




# HEALTH AND SAFETY MANUAL

Bestco Construction Ltd.

Version 1

September, 2025

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## Health and Safety Policy

The senior management and management of Bestco Construction Ltd. are committed to providing a safe environment that promotes occupational health and safety. Preventing injuries and occupational illnesses at the workplace is a major objective for the organization. Bestco Construction Ltd. is committed to providing a safe workplace through effective administration, education, and training.


Bestco Construction Ltd. operates on the philosophy that the well-being of the company and clients is dependent on the health and safety of the workforce. Senior management recognizes the rights of workers to work in a safe and healthy work environment ensuring all reasonable precaution will be taken for the protection of all workplace parties. Furthermore, Bestco Construction Ltd. is committed to be in compliance with applicable Occupational Health and Safety (OHS) legal and other requirements.

Supervisors are responsible for the health and safety of workers under their supervision and responsible for ensuring that required machinery and equipment are safe to use and used in alignment with the practices and procedures specific to the equipment. Workers will receive adequate training to understand and follow these to protect the health and safety of them and those around them.

All workplace parties have the responsibility to protect their own and fellow workers' health and safety by working in compliance with the Occupational Health and Safety Act (OHSA), applicable regulations, practices and procedures and other requirements established by Bestco Construction Ltd. All workers must report incidents and hazards to prevent reoccurrences and to ensure repeating failures are rectified within the health and safety program. Detailed health and safety responsibilities for all workplace parties are addressed in "Health and Safety Responsibilities" procedure.

Bestco Construction Ltd. recognizes that a safe work environment can only be established and sustained through a united effort by all workplace parties. We are committed to work in a spirit of consultation and co-operation with relevant personnel including workers in the development and implementation of the health and safety program. The attitude and cooperation of all workplace parties in preventing accidents will assist in achieving a safe workplace.

The senior management and management of Bestco Construction Ltd. is committed to continual improvement of the Occupational Health and Safety Management System (OHSMS) and OHS performance through setting and reviewing OHS objectives. The contents of this policy, objectives, and continual improvement of the performance of the OHSMS will be reviewed at least annually by

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senior management to ensure it meets the needs of Bestco Construction Ltd. This policy will be communicated and made available to all workplace parties.




Name: Michael Zaborsky

Title: President

Company: Bestco Construction (2005) Ltd.


Sept. 2, 2025

Date: 02 September, 2025

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# Health and Safety Responsibilities Procedure


<b>Version No.</b>	<b>Reason for Revision:</b>	<b>Developed By and Date:</b>	<b>Reviewed By and Date:</b>	<b>Approved By and Date:</b>
1	To meet COR 2020 Standards, company's health and safety processes and Ontario's Health and Safety Legislative Requirements.	Emma Lisson, Health and Safety Coordinator 11 July, 2025	Michael Zaborsky and Ovidiu Cotiga, Senior Management 18 August, 2025	Michael Zaborsky, President 02 September, 2025

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## 1 Purpose

The purpose of this procedure is to identify the roles and responsibilities of all workplace parties including senior management, middle management, supervisors, workers, contractors, and other workplace parties at Bestco Construction Ltd., aligned with the legislative requirements under the Occupational Health and Safety Act, applicable Regulations and relevant Bestco Construction Ltd. policies and procedures.

## 2 Scope

The Health and Safety policy and procedure applies to all work or work-related activities performed under the control of the organization by workplace parties.

## 3 Definitions

**Action Plan:** A plan that identifies the tasks to be accomplished, assigns responsibilities for completing each task, identifies the timeline in which it is to be completed, and records the actual action taken and completion dates. [Ref. COR 2020 Audit Handbook].

**Audit:** Systematic, independent, and documented process for obtaining evidence and evaluating it objectively to determine the extent to which pre-determined criteria are fulfilled. [Ref. COR 2020 Audit Handbook].


**Competency:** A person performing a task for, or on behalf of, the organization is competent to do so by means of appropriate:

- Knowledge of the hazards and risks associated with the tasks for the operations and activities.
- Demonstrated understanding and working knowledge of the control measures associated with the hazards and risks.
- Training regarding the hazards, risks, and associated control measures
- Aptitudes, such as skillset, ability, and willingness to deal with the hazards, risks, and control measure.

[Ref. COR 2020 Audit Handbook].

**Competent Person:** A person who,

- is qualified because of knowledge, training, and experience to organize the work and its performance,
- is familiar with this Act and the regulations that apply to the work, and

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- c) has knowledge of any potential or actual danger to health or safety in the workplace.

[Ref. OHSA].

**Competent Worker:** In relation to specific work, means a worker who,

- a) is qualified because of knowledge, training, and experience to perform the work,
- b) is familiar with the Occupational Health and Safety Act and with the provisions of the regulations that apply to the work, and
- c) has knowledge of all potential or actual danger to health or safety in the work.

[Ref. O. Reg. 213/91: Construction Projects under OHSA].

**Compliance:** Meeting all requirements outlined within applicable legislation and regulations. [Ref. COR 2020 Audit Handbook].

**Conformity:** Fulfillment of a requirement. [Ref. COR 2020 Audit Handbook].

**Continual Improvement:** Recurring activity to enhance performance and achieve a measurable result. [Ref. COR 2020 Audit Handbook].

**Contractor:** A person or organization providing services to another organization in accordance with agreed upon specification, terms, and conditions. [Ref. COR 2020 Audit Handbook].


- A subcontractor is a person or organization that takes a portion of a contract from the principal contractor or another subcontractor.

**Constructor:** A person who undertakes a project for an owner and includes an owner who undertakes all or part of a project by himself or by more than one employer. [Ref. OHSA].

**Corrective Action:** Action to eliminate the cause of a non-conformity and to prevent recurrence. There can be more than one cause for a non-conformity. [Ref. COR 2020 Audit Handbook].

**Document:** Medium containing information related to the OHSMS. [Ref. COR 2020 Audit Handbook].

**Employer:** A person who employs one or more workers or contracts for the services of one or more workers and includes a contractor or subcontractor who performs work or supplies services and a contractor or subcontractor who undertakes with an owner, constructor, contractor, or subcontractor to perform work or supply services [Ref. OHSA].

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**Hazard:** Source, situation, or act with a potential for harm in terms of human injury. [Ref. COR 2020 Audit Handbook].

**Hazard Assessment:** The process of conducting a systematic review to:

- Identify hazards associated with work activities
- Analyze or evaluate the risks(s) associated with the hazards
- Determine appropriate ways to eliminate or control the hazards

[Ref. COR 2020 Audit Handbook].

**Health and Safety Representative:** A worker that brings awareness to safety concerns and facilitates communication between the constructor, supervisor, and the workers regarding safety.

At a project or other workplace where no committee is required and where the number of workers regularly exceeds five, the constructor or employer shall cause the workers to select at least one health and safety representative from among the workers at the workplace who do not exercise managerial functions.

[Ref. OHSA].

**Incident:** Work related event(s) in which an injury, fatality or occupational illness occurred; and includes event(s) where no injury or illness occurred, such as a near hit or property damage. [Ref. COR 2020 Audit Handbook].


**Joint Health and Safety Committee (JHSC):** An advisory body composed of worker and management representatives that are committed to improving health and safety conditions in the workplace. A joint health and safety committee is required at workplace,

- a) at which twenty or more workers are regularly employed;
- b) with respect to which an order to an employer is in effect;
- c) other than a construction project where fewer than twenty workers are regularly employed, with respect to which a regulation concerning designated substances applies.

This requirement does not apply to a constructor at a project at which work is expected to last less than three months.

[Ref. OHSA].

**Legal Requirements:** All applicable legislation, including but not limited to the Occupational Health and Safety Act and its regulations. [Ref. COR 2020 Audit Handbook].

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**Management:** People who have care and control over people and/or processes. [Ref. COR 2020 Audit Handbook].

- **Middle Management (Project Manager, Office Manager, etc.):** A group of managers who administers and/or supervises the affairs of a department or division at the level below senior management of the company or organization.

**Non-conformity:** Non-fulfillment of a requirement. [Ref. COR 2020 Audit Handbook].

**Occupational Health and Safety (OHS):** Conditions and factors that affect or could affect the health and safety of employees or other workers, inclusive of temporary workers and contractor personnel, visitors, suppliers, vendors, or any other person in the workplace. [Ref. COR 2020 Audit Handbook].

**Occupational Health and Safety Management System (OHSMS):** As defined in the OHSa “means a coordinated system of procedures, processes and other measures that is designed to be implemented by employers to promote continuous improvement in occupational health and safety. [Ref. COR 2020 Audit Handbook].


**OHS Objective:** OHS goal, in terms of OHS performance, that an organization sets itself to achieve. [Ref. COR 2020 Audit Handbook].

**OHS Performance:** Measurable results of an organization’s management of its OHS risks. [Ref. COR 2020 Audit Handbook].

**OHS Policy:** Overall intentions and direction of an organization related to its OHS performance as formally expressed by senior management in relation to the implementation of the OHSMS. [Ref. COR 2020 Audit Handbook].

**Organization:** Company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public, or private, that has its own functions, management, and administration. [Ref. COR 2020 Audit Handbook].

**Other Requirements:** Requirements or provisions the organization subscribes, however are not legally binding, such as industry standards. [Ref. COR 2020 Audit Handbook].

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**Owner:** Includes a trustee, receiver, mortgagee in possession, tenant, lessee, or occupier of any lands or premises used or to be used as a workplace, and a person who acts for or on behalf of an owner as an agent or delegate. [Ref. OHSA].

**Participation:** Involvement of workers, or worker representatives, in decision-making process(es) regarding the OHSMS. [Ref. COR 2020 Audit Handbook].

**Plan:** Detailed method for doing or achieving something. [Ref. COR 2020 Audit Handbook].

**Policy:** A policy is a general commitment, direction or intention and is formally stated by top management. A quality policy statement should express top management's commitment to the implementation and improvement of its management system. [Ref. COR 2020 Audit Handbook].

**Procedure:** A documented, specified method to carry out an activity. **Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].

**Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].


**Project:** a construction project, whether public or private, including,

- a) the construction of a building, bridge, structure, industrial establishment, mining plant, shaft, tunnel, caisson, trench, excavation, highway, railway, street, runway, parking lot, cofferdam, conduit, sewer, watermain, service connection, telegraph, telephone or electrical cable, pipe line, duct or well, or any combination thereof,
- b) the moving of a building or structure, and
- c) any work or undertaking, or any lands or appurtenances used in connection with construction.

[Ref. OHSA].

**Record:** Document stating results achieved or providing evidence of activities performed. [Ref. COR 2020 Audit Handbook].

**Responsibilities:** Responsibilities and accountabilities of workplace parties ensures a commitment by the employer, supervisors, and workers, towards providing a safe and healthy work environment.

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**Senior Management (Company President, Vice President of Operations) -**

**Employer's Representative:** Person(s) at the highest level of an organization's structure responsible for leading, managing and /or directing an organization's day-to-day activities and/or operations. [Ref. COR 2020 Audit Handbook].

**Supervisor:** A person who has charge of a workplace or authority over a worker. [Ref. OHSA].

**Supplier:** A person who supplies any machine, device, tool, or equipment under any rental, leasing, or similar arrangement for use in or about a workplace. [Ref. OHSA].

**Worker:** Any of the following, but does not include an inmate of a correctional institution or like institution or facility who participates inside the institution or facility in a work project or rehabilitation program:

- a) A person who performs work or supplies services for monetary compensation.
- b) A secondary school student who performs work or supplies services for no monetary compensation under a work experience program authorized by the school board that operates the school in which the student is enrolled.
- c) A person who performs work or supplies services for no monetary compensation under a program approved by a college of applied arts and technology, university, private career college or other post-secondary institution.
- d) Such other persons as may be prescribed who perform work or supply services to an employer for no monetary compensation.


[Ref. OHSA].

**Workplace:** any land, premises, location, or thing at, upon, in or near which a worker works. [Ref. OHSA].

**Workplace Parties:** Includes, but is not limited to, the employer, supervisor(s), workers, constructor, visitors, and owner. [Ref. COR 2020 Audit Handbook].

## 4 Roles and Responsibilities


Responsibilities and accountabilities of workplace parties ensures a commitment by workplace parties ensuring a safe and healthy work environment. The responsibilities of workplace parties are outlined as per the Organization Chart and listed below with the specific roles within the organization.

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#### 4.1. Senior Management

- Provide a safe and healthy work environment.
- Ensure that equipment, materials, and protective devices provided are maintained in good working condition.
- Provide information, instruction, and supervision to workers to protect their health and safety.
- Appoint competent personnel as supervisors.
- Make sure supervisors and workers are aware and/or informed of potential or actual hazards.
- Assist the Joint Health and Safety Committee (JHSC) and/or health and safety representative(s) (if applicable) to carry out their functions.
- At least annually, prepare and review a written Occupational Health and Safety Policy and ensure a copy of the current policy is posted in a conspicuous place.
- Develop and maintain a program to implement the health and safety policy.
- Work jointly with relevant workplace parties in the development and implementation of the program.
- Respond in a timely manner to recommendations made by the JHSC and/or health and safety representative(s).
- Support the process of ongoing hazard assessment.
- Participate in the development and review of job hazard analysis, safe work practices and safe job procedures.
- Promote the exchange of health and safety information.
- Delegate authority and responsibility as appropriate and hold workplace parties accountable for the authority and responsibility delegated to them.
- Review accident reports and respond in a timely manner.
- Conduct an investigation when required.
- Review health and safety trends and develop yearly action plans based on the trends.
- Conduct a formal inspection of a site at least once a year.
- Allocate the necessary resources towards the planning and execution of OHSMS internal audits.
- Ensure commitment to be in compliance with applicable OHS legal and other requirements such as standards, guidelines or manufacturer's instructions.
- Ensure conformity to the legal, other and OHSMS requirements.
- Set and review OHS objectives.



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- Ensure continual improvement is made to the OHSMS and OHS performance.
- Take every precaution reasonable in the circumstances for the protection of a worker.

#### 4.2. Owners

The owner of a workplace that is not a project shall,

- Ensure facilities are provided and maintained as prescribed.
- Ensure workplace complies with all applicable regulations.
- Ensure no workplace is constructed, developed, reconstructed, altered, or added to except in compliance with the Act and the regulations.
- Keep a copy of the drawings in a convenient location at or near the workplace.
- Provide copies of drawings to Director or Inspector, Ministry of Labour, Immigration, Training and Skills Development (MLITSD) upon request.
- Ensure access to a washroom is provided, on request, to a worker who is present at the workplace to deliver anything to the workplace, or to collect anything from the workplace for delivery elsewhere, unless if there is an exception based on the Act.


#### 4.3. Project Owners

- Determine whether any designated substances are present at the project site.
- Prepare a list of all designated substances that are present at the site.
- Complies with the construction regulations and other regulations, if applicable.

#### 4.4. Constructor

- Ensure the measures and procedures prescribed in the Act and regulations are carried out on the project.
- Ensure every employer and every worker performing work on the project complies with this Act and the regulations.
- Ensure the health and safety of workers on the project is protected.
- Ensure each contractor is provided with a list of all designated substances present at the site before beginning work.




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- Provide a Notice of Project to the Director, MLITSD and ensure it is posted in a conspicuous location before commencing any work on a project, as prescribed.

#### **4.5. Middle Management (Project Manager, Office Manager, etc.)**


- Ensure that supervisors understand their health and safety responsibilities and are held accountable.
- Ensure that equipment, materials, and protective devices provided are maintained in good working condition.
- Ensure the workforce is adequately trained to safely complete the work and deal with hazards.
- Ensure that training is current and regularly reviewed.
- Be aware of applicable legislation and ensure compliance.
- Support the process of ongoing hazard assessment.
- Participate in the development and review of job hazard analysis, safe work practices and safe job procedures.
- Ensure there is an effective mechanism for co-operative problem solving amongst workers and supervisors.
- Take unresolved health and safety problems to senior management as required.
- Respond appropriately to reports of problems and to JHSC/Health and Safety Representative recommendations.
- Ensure job hazard analysis, safe work practices and safe job procedures are established so that supervisors can maintain a safe and healthy workplace.
- Participate in the development, implementation and review of the health and safety program.
- Monitor supervisors' toolbox talks as required.
- Review accident/incident reports.
- Ensure corrective actions are implemented and effective.
- Conduct a formal inspection of a job site quarter-yearly.
- Conduct analysis of health and safety statistics to identify trends and coordinate the conduct of root cause analysis to establish suitable corrective actions.
- Report quarterly to senior management on the status of health and safety performance.

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- Delegate authority and responsibility as appropriate and hold supervisors, workers, and contractors accountable for the authority and responsibility delegated to them.

#### 4.6. Supervisors


- Be aware of the applicable legislation and Bestco Construction Ltd. policies and procedures.
- Ensure that workers use or wear the equipment, protective devices, or clothing that Bestco Construction Ltd. requires to be used or worn and that it is in good condition.
- Ensure that workers receive appropriate training to use or wear the equipment, protective devices, or clothing that Bestco Construction Ltd. requires.
- Participate in the development and review of job hazard analysis, safe work practices and procedures.
- Maintain job hazard analysis, safe work practices and safe job procedures to ensure that workers can carry out safe and healthy work.
- Conduct project specific job hazard assessment prior to a project and Pre-job Safety Assessment (PSA) daily and review them with workers.
- Ensure that workers comply with the OHSA, applicable regulations and the Bestco Construction Ltd. policies, procedures, and program.
- Ensure that workers are aware of potential or actual hazards and have dealt with or are dealing with the actual hazards in the workplace.
- Plan and communicate clear and precise work assignments to enable workers to produce safely.
- If possible, involve workers in work planning and problem solving.
- Provide orientation to new crew members.
- Conduct weekly toolbox talks and weekly site inspections.
- Review safety aspects of each task with crew.
- Conduct accident or incident investigations as soon as possible.
- Encourage workers to report health and safety problems without fear of reprisal.
- Respond quickly and appropriately to worker concerns and if possible, cooperate in their correction. Escalate the issue to the next level if beyond supervisor's authority/ability.
- Report safety problems to middle management.

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- Set an example by being consistently safety conscious and insisting on the safe performance of work.
- Observe the work in progress and provide positive feedback to the workers.
- Ensure sites conform to the legal and OHSMS requirements.
- Take every precaution reasonable in the circumstances for the protection of workers.

#### 4.7. Workers

- Work in a way that will not endanger themselves or others.
- Understand the hazards associated with their tasks and the controls in place to mitigate them. If in doubt, seek the advice of the supervisor (Right to Know).
- Participate in Pre-job Safety Assessment (PSA) daily.
- Participate in solving health and safety problems and provide recommendations to the supervisor to improve health and safety (Right to Participate).
- Exercise the right to refuse to do work that the employee or worker believes is unsafe in accordance with the procedure set out in the applicable provincial health and safety legislation (Right to Refuse).
- Use or wear the equipment, protective devices and/or clothing based on legislation and/or the Bestco Construction Ltd. safe work practices and safe job procedures.
- Immediately report unsafe conditions and/or existence of any unidentified hazard to the supervisor.
- Report all accidents, injuries, first aid and near-misses immediately to the supervisor.
- Do not perform any task for which they are not competent.
- Work safely in accordance with Bestco Construction Ltd. and/or the client's health and safety policy and program and with the OHSA and applicable regulations.
- Ensure pre-use inspections for equipment are completed as required prior to using the equipment.
- Do not remove, displace, or interfere with the use of any safeguards.
- Refrain from engaging in any prank, feat of strength, unnecessary running and/or rough and boisterous conduct.
- Advise other workers of unsafe conditions or work practices.

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#### 4.8. Contractor

- Before commencing work, ensure work is carried out in compliance with the Bestco Construction Ltd. health and safety policy and program.
- Provide the contractor's workers training as per requirements of the site safety policy and program and ensure the records are readily available.
- Coordinate all work activities through the supervisor.
- Provide, inspect, and maintain equipment and protective devices as required.
- Monitor site conditions daily and report/record all hazards, injuries, accidents, and near-misses.
- Cooperate in accident investigations.
- Conduct clean-up of work areas at least daily, based on the contract.
- Conduct regular safety talks for the contractor's employees and provide site-specific training as required.
- Participate in health and safety activities as required.


#### 4.9. Joint Health and Safety Committee (JHSC) - Office (If Applicable)

- Conduct JHSC meetings at least once every three months.
- Conduct a monthly inspection of the workplace to identify hazards (worker member responsibility).
- Collate findings of inspections and incident investigations.
- Make written recommendations to senior management if necessary.
- Provide insight and suggestions to senior management for a safer work environment.
- Support the implementation and maintenance of the OHSMS.
- Assist senior management in the annual review of the Bestco Construction Ltd. health and safety program.
- Investigate cases of reported hazards, injuries, near-misses as required.
- Participate in occupational hygiene testing as required.

#### 4.10. Joint Health and Safety Committee (JHSC) – Site (If Applicable)

A site-JHSC is only applicable for construction projects where 20 or more workers are regularly employed and is expected to last three months or more. A site JHSC has the following responsibilities:

- Conduct JHSC meetings at least once every three months.

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- Conduct a monthly inspection of the workplace to identify hazards (worker member responsibility).
- Collate findings of inspections and incident investigations.
- Make written recommendations to site management if necessary.
- Provide insight and suggestions to site management for a safer work environment.
- Support the implementation and maintenance of the OHSMS.
- Assist senior management in the annual review of the Bestco Construction Ltd. health and safety program.
- Investigate cases of reported hazards, injuries, near-misses as required.
- Participate in occupational hygiene testing as required.

#### **4.11. Health and Safety Representative**


At a project or other workplace where no committee is required and where the number of workers regularly exceeds five, the constructor or employer shall cause the workers to select at least one Health and Safety Representative from among the workers at the workplace who do not exercise managerial function. The Health and Safety Representative has the following responsibilities:

- Inspect the workplace monthly to identify hazards.
- Report hazards and make written recommendations to senior management.
- Attend and participate in health and safety meetings.
- Assist in the review of the health and safety program.
- Help to implement the health and safety program.
- Assist in accident/incident investigation.
- Investigate cases of reported hazards, injuries, near-misses as required.
- Participate in occupational hygiene testing as required.

#### **4.12. Suppliers**

Every person who supplies any machine, device, tool, or equipment under any rental, leasing, or similar arrangement for use in or about a workplace shall ensure:

- that the machine, device, tool, or equipment is in good condition.
- that the machine, device, tool, or equipment complies with the Act and the regulation.

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- if it is the person's responsibility under the rental, leasing, or similar arrangement to do so, that the machine, device, tool, or equipment is maintained in good condition.

#### 4.13. Visitors and Other Service Providers

- Comply with Bestco Construction Ltd. and site-specific rules and regulations.
- Participate in orientations as required.

## 5 Related Documents/Forms

- Organization Chart
- BESTCO-PRO-01.2-Document and Record Control Procedure

## 6 Document and Record Maintenance


Documents and Records are maintained as per **BESTCO-PRO-01.2-Document and Record Control Procedure**.

## 7 Record Retention

Records are to be retained for a minimum of 3 years. Records will remain legible and readily identifiable.

## 8 Legislated/Other References

- Duties of constructors – Occupational Health and Safety Act, s. 23
- Duties of employers – Occupational Health and Safety Act, s. 25, 26
- Duties of supervisors – Occupational Health and Safety Act, s. 27
- Duties of workers – Occupational Health and Safety Act, s. 28
- Health and Safety Representative – Occupational Health and Safety Act, s. 8
- Joint Health and Safety Committee – Occupational Health and Safety Act, s. 9
- Duties of Owners – Occupational Health and Safety Act, s. 29
- Duties of Project Owners – Occupational Health and Safety Act, s. 30
- Duties of Suppliers - Occupational Health and Safety Act, s. 31
- Duties of Directors and Officers of a Corporation - Occupational Health and Safety Act, s. 32
- O. Reg. 213/91: Construction Projects under Occupational Health and Safety Act

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- IHSA COR™ 2020 Guidelines

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# Document and Record Control Procedure

<b>Version No.</b>	<b>Reason for Revision:</b>	<b>Developed By and Date:</b>	<b>Reviewed By and Date:</b>	<b>Approved By and Date:</b>
1	To meet COR 2020 Standards, company's health and safety processes and Ontario's Health and Safety Legislative Requirements.	Emma Lisson, Health and Safety Coordinator 11 July, 2025	Michael Zaborsky and Ovidiu Cotiga, Senior Management 18 August, 2025	Michael Zaborsky, President 02 September, 2025



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## 1 Purpose

The Document and Record Control Procedure sets the framework for how documents and records are tracked, managed, secured and stored within a centralized system to assist with accuracy and due diligence at Bestco Construction Ltd.

## 2 Scope

The Document and Record Control Procedure applies to all documentation that is key component of the Occupational Health and Safety Management System (OHSMS) at Bestco Construction Ltd.

