a qualified person with a practical understanding of the respiratory protection program roles, responsibilities, and requirements.
 - Records of training shall be kept on file and maintained.

Care Guidelines:

- Respirators should be properly maintained to preserve their original effectiveness. Care shall include:
 - Cleaning and sanitizing
 - Inspection, testing and repair
 - Storage
 - Record Keeping
- Cleaning and Sanitizing Requirements
 - Respirators must be cleaned after every use according to the respirator manufacturer's instructions or according to the following alternative procedure:
 - Remove filters, cartridges canisters or any other components recommended by the manufacturer (anything not to be washed).
 - Wash the respirator in warm water with a mild cleanser that contains a disinfecting agent.
 - Rinse the respirator very thoroughly in warm running water.
 - Allow respirator to air dry; alternatively, hand-dry with a clean, lint-free cloth.
 - Reassemble the face-piece, replacing filters, cartridges, and canisters where necessary.
 - Test the respirator to ensure that all components work properly.
 - Properly store the respirator. Storing a respirator in a sealed bag is recommended.
 - Note: If the respirator is not individually assigned, then cleaning and sanitizing must be performed before the next use of the device.
- Inspection Requirements
 - Workers shall inspect their respirators before and after each use in accordance with the manufacturer's instructions. Inspection of the respirator includes the following points:
 - Condition of component parts
 - Tightness of connections
 - End-of-service-life indicators
 - Shelf-life dates
 - Proper functioning of regulators, alarms, and other warning systems / devices
- Repair and Test Requirements
 - Defective or non-functioning respirators must be identified and tagged as "out of service" or equivalent and removed from service until repaired or replaced. Only qualified persons shall repair and test respirators and cylinders, using original manufacturer's replacement parts and repair procedures.
- Storage Requirements
 - Respirators must be stored in a manner to protect them against dust, ozone, sunlight, heat, extreme cold, excessive moisture, or any other potential hazard that may have a detrimental effect on the respirator. Respirators shall be stored in accordance with the respirator manufacturer's instructions to prevent the deformation of rubber or other parts.

Record Retention

- Appropriate records of activities conducted within the confines of this program must be kept by the applicable workplace parties. Documentation required to be maintained includes:
 - Hazard assessments
 - Selection of the appropriate respirator
 - Fit test records
 - Training records for the respirator user
 - Maintenance records of respirators
- N95 Respirator Practices
 - Use for solid particulates and liquid mists in concentrations not exceeding 10X PEL/OEL.
 - Always follow User Instructions and use in manners as indicated.
 - Do not use for gases and vapors, oil, aerosols, asbestos, arsenic, cadmium, lead, 4,4-methylene dianiline (MDA), or abrasive blasting.
 - o Do not use in any manner not indicated in the User Instructions.
 - o Replace the respirator when it becomes dirty, damaged, or difficult to breathe through.
 - o It is recommended to store respirators away from contaminated areas, dust, sunlight, extreme, temperatures, excessive moisture, and damaging chemicals.

8- Fall Protection:

References:

- Construction Projects Regulation 213/91: Section 26
- CSA Z259.12-11 Fall Protection Standard

Selection Guidelines:

- Workers who may be exposed to a fall hazard must be protected by the highest- ranked method of fall protection that is practicable (O. Reg. 213/91, s. 26.1(2)). The higher the method is ranked, the less chance there is for a worker to be injured. These methods are ranked in order below:
 - Hazard Elimination changing the work process so the hazard no longer exists
 - Guardrails, Protective Covers, and Warning Barriers protect a fall from unprotected edges or openings
 - o Travel Restraint System allows a worker to reach the edge but not fall over it
 - Fall Restricting System designed to limit a fall distance to 0.6 m (2 ft)
 - Fall Arrest System designed to stop a falling worker before they hit the ground or objects below
 - Safety Net designed to catch a falling worker before they hit the ground or objects below
- Fall Protection Components
 - CSA-approved Full-Body Harness
 - The chest strap should be snug and near the middle of the chest. Leg straps should allow a fist to fit snugly between the strap and leg. The D-ring should be in the centre of the back between the shoulder blades.

CSA-approved Lifeline

A typical lifeline is 16-mm (5/8-in) synthetic rope (polypropylene blend). All lifelines must meet the CSA standard Z259.2.5-12 for fall arresters and vertical lifelines.

CSA-approved Lanyard with Energy Absorber

Lanyard should be secured to an attachment point higher than waist level and kept as short as possible to reduce fall distance. Remember: the energy absorber can increase lanyard length by as much as 1.1 m (42 in).

CSA-approved Connecting Devices

• Must be capable of supporting at least 22 kN (5,000 lb). Snap hooks and carabiners must be self-locking to prevent accidental roll-out. Rope grabs must be attached to the lifeline in the correct direction. Note: Rope grabs are designed for use with a specific diameter of lifeline and length of lanyard.

Anchorage or Fixed Supports

Must be capable of supporting all loads that may be placed on it (16 kN (3,600 lb) at minimum)

• Types of Anchors

Permanent anchors (Designed fixed supports)

 Load-rated anchors that are permanently installed for fall protection as an integral part of a structure (e.g., roof anchors).

Temporary fixed supports

 Designed to be connected to the structure using specific installation instructions (e.g., nail-on anchors).

Existing structural features

- Not intended as an anchor but verified by a professional engineer or competent person to serve as one (e.g., reinforced concrete columns)
- NEVER anchor to roof vents or hatches, small pipes and ducts, metal chimneys, TV antennas, stair or balcony railings, or fixed access ladders.

Types of Lifelines

Vertical lifelines

 Can be used by only one person at a time and must have a positive stop to prevent the rope grab from running off the end.

Horizontal lifelines

• Must be designed by a professional engineer and clearly indicate the anchor points, the design loads, and the number of workers that can be safely attached.

Self-retracting lifelines (SRLs)

- Allows the line to unspool and retract based on the worker's movements, thereby limiting the fall distance. Most are designed to be anchored overhead.
- **CAUTION:** Knots along the length of either a horizontal or vertical lifeline can reduce its strength by as much as 40 per cent.

Fitting Guidelines:

- Full-body harnesses are fully adjustable and available in different sizes. Proper fit of the harness is important, especially when it is being used for fall arrest. Always refer to manufacturer's instructions for proper use and fit of a full-body harness
 - Adjust the chest strap so that it is snug and located near the middle of your chest. A general rule is above the sternum, just below the armpits. If you fall, a properly adjusted chest strap will prevent you from coming out of the harness.
 - o Adjust the leg straps so that your fist can fit snugly between the strap and your leg.
 - Adjust the shoulder straps so that the back D-ring rests between your shoulder blades.
 A properly positioned D-ring will keep you upright after a fall.

Use Guidelines:

 Personal fall protection systems must be inspected before each use and defective components must be removed from service.

- Check the harness to make sure that:
 - the hardware and straps are intact and undamaged
 - o moving parts are moving freely
 - the webbing is free of burns, cuts, loose or broken stitching, frayed material, and signs
 of heat or chemical damage
 - the fall arrest indicator has not deployed
- Check the lanyard for:
 - fraying, kinking, and loose or broken stitching
 - o rust, cracks, and damage to the lanyard hardware
 - stress or tearing on the cover jacket of the energy absorber
- Check the lifeline for:
 - o tears, cuts, or burns
 - o strands that are different sizes or shapes
 - discoloration and brittleness
 - broken or loose strands inside the rope
 - o buildup of powder or dirt inside the rope
 - loose thimbles
- Check connecting components for:
 - o damage, cracking, dents, bends, or signs of deformation
 - o sharp edges
 - o moving parts that don't work smoothly
 - rust and signs of wear or metal fatigue
- Access Structures
 - Most ladders are not work platforms. They are a means of access. When over 3 metres, you must follow the fall protection requirements, which includes training.
 - Other means to consider instead of using a ladder include:
 - Scaffold work platforms more than 2.4 m (8 ft) high must be fully planked, have guardrails, and have a safe means of access and egress (ladder or stairway).
 - Elevating work platforms (EWP) must have guardrails. Operators must be trained on the specific class of EWP they will use. If the EWP will be moved, any worker on the platform must be tied off.
 - Suspended access equipment (SAE) users must be tied off while working on it or getting on or off it and they must have received WAH and SAE Users training. Only a designated competent worker with SAE Installers train in can install, alter, or dismantle SAE. Only a competent worker or qualified person (see CAN/CSA Z271-10) can inspect, test, or maintain SAE.
- Emergency Rescue Plan
 - A worker whose fall has been arrested must be brought to safety as quickly as possible without causing further injury or putting rescuers at risk. Before using a fall arrest system, written fall rescue procedures will be developed and communicated to the worker.
- Fall Clearance Distance
 - A fall protection system must prevent a falling worker from hitting the ground or an object below. This requires knowing the Fall Clearance Distance, which is the distance from the ground (or object below) to the connection point where the worker attaches their lanyard to the anchor or lifeline.
 - The calculation for Fall Clearance Distance is:
 - Length of Lanyard + Length of Deployed Energy Absorber + Height of Worker
 + Safety Factor = Fall Clearance Distance.

Fall Arrest Planning

- Before using a fall arrest system, the hazards a worker may be exposed to in case of a fall will be assessed:
 - Will the worker "bottom out" (i.e., hit the ground or any material, equipment, or a lower level of the structure before the fall is arrested)?
 - Will the pendulum effect or "swing fall" cause the worker to swing from side to side, possibly striking some equipment, material, or the structure?
 - How will the suspended worker be rescued?
- To prevent the risk of bottoming out: the Total Fall Distance will be calculated to make sure it is less than the distance from the work surface to the surface below.
- To minimize pendulum effect: the lanyard or lifeline perpendicular will be kept (at a 90° angle behind the worker) from the edge to the anchor point. Or run a horizontal lifeline parallel to the edge. The worker can attach a lanyard to it and move along the edge, staying close to perpendicular at all times.
- o **CAUTION:** The friction exerted by a swing fall may cause the lanyard or lifeline to break where it runs over a sharp edge. Use edge softeners to minimize this risk.

Mandatory Training

- Before use, workers must be trained to understand:
 - The application limits (for example maximum permitted free falls, distance needed below to stop before hitting lower levels or objects, minimizing swing falls, etc.) of the equipment.
 - Proper hook-up, anchoring, and tie-off techniques.
 - Proper use, inspection, and storage of equipment.
 - Training must be provided by CPO-approved Working at Heights training provider.
- A refresher training must be completed every 3 years.

Inspection of Equipment

- Fall protection equipment needs to be inspected prior to using and after each use. Harnesses should be inspected for marking on load bearing webbing, cuts, burns, discolouration, excess dirt or wear, knots, other damage and activation of the impact indicator where applicable.
- All labels must be present. Hardware such as D-rings, snap hooks and buckles should be free of cracks, corrosion, deformation, burrs, missing parts, or other damage and/or wear.
- If there is ever any sign of an unsafe condition or if the harness shows signs that it has been used to arrest a fall it should be immediately withdrawn from service and destroyed.

Care Guidelines:

- Basic care increases the life of the unit and contributes to its performance. Follow the manufacturer's instructions on how to care and clean the equipment. Steps may include:
 - Wipe off all surface dirt with a sponge dampened in plain water. Rinse the sponge and squeeze it dry. Dip the sponge in a mild solution of water and commercial soap or detergent. Work up a thick lather with a vigorous back and forth motion.
 - o Rinse the webbing in clean water.
 - Wipe dry with a clean cloth. Hang freely to dry.
 - Dry the equipment away from direct heat, and out of long periods of sunlight.
 - Store in a clean, dry area, free of fumes, sunlight, corrosive materials, sharp edges, or vibration and in such a way that it does not warp or distort the equipment.



GAZZOLA PAVING LIMITED Preventive Maintenance Policy Statement

Gazzola Paving Limited commits to implement preventive maintenance programs to ensure all machines and equipment are serviced according to the manufacturer's specifications and meeting all the legislated requirements.

The preventive maintenance program at Gazzola Paving Limited will consist of the following parameters:

- 1- **Machinery and Equipment Inventory:** A comprehensive list of all machinery and equipment owned or leased by Gazzola Paving Limited that carries all the required information
- 2- **Preventive Maintenance Schedules:** Maintenance schedules for different parts of the machines/equipment, at least annually or more frequently as required by the legislative and/or the manufacturer's requirements
- 3- **Preventive Maintenance Activities:** All maintenance activities performed must be recorded including the type of the machine/equipment, the date it was performed and the type of maintenance or the corrective action performed

Gazzola Paving Limited will ensure that only appropriately qualified personnel are designated to perform preventive maintenance activities.

Gazzola Paving Limited will ensure that overdue for maintenance and/or defective tools, machines, equipment and vehicles will be tagged and removed out from service until they are ready for service after maintenance or repairs.

Virgil Gazzola, Vice-President

March 18, 2025

Date

PURPOSE

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

SCOPE

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

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- 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:

- 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 are provided, maintained in good condition and used as prescribed.

Project Manager Responsibilities:

- Arrange for specific PM to be scheduled and followed up.
- Ensure appropriate PM requirements are completed for all equipment or machinery as required.
- Develop the PM Program for all workplaces and sites level equipment and vehicles.
- 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 appropriate PM requirements are completed for all equipment or machinery 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.

Foreman Responsibilities:

- Complete or schedule all equipment or machinery PM as required with the Superintendent and/or Project Manager.
- Ensure known site related hazards are defined and appropriate PM requirements are completed for all equipment or machinery as required.
- 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:

- Report any damage or malfunctioning equipment or machinery immediately to your supervisor.
- 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.

PROCEDURE

Preventive maintenance is predetermined work performed to a schedule with the aim of preventing wear and tear or sudden failure of equipment components.

A good preventative maintenance program reduces downtime. Long-term benefits of a reliable and well-documented preventative maintenance program include:

- Improve system reliability
- Decrease cost of replacement
- Fewer production stoppages
- Fewer large scale repairs
- Increased life expectancy for equipment
- Less need for standby equipment
- Identification of equipment with high maintenance costs (leads to checking and correction or outdated equipment)
- Better spare parts control
- Greater work safety reduce injury
- Lower manufacturing costs

The successful maintenance program is:

- Well organized and scheduled
- Controls hazards
- Defines operational procedures
- Trains key personnel

The Preventive Maintenance Program will address the following:

- 1. Machinery and Equipment Inventory
- 2. Preventive Maintenance Schedule
- 3. Preventive Maintenance Activities

The First Step in Preventive Maintenance is to develop a comprehensive listing of all equipment and machinery where capital investment costs on tools or equipment will be the criteria to be included under this list.

Capital investment costs will be defined as product costing more than 3500 dollars.

Once an inventory of equipment and machinery has been conducted the **Project Manager** will audit the equipment and machinery and develop time schedules for maintenance. Use the equipment's manuals and previous experience/history to outline all maintenance and repair activities and do this for each equipment.

Once complete, the **Project Manager** will ensure that the schedule is met, documented and conducted by competent service providers.

DISTRIBUTION

The Preventative Maintenance Program shall be reviewed by **Senior Management**, **Project Manager** and the **Health and Safety Coordinator** on an annual basis or more frequently as required to ensure that the program is in compliance with applicable legislation/ standards and that it is achieving the desired result of a safe and healthy workplace.

RECORDS

The maintenance program shall be recorded on the 4S electronic platform. Part of this system should be made up of inventories and schedules. In Addition, the recording system should document what maintenance work was done, when, and by whom. Need to keep records of all maintenance activities, indicating the machine(s) involved, type of maintenance and date on which performed.

Ensure that all maintenance activities are well documented. Keep records of staff training, regular repairs, purchases, pre-operation inspection findings, etc. Documents should show that the preventative maintenance program supports all other prerequisite programs.

Project Manager will maintain all records on file for the life of the machinery or equipment.

MACHINERY AND EQUIPMENT INVENTORY

PROCEDURE

An inventory of equipment and machinery will be used by the Health and Safety Coordinator in consultation with the Project Manager of maintenance to implement and maintain the Preventive Maintenance Program. An inventory of machinery and equipment used and developed by the Project Manager and in consultation with the Health and Safety Coordinator where **capital investment costs on tools or equipment will be the criteria to be included under this list.** The inventory of items will be recorded on the 4S electronic platform. This items to be reviewed when developing the inventory include:

- **Mobile equipment** (e.g., trucks, dump trucks, trailers, and other material handling equipment)
- **Heavy Equipment** (e.g., pavers, loaders, rollers, excavators, skid steers)

A Machinery and Equipment Inventory will be developed and used to document the inventory.

Required Information

The Machinery and Equipment Inventory will be completed by the Project Manager and the Health and Safety Coordinator to provide the following information for all machinery and equipment used in each specific work area of the shop:

- The name of the machinery or equipment
- The serial number
- The required maintenance activities per manufacturer's instructions
- The required frequency of the maintenance activities per manufacturer's instructions
- The date of last service

Completion of Machinery and Equipment Inventory

The following steps should be taken when completing the Machinery and Equipment Inventory:

- When recording the name of the machinery or equipment, both the common name used by employees for the machinery or equipment as well as the formal name (provided by the manufacturer) should be recorded. If a model number is identified on the machinery or equipment, also include the model number.
- 2. The asset or serial number for the specific piece of equipment must be recorded to distinguish between specific pieces of equipment with the same common or formal names.
- 3. The required preventive maintenance activities and frequency will be determined through a review of:
 - a. The manufacturer's recommendation contained in any Operating Manuals available for the specific machinery or equipment
 - b. Applicable legislative requirements or industry standards
 - c. Current maintenance activities being performed
 - d. Discussions with Managers or technicians and maintenance personnel

4. The completed Machinery and Equipment Inventory will be reviewed with the Health and Safety Coordinator, Project Manager and workers for the work area to ensure accuracy and completeness.

The completed Machinery and Equipment Inventory will be maintained on the 4S electronic platform and the Health & Safety Coordinator/Project Manager will ensure the inventory is kept current.

PREVENTIVE MAINTENANCE SCHEDULE

PROCEDURE

A preventive maintenance schedule will be developed in conjunction with the preventive maintenance inventory and implemented to ensure that preventive maintenance activities are planned, scheduled and performed by appropriately qualified personnel at the required intervals.

Preventive maintenance schedules will be developed for each work required piece of equipment by the Project Manager and Health and Safety Coordinator.

Each schedule will address all items included on the Machinery and Equipment Inventory and will assign specific dates and assign responsibility for the performance of the preventive maintenance activities from the manufacturer's recommendations and legislative requirements.

Items to be considered when developing the schedule include:

- The specific parts of machinery or equipment to be reviewed and the required frequency of review (as indicated on the Machinery and Equipment Inventory)
- The effect preventive maintenance activities will have on production schedules (as these
 activities should be scheduled to minimize their effect on production scheduling)
- The required qualifications of the person(s) assigned responsibility for performing the preventive maintenance activities (i.e., the activity to be performed by maintenance personnel, machinery or equipment operators or by an external specialty contractor)

Only appropriately qualified personnel will be designated to perform preventive maintenance activities.

The Preventive Maintenance Schedule will be used to document the process conducted by the qualified personnel will be designated to perform preventive maintenance activities.

The completed Preventive Maintenance Schedule will be maintained on the 4S electronic platform by the Project Manager.

PREVENTIVE MAINTENANCE ACTIVITIES

PROCEDURE

Preventive Maintenance Activities will be performed by appropriately qualified personnel for each piece of equipment based on the Preventive Maintenance Schedule.

The following minimum inspection will be undertaken relating to Preventative Maintenance:

- Competent operators, adequately trained on the use of their specific piece of equipment will be required to complete daily Vehicle Circle Checks and/or daily Equipment Pre-Operational Checks for defects and repairs
- Service interval for small trucks is required every 10,000 kms, for large trucks every 30,000 Kms and for equipment every 400 hours
- Annual MTO Periodic Mandatory Commercial Vehicle Inspection (PMVCI) will be undertaken and trucks will have a valid sticker for CVOR vehicles

All defects, bent, worn or damage parts are to be repaired as soon as possible after detection to ensure that vehicle or equipment is ready and available.

Preventative maintenance activities and inspections shall be undertaken by Technicians employed by Gazzola whom hold one of the following Ontario College of Trades certifications:

- Truck and Coach Technician 310T certification
- Truck Trailer Service Technician 310J certification
- Heavy Duty Equipment Technician 421T certification

Any Technician in an approved apprenticeship program will be overseen by a certified Technician journey person.

Documentation

Preventive Maintenance records will be used to document all preventive maintenance activities. This package should also be used to document damaged or worn parts observed during routine preventive maintenance activities. The records are maintained on the 4S electronic platform.

Preventive Maintenance Procedures

Preventative Maintenance schedules will be developed for all equipment as required. Documenation of these maintenance activites must be maintained upon completion of the Preventive Maintenance.

Preventative Maintenance (Lockout/ Tagout Procedures)

- 1. Certified mechanics are to conduct work that required lockout and tagout
- 2. Place disconnected device in the OFF position and test for potential energization
 - a. If it a mobile piece of equipment, use the chocks to ensure no inadvertent movement
 - b. If applicable, shut off air supply, release residual air pressure, remove the hose

- c. Lockout gas, steam, or other valves at the point of operation and open others to bleed of residual pressure
- d. Drain or bleed off hydraulic lines
- e. Block or otherwise immobilize gravity devices and mechanisms under tension or pressure such as rams, springs or fly wheels
- 3. Install appropriate locking devices
- 4. Verify Zero-Energy test operation switches to verify that the equipment cannot be restarted, if lockout has not occurred, do not proceed
- 5. Remove all lockout and tagout devices (locks, tags, blocks, chains, etc.) once work completed, and the equipment is inspected/safe
- 6. Lockout and tagout devices are only to be removed by the worker who installed them
- 7. Re-energize equipment as applicable and have the operator test run the equipment to ensure that everything is working properly

The completed Preventive Maintenance Records will be maintained on the 4S electronic platform.

Preventative Maintenance (Defective Machinery and Equipment)

In the event that a machinery, vehicle or piece of equipment is found to be damaged or defective, the supervisor will:

- Notify the maintenance department of the machinery/equipment/vehicle immediately for repair
- arrange for replacement.

Regardless of the situation, the below procedures should be followed:

- 1. Worker/Operator to report deficiencies/damage to supervisor
- 2. Worker/Operator and supervisor to inspect the broken machinery/piece of equipment to decide what type of action is required. (e.g. Repair on site, remove from use, etc.)
- 3. Turn off/deactivate machinery/equipment/vehicle (complete "lock-out" as required) and complete entry into log book (as required).
- 4. Supervisor to ensure machinery/ equipment is placed in safe, secure location and is unavailable to workers/operators.
- 5. If dealing with damaged/defective equipment, supervisor must make arrangements to get the machinery/equipment in good working order. Only competent and trained persons are authorized to repair defective tools and equipment and, upon repair, authorize them as approved for use.
- 6. If equipment is rented, Supervisor or Management to contact the rental company to return the machinery/equipment.
- 7. The lock out tag (if attached) shall stay affixed to the machinery or equipment until all required inspections, maintenance and service activities are completed.
- 8. Once the machinery, equipment or vehicle has received the necessary inspection, maintenance and/or service, and approved for use, the approving maintenance person shall notify the Supervisor to identify it as ready for use.

Preventative Maintenance (Overdue for Service Machinery and Equipment)

In the event that a machinery, vehicle or piece of equipment is found to be overdue for service, the following procedure will be followed:

- The project manager will identify the machine, equipment or vehicle that is overdue for service or approaching their service date on the 4S electronic platform and will notify the maintenance department.
- The maintenance department will identify the project/site where the machine, equipment or vehicle is currently working and will notify the site supervisor.
- The site supervisor will arrange for the machine, equipment or vehicle to be sent back to the maintenance department for service as soon as practical and arrange for a replacement as required.
- Once the machinery, equipment or vehicle has received the necessary service, the approving maintenance person shall notify the project manager and provide the service records.
- The project manager shall update the last service date on the 4S electronic platform to ensure the machine, equipment or vehicle is available and ready for use.



GAZZOLA PAVING LIMITED Training Policy Statement

Gazzola Paving Limited believes that training and education will enhance our staff's knowledge and in turn provide them with the knowledge and skills required to implement sound accident prevention strategies.

To that purpose, Gazzola Paving Limited will ensure that all employees have acquired the proper training and education upon hiring and before performing any task. The training needs will be assessed according to the company training needs and the legislative requirements and will be provided by competent trainers only.

Gazzola Paving Limited is also committed to train all employees on the company's Occupational Health and Safety Management System including information on the purpose, roles, responsibilities and rights, importance of conformity, potential consequences for deviations and non-compliance and importance of participation within the System.

Gazzola Paving Limited will ensure that all workers receive a proper Orientation using the Company Specific Annual Orientation package. The Orientation will provide every company employee with the specific health and safety expectations prior to commencing their employment obligations. Orientations are mandatory for all workers and is completed for new, returning and workers changing positions.

Annual Orientation will be provided to the employees hired, in addition to receiving the yearly updated version during the Annual Refresher Orientations.

Gazzola Paving Limited will maintain records of training certificates and completed Orientations of all employees, while also entering the appropriate data digitally into a Training Matrix.

Virgi Gazzola, Vice Pesident

March 18, 2025

Date



GAZZOLA PAVING LIMITED Communication Policy Statement

Gazzola Paving Limited believes that on-going communication and keeping open channels plays an essential role in maintaining a healthy and a safe workplace.

Gazzola Paving Limited is committed to remove information barriers by communicating the latest and all updated health and safety information with all parties. This approach will help our employees take the right decision when it comes to health and safety issues or concerns.

Gazzola Paving Limited will adopt numerous ways of communicating information internally, which includes but are not limited to:

- 1. JHSC Meetings
- 2. Management Meetings
- 3. Workplace Orientations
- 4. Annual Refresher Orientations
- Tailgate Safety Talks

Gazzola Paving Limited will hold at least one Company wide meeting known as the Annual Refresher Orientation for all employees that will include the Occupational Health and Safety Management System and its implementation. The Orientation Package will include Safe Work Practices (SWP), workplace health and safety responsibilities, Workplace Task Standards (WTS), requirements, obligations and rights and significant changes to the Health & Safety systems

Gazzola Paving Limited commits to perform all types of communication in a manner that will be understood by the receiver of the message and in an environment that allows the opportunity for input and feedback from all participants.

Gazzola Paving Limited will receive, document, respond and maintain records of internal and external Health and Safety Communications as required.

Virgir Gazzola, Vice-Product

March 18, 2025

Date

PURPOSE

Ongoing training and education will be used to ensure that all management staff and workers receive the appropriate training to supervise and/or perform their jobs safely.

Moreover, when hiring employees to conduct work on behalf of the company, it is important that the employee has been made aware of the company specific safety requirements and the other site-specific policies.

SCOPE

Training and education will enhance our staff's knowledge and in turn provide them with the knowledge and skills required to implement sound accident prevention strategies.

In addition to that, Worker Orientation using the company specific orientation package will provide every company employee with the specific health and safety expectations prior to commencing their employment obligations. Worker Orientation's to include review of the Workplace Task Standards (WTS).

RESPONSIBILITIES

Health and Safety Coordinator (In-house Trainer) Responsibilities:

- Identify Health & Safety Competencies needed to perform different tasks
- Schedule all required training with applicable workers, Foreman and Managers.
- Maintain records and record completion dates of training on a training matrix.
- Assist in developing corporate health and safety training documentation, policies and procedures where required.
- Assist in conducting orientations and collecting documents and ensure both parties sign the documents.
- Assist in coordinate the communication and confirmation of the orientation material during orientation meetings as needed.
- Schedule any required re-orientation based on revision or addition of required content.
- Maintain all documentation related to the orientation progress including the Orientation Checklist
- Gather existing training and certification documents from employees completing the orientation process.
- 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 are provided, maintained in good condition and used as prescribed.
- The measures and procedures prescribed are carried out in the workplace.

Project Manager Responsibilities:

- Assist in scheduling all required training with applicable workers, and Foreman.
- 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 scheduling all required training with applicable workers, and Foreman.
- Conduct site orientations and collecting documents and ensure both parties sign the documents.
- Coordinate the communication and confirmation of the orientation material during orientation meetings as needed.
- Complete all documentation related to the orientation progress including the Orientation Checklist and Sign Offs.
- Assist the Health and Safety Coordinator to 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 the 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:

- Assist in scheduling all required training with all applicable workers.
- Ensure site level training records are maintained and up to date.
- Ensure that all workers who are under their supervision have successfully received an orientation.
- 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 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 either in person or by on-line training platforms.
- Complete orientation review, training documentation and other relevant documentation identified by Gazzola.
- Advise Foreman of required or expired training requirements.
- 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.

TRAINING PROCEDURE

Management of Training

The **Health and Safety Coordinator** will review documentation of recent training received by all members of the team and recorded on the electronic / web-based Training Matrix. Completed training will be tracked using the Training Matrix. Additional training to be arrange as necessary.

Training identified to be required will be provided only by:

- In-house competent trainers that are holder of at least on of the following
 - Train the Trainer Certification (TOT),
 - Adult Learning Techniques Certification.
 - o Or, similar certification and the necessary H&S qualifications, skills and experience appropriate to the training programs provided.
- Approved 3rd party training providers or,
- Use of web-based Health & Safety Training Programs such as the 4S Consulting platform currently being used by Gazzola .

