

Section 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 – 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

Section 1 – Policies and Statements

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 will be implemented:

- Health and Safety Policy
- Environmental Policy
- Visitors Policy Statement
- Workplace Violence Prevention Policy Statement
- Workplace Harassment Prevention Policy Statement
- Return to Work Policy Statement
- Fit for Duty Policy
- Management Review Policy

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, Workplace Violence Prevention Policy Statement and Workplace Harassment Prevention Policy Statement must be signed and dated by a Senior Manager of the company.

DISTRIBUTION

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

- Posted on the health and safety board
- 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.



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 their responsibility to ensure the worker's right to a safe and healthy workplace, 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. Consistent with this value, is the company's commitment to the successful recovery of injured and ill employees by assisting in their early and safe return to work through implementation of our Return to Work Program.

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.

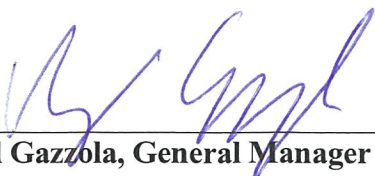
The Occupational Health and Safety Act is founded upon the Internal Responsibility System. This is a system based upon the overlapping and concurrent duties, noted below, of corporations, officers, directors, managers, supervisors and workers. At each level of our organization the employer, managers, supervisors and workers must understand their duties and responsibilities as they relate to health and safety 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.

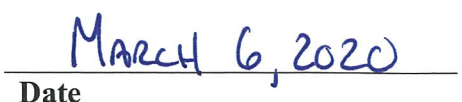
Supervisors are responsible for the health and safety of workers under their supervision and are responsible to ensure machinery, equipment and personal protective devices are safe, and in compliance with established safe practices and procedures. Supervisors will also provide employees with adequate 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, General Manager



Date



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.

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.
- Promptly correcting any practice or condition that is not in keeping with this policy.

Virgil Gazzola, General Manager

MARCH 6, 2020

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 (Working at Heights and WHMIS) 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 visitor 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).


Virgil Gazzola, General Manager

MARCH 6, 2020
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 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.

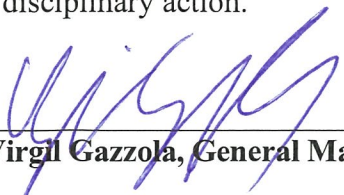
Acts of Workplace Violence can take the form of either physical contact or threat of physical contact. They may occur as a single incident or may involve a continuing series of incidents. Abuse in any form destroys worker confidence and lowers workplace morale. This in turn reduces productivity and can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

MARCH 6, 2020

Date



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 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 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.

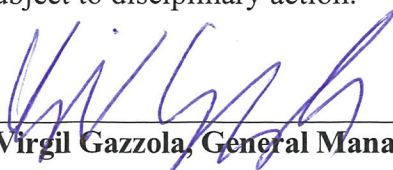
We are committed to a workplace that values people and is free from Workplace Harassment. Every employee, contractor, and/or visitor in our workplace will be treated fairly and with respect. It is the responsibility of senior management, managers, supervisors, workers, contractors and visitors to ensure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

Successful implementation of this policy will be ensured through effective planning, 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, General Manager

MARCH 6, 2020

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.

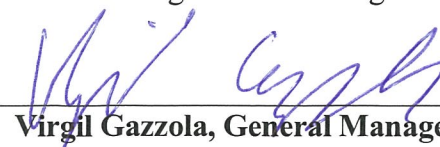
The RTW Program Coordinator will ensure regular communication exists between Worker, Supervisor and the Health Care Provider.

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.

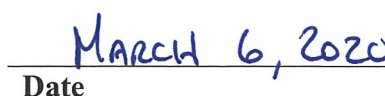
The Health Care Provider will provide medical treatment to an injured worker while adequately completing the Form 8 during the initial visit and provide the completed third page of the Form 8 to the worker. This third page represents the functional abilities information found during the assessment. Every 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.



Virgil Gazzola, General Manager



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:

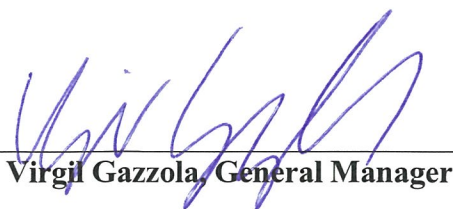
- Use, possession, offering or sale or distribution of prescription or non-prescription drugs, paraphernalia, or un-prescribed drugs for which a prescription is legally required in Canada.
- Presence in the body of prescription or non-prescription drugs for which a prescription is legally required in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

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 non-prescription 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 non-prescription 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, General Manager

MARCH 6, 2020

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.

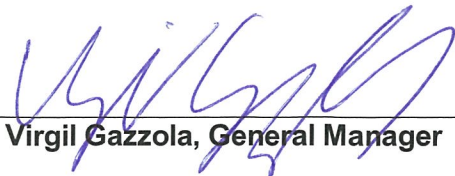
The continuous improvement plan will be based on current health and safety trends such as:

- 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



Date

1-1 Form - VISITOR'S SIGN-IN LOG

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