## 3 Definitions

**Document:** Medium containing information related to the OHSMS. [Ref. COR 2020 Audit Handbook].

**Legal Requirements:** All applicable legislation, including but not limited to the Occupational Health and Safety Act and its regulations. [Ref. COR 2020 Audit Handbook].

**Occupational Health and Safety Management System (OHSMS):** As defined in the OHSA “means a coordinated system of procedures, processes and other measures that is designed to be implemented by employers to promote continuous improvement in occupational health and safety. [Ref. COR 2020 Audit Handbook].

**Other Requirements:** Requirements or provisions the organization subscribes, however are not legally binding, such as industry standards. [Ref. COR 2020 Audit Handbook].

**Policy:** A policy is a general commitment, direction or intention and is formally stated by top management. A quality policy statement should express top management's commitment to the implementation and improvement of its management system. [Ref. COR 2020 Audit Handbook].

**Procedure:** A documented, specified method to carry out an activity. **Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].

**Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].

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**Record:** Document stating results achieved or providing evidence of activities performed.  
[Ref. COR 2020 Audit Handbook].

## 4 Procedure

### 4.1. Documents and Records

The creation, collection, retention and distribution of documents and records shall comply with all applicable legal requirements, collective agreements, organizational policies, and other requirements, as required.

The controlled OHSMS documents at Bestco Construction Ltd. include internally generated documents, such as:

- Health and Safety Policies, Procedures and Programs
- Job Hazard Analyses
- Control Procedures (Safe Work Practices and/or Safe Job Procedures)

Other documents of external origin that are necessary for the planning and operation of OHSMS, such as:

- The Occupational Health and Safety Act
- Regulations pertaining to relevant Occupational Health and Safety legislation under the Occupational Health and Safety Act
- Regulations pertaining to relevant Occupational Health and Safety legislation under other Ontario Acts (Workplace Safety and Insurance Act, Highway Traffic Act, Accessibility for Ontarians with Disabilities Act, etc.)
- Manufacturer's Instructions
- Canadian Safety Association Standards (CSA Standards)
- Other applicable industry standards and guidelines, if applicable

The health and safety records at Bestco Construction Ltd. include, but are not limited to:

- Training records
- Meeting agendas, minutes, and communications
- Inspection (Workplace and pre-use) reports
- Equipment Maintenance records

Documents that are necessary for the effectiveness of the OHSMS are listed in **Master Documented Information List** and maintained by the Document Controller. Records are collected as per the requirement of documents.

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#### 4.2. Document Development

Internally issued OHSMS documents generally include policies, procedures, manuals, and job hazard analyses. When the need for a new document has been identified, management will assign a subject matter expert(s) as either the author (Developed By) or reviewer (Reviewed By) of the required documents.

The following steps are undertaken to develop, review, approve, distribute, control, update, re-approve and withdraw internal OHSMS documents.

1. Authors will prepare the first draft and send it to the reviewers.
2. The reviewers will provide written feedback to the author.
3. Authors will address feedback and submit a second draft to the reviewers.
4. Reviewers will provide additional written comments to the author, if required.
5. Steps 2-3 are repeated until all comments are addressed and both parties are satisfied.
6. Authors and/or reviewers can apply a "Withdraw" to a document with formal request.
7. Once all comments have been addressed, the document will be submitted to the management for final review (Approved By) and signatures, as appropriate.
8. Reapprovals will be taken place as necessary. The same steps above shall be followed.
9. All approved documentation should thereafter be submitted to the Document Controller for updating the **Master Documented Information List**.

#### 4.3. Document Identification and Coding

The Document Controller will ensure that all documents are given a name and number that is relevant to their use. The document name and number are the unique method by which documents and records are tracked and should not be changed with each revision.

#### 4.4. Document Formatting

All internal documents must contain the following elements:

- Document Name
- Document Number
- Name of the author(s) with their title, clearly stated (*Developed By*)
- Name of the reviewer(s) with their title, clearly stated (*Reviewed By*)
- Name of the approver(s) with their title, clearly stated (*Approved By*)
- Effective Date

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- Version Number
- Page number indicating total number of pages
- Company Logo

#### 4.5. Document Review

Document review refers to the process where persons with the appropriate subject matter knowledge contribute to the development and improvement of pre-existing internal documents. The OHSMS documents are reviewed and updated annually (or as per their review cycle) and revised to ensure continued suitability and compliance with the relevant legislation and standards where necessary. Changes to, and current revision status of, documents are identified and tracked in the **Master Documented Information List**.

#### 4.6. Document Approval and Authorization

All documents generated by Bestco Construction Ltd. as part of the OHSMS will be reviewed and approved for use by designated members of management through authorizing signatures prior to distribution and issuance.

#### 4.7. Document Availability

Document controller shall ensure relevant versions of applicable documents are readily available at a central location, specified in the **Master Documented Information List**. Managers and supervisors shall ensure that the documents are readily available to all their workers.

#### 4.8. Document Release and Distribution

Management is responsible for ensuring that all internally issued documents forming the OHSMS are readily available. The Document Controller will notify all personnel via email of document updates and will maintain a copy of the notification. It is the responsibility of affected workplace parties to ensure that all hard and/or electronic copies of documents in their possession are accurate and up to date.

#### 4.9. Obsolete Documents

When documents become outdated, the Document Controller will remove obsolete versions from circulation. The obsolete document will be marked as "Obsolete" in the document name. The Document Controller will notify all relevant workplace parties to dispose of electronic and physical copies of the obsolete documents to

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prevent their unintended use. Document Controller will maintain a copy of the notification.

#### 4.10. External Documents

Documents of external origin that are referenced in the implementation of the OHSMS at Bestco Construction Ltd. may include any applicable Federal and Provincial Legislation (e.g., Occupational Health and Safety Act), national and international standards (e.g., CSA, ANSI, ISO, etc.), and manufacturers' guidelines. The external documents will be reviewed for context to determine their applicability in the OHSMS at Bestco Construction Ltd. This review will be conducted by the author of the relevant internal document in which the external document is going to be referenced.

When applicable, the identified external documents such as Legislation, national/international standards and manufacturers' guidelines will be controlled by documenting, as necessary, the title, document number (if any), the most recent revision/edition, and year of publication. The Document Controller will maintain a list of all controlled external documents and review the list annually to determine if any updated documents are available. If applicable, the obsolete external document referenced will be removed from the list and replaced with the updated external document information.

#### 4.11. Identification of Records

Every health and safety record at Bestco Construction Ltd. is identified with the following information:

- Record type name/description (e. g. WHMIS training for worker X)
- Subject reference as applicable (records should identify the product, person, or event to which they pertain) (e. g. 4S issued WHMIS training certificate)
- Date (The date that the data was recorded) (e.g. dd-mm-yyyy)
- Status of the item (dependent on the record itself) (e. g. active or expired)

#### 4.12. Storage and Access of Records

The health and safety records may be stored either physically or in electronic form. All health and safety records will be readily accessible and available to the individuals requiring information contained in the records.

#### 4.13. Retention of Records

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Health and safety records are retained for a minimum of 3 years for business purposes and otherwise defined by the relevant external authorities and applicable legislation. This is to demonstrate conformity to the requirements of Bestco Construction Ltd. OHSMS.

#### **4.14. Disposal of Records**

Physical records are disposed of using the appropriate method based on the nature of the record. Electronic records are deleted in a manner to prevent unwanted retrieval by a third party.

#### **4.15. Legibility of Records and Documents**

Health and safety records and documents shall be written or printed in a manner that ensures that the data is accurate, complete, and legible and can be read and understood by all workplace parties. All personnel developing records must write legibly and the importance of this matter will be communicated prior to starting work and on an ongoing basis. Supervisors and Senior Management will ensure all reports are legible at the time of collection and retention.

#### **4.16. Maintaining Confidentiality and Privacy**

We recognize that all workplace parties have the right to access documents and records relevant to their health and safety, while respecting the need for confidentiality. All relevant health and safety documentation will be available to the relevant workplace parties upon request.

## **5 Roles and Responsibilities**

Roles and Responsibilities ensures a commitment by workplace parties. The responsibilities of workplace parties are outlined as per the Organization Chart and listed below with the specific roles within the organization.

### **5.1. Senior Management**

- Ensure that the Document and Record Control Procedure is implemented in the organization.
- Review and approve all internal and external documentation and records.
- Ensure that the documents are readily available to all relevant workplace parties.



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- Ensure that a process is in place to maintain and store health and safety records.
- Appoint document reviewers and controller as required.

## 5.2. Document Controller

- The administration of the document management process, updating document numbering, versions, revision histories.
- Maintenance of the **Master Documented Information List**.
- Ensuring only approved documents are disseminated, and obsolete versions are retained as records or disposed of.

## 5.3. Managers/Supervisors

- Provide feedback or changes required to existing documentation to the Document Controller.
- Ensure that the applicable version of all documents is available.
- Participate in the annual review of all documentation and records as necessary.

## 5.4. Workers

- Notify supervisors/managers when an error is found in any of the internal and external documentation.

# 6 Related Documents/Forms

- Master Documented Information List

# 7 Document and Record Maintenance

Documents and Records are maintained as per **BESTCO-PRO-01.2-Document and Record Control Procedure**.

# 8 Record Retention


Records are to be retained for a minimum of 3 years. Records will remain legible and readily identifiable.

# 9 Legislated/Other References



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- ISO 45001:2018 standard
- IHSA COR™ 2020 Guidelines

	BESTCO-PLY-02.0	Effective Date: 02 Sept, 2025
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## Hazard Assessment, Analysis and Control Policy

Hazard assessment, analysis and control is a critical component to Bestco Construction Ltd.'s Occupational Health and Safety Management System. We are committed to the ongoing and proactive identification of health and safety hazards, assessing the risks associated with the hazards, and defining and implementing controls to mitigate the risks. The goal of this program is to eliminate or reduce the risk of hazards in the workplace through the implementation of effective controls in a timely manner. This Policy shall be accompanied by the Hazard Assessment, Analysis and Control Procedure.

Hazard assessments will be developed using the RACE (Recognize, Assess, Control, Evaluate) methodology, and will be in compliance with the Occupational Health and Safety Act and all applicable regulations. Senior Management is committed to providing the necessary budget, time, and resource for ensuring the implementation of the Hazard Assessment, Analysis and Control Program.

All employees are required to review and acknowledge the Job Hazard Assessments to understand the hazards and risks associated with their tasks and the controls in place to mitigate them.

The program and its performance shall be reviewed annually for sustainability, adequacy, and effectiveness.




Name: Michael Zaborsky

Title: President

Company: Bestco Construction (2005) Ltd.


Sept. 2, 2025

Date: 02 September, 2025

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# Hazard Assessment, Analysis, and Control Procedure

<b>Version No.</b>	<b>Reason for Revision:</b>	<b>Developed By and Date:</b>	<b>Reviewed By and Date:</b>	<b>Approved By and Date:</b>
1	To meet COR 2020 Standards, company's health and safety processes and Ontario's Health and Safety Legislative Requirements.	Emma Lisson, Health and Safety Coordinator 11 July, 2025	Michael Zaborsky and Ovidiu Cotiga, Senior Management 18 August, 2025	Michael Zaborsky, President 02 September, 2025

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## 1 Purpose

Hazard assessment, analysis and control is a critical component to Bestco Construction Ltd.'s Occupational Health & Safety Management System (OHSMS). The purpose of this procedure is to outline the requirement to establish, implement and maintain a process to identify Occupational Health and Safety (OHS) hazards, assess risks and outline controls to mitigate the risks posed by the hazards.

## 2 Scope

This policy and procedure apply to the requirement to conduct hazard assessments for all operations, including routine and non-routine, and human factors where work is performed at Bestco Construction Ltd. This will also cover the requirement to conduct risk assessment for identified hazards:

- Proactively prior to commencement to tasks.
- When equipment, material, substance, or process is introduced or changed.
- When a change to the OHSMS may impact workplace operations or activities.

## 3 Definitions

**Competency:** A person performing a task for, or on behalf of, the organization is competent to do so by means of appropriate:

- a) Knowledge of the hazards and risks associated with the tasks for the operations and activities.
- b) Demonstrated understanding and working knowledge of the control measures associated with the hazards and risks.
- c) Training regarding the hazards, risks, and associated control measures
- d) Aptitudes, such as skillset, ability, and willingness to deal with the hazards, risks, and control measure.


[Ref. COR 2020 Audit Handbook].

**Competent Person:** A person who,

- a) is qualified because of knowledge, training, and experience to organize the work and its performance,
- b) is familiar with this Act and the regulations that apply to the work, and
- c) has knowledge of any potential or actual danger to health or safety in the workplace.

[Ref. OHSA].

**Competent Worker:** In relation to specific work, means a worker who,

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- a) is qualified because of knowledge, training, and experience to perform the work,
  - b) is familiar with the Occupational Health and Safety Act and with the provisions of the regulations that apply to the work, and
  - c) has knowledge of all potential or actual danger to health or safety in the work.
- [Ref. O. Reg. 213/91: Construction Projects under OHSA].

**Document:** Medium containing information related to the OHSMS. [Ref. COR 2020 Audit Handbook].

**Hazard:** Source, situation, or act with a potential for harm in terms of human injury. [Ref. COR 2020 Audit Handbook].

**Hazard Assessment:** The process of conducting a systematic review to:

- Identify hazards associated with work activities
- Analyze or evaluate the risks(s) associated with the hazards
- Determine appropriate ways to eliminate or control the hazards

[Ref. COR 2020 Audit Handbook].


**Hazardous Material:** means a biological or chemical agent named or described in the regulations as a hazardous material [Ref. OHSA].

**Hazardous Physical Agent:** A physical agent named or described in the regulations as a hazardous physical agent [Ref. OHSA].

**Occupational Health and Safety (OHS):** Conditions and factors that affect or could affect the health and safety of employees or other workers, inclusive of temporary workers and contractor personnel, visitors, suppliers, vendors, or any other person in the workplace. [Ref. COR 2020 Audit Handbook].

**Occupational Health and Safety Management System (OHSMS):** As defined in the OHSA “means a coordinated system of procedures, processes and other measures that is designed to be implemented by employers to promote continuous improvement in occupational health and safety. [Ref. COR 2020 Audit Handbook].

**Policy:** A policy is a general commitment, direction or intention and is formally stated by top management. A quality policy statement should express top management's commitment to the implementation and improvement of its management system. [Ref. COR 2020 Audit Handbook].

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**Procedure:** A documented, specified method to carry out an activity. Process: A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].

**Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].

**Project:** a construction project, whether public or private, including,

- the construction of a building, bridge, structure, industrial establishment, mining plant, shaft, tunnel, caisson, trench, excavation, highway, railway, street, runway, parking lot, cofferdam, conduit, sewer, watermain, service connection, telegraph, telephone or electrical cable, pipe line, duct or well, or any combination thereof,
- the moving of a building or structure, and
- any work or undertaking, or any lands or appurtenances used in connection with construction.

[Ref. OHSA].

**Record:** Document stating results achieved or providing evidence of activities performed. [Ref. COR 2020 Audit Handbook].

**Residual Risk:** Combination of the likelihood of the occurrence after the hierarchy of controls has been implemented for an identified hazard [Ref. COR 2020 Audit Handbook].

**Risk:** Combination of the likelihood of an occurrence of a hazardous event or exposure(s) and the severity of injury or occupation illness that can be caused by the event or exposure(s). [Ref. COR 2020 Audit Handbook].


**Risk Assessment:** Process of evaluating the risk(s) arising from a hazard(s), taking into account the adequacy of any existing controls, and deciding whether or not the risk(s) is acceptable. [Ref. COR 2020 Audit Handbook].

**Workplace:** any land, premises, location, or thing at, upon, in or near which a worker works. [Ref. OHSA].

**Workplace Parties:** Includes, but is not limited to, the employer, supervisor(s), workers, constructor, visitors, and owner. [Ref. COR 2020 Audit Handbook].

## 4 Procedure

### 4.1. RACE Method

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The design and development of the hazard assessment process shall follow the Recognize, Assess, Control, and Evaluate (RACE) method:

- **Recognize** where there are potential hazards in the workplace.
- **Assess** the level of risk for each hazard.
- **Control** the hazards by looking for ways to get rid of the hazard or to make the job safer.
- **Evaluate** the implemented controls to determine if you have adequately eliminated or controlled the hazard.

#### 4.2. Job Hazard Assessment

The RACE method allows hazard identification and risk assessment to be proactive rather than reactive. Using the RACE method, Bestco Construction Ltd. maintains three levels of hazard assessments, as described below:

(a) Job Hazard Analysis (JHA) Library:

A JHA Library is initially developed by Bestco Construction Ltd. and shall be modified as required. The JHA library is an overall hazard assessment of all operations, including routine and non-routine, and human factors where work is performed within Bestco Construction Ltd., and is the primary tool that will be utilized in this process. Bestco Construction Ltd. will develop and maintain a JHA Library, using a team-based approach. A **JHA Form** will be completed for each task.

(b) Project Specific JHA:

The Project Specific JHA covers the entire scope of a project and shall be developed prior to the commencement of any work for that project. The Project Specific JHA shall be developed by the project manager/site supervisor for each project using the Project Specific JHA Tool. The project manager/site supervisor may use the support of relevant workplace parties inclusive of workers, subcontractors, etc. who have knowledge of specific tasks, and management to review and approve as required.

Project Specific JHAs are developed using the JHA tasks already captured and approved in the JHA Library.

For any task not included in the JHA Library, the project manager/site supervisor will create a new JHA task following the procedure outlined in General JHA Development Procedure (Refer to section 4.6) and using the



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**JHA Form.** Once completed, the tasks will be reviewed and approved by management related to the specific project.

(c) Pre-Job Safety Assessment (PSA):

The daily hazard assessment covers the scope of work to be performed on site that day and shall be conducted prior to the commencement of tasks. The site supervisor shall perform a daily hazard assessment using the **PSA Form**.

Throughout the day, if there are any changes to the work plan or if a worker identifies a new hazard, the site supervisor shall document these changes (including how they were dealt with) on the **PSA Form**.

#### 4.3. Development and Updates to Job Hazard Assessments

A Job Hazard Assessment should be conducted, reviewed, or updated on the following occasions:

- Establishment of the JHA Process
- During changes from normal operation/when the phase of the project changes
- New or modified process/installation
- Changes in raw materials, chemicals, etc.
- During expansion, contraction, restructuring
- New or modified legislation
- New information/inputs from interested parties,
- Changes to the OHSMS may impact workplace operations or activities
- After incidents/incident investigations.


#### 4.4. JHA Team

JHAs will be developed using a team-based approach, led by a member of management. The JHA team will be comprised of competent workplace parties which may include the following individuals:

- Senior Management
- Middle Management (Project Managers and other facility managers)
- Supervisors
- Workers with knowledge of the specific tasks

The following personnel may be added to team or consulted:

- Health & Safety Professional

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- Joint Health and Safety Committee (JHSC) members, health and safety representatives, as applicable
- Employee(s) with technical knowledge of the activity/job (technical support, engineering expertise, maintenance)
- Owner(s), Constructor(s), Contractor(s), Supplier(s), Maintenance Department/Personnel, Consultants, Professional Engineer(s) (If Applicable).

The JHA team will be formed based on, and vary with, the complexity of the activity/job. Project Specific JHAs are completed in the same manner as JHAs.

#### 4.5. Competencies

The competency of workplace parties involved with the hazard assessment, analysis and control process should include:

- a) knowledge of the hazards and risks associated with the tasks for the operations and activities
- b) demonstrated understanding and working knowledge of the control measures associated with the hazards and risks
- c) training with regard to the hazards, risks and associated control measures
- d) aptitudes, such as skillset, ability, and willingness to deal with the hazards, risks, and control measures

Management will ensure the Required Competencies for conducting Job Hazard Assessment checklist is completed before appointing the JHA Development team members.



PSAs are conducted by site supervisors with the participation of workers who are competent to perform the daily tasks.

#### 4.6. General JHA Procedure

##### (a) Step 1: Hazard Identification

The JHA team shall identify all tasks, routine and non-routine and human factors, performed at Bestco Construction Ltd., along with the job steps required to complete each task. The following information should be considered:

- How work is organized.

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- Human factors (including workload, work hours, victimization, harassment, and bullying), leadership and the culture in the organization.
- Routine and non-routine activities and situations, including hazards arising from:
  - infrastructure, equipment, materials, substances, and the physical conditions of the workplace.
  - product and service design, research, development, testing, production assembly, construction, service delivery, maintenance, and disposal.
  - human factors.
  - how the work is performed.
- Past relevant incidents, internal or external to the organization, including emergencies, and their causes.
- Potential emergency situations.
- People, including consideration of:
  - those with access to the workplace and their activities, including workers, subcontractors, visitors, and other persons.
  - those in the vicinity of the workplace who can be affected by the activities of the organization.
  - workers at a location not under the direct control of the organization.
- Other factors, including consideration of:
  - the design and layout of work areas, ergonomics, processes, installations, machinery/equipment, operating procedures, and work organization, including their adaptation to the needs and capabilities of the workers involved.
  - situations occurring in the vicinity of the workplace caused by work-related activities under the control of the organization.
- External sources not controlled by the organization and occurring in the vicinity of the workplace that can cause injury and ill health to persons in the workplace.
- Actual or proposed changes in organization, operations, processes, activities, and the OH&S management system.
- Changes in knowledge of, and information about, hazards.
- Applicable legal requirements and associated standards and guidelines.
  - Applicable legislation related to specific hazards/tasks are to be documented on the **JHA Form** for each task of the JHA Library and Project Specific JHA.

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(b) Step 2: Hazard Categorization

Hazards shall be identified per established categories for each job step. This can be done based on the knowledge of the job, knowledge of previous accidents/incidents causes, personal experience, and applicable legislation. When identifying potential hazards, it is recommended to include workers in the hazard identification process and inquire about their personal experience and knowledge of the job. Along with a hazard description, types of hazards must be identified as follows:

- **Physical Agent:** Energies, the exposures to which in sufficient quantities and duration may result in illness or injury to human health. Physical agents include noise, vibration, electricity, heat and cold, UV exposure, pressure, and radiation.
- **Chemical Agent:** All chemical elements and compounds in a natural state or in a processed state and their by-products, the exposure to which in sufficient quantities and duration may result in illness or injury to human health. Chemical agents include gases, vapours, liquids, solids, plasma, dust, fume, or mist.
- **Biological Agent:** Microorganisms that are biological in nature and origin, to which exposure in sufficient quantities and duration may result in illness or injury to human health. Biological agents include bacteria, viruses, fungi and parasites or parts thereof or products they generate.
- **Musculoskeletal:** Poorly designed equipment, workstations or work processes which place undue strain on the body by repetitive or strenuous activity. Musculoskeletal hazards include forceful exertion, awkward posture, and repetitive movements.
- **Psychosocial:** Risk of harm and/or threat of harm to mental well-being that a worker may experience. Psychosocial hazards include risks of crime and violence and/or harassment in the workplace; production pressures which can influence the pace of work.
- **Safety:** Hazards that could potentially cause accidents that physically injure workers. Safety hazards include poor housekeeping, falls, pinch points, sharp points/edges, moving machinery, dropping items, pressure systems, fires, and explosions.

(c) Step 3: Risk Assessment

A risk assessment shall be conducted for identified hazards within all JHAs. The level of risk takes into account the probability of the hazard to cause

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injury, illness, and the severity of the injury or illness. The risk level is obtained by multiplying the probability and severity (see Figure 1).

Probability is ranked on a four-point scale as follows:

- 4- Frequent - Injury or illness due to exposure to this hazard is frequent.
- 3 – Likely - Injury or illness due to exposure to this hazard is very likely.
- 2 - Occasionally - There is a chance that the hazard will cause injury or illness.
- 1 - Unlikely - The hazard will probably not cause injury or illness.

Severity is ranked on a four-point scale as follows:

- 4 - Severe injury/death - The hazard could cause fatal or serious injury, illness and/or damage, resulting in permanent or long-term disability and/or significant loss.
- 3 - Critical injury/lost time injury - The hazard could cause moderate injury, illness and/or property damage resulting in lost time.
- 2 - Minor injury - The hazard could cause minor injury or illness without lost time or other loss.
- 1 - Extremely minor injury - The hazard could cause less than a minor injury or illness.

**FIGURE 1 RISK RATING MATRIX**

			Probability (How likely is the incident to occur?)			
			Frequent	Likely	Occasionally	Unlikely
Severity	If the incident occurs, how serious?		4	3	2	1
	Severe injury/death	4	16	12	8	4
	Critical/lost time injury	3	12	9	6	3
	Minor – first aid/medical treatment	2	8	6	4	2
	Extremely minor	1	4	3	2	1

Risks	Colour Code	Value	Action Needed
High risk	Red	12 and above	Immediate action needed
Moderate risk	Yellow	6-9	Some action needed
Low risk	Green	4 and less	No action or minimum action needed

Bestco Construction Ltd. has defined their residual risk threshold level to be any task with a hazard risk of 12 or above. These tasks are considered critical tasks and require the development of a safe job procedure. A complete list of critical tasks can be found in the JHA Library.