All trainings must include means of evaluation of training such as written evaluations. Quizzes will also be utilized for online training to ensure the delivery of training information.

Certain training requirements must be provided before starting work or performing tasks including Legislated Mandatory Training and any other training deemed to be necessary before performing a task.

Accordingly, the **Health and Safety Coordinator** will arrange appropriate training courses in a reasonable time to meet the legislative minimums and our minimum training requirements. At minimum, a corporate training review will be undertaken on an annual basis.

Health & Safety training needs will be determined and reviewed annually as part of the review of this training procedure, including:

- A training needs analysis that identifies the main competencies required for different roles.
- Reviewing all applicable legislative or other training requirements as identified on Section 13 (Legislation & Other Requirements) of this H&S Program to ensure training requirements are being met and remain in compliance.

- Taking different levels of responsibilities into training considerations (workers/supervisors) in addition to language skills, abilities and literacy considerations. Training presentations may utilize different training delivery techniques including visual aids and practical examples.
- Including company specific information on Gazzola's Health & Safety Management System
 including purpose, roles, responsibilities and rights, importance of conformity, potential
 consequences for deviations or noncompliance and importance of workers' participation
 within the HS Management System in the form of the Company Policies and Orientation
 Training.

Training Needs Analysis

All training that is identified as a training for all workers and/or supervisors (NOT AN AS REQUIRED TRAINING) will be considered the basic minimum competencies required based on the role. Basic minimum competency training must be completed before starting work including all the legislative training requirements.

Role (Level of	Competencies/Training Requried
Responsibility)	Competences, Framming Required
Worker	 Health & Safety Awareness in 4 Steps (Workers)* Workplace Violence & Harassment (Workers)* WHMIS * AODA * Company Policies Orientation Training Applicable Workplace Task Standards WTS (Online training package assigned on the 4S electronic platform in accordance with tasks performed by workers) Personal Protective Equipment (PPE) Fire Extinguisher Awareness Machine/Equipment Operator** Asbestos Awareness** Working at height** Confined Space** First Aid** Propane** Traffic Control** Any other training that may deemed to be necessary to comply with a client requirement or to perform a specific task**
Supervisor /Manager	 Health & Safety Awareness in 5 Steps (Supervisors)* Workplace Violence & Harassment (Supervisors)* WHMIS* AODA* Company Policies Orientation Training

- Applicable Workplace Task Standards WTS (Online training package assigned on the 4S electronic platform in accordance with tasks performed or organized by supervisors)
- Basics of Supervision
- Accident Investigation
- Personal Protective Equipment (PPE)
- Fire Extinguisher Awareness
- Asbestos Abatement (Supervisor)**
- Working at height**
- Confined Space**
- First Aid**
- Propane**
- Any other training that may deemed to be necessary to comply with a client requirement or to perform a specific task**
- * Mandatory Legislated Training Requirements.
- ** As Requried. This training is not a requirement for all workers and/or all supervisors

ORIENTATION PROCEDURE

All returning employees and new hired workers will be assigned on-line Orientation package which must be completed prior to the start of work. The Superintendent and/or the Health and Safety Coordinator to verify completion of all assigned training including at a minimum, the following steps;

- Complete Orientation, WHMIS 2015, Worker Health & Safety Awareness in 4-steps, Workplace Violence & Harrasment for Employees, Fire Extinguisher Refresher and Accessibility for Ontarians with Disabilities (AODA) with testing.
- Complete review of all company policies.
- Review all applicable Workplace Task Standards.
- Review any and all training certificates that the employee has and arrange any subsequent company required training accordingly.

Orientation Training is mandatory for all workers including new workers, returning workers and workers changing positions or sites. All completed training will be kept on-line using 4S Consulting program.

Annually, the Health and Safety Coordinator will hold a startup orientation where all employee will be required to complete the above noted items.

Young Workers

Definition

"Young Worker"

Any worker under the age of 25 or less than 3 years of industry experience.

Note: No person under the age of 16 is allowed to work on a project or to be on a project.

- Young and new workers will be assessed on the project to ensure that their work habits and their comprehension of the Employee Guidelines are adequate to protect their safety.
- Young and new workers will be supervised under the direction of an appropriately experienced worker through the shadowing process.
- The Foreman will determine at what point the young or new worker no longer requires direct supervision based the young or new worker's work habits and comprehension of the safety system.

DISTRIBUTION

The **Health and Safety Coordinator** shall maintain copies of the documentation pertaining to the training requirements on-line using the 4S Consulting program.

Those employees returning or new hires will be required to complete all on-line training and will be tracked using the on-line program stipulating that they have received, read and understood the company orientation package and expectations.

Subsequent, where a new process or guideline is developed, **Health and Safety Coordinator** will revise the orientation package and schedule the revised guidelines to be delivered to all workplace parties.

RECORDS

Training documentation must be maintained by photocopying or uploading training certificates and data into electronic version of the Training Matrix.

Section 8-2 - Communications

PURPOSE

Ensuring ongoing communication of our Safe Work Practices (SWP), workplace health and safety responsibilities, Workplace Task Standards (WTS), requirements, obligations and rights and significant changes to the Health & Safety systems

Our initial and refresher Orientations are essential tools for this ongoing communication.

SCOPE

The Orientations will provide every company employee with the specific workplace standards and health and safety expectations prior to commencing their employment obligations in addition to acting as an annual refresher on the same subjects/topics.

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Develop the corporate health and safety annual orientation package.
- Maintain all documentation related to the JHSC and Management meetings, preparing and recording minutes.
- Distribute and communicate information to the appropriate parties regarding any nonconformance or deficiencies reported.
- Coordinate the communication and confirmation of the annual orientation package
- Maintain all documentation related to the orientation package.
- Maintain all documentation related to the company-wide annual meetings.
- Distribute Tailgate Safety Talk topics as required.
- Receive completed copies of Tailgate Safety Talks form each Superintendent or Foreman.
- Receive, document and respond to all Internal (Tailgate talks, JHSC meetings, Management meetings, Orientations...etc.) and external (MOL, WSIB, IHSA...etc.) Health and Safety communications
- 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 annual orientation package, policies and procedures.
- Ensure a company-wide meeting is held at least annually.
- Attend and participate in company-wide annual meetings.
- 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.

Section 8-2 - Communications

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:

- Assist in the coordination of availability and timelines of JHSC members for safety meetings.
- Participate and provide input when requested to all distributed documentation from safety meetings.
- Conduct site orientations and collecting documents and ensure both parties sign the documents.
- Participate and provide input during the Annual Orientations & Company-wide meetings.
- Conduct or ensure that appropriate Tailgate Safety Talks are completed on a weekly basis.
- Ensure that copies (hard copy or electronic) of completed Tailgate Safety Talks are submitted 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.

Foreman Responsibilities:

- Ensure that all workers who are under their supervision have successfully received an orientation.
- Ensure Tailgate Safety Talk are delivered to all workers on their site as required.
- Record the topics and attendance on the Tailgate Safety Talk form to demonstrate compliance.
- Allow for follow up questions and clarification of topics as needed.
- Participate and provide input during the Annual Orientations & Company-wide meetings.
- 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:

- Participate in the health and safety workplace orientation either in person or by on-line training platforms.
- Participate and provide input during the Annual Orientations & Company-wide meetings.
- Complete annual orientation review, training documentation and other relevant documentation identified by Gazzola Paving Limited.
- Participate in Tailgate Safety Talk sessions and provide input to topics where required.
- Sign in on the Tailgate Safety Talk form to demonstrate participation and attendance.
- 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;

PROCEDURE

On-going communication and keeping open channels plays an essential role in maintaining a healthy and a safe workplace. Removing barriers by communicating the latest and all updated health and safety information with all parties will help our employees take the right decision when it comes to health and safety issues or concerns.

Gazzola adopts numerous ways of communicating information internally, which includes but are not limited to:

- 1. JHSC Meetings
- 2. Management Meetings
- 3. Workplace Orientations
- 4. Annual Refresher Orientations
- 5. Company-Wide Annual Meeting
- 6. Tailgate Safety Talks

JHSC Meetings:

JHSC meetings will be used to communicate the following Health and Safety information with all JHSC members:

- a. Programs
- b. Policies
- c. Procedures
- d. Systems
- e. Inspections
- f. Accidents & Incidents
- g. Changes to the systems, policies, programs and procedures
- h. Any other related Health and Safety Information

All documentation required for the meetings including Agendas, Memos and meeting minutes will be prepared and recorded by the Health and Safety Coordinator.

Management Meetings:

Management meetings will be used to communicate the following Health and Safety information with senior Management:

- a. Programs
- b. Policies
- c. Procedures
- d. Systems
- e. Statistics
- f. Inspections
- g. Accidents & Incidents
- h. Any other related Health and Safety Information

Management meetings also act as the forum to discuss and approve changes to Gazzola's Health & Safety Management System by Management.

All documentation required for the meetings including Agendas, Memos and meeting minutes will be prepared and recorded by the Health and Safety Coordinator.

Workplace Orientation

All returning employees and new hired workers will be assigned on-line Orientation process which must be completed prior to the start of work. The Superintendent and/or the Health and Safety Coordinator to verify completion of all assigned training including at a minimum, the following steps;

- Complete Orientation, WHMIS 2015, Worker Health & Safety Awareness in 4-steps, Workplace Violence & Harassment for Employees, Fire Extinguisher Refresher and Accessibility for Ontarians with Disabilities (AODA) with testing.
- Complete review of all company policies.
- Review all applicable Workplace Task Standards.
- Review any and all training certificates that the employee has and arrange any subsequent company required training accordingly.

Our orientation package will be developed and implemented by the **Health and Safety Coordinator** and approved by **Senior Management.** This package details Construction, Industrial and Office level workplace specific Hazard Assessment, Safe Work Practices (SWP) and Safe Job Procedures (SJP) and Workplace Task Standards (WTS). The Orientation Package will be held as a guidance document describing the minimum health and safety expectations needed to work within the workplace.

The Orientations will be reviewed by all workplace parties prior to their commencement of work. This training will be documented electronically on the 4S electronic platform to demonstrate all the information has been received, read and understood by the employee.

The Orientations will be reviewed annually during management meetings to ensure that they meet the requirements of the Health & Safety Program, workplace specific hazards and the appropriate legislative requirements.

Annual Refresher Orientations

The Orientation Package [This package details Construction, Industrial and Office level workplace specific Hazard Assessment, Safe Work Practices (SWP) and Safe Job Procedures (SJP) and Workplace Task Standards (WTS)] will be communicated at least annually in addition to refresher trainings on Health and Safety Awareness & WHMIS.

Company-Wide Annual Meeting

Senior Management will hold and attend at least one company-wide meeting annually with every employee. The company-wide annual meeting will be used to communicate information on the Health and Safety Management System, its implementation, statistics, objectives and significant changes. This will be achieved by reviewing the Annual Report (Annual Management Review) including the H&S Objectives and Action Plans for the new year cycle with all employees.

The company-wide annual meeting will take place in-person on multiple sessions (one session per crew/team) along the span of a week. Each meeting session must be attended and held by a Senior Management Representative and must include a Q&A to allow the opportunity for input and feedback from all employees. Q&As will be documented and maintained as part of the company-wide meeting documentation by the Health & Safety Coordinator.

Communication will be delivered in a manner that is understood by all receivers considering abilities, language skills and literacy, this may be achieved by the use of translated text or the help of bilingual workers as necessary and ensuring communication of H&S requirements is always clear, simple and straightforward.

Tailgate Safety Talks

The **Superintendent** or **Foreman** will conduct weekly Tailgate Safety Talks with our workers using the 4S electronic platform. The Topics will be chosen by the Superintendent, Foreman or **Health and Safety Coordinator** based on observations from the completed weekly workplace inspections unless a topic specific to a project is provided by the **Superintendent**.

Tailgate Safety Talk Forms must be completed by the **Superintendent** or **Foreman** or a competent designated person and all in attendance must sign in on the Tailgate Safety Talk. Tailgate Safety Talks can also be completed using Form 8-2-1 as a replacement of the 4S electronic platform.

The completed Tailgate Safety Talk Forms must be maintained on the 4S electronic platform and reviewed by the **Health and Safety Coordinator** at the end of the project or as required through the duration of the project.

DISTRIBUTION

Orientation shall be reviewed by all employees as follows:

- Initially, Upon Hiring
- Annually during Annual Refresher Orientations
- Hard copies shall be posted on the Safety Bulletin Board and on site
- Posted on the Gazzola website and 4S electronic platform

RECORDS

Review of the Orientation shall automatically be recorded on the 4S electronic platform upon completion for verification by Health and Safety Coordinator.

All documentation related to the JHSC will be maintained by the Health and Safety Coordinator.

All documentation related to the Management meetings will be maintained by the Health and Safety Coordinator.

All documentation related to the company-wide annual meetings will be maintained by the Health and Safety Coordinator.

Tailgate Safety Talks will be retained on the 4S electronic platform for a period of five (5) years after project completion.

Records such as Tailgate Safety Talks can be done and stored on the 4S electronic platform as required and retrieved as necessary.

COMMUNICATON

All information and documentation related to Health and Safety will be communicated with the appropriate workplace parties.

The Health & Safety Coordinator shall receive all Internal (Tailgate talks, JHSC meetings, Management meetings, Orientations...etc.) and external (MOL, WSIB, IHSA...etc.) Health and Safety communications. The H&S Coordinator will document these communications in site binders or electronically as required on Gazzola's internal server and the 4S electronic platform. The H&S coordinator will respond to these communications electronically as necessary. Hard copies of non-4S documents will be received, documented and responded to as appropriate on the site posting boards, site binders or at the head office.

Communication will be delivered in a manner that is understood by all receivers considering abilities, language skills and literacy, this may be achieved by the use of translated text or the help of bilingual workers as necessary and ensuring communication of H&S requirements is always clear, simple and straightforward.

Open communication channels apply to all meetings on this procedure providing opportunity for input from all participants.



GAZZOLA PAVING LIMITED

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TAILGATE SAFETY TALK FORM

Minimum One Meeting per Week Date: Site Location: Subcontractor: Job #: Workers in attendance: (please print) Signatures of workers: Safety topics discussed: 1. 2. 3. Record questions or suggestions made by workers: Foreman / Superintendent to ask workers if there are any hazards & to list responses. 2. ______ Foreman / Superintendent to detail how the workplace hazards listed above were corrected. 2. _____ Foreman / Superintendent Name: (Print) Foreman / Superintendent Signature:

PURPOSE

The focus of our Joint Health and Safety Committee (JHSC), when legislated to be in place, will be to ensure identified health and safety concerns are discussed between levels of management and worker on a regular basis.

SCOPE

Our JHSC, when legislated to be in place, shall be established and maintained in accordance with the Occupational Health and Safety Act and our health and safety program.

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Facilitate an election process for worker representatives. The election of the worker health
 and safety representative shall be made by workers who do not exercise managerial
 functions and who will be represented by the health and safety representative in the
 workplace.
- Appoint appropriate management representatives when required to participate in the JHSC process.
- Arrange for certification training as required for JHSC representatives and members.
- Coordinate availability and timelines of JHSC members for meetings and inspections.
- Track all near misses, first aid usage, and injuries and provide documentation for the JHSC meetings.
- Maintain all documentation related to the JHSC Terms of Reference, meetings, reports and inspections.
- Distribute and communicate information to the appropriate parties regarding any nonconformance or deficiencies reported.
- Ensure compliance with all the requirements as defined under the Occupational Health and Safety Act and Regulations.

Senior Management Responsibilities:

- Review any written recommendations and determine the appropriate action or provide a written response to the recommendations within 21 calendar days.
- Confirm, when legislation dictates, that the minimum of quarterly JHSC meetings are being held and documented.
- 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 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:

- Assist in the coordination of availability and timelines of JHSC members for meetings and inspections.
- Assist in the completion of documents and reports for tracking all near misses, first-aid usage, and injuries.
- 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 documents and reports for tracking all near misses, first-aid usage, and injuries are to be provided with documentation.
- Ensure, where reasonably possible, that every workplace party 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:

- Participate in the election process of the Non-Union Worker JHSC Representative where applicable.
- Report workplace hazards and concerns to your Foreman or JHSC Representative.
- 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 Supervisor any contravention of the Occupational Health and Safety Act and Regulations or the absence/defect in any equipment or protective device.

GAZZOLA PAVING LIMITED Revision Date: March 18, 2025

PROCEDURE

Joint Health and Safety Committees (JHSC) and Worker Representatives are an essential part of our workplace Internal Responsibility System. They help to create a greater cooperation between management and labour in mutually achieving a safe and healthy workplace. Depending on the workplace and workforce size, various types of Committees may be required, as follows;

Workplace	Workforce (All Employees)	Requirement
All workplaces	6 - 19 employees	Elected worker representative (chosen by the workers)
All workplaces	over 20 employees	Joint Health and Safety Committee required w/ worker members appointed by co-workers, management members appointed by management.
Construction Projects w/ duration of 3 months or more.	20 - 49 employees	Joint committee w/ worker members appointed by coworkers; management members appointed by management.
Workplaces or Construction Projects w/duration of 3 months or more.	50+ employees	Joint committee w/ at least 2 workers appointed by their co- workers (1certified). No greater (than worker) number of management members appointed by site management (1Certified). Worker trades committee w/ all trades represented by workers only.

Specific powers, functions and duties of the JHSC are specifically outlined under the Terms of Reference.

A Joint Health and Safety Committee will be established within our workplaces where required. All necessary procedures and forms to establish and maintain the committee are located and will cover the following Program Parts;

- 1. JHSC Membership
- 2. JHSC Duties and Conduct Terms of Reference
- 3. JHSC Meetings
- 4. JHSC Records
- 5. Recommendations to Management

Part 1: MEMBERSHIP

PURPOSE

Occupational health and safety legislation identifies, specifically, the minimum requirements and procedures for membership on the Health and Safety Committees. The membership of the committees may vary to meet location requirements, providing that it meets the minimum requirements outlined in the legislation.

PROCEDURE

Step 1

A compliant JHSC will be established on all required work locations.

Election/selection - notices/memos are to be sent to all non-union workplace parties, divisions and departments to have a representative voted and appointed by workers.

Union Worker Members will be appointed by the Union and serve as one of the worker members (where required).

Senior Management will serve as one of the management members and will choose other management members (where required).

At least 1 worker and 1 management member of each committee must be certified members. Worker members of the committee may be rotated from our workforce or from the Workers Trades Committee on a regular basis, as voted on by the committee, or as required by their specific work functions or activities.

Worker Trades Committees - A committee will be established where a specific jobsite or work location exceeds a site population of 50 workers or more workers over a consecutive 3 month timeframe.

Each JHSC will have a Memorandum defining each committee representative's names and contact information.

DISTRIBUTION

The JHSC Memorandum will be posted advising of;

- JHSC representative's names and contact information
- Certified Member (where required)

RECORDS

All documentation for the set-up of the JHSC will be maintained by the Health and Safety Coordinator.

Part 2: DUTIES AND CONDUCT

PURPOSE

The basic duties of committee members are clearly identified by legislation. Identified members of the committee should have certain duties defined so they may be prepared and familiar with their responsibilities. The acceptable conduct and forum for meetings should also be decided upon initially to avoid concerns or confusion about committee activities.

PROCEDURE

Upon the establishment of a Joint Health and Safety Committee the first order of business will be the definition of Duties and the establishment of Rules of Conduct as a JHSC Terms of Reference.

These are to include, as a minimum, requirements for members to conduct the tasks outlined under the Terms of Reference Listed on the following pages.

The Terms of Reference must be communicated at minimum annually and made part of these JHSC minutes.

DISTRIBUTION

These duties as agreed upon should be documented on this sheet and placed on the "Committee Memorandum". The "Committee Memorandum" must be

- Posted at all company locations
- Supplied to all Subcontractors on construction projects for Trade Committees
- Maintained on file for reference

RULES OF CONDUCT - TERMS OF REFERENCE

- 1. Members of the Joint Health and Safety Committee (JHSC) and other Health and Safety Representatives on site will use their position only to ensure the Health and Safety of their coworkers. If Health and Safety representatives are unable to resolve problems that are particular to their area of responsibility through the Internal Responsibility System (i.e. reporting to Supervisor and Superintendent), then these concerns should be brought before the JHSC, or Worker Trades Committee.
- 2. Meetings of the JHSC are to be held quarterly on a scheduled basis and posted within each location.
- Topics for future meetings will be discussed by the committees at the end of each meeting
 consisting of unresolved topics, objectives to complete action items and new or upcoming
 topics or concerns.
- 4. Minutes will be kept of each meeting where each of the respective co-chairpersons may take notes and a formal recorded of each meeting will be produced by the secretary.

- 5. These meeting minutes will be reviewed by the co-chairpersons and then distributed within seven days of the meeting to all members of the committee, and additional copies will be placed on file and will also be posted in all workplaces.
- 6. A workplace Health & Safety inspection will be conducted by one member of the JHSC at least once per month and one week prior to the next upcoming meeting. Inspections will be submitted to Senior Management immediately for follow-up and then subsequently reviewed at the next committee meeting
- 7. Attendance is mandatory at all scheduled meetings by every member of the respective committees. There must be at least two management and two worker members present to have a quorum.
- 8. 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. Unmanageable arguments will be cause for discontinuing the meeting or asking the offending parties to leave the meeting.
- 9. Unscheduled interruptions of meetings will not be accepted. If absolutely necessary, and agreed upon, breaks may be requested but must be kept to a minimum.
- 10. Formal recommendations for improvement of workplace conditions should contain the following information and be presented on the appropriate form to be accepted by management:
 - Reason for recommendation (identify hazard)
 - Outline for requirements (what measures, procedures or equipment are being requested)
 - Time requirements for implementation
 - Time expectations for a response in writing (maximum 21 days)
- 11. All concerns or questions between the respective committee meetings are to be addressed immediately with the co-chairperson if it cannot be resolved through the Internal Responsibility System.
- 12. Decisions are to be made as a group wherever possible, with majority rule presiding. Guests do not maintain a vote, management and labour representation should remain equal with management not to exceed labour.
- 13. Topics and issues presented must deal only with Occupational Health and Safety of all locations. The JHSC will not be a forum for general concerns.
- 14. For the purposes of maintaining good employment relations, all members are requested not to abuse the time given for these meetings and for duties assigned by the committee outside their regular job functions.
- 15. Guests may be invited to meetings, from time to time, when agreed upon by the committee (e.g. Construction Safety Association Personnel, M.O.L. Inspectors, etc...)

GAZZOLA PAVING LIMITED Revision Date: March 18, 2025

- 16. Committee structure and functions will be followed as outlined in the Occupational Health & Safety Act and/or proposed committee structure
- 17. Pro-active participation is required by all members; therefore, leading by example is expected in the workplace.
- 18. Committee meetings are anticipated to be no longer than 1 hour unless agreed upon by the JHSC.
- 19. The Workers Trade Committee will be established when 50 or more workers are present on any site lasting more than 3 months. The Workers Trade Committee will meet on a scheduled basis with minutes provided to JHSC.

Note: The fundamental intent of the Joint Health & Safety Committee is to work collectively to ensure the Safety and Health of our workers and our environment. These Terms of Reference have been communicated to all JHSC members

Part 3: MEETINGS

PURPOSE

Meetings of the Joint Health and Safety Committee and Worker Trades Committee are required by legislation. These meetings are an effective method for determining unsafe conditions or acts on the project through worker input. Management/Labour co-operation, at these meetings, may also increase safety awareness and limit undesired occurrences.

PROCEDURE

Frequency - Legislation requires that Joint Health and Safety Committees meet at minimum quarterly.

- Step 1; A schedule for meetings must be prepared during the first meeting and voted on. This should be based on the activity and number of workers for all locations.
- Step 2; A schedule for the Worker Trades Committee should be prepared and voted on. (to be used when site population reaches 50+ workers)

DISTRIBUTION

Meetings - Certain documents should be prepared by the Committee(s) to meet legislated requirements and good committee practice.

- **Item 1 AGENDA** An agenda should be prepared for each meeting identifying concerns and topics to be discussed in addition to New Business.
- **Item 2 MINUTES** Accurate minutes must be kept for the JHSC meetings.
- **Item 3 RECOMMENDATIONS & RESPONSE** Where a committee makes a formal recommendation to management to improve safety or health conditions a response must be provided, in writing, within 21 days.
- **Item 4 WORK REFUSALS** Where a Work Refusal occurs, an investigation must be conducted by the selected committee members, documentation must be maintained (use "Accident Investigation" form)

RECORDS

All the above noted documents must be:

- Posted in the workplace
- Provided to committee members
- Available for Government Inspection

GAZZOLA PAVING LIMITED Revision Date: March 18, 2025

Part 4: COMMITTEE RECORDS

PURPOSE

All records and reports of the Joint Health and Safety Committee must be maintained readily available for Government Inspection to demonstrate compliance.

Although committee records are generally available to all persons in the workplace, some documents or information to which the committee has access may be considered confidential. The committee must be aware of this responsibility and act accordingly.

RECORDS

The following is a list of all documents which must be stored in a separate filing system available specifically for members of the committee;

- Meeting Agendas
- Meeting Minutes
- Monthly Workplace Safety Inspection Reports & Follow-up
- Accident Investigations involving the JHSC Critical
- Work Refusals & Unilateral Work Stoppage
- Recommendations to Management
- Response from Management
- Committee Memorandums

Due to the confidentiality of some of this information access to files will be restricted to committee members accompanied by the Senior Management and the JHSC Members.

Part 5: RECOMMENDATIONS

PURPOSE

The purpose of formal JHSC recommendations, is to provide a system for the committee to identify workplace health and safety concerns and ensure that they are communicated to management personnel who may not be on the committee. Through this process, the committee places the onus on management to review each recommendation, make specific decision and respond in writing.

At all of our locations, we realize that most safety matters can be resolved or implemented through verbal discussions and immediate actions, however, in the event that a problem is over looked or not given the appropriate attention (as deemed by the committee), the process of making a written recommendation to management will be available.

PROCEDURE

Any committee member will be allowed to make written recommendations to management. The Recommendation forms for making recommendation to management are provided in the JHSC binder. The committee member will complete the form and present it to the Management Co-Chairperson.

Once obtained by the JHSC Members, the recommendation will be reviewed with Senior Management. Senior Management then has the obligation to respond to the recommendation in writing within 21 days. The appropriate forms for Responding to Recommendations are located under this section.

Senior Management will respond to written recommendations as soon as possible and in any event no later than 21 days from the day that the recommendation was provided by the Cochairperson.

DISTRIBUTION

All recommendations must be provided to the **Senior Management** by the **Health and Safety Coordinator**. All responses to recommendations must be returned back to the committee member who made the recommendation (within 21 Days).

Responses to recommendations will be provided to all committee members and posted at all locations.

RECORDS

All recommendations made to management, will be retained on file for a period of up to five (5) years.



GAZZOLA PAVING LIMITED Workplace Inspections Policy Statement

Gazzola Paving Limited is committed to conducting workplace inspections in compliance with the Occupational Health & Safety Act and the applicable Regulations. Workplace Inspections are conducted to identify, monitor, follow-up and control or eliminate all hazards.

To that purpose, Gazzola Paving Limited will ensure that all locations and sites where work is being performed by Gazzola Paving Limited undergo workplace inspections including machines and equipment pre-use inspections. Inspections will be completed and documented by the applicable personnel and adhering to the regulated frequencies. Documented inspections must identify deficiencies and corrective actions taken or a schedule for correction and follow-up when necessary.

Gazzola Paving Limited will ensure that inspections checklists and reports consider all legal requirements, applicable standards and guidelines including the Occupational Health & Safety Act & Regulations in addition to considering manufacturer's specifications for machines & equipment.

Gazzola Paving Limited will communicate the results of workplace inspections with all relevant workplace parties including senior management regularly to ensure actions are agreed and follow-up is done when needed. Supervisors will be responsible for including sub-contractors in the process of Inspections when required.

In addition to Inspections performed by workers and Operators of equipment, all workers are encouraged to participate in the Inspections process by raising concerns and pointing out hazards to the Supervisors, providing input and feedback through suggestions and recommendations.

Virgil Jazzola, Vice-President

March 18, 2025

Date

PURPOSE

Workplace inspections will be conducted to identify, monitor, follow-up and control or eliminate all hazards in compliance with the Occupational Health & Safety Act and the applicable Regulations.

