



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.

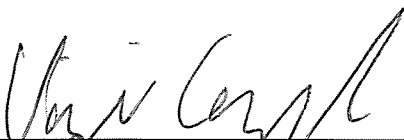
GAZZOLA PAVING LIMITED will identify situations where change is needed, that will include as a minimum:

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, General Manager

March 16, 2021

Date



GAZZOLA PAVING LIMITED Management Review Policy

The Senior Management at Gazzola Paving Limited will initiate and maintain a plan for continuous improvement of the health and safety program. The objectives of the health and safety program are as follows:

- To provide a safe and healthy working environment for all employees.
- To minimize or eliminate hazards associated with work processes.
- To minimize or eliminate damage to property and equipment.
- To ensure that the highest levels of health and safety are achieved through a comprehensive health and safety program and promotion of safety and well being of all employees.
- To reduce the number of unsafe acts and conditions, thereby reducing the number of accidents, before the annual review of the program.
- To ensure a health and safety training needs assessment is conducted.

Senior Management of Gazzola Paving Limited will prepare a written occupational health and safety program and review it annually with the joint health and safety committee. It is the responsibility of Senior Management to ensure that the program is implemented, maintained and communicated to ensure a safe working environment.

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.

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.

Recommendations that relate to well defined problems and which are logical, supported by facts, and practical, are the ones most likely to be acted upon by the employer. The joint health and safety committee should include references to the Occupational Health and Safety Act, related regulations and related standards and guidelines as much as possible when making a recommendation. Recommendations must be made in writing to the employer using the JHSC Recommendation Form or on the JHSC meeting minutes. The employer will respond within twenty-one (21) days. If the employer agrees, a timetable for implementation must be included. If the employer does not accept a recommendation the reasons must be given.

The Senior Management at Gazzola Paving Limited will ensure integration of this policy with all policies (Health & Safety, Violence & Harassment, Environmental, Return to Work) and with the Health & Safety Program in general to all aspects of the organization.

Virgil Gazzola, General Manager

March 23, 2021

Date

Section 14-1 – Management Review

PURPOSE

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

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 each 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 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;

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Project Manager Responsibilities:

- Participate and provide input when requested to all distributed documentation from the annual manual 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.

Section 14-1 – Management Review

PROCEDURE

The Health and Safety Coordinator shall provide Senior Management with completed packages of related health and safety material.

The documentation that will be reviewed includes, but is not limited to:

- Significant aspects of internal Health and Safety review and audits including COR audits
- Corrective Action Plans and their status from previous management reviews and audits
- Previous objectives and to what extent they have been met
- Assessment of the need for changes to the Health and safety policies and objectives, Safe Work Procedures
- Recommendations and Opportunities for continual improvement
 - Any updates to HS policies
 - Any updates to Environment Policy
 - Results of hazard and risk assessments
 - Workplace inspections
 - Results of performance monitoring and measurement of the Organization
 - Overall effectiveness of all elements of the HS Management System
 - 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
 - Work refusal reports
 - Results of Joint health and safety committee/Health and Safety Representative consultations and recommendations
 - New relevant legislation and evaluation of legal compliance
 - Any significant change to the circumstances of work resulting from updates to the legislation, technology or similar
 - All significant communication from external parties including (MOL, WSIB, IHSA.....etc.)
 - Any identified barriers to worker participation in the HS Management system

It is the responsibility of management to ensure that the program is 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 document 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 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.

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**

Section 14-1 – Management Review

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 Policy

Annually, the **Health and Safety Coordinator** will create an annual report summarizing and identifying trends from the information reviewed and approved within each management meetings from that year. This policy and 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 from each quarterly management meeting.

The annual report will include, but not limited to, the following:

- All updates to HS Policies
- Highlights of changes and revisions of all elements of the HS Management System
- Actions taken to remove any identified barriers to the participation of workers in the HS Management System
- New HS Objectives identified as a result of the review
- Resources required and action plan to achieve the identified objectives

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.

Section 14-1 – Management Review

Postings on each health and safety bulletin board shall be updated as necessary. Each bulletin board must be included in the monthly inspection to ensure all postings are current. All managers, supervisors and workers will be notified of the results of the review and will be orientated on the changes to the program including new objectives and action plans.

The communication program address the following:

- Review of health and safety program components.
- Injury/incident trends.
- Investigation reports.
- Claims experience reports.
- Inspection reports.
- Joint Health and Safety Committee reports.
- Early and safe return to work participant summary.
- New health and safety legislation.
- MOL inspection reports.

Section 14-2 – Management of Change

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.

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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.

The packages will include Health & Safety assessment results upon and in relation to the following:

Section 14-2 – Management of Change

1. Changes in Legal requirements including the OSHA and all applicable regulations.
2. Significant changes made or introduction of new work processes, control measures, equipment, organization or locations.
3. The introduction of new products, processes or services.
4. New developments in the Health & Safety knowledge or technologies utilized by the Company.
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.

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.

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.

Section 14-2 – Management of Change

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.