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<b>Reviewed By: Michael Zaborsky and Ovidiu Cotiga, Senior Management</b>		<b>Date: 18 August, 2025</b>
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(d) Step 4: Controls

- Refer to **BESTCO-PLY-03 - Controls Policy** and **BESTCO-PRO-03 - Controls Procedure**


(e) Step 5: Risk Re-Assessment

- The level of risk for each hazard in the JHA Library and Project Specific JHA must be re-assessed after implementing the controls, considering the adequacy and effectiveness of the control measures and residual risks must be determined. An effective control must lower the probability of injury/illness or the severity of injury/illness, thereby lowering the overall level of risk.

(f) Step 6: Reviewal and Approval

- JHA Library: The JHA library shall be reviewed by the designated team. Minutes of this meeting shall be recorded and retained. Any recommendations shall be passed on to senior management for their review.
- Once the team has reviewed the JHA and made recommendations, senior management will review and approve the JHAs. Minutes of this meeting will be recorded and retained.
- Project specific JHAs: Project Specific JHAs shall be reviewed and approved by project management/site supervisor.
- Hazard Assessment Review: Hazard assessments must be maintained and updated when required, to reflect work/task process changes and re-approved as appropriate.
- The JHA Library shall be reviewed by senior management at least annually to ensure the information is current and accurate. Senior Management will also assess the progress in achieving the objectives of this program. This review will be documented during the annual review of the OHS program, as outlined in the **Management Review Policy and Procedure**.
- If any of these situations require a JHA task to be developed or modified, the procedure outlined in the General JHA Development Procedure shall be followed using the **JHA Form**.

(g) Step 7: Communication

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- JHA Library: Once approved, the JHA Library shall be available to workers for review. Workers shall be informed of their hazard exposure through a review of the JHAs as it applies to their job. The acknowledgement will be recorded using the **New Hire Orientation Form** and task reviews through **4SafeCom™**. The JHAs must be reviewed and acknowledged by the workers to indicate that they understand their hazard exposures and controls.
- Workers must ensure that all the basic job steps of the task have been noted, are in the correct order, have suitable controls and are documented. If the worker does not agree with the JHA, they must inform their supervisor. The supervisor must review the worker's concern, update the JHA if required, and communicate this information to the workers.
- Supervisors must ensure that workers follow the controls measures specified in the JHA.
- Project Specific JHA: All workers on the project site, including Contractors/Service providers, must review and acknowledge the project specific JHA as part of the site orientation. The acknowledgement will be recorded using the **Site Orientation Form**. Any changes will be communicated to workers through Toolbox talks using the **Toolbox Form**.
- Daily PSA: The site supervisor shall ensure that each worker on site is aware of the daily hazards. Each worker, including Contractors/Service providers, shall review and sign the **PSA Form** on a daily basis prior to commencing work.
- Visitors to the site will also be required to acknowledge the PSA, prior to entering any work areas.

#### 4.7. Hazard Reporting

Refer to **BESTCO-PRO-02.1 – Hazard Reporting Procedure**

#### 4.8. Contractor/Service Providers

Contractors/Service Providers must conduct a Pre-job Safety Assessment (PSA) as per section **4.2 (c) OR** participate in Bestco Construction Ltd. PSA as per agreed upon terms and conditions prior to the commencement of the work.

In addition to the above, Level 3 & 4 Contractors/Service Providers (Refer to **BESTCO-PRO-4.0 – Procurement and Contractor Management Procedure**) shall develop job hazard assessment for all operations and a copy of the



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assessment need to be submitted prior to the commencement of the work. Bestco Construction Ltd. will require that all Contractors/Service providers conduct a hazard assessment such that all safety and environmental conditions pertaining to the Project are reported and outlined. Hazards should be rated according to risk level or have a consistent risk rating system. In addition to the hazards, appropriate evidence of measures to control these hazards must be provided.

All Contractors/Service Providers shall ensure that their job hazard assessment conforms to the applicable sections of 4.1-4.8 of this procedure prior to the commencement of the work.

## 5 Roles and Responsibilities

Responsibilities and accountabilities of workplace parties ensures a commitment by workplace parties ensuring a safe and healthy work environment. The responsibilities of workplace parties are outlined as per the Organization Chart and listed below with the specific roles within the organization.


### 5.1. Senior Management

- Support the development of hazard assessments.
- Allocate the budget, resources and time and assign a team-based approach to participate in the development and review process.
- Ensure all management members are committed to the hazard assessment process.
- Ensure the consultation and participation of workers at all applicable levels and functions.
- Review and approve hazard assessments as required (at least annually).
- Ensure that all management/supervisors and workers adhere to their specific responsibilities outlined within the procedure.

### 5.2. Managers/Supervisors

- Ensure hazard assessments have been developed for all tasks under their control.
- Ensure the JHA is readily available to workers.
- Participate in the development and review of the JHA Library as required.
- Ensure workers under their supervision have reviewed the JHA related to their specific workplace prior to the commencement of work.
- Develop Project Specific JHAs as required.
- Conduct PSAs as required.



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- Ensure workers understand the potential hazards specified in the JHA for applicable tasks and can describe them during toolbox talks, worker interviews during inspections, etc.
- Review comments/concerns of the workers regarding the JHA with management and provide recommendations.
- Practice due diligence by monitoring and ensuring that relevant workplace parties are following the implemented controls when completing a task.
- Follow up with implemented controls to ensure effectiveness.
- Communicate any new hazard analyses or any update to existing analyses.
- Monitor the existence of the JHA by site observations.

### 5.3. Workers


- Participate in the development and review of hazard assessments as required.
- Review and understand the job hazard assessment that are related to their specific job, prior to the commencement of work.
- Report concerns or suggested changes to the job hazard assessment to supervisors.
- Follow the control measures specified in the JHA.
- Participate in PSAs and toolbox talks at projects, as applicable.
- Report any hazards found at the workplace.

### 5.4. Contractors/Service Providers

- Provide copy of job hazard assessment for all operations, as required.
- Participate in the development and review of hazard assessments, as required.
- Review and understand the job hazard assessment that are related to their specific job, prior to the commencement of work.
- Follow the control measures specified in the JHA.
- Participate in PSAs and toolbox talks at projects, as applicable.
- Report any hazards found at the workplace.

### 5.5. JHSC /H&S Reps, as applicable

- Review the JHA as required.
- Discuss supervisors or workers' feedback during meetings, as applicable.
- Recommend required changes to the management.

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### 5.6. Other workplace parties

Other workplace parties who are involved in the process, includes, but is not limited to, Health & Safety Professional(s), Constructor(s), Owner(s), Contractor(s), Supplier(s), Maintenance Department/Personnel, Consultant(s), Professional Engineer(s), as applicable.

- Participate in the development and review of hazard assessments as required.

## 6 Related Documents/Forms

- JHA Library
- Pre-Job Safety Assessment (PSA)
- Project specific Job Hazard Assessment
- BESTCO-PRO-01.2-Document and Record Control Procedure
- BESTCO-PLY-02 – Hazard Assessment, Analysis and Control Policy
- BESTCO-PLY-03 - Controls Policy
- BESTCO-PRO-03 - Controls Procedure
- BESTCO-PRO-02.1 – Hazard Reporting Procedure
- BESTCO-PRO-04.0 – Procurement and Contractor Management Procedure
- Safe Work Practices/Safe Job Procedures
- JHA Form
- PSA Form
- Toolbox talk Form
- New Employee Orientation Form
- Site Orientation Form
- Training Records/Certificates
- Required Competencies for conducting Job Hazard Assessment checklist

## 7 Document and Record Maintenance

Documents and Records are maintained as per **BESTCO-PRO-01.2-Document and Record Control** Procedure.

## 8 Record Retention

Records are to be retained for a minimum of 3 years. Records will remain legible and readily identifiable.

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## 9 Legislated/Other References

- Duties of Employers – Occupation Health and Safety Act s. 25, 26
- Duties of Constructors – Occupation Health and Safety Act s. 23
- Duties of Supervisors – Occupation Health and Safety Act s. 27
- Duties of Workers– Occupation Health and Safety Act s. 28
- Health and Safety Representative– Occupation Health and Safety Act s. 8
- Joint Health and Safety Committee– Occupation Health and Safety Act s. 9
- O. Reg. 213/91: Construction Projects under Occupational Health and Safety Act
- O. Reg. 851: Industrial Establishments under Occupational Health and Safety Act
- Other applicable regulations and standards.
- IHSA COR™ 2020 Guidelines

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# Hazard Reporting Procedure

<b>Version No.</b>	<b>Reason for Revision:</b>	<b>Developed By and Date:</b>	<b>Reviewed By and Date:</b>	<b>Approved By and Date:</b>
1	To meet COR 2020 Standards, company's health and safety processes and Ontario's Health and Safety Legislative Requirements.	Emma Lisson, Health and Safety Coordinator 11 July, 2025	Michael Zaborsky and Ovidiu Cotiga, Senior Management 18 August, 2025	Michael Zaborsky, President 02 September, 2025

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## 1 Purpose

To provide instructions for reporting hazardous situations and conditions that may endanger the health and safety of employees and to ensure that hazards are being reported to management and corrective actions are taken to ensure the health and safety of all workplace parties at Bestco Construction Ltd.

## 2 Scope

The Hazard Reporting procedure applies to all work or work-related activities performed under the control of the organization by workplace parties.

## 3 Definition

**Document:** Medium containing information related to the OHSMS. [Ref. COR 2020 Audit Handbook].

**Hazard:** Source, situation, or act with a potential for harm in terms of human injury. [Ref. COR 2020 Audit Handbook].

**Policy:** A policy is a general commitment, direction or intention and is formally stated by top management. A quality policy statement should express top management's commitment to the implementation and improvement of its management system. [Ref. COR 2020 Audit Handbook].

**Procedure:** A documented, specified method to carry out an activity. **Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].

**Record:** Document stating results achieved or providing evidence of activities performed. [Ref. COR 2020 Audit Handbook].

## 4 Procedure

Bestco Construction Ltd. requires all workplace parties to report any actual or potential hazards as observed immediately.

### 4.1. Hazards Identified by Worker:

1. The employee must fill out Section I of the **Hazard Reporting Form** and submit the form to their supervisor.

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2. The supervisor will immediately investigate the reported hazard and identify the required corrective actions. The supervisor will fill out Section II of the **Hazard Reporting Form**. If required, the supervisor may request the assistance of the Joint Health and Safety Committee (JHSC) or the Health and Safety Representative (H&S Rep) on site.
3. The supervisor will make arrangements to notify the appropriate personnel to implement corrective actions.
4. The supervisor will verify that corrective action was taken to mitigate the reported hazard. Once the issue is rectified, the supervisor will complete Section III of the **Hazard Reporting Form**. The form is then to be posted on the health and safety board, and a copy will be given to the JHSC or H&S Rep.
5. If the worker does not receive a response from their supervisor, the worker may then report the hazard to management.

Note: This procedure does not apply to situations where a work refusal under the health and safety legislation is involved. These situations are covered in the **BESTCO-PRO-13.5 - Work Refusal Procedure**.

#### **4.2. Hazards Identified by JHSC/H&S Representatives:**


Health and Safety Representative or the JHSC has power to identify situations that may be a source of danger or hazard to workers and to make recommendations or report his or her findings thereon to the Senior Management and the workers. The worker representative who inspects the physical condition of the workplace will inform the committee of situations that may be a danger or hazard to workers. Recommendations will be made to the management based on the findings.

#### **4.3. Hazards Identified by Other Workplace Parties:**

Other workplace parties including Contractors, Service providers, Visitors, etc. shall report any actual or potential hazards to the supervisor in-charge for the workplace.

## **5 Roles and Responsibilities**

Responsibilities and accountabilities of workplace parties ensures a commitment by workplace parties ensuring a safe and healthy work environment. The responsibilities of workplace parties are outlined as per the Organization Chart and listed below with the specific roles within the organization.

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### 5.1. Senior Management

- Ensure action is taken on identified hazards.
- Inform workers of any hazard in the workplace and in the handling, storage, use, disposal and transport of any article, device, equipment or a biological, chemical, or physical agent.
- Respond to JHSC within 21 days if a recommendation is provided.

### 5.2. Supervisors

- Investigate hazardous situations brought to their attention.
- Complete Section II and III of the **Hazard Reporting Form** without delay.
- Take corrective action without delay.
- Inform workers of corrective actions taken.
- Post the completed **Hazard Reporting Form** on the health and safety board.
- Provide a copy of the completed form to the site JHSC or Health and Safety Representative.

### 5.3. Workers

- Immediately report hazards to their supervisor.
- Complete Section I of the **Hazard Reporting Form** without delay.
- Provide recommendations to the supervisor on how to eliminate or control the hazard.
- Inform management if the supervisor does not address the issue.

### 5.4. Contractors/Service Providers/Others

- Immediately report any hazards to the site supervisor.

### 5.5. Joint Health and Safety Committee (if applicable)

- Identify situations that may be a source of danger or hazard to workers.
- Address the hazards in the committee meetings.
- Make recommendations to management as required.

### 5.6. Health and Safety Representative

- Identify situations that may be a source of danger or hazard to workers.
- Inform the hazards to the supervisor or management.
- Make recommendations to the management as required.



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## 6 Related Documents/Forms

- **Hazard Reporting Form**
- BESTCO-PRO-01.2-Document and Record Control Procedure
- BESTCO-PRO-13.5 - Work Refusal Procedure.

## 7 Document and Record Maintenance


Documents and Records are maintained as per **BESTCO-PRO-01.2-Document and Record Control Procedure**.

## 8 Record Retention

Records are to be retained for a minimum of 3 years. Records will remain legible and readily identifiable.

## 9 Legislated/Other References

- Duties of employers – Occupational Health and Safety Act, s. 25, 26
- Duties of constructors – Occupational Health and Safety Act, s. 23
- Duties of supervisors – Occupational Health and Safety Act, s. 27
- Duties of workers– Occupational Health and Safety Act, s. 28
- Health and Safety Representative– Occupational Health and Safety Act, s. 8
- Joint Health and Safety Committee– Occupational Health and Safety Act, s. 9

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## Controls Policy

Bestco Construction Ltd. is committed to the ongoing and proactive identification and implementation of controls to mitigate health and safety hazards. The goal is to eliminate or reduce the risk of hazards in the workplace through the implementation of effective controls in a timely manner. This Policy shall be accompanied by the Control Procedure.

Senior Management is committed to providing the necessary budget, time, and resource for ensuring the implementation of the program and necessary controls to mitigate hazards.

All employees are required to follow the specified controls associated with their tasks to mitigate hazards.

The program and its performance shall be reviewed annually for sustainability, adequacy, and effectiveness.




Name: Michael Zaborsky

Title: President

Company: Bestco Construction (2005) Ltd.


Sept. 2, 2025

Date: 02 September, 2025

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## Controls Procedure

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## 1 Purpose

Hazard assessment, analysis and control is a critical component to Bestco Construction Ltd.'s Occupational Health & Safety (OHS) Management System. The Controls procedure outlines the requirement to develop formal controls for all identified hazards within Bestco Construction Ltd. workplaces. Following Hierarchy of Controls ensures that most effective controls are in place.

## 2 Scope

The Controls policy and procedure applies to all work or work-related activities performed under the control of the organization by workplace parties.

## 3 Definitions

**Competency:** A person performing a task for, or on behalf of, the organization is competent to do so by means of appropriate:

- Knowledge of the hazards and risks associated with the tasks for the operations and activities.
- Demonstrated understanding and working knowledge of the control measures associated with the hazards and risks.
- Training regarding the hazards, risks, and associated control measures
- Aptitudes, such as skillset, ability, and willingness to deal with the hazards, risks, and control measure.

[Ref. COR 2020 Audit Handbook].


**Competent Person:** A person who,

- is qualified because of knowledge, training, and experience to organize the work and its performance,
- is familiar with this Act and the regulations that apply to the work, and
- has knowledge of any potential or actual danger to health or safety in the workplace.

[Ref. OHSA].

**Competent Worker:** In relation to specific work, means a worker who,

- is qualified because of knowledge, training, and experience to perform the work,
- is familiar with the Occupational Health and Safety Act and with the provisions of the regulations that apply to the work, and
- has knowledge of all potential or actual danger to health or safety in the work.

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[Ref. Construction Reg 213/91 under Occupational Health and Safety Act].

**Document:** Medium containing information related to the OHSMS. [Ref. COR 2020 Audit Handbook].

**Hazard:** Source, situation, or act with a potential for harm in terms of human injury. [Ref. COR 2020 Audit Handbook].

**Hazard Assessment:** The process of conducting a systematic review to:

- Identify hazards associated with work activities
- Analyze or evaluate the risks(s) associated with the hazards
- Determine appropriate ways to eliminate or control the hazards

[Ref. COR 2020 Audit Handbook].

**Legal Requirements:** All applicable legislation, including but not limited to the Occupational Health and Safety Act and its regulations. [Ref. COR 2020 Audit Handbook].


**Occupational Health and Safety (OHS):** Conditions and factors that affect or could affect the health and safety of employees or other workers, inclusive of temporary workers and contractor personnel, visitors, suppliers, vendors, or any other person in the workplace. [Ref. COR 2020 Audit Handbook].

**Occupational Health and Safety Management System (OHSMS):** As defined in the OHS Act "means a coordinated system of procedures, processes and other measures that is designed to be implemented by employers to promote continuous improvement in occupational health and safety. [Ref. COR 2020 Audit Handbook].

**Other Requirements:** Requirements or provisions the organization subscribes, however are not legally binding, such as industry standards. [Ref. COR 2020 Audit Handbook].

**Policy:** A policy is a general commitment, direction or intention and is formally stated by top management. A quality policy statement should express top management's commitment to the implementation and improvement of its management system. [Ref. COR 2020 Audit Handbook].

**Procedure:** A documented, specified method to carry out an activity. **Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].

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**Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].

**Project:** a construction project, whether public or private, including,

- the construction of a building, bridge, structure, industrial establishment, mining plant, shaft, tunnel, caisson, trench, excavation, highway, railway, street, runway, parking lot, cofferdam, conduit, sewer, watermain, service connection, telegraph, telephone or electrical cable, pipe line, duct or well, or any combination thereof,
- the moving of a building or structure, and
- any work or undertaking, or any lands or appurtenances used in connection with construction.

[Ref. OHSAA].

**Record:** Document stating results achieved or providing evidence of activities performed. [Ref. COR 2020 Audit Handbook].

**Risk:** Combination of the likelihood of an occurrence of a hazardous event or exposure(s) and the severity of injury or occupation illness that can be caused by the event or exposure(s) [Ref. COR 2020 Audit Handbook].

**Risk Assessment:** Process of evaluating the risk(s) arising from a hazard(s), taking into account the adequacy of any existing controls, and deciding whether or not the risk(s) is acceptable [Ref. COR 2020 Audit Handbook].

**Workplace:** any land, premises, location, or thing at, upon, in or near which a worker works. [Ref. OHSAA].



**Workplace Parties:** Includes, but is not limited to, the employer, supervisor(s), workers, constructor, visitors, and owner. [Ref. COR 2020 Audit Handbook].

## 4 Procedure

### 4.1. Control Identification

Control measures shall be identified and implemented for each hazard. Consideration shall be given to reducing the risks according to the following hierarchy (see Figure 2):

- **Elimination** – The process of removing the hazard from the workplace.
- **Substitution** – Substituting the hazard with something that is considered to be less hazardous.

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- **Engineering Controls** – Designs or modifications to the workplace, equipment, and processes.
- **Administrative Controls** – Alter the way work is performed. This includes policies and other rules and work practices such as standards and operating procedures.
- **Personal Protective Equipment** – Used by individuals to reduce exposure. This is the least effective means of controlling a hazard.

**FIGURE 1 HIERARCHY OF CONTROLS [SOURCE: NIOSH]**



Consideration shall also be given to the location of controls.

- **At the Source:** Elimination of task or substituted task.
- **Along the Path:** Redesign of workstation/processes, isolating processes, automated procedures, relocation, barriers, absorption, dilution.
- **At the Worker:** Job rotation and relief procedures, orientation, training and supervision, safe job procedures, safe work practices, emergency planning, housekeeping, hygiene practices, personal protective equipment (PPE).


#### 4.2. Application of Hierarchy of controls

The hierarchy of controls will be used to establish the appropriate controls for each hazard identified as part of the hazard identification and risk assessment process. All efforts will be made to examine the feasibility of elimination and substitution before looking at other avenues of controls. PPE by itself is not a control and should be used in combination with engineering and administrative controls. Refer to **BESTCO-PRO-02.0 - Hazard Assessment, Analysis and Control Procedure**.

#### 4.3. Development of Control Methods

Controls will be assessed as part of the Job Hazard Analysis (JHA) process, using a team-based approach. Refer to **BESTCO-PRO-02.0 - Hazard Assessment, Analysis and Control Procedure**. JHA form will be used to identify hazards and controls.



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Applicable legal and other requirements such as standards, guidelines or manufacturer's instructions will be considered as part of the development. The most effective control method (starting from Elimination to PPE) will be determined and proposed to Senior Management for implementation.

Administrative Controls such as **Safe Work Practices and Safe Job Procedures** will be developed by the team. The JHA Library will be included with the list of required **Safe Work Practices and Safe Job Procedures** and will be used as a foundation to build the practices and procedures.

The practices and procedures will be updated to reflect process changes and re-approved as appropriate.

The team will be led by a member of management. The team will be comprised of competent workplace parties which may include the following individuals:

- Senior Management
- Middle Management (Project Managers and other facility managers)
- Supervisors
- Workers with knowledge of the specific tasks

The following personnel may be added to team or consulted:


- Health & Safety Professional(s)
- Joint Health and Safety Committee (JHSC) members (if applicable) or health and safety representatives
- Employee(s) with technical knowledge of the activity/job (technical support, engineering expertise, maintenance)
- Owner(s), Constructor(s), Contractor(s), Supplier(s), Maintenance Department/Personnel, Consultants, Professional Engineer(s) (If Applicable).

Pro-job Safety Assessment (PSA) will include the hazards and controls for the day. PSA Form will be used.

#### 4.4. Competencies

The competency of workplace parties involved with the hazard assessment, analysis and control process should include:

- a) knowledge of the hazards and risks associated with the tasks for the operations and activities

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- b) demonstrated understanding and working knowledge of the control measures associated with the hazards and risks
- c) training with regard to the hazards, risks and associated control measures
- d) aptitudes, such as skillset, ability, and willingness to deal with the hazards, risks and control measures

Management will ensure the Required Competencies for conducting Job Hazard Assessment checklist is completed before appointing the JHA Development team members.

PSAs are conducted by site supervisors with the participation of workers who are competent to perform the daily tasks.

#### 4.5. Review, Approval and Re-approval of Controls

Once the team has developed the list of controls and proposed them to Senior Management, Senior Management will review and approve them. Minutes of this meeting will be recorded and retained.


**Safe Work Practices and Safe Job Procedures** (SWPs and SJPs) will also be reviewed, and approval will be provided by Senior Management. **Safe Work Practices and Safe Job Procedures** will be updated to reflect process changes and re-approved as appropriate.

#### 4.6. Implementation of Controls

Senior Management will ensure that the proposed controls are implemented prior to the project commencement. Control measures will be readily available at the point of use as required. Supervisors will ensure the effectiveness of controls on an ongoing basis. Workers at Bestco Construction Ltd. will not be allowed to commence the work prior to reviewing the implemented controls.

#### 4.7. Communication of Controls

Identified control measures shall be communicated to all relevant workplace parties prior to the commencement of work. The Controls are communicated to workers through new hire orientation, site orientation, toolbox talks and **4SafeCom™**. Appropriate training shall also be considered as necessary for implementation of controls.

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Workplace parties can make recommendations to the senior management for recommended controls. Senior Management could consider these controls for implementation and allocate appropriate budget and resources.

#### 4.8. Review and Acknowledgement by workers

Employees will review implemented controls inclusive of SWPs and SJPs related to their job and acknowledge that they have understood them before undertaking their assigned task(s) through **4SafeCom™**. Workers shall review and acknowledge the Controls as part of new hire orientation, site orientation and toolbox talks.

Supervisors are responsible for ensuring that workplace parties understand the implemented controls that apply to their specific tasks. Controls inclusive of SWPs and SJPs shall be readily available at all work locations for the workers to review any time.

As workers review the implemented controls, they are to report any concerns or suggested changes to their supervisor or JHSC (if applicable). The supervisor or JHSC (if applicable) will review the input of the workers then make suggestions to the management or JHSC (if applicable).


#### 4.9. Annual Review

The controls shall be reviewed by senior management at least annually to ensure they are up-to-date and still reflect the Bestco Construction Ltd. scope of work. The implemented controls will be assessed based on effectiveness and applicable legal and other requirements such as standards, guidelines, or manufacturer's instructions.

Senior Management will also assess the progress in achieving the objectives of this program. This review will be documented during the annual review of the OHS program, as outlined in the **BESTCO-PRO-14.1 - Management Review and Procedure**.