SCOPE

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

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Will schedule each Health and Safety Worker Representative to conduct his/her scheduled inspection at minimum monthly or as directed by the inspection schedules at their current workplace location.
- 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 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:

- 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:

- Ensure the Pre-Use Inspections are available to be used to record the vehicle or equipment specific health and safety condition and observations.
- Distribute and communicate information to the appropriate parties regarding any nonconformance or deficiencies reported.
- 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 on all projects under authority according to the schedule and site-specific needs.
- Record the findings, observations and follow up activities on the Workplace Inspection form to demonstrate compliance.
- Ensure site locations that are scheduled to last 5 working days or longer during a standard work week, have a minimum of one weekly workplace inspection completed. This Weekly workplace inspection requirement extends to sites where we operate as either a Contractor or Constructor.
- Ensure appropriate completion of all pre-use inspections for various equipment/machinery.
- Review findings of workplace and/or pre-use inspections with each Foreman to ensure nonconformities are identified to correct each unsafe condition.
- Assist in the follow-up on the findings and correction of each unsafe condition.
- Ensure that copies of completed workplace inspections and pre-use inspections are submitted electronically on the 4S electronic platform for review and recording purposes.
- 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 workplace inspections with the Superintendent to identify unsafe conditions noted on the inspection report.
- Ensure appropriate completion of all pre-use inspections for various equipment/machinery.
- Participate in the review of the completed Pre-use inspections with the Superintendent to identify unsafe conditions noted on the inspection reports.
- 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 Workplace inspections as required.
- When as an approved operator, conduct pre-use inspections using the 4S electronic platform.

GAZZOLA PAVING LIMITED
Revision Date: March 18, 2025

- Record the findings, observations and follow up activities on the appropriate Pre-use inspection form to demonstrate compliance.
- Record all observations that demonstrate compliance and non-compliance as found during the inspections process.
- 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.

PROCEDURE:

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

Formal Inspection Report Forms detailing the findings, and corrective actions taken will be available on the 4S consulting platform. The Inspection schedule will be at the discretion of the Worker, Foreman or Superintendent or Health and Safey Worker Representative as is as follows:

Inspector	Frequency of Inspection	Date/ Day
Superintendent or Foreman	Weekly	To be determined at their location.
Health and Safey Worker Representative	Monthly	To be determined at their Site/ Industrial / Office location.
Workers	Daily	Pre-use inspections for vehicles, machinery, tools or equipment

WORKPLACE INSPECTIONS:

The **Health and Safety Worker Representative** will conduct his/her scheduled location specific workplace inspection using **the 4S consulting platform** for the office, maintenance shop, and the asphalt plant at minimum monthly or as directed by the inspection schedule at their current workplace location.

The **Superintendent** or **Foreman** will conduct a site level inspection using the 4S consulting platform at minimum Weekly as directed by the inspection schedule.

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

Ris	Risk Rating: (Risk Rating takes into account the Frequency and Severity of the Hazard)						
	Frequency						
		Severity	Low (Monthly)	Medium (Weekly)	High (Daily)		
	Low (F	First Aid/Minor property damage)	С	В	В		
	Mediu	m (Medical Aid/Moderate property damag	e) C	В	Α		
	High (Critical Injury/High property damage)	В	Α	Α		
	<u> </u>						
	C Low Risk: Low risk of injury or equipment / property damage.						
	В	Medium Risk: Medi	Medium risk of injury or equipment / property damage.				
	Α	High Risk: High	High risk of injury or equipment / property damage.				

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

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

PRE-USE INSPECTIONS:

Pre-Operation Checklists of our commercial mobile vehicles (CVOR), machinery and/or equipment will be performed to ensure they maintain functionality in accordance with the manufacturer specifications and the legislative requirements.

Trucks, Vehicles and Equipment which are CVOR registered, or site equipment, are required to be inspected every day at the beginning of a work shift prior to being used. Forms to be used for this purpose can be found on the 4S electronic platform. The inspections conducted daily by the worker will be called:

- Vehicle Circle Check
- Equipment Pre-Operational Checklist

The Pre-Use Inspection requirements include a specific list of inspection items that must be on the inspection checklists and that the workers must ensure to follow the schedule for inspection at all times.

Any employee operating their own personal vehicle for authorized company business must have an appropriate class of license for the vehicle being operated and appropriate insurance coverage for operating a personal vehicle for business use. These vehicles do not require the use of our pre-use inspection forms.

<u>Step 1</u> All commercial licensed vehicles requiring CVOR compliance or exceeding 4500 Kg in weight will be inspected on the 4S electronic platform using the Vehicle Circle Check.

- All Mobile equipment and/or required machinery/ tools will be inspected on the 4S electronic platform using the appropriate Equipment Pre-Operational Check by the competent/trained operator.
- <u>Step 3</u> The **Project Manager** shall ensure availability and/or obtain all completed inspection checklists for various equipment/machinery (i.e. commercial licensed mobile vehicles, Equipment and Machinery).
- <u>Step 4</u> Reported defects or other deficiencies observed during pre-use inspections are documented on our inspection forms. Substandard or otherwise unsafe conditions must be rectified and made safe.
- **Note:** If a hazardous condition is identified, the vehicle, equipment / machinery must not be used, rather taken out of service (locked out) and tagged until repairs or adjustments have been made by an authorized person. The Foreman or Superintendent must be made aware of the circumstances immediately and given a copy of the inspection report and contact the appropriate certified service provider.

DISTRIBUTION:

All inspection reports will be maintained on the 4S consulting platform upon completion for retrieval by the Superintendent, Foreman and or Health and Safety Coordinator.

RECORDS:

Through the duration of the workplace inspection forms within our locations, all completed Workplace Inspections can be found on the 4S consulting platform and reviewed by the **Health and Safety Coordinator**.

The workplace inspection report forms including any corrective actions or any subsequent followup must be maintained on file for the duration of the project or facility and subsequently retained on file for seven years.

All pre- use inspections of vehicles, tools, machines and equipment will be conducted and maintained including any identified corrective actions on the 4S electronic platform for retrieval by the individual operators / drivers, Health and Safety Co-ordinator and shop forepersons.

All inspections forms can be retrieved by the operators / drivers, should they be requested by the police, Ministry of Transportation representative or Ministry of Labour representative. These forms can be forwarded by email upon the officer or representative request.

COMMUNICATION

All significant information concerning workplace inspection and pre-use inspection reports will be communicated with senior management and the Joint Health and Safety Committee/Health and Safety Representative on a regular basis at the Management and the JHSC meetings. Potential communication with sub-contractors will be done on site by the Supervisor if required.

Gazzola Paving Limited is committed to conducting incident investigations to determine the causes and contributing factors. Determining the appropriate conclusions will result in implementing the proper corrective and preventive measures to help prevent a reoccurrence.

It is the responsibility of all workers to report all incidents including near misses immediately to their direct supervisor. Subcontractors are required to report all incidents to Gazzola Paving Limited's Site Superintendent immediately. When needed, Supervisors will start an incident investigation in a timely manner.

Gazzola Paving Limited will ensure that all Investigations team members including all supervisors are trained on the legislative and company specific reporting requirement and investigations procedures. The investigation team is responsible for the determination of any Health & Safety deficiencies including the root causes of the incident to help decide on the necessary actions.

Completed Investigations will be documented for communication and continuous improvement purposes.

Gazzola Paving Limited commits to follow all legislative incident notification requirements mentioned in the Occupational Health & Safety Act and the applicable regulations.

Gazzola Paving Limited will communicate the results of incident investigations with all relevant workplace parties including senior management regularly to ensure actions are agreed and follow-up is completed when needed. Supervisors will be responsible for including sub-contractors in the process of Investigations when required.

Corrective and Preventive actions implemented as a result of an incident investigation will be assessed for effectiveness to ensure they are serving the main goal of preventing reoccurrence of incidents.

Virgil Gazzola, Vice-President

March 18, 2025

Date

PURPOSE

Hazard and Incident Reporting will be used as a recording and follow up method to provide specific documentation on current health and safety related issues for all workplace parties and at all locations.

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.

SCOPE

All incidents, occupational injuries, illnesses and near misses must be reported to allow the company the opportunity to take corrective actions to prevent reoccurrence and to ensure that the proper documentation of these injuries or illnesses is completed.

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

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Instruct workforce to report hazards and incidents including near misses to ensure they are reported and appropriate follow up actions are completed.
- Review all incident or investigation reports and follow up with Superintendents and Foreman as required.
- Retain all records of Incident Reports and follow up actions as required.
- Ensure all required incidents are investigated and appropriate follow up actions are completed.
- Participate in the Investigation process and follow-up 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 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.

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:

- Ensure all required hazards and near misses are reported and appropriate follow up actions are completed.
- Ensure completion of applicable Incident Reports and follow up as required.
- Review reported findings with each Foreman to ensure identified corrective actions to each unsafe condition.
- Conduct the Workplace Investigation and complete all required reports required by the situation.
- Ensure accurate recording of Voluntary Witness Statements where required.
- Document and determine the causes, contributing factors and subsequently implement corrective actions to prevent a reoccurrence from the incident.
- Ensure each recommendation on the Investigation Report 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 respond to all hazards or near misses reported and record the findings.
- Immediately report all incidents that require an investigation to be conducted to the Superintendent, and/or Health and Safety Coordinator where required.
- Document and determine the causes, contributing factors and subsequently implement corrective actions to prevent a reoccurrence from any Hazard Reported.
- Complete corrective actions where possible. Where corrective actions cannot be completed, contact the Superintendent and or the Health and Safety Coordinator to provide further assistance.
- Ensure each recommendation found on the Incident Report is completed within the established timelines.
- Manage the accident scene and identify witnesses.
- Assist in the completion of the Workplace Investigation & incident reports as required.
- 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 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:

- Assist or participate in the workplace investigation & reports as required.
- Provide statements and incident summaries as requested by the Superintendent or Foreman.
- 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 injuries, incidents, contravention of the Occupational Health and Safety Act and Regulations or the absence/defect in any equipment or protective device.

REPORTING PROCEDURE

Initial Notification

- Employees shall notify the foreman of all incients including near missies as soon as possible, and before the end of the workday on which the incident took place.
- Reporting must be initially conducted verbally.
- The Foreman or the worker must complete Accident / Incident Reporting Form electronically on the 4S consulting platform, completing the form to the best of their ability including pictures when possible. The report should include at a minimum:
 - Names and occupation of employees involved in the incident;
 - Date and time of the actual incident;
 - Date and time of when the incident was reported;
 - Location of the incident on the project;
 - A brief incident description.
- The Health and Safety Team, supported by the Health and Safety Coordinator, will review the report and will determine the investigation requirements based on the evidence available.
- The Superintendent and/or the Health and Safety Coordinator to provide further assistance for investigation and corrective actions.
- The Health and Safety Team shall assume responsibility for notifying all other appropriate employees and/or regulatory agencies based on the event and severity.

INVESTIGATION PROCEDURE

A formal investigation will be conducted regarding incidents as following;

* Outside Medical Aid Required,

- * Critical Injuries
- * Property Damage
- * Work Refusals
- Notices Required by Governing Authorities
- * Fires
- * Acts of Violence or Harassing Situations

Investigation Team

The Superintendent will conduct the investigations with the assistance of the Foreman and where required the Health and Safety Coordinator. Members of the investigation team will be provided appropriate training in legislative and organization specific investigation requirements and techniques through their Supervisory Awareness & Company Policies Training.

The investigation team will be required to:

- Determine the events leading up to the incident,
- Formulate conclusions as to the likely cause of the incident
- Recommend action to prevent a reoccurrence of the same or similar incident

Gathering Information

After an incident has occurred, the Supervisor will open a file to collect all information relevant to the incident is gathered during the investigation process. This will include information such as:

- Copies of any Job Hazard Assessment completed or reviewed prior to the incident;
- Voluntary Witness statements;
- Incident Form with photographs and/or sketches of the incident scene;
- Copies of hot work or confined space permits and isolation certificates (if applicable);
- Copies of Toolbox Talks;
- Copies of any relevant certification, such as lifting equipment;
- Copies of any incident-related correspondence.

If at any point in the investigation an enforcement authority or external agency becomes involved, the Health and Safety Team will obtain a copy of their report for the incident file.

Investigation Techniques

An investigation will begin as soon as the incident notification is made to a Supervisor, Health and Safety Team, or, any first aid treatment or medical care has been provided. The Supervisor will perform an incident investigation with the assistance of witnesses, the injured or ill employee (if applicable), and the Health and Safety Team and/or any other subject-matter specialist who may be contacted throughout the duration of the investigation. All documents, including photographs, collected during the investigation will be included in the final report.

While investigating, the following questions shall be considered by the investigator or investigation team:

Where and when did the incident occur?

- What happened?
- Who was involved?
- Who, if anyone, witnessed the incident?
- What were the actual injuries or damage?
- What was the risk of injury or damage?
- Were all those involved trained, competent, and fully briefed?
- Who was in control of the activity?
- Was a suitable and sufficient risk assessment in place?
- What training or instructions had been given?
- How should the work have been carried out?
- Why were things planned as they were?
- What changed; that is, were there deviations from plans or norms?
- Have root causes been identified?

Finding the facts shall include:

- Inspection of the site;
- Gathering physical evidence;
- Gathering technical evidence;
- Testing or reconstruction;
- Collecting documentation, including:
 - Safety Management System documentation;
 - Interface arrangements;
 - Permit to work and written instructions;
 - Witness evidence and interviews.

Investigation Process

Note: The following are procedures to be followed in the event of a workplace incident / accident / work-refusal or notification of an unsafe condition.

1. When required, arrange for injured workers to be taken to the Medical Clinic or the Hospital depending on the severity.

Refer to and follow the appropriate steps listed for;

- Incidents/Accidents involving our Workers
- Incidents/Accidents involving Subcontractors
- 2. Secure the accident scene and ensure that it is not disturbed.
- 3. Do not allow similar work to continue on the site unless steps to prevent a recurrence are in place and authorization has been given by the Superintendent and/or the Ministry of Labour (where applicable).
- 4. Notify Senior Management and the Health and Safety Coordinator immediately.
- 5. Begin the Investigation (if authorized by the Superintendent and when required by the Ministry of Labour).

- A. Assessment of the Scene: inspect equipment/material that was involved in the incident. Ensure you use drawings, sketches and take photographs of the incident scene indicating sizes, distances, and weights of objects. Identify any contributing factors to determine the root cause(s) of the incident.
- B. Interviewing: ensure to interview eyewitnesses, people involved. Interviewing should be conducted as soon as possible by the person conducting the investigation and shall be conducted in a private place, away from any commotion.
- 6. Submit all the Investigation & Reporting Forms and/or other information to the Health and Safety Coordinator for review and distribution.

NEVER DISTRIBUTE INFORMATION TO OTHERS WITHOUT PERMISSION FROM SENIOR MANAGEMENT.

Refer to the appendix (attached to this section) for the following:

- Ministry of Labour Reportable Incidents/ Accidents
- Transportation of Injured Workers
- Accidents Involving our Workers
- Accidents Involving Subcontractors
- Refusal to Work

Root cause analysis

Root cause analysis is:

- A process for analysing incidents.
- A means of providing objective results.
- A means that allows appropriate corrective actions to be identified which, if implemented, will prevent similar incidents happening in the future.
- A means to provide a link between root cause and performance standards.

There are two sets of causes which investigators will need to identify during the investigation:

- 1. The immediate cause of the incident (root cause): unsafe practices or conditions which caused the incident, e.g. employees working, equipment, material, environment and processes; and
- 2. The contributing causes: the factors that enabled the unsafe practices or conditions to occur e.g. lack of monitoring, lack of enforcement, etc.

All major and severe incident investigations will include a review to determine the immediate causes and the system causes of the incident. Identification of system causes of an incident will usually reveal or lead to underlying management system failures that contributed to the incident happening. The contributing causes shall be identified determine recommendations to prevent recurrence.

Recommendations

The investigation will identify the causes of the incident and assist in identifying the recommendations (corrective and preventive actions) to correct the unsafe conditions. The recommendations shall be practical and realistic to increase the credibility of the investigation procedure. The recommendations shall be implemented in a timely manner. Any changes made will be at one, or a combination of, the following locations:

- 1. At the source of the hazard (e.g. install permanent guard on machinery);
- 2. Along the path of the hazard to the employee (e.g. setting up barriers);
- 3. At the employee (e.g. using PPE).

Communication

The investigation results including all corrective and preventive actions taken will be communicated to employees using bulletin boards, meetings, signs and relevant traning.

Final Report

The investigation team will complet the investigation using the Accident Investigation Reporting Form on the 4S consulting platform.

The Health and Safety Coordinator will review the completed report and may request further amendments be made by the reporting Supervisor/ Health and Safety Team member to any aspect of the report prior to final approval.

Major and severe incidents may be provided additional time to complete the final report due to a variety of factors which could extend the length of the investigation including, but not limited to:

- Complexity of the incident;
- Equipment or machinery involved;
- Number of employees involved and witnesses to the incident;
- Size of environmental spill and cleanup; or
- Additional research required (including subject matter experts) to assist in providing understanding of the incident and appropriate corrective actions.

Extensions will be considered and approved by the Health and Safety Coordinator on a case by case basis upon request from the reporting Supervisor/Health and Safety Team. An extension may only be considered for the final report.

Follow up

The implemented controls shall meet the following criteria:

- 1. Eliminate danger to the employee:
- 2. Does not make work more stressful or uncomfortable;
- 3. Protects all employees likely to be exposed;
- 4. Does not create external environmental hazards:
- 5. Does not create new hazards.

Completed investigation reports will be discussed regularly during JHSC meetings to measure the effectiveness of corrective and preventive actions and to determine if further actions are required.

Supervisors will continually monitor the changes and the performance of employees related to the changes to ensure there are no additional hazards.

DISTRIBUTION

The Investigation reports will be kept on the 4S consulting platform for retrieval by the **Health and Safety Coordinator** after completion of each Investigation.

RECORDS

All records will be maintained on electronically on the 4S consulting platform. These records are to be reviewed to determine the need for ongoing file maintenance. All Investigation reports will be maintained for minimum three (3) years.

Appendix

Reportable Incident/Accidents

The following reporting requirements are only a summary of reporting requirements from the Occupational Health and Safety Act (OHSA) and Ontario Regulation 420/21: (Notices and reports under sections 51 to 53.1 of the Act – Fatalaties, Critical Injuries, Occupational Illnesses and other incidents). For a complete listing of the reporting requirements refer to the OHSA & Reg. 420/21.

Section 51 of the Occupational Health and Safety Act requires the Constructor and the Employer to report "Fatalities" or "Critical Injuries" immediately to:

- 1- The Ministry of Labour, Training & Skills Development (MLTSD).
- 2- The Joint Health & Safety Committee (JHSC), Health & Safety Representative and trade union if any

In addition to immediate reporting, the employer is to provide a written report, within 48 hours, containing such information as prescribed by Regulation 420/21.

"CRITICAL INJURY" (Regulation 420/21)

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

In accordance with the Occupational Health & Safety Act (OHSA) Section 9 (31), the designated worker member(s) of the Joint Health & Safety Committee (JHSC) have the right to investigate cases of fatalities or critical injuries in addition to inspecting the accident scene and any machine or device involved. Any findings shall be reported to the (MLTSD) and to the (JHSC).

Section 52 of the Occupational Health and Safety Act requires the **employer** provide notice of accident, explosion, fire, or incident of workplace violence which does not result in a critical injury to the worker, however, disables the worker from performing regular duties or requires medical attention. This also includes the onset of an Occupational Illness

Notice must contain such information as prescribed by Regulation 420/21 and is to be provided within four days of the occurrence to:

- 1- The Joint Health & Safety Committee (JHSC), Health & Safety Representative and trade union if any
- 2- The Ministry of Labour, Training & Skills Development (MLTSD), <u>If required by an inspector.</u>

Section 53 of the Occupational Health and Safety Act requires that the **Constructor** provides notice in writing in the event of an accident, premature or unexpected explosion, fire, flood or inrush of water, failure of any equipment, machine device article or thing, cave-in, subsidence or other incident as prescribed

Notice must contain such information as prescribed by Regulation 420/21 and is to be provided within two days of the occurrence to:

1- The Joint Health & Safety Committee (JHSC), Health & Safety Representative and trade union if any

The Ministry of Labour, Training & Skills Development (MLTSD), <u>unless a report under section 51 or a notice under section 52 has already been provided.</u> Prescribed reportable incidents --- section 4 Reg. 420/21, where Ontario Regulation 213/91 (Construction Projects) made under the (OHSA) applies;

- 1. A worker falling a vertical distance of three metres or more
- 2. A worker who falls and whose fall is arrested by a fall arrest system
- 3. A worker becoming unconscious for any reason
- 4. Accidental contact by a worker or by a worker's tool or equipment with energized electrical equipment, installations or conductors.
- 5. Accidental contact by a crane, similar hoisting device, backhoe, power shovel or other vehicle or equipment or its load with an energized electrical conductor rated at more than 750 volts.
- 6. Structural failure of all or part of falsework designed by, or required by the regulation to be designed by, a professional engineer
- 7. Structural failure of a principal supporting member, including a column, beam, wall or truss, of a structure
- 8. Failure of all or part of the structural supports of a scaffold
- 9. 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
- 10. 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
- 11. Overturning or the structural failure of all or part of a crane or similar hoisting device

Section 53.1 of the Occupational Health and Safety Act requires that any additional notice requirements must be met, as prescribed by the regulations, including specifying who is required to provide the notice, the timeframe in which it shall be provided and the information and particulars it must contain.

In accordance with section 5 Reg. 420/21, the Constructor or Employer (where the incident occurs at a workplace where Ontario Regulation 213/91 "Construction Projects" made under the Act applies) who submit a written report under section 51 of the Act or a written notice under section 52 or 53 of the Act, shall supplement the report or notice with a professional engineer's written opinion stating the cause of the occurrence if it involves a failure of all or part of.

- (i) temporary or permanent works,
- (ii) a structure,
- (iii) a wall of an excavation or of similar earthwork for which a professional engineer has given written opinion that the stability of the wall is such that no worker will be endangered by it, or (iv) a crane or similar hoisting device;

Section 10 - Investigations & Reporting

Policy for Transportation of Injured Workers

The following Policy applies to the transportation of injured workers to a Hospital, Doctor's Office or Medical Walk-in-Clinic.

- 1. In cases of serious accidents, where the possible improper movement (transportation) of an injured worker could result in further injuries or unnecessary pain to the injured worker, an ambulance must be called (911 where applicable)
- 2. In cases when it is deemed necessary (after First-Aid has been administered) to have the injured worker seek further medical treatment and the transportation of the injured worker is not going to cause further injuries or pain to the worker, the Superintendent / Foreman will make arrangements for the injured worker to be transported immediately (i.e. the company will transport the worker or call a taxi service);

Notes:

- Under no circumstances is a Superintendent / Foreman to allow a worker who sustains a
 workplace injury to transport themselves to a medical facility or doctor's office.
- If the worker is transported to a medical facility either by a taxi or the company directly, a
 representative from the company shall accompany the injured worker (with the applicable
 forms) to the medical facility and stay with the worker at minimum until he/ she is admitted.
- 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 workers native language and English must be sent with the injured worker to the medical facility.
- If the injured worker refuses the provided transportation, alternative arrangements shall be made, as necessary, and in conjunction with Senior Management, and other parties as applicable.

Accidents Involving Our Workers

When one of our employees sustains a workplace injury, follow the procedures listed below;

Superintendent and/or Foreman must;

- ensure first aid is administered if required/possible and it is safe to do so
- make arrangements for transportation including calling 911 if applicable or using company vehicles to a Medical Clinic or Hospital (whichever is appropriate). All injured workers must be accompanied by another company representative when being transported to a Medical Clinic or Hospital
- initiate the emergency plan and secure the accident scene if required. (based on the circumstance take the necessary precautions for the safety of the injured worker and/or others)
- immediately notify the **Superintendent** and our Health and Safety Coordinator
- take names and phone numbers of any and all persons who witnessed or may have knowledge of the accident (statements will need to be taken during the investigation)
- take photographs and/or sketches of the incident scene;
- conduct an Investigation (when granted permission from the **Superintendent** and the Ministry of Labour where applicable)
- ensure corrective measures are implemented prior to allowing work to continue
- maintain contact with the injured worker and assist in the Early Safe Return To Work program for the injured worker when applicable

Critical Injury Accidents;

Take all steps listed above and furthermore ensure the following;

- the **Health and Safety Coordinator** notification to Ministry of Labour (MOL), Worker Health and Safety Representative, and where applicable, the union, to immediately when approved from Senior Management.
- the Health and Safety Coordinator prepare written notices to the MOL with the assistance of a Safety Consultant and/or legal counsel where required and review with the Senior Management Team prior to delivery
- cooperate with the Ministry of Labour (MOL) during their investigation

The Superintendent Will Ensure;

- the Management Team and Health and Safety Coordinator have been informed of the investigation
- in the event of a Critical Injury, provide assistance with the investigation, seek Legal Counsel (if required) and communicate with the Ministry of Labour (if required)
- review the accident investigation report(s) and any Notices to be sent to the Ministry of Labour as required
- take appropriate measures to implement corrective actions
- investigation reports are received by the Health and Safety Coordinator and reports are sent to WSIB as required. Where required make arrangements and assist in the Return to Work.

Accidents Involving Subcontractors

In the event of an incident/accident caused by a subcontractor or accident causing an injury to a sub-contractor's worker, follow the procedures below as a minimum;

Superintendent and/or Foreman must;

- ensure first aid is administered if required/possible and it is safe to do so
- assist in make arrangements for transportation to a Medical Facility if necessary
- initiate the emergency plan and secure the accident scene if require. (based on the circumstance take the necessary precautions for the safety of the injured worker and/or others)
- immediately notify the Subcontractors Management
- take names and phone numbers of any and all persons who witnessed or may have knowledge of the accident (statements will need to be taken during the investigation)
- assist in conducting an Investigation when granted permission from the Superintendent (and the Ministry of Labour where applicable)
- request that the subcontractor conducts an investigation into the matter and provides a copy of the investigation report, photographs and statements to our company
- ensure that the subcontractor provides appropriate notification to the governing authorities such as the Ministry of Labour and provide written copies of notices.
- only allow the subcontractor to continue with the work if acceptable measures have been taken to prevent a recurrence

Critical Injury Accidents;

Follow all steps as above and furthermore ensure the following;

- notification to Ministry of Labour (MOL) and the union immediately
- prepare written notices to the MOL with the assistance of the Health and Safety Coordinator and/or legal counsel where required and review with the Management Team prior to sending
- cooperate with the Ministry of Labour (MOL) during their investigation

The Superintendent Will Ensure;

- the Management Team and Health and Safety Coordinator has been informed of the accident
- in the event of a Critical Injury, provide assistance with the investigation, seek Legal Counsel (if required) and communicate with the Ministry of Labour
- assist the Supervisor in the event of a MOL reportable incident/accident and obtain copies of any orders or charges given to the subcontractor(s) and/or the Constructor
- review the accident investigation report(s) and any Notices to be sent to the Ministry of Labour
- review the accident investigation report(s) and take appropriate measures to implement corrective measures
- ensure updates and reports are provided to Senior Management

Section 10 – Investigations & Reporting

Refusal to Work

DEFINITION: A worker may refuse to work or do particular work where he or she has reason to believe that;

- A) Any equipment, machine, device or thing the worker is to use or operate is likely to endanger himself, herself or another worker;
- B) The physical condition of the workplace or the part thereof in which he or she works or is to work is likely to endanger himself or herself;
- B1) Workplace violence is likely to endanger himself or herself; or
- C) Any equipment, machine, device or thing he or she is to use or operate or the physical condition of the workplace or the part thereof in which he or she works or is to work is in contravention of this Act or the regulations and such contravention is likely to endanger himself, herself or another worker. R.S.O. 1990, c. O.1, s. 43 (3); 2009, c. 23, s. 4 (2).
- ** That person may refuse to use or operate the machine device or other thing, or to work in that place.

Steps to be Taken

- 1) Worker refuses to work and immediately notifies employer or supervisor of the reasons.
- 2) Supervisor investigates, in the presence of the worker and Joint Health And Safety Committee worker representative. Involve the Supervisor in the investigation stage of the Work Refusal. Notify the Management Team.
- 3) Worker remains in a safe place near work-station and be available for questioning, all attempts are made to resolve the perceived problem to the satisfaction of all parties.
- 4) If problem is resolved to the workers' satisfaction, he/she returns to work.
- 5) If not resolved and worker continues to refuse work, NOTIFY THE MINISTRY OF LABOUR.

NOTE: Another worker may be asked to perform the job, only if that worker is advised of the refusal to work and the surrounding circumstances, in the presence of the worker Health & Safety Representative.

6) A Ministry of Labour Inspector investigates the refusal in consultation with the worker, employer and the worker representative of the J.H.& S.C..

- 7) Pending the outcome of the investigation, the worker may stand by or be assigned other work. The worker may NOT be sent home or disciplined for his/her actions.
- 8) A decision will be made in writing and provided to all parties. This decision must be adhered to whether in favour of the worker or employer.
- 9) An Investigation report must be completed by the supervisor or contractor employing the worker refusing work and the worker representative present during the investigation. This report must be provided to the Senior Management Team and the JHSC.

All attempts should be made to resolve the problem internally before it requires Ministry of Labour involvement.



GAZZOLA PAVING LIMITED Emergency Preparedness Policy Statement

Gazzola Paving Limited is committed to the prevention of injury or occupational illness, limiting suffering and losses by ensuring all employees are equipped with an appropriate immediate response to all identified emergency situations. To that end, Gazzola Paving Limited will identify all potential emergency situations applicable to the nature of the work and will identify the proper resources needed to react to these situations properly. Emergency equipment deemed to be necessary will be provided for all locations, well-marked and regularly inspected and maintained.

Gazzola Paving Limited will document appropriate response plans to all emergency situations identified that will include the responsibilities of different workplace parties in cases of emergency for all locations where work is being performed. All employees will be trained on the relevant emergency response plans relevant to their work location.

Everyone at Gazzola Paving Limited is required to understand, follow and undertake their roles and responsibilities under the emergency response plans to reach the goal of limiting suffering, losses and resume normal work as soon as reasonably possible in the event of an emergency situation.

Gazzola Paving Limited will initiate different types of emergency drills to assess the effectiveness of the emergency response plans and take corrective actions when needed. Emergency procedures and response plans will also be reviewed at least annually in the pursuit of continuous improvement and perfect preparedness to emergency situations.

Information related to emergency preparedness will be communicated to all relevant workers, contractors and visitors in addition to government authorities and the community when required.

Virgil Gazzola, Vice-Presiden

March 18, 2025

Date

PURPOSE

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

SCOPE

A documented emergency plan will be developed for each company location. Once developed, the scope of the Emergency Plan and requirements (location specific) will be explained to all relevant workers.

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Developing site and location specific Emergency Response Plans for each workplace with the assistance of the Project Managers and the Superintendents.
- 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.
- Co-ordination of all emergency drills including evaluations and corrective actions.

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 are provided, maintained in good condition and used as prescribed.
- The measures and procedures prescribed are carried out in the workplace.

Project Manager Responsibilities:

- 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:

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

PROCEDURE

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

All input from relevant workplace parties regarding emergency response will be considered during the communication of Emergency Response Plans to employees, subcontractors and visitors during Site Orientations.

Gazzola Paving Ltd. will utilize training, orientations and communication with all relevant parties to ensure all personnel are fully aware of the potential emergency situations, the associated steps for response and are able to implement the response measures in a quick and safe manner to achieve the ultimate goal of prevention or minimization of injury or occupational illness.

Emergency Response Plans 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. The Health & Safety Coordinator will be responsible for communicating emergency drills and coordination of emergency drills including evaluation of all emergency drills and any corrective actions required.

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.

Facilities:

The **Health and Safety Coordinator** must do a walkthrough of the facility to identify the required resources and ensure adequate plans are applicable and implemented including ensuring that Emergency equipment must be in place, well-marked and regularly inspected and maintained. This includes at a minimum:

- 1. Appropriate number of fire extinguishers that are:
 - a. Inspected Annually by certified company
 - b. Inspected Monthly by a competent person internally
- 2. First Aid requirements:
 - a. Fully stocked First Aid kit/station with proper supplies
 - b. Qualified First Aider in the vicinity of the Kit/Station on each shift
 - c. Appropriate means for transportation of an injured worker to a medical facility

The above identified resources are the minimum emergency resources required on any work location. Additional resources may be identified by Health & Safety Coordinator during the Walkthrough. Any additional resources identified will be provided and included in the location's emergency response plan.

Site Projects:

The **Project Manager**, **Superintendent** and **Foreman** must undertake a walk through or site review with all location workplace parties to identify the required resources and ensure adequate plan implementation including ensuring that Emergency equipment must be in place, well-marked and regularly inspected and maintained. This includes at a minimum:

- 1. Appropriate number of fire extinguishers that are:
 - a. Inspected Annually by certified company
 - b. Inspected Monthly by a competent person internally
- 2. First Aid requirements:
 - a. Fully stocked First Aid kit/station with proper supplies
 - b. Qualified First Aider in the vicinity of the Kit/Station on each shift
 - c. Appropriate means for transportation of an injured worker to a medical facility

The above identified resources are the minimum emergency resources required on any work location. Additional resources may be identified by the project management/supervision during

the Walkthrough. Any additional resources identified will be provided and included in the location's emergency response plan.

These plans will be documented using the Site-Specific Safety Plan Template and must be available so that in the event of an emergency, all workplace parties are able to respond in an effective manner.

All **Foreman**, **Workers** and **Subcontractors** will receive an explanation and get training on their role in the Emergency Plans during initial or site orientation meetings.

As a minimum, all emergency plans will include;

- Procedures for Emergencies
- Emergency Phone Numbers
- Maps and/or directions to the nearest medical facility

The Emergency Procedure including all response plans will be reviewed at least annually by Senior Management and updated as needed.

DISTRIBUTION

The Emergency Plan distribution must be as follows;

- reviewed with all of our workers and Subcontractors
- posted on Health and Safety board, in the Site Office, or in other strategic areas around site.

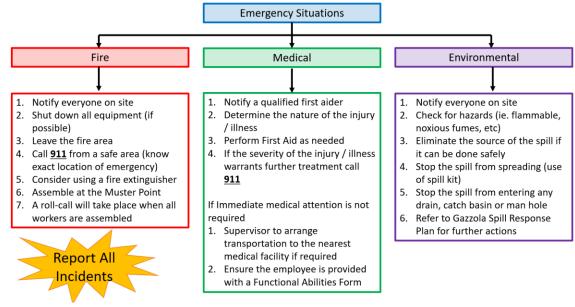
RECORDS

All emergency drills will be documented on the Emergency Response Drill Form with the results of the drills provided to the Project Manager and Health and Safety Coordinator for review.

COMMUNICATION

Emergency response plan and any other relevant information will be communicated to all involved including workers, visitor, and sub-contractors during site orientations. Gazzola Paving Ltd. will communicate with emergency response services, government authorities and the community regarding emergency response as and where required.

EMEGRENCY RESPONSE PLAN TEMPLATE



Site Response (Emergency Communication)

#1 on every list is to notify others.

In the office and shop, the page all function on the internal phone system will be used to notify all staff and visitors as a warning system. Notification to staff and visitors will be undertaken twice. If emergency occurs in the shop or yard, an employee shall be assigned to notify the office reception to ensure that emergency notification is broadcasted over the paging system,.

Additionally, Gazzola Paving has the <u>3-LONG-HONKS</u> warning system in place for the yard and project sites.

- 3-LONG-HONKS means
 - 1. Press the horn for 5 seconds, wait for 3 seconds,
 - 2. press the horn for 5 seconds, wait for 3 seconds,
 - press the horn for 5 seconds
- The 3-LONG-HONKS emergency warning system is not to be confused with the 2-SHORT-HONKS procedure to be done before reversing equipment
- Please do not use 3-LONG-HONKS for anything other than notifying others of an emergency

If you are not on a piece of equipment, you can notify others by using

- Your voice (ex. Yelling for help)
- Your actions (ex. Hand signals indicating for someone or a piece of equipment to stop)
- Your cell phone (ex. Calling 911, Superintendent, Foreman, co-workers, H&S Coordinator, etc.)

Emergencies are something that you need to be prepared for and know how to react to quickly, effectively and safely. Please ask any questions you may have to ensure you are well prepared if an emergency were to occur.

GUIDE TO EMERGENCIES WITHIN FACILITIES

Emergency Pers	<u>sonnel</u>	
Emergency Res	ponse Coordinator (E	ERC):
	Alterr	nate:
Emergency Res	ponse Team (ERT):	
Name	Cell #	Company Name
Grouping Areas		
Area 1		

Types of Emergencies (Potential Emergency Situations in accordance with Gazzola's Workplace Task Standards WTS)

Emergency Evacuation
Fire and Explosion
Medical Emergency
Chemical Spills
Emergency Violence Response
Inclement Weather
Overhead Powerline Contact

EMERGENCY CONTACT LIST

In case of emergency: please contact the first person on the list below. If you are unable to reach that person, leave a message and contact the next person on the list below. Do so until you have spoken to someone and informed them of the emergency situation.

Employee Name	Position/Title	Phone Number

EVACUATION PLAN

In the event of an emergency situation, we require all employees to respond quickly and calmly and evacuate the building to prevent any injuries.

If You Hear the Emergency Alarm:

- Remain calm.
- Turn off the power to your workspace or equipment if safe to do so.
- Leave the area/ building by the nearest, safe exit.
- Close all doors behind as you leave.
- Proceed directly to designated Muster Point
- Advise your Health and Safety Coordinator member at the meeting zone of any observations or status of other employees.
- Remain calm at the meeting zone and await further instructions from your supervisor or ERC/ERT member.

Worker Responsibilities:

- If for any reason the facility must be evacuated, the employees will be advised verbally by their supervisor to evacuate.
- All employees must promptly leave the facility by the nearest safe exit as soon as reasonably practicable.
- All employees will meet at the designated Muster Point for a head count
- Once at the designated Muster Point, all workers must remain there and not reenter the building for any reason.
- Workers will only be allowed to re-enter the building when it has been deemed safe by the emergency responders.
- Follow directions of the ERC/ERT

Supervisors Responsibilities:

- Ensure all workers under your supervision are aware of the requirement to evacuate the building.
- Exit the building through the nearest safe exit point and proceed directly to the designated muster point.
- Assist in a head count and let the ERC/ERT members know that your workers are accounted for or advise of any missing personnel.
- Under no circumstances should anyone go looking for missing workers in the building.
- Provide first aid to injured workers, if trained.
- Follow the directions of the ERC/ERT members or emergency responders.

Emergency Response Coordinator / Team Members (ERC / EMT)

- Call emergency responding personnel (911). The phone numbers are posted on Health and Safety Board or in your Emergency Evacuation Package.
- Exit the building through the nearest safe exit point and go directly to the designated muster point you are responsible for.
- Take a headcount and record all names under the Headcount recording form.
 Communicate with all ERT members and other employees to gather information and confirm head counts.
- ERC will greet the emergency responding personnel when they arrive.
- Provide the emergency responding personnel with specific event information including if any workers are missing or advise the emergency personnel that all are accounted for.
- Take direction from the emergency responding personnel.
- Allow employees to re-enter the building when given the all clear from emergency responding personnel.
- Communicate with other Management personnel to update the status of the Emergency situation.

HEADCOUNT RECORD

ERC/ERC will take a head count and record each workers name on the list below:

Emergency Response Coordinator Name:_____

#	Employee Names	#	Employee Names
1		16	
2		17	
3		18	
4		19	
5		20	
6		21	
7		22	
8		23	
9		24	
10		25	
11		26	
12		27	
13		28	
14		29	
15		30	

FIRE AND EXPLOSIONS

When you hear the emergency alarm, proceed and follow below:

WORKERS

- Initiate evacuation procedure.
- Exit your area through the nearest or alternate emergency exit.
- Close doors behind you.
- Notify the ERC/ERT when you have arrived at the designated muster point.

SUPERVISORS

- Initiate evacuation procedure.
- Notify ERC/ERT in the designated muster point.
- Assist ERC/ERT member in writing a list of evacuated workers at the designated muster point.
- Await further instruction from ERC or emergency responding personnel.

ERC and ERT

- Initiate evacuation procedure.
- Call 9-1-1 (or appropriate number for fire) and report fire.
- Give your name, the company name, address, major intersections, entrance to site, area of site and advice that persons will be available outside for direction. Remain on phone until 9-1-1 operator terminates the call, remain near phone.
- Communicate with ERT members to gather emergency information and determine who may have been in the building. Establish phone calls to those may be unaccounted for.
- Communicate with emergency responding personnel throughout the emergency situation.

MEDICAL EMERGENCIES

WORKERS

- Notify facility First Aid trained personnel and site management team.
- Initiate evacuation procedure if required.
- Assist if possible and safe to do so.

FIRST AIDER

- Assess the scene to determine personal risks or hazards.
- Assess the victim and wear any Personal Protective Equipment (PPE) for personal protection (gloves, mask).
- Take control of the situation and maintain a calm environment.
- Administer first aid if safe to do so.
- Do not move ill or injured person(s), unless it is essential for their safety. Try to make them comfortable.
- Send a worker to notify Facility Management and ERC.
- Direct a worker or the ERC to direct ambulance where the medical emergency is occurring.
- Have someone call 911 if the situation dictates.

For Serious Injury/Illness:

- Notify ERC or facility management as soon as possible.
- ERC or facility management to call 9-1-1 as soon as possible.
- Give your name, the company name, address, major intersections, entrance to site, area of site and advise that persons will be available outside for direction.
 Remain on phone until 9-1-1 operator terminates the call, remain near phone.
- ERC/ERT member to clear immediate area and direct coworkers to safe place and maintain a calm environment.
- ERC to direct ambulance and other emergency responding personnel to location of emergency situation.
- Secure scene for investigation.

HAZARDOUS MATERIALS ACCIDENTS AND SPILLS

Any spill or leak of a chemical must be treated as being a potential hazardous material incident until the chemical can be identified. If the magnitude of the incident is determined to be of serious concern, initiate the evacuation procedures and call 911.

WORKERS AND SUPERVISORS

- Initiate evacuation procedure if required.
- If evacuation procedure are not required, notify ERC or facility management as soon as possible.
- Determine the name of the spilled or leaking chemical or material from the label on the container or from the shipping manifest or invoice.
- Initiate cleanup of material if safe to do so.
- If during the cleanup of the hazardous material, any worker shows signs or symptoms of distress, immediately remove the individual to a safe location and call 911 for further assistance.

ERC/ ERT Members

- ERC/ERT to assess hazards at the scene and establish the magnitude of the incident.
- ERC/ERT to identify hazard (review MSDS, containers, etc.).
- ERC/ERT to initiate evacuation procedures and call Emergency Services (911)

SPILL EMERGENCY PROCEDURE

When projects are prepared for chemical spills, fewer errors are made and there is a reduced risk to persons, property and the environment. The essential elements of spill response preparation are; spill prevention, training, hazard information, PPE and written procedures as described below.

Spill Prevention

- Ensure all hazardous substances are properly labeled.
- Flammable, combustible, toxic or other hazardous materials must be stored in approved containers in designated areas that are protected from weather elements or stormwater and appropriate for the different hazards that they pose.
- Store, dispense, and/or use hazardous substances in a way that prevents spills and/or releases.
- Provide secondary containment when storing hazardous substances in bulk quantities.
- Maintain good housekeeping practices for all hazardous materials.
- Routine/Daily checks in the hazardous substance storage areas.

Training

Spill response training is provided by the Health and Safety Team to Supervisors and workers. All employees will complete WHMIS prior to commencing work and complete annual refresher training.

Hazard Information

Information on the chemical hazards present at the project shall be kept up-to-date and readily available. Sources of information include the SDS, signs, container labels, posters, and reference books. SDS's will be kept on adjacent to hazardous substances at all times, at an easily assessable location.

Workers

- Proceed with caution and advise others that are in the immediate area of the spill of the potential danger.
- If persons are injured, provide first-aid if the scene is secured and you are trained to do so.
- If the spilled chemical has contaminated persons, lead them to the nearest eyewash or emergency shower and assist in washing off the material. However, do not put yourself at risk and become a casualty.
- Notify Supervisor on the site.
- Minor spills or spills of chemicals of low toxicity and/or volatility can be handled by employees at the location.

• If the nature, quantity or location of the spill exceeds the capacity of departmental personnel to deal with it safely and effectively, then outside help shall be requested by contacting the Health and Safety Team.

Spill Clean-up Response

Project Managers are responsible for ensuring that an adequate supply of spill response equipment is maintained at each project location. The Spill Kits will be customized to account for specific hazards and conditions on each location.

The equipment required includes:

- first-aid equipment
- personal protective equipment
- spill cleanup kits and supplies.

Supervisors are responsible for conducting regular inspections to ensure the maintenance and availability of the required equipment on site.

Minor Spill

A minor spill is one that usually presents little or no hazard to person or property and is small enough to be safely cleaned up using the emergency spill kit.

- 1. Notify all personnel and supervisor in the vicinity of spill or any flammable, toxic, volatile material, etc.
- 2. Evacuate and post warnings
- 3. Remove contaminated clothing and enter emergency shower, flush eyes for 15 minutes. Be sure chemical is unreactive with water.
- 4. Obtain information about name of chemical, approximate quantity, hazards of the chemical (review SDS if available)
- 5. If is safe to do perform clean up procedures. If clean up materials are not available call Emergency Services.
- 6. Wear PPE
- Use a spill control material to contain the spill and move it into a container and removed to a temporary storage area off the site area until disposal has been arranged.
- 8. Wash the affected area and PPE with appropriate cleaning solution
- 9. Fill out Incident Report Form

Major Spill

A major spill is one that cannot be contained safely with the materials on the site, threatens safety to life, and/or threatens to enter the sewer system or travel beyond the boundaries of building/property to endanger the environment. The Emergency Services shall be contact.

- 1. Notify all personnel and supervisor
- 2. Post warnings
- 3. Evacuate immediate area
- 4. Call Emergency Services
- 5. State your name, location, chemical(s) involved, and the amount spilled
- 6. Attend to any persons who may have been contaminated. Refer to SDS for first aid information
- 7. Wait in a safe area for the emergency service team
- 8. Do not allow unauthorized person to enter the contaminated area
- 9. Fill out the Incident Report Form

EMERGENCY VIOLENCE RESPONSE

If you observe or are notified of a person(s) in possession of a weapon, forcing entry into the building, or appear to be acting in an extremely aggressive manner, the following steps should be followed:

WORKERS AND SUPERVISORS

- Do not confront the individual.
- Initiate evacuation procedure immediately.
- Call 911 immediately.
- Contact the facility manager/ERC as soon as possible.

ERC/ERT Members

- Do not confront the individual.
- Initiate evacuation procedure immediately.
- Call 911 immediately.
- Inform arriving emergency responding personnel of details known to this point.

INCLEMENT WEATHER EMERGENCY RESPONSE PROCEDURE

Inclement weather shall mean the existence of rain or abnormal climatic conditions (whether they be those of hail, snow, cold, high wind, severe dust storm, extreme high temperature or the like or any combination thereof) by virtue of which it is either not reasonable or not safe for employees exposed thereto to continue working whilst the same prevail. Inclement weather conditions include but are not limited to:

- Tornado
- Wind storm
- Thunder storm and/or lightning
- Snow/ice storm
- Flood

Response to a weather emergency may be based on:

- A warning from a local environmental authority
- Media forecast
- Signs of an upcoming weather emergency

A decision on activating the Inclement Weather Emergency Response Procedure shall be made by the Health and Safety Team and can be based upon the following factors:

- Type of forecast conditions (e.g. wind, snow, ice)
- Severity of forecast condition
- Reliability of the forecast
- Feasibility of continued operation
- Type of work which is taking place
- Traffic and roadway conditions in the surrounding vicinity.

Construction projects shall be secured in response to an inclement weather emergency. Precautionary measures include but are not limited to the following:

- Loose debris shall be tied down and secured
- Electrical equipment shall be covered from exposure to the weather
- Loose tools, material and equipment shall be properly stored and secured
- When material and equipment are covered with tarps; tarps are to be securely tied down
- Scaffolding shall be secured
- Crane operations shall be suspended, and crane equipment shall be secured
- Construction fences and barricades shall be braced and secured.

OVERHEAD POWERLINE CONTACT EMERGENCY RESPONSE PROCEDURE

If your vehicle/machine or you observe that another vehicle/machine made contact with a powerline, the following steps should be followed:

WORKERS AND SUPERVISORS

- Try not to panic, remain calm.
- An attempt should be made to break the contact by driving the vehicle/machine a minimum of 8 meters away from the powerline.

If it is not possible to break the contact:

- 1. Stay in the vehicle/machine until the power has been isolated and the powerlines removed. Don't risk being electrocuted by attempting to leave the vehicle before power is disconnected.
- 2. Advise anyone near the incident site to stay a minimum of 8 meters away from the vehicle and anything else in contact with the powerlines.
- 3. Contact local Electrical Utility immediately to switch off the power and call the emergency services reporting wires down and a life-threatening situation.
- 4. Treat all powerlines as if they are 'live'.

If the person in the vehicle/machine needs to be evacuated:

An emergency evacuation of a vehicle/machine is extremely dangerous and should only be attempted as a last resort, such as if the vehicle is on fire.

Remember never approach the vehicle/machine to assist in an evacuation and always treat all powerlines as if they are 'live'.

- 1. If escape from the vehicle/machine is absolutely necessary, it's critical that you jump clear ensuring that you don't have contact with the vehicle and ground at the same time.
- 2. When you jump, ensure that you land with your feet together and if required, take another one or two jumps with your feet still together, ensuring that you do not touch the vehicle/machine, fall forward or backwards or allow your feet to step apart.
- 3. You must jump/shuffle with your feet together until you are at least 8 meters clear of the vehicle/machine, power lines or anything else in contact with them. Avoid being in line with the side of the tires as they may explode.
- 4. Once clear, do not return to the vehicle for any reason.
- 5. Secure the area and do not let anyone except emergency rescue personnel go near the energized equipment.

EMERGENCY In case of Emergency call - 911 This Site Address is: Project Name: _____ Site Phone: _____ **Local Non Emergency Numbers:** POLICE DEPARTMENT-FIRE DEPARTMENT-**AMBULANCE -MINISTRY OF LABOUR -Other Emergency Contact Numbers: GAZZOLA PAVING LIMITED Utilities:** Hydro -Gas -**Directions to the Nearest Hospital** Hospital Name:

Site Map

PURPOSE

A Fall Prevention Plan for all workers is very important in the prevention of falls from heights in construction. Falls from heights in construction continues to be the leading cause of serious and fatal accidents. Through the use of a Fall Prevention Plan, the Site Management Team can Recognize, Evaluate and Control the causes of falls from heights. Developing Rescue Procedures will ensure prompt response and medical aid to the affected worker.

SCOPE

The Fall Prevention Plan must include a review of suspension trauma, rescue procedures, and methods to alleviate the risk for all workers using Fall Protection Harness systems where any potential fall hazard may exist.

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Ensure that competent trainers are delivering the training to all required workers and supervisors according to site specific Policies and Procedures, and Occupational Health and Safety Act and Regulations.
- Work with management team to define a site specific Fall Prevention Plan and site specific written fall rescue procedure within the Site Specific Safety Plan (SSP).
- Ensure appropriate training and testing is conducted for all required company personnel to ensure thorough understanding of the appropriate procedures and work practices relating to Fall Prevention.
- Maintain Fall Prevention training records at head office.
- 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.
- 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.
- 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:

- Purchase and replace all fall protection equipment 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.

Reviewed Date: March 18, 2025

Superintendent Responsibilities:

- Review Subcontractor documents to ensure all Subcontractors can implement their workplace specific requirements and the site specific expectations under the SSP.
- Ensure that regular inspection of all fall protection equipment is completed and documented by a competent worker.
- 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 potential fall hazards related the work are defined along with the appropriate procedures and required Personal Protective Equipment (PPE) within the site specific SSP.
- Advise all workers and Subcontractors on the risks associated with the assigned work.
- Ensure inspection records on fall protection equipment and devices are kept and maintained.
- Ensure appropriate training records are available on site.
- Ensure that workers are trained to use the equipment and follow the procedures specified for the task in the site specific SSP.
- Ensure that every worker and Subcontractor have the appropriate fall protection equipment including a safety harness, lanyard, shock absorber, rope grab, and self-retracting device for the hazardous or dangerous conditions the worker may be exposed to.
- Check guardrails and covers of floor/roof openings daily to ensure they are installed properly and adequate for the situation.
- Identify appropriate anchor points to be used and configuration of lifelines or other systems.
- Remove all damaged fall protection equipment and/or component from service, and provide appropriate replacements.
- Ensure that a site specific written rescue procedure is in place and known by all the workers and Subcontractors.
- Where so prescribed, maintain existing training records and provide, where required, worker
 with additional written instructions as to the measures and procedures to be taken for
 protection of the worker.

Workers Responsibilities:

- Appropriately use and wear all required protective equipment where required.
- Visually inspect all protective equipment prior to use.
- 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.

Gazzola Paving Limited Revision Date: March 17, 2022 Health and Safety Manual

Page 2 of 11

Reviewed Date: March 18, 2025

PROCEDURE

The **Project Manager** and/or **Superintendent** must ensure that the Fall Prevention Plan is reviewed with all Workers and Subcontractors. This review should be done in conjunction with the Fall Prevention and Working at Heights Training or site orientation.

Prior to the commencement of work by any of our workers or Subcontractors on a project, it will be the responsibility of the **Superintendent** and the **Foreman** to review the Fall Prevention Plan with each of our workers or Subcontractors during our site level orientation or through Safety Talks.

Where site specific needs vary from the Fall Prevention Plan, the Site Management Team (**Superintendent** and the **Foreman**) with the assistance of the **Health and Safety Coordinator** where required must provide ongoing revisions to the plan accordingly to the site specific hazards.

DISTRIBUTION

The Fall Prevention Plan will be distributed to all workers and subcontractors and available on site for review.

RECORDS

Documentation of all Fall Prevention Training and subsequent reviews of the Fall Prevention Plan will be maintained on site and copied to the Project Manager and Health and Safety Coordinator upon completion of training or reviews.

FALL PREVENTION PLAN

All Employees

Typical fall from heights hazards that are encountered by workers in construction include, however are not limited to the following;

- Elevator shaft openings
- Stair well openings
- Perimeter openings
- Roof tops
- Excavation, Trench or Caisson openings
- Work off ladders
- Elevated work platforms
- Etc.

Fall from heights can be eliminated through the use of any of the following control strategies alone and/or in combination with others;

- 1. When possible, implement policies restricting certain types of work that put worker at risk of falling from heights
- 2. Training on Recognition/Evaluation and Control of falls from heights
- 3. Installation of guardrail systems or floor coverings;
- 4. Use of Travel Restraint system;
- 5. Use of Travel Restrict system and
- 6. Use of Fall Arrest systems when necessary

Falls from Heights Plan

Policies for prevention of falls from heights;

- 1. All workers must receive fall prevention training prior to the commencement of work and subsequently reviewed on a yearly basis
- 2. Workers are not allowed to access any unguarded roof areas at any time unless a roof plan has been implemented and the worker has received training on the plan.
- 3. Workers must not enter areas where guardrails or floor coverings around/over floor openings, elevator shafts are not present.
- 4. The installation of guardrails around openings and handrails on stairs will only be completed by trained workers utilizing travel restraint systems when necessary. (This must be done under the direction of the Supervisor)
- 5. Excavation or Trench openings that are not sloped in accordance with the legislative requirements and that a worker could fall into more than 2.4 metres deep shall be protected by an appropriate barrier (Subcontractors responsibility). This will be monitored by the Site Management Team and workers.
- 6. Caissons must be adequately guarded by the Subcontractor. This will be monitored by the Site Management Team and our workers.
- 7. Work off ladders will be limited, however, should a worker be required to work off a ladder, the following must be remembered;

Gazzola Paving Limited Revision Date: March 17, 2022 Health and Safety Manual

Page 4 of 11

Reviewed Date: March 18, 2025

- the ladder must be in safe working condition and must be inspected prior to use;
- the ladder must be secured (top and bottom) (stabilizers can also be used to assist with stabilization)
- the ladder must be of an appropriate length and design for the work. Extension ladders must extend 900 millimetres (3 feet) above the floor or landing
- set the ladder up in accordance with the manufactures instructions and as a minimum for extension ladders a ratio of 1 foot out for every 4 feet up
- three-point contact must be maintained while on the ladder;
- ladders are generally intended for access/egress, therefore work from ladders should only be short in duration
- maintain clean footwear while ascending or descending from a ladder
- never set up ladders near live electrical conductors
- 8. Work off Elevated Work Platforms may be required from time to time. This work will only be performed by trained workers. Fall protection must be used at all times while in powered elevated work platforms.

Travel Restraint and Fall Arrest Components

Travel Restraint, Fall Restrict or Fall Arrest System components may vary in arrangement. All components in the system must be used as per the manufactures instructions and as a minimum, the systems must include the following;

- appropriate anchor points for the type of system in use
- the user must wear a Full Body Harness equipped with a Lanyard (self-retracting lanyard preferred for most applications some exceptions do exist)
- life lines designed for the system (when necessary)
- rope grab or other movement control device (when necessary)
- self locking connecting devices to connect various components of the systems
- material to protect the life line from being cut, chaffed or abraded (when necessary)

Other Fall Protection System Considerations

- understand how the system can be used safely and do not hesitate to ask for assistance from you supervisor.
- only use the system in accordance with the manufactures requirements
- do not expose the equipment to corrosive materials
- do not expose the equipment to sparks or flames
- inspect the system and all of its components prior to each use
- report any defects of the equipment or absence of devices immediately to your supervisor and only proceed if corrective actions have been taken
- if any fall protection equipment has been involved in a fall, it must be immediately taken out of service and sent to the manufacturer for inspection.
- fall arrest systems must be set up in a manner which will not allow the worker to hit an object or the level below.
- only equipment approved by your supervisor may be used in a fall protection system

Gazzola Paving Limited Revision Date: March 17, 2022 Health and Safety Manual

Page 5 of 11 Reviewed Date: March 18, 2025

Good Fall Protection Practices

- always be aware of your surroundings
- never rest up against or push on guardrails
- look where you walk and do not step on floor coverings or other objects that may be on the walking surface as those objects may be hiding a floor opening.
- do not walk backwards when you are on a work surface that may contain a floor opening (quarded or not)
- always report unguarded openings and or unsafe floor coverings to your supervisor immediately
- take time to review the following Fall Rescue Procedures and make notes to suit them to your site conditions
- review the Fall Rescue Plan(s) and make note of the equipment required.