Management will use the **Safe Work Practices Annual Review Form** and **Safe Job Procedures Annual Review Form** to document the review. Input from the team will be taken into consideration as part of the review. Management will assign the team to develop any new practices and/or update the existing practices as required. New or updated safe work practices will be communicated to all affected workers.

#### 4.10. Contractor/Service Providers

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All Contractors/Service Providers shall ensure that their Controls conforms to sections 4.1-4.8 of this procedure prior to the commencement of the work.

## 5 Roles and Responsibilities


Responsibilities and accountabilities of workplace parties ensures a commitment by workplace parties ensuring a safe and healthy work environment. The responsibilities of workplace parties are outlined as per the Organization Chart and listed below with the specific roles within the organization.

### 5.1. Senior Management

- Support the implementation of controls.
- Allocate the resources and assign a team-based approach to participate in the development and implementation of controls.
- Ensure all management members are committed to the Policy and Procedure.
- Ensure the consultation and participation of workers at all applicable levels and functions.
- Review and approve controls as required (at least annually).
- Ensure control measures are readily available at the point of use as required.
- Ensure that all management/supervisors and workers adhere to their specific responsibilities outlined within the procedure.

### 5.2. Managers/Supervisors

- Ensure controls have been developed for all tasks under their supervision.
- Ensure the controls are readily available to workers.
- Monitor effectiveness of controls.
- Participate in the development and review.
- Ensure workers under their supervision have reviewed the controls related to their specific workplace prior to the commencement of work.
- Ensure Controls are communicated as part of new hire orientation, site orientation and toolbox talks.
- Develop Project Specific JHAs as required.
- Conduct daily Pre-Job Safety Assessments (PSAs) at projects.
- Ensure workers understand the implemented controls as specified in the JHA for applicable tasks and can describe them during toolbox talks, worker interviews during inspections, etc.

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- Review comments/concerns of the workers regarding the implemented controls with management and provide recommendations.
- Practice due diligence by monitoring and ensuring that relevant workplace parties are following the implemented controls when completing a task.
- Follow up with implemented controls to ensure effectiveness.
- Communicate any new controls or any update to existing controls.

### 5.3. Workers

- Participate in the development and review of implemented controls as required.
- Review and understand the job hazard assessment and implemented controls that are related to their specific job, prior to the commencement of work.
- Review and acknowledge the controls as part of new hire orientation, site orientation, pre-job safety assessment and toolbox talks.
- Report concerns or suggested changes to the implemented controls to supervisors.
- Follow the control measures specified in the JHA.


### 5.4. Contractors/Service Providers

- Review and understand the job hazard assessment and implemented controls that are related to their specific job, prior to the commencement of work.
- Review and acknowledge the controls as part of pre-job safety assessment and toolbox talks.
- Report concerns or suggested changes to the implemented controls to supervisors.
- Follow the control measures specified in the JHA.

### 5.5. JHSC members/H&S Rep as applicable

- Review the controls as required.
- Discuss supervisors or workers' feedback during meetings, as applicable.
- Recommend required changes to the management.

### 5.6. Other workplace parties

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Other workplace parties who are involved in the process, includes, but is not limited to, Owner(s), Constructor(s), Contractor(s), Supplier(s), Maintenance Department/Personnel, Consultants, Professional Engineer(s) (If Applicable).

## 6 Related Documents/Forms

- Safe Work Practices/Safe Job Procedures
- Safe Work Practices Annual Review Form
- Safe Job Procedures Annual Review Form
- BESTCO-PRO-01.2-Document and Record Control Procedure
- BESTCO-PLY-02.0 - Hazard Assessment, Analysis and Control Policy
- BESTCO-PRO-02.0 - Hazard Assessment, Analysis and Control Procedure
- BESTCO-PLY-03 - Controls Policy
- JHA Library
- Pre-Job Safety Assessment (PSA)
- Project specific Job Hazard Assessment
- JHA Form
- PSA Form
- Toolbox Talk Form
- New Employee Orientation Form
- Site Orientation Form
- Training Records/Certificates

## 7 Document and Record Maintenance


Documents and Records are maintained as per **BESTCO-PRO-01.2-Document and Record Control Procedure**.

## 8 Record Retention


Records are to be retained for a minimum of 3 years. Records will remain legible and readily identifiable.

## 9 Legislated/Other References

- Duties of Employers – Occupation Health and Safety Act s. 25, 26
- Duties of Constructors – Occupation Health and Safety Act s. 23
- Duties of Supervisors – Occupation Health and Safety Act s. 27
- Duties of Workers – Occupation Health and Safety Act s. 28

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- Health and Safety Representative– Occupation Health and Safety Act s. 8
- Joint Health and Safety Committee– Occupation Health and Safety Act s. 9
- O. Reg. 213/91: Construction Projects under Occupational Health and Safety Act
- O. Reg. 851: Industrial Establishments under Occupational Health and Safety Act
- Other applicable Regulations and standards
- IHSA COR™ 2020 Guidelines

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## Procurement and Contractor Management Policy

Bestco Construction Ltd.'s Procurement and Contractor Management program is designed to provide guidelines to establish, implement, monitor, and maintain the procurement of goods and manage contractors. It is aimed at documenting a procedure which will ensure that every contractor employed by Bestco Construction Ltd. is committed to working safely in accordance.

This policy applies to all personnel who have been hired by Bestco Construction Ltd. to provide goods and services. This policy also applies to all internal stakeholders involved in procuring, monitoring, and evaluating contractors.

Senior Management is committed to providing time, budget and resources needed to ensure the implementation of the procurement and contractor program a to select, monitor, and evaluate contractors. Employers and management are responsible for following and adhering to procedure to select and evaluate goods and services.

Supervisors are required to collect and retain all necessary documents as required by procedure. Supervisors are required to observe and ensure contractors are working safely and following the procedures addressed in the program.

Contractors are required to complete and provide all necessary documentation to Bestco Construction Ltd.'s site supervisors and management where required. Company to ensure that documentation is reviewed and collected. Contractors are to resolve any discrepancy or contravention of this policy upon notice by Bestco Construction Ltd. and ensure their workers are trained in this policy and procedure.

Bestco Construction Ltd. will also ensure that contractors are involved in the hazard assessment analysis and control process. Contractors will be required to submit hazard assessment documentation as part of pre-qualification and participate in ongoing hazard assessments while on site.

The program and its performance shall be reviewed annually for sustainability, adequacy, and effectiveness.



Name: Michael Zaborsky


Title: President

Company: Bestco Construction (2005) Ltd.

Sept. 2, 2025


Date: 02 September, 2025



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# Procurement and Contractor Management Procedure

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1	To meet COR 2020 Standards, company's health and safety processes and Ontario's Health and Safety Legislative Requirements.	Emma Lisson, Health and Safety Coordinator 11 July, 2025	Michael Zaborsky and Ovidiu Cotiga, Senior Management 18 August, 2025	Michael Zaborsky, President 02 September, 2025

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## 1 Purpose

The purpose of this procedure is to establish, implement, monitor, and maintain a health and safety program for procurement of goods and services, and contractor management at Bestco Construction Ltd. The program will provide guidance to coordinate the site-specific requirement among all employers working for Bestco Construction Ltd. as contractors and/or service providers. Bestco Construction Ltd. requires all contractors and service providers to work in accordance with company rules and governing legislation.

## 2 Scope

The Procurement and Contractor Management policy and procedure applies to all work or work-related activities performed under the control of the organization by workplace parties, and may be performed by employees of external providers, suppliers, contractors, vendors, individuals, agency workers, and by other persons to the extent the organization shares control over their work or work-related activities.

## 3 Definitions

**Competency:** A person performing a task for, or on behalf of, the organization is competent to do so by means of appropriate:

- Knowledge of the hazards and risks associated with the tasks for the operations and activities.
- Demonstrated understanding and working knowledge of the control measures associated with the hazards and risks.
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- Aptitudes, such as skillset, ability, and willingness to deal with the hazards, risks, and control measure.

[Ref. COR 2020 Audit Handbook].


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- is qualified because of knowledge, training, and experience to organize the work and its performance,
- is familiar with this Act and the regulations that apply to the work, and
- has knowledge of any potential or actual danger to health or safety in the workplace.

[Ref. OHSA].

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- b) is familiar with the Occupational Health and Safety Act and with the provisions of the regulations that apply to the work, and
  - c) has knowledge of all potential or actual danger to health or safety in the work.
- [Ref. O. Reg. 213/91: Construction Projects under OHSA].

**Compliance:** Meeting all requirements outlined within applicable legislation and regulations. [Ref. COR 2020 Audit Handbook].

**Conformity:** Fulfillment of a requirement. [Ref. COR 2020 Audit Handbook].

**Contractor:** A person or organization providing services to another organization in accordance with agreed upon specification, terms, and conditions.  
[Ref. COR 2020 Audit Handbook].

- A subcontractor is a person or organization that takes a portion of a contract from the principal contractor or another subcontractor

**Constructor:** A person who undertakes a project for an owner and includes an owner who undertakes all or part of a project by himself or by more than one employer. [Ref. OHSA].

**Document:** Medium containing information related to the OHSMS. [Ref. COR 2020 Audit Handbook].

**Employer:** A person who employs one or more workers or contracts for the services of one or more workers and includes a contractor or subcontractor who performs work or supplies services and a contractor or subcontractor who undertakes with an owner, constructor, contractor, or subcontractor to perform work or supply services [Ref. OHSA].


**Hazard:** Source, situation, or act with a potential for harm in terms of human injury. [Ref. COR 2020 Audit Handbook].

**Hazard Assessment:** The process of conducting a systematic review to:

- Identify hazards associated with work activities
- Analyze or evaluate the risks(s) associated with the hazards
- Determine appropriate ways to eliminate or control the hazards

[Ref. COR 2020 Audit Handbook].

**Incident:** Work related event(s) in which an injury, fatality or occupational illness occurred; and includes event(s) where no injury or illness occurred, such as a near hit or property damage. [Ref. COR 2020 Audit Handbook].

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**Legal Requirements:** All applicable legislation, including but not limited to the Occupational Health and Safety Act and its regulations. [Ref. COR 2020 Audit Handbook].

**Management:** People who have care and control over people and/or processes [Ref. COR 2020 Audit Handbook].

- **Middle Management (Project Manager, Office Manager, etc.):** A group of managers who administers and/or supervises the affairs of a department or division at the level below senior management of the company or organization

**Non-conformity:** Non-fulfillment of a requirement [Ref. COR 2020 Audit Handbook].

**Occupational Health and Safety (OHS):** Conditions and factors that affect or could affect the health and safety of employees or other workers, inclusive of temporary workers and contractor personnel, visitors, suppliers, vendors, or any other person in the workplace. [Ref. COR 2020 Audit Handbook].

**Occupational Health and Safety Management System (OHSMS):** As defined in the OHSA “means a coordinated system of procedures, processes and other measures that is designed to be implemented by employers to promote continuous improvement in occupational health and safety. [Ref. COR 2020 Audit Handbook].


**Organization:** Company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public, or private, that has its own functions, management, and administration. [Ref. COR 2020 Audit Handbook].

**Other Requirements:** Requirements or provisions the organization subscribes, however are not legally binding, such as industry standards. [Ref. COR 2020 Audit Handbook].

**Policy:** A policy is a general commitment, direction or intention and is formally stated by top management. A quality policy statement should express top management's commitment to the implementation and improvement of its management system. [Ref. COR 2020 Audit Handbook].

**Procedure:** A documented, specified method to carry out an activity. **Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].

**Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].

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**Project:** a construction project, whether public or private, including,

- a) the construction of a building, bridge, structure, industrial establishment, mining plant, shaft, tunnel, caisson, trench, excavation, highway, railway, street, runway, parking lot, cofferdam, conduit, sewer, watermain, service connection, telegraph, telephone or electrical cable, pipe line, duct or well, or any combination thereof,
- b) the moving of a building or structure, and
- c) any work or undertaking, or any lands or appurtenances used in connection with construction.

[Ref. OHSA].

**Record:** Document stating results achieved or providing evidence of activities performed.

[Ref. COR 2020 Audit Handbook].

**Senior Management (Company President, Vice President of Operations) -**

**Employer's Representative:** Person(s) at the highest level of an organization's structure responsible for leading, managing and /or directing an organization's day-to-day activities and/or operations. [Ref. COR 2020 Audit Handbook].


**Supervisor:** A person who has charge of a workplace or authority over a worker. [Ref. OHSA].

**Supplier:** A person who supplies any machine, device, tool, or equipment under any rental, leasing, or similar arrangement for use in or about a workplace. [Ref. OHSA].

**Worker:** Any of the following, but does not include an inmate of a correctional institution or like institution or facility who participates inside the institution or facility in a work project or rehabilitation program,

- a) A person who performs work or supplies services for monetary compensation.
- b) A secondary school student who performs work or supplies services for no monetary compensation under a work experience program authorized by the school board that operates the school in which the student is enrolled.
- c) A person who performs work or supplies services for no monetary compensation under a program approved by a college of applied arts and technology, university, private career college or other post-secondary institution.
- d) Such other persons as may be prescribed who perform work or supply services to an employer for no monetary compensation

[Ref. OHSA].

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**Workplace:** any land, premises, location, or thing at, upon, in or near which a worker works. [Ref. OHSA].

**Workplace Harassment:** means,

- a) 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
- b) workplace sexual harassment

[Ref. OHSA].

**Workplace Parties:** Includes, but is not limited to, the employer, supervisor(s), workers, constructor, visitors, and owner. [Ref. COR 2020 Audit Handbook].

**Workplace Sexual Harassment:** means,

- a) 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, or
- b) 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

[Ref. OHSA].

**Workplace Violence:** means,


- 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 the worker,
- c) a statement or behaviour that it 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

[Ref. OHSA].

## 4 Procedure

The Procurement and Contractor Management program involves the procurement of goods and services, pre-qualification procedure, site orientation, ongoing performance monitoring, performance evaluation, contractor retainment, and communication.



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One of the key principles for managing contractors/service providers is balancing the need for detailed documentation with the knowledge and competency of the people who will be doing the tasks. The focus has changed from the need to just document to that of making sure that the competencies required for personnel to complete tasks have been correctly identified. Therefore, the first area to be identified by Bestco Construction Ltd. is in accordance with the standard is evaluation of the competence and capability of the contractor/service provider to undertake the designated work.

The criteria for selection and evaluation shall be established. Records of evaluation results and any necessary actions arising from the evaluation shall be maintained. The process shall include reviewing incident reports, clearance certificates, orientation records, internal feedback, complaints, assessments, etc. Bestco Construction Ltd. also reviews each contractor/service provider's history of work, Workplace Safety and Insurance board (WSIB performance), and references provided.

The OHS criteria for selecting, monitoring, and evaluating contractors/service providers shall include:

- The ability and competency of the contractor/service provider to assess, analyze and control hazards arising from their own work that may impact the organization's workers.
- The ability and competency of the contractor/service provider to assess, analyze and control hazards arising from organization's work that may impact contractor's workers.
- Ensure that the appropriate contracts and any required safety policies and work procedures are received prior to work commencing.
- Ensure that the requirements of this policy and program are carried out by the contractors/service providers.
- Communication with workplace parties when there are changes affecting the health and safety of the work.


#### **4.1. Contractor/Service Provider Classification Levels**

Due to the broad scope of activities, numerous variables exist which may affect the manner in which contractors/service providers are evaluated and managed.

These variables include but are not limited to:


- a. The level of risk involved,
- b. Complexity of project,
- c. Length of assignment (Short or Long Term),



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There are four classification levels of risk identified for contractors/service providers. The higher the risk level, the greater the degree of evaluation and performance criteria. Contractors/service providers should always be classified into the level, which represents the highest level of risk based on the activities that they will be performing.

Classification Level	Examples	Risk Level
Level 1	This group is primarily in the service industry such as; <ul style="list-style-type: none"> <li>• Truck drivers</li> <li>• Suppliers</li> <li>• Vendors</li> <li>• Delivery Services</li> </ul>	<b>Low</b>
Level 2	This group has limited risk-generating activities such as; <ul style="list-style-type: none"> <li>• Consultants</li> <li>• Quality/Safety Assurance personnel</li> <li>• Service technicians and repair personnel (not performing critical tasks).</li> <li>• Waste Disposal/Pickup</li> <li>• Landscaping/Snow Removal</li> </ul>	<b>Low to Medium</b>
Level 3	This group is involved in medium to high-risk work activities although the scope of the work is limited such as; <ul style="list-style-type: none"> <li>• Service technicians and repair personnel performing work with critical tasks. (i.e., working at heights, confined space, lock out)</li> <li>• Long Term assignments such as janitorial services, security services or facility maintenance services</li> <li>• Equipment installers working with materials/technology on site</li> <li>• </li> </ul>	<b>Medium to High</b>
Level 4	This group <ul style="list-style-type: none"> <li>• Contractor is involved in high/extreme risk work activities (based on the risk register)</li> <li>• Large Construction Projects</li> </ul>	<b>High</b>  This group has the highest risk levels (high and extreme) and / or

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Classification Level	Examples	Risk Level
	<ul style="list-style-type: none"> <li>○ Employment of a large number of skilled and unskilled workers</li> <li>○</li> </ul>	complexity of work

Contractor/Service Provider List with the classification level and current status will be maintained by Senior Management.

#### 4.2. Implementation

The requirements for compliance by contractors/service providers of various levels are outlined in following paragraphs. This program requires that Level 2, 3 and 4 contractors/service providers be evaluated as part of the selection process. The following criteria shall be applied:

1. Contractors/service providers will be informed of Bestco Construction Ltd.'s Procurement and Contractor Management Program requirements prior to the issuance of a contract.
2. Contractors/service providers will be required to submit completed **Contractor/Service Provider Pre-Qualification Form, Contractor/Service Provider Acknowledgement Form**, and other required documentation.
3. Senior Management will assess potential contractors/service providers based on their submitted **Contractor/Service Provider Pre-Qualification Form** to determine the extent of Level 3-4 involvement in implementing and maintaining Bestco Construction Ltd.'s requirements.
4. The ability and competency of the contractor/service provider to be able to assess/analyze and control hazards arising from their own work that may impact the organization's workers, and Bestco Construction Ltd.'s work that may impact the contractor's workers, shall be verified during selection, monitoring, and post evaluation stages.
5. Contractors/service providers will be evaluated upon completion of the contracted work to ensure health and safety programs were followed as prescribed by Bestco Construction Ltd. and industry safety records maintained according to Bestco Construction Ltd. standards and evaluation criteria.
6. Level 3 and 4 Construction contractors/service providers, prior to commencing work, must sign the **Contractor/Service Provider Pre-Commencement Checklist/Contractor/Service Provider H&S Checklist** indicating their understanding and adherence to Bestco Construction Ltd. standards, that they have been informed of Bestco Construction Ltd.

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requirements and agree to abide with the requirements throughout the duration of the contract.

Pre-qualification forms, checklists, and assessments are to be maintained and retained by Senior Management.

#### 4.3. Contractor/Service Provider Pre-qualification

Contractors/service providers can be pre-qualified and kept current using the following process:


##### (a) Pre-qualification Process

Upon identifying the need for a contractor/service provider to be engaged, Bestco Construction Ltd.'s Senior Management shall:

1. Send a blank copy of the **Contractor/Service Provider Pre-Qualification Form** to the potential contractor/service provider for completion and submittal.
2. The completed and signed form including all required accompanying documents shall be submitted by the potential contractor/service provider to Senior Management.
3. Upon receiving the documentation for a Level 1 or 2 contractor/service provider, Senior Management shall review the documents. Senior Management shall inform the appropriate parties of newly approved vendors, suppliers, or contractors.
4. For Level 3 or 4 contractors all documentation shall be reviewed and signed off by the H&S Manager/Coordinator before being sent to the Senior Management for necessary consideration and approval.
5. Senior Management will also review any previous contractor/service provider's Post Performance Evaluations completed by Bestco Construction Ltd.
6. Senior Management or designated site authority shall make the final decision of prequalification approval of the potential contractor/service provider.

##### (b) Duration of Approval

The Approved contractor/service provider status shall remain for a period not exceeding twelve months (12) from the date the approval was issued. A grace period of three (3) months may be considered on a case-by-case basis to allow for continuity of work and time for requalification and correction of

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deficiencies (if required). Province specific Workplace Compensation certificate and Liability Insurance must be current.

1. The contractor/service provider shall be informed of this criterion by Senior Management at the time of Approval notification.

(c) **Emergency Approvals**

All facilities will maintain a list of approved contractors/service providers that will be used in the event of emergencies to help mitigate, control and/or eliminate that may adversely affect the health & safety of workers.

If a previously unapproved contractor/service provider must be brought to a facility to mitigate or terminate an emergency situation, or to prevent an imminent emergency situation, Bestco Construction Ltd. may waive submission of any required documentation by the contractor/service provider until a reasonable time after the work has commenced. In such circumstances, the facility will take all precautions reasonable in the circumstances to ensure the continued protection of all persons at the facility and the environment.

(d) **Contractor/Service Provider Approval Levels**

Contractors/service providers will have the following approval Levels;

(i) **Pending**


Requested documentation has been received but not approved. A contractor/service provider can also move from approved to pending if documentation is out of date such as insurance certificate on file out of date.

(ii) **Approved**

Documentation has been reviewed, and contractor/service provider is approved for use.

(iii) **Not Approved,**

The contractor/service provider has not been approved based on evaluation by Senior Management in consultation with H&S representative if necessary. i.e., contractor/service provider was not able to provide proof of Workers Compensation Coverage.

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(iv) Do Not Use

Bestco Construction Ltd. has determined from a review of the pre-qualification documentation or contractor/service provider's previous **Post Performance Evaluation** that contractor/ service provider should be not used for work at Bestco Construction Ltd. facilities.

#### 4.4. Pre-Qualification Requirements

(a) Level 1

Contractor/service provider shall be informed of Bestco Construction Ltd.'s site H&S requirements.

(b) Level 2


In addition to all the requirements for Level 1, Level 2 contractor/service provider must provide the following information:

- Contractor Acknowledgement Form
- General Liability Insurance
- WSIB Clearance Certificate
- Pre-Qualification Form
- WISB Injury Summary Report

(c) Level 3

In addition to all the requirements for Levels 1 and 2, the Level 3 contractor/service provider must provide the following information:

- Copy of OH&S Manual inclusive of policies and procedures in connection with the obligation of an "employer" under the Ontario Occupational Health and Safety Act, all Contractors shall provide the following to Bestco Construction Ltd. prior to starting work.
  - A written and up-to-date occupational health and safety policy and procedure (Ref. OHSA s.25(2)(j)).
  - A written and up-to-date workplace violence and harassment policy and procedure (Ref. OHSA s.32.0.1-32.0.8), and
  - Safety Data Sheets for any hazardous materials brought on site (Ref. OHSA s.37).
- Copy of job hazard assessment for all operations. Bestco Construction Ltd. will require that all Contractors conduct a hazard assessment such that all safety and environmental conditions pertaining to the Project

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are reported and outlined. Hazards should be rated according to risk level or have a consistent risk rating system. In addition to the hazards, appropriate evidence of measures to control these hazards must be provided. This must be aligned with Bestco Construction Ltd.'s **Hazard Assessment, Analysis and Control Procedure (BESTCO-PRO-02.0) and Controls Procedure (BESTCO-PRO-03.0)**.

- Copy of Safe Job Procedure(s) for Critical Task(s) and Rescue Plans (i.e., Confined Space, Working at Heights, Hot Work, or Lockout)
- Training records of mandatory health and safety training and job specific trainings:
  - Health and Safety Awareness in accordance with the OHSA (O. Reg. 297/13).
  - WHMIS 2015
  - Workplace violence and harassment in accordance with the OHSA (Ontario, Bill 168).
  - Integrated Accessibility Standards in accordance with the AODA (O. Reg. 191/11).
  - Job specific training records (E.g., Working at Heights, Confined space, etc.) must be provided upon request.

(d) **Level 4**

In addition to all the requirements for Levels 1, 2, and 3, the Level 4 Contractor must provide the following information:

- Health & Safety Project plan


#### **4.5. Renewals of Required Documentation**

The following documentation shall be renewed as required:

1. Every 90 days, a new WSIB Clearance Certificate
2. Annually, proof of 3rd party liability insurance (based on the date of the policy)
3. Every 3 years, a new Contractor Acknowledgement form

#### **4.6. Contractor Requirements**

Levels 2, 3 and 4 Contractors/service providers must comply with the Bestco Construction Ltd. "Pre-Qualification" requirements and meet the minimum requirements as outlined below.

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Note: This is a Zero Tolerance facility for workplace violence and/or harassment. Any contractor, service provider or contractor representative demonstrating such behaviour will be asked to leave the facility and not return. An investigation will be conducted, and the contractor will be notified of the results.

(a) Level 1


1. Contractors/service providers shall be informed of Bestco Construction Ltd. site H&S requirements.
2. Safety Data Sheets (SDSs) for any hazardous materials brought on site, must be readily available.