Other Site Specific Notes		

FALL ARREST RESCUE PROCEDURES

PURPOSE

To safely rescue a worker who has fallen and is suspended in a harness and to prevent the fallen worker from the potential serious health effects resulting from prolonged suspension.

AFFECTED PERSONS

These procedures apply to ALL <u>supervisors and employees who are required to utilize Fall Arrest equipment</u> (and/or supervise workers using fall arrest equipment).

POTENTIAL SERIOUS HEALTH EFFECTS OF PROLONGED SUSPENSION

After a worker has been involved in a fall where fall protection devices have deployed and the worker has been suspended, there is potential for "Suspension Trauma/Orthostatic Intolerance". This can be a potentially very serious/grave condition for a worker who remains suspended in a harness for a prolonged period after a fall. The vertical position that a worker remains in (for a period of time) after a fall, can lead to venous pooling of blood in the legs. An incorrectly executed rescue can cause cardiac arrest therefore rescuers must understand the phenomenon of orthostatic intolerance and how to rescue a worker who has been suspended in a harness.

Devices such as relief straps should be utilized to aid in the prevention of Orthostatic Intolerance. Workers can maintain them on their harnesses while using fall protection and this should be considered as the first step in any rescue and the prevention of Orthostatic Intolerance.

IF A WORKER IS OBSERVED SUSPENDED IN A FALL ARREST SYSTEM

- 1. <u>Assess</u> the situation ensure your safety at all times (**Do NoT** attempt a rescue or enter a work area with an unguarded edge without using an appropriate fall protection system). Only trained persons are allowed to conduct rescue operations.
- 2. <u>Obtain assistance</u> alert your supervisor, the rest of the crew and the Constructor or Owner (identify the exact location and the nature of the emergency).
- 3. If the suspended worker is conscious, try to determine the extent of his/her injuries so that the appropriate emergency services personnel can be notified.
- **Call 911-** the supervisor will designate workers to meet emergency services personnel at the entrance to the site.

Note: Time is of the essence, the rescue plan must be initiated immediately to help prevent potential injury to the fallen worker.

OTHER WORKERS MUST:

- 1. Assist as requested by your supervisor or emergency services personnel.
- 2. Stay clear of activities. If you are not involved directly in the rescue, remain at a safe distance from any unprotected edges and from the rescue area so as not to interfere with the rescue operations.
- 3. The status of the affected (injured) worker and further direction will be provided as it becomes available.

<u>OPTION # 1 - FALL ARREST RESCUE</u> - POWERED ELEVATING WORK PLATFORM (PEWP)

<u>Note:</u> Workers will be prevented from exposure to fall hazards when working from the PEWP using a guardrail system and a full body harness with lanyard connected to an appropriate anchor point as defined in the manufacturer's operating instructions.

- 1. If two workers are performing work from the PEWP, lower the platform to ground level so that one worker may dismount from the platform. PEWP are not designed for use by more than two workers at a time.
- Once the PEWP reaches the ground, the worker dismounting from the platform should only disconnect their lanyard from the D-ring on their full body harness. The other end of the lanyard should remain connected to the anchor point in the platform for use by the suspended worker upon rescue. The worker dismounting is responsible to call 911 (if necessary). Where necessary (only one worker using the PEWP) attach another lanyard to the anchor point in the PEWP.
- 3. Raise the platform to a position directly underneath the suspended worker and slowly continue raising the platform until the suspended worker is inside of the guardrails of the platform.
 - Extra caution should be taken if the suspended worker is unconscious. If it is suspected that the worker has sustained head or spinal injuries do not move the injured worker, wait until medical help arrives.
- 4. If the fallen worker is conscious and has not sustained any head or spinal injuries, connect the spare lanyard that is already attached to the anchor point on the PEWP to the d-ring on the back of the suspended worker's full body harness.
- 5. Disconnect the existing self-retracting lifeline or lanyard.
 - **Note:** The shock-absorbing lanyard or self-retracting lifeline that the suspended worker is connected to should not be removed until **after** the suspended worker is safely inside the guardrails of the PEWP.
- 6. Once the original self-retracting lifeline or shock-absorbing lanyard is disconnected, carefully lower the platform to ground level.
- 7. At ground level, administer first aid to the rescued worker, if necessary. Only trained workers are to administer first aid and must have the permission of the rescued worker to do so (if the rescued worker is conscious).
- 8. Secure the incident scene for further investigation.
- 9. Notify Construction Project Manager and the Health and Safety Coordinator immediately for direction and notification requirements.

Pre-Job Review

a.	Is the equipment available	
b.	Is an operator available	☐ Yes ☐ No
C.	Is the equipment in Reasonable Proximity	☐ Yes ☐ No
PEWP R	escue Site Specific Notes	

OPTION # 2 - FALL ARREST RESCUE - USING AN EXTENSION LADDER

Note: Extension ladders of the correct length must be on site and available to perform this type of Lower level rescue (3 Metres or less). This type of rescue will only be performed if a Power Elevated Work Platform is not available.

- 1. Rescue of a suspended worker using an extension ladder should only be performed if the suspended worker is conscious and has not sustained any injuries that would prevent him/her from ascending or descending a ladder.
- 2. Position the extension ladder adjacent to the position of the injured worker with the appropriate ladder set-up.
- 3. Carefully secure the ladder at the top and bottom.
- 4. Instruct the suspended worker to climb onto the ladder.

Vertical Lifeline Fall - lifeline extending to the ground

- 5. Once **three-point contact is established and maintained** on the ladder, the suspended worker will;
 - a) ascend to location of the rope grab on the vertical life line
 - b) slide the rope grab to waist level
 - c) descend 3-4 rungs
 - d) repeat steps b and c until the ground level is reached

Vertical Lifeline Fall – lifeline not extending to the ground

6. Once **three-point contact is established and maintained** on the ladder, the suspended worker will remain on the ladder until emergency services arrive;

Pre-Job Review

1. 2. 3.	Is the equipment available Is an operator available Is the equipment in Reasonable Proximity	☐ Yes ☐ No ☐ Yes ☐ No ☐ Yes ☐ No	
₋adder Re	scue Site Specific Notes		
		·	

Section 11-2 - Fall Prevention Plan

OPTION #3 - FALL ARREST RESCUE ASSISTANCE - ZOOM BOOM FORKLIFT

In the event that a Power Elevating Lifting Device is not available, the following procedure has been prepared to aid in the prevention of Orthostatic Intolerance to a worker suspended in a harness. This procedure isn't intended to be used for raising or lowering the worker, rather simply to provide support until Emergency Services arrive.

<u>CIRCULATION RELIEF – USING AN A PLATFORM</u>

<u>STEP 1</u>

- A. Ideally purchase or build a sturdy platform with guardrails and a means of securing the platform to the carriage of the Zoom Boom Forklift ahead of time and leave on site for Emergency Rescue purposes only.
- B. If A hasn't been done, attempt to locate a platform/cage that can be used for this support function. Secure the platform/cage to the carriage of the Zoom Boom Forklift.
- C. If A & B aren't available, build a sturdy/safe makeshift platform (that can be secured in place) using suitable materials that will help provide support for the worker.

STEP 2

- 1. Zoom Boom Forklift operator to pick up the platform and secure it to the carriage of the Zoom Boom and drive to the desired location.
- 2. The operator will place the machine in "park", apply the hand brake and carefully lift the platform/cage (angled slightly back towards the carriage to prevent the secured platform from slipping) into position below the suspended workers feet.
- 3. The operator will then inch the platform up slowly to allow for the worker to stand on the platform. The suspended worker must remain secured to the fall arrest system at all times.
- 4. Await the assistance of emergency response personnel and follow their instructions.

Pre-Job Review

1.	Is the Sturdy Platform available	☐ Yes ☐ No
2.	Is an Zoom Lift operator available	☐ Yes ☐ No
3.	Is the equipment in Reasonable Proximity	Yes No
Forklift/Zoo	om Lift Relief Site Specific Notes	

POST THIS INFORMATION



GAZZOLA PAVING LIMITED Statistics and Records Policy Statement

Gazzola Paving Limited believes that one of the most important requirements to achieve continual improvement is to regularly monitor and measure Health and Safety performance.

To that purpose, Gazzola Paving Limited will ensure that a system is established to document, maintain and keep records on all Health and Safety information required by the Company's Health and Safety Management System and internal policies and procedures.

Records will include but not limited to:

- 1. Near Miss Reports
- 2. First Aid Treatments
- 3. Accident Investigation Reports
- 4. Regulatory Inspection Reports

Gazzola Paving Limited will analyze the collected records to extract statistical data for all locations where work is being performed. Statistical data collected will be used to identify trends and compare Health and Safety performance of the company with past performance. Statistical data will be measured using qualitative and quantitative measures appropriate to the company's operation while considering leading and lagging performance measures.

Gazzola Paving Limited will record the statistical data along with the analysis and the resulting trends identified on the Annual Report during the annual review process. The annual report including all recorded data will be communicated with all employees during the Annual Refresher Orientation.

Virgi Gazzola, Vice President

March 18, 2025

Date

PURPOSE

Our Health and Safety statistical data must be reviewed on a regular basis and at least annually based on the records generated by all work locations and kept on file at head office location. This will help identify needs and trends to help achieve continuous improvement of our Health and Safety Management System.

SCOPE

Health & Safety records for all work locations will be kept and used for the extraction of statistical data to help in measuring the Health and Safety performance and the comparison with past performance.

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Identify and collect necessary Health and Safety records from all work locations
- Keep copies of the necessary records from all work locations
- Classify and analyze the data from the records in a statistical manner to allow an accurate measurement of the Health & Safety Performance and comparison with past performance
- Schedule and hold Management Health and Safety review meetings to identify trends relating to the records of all necessary Health and Safety Information
- Record and distribute meeting minute's and updates to the appropriate parties as required.
- Create an annual report that will include an analysis of the statistical data extracted from all records all year long from the information reviewed and approved within each management meeting.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Record and communicate the resulting information to the appropriate parties during the Annual Refresher Orientations

Senior Management Responsibilities:

- Direct and participate in the Management Health and Safety review meetings to identify trends relating to the records of all necessary Health and Safety Information
- Ensure regular and on-going monitoring and measuring of Health and Safety Performance and comparison with past performance
- Ensure statistical data is analyzed and trends are identified to measure the Health and Safety performance of the Company on a regular basis and at least annually on the Annual Report
- Review and approve the Annual Report including trends identified from the analysis of statistical data from records
- Ensure the results of the Annual report are recorded and communicated with all relevant workplace parties
- 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;

Reviewed Date: March 18, 2025

Project Manager Responsibilities:

- Participate and provide input when requested with all necessary information and records from work 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:

- Participate and provide input when requested with all necessary information and records from work locations.
- Ensure all required Health and Safety Information are completed and records are kept on site
- Ensure copies of all required records are sent to the Health and Safety Coordinator at the Office
- 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 the superintendent in completing and maintaining all required Health and Safety records on site.
- 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 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:

- 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.

GAZZOLA PAVING LIMITED Revision Date: May 25, 2023 Health and Safety Manual

Page 2 of 5 Reviewed Date: March 18, 2025

PROCEDURE

The Site Superintendent shall complete all Site Health and Safety records as required on the 4S electronic platform.

The Health and Safety Coordinator will classify and analyze the data received to provide a statistical figure of the Health and Safety performance to help identify trends.

This analysis will be provided to Senior Management regularly in the Quarterly Management Meetings for review.

Statistics

Statistics will be used to monitor hazards, reports, incidents, records and the success of the Health and Safety Program. Gazzola will use daily, weekly and monthly reporting to track trends and identify prevention opportunities through the use of Leading and Lagging Indicators.

Leading indicator: is an indicator that signals future events or positive efforts towards preventing injury and illness (e.g. inspections completed, use of safe work practices, etc.). Examples of leading indicators include:

- Number of health and safety training hours by job / risk classification
- Number of workplace Daily, Weekly and Monthly inspections / audits performed in a project/work location
- Number of work orders or accident/incident investigations performed
- Number of "near miss" incidents reported and addressed
- Percentage of immediate closure of OHS inspection / hazard findings
- Percentage of safe behaviours observed in the workplace
- Percentage completion or implementation of planned site OHS programs
- Percentage of personal protective equipment (PPE) compliance
- Number of Safety Meetings Conducted
- Number of Safety Talks, Tailgate Talks performed
- Number of Daily GAZZ Cards completed

Lagging Indicators: measure facts about past events. Examples of lagging indicators include things like:

- Injury frequency and severity
- Near hits (frequency, trend)
- Fatality or other accidents
- Lost workday rate
- Absenteeism
- Chemical spills
- Ministry of Labour orders
- Workers' compensation claims (trends and amounts)

Gazzola Paving Ltd. will monitor and measure its OHS performance using leading and lagging indicators on a regular basis while taking into consideration quantitative and qualitative approaches for both indicators, including.

Leading Indicators	 GAZZ Cards Safe behaviours PPE Compliance Legal Compliance Safety Meetings Tailgate Talks Near Miss Reports 	Quantitative Approach	 Number of inspections completed Number of safety/tailgate talks completed Percentage of Compliance Number of Hazards removed or dealt with Number of training completed Numbers of JHSC meetings and compliance
indicators	 Site Inspections Equipment Inspections Safety Training JHSC meetings 	Qualitative Approach	 Quality of reports Completeness of reports Quality of Training Follow-up on inspections and hazards identified Quality of JHSC recommendations
Lagging	 Injuries & Medical Aid Lost time injuries Fatalities and critical injuries 	Quantitative Approach	 Number of Injuries and reports Number of work refusals Number of MOL orders Number of WSIB claims Number of outstanding items from reports, compliance orders of JHSC meetings
Indicators	injuriesFirst aidMOL OrdersWork RefusalsWSIB claims	Qualitative Approach	 Frequency, trends and types of injuries Quality of corrective and preventive actions identified Immediate closure of Compliance orders Quality of follow-up and completeness of reports and closure of items

Trends may become apparent and proactive prevention methods will be focused on these areas. Gazzola Paving Ltd. will track, analyze, review and trend statistical data for:

- 1. Near Miss incidents
- 2. First aid injuries and treatment records
- 3. Workplace Incidents (Will include various types of events such as work refusals, Violence & Harassment Incidents, Subcontractor incidents, property damage, chemical spills.....etc.)
- 4. Vehicle Accidents
- 5. Hospital/Medical Aid Incidents
- 6. Critical Injuries
- 7. MOL Compliance Orders

This above data analysis will be conducted annually to assess the health and safety performance and to evaluate the effectiveness of the H&S Management System. This information will be included and presented annually in the Company's Annual Report. This data analysis will also be compared to the previous years' data to identify any progress made or decline in performance on the Annual Report.

RECORDS

Supervisors must ensure records of all Health and Safety forms and required information are submitted on the 4S electronic platform for review by the Health and Safety Coordinator at the Office.

All results, records and statistical data extracted will be recorded and presented as part of the Company's Annual Report.

COMMUNICATION

All results, records and statistical data extracted will be recorded and communicated with all employees at least annually during the Annual Refresher Orientations.

GAZZOLA PAVING LIMITED Revision Date: May 25, 2023 Health and Safety Manual

Page 5 of 5 Reviewed Date: March 18, 2025



GAZZOLA PAVING LIMITED Legislation and Other Requirements Policy Statement

Gazzola Paving Limited will identify all legislative requirements applicable to the scope of work including the Occupational Health and Safety Act and all applicable legislations, regulations, standards and guidelines.

It will be the responsibility of Gazzola Paving Limited to maintain compliance with all applicable legislative and other requirements and ensuring that all documentation related to the legislative and other requirements is up to date.

Gazzola Paving Limited will ensure the availability of relevant legislations and all other posting requirements in all work locations visibly posted for all employees.

To that purpose, Gazzola Paving Limited will ensure that a system is established to document, maintain and keep records on all Health and Safety information required by the Company's Health and Safety Management System and internal policies and procedures.

Gazzola Paving Limited will regularly evaluate compliance with all legislative and other requirements that are applicable to the scope of work. The goal of the evaluation is to identify gaps and opportunities for improved compliance.

Virgil Gazzola, Vice-President

March 18, 2025

Date



GAZZOLA PAVING LIMITED Return to Work Policy Statement

The focus of Gazzola Paving Limited is to implement an effective Return to Work Program (RTW) that will ensure the well-being of our most valuable resource, our workers. This RTW program is a temporary measure (in some extreme cases - permanent) that will facilitate a safe and early return to work in the event of a disabling workplace accident and provide every opportunity for injured workers to return to gainful employment.

The primary goal of a RTW plan is a return to the pre-injury job as soon as possible. By comparing the physical demands of the job and the functional abilities, the RTW coordinator, supervisor and the employee can determine if the job needs modifying and if accommodations would be required.

The RTW Program will facilitate a safe and early return to work for workers who have sustained a workplace injury while employed with our company while providing every opportunity for injured workers to return to gainful employment in the event of a disabling workplace accident.

Once an injured worker has been placed on an RTW program, the supervisor for that worker along with the Return-to-Work coordinator will be expected to follow the program with the injured worker and keep Management updated as required.

This Program can only be successful if there is commitment, cooperation and communication between the employer and workers and as necessary the treating physician, health care providers and the Workplace Safety and Insurance Board (WSIB).

Assigning ownership in any RTW Program is vital in achieving desired results. As such, identifying and understanding each party's role and responsibility is the first key.

The RTW Program Coordinator will ensure regular communication exists between Worker, Supervisor and the Health Care Provider.

The Injured Worker will return all completed documentation provided from the health care provider, follow the functional abilities recommendations from the completed third page of the Form 8 and any modified duties provided by the company.

The Health Care Provider will provide medical treatment to an injured worker while adequately completing the Form 8 during the initial visit and provide the completed third page of the Form 8 to the worker. This third page represents the functional abilities information found during the assessment. Every subsequent visit, the physician will complete a functional Abilities Form provided by the injury party.

The WSIB will monitor the progress of the workers return to work and provide assistance if either the employer or the workers have any difficulty or dispute concerning either parties' cooperation with the RTW. Either party could contact the WSIB for assistance. This includes the assistance of a WSIB assigned Return to Work Mediator who will assist both workplace parties in resolving any or all disputes that need to be addressed.

The success of our RTW program is essential to provide every opportunity for injured workers to return to gainful employment and will provide us with the opportunity to accommodate an injured worker and facilitate the goal of returning a worker to his or her pre-injury duties as soon as possible.

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GAZZOLA PAVING LIMITED Workplace Harassment Prevention Policy Statement

Workplace Harassment

Workplace Harassment is defined to mean "engaging in a course of vexatious comment or conduct against a worker in a workplace, including virtually through the use of information and communications technology, that is known or ought reasonably to be known to be unwelcome or sexual harassment". The following examples as cited from the Canadian Human Rights Commission are to be considered 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 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, including virtually through the use of information and communications technology, because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome. In addition, making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

A reasonable action taken by an employer or supervisor relating to the management and direction of its workplace is not considered Workplace Harassment.

Gazzola Paving Limited recognizes the right of workers to work environment free of workplace harassment. Gazzola Paving Limited is 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, application, 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.

Virgil Gazzola, Vice-President

May 28, 2025

Date



GAZZOLA PAVING LIMITED 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.

Gazzola Paving Limited recognizes the right of workers to work environment free of workplace violence. Gazzola Paving Limited strives to provide all employees, suppliers, contractors and visitors with an environment free of Workplace Violence. Mutual respect must be the basis of interaction, cooperation and understanding among all staff and/or contractors. Gazzola Paving Limited 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, application, 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.

Virgil Gazzola, Vice-President

March 18, 2025

Date

PURPOSE

To identify and ensure compliance with the most current versions of all legislative, regulations, standards and other requirements that apply to the scope of operations by Gazzola Paving Limited.

SCOPE

The procedure covers all legislations, regulations, standards, guidelines or any other requirement that may be applicable to the scope of operations of Gazzola Paving Limited.

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Identify all legislations, regulations and other requirements applicable to the scope of operations.
- Monitor compliance and ensure all Health and Safety documentation are up to date with the
 most current version of all legislations, regulations and other requirements applicable to the
 scope of work.
- Advise Senior Management of any changes to the legislations and other requirements and determine the corrective action needed to remain within compliance.
- Conduct an annual evaluation of compliance with all legislations, regulations, standards and any other requirements that apply to the scope of operations.
- Ensure Health & Safety Posting Boards are maintained with appropriate postings in all work locations that are clearly visible.
- 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

Senior Management Responsibilities:

- Ensure the applicable legislations, regulations and other requirements to the scope of operations are identified
- Ensure the Company remains within compliance with the most current and up to date versions of all applicable legislations, regulations, standards and other requirements.
- Review and approve any changes needed to remain in compliance with the most current and up to date versions of all applicable legislations, regulations, standards and other requirements.
- Ensure all company employees receive the appropriate regarding any impacting changes in the Legislations and other requirements.
- 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;

Superintendent Responsibilities:

- Ensure the Health & Safety Posting Board on his/her project is complete with all appropriate postings that are clearly visible.
- Ensure Project compliance with all legislative and other requirements through Site Inspections and correction of any non-compliance identified
- Communicate with all workers any impacting changes in the Legislations and other requirements as required.
- Ensure, where reasonably possible, that every Subcontractor, worker and visitor at the workplace complies with all applicable legislations, regulations and any other requirements including The Occupational Health and Safety Act and Construction Regulations.
- 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 the Health & Safety Posting Board on his/her project is complete with all appropriate postings that are clearly visible.
- Assist the Site Superintendent in Inspections and correction of any non-compliance identified to ensure site compliance with the legislations and all other requirements.
- Ensure, where reasonably possible, that every Subcontractor, worker and visitor at the workplace complies with all applicable legislations, regulations and any other requirements including The Occupational Health and Safety Act and Construction 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:

- Follow and remain in compliance with all applicable legislations, regulations and any other requirements including The Occupational Health and Safety Act and Construction Regulations.
- 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.\

PROCEDURE

Gazzola Paving Limited has identified the following legislations and regulations to be applicable to the scope of Operations:

Ontario Health and Safety Regulations

- The Occupational Health and Safety Act R.S.O. 1990
- Ontario Regulation 213/91 Construction Projects
- Ontario Regulation 851 Industrial Establishments
- Ontario Regulations 297/13 Health and Safety Awareness Training
- Ontario Regulation 420/21 Notices and reports under sections 51 to 53.1 of the Act

Reviewed Date: March 18, 2025

- Ontario Regulations 490/09 Designated Substance
- Ontario Regulation 164/99. Ontario Electrical Safety Code, (Electrical Safety Authority)
- Ontario Regulation 572/99 Training requirements for certain skill sets and trades
- Ontario Regulation 860 –WHMIS Workplace Hazardous
- Ontario Regulation 278/05 Asbestos
- Ontario Regulations 833 -Biological or Chemical Agents, Control of Exposure
- Ontario Regulation 632/05 –Confined Space Regulation
- Ontario Regulation 381/15 Noise
- Ontario Regulation 1101 (WSIB) First Aid Requirements
- WSIA Workplace Safety and Insurance Act
- Smoke Free Ontario Act
- WSIB Regulation 035/08 Return to work

Technical Safety and Standards

- Technical Safety and Standards Act 2000 TSSA
- Canadian Standards Association CSA
- Ontario Regulation 211/01 Propane Storage and Handling
- Ontario Regulation 213/01 Fuel Oil

Employment Standards

Ministry of Labour Employment Standards Act 2000

Environmental

- Environmental Protection Act R.S.O. 1990
- Ontario Regulation 347 General Waste Management
- Ontario Regulation 360 Spills
- Ontario Regulation 361/98 Motor Vehicles
- Canadian Environmental Protection Act
- Ontario Water Resources Act
- Dangerous Goods Transportation Act R.S.O. 1990
- Nuclear Safety and Control Act
- Canadian Net-Zero Emissions Accountability Act

Note: There may also be any additional Municipal or Regional regulations that are applicable to Gazzola Paving Ltd. and information should be sought in each jurisdiction prior to beginning a project.

The Health and Safety Coordinator will be responsible for monitoring any updates to the applicable legislations and regulations applicable the scope of operations using the government websites and publications to ensure compliance with all applicable legislations, regulations and other requirements.

The Health and Safety Coordinator will advise Senior Management of any changes to the Legislations and Regulations that may affect the operations of Gazzola Paving Limited. Assessment of the changes and subsequent actions must be taken to ensure all documentation related to legislation, regulations, standards and any other requirements are in compliance and up to date

GAZZOLA PAVING LIMITED Revision Date: May 25, 2023

Reviewed Date: March 18, 2025

Posted Health & Safety Material

The following postings must be visibly posted on the Health and Safety Posting Boards in all work locations where Gazzola Paving Limited is performing work:

- Health & Safety Policy
- Workplace Violence and Harassment Policy
- JHSC/H&S Representative names and work locations
- Emergency Contact Numbers
- Emergency Procedure/ Plan
- OH&S Act and Regulations for Construction Projects
- OH&S Act and WHMIS Regulations
- Regulation 1101
- Form 82 In Case of Injury
- Health and Safety at Work Prevention Starts Here Poster
- Form 1000
- Map to Nearest Hospital
- First Aid Certified Employees Names and Certificates
- Location of eye wash station
- MOL Orders if any
- Active Work Permits if any
- Other Health & safety related information

Evaluation of Compliance

Evaluation of compliance with all legislations, regulations and other requirements will be done annually after related material has been gathered. The evaluation, in the form of a gap analysis will identify future or immediate changes required or training needs to remain within regulatory compliance. Records of the evaluations of legislative compliance will be kept on the Annual Report.

RECORDS

Records of the evaluations of compliance with the Legislation and other requirements will be recorded and kept as part of the Annual Report..

COMMUNICATION

All information concerning changes to the Legislation and other requirements will be communicated by management and the Joint Health and Safety Committee/Health and Safety Representative on a regular basis. Management and the Joint Health and Safety Committee/Health and Safety Representative will regularly monitor each health and safety bulletin board to ensure all health and safety information is posted and updated.

GAZZOLA PAVING LIMITED Revision Date: May 25, 2023

Section 13-2 - Workplace Violence and Harassment

PURPOSE

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 of workers 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.

SCOPE

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

This program applies to all forms of workplace violence and harassment, including those occurring in person and through virtual means, such as emails, text messages, video conferences, and social media.

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.

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.

Section 13-2 - Workplace Violence and Harassment

Superintendent Responsibilities:

- Conduct a workplace violence assessment as it relates to all workplace locations and the head office.
- Assist in conducting 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:

- Ensure the violence and harassment policy statement, practices, procedures and corporate expectations are met.
- Assist in conducting incident investigations where reports of workplace Violence and or Harassment have been identified.
- Ensure, where reasonably possible, that every Subcontractor, 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.

PROCEDURE

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. An annual review will be conducted to each policy and is to be signed and dated by **Senior Management**, distributed by the **Health and Safety Coordinator** and implemented by all **Superintendent** and each **Foreman**.

Section 13-2 - Workplace Violence and Harassment

Workplace Violence Assessments will be conducted using (13-2-1-1 Form) for developed for all appropriate locations by the **Health and Safety Coordinator**. On the construction sites by the **Superintendent** or competent designate as part of the Pre-Job Construction Activities & Violence Risk Assessment Form. A annual review of these assessments will be conducted to ensure all programs, polices compliance procedures and training is appropriate and maintained.

The **Superintendent** and/or **Foreman** 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.

Failure to comply may result in progressive discipline up to and including termination with cause, 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.

DISTRIBUTION

Distribution of the Workplace Violence and Harassment Prevention Programs, Policies will be as follows:

- 1. Reviewed with new employees during the Orientation Process
- 2. Posted on all Health and Safety Boards and other locations deemed appropriate

RECORDS

All documentation and records associated with workplace violence and harassment prevention will be maintained on file indefinitely.

PURPOSE

The purpose of Workplace Violence Prevention Policy and Program is to ensure that Senior Management, Project Managers, Superintendents, Foreman and Workers, as well as subcontractors understand our policy and their roles and responsibilities as they relate to violence prevention in the workplace. In addition, to ensure that risks of violence to employees are identified and eliminated or minimized through the implementation of prevention programs and/or practices.

DEFINITIONS

Workplace Violence

- the exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker;
- an attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to a worker;
- 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.

Domestic Violence

A situation where a person who has a personal relationship with a worker – such as a spouse or former spouse, current or former intimate partner or a family member may physically harm or attempt or threaten to physically harm that worker at work.

PROCEDURE

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:

1) Risk Assessment

Senior Management will ensure a violence risk assessment is conducted (Refer to Form 13-2-1-1 Workplace Violence Assessment). Any risks identified through this process will result in the development and implementation of a specific violence prevention plan to address this risk. 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

A violence prevention plan will be developed that will include the following elements:

- A written Workplace Violence Prevention Policy Statement
- Strategies to minimize and, to the extent possible, eliminate the risk of violence in the workplace
- Training requirements regarding workplace violence for employees, Foreman, Superintendents and contractors
- Procedures for reporting, documenting and investigating incidents of violence

Note: If domestic violence is deemed to be a potential threat to a specific worker, senior management will undertake the appropriate measures to ensure the dissemination of relevant information to select/affected personnel. Company protocol regarding confidentiality of information will be followed.

2) Incident Reporting, Investigation and Follow-up

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

Senior Management will ensure that all violence incidents are investigated by the appropriate competent designated personnel. Any actions or incidents deemed to be of risk to worker health or well being 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.

GAZZOLA PAVING LIMITED Revision Date: March 16, 2021 Health and Safety Manual

3) Training

<u>General</u>

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

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

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

Specific

Specific training regarding potential workplace violence will be provided to those employees or contractors who are required to work in "high risk" locations as identified through the violence risk assessment process.

Roles and Responsibilities

Senior Management

- Ensure that workplace violence prevention policy statement is prepared, and reviewed on an annual basis with all staff
- Ensure that a office and facility specific violence risk assessment is conducted and if necessary, a violence prevention plan is developed and implemented by the Health and Safety Coordinator.
- Ensure that the workplace violence prevention policy is communicated to all contractors at the workplace
- Ensure that appropriate training and education in violence prevention procedures and response procedures is provided to workers and/or contractor
- Report incident to the Ministry of Labour when required.

Project Manager

- Ensure the reporting, investigating and documenting of incidents of violence are established and are in place
- Conduct a site specific workplace violence assessment and if necessary, prepare a violence prevention plan
- Inform Workers, Foreman and Superintendents of the nature and extent of the risk of violence
- Report incident to Senior Management
- Take corrective actions and monitor their effectiveness
- Ensure regular evaluation of the workplace violence prevention program (annually, after an incident or if circumstances change)
- Ensure that the Health and Safety Coordinator is consulted as part of the violence risk assessment process and during the development of the Violence Prevention Plan

GAZZOLA PAVING LIMITED Revision Date: March 16, 2021

Superintendent Responsibility

- Report incident to police, Ministry of Labour, Project Manager.
- Comply with reporting, investigation and documenting procedures
- Facilitate ongoing discussion on workplace violence issues with workers and contractors, as required
- Provide input into violence risk assessment for construction sites
- Assist in development and updating of the violence prevention plan
- Review procedures for prevention of workplace violence
- Promote and encourage reporting of violent incidents.

Employee/Worker Responsibility

- Provide input into violence risk assessment
- Attend education and training sessions regarding violence
- Provide input into development of the violence prevention plan
- Follow established procedures for the prevention and reporting of incidents of violence
- Report incidents of violence to your immediate Foreman, Superintendent and/or Senior Management
- Provide input into incident investigations

Program Review

The violence program will be monitored and information from investigations, including feedback from workers, Foreman and Superintendents and Senior Management will be used to evaluate its effectiveness. Any weaknesses or opportunities for improvement that are identified through this process will be addressed. Evaluating the program on a regular basis is part of our company's commitment to ensuring a safety and healthy workplace.

GAZZOLA PAVING LIMITED Revision Date: March 16, 2021

Review Date: March 18, 2025

FORM 13-2-1-1 - Workplace Violence Assessment/Control Measures

Company Name: Name:	
Workplace Location: Date:	
Describe responses to any of the following questions to indicate poten to be examined closely to address potential areas of workplace violence	
Is there a company history of incidents or threats of violence in the workplace	ce? YES
Comments:	
Is workplace near an area that has a historically high crime?	☐YES ☐NO
Comments:	
Have any workers or the JHSC raised concerns respecting potential or actual in the workplace in the last 5 years?	violence YES NO
Comments:	
Are workers requested or required to work alone or in isolation within the workplace?	☐YES ☐NO
Comments:	
Is there a need for workers to work during late evening or early morning hou themselves?	urs by YES NO
Comments:	
Do workers have contact with the public?	☐YES ☐NO
Comments:	
Is access to the workplace controlled? (EX. at reception, coded cards, or keys	yes No
Comments:	
Is there a means of summoning immediate assistance in work areas should workplace violence occur?	☐YES ☐NO
Comments:	

GAZZOLA PAVING LIMITED Revision Date: March 16, 2021

FORM 13-2-1-1 - Workplace Violence Assessment/Control Measures

Is there a means of summoning assistance within the workplace? (EX, paging system,	YES
emergency call button, phones)	NO
Comments:	
Is there security system in place and is it maintained? (EX. Security cameras,	YES
monitoring, guards, etc.)?	□NO
Comments:	
Are there posted emergency response plan with floor plans showing exits,	YES
entrances, location of emergency equipment?	NO
Comments:	
Is the workplace designed in a manner that eliminates places to hide, enhances	YES
visual surveillance, and/ or lighting?	□NO
Comments:	
Have the violence & harassment policies been posted within the workplace?	YES
·	□NO
Comments:	
Is there sufficient lighting inside and/or outside of the workplace?	YES
	□no
Comments:	
Are additional workplace locks used to secure working locations?	YES
·	□NO
Comments:	
Are locks used and are they fully functional?	YES
	□NO
Comments:	

Section 13-2-2 - Workplace Harassment Prevention Program

PURPOSE

The purpose of the Workplace Harassment Prevention Policy and Program is to ensure that Senior Management, Project Managers, Superintendents, Foreman and Workers, as well as subcontractors, understand our Policy and their roles and responsibilities as they relate to harassment prevention in the workplace. In addition, to ensure that risks of harassment to employees are identified and eliminated or minimized through the implementation of prevention programs and/or practices.

DEFINITIONS

Workplace Harassment

Workplace harassment is defined to mean "engaging in a course of vexatious comment or conduct against a worker in a workplace, including virtually through the use of information and communications technology, that is known or ought reasonably to be known to be unwelcome or sexual harassment". 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 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, including virtually through the use of information and communications technology, because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome. In addition, making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome. A reasonable action taken by an employer or relating to the management and direction of its workplace is not considered workplace harassment.

PROCEDURE

This policy provides the framework for the development of procedures and programs for the promotion of a respectful environment and a process for the prevention of workplace harassment. To this end, the following process will be conducted as part of our company Workplace Harassment Prevention Program:

1) Training

General

During employee orientations and safety talks the following items will be reviewed:

- Company Workplace Harassment Prevention Policy
- Our expectations of conduct while engaging in work activities
- Workplace Harassment prevention procedures and corrective response procedures

Section 13-2-2 - Workplace Harassment Prevention Program

All contractors will be advised of our company policies regarding Workplace Harassment Prevention during site orientations and/or safety meetings.

2) Incident Reporting, Investigation and Follow-up

Workers are required to report harassment arising out of their employment, to their respective Foreman, Superintendent, Senior Management or Health and Safety Coordinator.

Senior Management will ensure that all harassment incidents are investigated by the appropriate parties. Any actions or incidents deemed to be harassment will be dealt with following progressive disciplinary measures. This process will be documented and kept on file. In addition, local authorities will be summoned as required.

Results of the Investigation

Within 10 days of the investigation being completed (and in the absence of extenuating circumstances), the worker who allegedly experienced the workplace harassment and the alleged harasser, if he or she is a worker of the employer, will be informed in writing of the results of the investigation and any corrective action taken or that will be taken by the employer to address workplace harassment.

Confidentiality

Information about complaints and incidents shall be kept confidential to the extent possible. Information obtained about an incident or complaint of workplace harassment, including identifying information about any individuals involved, will not be disclosed unless disclosure is necessary to protect workers, to investigate the complaint or incident, to take corrective action or otherwise as required by law.

While the investigation is on-going, the worker who has allegedly experienced harassment, the alleged harasser(s) and any witnesses should not discuss the incident or complaint or the investigation with each other or other workers or witnesses unless necessary to obtain advice about their rights. The investigator may discuss the investigation and disclose the incident or complaint-related information only as necessary to conduct the investigation.

All records of the investigation will be kept confidential.

ROLES AND RESPONSIBILITIES

Health and Safety Coordinator Responsibilities

- Ensure the reporting, investigating and documenting of incidents of workplace harassment are established and are in place.
- Take corrective actions and monitor their effectiveness
- Ensure regular evaluation of the Workplace Harassment Prevention Policy (annually, after an incident or if circumstances change)
- Ensure appropriate training and education in harassment prevention procedures and response procedures is provided to workers and/or contractors

Section 13-2-2 - Workplace Harassment Prevention Program

Senior Management Responsibilities

 Ensure that the Workplace Harassment Prevention Policy Statement is prepared and reviewed on an annual basis with all staff

Project Manager Responsibilities

- Ensure that the Workplace Harassment Prevention Policy is communicated to all contractors
- Inform Workers, Foreman and Superintendents of the nature and extent of workplace harassment
- Ensure that the worksite Superintendent is consulted during the development of the Workplace Harassment Prevention Policy

Superintendent/Foreman Responsibilities

- Facilitate ongoing discussion on workplace harassment issues with workers and contractors
- Provide input into the workplace harassment policy
- Review procedures for prevention of workplace harassment
- Promote and encourage reporting of incidents of harassment
- Comply with reporting, investigation and documenting procedures

Worker Responsibilities

- Provide input into workplace harassment policy
- Attend education and training sessions regarding workplace harassment
- Follow established procedures for the prevention and reporting of incidents of workplace harassment
- Report incidents of harassment to your immediate Foreman, Superintendent and / or Senior Management
- Provide input into harassment investigations

PROGRAM REVIEW

The harassment program will be monitored and information from investigations, feedback from Workers, Foreman, Superintendents and Senior Management will be used to evaluate its effectiveness. Any weaknesses or opportunities for improvement that are identified through this process will be addressed. Evaluating the program on a regular basis is part of our company's commitment to ensuring a safety and healthy workplace.

GAZZOLA PAVING LIMITED Revision Date: May 28, 2025

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.

SCOPE

Provisions for first-aid are a legislative requirement under Regulation 1101 and the Workplace Safety Insurance Act (WSIA).

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.

Section 13-3 - First Aid

- 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 Log.
- Apply First Aid if trained to do so.
- 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 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.

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.

The company will ensure a first aid trained employee is available on all shifts, and ensure that first aid certified employees maintain a current first aid certificate. First Aid certification shall include First Aid, CPR and AED training. The certificates of the first aid trained employees will be posted at Health and Safety board. First Aid providers shall renew their certifications prior to expiry, the Health and Safety Coordinator will maintain and re-certify the first aid personnel based on the Training Matrix.

The requirements for first-aid kits will be determined for the office, and site personnel. When and where necessary first-aid kits will include Automated External Defibrillators (AED). Annually all 16-200 First Aid Kits shall be inspected by the Health & Safety Coordinator. Health & Safety Coordinator shall keep an inventory of AED units and follow manufactures requirements for the inspection and maintenance of all AED units. AED units will be inspected at minimum annually.

All first aid Kits will be equipped with a First Aid Kit Inspection Checklist (13-3-2 - Form), a First-Aid Manual and a First-Aid Log (13-3-1- Form).

Section 13-3 - First Aid

Each First Aid Kit Inspection shall be inspected by the **Superintendent** and/or **Foreman** using Checklist **(13-3-2- Form)** on a Quarterly basis.

All workplace parties 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 First-Aid Log (13-3-1 - Form).

DISTRIBUTION

The following First-Aid documents will be available near and/or in the First Aid Kits or Health and Safety Boards within the workplace as required;

- Certificates of First-Aid Trained Personnel
- Regulation 1101,
- Form 82,
- First Aid Kit Inspection Checklist,
- First Aid Log
- Emergency Phone Numbers & directions to the nearest clinic and hospital

RECORDS

Regulation 1101 of the WSIA requires a Log of First Aid Injuries be maintained each time an injured worker receives First-Aid. First-Aid kits will be equipped with Injury Log sheets and First-Aiders will be required to complete the log entries each time they administer First-Aid.

All first aid treatment logbooks will contain the following information:

- Date of the injury
- Time of injury
- Names and work locations of witnesses
- Exact location of the treatment given



13-3-1 Form - First Aid Treatment Log

Name	Date	Time	Accident Description	Witness	Description of Injury (Nature + Body Part)	Supplies Used	Time of First Aid
John Doe	July 11, 2016	3:20 am	Cut finger on sharp edge of a wooden form.	Jane Doe	Cut on Left Index Finger	1 Roller Bandage	3:22 am
		am					am
		pm					pm
		am					am
		pm					pm
		am					am
		pm					pm
		am					am
		pm					pm
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		pm					pm

Revision Date: March 16, 2021 Review Date: March 18, 2025



Form 13-3-1 - First Aid Treatment Log

Name	Date	Time	Accident Description	Witness	Description of Injury (Nature + Body Part)	Supplies Used	Time of First Aid
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		pm					pm
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		am					am
		pm					pm

Revision Date: March 16, 2021 Review Date: March 18, 2025



Items	16-200 Workers
* Inspection Card for First Aid Kit	✓
** Manual	✓
*** First Aid Log Book	✓
Safety Pins	24
Basin	1
Individually Wrapped Adhesive Dressings	48
Adhesive Tape, 1 Inch wide	2 Rolls
1-Inch Gauze Bandage	12 Rolls
Sterile Gauze Pads, 3 Inches Square	48
Gauze Bandage, 2 Inches Wide	8 Rolls
Gauze Bandage, 4 Inches	8 Rolls
Sterile surgical pads, individually wrapped	6
Triangular Bandage	12
Splint Padding	2 Rolls
Splint(s)	Assorted Sizes
Stretcher	1
Blanket	2
Non-Latex Gloves in varying sizes	✓
CPR Mask (barrier device)	✓

Note: Medications and ointments should not be in first aid kits. Equipment outside of the scope of first aiders should not be in first aid kits.



Notes:



- * Inspection Card (date and signature for quarterly inspections)
- ** Current edition of standard St. John Ambulance First Aid Manual
- *** First Aid Log Book: In the case of an accident, record (at minimum):
 - Circumstances of the accident described by the injured worker
 - Date and time of the accident
 - Names of witnesses

Date:

- Nature and exact location of the injuries to the worker
- Date, time and nature of each first aid treatment given

Initial.

Date.	 <u>110 (65)</u>

(Inspect the First Aid Kit every 3 Months. Date and sign the form. If the seal is broken, the First Aid Kit needs to be restocked.)

PURPOSE

We are committed to the protection of our employees from the harmful effects of hazardous workplace material. We must ensure that an appropriate, established and maintained Workplace Hazardous Materials Information System (WHMIS) is in place at all company locations. In addition, our Subcontractors must ensure a WHMIS Program is maintained and available on site.

SCOPE

Once a hazardous material has entered the workplace, the WHMIS Program will control exposure to these materials through a combination of assessments, training, labeling, Safety Data Sheets (SDS) and maintenance of the Program.

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Review on a regular basis or at least annually, the information and training regarding chemicals, controlled and hazardous materials, instruction and training provided to the employees.
- Ensure all required SDSs are provided and documented from the manufacturer of the hazardous products.
- Establish methods to ensure the responsibilities in the purchase, storage, handling and dispose of WHMIS-controlled products.
- Ensure that training courses are of a duration that permits all training objectives / topics to be adequately covered.
- 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.
- 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 that all hazardous chemicals, controlled products and waste materials stored, transported or disposed of by company personnel, are identified and labeled in accordance with applicable legislation.
- Ensure that the SDS binder are available to the employees and are current.
- Assist Supervisor and the Health and Safety Coordinator in scheduling the employee training and courses.
- Ensure all employees who may use workplace chemical, controlled products or handling hazardous waste materials have been trained in hazard recognition, safe handling, storage, transportation, and / or disposal procedures as may be required.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Superintendent Responsibilities:

- Make readily available to employees exposed information regarding hazardous materials by providing Safety Data Sheet (SDS) for all work locations where chemicals, controlled products and / or hazardous waste materials are handled, stored or transported.
- Ensure that all hazardous chemicals, controlled products and waste materials stored, transported or disposed of by company personnel, are identified and labeled in accordance with applicable legislation.
- Ensure that the SDS binder are available to the employees and are current.
- Ensure that all hazardous chemicals, controlled products and waste materials stored, transported or disposed of by company personnel, are identified and labeled in accordance with applicable legislation
- Take every precaution reasonable in the circumstances for the protection of a worker.

Foreman Responsibilities:

- Advise employees of the location of SDSs for WHMIS chemical materials and controlled products.
- Advise employees (who may be exposed to WHMIS chemical materials and / or controlled products) of the hazards associated with the products used in their workplace.
- Ensure that the SDS binder is available to the employees and are current. SDSs are prepared by the manufacturer of the controlled product.
- 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.
- Ensure that all hazardous chemicals, controlled products and waste materials stored, transported or disposed of by company personnel, are identified and labeled in accordance with applicable legislation
- Take every precaution reasonable in the circumstances for the protection of a worker.

Workers Responsibilities:

- Attend and participate in education and WHMIS training programs on chemical materials and / or controlled products as required.
- Use WHMIS-related information and training to protect health and safety on the job, by taking all necessary steps to protect themselves and their co-workers.
- Bring to the attention of their supervisory any concerns about controlled products (e.g. damaged labels, outdated SDSs, defective personal protective equipment (PPE), health and safety concerns associated with controlled product use).
- 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.

PROCEDURE

The Workplace Hazardous Material Information System will be developed/ maintained by the **Health and Safety Coordinator** with the assistance of the **Superintendent** and **Foreman** where required.

The program will include the following topics:

- Part 1: Training
- Part 2: Safety Data Sheets
- Part 3: Labeling

DISTRIBUTION

Prior to training, the requirements for each of the Program elements will be distributed and reviewed with:

- Supervisors
- Health and Safety Coordinator

All workers and Subcontractor's workers will be able to review this program at any time.

RECORDS

All training of employees will be documented and retained on file by the **Health and Safety**Coordinator for a period of five years.

Part 1: TRAINING OF EMPLOYEES

This segment of the Workplace Hazardous Material Information System will include the following topics to be considered when determining employee training:

- 1. Legislative Requirements
- 2. Target Groups
- Company Specific Training
 - Training Considerations
 - Generic Training
 - Specific Training

1. LEGISLATIVE REQUIREMENTS

Gazzola Paving Limited will arrange for the delivery of generic and job specific training for all employees. Worker training must be designed to provide the knowledge needed to exercise the workers' "Right to Know" about the hazardous materials handled, stored or used in the workplace.

The means for delivery of the training must be planned and delivered in consultation with the Joint Health and Safety Committee (if applicable).

Updates and Reviews

The effectiveness of the WHMIS Program is to be assessed annually. The following will be a guideline to use when developing strategies for the training of employees.

2. TARGET GROUPS

Develop a "Needs Analysis", considering the following:

- 1. Toxicity of chemical agents used by workers,
- 2. Likelihood of exposure to physical or chemical agents (work with or in proximity)
- 3. Common exposure to physical or chemical agents
- 4. Learning abilities (e.g. language barriers)

Define the target groups, based on the considerations listed above. These target groups will be submitted to the **Health and Safety Coordinator**.

3. COMPANY SPECIFIC TRAINING

Training Considerations

Determine the training requirements for each group to be trained and ensure that the training is performance oriented.

GAZZOLA PAVING LIMITED Revision Date: March 17, 2022

Date: March 17, 2022

Generic Training

All training sessions as a minimum will cover the following:

- WHMIS Legislation
- Worker Education
- Labels
- Safety Data Sheets
- Emergency Procedures

Specific Training

The specific training needs will include the review of the chemical's hazardous properties and recent results from workplace health and safety monitoring and health and safety inspection findings.

The training must include a review of Safety Data Sheets in use by the target groups and participants should gain an understanding of how to protect themselves and their co-workers when handling, storing or using potentially hazardous products as well as steps to be taken in the event of an emergency.

A review should also be made on the administrative controls, engineering controls in place and/ or the Personal Protective Equipment to be used. If Personal Protective Equipment is to be used, the trainer must explain the limitations, fit, use and care of the equipment.

Training Schedule

A training schedule will be arranged by the **Health and Safety Coordinator**.

WHMIS Training must be conducted initially for all employees and reviewed at least annually. WHMIS training shall be done annually using the electronic training platform and will include a knowledge test.

Part 2: SAFETY DATA SHEETS

PURPOSE

Safety Data Sheets (SDS) are provided by the manufacturers/ suppliers of controlled products, which are used in the workplace. SDS will be available for review by all of our workers and Subcontractor's workers.

Safety Data Sheets are designed to provide the user with valuable health and safety information on the product that is being stored, handled or used. The worker's ability to use this information will be instrumental in the safe use of the product. SDS also provide valuable information on first-aid measures to be taken if a worker is adversely affected by a hazardous product.

PROCEDURE

The **Health and Safety Coordinator**, **Superintendents** and/or **Foreman** will determine procedures for obtaining the SDS from suppliers as well as Subcontractors and reviewing the content of the SDS and ensuring that appropriate control measures have been taken for the safe use, storage and handling of the product. The requirements for Safety Data Sheets will address the following topics:

- Legislative requirements
- Review of contents
- Ensuring adequate control measures for the product
- Training workers on use of SDS
- Maintaining current SDS
- Yearly review of SDS
- Location of SDS

DISTRIBUTION

SDS are maintained and available via the online database, which can be accessed by scanning the SDS QR-code and **Foremen / Superintendents** have access on their phones or if available tablets.



Gazzola Paving

Scan to access an

All master list of SDS will be maintained in the WHMIS binders including the QR code for access to the listed SDS's.

RECORDS

The records to be maintained for the SDS's include any correspondence to suppliers, requesting SDS, etc.

Part 3: LABELING

PURPOSE

WHMIS legislation clearly defines the labeling requirements for controlled products brought into and used in the workplace. Labeling of controlled products is done in one of two manners, through Supplier Labels and/ or Workplace Labels.

PROCEDURE

The **Health and Safety Coordinator** will define the labeling requirements for all controlled products in the workplace. The labeling requirements must make provisions for the following;

- Requirements for Supplier Labels
- Requirements for Workplace Labels
- Receiving Hazardous / Controlled Products

Supplier Labels - must be provided and/or affixed to containers of controlled products by the supplier / manufacturer. These labels provide valuable health and safety information to the people handling/ storing or using the product and they also alert the user that the product is considered a potentially hazardous product.

Affixed supplier labeling for controlled products in approved storage containers or transferred controlled products into other containers in the workplace must be adequately identified through the use of labels and communicated to workers. It is very important for our employees to be aware of and understand applicable labeling requirements for these types of controlled products.

Workplace Labels - when controlled products are decanted from their original / primary containers into new / secondary containers, Workplace Labels must be affixed to or written onto these new containers.

DISTRIBUTION

The specific requirements for labeling will be reviewed during the training sessions with all employees.

RECORDS

Labeling requirements will be maintained in the WHMIS Binders.

PURPOSE

The Return to Work (RTW) Program will facilitate a safe and early return to work for Workers who have sustained a workplace injury while employed with our company.

SCOPE

The RTW program will provide every opportunity for injured Workers to return to gainful employment in the event of a disabling workplace accident.

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Develop / offering suitable Modified Work.
- Communicate with the WSIB relating to the RTW 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 RTW program 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.
- Assist Project Manager 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.

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 RTW Program diligently.
- Obtain Functional Abilities information at each Health Care Practitioner's visit related to the work-related injury.
- Provide all RTW 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.

PROCEDURE

Once an injured Worker has been placed on an RTW program, the **Superintendent** for that Worker, with assistance from the **Health and Safety Coordinator**, will be expected to follow the program with the injured worker by documenting temporary modified work / worker's progress report and keep **Senior Management** updated as required.

The RTW program will be broken into two stages;

- 1. To prevent Workers from losing time due to workplace injuries through prompt medical treatment (use of the WSIB Functional Abilities Form) and adherence to the Workplace Safety and Insurance Act (WSIA).
- 2. To return Workers to gainful employment as soon as medically authorized. This will be done on potentially two levels;
 - a) Temporary Modified Work
 - b) Permanently Modified Work

DISTRIBUTION

The entire workforce must also be made aware of the RTW program during worker Orientations.

RECORDS

Worker records generated through the RTW program must be maintained indefinitely.

Return to Work (RTW) Program

The purpose of having an RTW program is to provide workers who have been injured on the job, a safe means for returning to gainful employment in an expedient manner while ensuring that "Lost Time" is kept to an absolute minimum.

Re-employment obligations and the financial impact of experience rating implemented by the Workplace Safety and Insurance Board have put the onus on the Employer to return injured Workers to the workplace as soon as possible. As per the Workplace Safety and Insurance Act, 1997, s. 40 (See below). All employers are required to have a Return to Work program.

PART V RETURN TO WORK

Duty to co-operate in return to work

- **40.** (1) The employer of an injured worker shall co-operate in the early and safe return to work of the worker by,
 - (a) contacting the worker as soon as possible after the injury occurs and maintaining communication throughout the period of the worker's recovery and impairment;
 - (b) attempting to provide suitable employment that is available and consistent with the worker's functional abilities and that, when possible, restores the worker's pre-injury earnings;
 - (c) giving the Board such information as the Board may request concerning the worker's return to work; and
 - (d) doing such other things as may be prescribed. 1997, c. 16, Sched. A, s. 40 (1).

Same, worker

- (2) The worker shall co-operate in his or her early and safe return to work by,
 - (a) contacting his or her employer as soon as possible after the injury occurs and maintaining communication throughout the period of the worker's recovery and impairment;
 - (b) assisting the employer, as may be required or requested, to identify suitable employment that is available and consistent with the worker's functional abilities and that, when possible, restores his or her pre-injury earnings;
 - (c) giving the Board such information as the Board may request concerning the worker's return to work; and
 - (d) doing such other things as may be prescribed. 1997, c. 16, Sched. A, s. 40 (2).

Same, construction industry

(3) Employers engaged primarily in construction and workers who perform construction work shall co-operate in a worker's early and safe return to work and shall do so in accordance with such requirements as may be prescribed. Subsections (1) and (2) do not apply with respect to those employers and workers. 1997, c. 16, Sched. A, s. 40 (3).

1.0 PURPOSE/INTRODUCTION

Return to Work Programs became mandatory effective January 1, 1998 as a result of Bill 99. Employers and their workers are required to work cooperatively and communicate in the facilitation of the worker's return to work. The failure of any workplace party (employers or workers) to comply with these initiatives could result in penalties by the Board, as a provincial offence, under the WSIA.

The focus of an effective Return to Work Program (RTW) is the well being of our most valuable resource, our workers. This program is a temporary measure (in some extreme cases - permanent) that will facilitate a safe and early return to work in the event of a disabling workplace accident and provide every opportunity for injured workers to return to gainful employment.

This Program can only be successful if there is commitment, cooperation and communication between the employer and workers and as necessary the treating physician, health care providers and the WSIB.

Return to Work Goal Setting:

The primary goal of a return to work plan is a return to the pre-injury job as soon as possible. By comparing the physical demands of the job and the functional abilities, the Health and Safety coordinator, supervisor and the employee can determine if the job needs modifying and if accommodations would be required.

If the employee is not able to return to their pre-injury position, the Health and Safety coordinator and supervisor will attempt to accommodate the worker as soon as possible. The accommodation should be suitable and restore the employee's earnings. The employer will make every effort to provide meaningful modified work. The Health and Safety coordinator and supervisor will use the following hierarchy as a guideline to return to work plan development:

- 1. Pre-injury job (starting point and overall goal)
- 2. Pre-injury job, accommodate to meet the workers abilities.
- 3. Work comparable in nature and earnings to the pre-injury job (with accommodation if required)
- 4. Alternate suitable work (with accommodation if required)

2.0 REPORTING REQUIREMENTS TO WSIB

Under Section 21(1) of the WSIA, an employer shall notify the Board within three days after learning of an accident to a worker employed by him/ her or if the accident necessitates health care or results in the worker not being able to earn full wages. As well, an employer shall give a copy of the Form '7' to the worker at the time the notice is given to the WSIB. Equally, the worker shall give a copy of his or her claim to his or her employer at the time the claim is given to the Board.

Under Section 21(3) of the WSIA an employer who fails to comply with this section shall pay the prescribed amount to the Board under Act. Under Section 157, if a corporation commits an offence under this Act, every director or officer of the corporation who knowingly authorized, permitted or acquiesced in the commission of the offence is guilty of an offence, whether or not the corporation has been prosecuted or convicted.

Wage Changes – Under the WSIA a change in a worker's wage or condition constitutes a material change that affects a person's entitlement to benefits and services under the Act. Any change in wages must be reported to the WSIB within 10 days of the change.

Changes in Modified Work Duties/ Duration of Program

As is necessary, the modified work duties as performed by the worker shall be monitored or adjusted, to ensure progress or difficulties being encountered by the worker are being addressed.

All change in duties must be documented on the worker contact log and medically authorized by the treating physician. As well, all change in duties should be reviewed and approved by the JHSC/ Modified Work Committee and explained to the worker, the Supervisor and others involved in the RTW Program.

Failure to Cooperate

If the WSIB determines that an employer is not co-operating in RTW activities, the employer will be notified by the WSIB regarding their obligation to co-operate in RTW activities and finding of non-co-operation.

If the WSIB determines that a worker is not co-operating in RTW activities, the decision-maker notifies the worker of the obligation to co-operate in RTW activities, and consequences of this finding (i.e., reduction or suspension of benefits).