(b) Level 2

In addition to all the requirements for Level 1, Level 2 contractors/service providers must participate in the facility's H&S program, including:

1. Comply with all applicable laws, standards, rules, and regulations regarding health & safety, including but not limited to the Provincial Health & Safety legislation and all applicable regulations;
2. Comply with all Bestco Construction Ltd. policies, procedures, and work instructions applicable to contractors/service providers;
3. Ensure the contractor/service providers, its employees and subcontractors are competent with respect to the performance of any work and operation of any equipment required;
4. Ensure to assess/analyze and control hazards arising from their own work that may impact the organization's workers and from the organizations work that may impact the contractor's workers;
5. Site specific hazard assessments which demonstrate appropriate job specific controls;
6. Ensure that all employees of the contractor/service providers supervising any work on Bestco Construction Ltd. premises are competent, and shall provide documentation supporting the claim of competency;
7. Supply all tools, equipment, personal protective equipment, and other devices required to perform work;
8. Maintain all tools, equipment, personal protective equipment, and other devices mentioned above in good, safe working condition;
9. Provide all applicable records and documentation to support the training, knowledge and/or competency of the contractor/service provider, its employees or subcontractors to perform work upon request;




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10. Ensure the contractor/service providers, its employees or subcontractors work in a manner that does not endanger themselves, another person, or the environment;
11. Ensure the contractor/service providers, its employees or subcontractors have reviewed and understand the facility H&S Policy as enclosed in the contractor package;
12. Wear all personal protective equipment or devices required by Bestco Construction Ltd. to be worn, and shall not make ineffective said equipment;
13. Report to Bestco Construction Ltd. any absence of, or defect in, any personal protective equipment, equipment, guarding or other protective device of which they are aware and that may endanger themselves, another person, or the environment;
14. Process for ensuring that all incidents at Bestco Construction Ltd. facilities (fatality, lost time, modified work, medical aid, first aid, environmental releases, and near miss) are reported;
15. Process for ensuring the investigation of all incidents (fatality, lost time, modified work, medical aid, first aid, high potential environmental and near miss) occurring at the workplace;
16. All contractor/service providers are responsible for training for their workers and representatives on workplace violence and harassment. At any time, the contractor/service providers may be asked to provide evidence of such training;
17. All contractor/service providers are responsible for training their workers, supervisors and representatives on Health and Safety Awareness in accordance with the Occupational Health and Safety Awareness and Training (O. Reg. 297/13). At any time, the contractor/ service provider will be required to provide evidence of such training;
18. All contractor/service providers are responsible for training their workers and representatives on Integrated Accessibility Standards in accordance with the AODA (O. Reg. 191/11). At any time, the contractor/ service provider may be asked to provide evidence of such training. Small organizations with 1-49 employees may be exempt from providing evidence, as they are not required to keep a record of training;

(c) Level 3

In addition to all the requirements for Levels 1 and 2, the Level 3 contractor/service provider H&S Program shall include:



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1. Confirmation that the contractor/service provider's personnel have received appropriate, and up to date training from their employer for activities to be performed on site and acknowledgment that training must be completed for operation of equipment and high-risk activities such as fall protection, respiratory protection, etc. Training records may be requested by Bestco Construction Ltd. before commencement of work activities.
2. Records demonstrating an appropriate site inspection process is in place and regularly followed as per specific requirements.
3. Site specific orientation training to ensure that the contractor/service provider's personnel are aware of site-specific hazards and are in a position to instruct their employees, subcontractors and visitors for project specific requirements prior to physical work commencing.
4. Site specific hazard assessments which demonstrate appropriate job specific controls.

(d) Level 4

In addition to all the requirements for Levels 1, 2, and 3, the Level 4 contractor/service provider H&S Program shall include:


1. Identification of a designated Contractor H&S manager and site H&S representatives along with a description of their project H&S duties and experience.
2. The site-specific H&S Plan identifying contractor/service provider activities which aligns with and meets project and regulatory H&S requirements.

#### 4.7. Pre-Commencement

Bestco Construction Ltd. shall ensure that any contractors to perform work at any facility have the proper documentation to allow them to work. Senior Management will send all H&S documentation to a prospective contractor and use the **Contractor/Service Provider Pre-Commencement Checklist** to track the documentation received before any work can begin.

#### 4.8. Contractor Orientation

Bestco Construction Ltd. will implement contractor orientation for the following validation of required documents and prior to the contractor starting work at a

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Bestco Construction Ltd. site. A project kick-off meeting will take place with Bestco Construction Ltd.'s assigned supervisor/manager as required, to review elements:

- Emergency planning arrangements
- Hazardous work permit procedures
- Contract employee supervision arrangements
- Accident notice and investigation requirements
- Hazard assessment and control procedures, and
- Health and safety issue resolution procedures
- Site orientation process for workers

Individual workers will be oriented using the **Site Orientation form**.

All new Bestco Construction Ltd. supervisors will be provided with information related to contractor management and their role and responsibility during orientation.

#### 4.9. Performance monitoring

The site supervisor must have effective processes in place to monitor and manage the H&S performance of contractors/service provider who are engaged in work for Bestco Construction Ltd.


The Approved Contractor shall take all steps as highlighted in section 4.5 above to ensure all necessary precautions are taken to protect their workers while working on a Bestco Construction Ltd. site.

##### (a) Accident Reporting

The site supervisor must be made aware of any potential and occurring accidents or injury on site no matter the degree of event. All Contractors must report all incidents that occur while working on a Bestco Construction Ltd. site. Wherein an accident is determined to be reportable according to site supervisor's best judgement, the **Accident/Incident Reporting Form** will be completed and an investigation for the event will be completed. Refer to the **BESTCO-PRO-10.0 Investigation and Reporting Procedure** for more information.

##### (b) Bestco Construction Ltd. Toolbox talks

Contractors are required to attend weekly toolbox talks conducted by Bestco Construction Ltd. site supervisor when applicable. Name, signatures, and dates will be recorded in the **Toolbox talk Form** in **4SafeCom™**.

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(c) Weekly Forms Periodic Site Inspections and Infractions

Bestco Construction Ltd. staff may periodically enter the workplace or worksite to inspect the work that is being carried out, to ensure that all Contractors and Contractors are complying with all legislative and Bestco Construction Ltd. requirements.

If a legislative requirement or Bestco Construction Ltd. health and safety rule is violated, the Bestco Construction Ltd. staff shall ensure that the following is carried out:

- The site supervisor will inform the Contractor and/or Service Providers by submitting a **Contractor/Service Provider Violation Form**.
- If the safety violation is immediate or reasonably foreseeable and is dangerous to the life or health of any Contractor Personnel, Bestco Construction Ltd. staff member, the public, or Bestco Construction Ltd. property, then the Bestco Construction Ltd. site supervisor shall have the authority to stop work immediately.
- The Bestco Construction Ltd. site supervisor shall then follow up with the Contractor in writing and request corrective action to be taken immediately. Work shall only commence again once Bestco Construction Ltd. is satisfied that:
  - The safety violation has been addressed and resolved.
  - Appropriate measures have been put in place to prevent recurrence

(d) Further, Construction Contractors must fulfill the following requirements:


(i) Daily

Construction contractors are to submit Pre-job Safety Assessments (PSAs) to Bestco Construction Ltd. or participate in Bestco Construction Ltd. PSA as determined prior commencement of project. The PSA must identify the hazards of their work on that day and the controls in place to mitigate them.

(ii) Weekly

On a weekly basis, contractors will conduct and submit to supervisor, documented evidence of:

- **Toolbox Talks:** Toolbox talks must be pertinent, relevant, and related to the task at hand.

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- **Site Inspection:** Findings from site inspections along with remedial measures to be discussed

The documents must be submitted to the Bestco Construction Ltd. site supervisor before the end of each week.

(iii) Pre-use

Contractors are to perform equipment pre-use inspection prior to commencing work. The documents pertaining to this equipment must be available for verification.

#### 4.10. Nonconformities

Bestco Construction Ltd. will monitor and track unsafe work conditions or non-conformities that are applicable to all Approved contractors/service providers and based on site H&S requirements.

#### 4.11. Performance Evaluation

Evaluation of contractors/service providers may be conducted at intermittent stages of the contract. These evaluations will be assessed to determine the safety performance levels of each contractors/service provider based on incidents recorded at the project sites.

The H&S Manager/Coordinator will review all contractors and service providers as necessary, but at a minimum of once annually, or after a reportable incident.


Contractors/service providers with a high number of incidents (exceeding a threshold set by Bestco Construction Ltd. and poor conduct may be disqualified from future contract considerations.

#### 4.12. Post-Performance Evaluation

A full evaluation of all Level 3 and 4 contractors will be conducted upon completion of the awarded contract for short-term contracts (1 year or less) and at least annually for long-term (1+ year) contracts using **Post-Performance Evaluation Form**.

This evaluation will be used to help verify that Bestco Construction Ltd. continues to partner with safe Contractors.

#### 4.13. Contractor Retainment

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Bestco Construction Ltd. will maintain files and records of contractor selection, monitoring, and evaluation through a **Contractor/Service Provider Evaluation Form**. The form is to be maintained in the Office. Retained documentation will serve as a basis for future contracting and service positions and procurement procedures.

Bestco Construction Ltd. retains the rights to offer or reject future positions based on experience of past projects and documentation provided. Contractors/service providers weekly with a high number of incidents (exceeding a threshold set by the client) and poor conduct may be disqualified from future contract considerations.

#### 4.14. Site specific OHS requirements

Bestco Construction Ltd. appoints supervisors for all the workplaces to lead the coordination of OHS requirements where multi-employers, inclusive of contractors and service providers are employed for Bestco Construction Ltd. services. The OHS requirement shall be in compliance with **BESTCO-PRO-13.0 - Legislation and Other Requirements Procedure**.

#### 4.15. Communication

The Contractor Management Policy and Procedure shall be communicated to all applicable Bestco Construction Ltd. employees, contractors as required. Bestco Construction Ltd. will ensure that communication with all workplace parties will be notified when there are changes affecting the health and safety of the work.


Project Manager/Site Supervisors will be the primary personnel communicating between Bestco Construction Ltd. and contractor.

When the scope of a project changes, Bestco Construction Ltd. will ensure that any new or potential hazards are appropriately assessed and controlled, and that the documentation supporting these changes is obtained and communicated to all parties through site meetings/toolbox talks, and memos.

## 5 Roles and Responsibilities

Responsibilities and accountabilities of workplace parties ensures a commitment by workplace parties ensuring a safe and healthy work environment. The responsibilities of workplace parties are outlined as per the Organization Chart and listed below with the specific roles within the organization.

### 5.1. Senior Management

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- Ensure compliance of the procurement and contractor management policy and procedure by all workplace parties.
- Provide support for the implementation and delivery of the Contractor Management Program.
- Ensure that all resources including applicable resources (competent workplace parties, tools, equipment, and supplies), time and budget required for the compliance of this policy and procedure are provided.
- Ensure that all relevant workplace parties are trained on the Procurement and Contractor Management Program.
- Responsible for selection, monitoring and evaluation of contractors and service providers.
- Maintain documentations related to Procurement and Contractor Management
- Follow up with contractors and/or service providers, as applicable.


## **5.2. Project Managers/Supervisors**

- Ensure that the contractors who will be onsite follow the site-specific safety rules.
- Notify the senior management and the contractor of any possible infractions immediately for investigation purposes.
- Ensure that the contractors on site are aware of the requirements and changes of this policy and program.
- Ensure contractors follow the requirements of this policy/program, and ensure that their workers, are trained in this policy/program and comply with the various requirements.

## **5.3. Contractors/Service Providers**

- Comply with the requirements of this policy/program, and ensure that their workers, including Contractors, are trained in this policy/program and comply with the various requirements.
- Ensure that all employees on site are trained and hold valid training certificates.
- Complete onsite orientation for employees on site.  
Provide all required documentation as outlined in this procedure upon request.

# **6 Related Documents/Forms**

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- Contractor/Service Provider List
- Contractor/Service Provider Pre-Qualification Form
- Contractor/Service Provider Evaluation Form
- Contractor/Service Provider Acknowledgement Form
- Contractor/Service Provider Pre-Commencement Checklist/ Contractor/Service Provider H&S Checklist
- Contractor/Service Provider Post Performance Evaluation Form
- Contractor/Service Provider Violation Form
- Pre-job Safety Assessment Form (PSA)
- Accident/Incident Reporting Form
- Toolbox Talk Form
- Site Orientation form
- BESTCO-PRO-01.2-Document and Record Control Procedure
- BESTCO-PLY-02.0 - Hazard Assessment, Analysis and Control Policy
- BESTCO-PRO-02.0 - Hazard Assessment, Analysis and Control Procedure
- BESTCO-PLY-03 - Controls Policy
- BESTCO-PRO-03 - Controls Procedure
- BESTCO-PRO-10.0 - Investigation and Reporting Procedure
- BESTCO-PRO-13.0 Legislation and Other Requirements Procedure

## 7 Document and Record Maintenance

Documents and Records are maintained as per **BESTCO-PRO-01.2-Document and Record Control** Procedure.


## 8 Record Retention

Records of related documents are to be retained for a minimum of 3 years. Records will remain legible and readily identifiable.

## 9 Legislated/Other References


- Duties of employers – Occupational Health and Safety Act, s. 25
- Workplace Violence and Harassment – Occupational Health and Safety Act, s. 32.0.1-32.0.8
- O. Reg. 297/13: Occupational Health and Safety Awareness and Training under Occupational Health and Safety Act
- O. Reg. 191/11: Integrated Accessibility Standards under Accessibility for Ontarians with Disabilities Act, 2005



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- WHMIS-2015
- Workplace Safety and Insurance Board (WSIB) Requirement
- Other applicable Acts and Regulations
- IHSA COR™ 2020 Guidelines



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## Company Rules Policy

The management of Bestco Construction Ltd. understands the importance of governing the conduct and actions of all workplace parties. Senior Management of Bestco Construction Ltd. will take accountability in developing and enforcing both the standard company and work location-specific rules throughout the company. This Policy shall be accompanied by the Company Rules Procedure. Bestco Construction Ltd. will also implement a progressive disciplinary process to ensure and maintain compliance in the workplace.

Senior Management is committed to providing time, budget, and resources to develop and implement Company Rules. Senior Management will ensure that company-wide and site-specific rules are developed and made available to all workplace parties. Bestco Construction Ltd. will ensure both company-wide and site-specific rules are communicated to and understood by all workers.

All supervisors must ensure that workers under their supervision are working in compliance with the established company-wide and site-specific rules. Supervisors are to ensure the Company Rules are being followed and consistently enforced throughout the company. Supervisors shall ensure workers are oriented and trained on location and content of company rules prior to working on site. The progressive disciplinary process will be activated by the supervisors every time a rule is violated.

All Bestco Construction Ltd. workers, visitors, and contractors/subcontractors must follow the established company-wide and site-specific rules. Workers must inspect their workplace prior to commencing work and note any hazardous conditions on the site. All workplace parties can consult the health and safety board to find standard and work location written company rules and visibly posted. All workplace parties can also request their own personal copy from Bestco Construction Ltd.'s Health and Safety Representative/JHSC (if applicable).

The program and its performance shall be reviewed annually for sustainability, adequacy, and effectiveness.




Name: Michael Zaborsky

Title: President

Company: Bestco Construction (2005) Ltd.


Sept. 2, 2025

Date: 02 September, 2025

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# Company Rules Procedure

<b>Version No.</b>	<b>Reason for Revision:</b>	<b>Developed By and Date:</b>	<b>Reviewed By and Date:</b>	<b>Approved By and Date:</b>
1	To meet COR 2020 Standards, company's health and safety processes and Ontario's Health and Safety Legislative Requirements.	Emma Lisson, Health and Safety Coordinator 11 July, 2025	Michael Zaborsky and Ovidiu Cotiga, Senior Management 18 August, 2025	Michael Zaborsky, President 02 September, 2025

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## 1 Purpose

Bestco Construction Ltd. has developed the Company Rules program to establish and communicate the company's expectations for personal conduct to all workplace parties.

## 2 Scope

The Company Rules policy and procedure applies to all work or work-related activities performed under the control of the organization by all workplace parties.

## 3 Definitions

**Compliance:** Meeting all requirements outlined within applicable legislation and regulations. [Ref. COR 2020 Audit Handbook].

**Conformity:** Fulfillment of a requirement. [Ref. COR 2020 Audit Handbook].

**Contractor:** A person or organization providing services to another organization in accordance with agreed upon specification, terms, and conditions. [Ref. COR 2020 Audit Handbook].


**Document:** Medium containing information related to the OHSMS. [Ref. COR 2020 Audit Handbook].

**Hazard:** Source, situation, or act with a potential for harm in terms of human injury. [Ref. COR 2020 Audit Handbook].

**Incident:** Work related event(s) in which an injury, fatality or occupational illness occurred; and includes event(s) where no injury or illness occurred, such as a near hit or property damage. [Ref. COR 2020 Audit Handbook].

**Legal Requirements:** All applicable legislation, including but not limited to the Occupational Health and Safety Act and its regulations. [Ref. COR 2020 Audit Handbook].

**Occupational Health and Safety (OHS):** Conditions and factors that affect or could affect the health and safety of employees or other workers, inclusive of temporary workers and contractor personnel, visitors, suppliers, vendors, or any other person in the workplace. [Ref. COR 2020 Audit Handbook].

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**Occupational Health and Safety Management System (OHSMS):** As defined in the OHSA “means a coordinated system of procedures, processes and other measures that is designed to be implemented by employers to promote continuous improvement in occupational health and safety. [Ref. COR 2020 Audit Handbook].

**Organization:** Company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public, or private, that has its own functions, management, and administration. [Ref. COR 2020 Audit Handbook].

**Other Requirements:** Requirements or provisions the organization subscribes, however are not legally binding, such as industry standards. [Ref. COR 2020 Audit Handbook].

**Policy:** A policy is a general commitment, direction or intention and is formally stated by top management. A quality policy statement should express top management's commitment to the implementation and improvement of its management system. [Ref. COR 2020 Audit Handbook].

**Procedure:** A documented, specified method to carry out an activity. **Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].

**Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].


**Record:** Document stating results achieved or providing evidence of activities performed. [Ref. COR 2020 Audit Handbook].

**Workplace:** any land, premises, location, or thing at, upon, in or near which a worker works. [Ref. OHSA].

**Workplace Parties:** Includes, but is not limited to, the employer, supervisor(s), workers, constructor, visitors, and owner. [Ref. COR 2020 Audit Handbook].

## 4 Procedure

Senior Management of Bestco Construction Ltd. shall establish the Company Rules program to set out the guidelines that all workplace parties must understand and work in accordance with. Where an infraction has occurred, management will refer to the Progressive discipline procedure for subsequent steps.


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#### 4.1. Company Rules

It is the policy of Bestco Construction Ltd. to ensure that all workplace parties understand and strictly adhere to the provisions of the Occupational Health and Safety Act, all applicable regulations, legal and other requirements, company practices and procedures.

The rules listed below are the fundamental company rules. Your manager/supervisor will inform you of any additional project specific rules, if required.


1. If you notice any unsafe practice or condition on the job, you are obligated by law and by the company to report the situation immediately to your supervisor so that corrective action can be taken.
2. All injuries and accidents/incidents, no matter how minor, must be reported immediately to your supervisor. The supervisor will conduct his/her investigation and report it to management.
3. All relevant personal protective equipment must be worn when required. Personal protective equipment must be inspected prior to each use.
4. All work shall be carried out as per the Occupational Health and Safety Act, applicable regulations, company practices and procedures.
5. Workers are to provide supervisors with advance notice, if possible, for any absences or late arrivals.
6. The workplace must remain in a clean and orderly condition. Proper housekeeping must take place throughout the workplace to eliminate potential hazards.
7. No possession or consumption of alcohol or illegal drugs is permitted while at the workplace. Non-medical use and possession of drugs are not permitted in the workplace.
8. Bestco Construction Ltd. has the duty to accommodate medical cannabis use contingent upon:
  - a) Prescription for medical cannabis does not impair the worker from doing their work.
  - b) Prescription for medical cannabis does not affect the health and safety of the worker and the safety of others.
  - c) Prescription for medical cannabis does not entitle the worker to smoke in the workplace.
  - d) Prescription for medical cannabis and other prescription medication does not entitle the worker for unexcused absences, late arrivals or company and legislative infractions.
9. Smoking is strictly prohibited near flammable or combustible gases and materials, and in all storage areas.

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10. Fighting, horseplay, practical jokes or otherwise interfering with other workers is prohibited.
11. Theft, vandalism or any other abuse or misuse of any property is prohibited.
12. Tools and equipment shall be inspected before each use and shall only be used if in good condition. Do not remove any guards or safety devices.
13. Do not operate any machinery unless you have been properly trained for the task.
14. Always seek assistance or use mechanical lifting devices when attempting to lift heavy material.
15. Avoid awkward positions and always lift with the legs, not your back.
16. When in doubt, do not attempt any work that you feel is unsafe or may place yourself or others in danger. If you feel incapable of performing a task, advise your supervisor.
17. All substandard performance and behaviour will be governed by our progressive disciplinary program. Refer to section **4.2 Progressive Discipline Procedure** for more details. Procedure is escalated accordingly as follows:
  - a) Verbal Warning
  - a) Written Warning
  - b) Workplace Suspension
  - c) Termination of Employment
18. For the protection of each worker, the following guidelines must be followed regarding daily attire at construction sites, shop/ warehouse:
  - b) Basic Personal Protective Equipment (PPE) must be worn daily.
  - c) Specialised PPE must be worn dependant on task.
  - d) Do not wear loose clothing or cuffs.
  - e) Do not wear greasy or oily clothing, gloves, or boots.
  - f) Do not wear torn or ragged clothing.
  - g) Do not wear finger rings, bracelets, or neck chains.
  - h) Long hair must be neatly tied back.
  - i) Do not wear shorts.

#### **4.2. Requirement to Comply**

It is the policy of Bestco Construction Ltd. to ensure that all all-workplace parties understand and strictly adhere to the provisions of the Occupational Health and Safety Act, all applicable regulations, legal and other requirements, company practices and procedures. All workplace parties shall adhere to company rules, and site-specific rules, if applicable.

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#### 4.3. Progressive Disciplinary Procedure

Bestco Construction Ltd. believes in the importance of good personnel conduct and the seriousness of complying to company rules. In the event of an infraction, steps will be made to communicate the deficiency and where needed disciplinary measures will be applied. If infraction indicates larger health and safety issues, it is up to management and supervisor's best discretion to review safe working habits with all relevant workplace parties.

Good behaviour of workers is recognized by Bestco Construction Ltd. Workers that have provided additional insight on possible hazards or have consistently demonstrated safe and professional conduct should be recognized.

When a worker is found to be in violation of these rules, the supervisor must take action to stop the inappropriate behaviour and prevent a dangerous situation from occurring. Necessary steps will be determined by the severity of the actions being addressed. Supervisors are responsible for following this process to maintain acceptable levels of performance, conduct and workplace safety.

Bestco Construction Ltd. reserves the right to combine or skip steps depending on the facts of each situation and nature of the offense. Disciplinary action taken will be consistent with the seriousness of the infraction. Some of the factors that will be considered include, but are not limited to, repeat violation despite coaching, counseling and/or training; the employee's work record; and the impact the conduct and performance issues have on Bestco Construction Ltd.

The following guideline outlines the disciplinary action will employ for any company rule and safety infractions. These actions will not necessarily be implemented progressively. Disciplinary action taken will be consistent with the seriousness of the situation.


Supervisors must fill out a **Disciplinary Warning Form** when giving any type of warning to workers (verbal and written).

##### (a) Verbal Warning

In the opinion of the Supervisor, if the violation is minor in nature and does not directly endanger the well-being of any person in the workplace. The following will occur:

- Disciplinary action will consist of a mandatory discussion with Supervisory Staff regarding the violation.



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- The Supervisor will document violations resulting in a verbal warning.

(b) Written Warning

In the opinion of the Supervisor, if the violation is major in nature, and directly endangers the wellbeing of any person in the workplace, a written warning will be issued. The following will occur:

Disciplinary action will consist of a mandatory discussion with the Supervisor regarding the violation. Additionally, a formal written warning will be issued for the violation.

(c) Workplace Suspension

In the opinion of the Supervisor, if the violation is major in nature, directly endangers the wellbeing of any person and not be tolerated in the workplace. The supervisor may determine a workplace suspension as the next step in the disciplinary procedure.

Repeated disciplinary violations including written warnings could also lead to possible suspensions.


(d) Termination of Employment

Termination of employment is the final step in the progressive disciplinary process. This step may involve supervisors, managers as well as Senior Management.