Return to Regular Pre-Accident Work Duties/ End of RTW Program

All injured workers should obtain medical clearance from their treating physician, via a Functional Abilities Form or note from the treating physician, prior to resuming his or her pre-accident duties. The WSIB must also be advised of this change.

3.0 ROLES AND RESPONSIBILITIES

Assigning ownership in any Return to Work Program is vital in achieving desired results. As such, identifying and understanding each party's role and responsibility is the first key.

The role of the Health and Safety Coordinator is to ensure regular communication exists between Worker, Project Manager and the Health Care Provider. Under the return to work obligations Part V Section 40, (Subsection 1) of WSIA the employer of the injured worker shall cooperate in the return to work program by:

- contacting the worker as soon as possible after the injury occurs and document ongoing communication using the workers contact log throughout the period of the worker's impairment and recovery,
- providing suitable employment that is available and consistent with the worker's functional abilities and that, when possible, restores the worker's pre-injury earnings,
- giving the Board such information as the Board may request concerning the worker's return to work and doing such things as may be prescribed.

Independent medical assessments: Where there are discrepancies or differences in opinions around the employee's prognosis or functional abilities, the employer may request that an independent medical assessment be completed in an attempt to resolve the issue.

The role of the Injured Worker when filing a claim, a worker must consent to the disclosure to his or her employer of information provided by a health professional under subsection 37(3) concerning the worker's functional abilities. The disclosure is for the sole purpose of facilitating the worker's return to work.

Under the return to work obligations Part V Section 40, (Subsection 2) of the WSIA the worker shall cooperate in his or her return to work by:

- contacting his or her employer as soon as possible after the injury occurs and maintain communication throughout the period of the worker's impairment and recovery,
- assisting the employer, as may be required or requested, to identify suitable employment that is available and consistent with the worker's functional abilities and that, when possible restores his or her pre-injury earnings,
- giving the Board such information as the Board may request concerning the workers return to work; and
- doing such things as may be prescribed.

The role of the Health Care Provider is to provide medical treatment to an injured worker. The health care provider shall complete a Form 8 during the initial visit and provide the completed third page of the Form 8 to the worker. This third page represents the functional abilities information found during the assessment. Every subsequent visit, the physician will complete a functional Abilities Form provided by the injury party.

The role of the WSIB is to monitor the progress of the workers return to work and provide assistance if either the employer or the workers have any difficulty or dispute concerning either parties' cooperation with the RTW. Under Section 40(6) of the WSIA, either party could contact the WSIB for assistance. This includes the assistance of a WSIB assigned Return to Work Mediator who will assist both workplace parties in resolving any or all disputes that need to be addressed.

4.0 SUPERVISOR'S DUTIES

Experience dictates that the supervisors play an integral role from the time of the accident to the injured worker's return to work. As such, the following guidelines are to clarify the supervisor's roles and responsibilities. To ensure that accidents are properly documented and minimize the need for lost time assist, an injury management package was created for all supervisors that provides the necessary paperwork to be completed.

Injury Management Package Includes:

- Attending to An Injured Employee
- Letter to the Health Care Provider
- Form 8
- Functional Abilities Form
- Accident Investigation Form
- Letter to the Employee Offering Modified Job Duties
- Worker's Return to Work Progress Report

- Provide prompt medical treatment by arranging transportation for the injured worker and accompany or assign someone to take the worker to a medical treatment facility. In cases of serious accidents, where the possible improper movement (transportation) of an injured worker could result in further injuries or unnecessary pain to the injured worker, an ambulance must be called (911).
- 2. Should the injured worker choose to be seen by his/ her family doctor, the injured worker must be given an Injury Management Package to be completed and returned before the following shift. Explain that your company has developed and implemented an Return to Work Program that requires all party's co-operation.
- 3. Should the employee <u>not</u> choose to attend the nearest medical walk in clinic on the day of accident or reporting and does not return page 3 of Form 8 or Functional Abilities Form prior to the next shift, the employee should be asked to cooperate and attend a walk-in clinic, arranged by the company, to have the Form 8 or Functional Abilities Form completed and returned to the Supervisor.
- 4. Assign suitable modified duties, if medically required, in accordance with the physical restrictions noted on the Form 8 third page or Functional Abilities Form.
 - Maintain regular contact with the program coordinator and injured worker to ensure progress and deal with difficulties encountered by the worker to avoid a recurrence.
- 5. Investigate the accident and provide a completed copy to the program coordinator to ensure all WSIB reporting requirements are met.

5.0 Contact with the Injured Worker

Under Section 40(1) of the WSIA, the employer of an injured worker shall co-operate in the return to work of the worker by,

40(1) (a) Contacting the worker as soon as possible after the injury occurs and maintaining communication throughout the period of the worker's recovery and impairment;

40(2) (a) The worker shall co-operate in his or her return to work by, contacting his or her employer as soon as possible after the injury occurs and maintaining communication throughout the period of the worker's recovery and impairment;

To ensure contact is established and maintained by the program coordinator. After the contact, a record of worker's contact regarding the injured worker will be maintained.

In the event that a problem cannot be resolved between the Supervisor, injured worker and the program coordinator, a meeting should be arranged between the parties for resolve. If the dispute cannot be resolved this matter can be taken up with the WSIB for dispute resolution.

Establishing Early Contact: If an employee is off due to an injury or illness, it is recommended (where appropriate depending on the severity or circumstances of the injured/ill employer) that contact be initiated by the supervisor and or the Health & Safety Coordinator within 24 to 48 hours. Contact can be a telephone call or a face to face meeting.

Frequency of Contact: The frequency of contact required by the employee and Health and Safety coordinator will be determined by the health recovery status. At minimum, a follow up case conference between the worker and Health and Safety coordinator by telephone at least biweekly.

Health Recovery: The Health and Safety coordinator will assist and support the injured employee during their recovery. The process will involve consultation with the treating health professional and the employee. The Health and Safety coordinator will obtain functional abilities to be utilized when developing the return to work plan.

6.0 Medical Monitoring and Treatment

Regular review of the workers physical abilities will provide an employer with the opportunity to accommodate an injured worker and facilitate the goal of returning a worker to his or her preinjury duties as soon as possible.

To assist in the medical monitoring and treatment, a worker should be given a Functional Abilities Form to have completed and returned to the employer on the day of the workers scheduled medical appointment.

Note: Section 22(5) of the WSIA, when filing a claim, a worker must consent to the disclosure to his/her employer information provided by a health professional concerning the worker's functional abilities for the purpose of facilitating the worker's return to work.

Dispute resolution process: In situations where there is an issue in dispute related to either the RTW process or the suitability of the RTW plan, and where a meeting with the worker did not resolve the dispute, the RTW Coordinator will refer the matter to Management to facilitate a resolution. All findings and discussions will be recorded. If the matter cannot be resolved, a referral to the WSIB may be made where the dispute involves cooperation in return to work or suitability of the job accommodation. The WSIB may then requisition a Return to Work Specialist to meet with all parties to assist in a resolution.

7.0 Provisions for Modified Work

Safe Duties - It is essential that an employer impress upon an injured employee that he/ she is a valuable employee and the Return to Work Program is not intended to cause further injury. Before returning an injured or ill employee to any form of work duty it is important to have pre-determined levels of accommodated Modified Duties for the injured worker to perform. (Example Modified Field Level Duties for less serious injuries where a worker can still perform some work on site and Sedentary Duties for more serious injuries, describing duties that can be performed in a shop/ office environment)

Other Available Work - The enclosed Suitable Modified Work Job Description or Physical Demands Analysis is designed to assist an employer in assembling/ documenting the duties of the modified positions to provide to the worker's treating physician for approval. In the case of a permanent impairment, the members of the JHSC will meet with the injured worker, and others, to consider what additional measures might be necessary for placement in a suitable and sustained permanent position that could require further (re) training.

Worker Progress Log - It is recommended that the supervisor make contact with the worker so that any difficulties can be communicated and readily resolved. The program coordinator should ensure that the worker is recording the Worker's Return to Work Progress and that it is being reviewed and signed by the supervisor, at the end of the first day back to work, and at the end of each week. These forms are to be completed at least until the worker is able to return to his/ her pre-accident job. After the injured worker has been integrated back into the workplace, the next stage is to ensure that the follow-up procedures are understood and followed.

8.0 Re-Integration of the Worker to Regular Work

Transitional Work - With injured workers who have been off for a substantial period of time due to a more serious injury, it is recommended to start them off working a transitional work program, usually starting work and gradually increased every week or every other week, as his/ her condition permits, until the injured worker is working pre-accident hours. It is felt that by implementing this gradual increase in hours, you are reducing the risk of re-injury or possibly a new injury. In addition, this return to work phase will assist the worker in re-adjusting (work hardening, acclimatizing) to working again, both physically and mentally. Supervisor together with the injured worker are encouraged to utilize whatever measures are most appropriate in the individual case.

Work Hardening – Through active rehabilitation treatment and work hardening, injured workers will be able to recover from their injuries in an expedient manner. Furthermore, rehabilitation treatment will help the injured worker understand the nature of the injury and methods of avoiding a recurrence (e.g. back injuries - proper lifting techniques). To ensure minimal disruption to the Return to Work Program, it is recommended that all physiotherapy and doctors appointments be arranged for the end of the workday or after work.

9.0 Monitoring and Evaluating the RTW program

Monitoring and Evaluating of our return to work program will be completed at the end of each year. The Health and Safety coordinator will complete the evaluation and present it to senior management for review. This review may also include feedback from individuals within the workplace that have gone through the RTW process. Following the review, Management will prepare an action plan and implement required changes.

The WSIB RTW Self Assessment tool will be used as the evaluation tool during the annual evaluation conducted by the Health & Safety Coordinator.

Section 13-6 – Traffic Management Plan

PURPOSE

The Traffic Management Plan must consider and address hazards with respect to access/egress to and from the project, vehicular movement on the project and pedestrian traffic.

SCOPE

Each project will be required to have a Traffic Management Plan designed to minimize potential hazards that may be created by vehicular traffic and/or mobile equipment.

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Assist in developing Traffic Management Plan for all workplaces and sites other than where the constructor or owner has already developed a plan to be used.
- 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:

- Take all measures reasonably necessary in the circumstances to protect employees from exposure to Traffic related hazards at all locations.
- Review Occupational Health and Safety Act and Regulations to ensure compliance within the Traffic Management Plan.
- Ensure the Traffic Management Plan 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:

- Assist in developing Traffic Management Plan for all workplaces and sites other than where the constructor or owner has already developed a plan to be used.
- 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 developing Traffic Management Plan for all workplaces and sites other than where the constructor or owner has already developed a plan to be used.
- 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 that the Traffic Control Persons (TCP) shall be competent and not perform any other work while directing traffic.

Section 13-6 – Traffic Management Plan

Foreman Responsibilities:

- Ensure known Traffic Control related hazards are defined with a site specific plan and contained in the Traffic Management Plan.
- Brief all workers and Subcontractors on the Traffic Management Plan.
- Provide education and training to workers who are responsible for traffic control.
- Take prompt and appropriate action when contraventions with the Traffic Control Plan have been identified.
- Ensure that the Traffic Control Persons (TCP) shall be competent and not perform any other work while directing traffic.
- Appoint TCP to coordinate and direct traffic flow on site as per Traffic Management Plan.
- Ensure that TCP is positioned in such a way that he or she is endangered as little as possible by vehicle and construction traffic.
- 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:

- When performing traffic control duties do not undertake any other responsibilities.
- If required, participate in Traffic Control training.
- Report any traffic control violations immediately to your Foreman.
- Adhere to the requirements outlined in the Traffic Management Plan developed and implemented for the project.
- 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.

PROCEDURE

Prior to commencement of work on the project, The **Superintendent** with the assistance of the **Project Manager** will;

- 1. Review the project layout drawings provided the constructor or owner representatives.
- 2. Review local bylaws that govern public ways.
- 3. Determine when peak traffic periods exist in the vicinity of the project and how traffic that accesses or egresses the project will be affected.
- 4. Review the schedule and determine when peak vehicular/pedestrian traffic may occur plan deliveries and/or other activities that may affect public ways accordingly.

Section 13-6 – Traffic Management Plan

Using a site map, ensure the following is define;

- Access / egress to and from the project
- Flow of traffic
- Parking of site vehicles (e.g. one side of the street)
- Delivery and off-loading areas
- Lay down areas
- Mobile equipment storage
- Emergency vehicle access
- Compound storage areas
- Restricted parking area

Develop a written site specific Traffic Management Plan that will be used in conjunction with a site map detailing all the specifics detailed above where the constructor, owner of site management has not already developed a plan to be used.

Notes:

- 1. Through a well defined Traffic Management Plan, the safe movement of vehicular traffic and mobile equipment can be achieved.
- 2. The plan must be designed with a view to eliminate reversing of vehicular traffic and mobile equipment.
- 3. The flow of traffic on the site must be designed to allow for emergency vehicles to have complete access to all areas of the project
- 4. Depending on the project location, local police may be required to conduct traffic control duties, or trained traffic control personnel may be required.

Review the plan on a regular basis to ensure that it meets the ever-changing construction environment.

Re-distribute and review with those affected

DISTRIBUTION

The Traffic Management Plan will be distributed as follows;

- To all Subcontractors and Suppliers during orientation meetings
- Reviewed with all workers
- Reviewed with Trained Traffic Control Personnel
- The Superintendent, Foreman and Health and Safety Coordinator

RECORDS

Documentation and other information must be maintained on file for the duration of the project. Upon completion of the project, all information related to the Traffic Management Plan must be submitted to Head Office with all post site documentation.

PURPOSE

This Program provides an overview of a system to direct owners, constructors, employers, contractors, supervisors and workers involved in confined space entry work to work safely.

SCOPE

This confined space and safe work procedures, training and equipment must be employed to work in all potential confined space situations.

OVERVIEW

Entry to confined space includes many risks including restricted access/egress, atmospheric hazards, physical and biological hazards, process hazards, etc. In an effort to reduce and control these hazards, precautions are required to be implemented prior to and during confined space entry in accordance with Confined Space Regulation 632/05.

Definitions:

Atmospheric hazards:

- (a) the accumulation of flammable, combustible or explosive agents,
- (b) an oxygen content in the atmosphere that is less than 19.5 per cent or more than 23 per cent by volume, or
- (c) the accumulation of atmospheric contaminants, including gases, vapours, fumes, dusts or mists, that could,
 - (i) result in acute health effects that pose an immediate threat to life, or
 - (ii) interfere with a person's ability to escape unaided from a confined space

Confined Space:

A fully or partially enclosed space,

- (a) that is not both designed and constructed for continuous human occupancy, and
- (b) in which atmospheric hazards may occur because of its construction, location or contents or because of work that is done in it.

Attendant

An attendant is a competent person that is to be assigned and stationed outside and near the entrance of the confined space. The attendant is not allowed to enter the confined space under any circumstances. The attendant is required to be in communication with all workers in the confined space at all times (e.g. verbally, two-way radio, etc.). The attendant is required to monitor the safety of the worker, provide assistance or contact rescue personnel as required.

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Develop confined space procedures and safe work procedures to define corporate expectations relating to Confined Space work.
- 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 subcontractors 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.

Gazzola Paving Limited Revision Date: July 15, 2022 Health and Safety Manual

Foreman Responsibilities:

- Ensure confined space and safe work procedures, training and equipment are procured as required.
- 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:

- 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 Superintendent / Forman any contravention of the Occupational Health and Safety Act and Regulations or the absence/defect in any equipment or protective device;

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) **(13-7-1 Form)** shall be completed before (and during) each entry into a confined space. This will 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.

STANDARD WORK PROCEDURE

Each Employer and/or Subcontractor who is associated with working in a Confined Space must submit a written copy of their confined space and rescue procedures prior to the commencement of work.

All health and safety hazards shall be eliminated or adequately controlled by engineering, administrative or other control measures before entry is made into a confined space.

When the confined space entry work involves multiple employers and/ or contractors working in the area at the same time, the constructor is responsible for the preparation of the coordination document. Each employer participating in confined space entry will receive a copy of the coordination document.

The coordination document will ensure all workplace parties involved with confined space entry complete the required documentation and have implemented the appropriate control and training requirements.

In either situation, the Confined Space Entry Program and process will focus on:

- Performing a written site specific hazard assessment can be incorporated into the CSEP
- Ensuring all persons involved in the confined space entry are competent persons/ workers and documentation of these credentials are available
- Atmospheric assessment and monitoring equipment is available with appropriate calibration and bump test records available
- Continuous monitoring will be provided prior to entry and when any worker is in the confined space
- Providing a dedicated Confined Space Attendant who is competent, trained and present at the opening of the confined space
- Providing all appropriate Personal Protective Equipment, rescue gear and appropriate numbers of trained personnel to effect a rescue, with training records available
- Emergency response team which is readily available, trained, and with the appropriate equipment necessary for the situation
- Ensuring that there is a worker who is trained in First Aid and CPR readily available In the event that all of these stipulations cannot be met, it is suggested that a third party Subcontractor, who is specifically trained and equipped in confined space entry and rescue procedures be retained. These third party contractors must have the necessary rescue equipment and trained in place with prepared rescuers to conduct and carry out their safe rescue procedures.

RESCUE PLANNING

A vast array of health and safety and rescue equipment is required to ensure safe entries into and rescues from a space deemed to be a Confined Space.

These items must be supplied and maintained by the employer and evaluated by a competent worker prior to each use to ensure that they are functioning properly. The extent of actual equipment required will depend on which hazards are present and the atmospheric and physical surroundings of the area to be entered.

This will be addressed on the Confined Space Entry Permit (CSEP) (13-7-1 Form) and under Confined Space Entry Control Plans and Confined Space Entry Permits.

Additional training must be provided to every worker who will be involved in Confined Space. This training will include generic and hazard specific training and hands-on usage of all required equipment. This will ensure that all workers who may be required to use the equipment will become proficient in its use and understanding of its function and limitations.

COMMUNICATION

This program is to be communicated with all workers required to perform confined space entry or work involving a confined space.

LEGISLATION

The confined space legislation (Regulation 632/05) addressed in these guidelines denote minimum standards or requirements. As outlined in the site specific safe work procedures more stringent or rigorous measures may/ will have to be implemented.

Each individual entering a confined space should be competent - aware of all potential hazards, follow the prescribed safe work procedures - as addressed in the CSEP - and know the limitations of the equipment/ devices being used.

These guidelines have been worded to incorporate the intent and "best practice" principles from a variety of legislative requirements, codes, standards and work sectors in Ontario and across Canada.

Note: That provincial governed employers working on federal projects must determine which standards apply.

RECORDS

Records of; inventories (locations), assessments, coordination plans, equipment inspections, training records, and Confined Space Entry Permits shall be completed and kept on file for at least one year after confined space entry is completed.

These records may/ will be used as reference material for future entries into confined spaces or controlled access areas.

DISTRIBUTION

All owners, constructors, contractors, supervisors and workers working in or around confined space or controlled access areas shall receive copies of the agreed to safe work procedures and these are to be made available upon request to the Joint Health and Safety Committees and/ or Worker Representatives.

You don't have to prove it is a confined space...
You have to prove it is not.



Confined Space Entry Permit

	Work Sale for Life								
	Effective://		From	::	am _ pm			To::	am pm
100	Location of Confined Space:			Pr	oject N	ame			
no	Employer Name:	Employer Name: Competent Person:							
ocation	Assessment Performed by:					Pern	nit Issuer:		2
Lo	Description of Confined Space:								
	Description of Work to be Performed:								
	Note: The	permit sh	all comply v	with the relev	ant pla	n.			
	Air Monitor Name		Serial #		and an artist and a state of the state of th		Last Calibra	ation/Bump	Test
			C 1 1812	37 3 33	Time o	of Te	est	146 7261	
Results	Oxygen %								
Ses	Combustibles %								
	Carbon monoxide (CO)								
Quality	Hydrogen sulphide (H ₂ S)								
	Other atmospheric hazard ()								
Air	Tester's Name (print):			Signature	:				
		-				S 000			
	Atmospheric/Physical Hazards		Cont	rols			Personal Pro	tective Eq	uipment
	☐ Flammable	Purg		** . *			Respirator		
S	Toxic		nanical vent				Gloves		
Controls	Corrosive		ıral ventilati			Boots			
Con	Oxygen deficient/enriched	☐ De-e	nergize, loc	Kout			Eye protecti		
So	☐ Hot temperatures ☐ Electrical						Head protection		
rds	☐ Slippery surfaces	☐ Inerting				Other:			
Hazards	☐ Lighting	Other: Other:				Other:			
I	☐ Hot work	Other:				Other:			
	☐ Working at heights	☐ Othe				_	Other:		
	Other	☐ Othe					Other:		
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m	Worker Name Permit Re with Wo		Time In	Time Out	Time	In	Time Out	Time In	Time Out
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Attendant									
A	Attendant's Name (print):			Attendant's	Signat	ure:			
ent	☐ Winch ☐ Respirator ☐ Lac	dder	☐ Tripod	☐ Harne	ess				
Rescue	Other: Other:			Other:			Other	0	
Rau	Rescue equipment inspected and in go	od workii	ng order?	☐ Yes	□ No)			
	nfirmation of Strands S	ignature				Da	ate ,	Ti	me

PURPOSE

This Program provides an overview of a system to control the handling, transporting, storage and operation of nuclear radiation portable gauges. The program has been developed to ensure compliance with the Nuclear Safety and Control Act (NSCA), the requirements and guidelines provided by the Canadian Nuclear Safety Commission (CNSC).

SCOPE

This program applies to all Gazzola Paving Ltd's personnel involved in the handling, transporting, storage and operation of nuclear radiation portable gauges. The program also extends to include emergency situations and measures for protection of the public and any affected personnel due to the use of portable gauges by Gazzola Paving Ltd.

OVERVIEW

The nuclear gauge is used to calculate and display percent compaction of Asphalt using a radiation source and based on user defined laboratory values.

Any worker who is required to perform duties with a reasonable probability of receiving a radiation dose greater than 1 mSv per year is defined as a nuclear energy worker (NEW). The regulatory dose limits for NEWs are 50 mSv per year and 100 mSv over a five-year period.

Definitions:

Becquerel (Bq):

The International System of Units (SI) unit of radioactivity. One becquerel (Bq) is the activity of a quantity of radioactive material in which one nucleus decays per second. In Canada, the Bq is used instead of the non-SI unit curie (Ci).

Canadian Nuclear Safety Commission (CNSC):

Canada's nuclear regulator, established under the Nuclear Safety & Control Act to regulate the use of nuclear energy and materials to protect health, safety, security and the environment.

Dose:

The radiation absorbed by the body.

Dosimeter:

A device for measuring a dose of radiation that is worn or carried by an individual. There are several types of personal dosimeters such as on optically stimulated luminescent dosimeters (OSLD) and direct reading dosimeters (DRD).

Ionizing Radiation:

Radiation capable of producing ion pairs in biological material(s).

Licensee:

A company or a person to whom a CNSC license has been issued for the possession and use of nuclear substances and radiation devices.

Nuclear Energy Worker (NEW):

A person who is required, in the course of the person's business or occupation in connection with a nuclear substance or nuclear facility, to perform duties in such circumstances that there is a reasonable probability that the person may receive a dose of radiation that is greater than the prescribed limit for the general public.

Radiation Safety Officer (RSO):

A radiation safety specialist implements and administers a radiation safety program.

Sivert (Sv):

The International System of Units (SI) unit of equivalent dose and effective dose, equal to 1 joule/kilogram.

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Assist in developing corporate health and safety documentation, policies and procedures where required.
- Schedule and coordinate training as required.
- Comply with all the requirements as defined under the Nuclear Safety and Control Act (NSCA) and the Requirements of the (CNSC) in addition to the Occupational Health and Safety Act (OHSA) and Regulations.
- Distribute and communicate information to the appropriate parties regarding any nonconformance or deficiencies reported.

Senior Management Responsibilities:

- Obtain and maintain the license to operate nuclear portable gauges issued by the Canadian Nuclear Safety Committee (CNSC).
- Develop and maintain the radiation protection program to ensure Svi that doses are kept as low as reasonably achievable (ALARA).
- Inform workers of their status upon becoming Nuclear Energy Workers (NEW)s and maintain records of the informed consent.
- Ensure all company employees receive the appropriate training and workplace specific overviews.
- Comply with all the requirements as defined under the Nuclear Safety and Control Act (NSCA) and the Requirements of the (CNSC) in addition to the Occupational Health and Safety Act (OHSA) 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;

Radiation Safety Officer Responsibilities:

- Ensure the effective management and implementation of the Radiation Protection Program.
- Ensure the safe use and maintenance of the nuclear portable gauges in accordance with the licensing and requirements by the CNSC.

- Immediately report to the CNSC duty officer about any unusual events, accidents or incidents involving the portable gauges.
- Maintain their status as the Radiation Safety Officer through maintenance of the training requirements.
- Works in the manner and with the protective devices, measures and procedures required by the Nuclear Safety and Control Act (NSCA) and the Requirements of the (CNSC) in addition to the Occupational Health and Safety Act and Regulations;
- Advise radiation workers 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.

Radiation Workers Responsibilities:

- Ensure the safe conduct of their work, and comply with all applicable regulatory requirements.
- Comply with the radiation protection program established by Gazzola Paving Ltd., in accordance with regulatory requirements.
- Ensure the portable gauge is either under the constant surveillance of a worker, secured in a transport vehicle, or at the storage location.
- Works in the manner and with the protective devices, measures and procedures required by the Nuclear Safety and Control Act (NSCA) and the Requirements of the (CNSC) in addition to the Occupational Health and Safety Act (OHSA) and Regulations
- Report to the Radiation Safety Officer any contravention of the Nuclear Safety and Control
 Act (NSCA) and the Requirements of the (CNSC) in addition to the Occupational Health
 and Safety Act and Regulations or the absence/defect in any equipment or protective
 device;

RADIATION

Radiation is energy emitted by an atom or other body as it changes from a higher energy state to a lower energy state. Radiation can be classified as ionizing or nonionizing radiation. Nuclear energy produces ionizing radiation.

Natural background radiation is found in building materials, soil, rocks, air, some foods, and our bodies. It contributes to about three quarters of our annual radiation exposure.

Radiation dose examples

1,000 mSv	Dose which may cause symptoms of radiation sickness
100 mSv	Five-year dose limit for nuclear energy workers
mSv	Annual dose limit for nuclear energy workers
mSv	Typical chest CT scan
1.8 mSv	Average annual dose from natural background radiation in Canada
mSv	Annual public dose limit
mŠ1	Average annual dose to a portable gauge worker
0.02 mSv	Typical cross-Canada flight

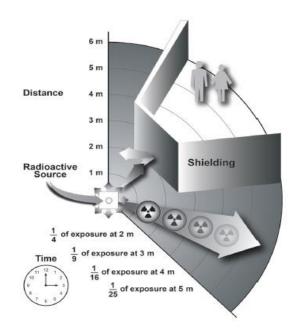
RADIATION PROTECTION

The principles of radiation protection include:

Time – The shorter the time spent close to the source, the lower the radiation dose received will be.

Distance – The intensity of radiation decreases sharply as a person moves farther away from the radioactive source.

Shielding – The thicker the protective material placed between the person and the source, the less radiation to which a person will be exposed. The shielding material must be appropriate for the type of radiation.



RADIATION PROTECTION PROCEDURE

License:

The CNSC is the federal agency responsible for regulating the nuclear industry in Canada. The CNSC enforces the NSCA and its regulations, issue licences and certify radiation devices. The CNSC also continually monitor licensees to ensure compliance with regulatory requirements. All radiation devices used in Canada must be certified, to ensure they are safe for use for their intended application.

Gazzola Paving Ltd. has been issued licensing by the CNSC to operate portable gauges for the purposes of Asphalt Sampling. Licensing is maintained following a successful audit by the CNSC every 2 years. **Gazzola Paving Ltd.** will comply with all measures, procedures and requirements for the purpose of maintaining licensing. A copy of the license will be posted in the Asphalt Lab.

Radiation doses:

Gazzola Paving Ltd. will record doses for all persons that are present or perform work with or around portable gauges to ensure that doses are kept as low as reasonably achievable (ALARA) and that workers do not exceed the prescribed dose limits.

All involved workers must use and wear an approved dosimeter from a CNSC licensed dosimetry services provider. Dosimeters readings are analyzed quarterly by a certified laboratory and a result report is provided. The reports must be available to all involved workers for review on a regular basis.

Workers must implement the following while using personal dosimeters:

- Wear the personal dosimeter on the front of the trunk of your body
- Dosimeters must not be shared
- Store as recommended by the manufacturer in low radiation background areas

- Follow manufacturer/supplier recommendations for care and use of dosimeters
- Dosimeters should not be exposed to:
 - o high temperatures
 - o water
 - o direct sunlight or
 - fluorescent light

Most portable gauge workers are not considered nuclear energy workers (non-NEWs). However, If there is a reasonable probability that doses may approach 1 mSv/year, Gazzola Paving Ltd. must inform the non-NEW workers that they are a NEW and will retain the records of informed consent.

Training:

All Gazzola Paving Ltd. portable gauge workers must be trained on the following:

- Basic radiation safety information, including keeping doses as low as reasonably achievable (ALARA)
- Asphalt Lab Operations WTS, this radiation protection program including worker responsibilities and regulatory requirements
- Transportation of Dangerous Goods (Class 7)

Radiation Safety Officer Training:

At **Gazzola Paving Ltd.**, the asphalt lab supervisor is the designated Radiation Safety Officer. The lab supervisor must maintain their certification as the Radiation Safety Officer responsible for the effective management and implementation of this program. Training includes radiation protection principles, methods and practices in accordance with the regulatory requirements.

All required training must be refreshed every 3 years at a minimum.

<u>Transportation:</u>

- When packaging the gauge for transport, make sure the shutter is fully closed. Ensure
 the gauge and transport case are not damaged, and that the transport case has all the
 required markings and labels.
- The gauge must be locked and secured to the truck while in transport.
- All workers handling, transporting or storing the nuclear gauge must be competent and trained in accordance with the Transportation of Dangerous Goods Regulations (Class 7). Gauge operators must have their (TDG) certificate with them at all times.

Operation:

- Before you start using the portable gauge, ensure to attach your radiation exposure dosimeter between your neck and waist.
- Inform the site supervisor of your attendance, sign off on the Gazz Card before taking your asphalt sample.
- When using the gauge, don't hover over it or point it at anyone while the source is exposed.

- Keep your co-workers and anyone else in the area at least two meters away from the gauge. Once it is set, move away from the gauge.
- Gauges must always be under direct supervision by a competent and trained person (Radiation Safety Officer). The gauge must be locked safely and securely if unattended

Storage:

The gauge must be stored inside the Asphalt Lab C-container, the container must be locked and secured with access allowed to authorized workers only. The C-container must be identified with the radioactive hazard label on it at all times.

When not in use and before storing or transporting the portable gauge:

- Ensure the gauge shutter is properly functioning and fully closed. (A portable gauge with an open or partially open shutter poses a risk of exposure to the worker and the public. If the shutter cannot be closed, the Radiation Safety Officer must be notified immediately so that this situation can be reported to the CNSC)
- Store the gauge in its locked, tamper-resistant container (Type A labeled transport case).
- Identify the package with the carrier's name, in case the gauge is lost, damaged or misplaced.

Maintenance:

The portable gauge must be leak-tested annually in accordance with the regulatory requirements. Leak tests will be conducted to detect a leak of 200 Bq or more.

If the portable gauge was found to be leaking:

- Remove the gauge from service immediately, place it in the package container and attach an "Out of service" tag on the container.
- Place the package container in the designated storage C-container. Only authorized and trained workers are allowed access to the C-container.
- Notify the CNSC duty officer immediately at 1-844-879-0805.

Radiation Survey Meters:

A radiation survey meter measures the radiation dose rate level at the position checked. In compliance with the regulatory requirements, **Gazzola Paving Ltd.** will ensure that a calibrated radiation survey meter be available within two (2) hours' distance of the site where a radiation device (gauge) is used as authorized by the licence.

Radiation survey meters must be calibrated every 12 months in accordance with CNSC requirements.

EMERGENCY PROCEDURES

Gazzola Paving Ltd. has developed emergency procedures to respond and manage emergency situations and as plans of action in cases of loss, theft, fire, an accident or damage to the portable gauge.

In general, the following steps should be followed:

- Stop work immediately.
- Keep people at least 2 metres away (approximately 6 feet) until the source is removed or until radiation levels are known to be safe.
- Immediately inform the radiation safety officer.
- If the damage is minor, and the source is in the safe, shielded position, the transport case can be used to transport the device. If you do not have a radiation survey meter, do not move a damaged gauge until its radiation level is checked.
- If the damage is severe or the source rod will not retract, an alternate transport case may be used. A calibrated survey meter must be used to ensure safe radiation levels.
- Before the site is reopened for regular use, the Radiation Safety Officer must ensure that all sources have been recovered.
- In case of an accident or fire, do not use the gauge until the damage is assessed. A leak test must be performed after any incident that may have resulted in source damage.
- Inform the CNSC immediately of any theft, accident or incident.

Lost or stolen gauges

- A missing or stolen radiation device containing radioactive source(s) can be a significant hazard if found by members of the public unaware of the radiation danger. It is critical that all personnel working with a radiation device be aware of the security implications.
- Immediately report any lost or stolen radiation device or nuclear substance, or vehicle containing a radiation device or nuclear substance to the CNSC by calling the CNSC duty officer at 1-844-879-0805.
- The Radiation Safety Officer should also immediately report a loss or theft to the Police.

COMMUNICATION

This program is to be communicated with all workers involved in the handling, transporting, storage and operation of nuclear radiation portable gauges.

RECORDS

Records of; licensing, training, samples, equipment inspections and Calibration shall be completed and kept on file.

These records may/ will be used as reference material.

DISTRIBUTION

All workers involved in the handling, transporting, storage and operation of nuclear radiation portable gauges shall receive copies of the agreed to safe work procedures and these are to be made available upon request to the Joint Health and Safety Committees and/ or Worker Representatives.



GAZZOLA PAVING LIMITED Management Review Policy

The Senior Management at Gazzola Paving Limited is committed to regular review of the Occupational Health and Safety Program. Management review will be conducted regularly during management safety meetings for all aspects of the health and safety program including policies, procedures, documents and recorded safety performance indicators.

Senior Management of Gazzola Paving Limited is also committed to an annual review of the Occupational Health and Safety program in its entirety in addition to the review of yearly statistical data collected with the aim of assessing the success and effectiveness of the Occupational Health and Safety Program and Continuous Improvement.

The Senior Management at Gazzola Paving Limited will initiate and maintain an action plan for continuous improvement based on the annual review. The continuous improvement plan will be based on current health and safety trends such as:

- Injury/illness cause,
- Workplace inspections,
- Injury/incident investigations,
- Hazard reports,
- Work refusal reports,
- Joint health and safety committee recommendations, and
- All other health and safety information available.

Improvement opportunities from the above list will be developed as current health and safety objectives.

All improvements to Gazzola Paving Limited health and safety program will be recorded, and the revisions will be communicated to all employees through the health and safety posting board, or where necessary, through a training or orientation session.

Virgil Gazzola, Vice-Present

March 18, 2025

Date



GAZZOLA PAVING LIMITED Management of Change Policy Statement

Gazzola Paving Limited believes that change must be managed, starting with proper assessments when there is a need for change, going through an approval system for agreed changes and communicating all change results to all applicable parties.

Gazzola Paving Limited will identify situations where change is needed, that will include as a minimum:

- 1. Changes in the applicable legal requirements
- 2. Significant changes in our work processes, equipment, control measures, organization or work locations
- 3. Introduction of new products, processes or services
- 4. Introduction of new Health & Safety knowledge or technology
- 5. Any other change that may have a significant effect on our Health & Safety Management System

All approved changes must go through the process of task and hazard assessments to identify the resulting hazards and the appropriate control measures that must be taken.

Gazzola Paving Limited will communicate changes to the Health and Safety Management System on at least annual basis during the Annual Refresher Orientations for all employees. Gazzola Paving Limited will also assess training needs and perform training on significant changes when required.

Gazzola Paving Limited will maintain records of all applied changes to the Health & Safety Management System in addition to the corresponding communication with all applicable parties.

Virgil Gazzola, Vice-President

March 18, 2025

Date

PURPOSE

Senior Management at Gazzola is committed to an annual review of the Occupational Health and Safety Management System in its entirety with the goal of ensuring continuous improvement of the Health and Safety Management System and ensuring compliance is maintained with the most current legislative requirements.

SCOPE

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.

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Schedule and hold quarterly management Health and Safety review meetings to identify actives relating to Programs, Revision, Procedures, Statistics, Policies, and Follow up activities.
- Record and distribute meeting minute's and updates to the appropriate parties as required.
- Create an annual report summarizing and identifying trends from the information reviewed and approved within management meetings.
- During the annual review of all the Health and Safety Programs, Procedures, Policies and Guidelines, identify appropriate targets and objectives to be completed annually.
- 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:

- Direct and participate in the quarterly management Health and Safety review meetings to identify actives 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 and provide input when requested to all distributed documentation from the annual review.
- 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:

- Participate and provide input when requested to all distributed documentation from the management meetings.
- 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 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 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:

- 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.

MANAGEMENET REVIEWS

Bi-Monthly Reviews:

The Health and Safety Coordinator will schedule bi-monthly management meetings to review and identify activities relating to company related statistics, investigations, reports, disciplinary actions and inspection findings with 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.

Completed and approved packages will be distributed at this time by 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 if required.

The Health and Safety Coordinator will document the meeting content and any changes and to communicate the changes to the workforce.

Annual Review:

In addition to on-going reviews of different aspects of the Health and Safety Management System on the bi-monthly safety meetings, Senior Management will conduct a full annual review of the Occupational Health and Safety Management System in its entirety. The goal is to ensure continuous improvement of the Health and Safety Management System and ensuring compliance is maintained with the most current legislative requirements.

The annual review will be documented using the Annual Management Review Form (14-1-1) and records will be kept and maintained as part of the Annual Report at the office.

ANNUAL REVIEW PROCEDURE

The Health and Safety Coordinator shall provide Senior Management with completed packages of related health and safety material for the annual review.

The annual review will include, but is not limited to:

- Evaluation of <u>all elements</u> of the Health and Safety Management System.
- The Health and Safety Performance of the Company and how it stands in comparison with past performance (3 years) based on the statistical data collected as per Gazzola Statistics and Records Procedure.
- Status of actions and any outstanding items from previous management reviews.
- Status of completion of the last annual Health and Safety Objectives and to what extent these objectives have been met.
- The results of all internal and external audits conducted on the Health and Safety Management System including COR audits.
- All identified changes or updates required to the Health and Safety Policies.
- Hazard and risk assessments and any related changes or updates identified to be required.
- Workplace Task Standards (WTS).

- Evaluation of compliance with legal requirements as per Gazzola Legislation and other requirements procedure in addition to any change in circumstances to Health and Safety as a result of developments in these identified legislations or technology.
- Workplace Inspection reports and significant findings identified.
- Results of Investigation of injuries and illness data including all trends identified and the implementation of corrective and preventive actions taken and their current status.
- Results of the communication and consultation with employees and the Health and Safety Representatives on all Health and Safety related meetings.
- Work refusal situations and any related reports.
- All significant communication from external parties including (MLTSD, WSIB, IHSA....etc.)
- Any identified barriers to worker participation in the Health and Safety Management System.
- A general review and assessment of all significant recommendations and opportunities for continuous improvement identified by any workplace party through any means of internal or external communication.

ANNUAL REPORT

Annually, the Health and Safety Coordinator will create an annual report summarizing and identifying trends from the information reviewed and approved during the annual review. The annual 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. This information will be summarized from the findings and topics covered on the annual review. The annual report may include reviews performed by management during the bi-monthly management meetings as required.

The annual report will include, but not limited to, the following:

- Status of completion of the last annual Health and Safety Objectives and to what extent these objectives have been met.
- Any updates to the Health and Safety policies.
- Any updates to policies, programs, procedures, documents or elements of the Health and Safety Management System and any revisions as appropriate.
- Results of measuring Health and Safety Performance and a comparison of 3 years of annual cycle performance based on the statistical data collected as per Gazzola Statistics and Records Procedure.
- Measurable Health and Safety Objectives for the new annual cycle.
- An action plan to achieve the identified new objectives.
- Required resources to achieve the identified new objectives.

Actions taken to remove any identified barrier to worker participation in the Health and Safety Management System.

The Annual Report will also be documented on the Annual Review Form (14-1-1) and records will be kept and maintained at the office.

DISTRIBUTION

All revisions will be distributed using the 4S system to any member of the company who has a copy of the Health and Safety Manual, including;

- the Foreman,
- the Superintendent
- the Project Manager
- the Health and Safety Coordinator
- All workers

RECORDS

All revisions made to the health and safety program will be documented and retained on file at head office.

COMMUNICATION

The results of the annual management review in addition to the new objectives and action plan will be communicated with all employees using the 4S system in the form of the Complete Annual Report.



Locatio	on of Meeting:					
	g Date:					
-	s Prepared By:					
		Attendance				
	Name	Title/Position	Signature			
Meeting						
Minute R						
	A	genda Items to Be Discussed				
Item	Daview of Durviews Continued T	Review Topics	Note at the control of the control o			
1.	Discussion:	mprovement Action Plan, Previous C	objectives & their status			
1.						
		Program Elements				
_	Health & Safety Policy Statement					
2.	Discussion:					
	Section 1-1 (Policies & Stateme					
	1B – Environmental Policy Statement 1C – Visitors Policy Statement					
3.	1D – Fit to Work Policy Statement Discussion:					
	DISCUSSIOII.					
	Section 1 Procedures (forms inc 1-2 Documents & Records Control F					
4.	1-3 Duties & Responsibilities	ords Control Procedure				
	<u>Discussion</u> :					
	Section 1 Records, findings & re Records Control)	ecommendations for improvement (Effectiveness of Document &			
5.	nccorus control)					
	Section 2 (Hazard Assessment,	Analysis & Control) Policy Statemer	nt			
6.	Discussion:					

Revision Date: March 10, 2023 Reviewed Date: March 18, 2025



	T			
	Section 2 (Hazard Assessment, Analysis & Control) Procedures (forms included)			
	2-1 Pre-project Requirement			
7.	2-2 GAZZ Card — Daily Hazard Assessment Procedure 2-3 Workplace Task Standards (WTS) Procedure			
	Discussion:			
	<u>515C4551611</u> 1			
	Section 2 (Hazard Assessment, Analysis & Control) Records, findings & recommendations for			
	improvement Review of GAZZ Card Records			
_	Review of GAZZ Card Records Review of WTS List			
8.	Review of WTS List Review of all WTSs			
	Discussion:			
	Section 3 (Controls) Policy Statement			
9.	, , ,			
9.	<u>Discussion</u> :			
	Section 3 (Controls) Procedure (forms included)			
10.	<u>Discussion</u> :			
	Section 3 (Controls) Records, findings & recommendations for improvement			
	Review of Daily GAZZ Card Controls			
11.	Review of WTS Controls			
	Review of Controls Effectiveness			
	<u>Discussion</u> :			
	Section 4 (Procurement & Contractor Management) Policy Statement			
12.	<u>Discussion</u> :			
	Section 4 (Procurement & Contractor Management) Procedure (forms included)			
13.	<u>Discussion</u> :			
	Section 4 (Procurement & Contractor Management) Records, findings & recommendations for			
	improvement			
14	improvement Review of Subcontractors Applications			
14.	improvement Review of Subcontractors Applications Review of Subcontractors Performance Evaluations			
14.	improvement Review of Subcontractors Applications			
	improvement Review of Subcontractors Applications Review of Subcontractors Performance Evaluations Discussion: Section 5 (Company Rules) Policy Statement			
14.	improvement Review of Subcontractors Applications Review of Subcontractors Performance Evaluations Discussion:			
	improvement Review of Subcontractors Applications Review of Subcontractors Performance Evaluations Discussion: Section 5 (Company Rules) Policy Statement			
	improvement Review of Subcontractors Applications Review of Subcontractors Performance Evaluations Discussion: Section 5 (Company Rules) Policy Statement Discussion:			
15.	improvement Review of Subcontractors Applications Review of Subcontractors Performance Evaluations Discussion: Section 5 (Company Rules) Policy Statement Discussion: Section 5 (Company Rules) Procedure (forms included) Discussion: Section 5 (Company Rules) Records, findings & recommendations for improvement			
15. 16.	improvement Review of Subcontractors Applications Review of Subcontractors Performance Evaluations Discussion: Section 5 (Company Rules) Policy Statement Discussion: Section 5 (Company Rules) Procedure (forms included) Discussion: Section 5 (Company Rules) Records, findings & recommendations for improvement Review of Recorded Safety violations			
15.	improvement Review of Subcontractors Applications Review of Subcontractors Performance Evaluations Discussion: Section 5 (Company Rules) Policy Statement Discussion: Section 5 (Company Rules) Procedure (forms included) Discussion: Section 5 (Company Rules) Records, findings & recommendations for improvement			

Revision Date: March 10, 2023 Reviewed Date: March 18, 2025



18.	Section 6 (Personal Protective Equipment PPE) Policy Statement				
	<u>Discussion</u> :				
	Section 6 (Personal Protective Equipment PPE) Procedure (forms included)				
19.	<u>Discussion</u> :				
20.	Section 6 (Personal Protective Equipment PPE) Records, findings & recommendations for improvement Review of PPE availability & Effectiveness				
20.	Review of PPE Inspections <u>Discussion</u> :				
	Section 7 (Preventative Maintenance) Policy Statement				
21.	<u>Discussion</u> :				
	Section 7 (Preventative Maintenance) Procedure (forms included)				
22.	<u>Discussion</u> :				
23.	Section 7 (Preventative Maintenance) Records, findings & recommendations for improvement Review of Inventory Review of Implementation & Effectiveness of Preventative Maintenance				
23.	Discussion:				
	Section 8-1 (Training) Policy Statement				
24.	<u>Discussion</u> :				
	Section 8-1 (Training) Procedure (forms included)				
25.	<u>Discussion</u> :				
26.	Section 8-1 (Training) Records, findings & recommendations for improvement Review of training needs & analysis Review of training effectiveness Review of training matrix Review of Orientation program & records				
	Discussion:				
	Section 8-2 (Communication) Policy Statement				
27.	Discussion:				
	Section 8-2 (Communication) Procedure (forms included)				
28.	<u>Discussion</u> :				
	Section 8-2 (Communication) Records, findings & recommendations for improvement Review of Internal communication (H&S Reps/JHSC, Safety meetings, tailgate talks)				
29.	Review of results of participation & consultation with employees (H&S Reps/JHSC) Review of External communication (MLTSD, WSIB, IHSA)				

Revision Date: March 10, 2023 Page 3 of 8 Form 14-1-1 Reviewed Date: March 18, 2025



	Section 8-3 (Joint Health & Safety Committees - JHSC) Procedure (forms included)
30.	<u>Discussion</u> :
31.	Section 8-3 (Joint Health & Safety Committees - JHSC) Records, findings & recommendations for improvement Review of JHSC effectiveness Review of JHSC meetings & minutes
	<u>Discussion</u> :
	Section 9 (Workplace Inspections) Policy Statement
32.	<u>Discussion</u> :
33.	Section 9 (Workplace Inspections) Procedures (forms included) 9-1 Workplace Inspections 9-2 Pre-use Inspections
	<u>Discussion</u> :
34.	Section 9 (Workplace Inspections) Records, findings & recommendations for improvement Review of Workplace Inspection records (Weekly & Monthly) Review of Pre-use Inspection records
•	Discussion:
35.	Section 10 (Investigations & Reporting) Policy Statement
<i>3</i> 3.	<u>Discussion</u> :
36.	Section 10 (Investigations & Reporting) Procedure (forms included)
30.	<u>Discussion</u> :
37.	Section 10 (Investigations & Reporting) Records, findings & recommendations for improvement Review of status of investigations and trends identified Review of implementation & effectiveness of corrective & preventative actions and their status
	<u>Discussion</u> :
	Section 11 (Emergency Preparedness) Policy Statement
38.	<u>Discussion</u> :
39.	Section 11 (Emergency Preparedness) Procedures (forms included) 11-1 Emergency Plan 11-2 Fall Prevention Plan
	<u>Discussion</u> :
40.	Section 11 (Emergency Preparedness) Records, findings & recommendations for improvement Review of emergency plans & communication Review of effectiveness of emergency drills
	<u>Discussion</u> :
41.	Section 12 (Statistics & Records) Policy Statement

Form 14-1-1

Revision Date: March 10, 2023 Page 4 of 8



	<u>Discussion</u> :
	Section 12 (Statistics & Records) Procedure (forms included)
42.	Discussion:
43.	Section 12 (Statistics & Records) Records, findings & recommendations for improvement Review of OHS performance Trend Analysis (Measurement of company performance and comparison with last performances)
	<u>Discussion</u> :
	Section 13 (Legislation & other requirements) Policy Statements
	Return to Work Policy Statement Workplace Harassment Prevention Policy Statement
44.	Workplace Violence Prevention Policy Statement
	<u>Discussion</u> :
	Section 13 (Legislation & other requirements) Procedures (forms included)
	13-1 Legislation & Other requirements
	13-2 Workplace Violence & Harassment 13-3 First Aid
	13-4 Workplace Hazardous Materials Information System (WHMIS)
45.	13-5 Return to Work (RTW)
	13-6 Traffic Management Plan 13-7 Confined Space Entry Procedures
	Discussion:
	Section 13 (Legislation & other requirements) Records, findings & recommendations for
	improvement
	Review of Legislative Compliance (Evaluation of Legislative Compliance)
	Review of Violence & Harassment Incidents, Complaints & Investigations
	Review of Workplace Violence Assessments Review of First Aid records
46.	Review of Occupational health Incidents/records
	Review of WSIB claims & reports
	Review of traffic management records
	Review of Confined space entry records and implementation Discussion:
	<u>=13C43351011</u> .
47	Section 14-1 (Management Review) Policy Statement
47.	Section 14-1 (Management Review) Policy Statement Discussion:
	, , ,
47. 48.	Discussion:
	Discussion: Section 14-1 (Management Review) Procedure (forms included) Discussion: Section 14-1 (Management Review) Records, findings & recommendations for improvement
	Discussion: Section 14-1 (Management Review) Procedure (forms included) Discussion: Section 14-1 (Management Review) Records, findings & recommendations for improvement Review effectiveness of Management review
	Discussion: Section 14-1 (Management Review) Procedure (forms included) Discussion: Section 14-1 (Management Review) Records, findings & recommendations for improvement Review effectiveness of Management review Review of action from previous management reviews
48.	Discussion: Section 14-1 (Management Review) Procedure (forms included) Discussion: Section 14-1 (Management Review) Records, findings & recommendations for improvement Review effectiveness of Management review
48.	Discussion: Section 14-1 (Management Review) Procedure (forms included) Discussion: Section 14-1 (Management Review) Records, findings & recommendations for improvement Review effectiveness of Management review Review of action from previous management reviews Review annual reports

Revision Date: March 10, 2023 Page 5 of 8

Form 14-1-1



	<u>Discussion</u> :
	Section 14-2 (Management of Change) Procedure (forms included)
51.	Discussion:
52.	Section 14-2 (Management of Change) Records & Findings Review of Changing circumstances related to OHS Review of implemented changes & their effects
	<u>Discussion</u> :
	Review Previous Audits (Internal & External)
53.	Discussion:
	Review Work refusal situations and any related reports if any
54.	Discussion:
	Review any identified barriers to workers' reporting and participation to the HS Management System
55.	Discussion:
56.	Other Relevant Items
	Discussion:
	Annual Report

Measuring Performance (Statistics & Records)

Annual Work summaries by project:

Every project had knowledgeable Foremen/Superintendents who would monitor and track all paperwork on site. Senior management, Superintendents, Foremen, and workers continuously work together to incorporate (and improve) the newer concepts of Gazzola's Health and Safety Program.

Project A:

Leading Indicators:

Daily JHA (Gazz Cards)	Orientation	Weekly Inspections	Monthly Inspections	Tailgate Talks

Lagging Indicators:

Near	First Aid	Workplace	Vehicle	Hospital/Medical	Critical	MLTSD
Misses		Incident	Accident	Aid	Injuries	Orders

Revision Date: March 10, 2023 Page 6 of 8 Form 14-1-1

Reviewed Date: March 18, 2025



Annual Statistics & Comparison 20XX vs 20XX vs 20XX:

Moar	Firet		Vehicle	Hospital /	Critical	MLTSD
Miss		Incident				Orders
	7 1.7 4.		710010110		, ,	0.000
		l				
	Near Miss				• • • • • • • • • • • • • • • • • • •	

Trends & Recommendations: Leading:

Daily	/ JHA ((Gazz	Cards)
		•		_

Site Orientations:

Weekly Inspections:

Monthly H&S Rep/JHSC Inspections:

Tailgate talks:



	Daily Pro use Inche	ections							
	Daily Pre-use Inspections:								
	• <u>Lagging:</u>								
	Near Misses:								
	First Aid:								
	<u>Incident</u>								
	Vehicle Accident								
	Hospital / Medical Aid								
	Critical Injury								
	MLTSD Order								
Objectives for 20XX									
Based on	the annual manager	nent review and the annual rep		s have been identif	ied for 20XX:				
1.	, , , , , , , , , , , , , , , , , , ,								
2.									
3.									
4.									
5.									
Action Plan									
Item	Objective	Action	Resource	by	Target Date				
1									
2									
3									
4									
5									
				1					

Management Review

Approved by: Date:

Virgil Gazzola, Vice-President

 Revision Date: March 10, 2023
 Page 8 of 8
 Form 14-1-1

PURPOSE

Our health and safety policies, programs, systems and procedures must be reviewed upon the implementation of significant changes to ensure that it remains in compliance with current regulations and that it meets the needs of the company.

SCOPE

Where changes or new additions must be made to the existing systems and procedures, it is necessary to have a proper assessment of the changes in addition to going through the approval system to ensure that company objectives and activities are reviewed by approved personnel and distributed appropriately.

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Schedule and hold Management Health and Safety review meetings to identify actives and changes relating to Programs, Revision, Procedures, Statistics, Policies, and Follow up activities.
- Record and distribute meeting minute's and updates to the appropriate parties as required.
- Identify significant Health & Safety changes in work processes, control measures or equipment.
- Undergo an assessment of the changes and providing reports with the results of the assessment for Management review and approval.
- Identify and arrange new training needs resulting from the proposed changes.
- Create an annual report that includes summarizing and identifying changes to the Health & Safety Management System from the information reviewed and approved within each management meetings.
- 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:

- Communicate the introduction of new tasks/services or equipment with the Health & Safety
 Department to ensure a proper assessment takes place
- Direct and participate in the Management Health and Safety review meetings to identify actives and changes relating to Programs, Revision, Procedures, Statistics, Policies, and Follow up activities.
- Sign and authorize the updates as required as part of approval letters.
- 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 and provide input when requested to all distributed documentation from the system review.
- 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:

- Participate and provide input when requested to all distributed documentation from the system review.
- 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 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 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:

- 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.

PROCEDURE

The Health and Safety Coordinator shall provide Senior Management with completed packages of related health and safety material during the annual review.

The packages will include Health & Safety assessment results upon and in relation to the following:

- 1. Changes in Legal requirements including the OHSA and all applicable regulations as identified by the Evaluation of Legislative Compliance.
- 2. Significant changes made or introduction of new work processes, control measures, equipment, organization or locations as identified during assessments or on company meetings.
- 3. The introduction of new products, processes or services as directed by senior management.
- 4. New developments in the Health & Safety knowledge or technologies utilized by the Company as identified during assessments or on company meetings.
- 5. Any other change that may have a significant effect on the Health & Safety Management System.

It is the responsibility of management to ensure that approved changes are implemented, maintained and communicated to ensure a safe working environment.

When this review has been completed by Senior Management, an approval letter will be issued stating the documents reviewed, verdict and final approval signature. This will be done to meet the requirements of Section 25(2)(j) of the Occupational Health and Safety Act and to ensure all programs, policies and procedures are in line with current legislated requirements. All required changes will be integrated to the Health and Safety Manual during the annual review at the end of each calendar year, unless legislative requirements require emergency review.

With the approval letters, the **Health and Safety Coordinator** will schedule quarterly management meetings to review and identify activities and changes relating to the approval letters as well as company related statistics, investigations, reports, disciplinary actions and inspection findings with 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.

The Health and Safety Coordinator will create/revise hazard assessments and control measures assessments for all the changes approved by management when required. Any revisions to the hazard assessments (Element 2) and the controls (Element 3) as a result of identified changes will be documented during the annual review on the Annual Report.

The Health & Safety Coordinator will identify training needs coming up as a result of the changes. The Health & Safety Coordinator will arrange these trainings for the required workers. Any required training needs as a result of identified changes will be documented during the annual review on the Annual Report.

Completed and approved packages will be distributed at this time by 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 if required.

The **Health and Safety Coordinator** will use the Management Meeting Minutes Template to document the meeting content and any changes and to communicate the changes to the workforce.

Annual Approval of the Occupational Health and Safety Program and the proposed changes by Senior Management

Annually, while creating the Company's annual report, the **Health and Safety Coordinator** will ensure that the report includes all changes that were approved into the Health & Safety Management System from the information reviewed and approved within each management meetings from that year. This policy and annual report will summarize relevant changes with the goal to communicate them with the workforce.

DISTRIBUTION

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

- the **Foreman**,
- the Superintendent
- the Project Manager
- the Health and Safety Coordinator

RECORDS

All revisions made to the health and safety program will be documented through approval letters and retained on file at head office indefinitely.

COMMUNICATION

All information concerning occupational health and safety will be communicated by management and the Joint Health and Safety Committee/Health and Safety Representative on a regular basis. Management and the Joint Health and Safety Committee/Health and Safety Representative will regularly monitor each health and safety bulletin board to ensure all health and safety information is posted and updated.

All managers, supervisors and workers will be notified of the results of the review and will be orientated on the changes to the system during the Annual Company-wide Orientations.