If the violation represented a serious safety concern/level of neglect the organization may exercise a zero-tolerance policy which could lead to termination without the previous steps having been exercised. The following violations are examples, but not limited to, that could lead to termination:

- Possessing firearms and/or other weapons on project
- Possession of or being under the influence of illegal drugs or alcohol on the project site.
- Workplace violence and harassment
- Failure to replace handrails, barriers, covers or protective devices, including safety signs.
- Engaging in horseplay which causes injury or property damage.
- Tampering with fire-fighting equipment

#### 4.4. Communication

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Bestco Construction Ltd. will ensure that all company and project specific rules are available to all workplace parties. The written rules are posted on the safety boards/job binders/4SafeCom™. Rules are clearly explained to workers in a way that they understand them. Acknowledgement by worker is achieved through orientation form. Further, the Bestco Construction Ltd. will ensure that all workplace parties are aware of the company rules, work specific rules and the importance of compliance. Management and supervisors will ensure all workers understand their duties to comply with the company rules and are aware of the progressive discipline process.


- All new hires will be oriented with Company Rules as part of new employee orientation. The orientation will include existing Company Rules as well as the company's Progressive Discipline Procedure. Bestco Construction Ltd. shall maintain evidence of orientation for all new all workplace parties using **New Hire Orientation Form**.
- Ensure workers are oriented on where they can find the Company Rules and Progressive discipline procedure.
- Supervisors will ensure all workers under their supervision understand all company and work specific rules prior to commencing work. This will be done frequently or as required, through site orientations, safety talks, toolbox talks, company-wide meetings, etc.

## 5 Roles and Responsibilities

Responsibilities and accountabilities of workplace parties ensures a commitment by workplace parties ensuring a safe and healthy work environment. The responsibilities of workplace parties are outlined as per the Organization Chart and listed below with the specific roles within the organization.

### 5.1. Senior Management

- Establish general company-wide rules as well as site-specific rules and make available to all work personnel (Post on safety board and/or provide copy to each employee).
- Enforce compliance with Company Rules and Legislation.
- Ensure the appropriate tools and resources are provided to train all workers to perform work in a manner which is safe and compliant with the established rules.
- Establish a progressive disciplinary program to correct inappropriate behavior.

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- Ensure supervisors are competent to apply the rules and corrective actions consistently.
- Review company rules and progressive discipline policy and procedure annually to ensure their continued adequacy in protecting workers from preventable harm.
- Assist with any disciplinary actions as required (i.e., suspension or termination).
- Provide training through documentation review on Disciplinary Policy and Procedure

## 5.2. Managers/Supervisors

- Follow the Company Rules and abide by the Progressive Discipline Procedure to maintain acceptable levels of performance, conduct and workplace safety.
- Ensure the company rules and progressive discipline procedure is clearly communicated to each worker as part of orientation prior to the commencement of work.
- Take every precaution reasonable in the circumstances for the protection of a worker.
- Monitor workers to ensure company rules are followed and implement the disciplinary procedure, as required.
- Fill out the Disciplinary Warning Form, as required.
- Determine the reasonable level of discipline needed for the worker infraction and communicate the infraction to the offending worker.
- Ensure workers are oriented on where they can find the Company Rules and Progressive discipline procedure.
- Address performance and disciplinary issues in a consistent and timely manner with all workplace parties.

## 5.3. Workers

- Awareness, understanding, compliance to and acknowledgement of Company Rules and site-specific rules.
- Understand Progressive Disciplinary Program and repercussions of working unsafely.
- Take every reasonable precaution to correct the actions or behaviour as discussed with the supervisor.
- Report all non-compliances to Company Rules.
- Cooperate with their supervisor through the disciplinary process.

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#### 5.4. Visitors, Contractors, and Service Providers

- Comply with company and site-specific rules and regulations.
- Participate in orientations as required.

## 6 Related Documents/Forms

- BESTCO-PRO-01.2-Document and Record Control Procedure
- Project Specific Rules, if applicable
- BESTCO-PLY-05.0-Company Rules Policy
- Disciplinary Warning Form
- Toolbox talk Form
- New Employee Orientation Form
- Site Orientation Form

## 7 Document and Record Maintenance


Documents and Records are maintained as per **BESTCO-PRO-01.2-Document and Record Control Procedure**.

## 8 Record Retention

Records are to be retained for a minimum of 3 years. Records will remain legible and readily identifiable.

## 9 Legislated/Other References

- Duties of employers – Occupational Health and Safety Act, s. 25, 26
- Duties of constructors – Occupational Health and Safety Act, s. 23
- Duties of supervisors – Occupational Health and Safety Act, s. 27
- Duties of workers – Occupational Health and Safety Act, s. 28
- Occupational Health and Safety Act, s. 50
- Occupational Health and Safety Act, s. 63
- IHSA COR™ 2020 Guidelines

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## Personal Protective Equipment Policy

Bestco Construction Ltd. is vitally interested in the health and safety of its workers. The use of personal protective equipment (PPE) is necessary to help prevent serious injury or illness by eliminating or minimizing exposure to hazards. Bestco Construction Ltd. will assess the exposure to workplace hazards and determine the appropriate PPE required.

Senior Management of Bestco Construction Ltd. is committed to providing the necessary budget, time, and resource for establishing and maintaining the PPE program. Senior Management will ensure that workers are informed of the required PPE for all tasks and receive any required training prior undertaking such tasks. Senior Management will ensure that all workplace parties have required mandatory, basic, and specialized PPE.

Site Supervisors of Bestco Construction Ltd. will be held accountable for the health and safety of workers under their supervision and will provide required PPE to their workers. Supervisors are also required to provide workers with site specific PPE training, and ensure workers comply with the site PPE requirements.

All workers of Bestco Construction Ltd. must comply with the PPE Policy for the work location. PPE must be worn where required. The maximum degree of protection offered by basic and specialized PPE will be achieved only if the equipment is right for the job, fitted properly, used properly, and maintained properly.

The required PPE for each job task shall be determined by the Job Hazard Analysis, Safety Data Sheets (SDSs), as well as applicable legislation.

Any violation of the personal protective equipment requirements will result in disciplinary action.

The program and its performance shall be reviewed annually for sustainability, adequacy, and effectiveness.




Name: Michael Zaborsky

Title: President

Company: Bestco Construction (2005) Ltd.


Sept. 2, 2025

Date: 02 September, 2025

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# Personal Protective Equipment Procedure

<b>Version No.</b>	<b>Reason for Revision:</b>	<b>Developed By and Date:</b>	<b>Reviewed By and Date:</b>	<b>Approved By and Date:</b>
1	To meet COR 2020 Standards, company's health and safety processes and Ontario's Health and Safety Legislative Requirements.	Emma Lisson, Health and Safety Coordinator 11 July, 2025	Michael Zaborsky and Ovidiu Cotiga, Senior Management 18 August, 2025	Michael Zaborsky, President 02 September, 2025

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## 1 Purpose

The purpose of this procedure is to ensure that all relevant workplace parties receive appropriate information regarding Personal Protective Equipment (PPE) to protect their health and safety while performing their assigned duties at Bestco Construction Ltd. PPE is required to protect workers against hazards when other controls are not feasible, or to supplement other controls.

## 2 Scope

The Personal Protective Equipment (PPE) policy and procedure applies to all work or work-related activities performed under the control of the organization by workplace parties.

## 3 Definitions

**Competency:** A person performing a task for, or on behalf of, the organization is competent to do so by means of appropriate:

- Knowledge of the hazards and risks associated with the tasks for the operations and activities.
- Demonstrated understanding and working knowledge of the control measures associated with the hazards and risks.
- Training regarding the hazards, risks, and associated control measures d)  
Aptitudes, such as skillset, ability, and willingness to deal with the hazards, risks, and control measure.

[Ref. COR 2020 Audit Handbook].

**Competent Person:** A person who,


- a) is qualified because of knowledge, training, and experience to organize the work and its performance,
- b) is familiar with this Act and the regulations that apply to the work, and
- c) has knowledge of any potential or actual danger to health or safety in the workplace.

[Ref. OHSA].

**Competent Worker:** In relation to specific work, means a worker who,

- a) is qualified because of knowledge, training, and experience to perform the work,
- b) is familiar with the Occupational Health and Safety Act and with the provisions of the regulations that apply to the work, and
- c) has knowledge of all potential or actual danger to health or safety in the work.



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[Ref. O. Reg. 213/91: Construction Projects under OHSA].

**Compliance:** Meeting all requirements outlined within applicable legislation and regulations. [Ref. COR 2020 Audit Handbook].

**Contractor:** A person or organization providing services to another organization in accordance with agreed upon specification, terms, and conditions. [Ref. COR 2020 Audit Handbook].

**Document:** Medium containing information related to the OHSMS.

**Hazard:** Source, situation, or act with a potential for harm in terms of human injury. [Ref. COR 2020 Audit Handbook].

**Legal Requirements:** All applicable legislation, including but not limited to the Occupational Health and Safety Act and its regulations.

**Occupational Health and Safety (OHS):** Conditions and factors that affect or could affect the health and safety of employees or other workers, inclusive of temporary workers and contractor personnel, visitors, suppliers, vendors, or any other person in the workplace. [Ref. COR 2020 Audit Handbook].


**Occupational Health and Safety Management System (OHSMS):** As defined in the OHSA “means a coordinated system of procedures, processes and other measures that is designed to be implemented by employers to promote continuous improvement in occupational health and safety. [Ref. COR 2020 Audit Handbook].

**Organization:** Company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public, or private, that has its own functions, management, and administration. [Ref. COR 2020 Audit Handbook].

**Policy:** A policy is a general commitment, direction or intention and is formally stated by top management. A quality policy statement should express top management's commitment to the implementation and improvement of its management system. [Ref. COR 2020 Audit Handbook].

**Procedure:** A documented, specified method to carry out an activity. [Ref. COR 2020 Audit Handbook].

**Project:** a construction project, whether public or private, including,

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- a) the construction of a building, bridge, structure, industrial establishment, mining plant, shaft, tunnel, caisson, trench, excavation, highway, railway, street, runway, parking lot, cofferdam, conduit, sewer, watermain, service connection, telegraph, telephone or electrical cable, pipe line, duct or well, or any combination thereof,
- b) the moving of a building or structure, and
- c) any work or undertaking, or any lands or appurtenances used in connection with construction.

[Ref. OHSA].

**Record:** Document stating results achieved or providing evidence of activities performed.  
[Ref. COR 2020 Audit Handbook].

**Workplace:** any land, premises, location, or thing at, upon, in or near which a worker works. [Ref. OHSA].

**Workplace Parties:** Includes, but is not limited to, the employer, supervisor(s), workers, constructor, visitors, and owner. [Ref. COR 2020 Audit Handbook].

## 4 Procedure


### 4.1. Personal Protective equipment

The purpose of Personal Protective Equipment (PPE) is to protect workers from physical hazards and/or health hazards on the job. Equipment such as hard hats, safety glasses, and safety boots are designed to prevent an injury or reduce the severity of an injury if one occurs. PPE, such as hearing and respiratory protection, is designed to prevent illnesses to the worker's health. It is important to remember that PPE is designed to reduce risk, but it cannot eliminate the hazard. The best way of protecting workers is to control the hazard at the source or along the path. If that is not possible, controls need to be put in place at the worker level, which is known as the "hierarchy of controls".

The required PPE for each job task has been determined by the Job Hazard Analysis, Safety Data Sheets (SDSs), legislations and applicable standards. Job Hazard Analysis addressing all tasks with required PPE will be available for all workers to review and acknowledge them prior to the job.

### 4.2. Legal and Other Requirements

Bestco Construction Ltd. shall ensure that PPE is provided and/or made available for specific activities, maintained in good condition, and used as prescribed.

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Senior Management shall ensure instructions are provided on what PPE is needed, and workers are trained on proper fitting, care, and use of PPE.

Supervisors shall ensure that workers wear PPE that Bestco Construction Ltd. requires to be worn.

Workers shall wear PPE that Bestco Construction Ltd. requires to be worn.

PPE varies by trade, job, and site conditions. Legal requirements for PPE also differ. Construction Projects Regulation (O. Reg. 213/91) under the Occupational Health and Safety Act (OHSA) refer to the Canadian Standards Association (CSA) or other equipment standards to identify equipment that meets the legal requirements and is acceptable. CSA-certified equipment can be identified by the CSA logo.

The manufacturer's guidelines must be strictly adhered in inspecting and maintaining PPEs. The commonly used PPE are listed below with their CSA standard.

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PPE	CSA Standard
Protective Footwear	CSA Z195:14 (R2019), CSA Z195.1-16
Protective Headwear	CSA Z94.1-15 (R2020)
High Visibility Vest	CSA Z96-15 (R2020) CSA Z96.1-08
Eye and face protectors	CSA Z94.3:20 CSA Z94.3.1-16
Hearing Protection Devices	CSA Z94.2-14 (R 2019)
Respirators	CSA Z94.4-18
Body Belts and Saddles for Work Positioning and Travel Restraint.	CSA-Z259.1-05 (R2020):
Fall Arresters and Vertical Lifelines	CSA-Z259.2.5-17
Self-Retracting Devices for Personal Fall-Arrest Systems	CSA-Z259.2.2-17
Descent Control Devices	CSA-Z259.2.3-16 (R2020)
Full Body Harnesses	CSA-Z259.10-18
Energy Absorbers	CSA-Z259.11-07:
Connecting Components for Personal Fall Arrest Systems (PFAS)	CSA-Z259.12-16 (R2021)
Active Fall Protection Equipment	CSA Z259.17:21
Arc flash Equipment (combination of other PPEs)	CSA Z462:21

#### 4.3. Hierarchy of Controls

Personal protective equipment (PPE) should be the last resort when considering ways to limit workplace hazards.

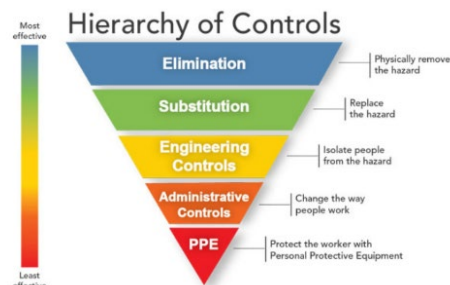



Figure 1 Hierarchy of Controls [source: NIOSH]

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When it is not possible to apply elimination, substitution, alternative work methods, isolation, enclosure and/or ventilation, personal protective equipment can be used as a last option.

#### 4.4. Activities requiring PPE

The required PPE for each job task has been determined by the Job Hazard Analysis, SDSs, as well as the legislation and standards. Activities requiring PPE are listed in **Job Hazard Analysis (JHA) Library**. A list of PPE required for each task is found in the **PPE Matrix**.

Pre-job Safety Assessment (PSA)s shall address daily activities in which the activities requiring PPEs are identified with PPE as controls.

#### 4.5. Selection of PPE


The selection criteria of PPE will incorporate the following:

- Legislative requirement.
- Job Hazard Analysis
- SDSs
- Manufacturer's guidelines.
- Codes of practice or Industry standards (E.g.: CSA Standards).

A list of PPE required for each task is found in the **PPE Matrix**.

#### 4.6. Types of PPE

- a) **Basic PPE:** The PPE that must always be worn by all personnel at a job site. This will include CSA- approved Safety Footwear (Safety boots with a green triangular tag), CSA-approved Hard Hat and CSA-approved safety vests. CSA-approved safety glasses shall be required based on the scope of work and the task-specific hazard.
- b) **Specialized PPE:** The PPE that is used only for specific jobs or for protection from specific hazards. This may include but not limited to face shields, goggles, gloves, arc flash protection, respiratory protection, fall protection system, hearing protection, etc. These specialized PPEs require specific training
- c) **Mandatory PPE:** Mandatory PPE for a site may be only basic PPE or a combination of basic and specialized PPE, based on the scope of work and the task-specific Job Hazard Analysis. The legislated requirements and SDS's will be incorporated as part of the Job Hazard Analysis.


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#### 4.7. Training and Records

- All workers will be made aware of the required PPE before beginning work.
- Workers will be informed of required PPE through orientations, hazard assessment reviews, safe work practices, safe job procedures, toolbox talks and/or site-specific training.
- Guidelines for proper fitting, care and use of PPE will be communicated and made available for workers.
- All workers who are involved in inspection and maintenance shall be trained.
- Worker training records on specialized PPE will be reviewed to ensure that PPE requirements have been addressed and are made available on site.
- All records will be maintained in 4SafeCom™.

#### 4.8. General PPE Requirements

- All PPE used by the company will be within the requirements of the Occupational Health and Safety Act and Regulations.
- All PPE will be selected, used, and maintained in accordance with the manufacturer's instructions, specifications, and requirements.
- All PPE will be inspected prior to each use.
- All PPE that is damaged or in need of service will be removed from service immediately.
- PPE shall not be used, modified, or changed contrary to manufacturer's instructions.
- Any violation of the personal protective equipment requirements will result in disciplinary action.
- All workers on constructions site are required to use the following PPE:
  - a) CSA Grade 1 safety footwear
  - b) CSA Class E hard hats (Type 2 recommended)
  - c) CSA-approved safety vest
- CSA-approved safety glasses shall be required based on the scope of work and the task-specific hazard.
- Specialized PPE like harnesses, respirators, hearing protection, etc. is made available and will be provided when needed.
- PPE will be inspected regularly for defects/damage and any defective equipment is removed from service.
- PPE requirements will be communicated to all new hires and to all contractors, service providers, visitors on site.
- Workers use the PPE required for the task they are performing.

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- Workers who refuse to wear or use PPE prescribed or required will be removed from the facility/site.
- Site Orientation will be given to new workers by the project supervisor or health and safety representative which includes the care and use of PPE as well as any specialized PPE training.
- All workplace parties are to identify any defective or overdue PPE and inform their supervisor immediately.

#### **4.9. Proper Fitting, Care and Use**

- PPE must fit each worker on an individual basis.
- Individual fitting programs should be carried out by competent personnel for specialized PPE. Refer to individual PPE Guidelines.
- Proper care is required for PPE to perform efficiently.
- The service life of PPE is affected by many factors, including temperature, chemicals, sunlight, and ultraviolet radiation.
- All PPE shall be CSA approved or of equivalent standard and in good working order.
- All employees will be trained on the limitations, proper care, and maintenance of their PPE by the management team.

Refer to PPE Guidelines for proper fitting, care, and use of individual PPE.


#### **4.10. PPE Inspection**

- All PPE will be inspected prior to each use as per the manufacturer's guidelines, legislative and other requirements.
- All the basic PPE is inspected during the daily Pre-Job Safety Assessment.
- Specialized PPEs are inspected using customized pre-use inspection checklists prior to use.
- Any defective equipment or equipment overdue for service must be removed from service.

#### **4.11. PPE Maintenance**

- Workers will be trained to maintain basic PPE.
- Specialized PPE will be maintained by competent worker or through service provider.
- PPE is maintained under **Preventative Maintenance Schedule** with previous maintenance date, maintenance frequency and next maintenance date.



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- PPE Maintenance schedule shall be maintained and updated frequently.
- Specialized PPE and basic PPE will be undergoing through the scheduled maintenance as per manufacturer's guidelines, legislative and other requirements.
- Only competent personnel will be conducting scheduled maintenance.
- Any defective equipment or equipment overdue for service must be removed from service.

#### 4.12. PPE Availability

- Employers are required to provide PPE as prescribed by legislation.
- Supervisors to ensure that PPE is made available for all the workplace parties.
- All workplace parties (management, supervisors, workers, contractors, service providers, suppliers, visitors, etc.) must ensure that appropriate PPEs are worn based on site requirement.


## 5 Roles and Responsibilities

Responsibilities and accountabilities of workplace parties ensures a commitment by workplace parties ensuring a safe and healthy work environment. The responsibilities of workplace parties are outlined as per the Organization Chart and listed below with the specific roles within the organization.

### 5.1. Senior Management

- Ensure compliance of the PPE policy and procedure by all workplace parties.
- Ensure all required PPE is provided to all workplace parties.
- Ensure all required PPE is maintained in good condition.
- Ensure PPE is used as prescribed.
- Ensure that safety kits and supplies are replenished as required.
- Ensure workers have area for storage of PPE, and direction on how to use equipment.
- Arrange for training related to specialized PPE for workers and maintain training records.
- Ensure written guidelines are available for proper fitting, care, and use of PPEs.
- Ensure manufacturers guidelines are available for all PPE.
- Ensure maintenance on PPE is carried out as per manufacturer's guidelines.




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## 5.2. Supervisors

- Identify the required PPE (basic and specialized) and communicate the same to all workplace parties.
- Ensure all mandatory PPE is worn by all workplace parties.
- Ensure that project specific required PPE is worn all time by management, supervisors, workers, contractors, service providers and visitors.
- Ensure PPE is used properly by all workers on site.
- Ensure PPE is stored, cleaned, maintained, and inspected as required.
- Review PPE compliance requirements with all workplace parties.
- Ensure written guidelines are available for proper fitting, care, and use of PPEs
- Provide adequate training to the workers on the proper fit, care, and use of PPE.
- Ensure workers who use specialized PPE are properly trained.
- Maintain training records.
- Ensure basic PPE are inspected as part of PSAs.
- Ensure appropriate checklists are used for specialized PPE inspection.
- Ensure manufacturers guidelines are available for all PPE.
- Ensure damaged PPE are replaced immediately and disposed of appropriately when brought to attention by worker.
- Communicate that failure to comply with the PPE requirements in the OHSA and construction regulations will result in disciplinary actions.

## 5.3. Workers

- Wear PPE (basic and specialized as required) as indicated by the supervisor/senior management.
- Wear additional PPE as required by the supervisor/senior management at projects.
- Participate in PPE training when applicable (respirators, hearing, fall protection, etc.).
- Visually inspect the basic PPE as a part of PSAs.
- Use appropriate checklists for specialized PPE inspection.
- Be informed of all hazards and potential hazards on a project.
- Not to remove or make ineffective any protective device required by the regulations or by the employer.
- Care for, clean, and maintain all PPE.
- Inspect all PPE before use and report any missing or defective PPE immediately to supervisor.

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#### 5.4. Contractors/Service providers

- Follow site specific rules on PPE.
- Wear PPE (basic and specialized) as required.
- Inspect and maintain PPE as required.


#### 5.5. Visitors

- Follow site specific rules on PPE.

## 6 Related Documents/Forms

- BESTCO-PLY-06.0 – Personal Protective Equipment Policy
- BESTCO-PRO-06.1 – Head Protection Guidelines
- BESTCO-PRO-06.2 – Fall Protection Guidelines
- BESTCO-PRO-06.3 – Respiratory Protection Guidelines
- BESTCO-PRO-06.4 – Eye and Face Protection Guidelines
- BESTCO-PRO-06.5 – Foot Protection Guidelines
- BESTCO-PRO-06.6 – Hearing Protection Guidelines
- BESTCO-PRO-06.7 – Hand and Skin Protection Guidelines
- BESTCO-PRO-06.8 - Arc Flash Protection Guidelines
- BESTCO-PRO-01.2-Document and Record Control Procedure
- Daily Pre-job Safety Assessment (PSA)
- Job Hazard Analysis
- PPE Matrix
- Safe Work Practices/Safe Job Procedures
- Toolbox talk forms
- New Employee Orientation Form
- Site Orientation Form
- Training Records/Certificates
- Preventative Maintenance Schedule
- Fall Protection System Pre-use Inspection Checklist
- Arc-Flash PPE Pre-use inspection Checklist
- Respirator Pre-use Inspection Checklist
- Other Specialized PPE Pre-use Inspection Checklist

## 7 Document and Record Maintenance

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Documents and Records are maintained as per **BESTCO-PRO-01.2-Document and Record Control Procedure**.

## 8 Record Retention


Records are to be retained for a minimum of 3 years. Records will remain legible and readily identifiable.

## 9 Legislated/Other References

- Duties of employers – Occupational Health and Safety Act, s. 25, 26
- Duties of constructors – Occupational Health and Safety Act, s. 23
- Duties of supervisors – Occupational Health and Safety Act, s. 27
- Duties of workers– Occupational Health and Safety Act, s. 28
- O. Reg. 213/91: Construction Projects under Occupational Health and Safety Act
- O. Reg. 851: Industrial Establishments under Occupational Health and Safety Act
- Other applicable Regulations and standards.
- IHSA COR™ 2020 Guidelines
- CSA Standards for PPE
  - CSA Z195:14 (R2019) - Protective footwear
  - CSA Z195.1-16 Guideline on selection, care, and use of protective footwear
  - CSA-Z94.1-15 (R2020) - Industrial Protective Headwear - Performance, Selection, Care, and Use
  - CSA Z96-15 (R2020) - High-visibility safety apparel
  - CSA Z96.1-08 - Guideline on Selection, Use, and Care of High-Visibility Safety Apparel
  - CSA Z94.3:20 - Eye and face protectors
  - CSA Z94.3.1-16 Guideline for selection, use, and care of eye and face protectors
  - CSA Z94.2-14 (R2019) - Hearing protection devices - Performance, Selection, Care, and Use
  - CSA-Z94.4-18 - Selection, Use and Care of Respirators
  - CSA-Z259.1-05 (R2020): Body Belts and Saddles for Work Positioning and Travel Restraint.
  - CSA-Z259.2.5-17: Fall Arresters and Vertical Lifelines
  - CSA-Z259.2.2-17: Self-Retracting Devices for Personal Fall-Arrest Systems
  - CSA-Z259.2.3-16 (R2020): Descent Control Devices
  - CSA-Z259.10-18: Full Body Harnesses
  - CSA-Z259.11-07: Energy Absorbers and Lanyards


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- CSA-Z259.12-16 (R2021): Connecting Components for Personal Fall Arrest Systems (PFAS)
- CSA Z259.17:21- Selection and use of active fall-protection equipment and systems
- CSA Z462:21 - Workplace electrical safety (Arc Flash)
- Manufacturers Guidelines

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# Head Protection Guidelines

<b>Version No.</b>	<b>Reason for Revision:</b>	<b>Developed By and Date:</b>	<b>Reviewed By and Date:</b>	<b>Approved By and Date:</b>
1	To meet COR 2020 Standards, company's health and safety processes and Ontario's Health and Safety Legislative Requirements.	Emma Lisson, Health and Safety Coordinator 11 July, 2025	Michael Zaborsky and Ovidiu Cotiga, Senior Management 18 August, 2025	Michael Zaborsky, President 02 September, 2025

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## 1 Purpose

The purpose of this procedure is to ensure that all workplace parties receive appropriate information of Personal Protective Equipment (PPE) to protect their health and safety while performing their assigned duties. PPE is required to protect workers against hazards when other controls are not feasible, or to supplement other controls.

## 2 Scope

This program applies to all workplace parties who may be exposed to overhead injuries such as dropped material, equipment tools or working under heavy mobile equipment during the course of work at Bestco Construction Ltd.

## 3 Procedure:

Safety headwear is designed to protect the head from the impact of falling objects, bumps, and contact with energized objects and equipment. It must be able to withstand an electrical contact equal to 20,000 volts phase-to-ground.

Hard hat is mandatory to be worn at all times for every worker on a construction project in Ontario. Prior to hazard assessment, Type 2, Class E headwear shall be selected as it provides the highest level of dielectric, crown, and lateral protection for users.

### 3.1. Head Protection Specifications

#### (a) Type of Head Protection


There are two types of CSA Group-approved hardhats:

- Type 1: offers impact and penetration protection to the crown only.
- Type 2: provides crown and lateral (side) impact and penetration protection.

#### (b) Selection

Hard hats that comply with the CSA and ANSI standards must contain other information marked inside the hard hat such as:

- Manufacturer's identity
- Model
- Class and type (E.g., Class E, Type 2)
- Reverse orientation mark if applicable
- Year and month of manufacture
- Size or size range

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- The following wording,

This protective headwear is designed to absorb some of the energy of a blow through destruction of its component parts and, even though damage may not be apparent, any partial protective headwear subjected to severe impact should be replaced. This protective headwear must not be painted or cleaned with solvents. Any decals applied to the protective headwear must be compatible with the surface material and known not to affect adversely the characteristics of the materials used in the protective headwear. Any addition or structural modification may reduce the protective properties afforded by this protective headwear.

#### (c) Classes and Make of Head Protection

There are many designs, but they all must meet CSA requirements for Class G, rated for 2,200 volts (General Usage), Class E, rated for 20,000 volts (Electrical trades and class C (Conductive), do not offer electrical protection). The CSA standard for head protection is CSA-Z94.1-15 (R2020) - Industrial Protective Headwear - Performance, Selection, Care, and Use, Class E, and Type 1 & 2. Type 2 provides extra protection against side impact.

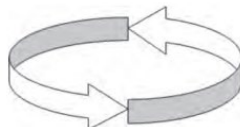
**Class E** hard hats come in three basic styles:

- Standard design with a front brim, rain gutter, and attachment points for accessories such as hearing protection
- Standard design with a front brim and attachment points for accessories, but without a rain gutter
- Full-brim design with attachment points for accessories and a brim that extends completely around the hat for greater protection from the sun.

#### Reversible Hard Hats

A hard hat should only be worn in reverse only if:

- The hard hat has a reverse orientation mark




- The job, task, or work environment necessitates wearing it backward (e.g., when wearing a face shield or welding helmet).

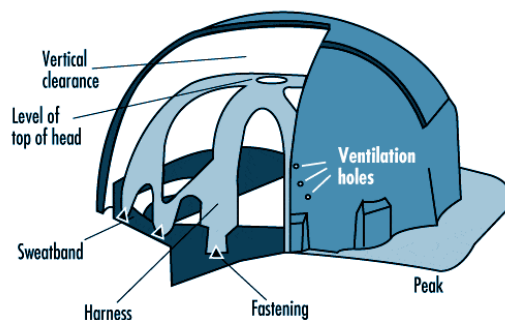
Most head protection is made up of two parts:

- The shell (light and rigid to deflect blows)



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- The suspension (to absorb and distribute the energy of the blow)  
Both parts of the headwear 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. Bump caps or laceration hats are not considered safety helmets.



## 4 Purchasing Criteria


Head protection shall be purchased based on the hazards that are present.

Assess the workplace and work activities for the following:

- Type of overhead hazards falling onto or striking the head.
- Possible explosive atmospheres including risk of electrical discharge.
- Environmental conditions the workers may be exposed to.
- Correct for the job. Refer to Canadian Standards Association (CSA) Standard “CSA-Z94.1-15 (R2020) - Industrial Protective Headwear - Performance, Selection, Care, and Use” or agency responsible for occupational health and safety legislation within the jurisdiction will be contacted for more information.
- Review of Job Hazard Analysis (JHA) library, SWP/SJPs and SDSs where applicable.

### 4.1. Protection

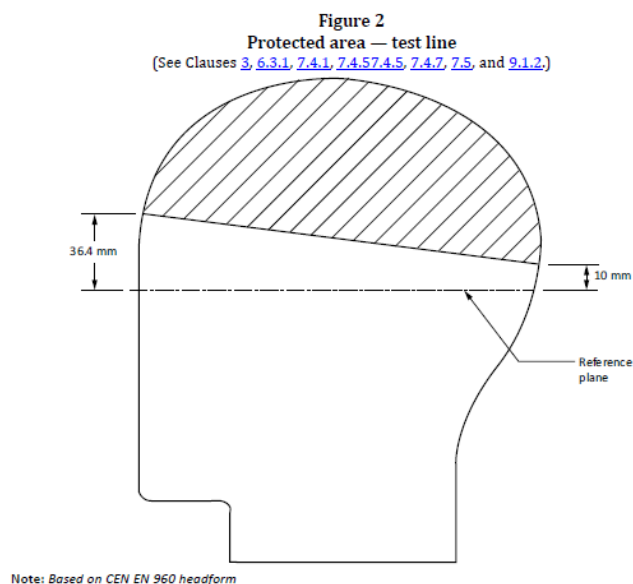
Bestco Construction Ltd. requires the hardhat as a mandatory basic PPE. Anyone visiting or working on Bestco Construction Ltd. site and property are required to wear a CSA-approved hardhat. Any additional requirements for hardhats will be contingent on the hazard assessment for the task performed by a competent person. Relevant SDSs, legislated requirements and CSA standards will be taken into consideration when performing hazard assessment. Refer to **BESTCO-PRO-06.0 – Personal Protective Equipment Procedure** to distinguish between “Basic” and “Specialized” PPE.

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## 5 Fit, Use and Care


### 5.1. Fit

Ensure the protected area should be at minimum above the test line and is positioned in accordance with manufacturer's marking instruction. The area the head protection covers will correspond to the head form size.



### 5.2. Use

- Do not carry anything inside of headwear as it will affect the liner's ability to absorb energy on impact.
- Any accessories used should be compatible with headwear and no interfere with its fit, form and function.
- Bandanas, Handkerchiefs, Bouffants or welder's caps: Ensure fabric does not include any metal pieces to obscure the stability and fit of the helmet on the user.
- Decals, Laminates, Stickers, or tape: Decals or laminates applied on headwear should be compatible with surface material and not known to adversely affect characteristics of materials. Non-metallic sticks or reflective tape should be placed at least 13mm (1/2 in) above the edge of the brim. Stickers should not affect the ability for the user to inspect for damage.

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- Winter Liners: Similar to bandanas, liners should not affect proper fit, form, function or protective capabilities of headwear.
- Painting on Headwear: No paint on helmets unless permitted by manufacturer.
- Insect Repellent: Consult headwear manufacturer if insect repellent or other chemicals allow of direct spray or insertion into the headwear.


### 5.3. Care

- Proper care is required for headgear to perform efficiently. Its service life is affected by many factors, including temperature, chemicals, sunlight, and ultraviolet radiation (welding).
- Always consult the manufacturer's instructions for use and care instructions of your hard hat. You may also need to know which components of the hard hat must be inspected before each use.
- Do not alter or modify the shell to reduce the provided protection by the headwear by drilling holes, painting the shell and use winter liners that contain metal or electrically conductive material, use metal labels or place chin straps over the brims of certain class of headwear.
- The suspension and shell can be cleaned regularly with mild soap and warm water and/or according to the manufacturers' instructions.

## 6 Inspection

When using head protection, consider the following:

- Inspections shall be conducted during the daily Pre-Job Safety Assessment.
- Inspect the shell, suspension, and liner every day before you use it. Look for cracks, dents, cuts, or gouges.
- Suspension should be inspected carefully for any twisted, cut, or frayed straps. Look for cracks or tears in the plastic clips.
- Liner should be checked regularly for signs of damage. Liner which are cracked or show other signs of damage should be replaced.
- Don't store your hard hat in direct sunlight—it will age quicker and can become brittle.
- Clean the shell, suspension, and liner regularly with mild soap and water.
- Never alter your hard hat by painting it, making holes in it, etc.
- Don't carry things inside your hard hat.
- Don't wear a baseball cap under your hard hat.
- Check the service life of your hard hat by reading the manufacturer's instructions.

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- Headwear which has been struck by an object must be replaced even if there is no sign of damage.


## 7 Maintenance

- Accurate records of the handling, storage, use and disposal of head protection devices shall be maintained.
  - The maintenance tracker will have information pertaining to:
    - The date code of the device
    - The maintenance frequency.
    - Any modifications, repairs, maintenance, and disposals performed.
    - The date maintenance was conducted.
- Maintain and make such records available to the affected workers, if needed.
- A hard hat's service life starts when it is placed in service.
- The "date code" stamped on the inside of your hard hat refers to the date of manufacture, not the starting date for useful service.
- These might indicate a hard hat need replacing, including:
  - Beyond expiration date
  - Dents
  - Scratches
  - Cracks
  - Painted
  - Use of solvents
  - Warped
  - Scorched
  - Taped together
  - Exposed to excessive heat
  - Excessive cold exposure

## 8 Responsibilities:

### 8.1. Management

- Ensure head protection PPE as prescribed are provided to all workers.
- Ensure head protection PPE provided are maintained in good condition.
- Ensure written guidelines for fitting, care and use of the PPE is readily available and workers are made of it.
- Ensure head protection devices prior to first use by employees are inspected and maintained.

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- Ensure the Preventative Maintenance Schedule is updated accordingly.  
Ensure the PPE is inspected as part of PSA.
- Ensure supplies are replenished as required.
- Ensure that head protection provided are used as prescribed by; management, supervisors, workers, sub-contractors, suppliers and other workplace parties, as required.

## 8.2. Supervisor

- Ensure that workers work in the manner and with the protective devices, measures and procedures required by the occupational health and safety act and the regulation.
- Ensure head protection PPE is worn by all workers that the employer requires be used.
- Ensure head protection PPE provided are maintained in good condition.
- Ensure written guidelines for fitting, care and use of the PPE is readily available and workers are made aware of it.
- Ensure head protection devices prior to first use by employees are inspected and maintained.
- Ensure the Preventative Maintenance Schedule is updated accordingly.
- Ensure the PPE is inspected as part of PSA.
- Review head protection compliance and requirements in safety meetings with all workers.
- Advise a worker of the existence of any potential or actual danger to the health and safety of the worker of which the supervisor is aware.
- Take every precaution reasonable in the circumstances for the protection of a worker.
- Ensure that head protection provided are used as prescribed by, management, supervisors, workers, sub-contractors, suppliers, and other workplace parties, as required.

## 8.3. Worker

- Every worker shall wear protective headwear at all times when on a project and other workplace as required.
- Report to his or her employer or supervisor the absence of or defect in any head protection device of which the worker is aware and which may endanger himself, herself, or another worker.
- Participate in in PPE inspection as part of PSA.

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- Review Head Protection Guidelines and be familiar with fitting, care, and use of the PPE.
- Be informed of all hazards and potential hazards on a project.
- Shall not remove or make ineffective any protective device required by the regulations or by the employer.
- Ensure head protection is stored, cleaned, and maintained properly.

#### **8.4. Other Workplace Parties (Suppliers, Sub-contractors)**

- Ensure that the head protection devices are in good condition.
- Ensure head protection is worn at all project sites and other workplaces as required.

## **9 Related Documents/Forms**

- BESTCO-PLY-06.0 – Personal Protective Equipment Policy
- BESTCO-PRO-06.0 – Personal Protective Equipment Procedure
- Daily Pre-job Safety Assessment (PSA)
- Job Hazard Analysis
- PPE Matrix
- Preventative Maintenance Schedule
- Safe Work Practices/Safe Job Procedures
- New Employee Orientation Form
- Site Orientation Form
- Training Records/Certificates

## **10 Document and Record Maintenance**


Documents and Records are maintained as per **BESTCO-PRO-01.2-Documents and Record Control Procedure**.

## **11 Record Retention**


Records are to be retained for a minimum of 3 years. Records will remain legible and readily identifiable.

## **12 Legislated/ Other References:**

- Duties of employers – Occupational Health and Safety Act, s. 25, 26

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- Duties of constructors – Occupational Health and Safety Act, s. 23
- Duties of supervisors – Occupational Health and Safety Act, s. 27
- Duties of workers– Occupational Health and Safety Act, s. 28
- O. Reg. 213/91: Construction Projects under Occupational Health and Safety Act
- O. Reg. 851: Industrial Establishments under Occupational Health and Safety Act
- CSA-Z94.1-15 (R2020) - Industrial Protective Headwear - Performance, Selection, Care, and Use
- Manufacturers Guidelines

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# Personal Fall Protection Guidelines


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1	To meet COR 2020 Standards, company's health and safety processes and Ontario's Health and Safety Legislative Requirements.	Emma Lisson, Health and Safety Coordinator 11 July, 2025	Michael Zaborsky and Ovidiu Cotiga, Senior Management 18 August, 2025	Michael Zaborsky, President 02 September, 2025



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## 1 Purpose

The purpose of this guideline is to ensure that all employees receive appropriate information of Personal Fall Protection Equipment (PPE) to protect their health and safety while performing their assigned duties.

## 2 Scope

This program applies to any worker who may be exposed within 2.4 metres a fall hazard and a guardrail cannot be used during the course of work at Bestco Construction Ltd.

## 3 Definitions

**Fall Prevention Systems:** Devices or controls that eliminate or minimize the possibility of a fall by a worker while they are performing various activities.

**Travel Restraint System:** An assembly of components capable of restricting a worker's movement on a work surface and preventing the worker from reaching a location from which he or she could fall.


**Fall Restricting System:** A type of fall arrest system that has been designed to limit a worker's fall to a specified distance.

**Fall Arrest System:** An assembly of components joined together so that when the assembly is connected to a fixed support, it is capable of arresting a worker's fall.

**Safety Net:** A safety net should comply with section 26.8 of the Construction Projects Regulation and is located and supported in such a way that it arrests the fall of a worker who may fall into it without endangering the worker.

**Fixed Support:** A permanent or temporary structure or a component of such a structure that can withstand all loads and forces the structure or component is intended to support or resist and is sufficient to protect a worker's health and safety and includes equipment or devices that are securely fastened to the structure or component.

**Full-body Harness:** A device that can arrest an accidental vertical or near vertical fall of a worker and which can guide and distribute the impact forces of the fall by means of leg and shoulder strap supports and an upper dorsal suspension assembly which, after the arrest, will not by itself permit the release or further lowering of the worker.

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## 4 Procedure

### 4.1. Selection of Fall Protection Equipment:

Bestco Construction Ltd. considers fall protection equipment as specialized PPE and equipment should be worn when workers have a potential to fall about 2.4 metres. Determination of type and necessity for PPE will be contingent on the hazard assessment of task performed by a competent person. Relevant SDSs, legislated requirements and CSA standards will be taken into consideration when performing hazard assessment. Refer to **BESTCO-PRO-06.0 – Personal Protective Equipment Procedure** to distinguish between “**Basic**” and “**Specialized**” PPE.

Selection of fall protection will be based on guidelines from CSA Z259.17.1:21 “Guideline for selection and use of active fall-protection equipment and systems”.

### 4.2. Purchasing Criteria:

#### Harnesses

All jurisdictions in Canada require that workers wear adequate protection against workplace hazards. For workers exposed to fall hazards, full body harnesses purchased will meet the requirements for Class A Fall arrest system certified by the CSA Group (CSA Z259.10-18).

Harnesses will be selected from the 5 following classes:


#### (a) Class A Fall Arrest

Class A harnesses are designed to protect workers when they are six feet or more above the ground. They support the body during and after a fall. Dorsal (back) D-rings located between the shoulder blades on the workers back are used for fall protection. They slide on impact, keeping the worker in an upright position during a fall.

#### (b) Class AD Suspension and Controlled Descent

Class AD harnesses are used to support and hold a worker while being raised and lowered. There is one sternal (front) D-ring and one dorsal (back) D-ring. The sternal D-ring is used for attachment to a descent device.

#### (c) Class AE Limited Access

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Class AE harnesses are designed to raise or lower a worker through a confined area. Shoulder D-rings serve as anchorage points for attaching an extraction yoke or other rescue device. The D-rings slide on the shoulder strap for optimal positioning of the worker.

(d) Class AL Ladder Climbing

Class AL harnesses are designed for use with a certified fall arrester that travels on a vertical lifeline or a rail. Sternal (front) D-rings are used for attachment to the vertical system.

(e) Class AP Work Positioning

Class AP harnesses will hold and sustain a worker at a specific location, allowing full use of the hands, while limiting any free fall to two feet or less. Slide D-rings at waist level are used for positioning and restraint.

### 4.3. Personal Fall Protection Equipment

A Fall Protection must be used where a worker may be exposed to any of the following hazards (O. Reg. 213/91, s. 26):


1. Falling more than 3 metres (10 feet)
2. Falling more than 1.2 m (4 ft) if the work area is used as a path for a wheelbarrow or similar equipment
3. Falling into operating machinery
4. Falling into water or another liquid
5. Falling into or onto a hazardous substance or object
6. Falling through an opening on a work surface.

An assembly of components including a fully body harness or safety belt (CSA approved), lanyard, lifeline, rope grab and adequate anchorage which must be worn in the event where work must be completed within 2.4 metres of an unprotected surface edge.

### 4.4. Types of Fall Protection

(a) Travel Restraint System:

A system which allows the worker to conduct work close to the surface edge of the building while preventing a fall hazard. It is a fall prevention method and cannot be used as a fall-arrest. The worker wears a full body harness attached to an adequate anchorage point of a building's permanent fixture.

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- Full body Harness or safety belt (CSA approved)
- Lanyard
- Lifeline
- Rope grab to attach harness or lanyard to lifeline

Adequate anchorage for a travel restraint system means that it is capable of supporting a static load of 2 kilonewtons (kN) (450 lb) with a recommended safety factor of at least 2 (i.e., 4 kN or 900 lb).

(b) Fall Restricting System

A fall arrest system designed to limit the free fall distance to no more than 0.6 metres (1'11 ft.). A fall restricting system limits a worker's fall to a specified distance. Fall restricting system is mainly used with ladder applications in confined spaces, telecommunications, crane installations, utilities, etc.

(c) Fall Arrest System


A fall-arrest is a personal fall protection system made from essential connected parts to stop a workers fall when adjoined to a fixed support. This is a means of protection after the fall or controlling the severity of the fall's force. The system cannot prevent a fall from occurring. It must be maintained, supervised, and in good condition. The fall arrest system must not cause the worker to hit the object, ground, or bring them to the level beneath.

#### 4.5. Fall Protection Components

(a) Anchorage

A fall protection system must be attached to appropriate anchorage. There are three basic types of anchor systems used for fall protection:

- **Designed fixed supports:** These are load-rated anchors specifically designed and permanently installed for fall protection purposes as an integral part of the building or structure. An example is roof anchors on high-rise buildings.
- **Temporary fixed supports:** These are anchor systems designed to be connected to the structure using specific installation instructions. An example is nail-on anchors used by shingles.
- **Existing structural features or equipment:** These are not intended as anchor points but are verified by a professional engineer or competent person as having adequate capacity to serve as anchor points.

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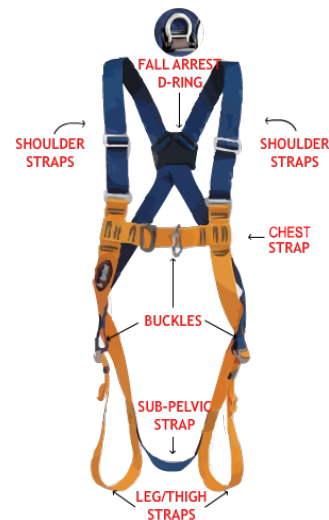
Examples are rooftop mechanical rooms, structural steel, or reinforced concrete columns.


(b) Full Body Harness


Used to stop a worker from an accidental fall in an upright position by equally distributing the weight through the shoulder straps of the leg and shoulder. The assembly of the harness provides suspension support to the upper body. In the event of a fall, the harness provides enough support that it does not further let go or drop the worker.

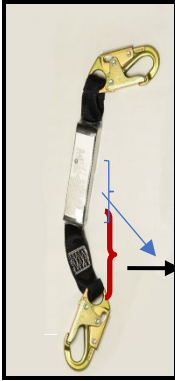



(i) Components of a Full Body Harness

- Shoulder straps
- Chest straps
- Sub-pelvic strap
- Fall arrest D-Ring
- Buckles
- Leg/ thigh straps




Component	Description
<b>Carabiner (D-clip)</b> 	The carabiner is a personal fall protection device made to remain completely closed while linking components. Opening the keeper requires two steps: twisting and pulling the locking mechanism back. The shape of the carabiner is an oblong ring and self-locks on the components it adjoins when pushed back. The spring mechanism loaded inside the gate helps it lock.

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 <p>→ <b>Lanyard</b></p> <p>→ <b>Shock Absorber (Energy Absorber)</b></p>	<p>A lanyard connects a full body harness or safety belt to a rope grab that connects with a lifeline or anchor. It is a flexible and sturdy rope line made of wire, synthetic, or webbing. The lanyard must be CSA Standard approved and come from manufactured sources only.</p> <p>The lanyard associated with a shock absorber shall be used in a fall arrest system. During a fall, a shock absorber reduces the impact applied to the worker. A shock absorber can come either previously attached to the lanyard or separately when bought in standard size or for heavier use. A lanyard with a built-in shock absorber must have a constant diameter or range.</p>
<p><b>Lifeline</b></p> 	<p>A piece of steel wire rope or synthetic fibre that assists as a component of fall arrest. The lifeline connects the fall arrest or travel restraint system to an adequate anchorage point.</p>
<p><b>Rope Grab</b></p> 	<p>A rope grab links the lanyard to the lifeline. A rope grab, given a firm force can go along the lifeline. It will lock in the presence of a quick pull and stay that way unless released. Snap hooks that do not lock must not be used.</p>
<p><b>Snap Hook</b></p> 	<p>The lanyard connects to the full body harness and lifeline with a snap hook. The bottom keeper of the snap hook has a spring mechanism that needs to be lowered inside the hook in order to create an opening to connect, otherwise it remains locked. To prevent unplanned rollouts of adjoining ends, snap hooks must be enforced. Snap hooks that do not lock must not be used.</p>



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- (c) Other components
- (d) Not Recommended

- (i) Grab Hook

A grab hook connects components needed to make a personal protection system. However, grab hooks do not close completely on the equipment it connects. This is not recommended equipment and although available, must not be used according to CSA requirements.



- (ii) Safety Belt

A safety belt is worn around the waist. The belt must function as per its intended use. It must not be used as a fall arrest method.



- (e) Shock Absorber

- The force required to deploy a shock absorber must be at a minimum 6 kilonewtons (1349 pounds). The force of the shock absorber shall not be greater than the used material's allowable unit stress. This is applicable if the shock absorber, a component of the lanyard is used in the fall arrest system.
- A fall arrest system must be capable of supporting a minimum 8 kilonewtons in static force without going over the allowable unit stress for each material used.
- With a shock absorber, a fall arrest system must be capable of supporting a minimum static force of 6 kilonewtons without exceeding the allowable unit stress for each material used


#### 4.6. Horizontal and Vertical Lifelines

There are requirements to protect horizontal and vertical lifelines while in use. Both require the design of a professional engineer and must follow CSA standard. All types of lifelines must be free from splices or knots unless the knots are used for fixed supports. A complete design copy of the lifeline used must be available on site.

- (a) Vertical Lifeline

- 16mm synthetic rope (Typical use)



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- One person to use at a time
- Reach the surface or level above
- Positive stop to prevent run offs from the lifeline's end (ex. Rope grab)

(b) Horizontal Lifeline (Standard Design/ Site Specific)

- Design must indicate arrangements, components, anchorage points, and all loads used
- All required components must be listed
- Indicate the number of workers allowed to use one lifeline at a time
- Clear instructions are given for inspection, installation, and maintenance

(c) Self-retractable lifelines


- Designed to be anchored above the worker (i.e., vertically). If it is being used horizontally, check with the manufacturer to ensure that it is designed for that type of use.
- Automatically retract when tension is removed, thereby preventing slack in the line.
- Lock up when a quick movement, such as the movement caused by a fall, is applied.
- Designed to minimize fall distance and the forces exerted on a worker's body by fall arrest.

(d) Lifeline Protection

- Free of splices or knots
- Free from areas exposed to chemicals, gasoline, or objects
- Discoloration, frailty, brittle
- Sun exposure, extreme heat, friction from normal movement
- Damages with rough, abrasive surfaces
- Work requiring flame or welding

## 5 Set-up, Fit, Use and Care

Bestco Construction Ltd. will provide workers with appropriate Fall arrest or travel restraint equipment. There are steps required to properly set-up, use, maintain, and store travel restraint and fall arrest equipment. These steps allow the worker to safely use the components required for personal fall protection. The following guidelines shall be

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maintained on an everyday basis and reviewed by a competent person on an ongoing basis.

### 5.1. Fit

Proper fit of the harness is important – refer to the manufacturer’s instructions for proper use and fit. General recommendations for proper fit include:

- Adjust near the strap so that it is snug and located near the middle of your chest;
- Adjust the leg straps so that your first can fit snugly between the strap and your leg; and
- Adjust the shoulder straps so that the back of the D-ring rests between your shoulder blades.

#### (a) Harness

- Chest-strap must be comfortable and at the middle of the worker’s chest
- Leg strap (worker’s fist can comfortably go between the strap and leg)
- Adjust harness straps to put d-ring between the shoulder blades

#### (b) Carabiners


- Made not to disconnect under twist loads

#### (c) Rope Grab

- Manufactured to a specific diameter
- Manufactured to a particular lifeline (compatibility)
- Correctly attached to the lifeline so that it is not inverted
- Indicated arrow denotes the direction of attachment to lifeline
- Each rope grab is designed for use with a specific length of lanyard (normally 2 or 3 ft maximum)

#### (d) Snap Hook/ Grab Hook

- Must close completely (Snap hook)
- Do not attach one snap hook to another
- Must be connected to a compatible hardware
- Ensure snap hook spring has enough tension power to close the keeper

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(e) Lanyard

- Manufactured and to specific lengths
- Lanyard must not be made smaller by making knots
- Knots can reduce the effectiveness of a lanyard
- Do not store near chemicals, wet places, or sharp objects
- Prevent exposure to sunlight
- One d-ring cannot link two lanyards
- Use Y lanyards if two must be used

(f) Lifelines

- The lifeline's set-up with the shock absorber in the overall system requires the manufacturer's instructions (ex. horizontal position)
- Vertical lifeline to be used by one person only
- Free of splices or knots (unless knots used for fixed supports)
- Always store separately and do not store with chemicals, gasoline, or objects


## 5.2. Use

### How to "Don" and "Doff" Personal Fall Arrest Equipment

The following steps are required to put on and take off personal fall arrest equipment allow for easy use, storage, and maintenance. It allows other workers to use the same equipment when it is maintained and stored well.

(a) "Don" Steps

1. Hold the harness by the back of the D-Ring and then shake, allowing all the straps to fall into place
2. Unbuckle the waist strap and release the leg, chest, and shoulder straps if not already done so
3. Put the straps over the shoulders, so the D-ring is in the back's middle between the shoulder blades
4. Fasten both legs straps, then the waist strap
5. Fasten chest strap by making sure the shoulder straps are firm and positioned to the center of your chest
6. Fasten all the buckles ensuring the harness is tight but comfortable
7. Use the snap hook to connect the D-Ring of the harness to the lanyard

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(b) “Doff” Steps

1. Unfasten all the buckles
2. Loosen all the straps of the harness including the leg straps, chest straps, and waist straps
3. Extending all the straps out so that it is easier for the next person to put on
4. Take off the harness and lay on clean surface
5. Fold each leg strap into the waist band then the shoulder straps

### 5.3. Care

Refer to the manufacturer’s instructions for the proper cleaning and storage methods.

## 6 Inspection and Maintenance

Inspections shall be conducted using the **Pre-Use Inspection checklist** and should document the above connecting components. Consider looking for the following:

- a. Damage, cracking, dents, bends or signs of deformation;
- b. Connecting rings that are bent to one side or otherwise deformed;
- c. Rust or sharp edges;
- d. Moving parts that don’t work smoothly; and
- e. signs of wear or metal fatigue.


Accurate records of the handling, storage, use and disposal of fall protection equipment shall be maintained.

- The maintenance tracker will have information pertaining to:
  - The maintenance frequency.
  - Any Modifications, repairs, maintenance, and disposals performed.
  - The date maintenance was conducted.
  - Maintain and make such records available to the affected workers, if needed.

## 7 Responsibilities

### 7.1. Management

- Ensure proper fall PPE as prescribed are provided to all workers.
- Ensure fall PPE provided are maintained in good condition.
- Ensure the Preventative Maintenance Schedule is updated accordingly.

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- Ensure fall protection equipment and devices prior to first use by workers are inspected and maintained.
- Ensure the PPE is inspected as part of PSA.
- Ensure written fall protection policy and procedures relevant to the workplace are easily accessible for review when required.
- Consider and provide the use of passive fall arrest systems such as guardrails, travel restraints or fall-restricting systems.  
Ensure that fall PPE provided are used as prescribed by; management, supervisors, workers, sub-contractors, suppliers, and other workplace parties, as required.

## 7.2. Supervisor

- Ensure that workers work in the appropriate manner and with the appropriate fall protection equipment, measures and procedures required by the occupational health and safety act and regulations.
- Ensure fall PPE are used properly by all workers on site.
- Ensure fall PPE provided are maintained in good condition.
- Ensure written guidelines for fitting, care, and use of all the PPE is readily available and workers are made aware of it.
- Ensure the Preventative Maintenance Schedule is updated accordingly.
- Ensure the PPE is inspected as part of PSA.
- Review Fall Protection compliance and requirements in safety meetings with all workers.
- Ensure fit tests have been completed by workers.
- Advise a worker of the existence of any potential or actual danger to the health and safety of the worker of which the supervisor is aware.
- Take every precaution reasonable in the circumstances for the protection of a worker.
- Ensure that fall protection provided are used as prescribed by, management, supervisors, workers, sub-contractors, suppliers, and other workplace parties, as required.

## 7.3. Worker

- Every worker shall wear fall PPE at all times when on a project and other workplace as required.
- Report to his or her employer or supervisor the absence of or defect in any fall PPE of which the worker is aware and which may endanger himself, herself, or another worker.

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- Participate in PPE inspection as part of PSA
- Review Fall Protection Guidelines and be familiar with fitting, care, and use of the PPE.
- Ensure all fall protection devices provided are stored, cleaned, and maintained in good condition.
- Be informed of all hazards and potential hazards on a project.
- Shall not to remove or make ineffective any protective device required by the regulations or by the employer.
- Adhere to all applicable fall protection legislation and company policy and procedures.
- Actively participate in fall protection education and training.
- Understand their right to refuse unsafe work.

#### **7.4. Other Workplace Parties (Contractors/Service Providers)**

- Ensure that all fall protection equipment is in good condition.
- Ensure fall protection is worn at all project sites and other workplaces as required.


## **8 Related Documents/Forms**

- BESTCO-PLY-06.0 – Personal Protective Equipment Policy
- BESTCO-PRO-06.0 – Personal Protective Equipment Procedure
- Daily Pre-job Safety Assessment (PSA)
- Job Hazard Analysis
- PPE Matrix
- Safe Work Practices/Safe Job Procedures
- New Employee Orientation Form
- Site Orientation Form
- Training Records/Certificates
- PPE Maintenance Schedule
- Fall Protection System Pre-use Inspection Checklist

## **9 Document and Record Maintenance**

Documents and Records are maintained as per **BESTCO-PRO-01.2-Document and Record Control Procedure**.


## **10 Record Retention**

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Records are to be retained for a minimum of 3 years. Records will remain legible and readily identifiable.

## 11 Legislated/ Other References


- Construction Projects Regulation 213/91, s.26
- CSA Standards for PPE
  - CSA-Z259.1-05 (R2020): Body Belts and Saddles for Work Positioning and Travel Restraint.
  - CSA-Z259.2.5-17: Fall Arresters and Vertical Lifelines
  - CSA-Z259.2.2-17: Self-Retracting Devices for Personal Fall-Arrest Systems
  - CSA-Z259.2.3-16 (R2020): Descent Control Devices
  - CSA-Z259.10-18: Full Body Harnesses
  - CSA-Z259.11-07: Energy Absorbers and Lanyards
  - CSA-Z259.12-16 (R2021): Connecting Components for Personal Fall Arrest Systems (PFAS)
  - CSA Z259.17:21- Selection and use of active fall-protection equipment and systems
- Manufacturer Guidelines

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# Respiratory Protection Guidelines


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1	To meet COR 2020 Standards, company's health and safety processes and Ontario's Health and Safety Legislative Requirements.	Emma Lisson, Health and Safety Coordinator 11 July, 2025	Michael Zaborsky and Ovidiu Cotiga, Senior Management 18 August, 2025	Michael Zaborsky, President 02 September, 2025



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## 1 Purpose

The purpose of this procedure is to ensure that all employees receive appropriate information of Personal Protective Equipment (PPE) to protect their health and safety while performing their assigned duties. PPE is required to protect workers against hazards when other controls are not feasible, or to supplement other controls.

## 2 Scope

This program applies to any worker who may be exposed to respiratory hazards during the course of work at Bestco Construction Ltd.

## 3 Definitions

**Accepted Respirator:** a respirator tested and certified by procedures established by the National Institute for Occupational Safety and Health (NIOSH).

**Air-purifying Respirator:** a respirator with an air-purifying filter, cartridge, or canister that removes specific contaminants by passing ambient air through the air-purifying element.

**Atmosphere-supplying Respirator:** a respirator that supplies the respirator user with breathing air/gas from a source independent of the ambient atmosphere.


**Fit Test:** the use of qualitative or quantitative method to evaluate the fit of a specific make, model, and size of a respirator on an individual.

**Hazardous Atmosphere:** any atmosphere that is oxygen-deficient, exceeds occupational exposure limits, presents a fire/explosion hazard, and/or contains an airborne toxic or disease producing contaminant in concentrations deemed to be hazardous.

**Immediately Dangerous to Life and Health Atmosphere (IDLH):** an atmosphere that poses an immediate threat to life, would cause adverse health effects, or would impair an individual's ability to escape.

**Quantitative Fit Test:** a test method that uses an instrument to assess the amount of leakage into the respirator in order to assess the adequacy of respirator fit.

**Qualitative Fit Test:** a pass/fail test method that relies on the subject's sensory response to detect a challenge agent in order to assess the adequacy of respirator fit.

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**Respirator:** a device to protect the user from inhaling a hazardous atmosphere.

**Service Life:** the period of time during which a respirator provides adequate protection to the user.

**User Seal Check:** an action conducted by the respirator user to determine if the respirator is properly sealed to the face.

**Tight-fitting Facepiece:** a respirator inlet covering that forms a complete seal with the face. This includes a half-facepiece that covers the user's nose and mouth under the chin; and a full facepiece that covers the user's nose, eyes, and mouth under the chin.

## 4 Procedure

### 4.1. Types of Respirators

Two main types:

- (a) Air-purifying respirators (APRs)








Air-purifying respirators can remove contaminants in the air that you breathe by filtering out particulates (e.g., dusts, metal fumes, mists, etc.).

- (b) Supplied-air respirators (SARs).



Supplied-air respirators also known as atmosphere supplying respirators (APR), provide clean air from an uncontaminated source. Other APRs purify air by adsorbing gases or vapours on a sorbent (adsorbing material) in a cartridge or canister. They are tight-fitting and are available in several forms.


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Mask Type	Description
<b>Mouth Bit Respirator</b> 	Fits in the mouth and comes with a nose clip to hold nostrils closed - for escape purposes only.
<b>Quarter-Mask</b> 	Covers the nose and mouth.
<b>Half-Face Mask</b> 	This style is widely used as an air-purifying respirator. There are one or more filters or cartridges attached to the facepiece. This style covers the face from the nose and cups under the chin, usually held in place by two straps.
<b>Full Facepiece</b> 	This style covers the entire face and consists of a plastic frame with a clear visor. This provides more protection than other mask types.
Refer to the Safety Data Sheet(s) (SDS) or sheets if more than one product is being used. The SDS will identify any respiratory protection required and should specify the type of respirator to be worn.	

## 5 Purchasing Criteria

Respirators shall be purchased based on the following criteria:

1. Correct for the job. Refer to Canadian Standards Association (CSA) Standard Z94.4-18 "Selection, use, and care of respirators" or agency responsible for

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occupational health and safety legislation within the jurisdiction will be contacted for more information.

- Health of the worker and ability to wear a respirator
  - Review of the hazard assessment, SWP/SJPs and SDSs for chemical exposure
  - Existing legislation and standards
  - Work requirements and conditions
  - Duration of exposure
  - Characteristics and limitations of respirators
  - Respirator assigned protection factors
2. Workers shall be issued only those respirators for which they have been fit tested and medically approved.
  3. Where an IDLH atmosphere is identified, only pressure-demand self-contained breathing apparatus (SCBA) or a combination pressure-demand supplied air respirator with auxiliary self-contained air supply, with a minimum rated service time of 15 minutes shall be used.
  4. Respirators approved for escape only shall not be used for non-emergency applications.
  5. Atmosphere-supplying respirators that make use of compressed air for breathing shall meet the standards set out in Table 1 of CSA Standard Z180.1-19, Compressed Breathing Air and Systems (October, 2019).
  6. Atmosphere-supplying respirators that make use of ambient breathing air system shall have the air intake located in accordance with Appendix B of CSA Standard Z180.1-19, Compressed Breathing Air and Systems (October, 2019).


## 6 Selection of Respirator

Bestco Construction Ltd. considers face masks as specialized PPE that should be worn as needed. Determination of type and necessity for PPE will be contingent on the hazard assessment of task performed by a competent person. Relevant SDSs, legislated requirements and CSA standards will be taken into consideration when performing hazard assessment. Refer to **BESTCO-PRO-06.0 – Personal Protective Equipment Procedure** to distinguish between “Basic” and “Specialized” PPE.

Selection of respiratory protection will be based on guidelines from CAN/CSA-Z94.4-18 “Guideline for selection, use, and care of respirators”.

## 7 Set-up, Fit, Use, Care, and Maintenance

### 7.1. Respirator Fit Testing


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- Workers must pass an appropriate quantitative or qualitative fit test when using a respirator with a tight-fitting face piece.
- A fit test shall be carried out:
  - a. Prior to initial use of a tight-fitting respirator
  - b. Every 2 years
  - c. Whenever there is a change in respirator facepiece (make, model, or size)
  - d. Whenever the employee reports, or the supervisor makes visual observations of changes in the employee's physical condition that could affect respirator fit. Such conditions include, but not limited to:
    - Facial scarring
    - Dental changes
    - Cosmetic surgery
    - Obvious change in body weight
- Facial rash (dermatological condition)
- Fit test shall be performed only on workers who are clean-shaven where the facepiece seals to the skin.
- When a worker is required to wear other personal protective equipment, such as eye, face, head and hearing protection during his/her course of work, the same protective equipment shall be worn during the fit test to ensure that they are compatible with the respirator and do not break the facial seal.
- Fit testing records shall consist of the following:
  - a. Name and identification of the worker tested;
  - b. Type of test performed;
  - c. Make, model and size of the respirator fitted;
  - d. Date of the fit test;
  - e. Result of the fit test;
  - f. Name of the person conducting the fit test.
- When fitting a new respirator, try on several brands and sizes when possible.
- Different brands will fit slightly differently on your face.
- Move your head/face or make other movements to determine if the respirator is a good choice for you.
- The fit of your respirator should be evaluated periodically.

## 7.2. Use of Respirator

Prior to being assigned any task that requires the use of a respirator, the worker shall complete all the health screening, fit testing, and training requirements.

- Workers with facial hair that may interfere with the facepiece seal or valve function on tight-fitting respirators cannot use a tight-fitting respirator.


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- Other personal protective devices or equipment shall not interfere with the seal of the facepiece to the face of the worker.
- Side arms on eyeglasses or any other material such as hair, cloth, tissue, straps, and jewelry shall not pass between the face and the sealing surface of the facepiece or interfere with the seal of the tight-fitting facepiece to the face or with the operation of the respirator. Workers who must have corrective eyewear, where the eyewear interferes with the respirator seal, shall be provided with respirator spectacle kits by their department.
- The worker shall check the seal of the facepiece immediately after putting on the respirator.
- The worker should never break the respirator face-to-facepiece seal to communicate.
- Workers shall not remove their facepieces at any time while working in an IDLH atmosphere.
- Workers shall be permitted to leave the hazardous area for any respirator-related reason. The worker shall leave the hazardous area when:
  - The respirator fails to provide adequate protection;
  - The respirator malfunctions;
  - He/she detects air leakage around the face seal;
  - He/she detects an odour or tastes a chemical;
  - He/she has increased breathing resistance;
  - He/she experiences any illnesses or discomforts such as dizziness, nausea, weakness, breathing difficulties, sneezing, fever, chills, confusion, etc.;
  - He/she experiences extreme discomfort from wearing the respirator;
  - He/she needs to wash his/her face and facepiece to minimize skin irritation;
  - Components (including air tanks) or purifying devices need change-out.
- The respirator shall not be altered in any manner. All cartridges, replacement parts, etc., shall be from the same manufacturer as the respirator (e.g., use only NORTH cartridges and parts for a NORTH respirator).
- Where respirators are used for HAZMAT response, confined space entry etc.; the appropriate existing legislation, regulations, standards, and guidelines shall be consulted.

### **7.3. Care: Cleaning, Inspection, Maintenance and Storage of Respirators**


- Bestco Construction Ltd. shall provide each worker requiring a respirator with a respirator that is clean, sanitary and in good working order.



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- Each worker issued a respirator shall properly maintain his/her respirator to retain its original effectiveness. The maintenance shall include:
  - Cleaning and sanitizing
  - Shall be inspected with the aid of the **Pre-use Inspection Checklist**
  - Testing
  - Proper storage
- The respirator shall be cleaned and sanitized according to the respirator manufacturer's instructions.
- The frequency of cleaning shall depend on how many workers use the respirator and what it is used for.
  - Respirators issued to individual workers shall be cleaned and disinfected as often as necessary to maintain proper hygiene.
  - A single respirator issued to multiple workers must be cleaned and disinfected before each use.
  - Respirators designated for emergency use only must be cleaned and disinfected after each use.
- The worker shall inspect his/her respirator before and after each use.
- The SCBA cylinders shall be inspected by a qualified person according to the requirements of CSA Standards CAN/CSA-B339 and CAN/CSAB-340, the appropriate CGA publications C-6, C-6.1, and C-6.2 the Transport Canada Regulations under the Transportation of Dangerous Goods Act, and the manufacturer's instructions.
- The emergency SCBA shall be inspected on a schedule to ensure readiness for the anticipated emergency use.
- The records of all **Pre-use Inspection Forms** and service performed on an SCBA respirator and cylinder shall be maintained by the person responsible for the unit.
- The worker shall report defective or non-functioning respirators to his/her supervisor. These respirators shall be tagged and removed from service by the supervisor until repaired or replaced.
- Any respirator and cylinder repairs, and subsequent tests and checks shall be performed by the unit manufacturer or by a qualified external contractor. Defective or non-functioning half mask facepieces shall not be repaired but will be disposed and replaced instead.
- The worker shall store their respirators in a clean and sanitary location, in boxes or in plastic bags, marked with each worker's name. The respirators shall be stored in a manner that will protect them from dust, ozone, sunlight, heat, extreme cold, excessive moisture, vermin, damaging chemicals, oils,



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greases, or any other potential hazard that may have a detrimental effect on the respirator.

- When packed or stored, each respirator should be positioned to retain its natural configuration.
- Used cartridges/filters to be reused shall be stored in a manner to prevent contamination of the respirator facepiece.
- Repair and maintenance consist of those activities related to restoring a respirator to the manufacturer's original operating condition, including:
  - a. Operation of the respirator;
  - b. Care, cleaning, and inspection;
  - c. End-of-service recognition;
  - d. Change-out of filter elements;
  - e. Replacement of air cylinders;
  - f. Identification of problems;
  - g. Storage;
  - h. Removal from service; and
  - i. Familiarity with and adherence to the manufacturer's instructions.

This function requires that the individual maintain appropriate records. These activities can require a periodic proficiency review to the manufacturer's standards.

If there is any doubt about the correct type of protection for a specific material and operation, consult the manufacturer of the product, a supplier or manufacturer of respirators, or the CSAO.


## 8 Maintenance

Accurate records of the handling, storage, use and disposal of respiratory protection equipment shall be maintained.

- The maintenance tracker will have information pertaining to:
  - Shelf life or end of service life dates if applicable
  - The maintenance frequency.
  - Any modifications, repairs, maintenance, and disposals performed.
  - The date maintenance was conducted.
  - Maintain and make such records available to the affected workers, if needed.

## 9 Responsibilities

### 9.1. Management

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- Ensure appropriate respiratory PPE as prescribed are provided to all workers.
- Ensure respiratory PPE provided are maintained in good condition
- Ensure supplies are replenished as required.
- Ensure the Preventative Maintenance Schedule is updated accordingly.
- Ensure the PPE is inspected a spart of PSA
- Ensure that respiratory protection provided are used as prescribed by; management, supervisors, workers, sub-contractors, suppliers, and other workplace parties, as required.

## 9.2. Supervisor

- Ensure that workers work in the manner and with the appropriate respiratory equipment, measures and procedures required by the occupational health and safety act and regulations.
- Ensure respiratory PPE are used properly by all workers on site.
- Inform workers about potential respiratory hazards.
- Ensure respiratory PPE provided are maintained in good condition.
- Ensure written guidelines for fitting, care, and use of all the PPE is readily available and workers are made aware of it.
- Ensure the Preventative Maintenance Schedule is updated accordingly.
- Ensure the PPE is inspected as part of PSA.
- Review respirator compliance and requirements in safety meetings with all workers.
- Ensure fit tests have been completed by workers.
- Advise a worker of the existence of any potential or actual danger to the health and safety of the worker of which the supervisor is aware.
- Take every precaution reasonable in the circumstances for the protection of a worker.
- Ensure that respiratory protection provided are used as prescribed by, management, supervisors, workers, sub-contractors, suppliers, and other workplace parties, as required.

## 9.3. Worker

- Every worker shall wear respiratory protection equipment at all times when on a project and other workplace as required.
- Report to his or her employer or supervisor the absence of or defect in any respiratory protection equipment of which the worker is aware and which may endanger himself, herself, or another worker.

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- Participate in PPE inspection as part of PSA.
- Review Respiratory Protection Guidelines and be familiar with fitting, care, and use of the PPE.
- Ensure all respiratory protection equipment provided are stored, cleaned, and maintained in good condition.
- Be informed of all hazards and potential hazards on a project.
- Shall not to remove or make ineffective any protective device required by the regulations or by the employer.

#### **9.4. Other Workplace Parties (Suppliers, Sub-contractors)**

- Ensure respiratory protection devices are in good condition.
- Ensure respiratory protection is worn at all project sites and other workplaces as required.

## **11 Related Documents/Forms**

- BESTCO-PLY-06.0 – Personal Protective Equipment Policy
- BESTCO-PRO-06.0 – Personal Protective Equipment Procedure
- Respirator Pre-use Inspection Checklist
- Daily Pre-job Safety Assessment (PSA)
- Job Hazard Analysis
- PPE Matrix
- Preventative Maintenance Schedule
- Safe Work Practices/Safe Job Procedures
- New Employee Orientation Form
- Site Orientation Form
- Training Records/Certificates


## **12 Document and Record Maintenance**

Documents and Records are maintained as per **BESTCO-PRO-01.2-Document and Record Control Procedure**.


## **13 Record Retention**

Records are to be retained for a minimum of 3 years. Records will remain legible and readily identifiable.

## **14 Legislated/Other References**


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- Duties of employers – Occupational Health and Safety Act, s. 25, 26
- Duties of constructors – Occupational Health and Safety Act, s. 23
- Duties of supervisors – Occupational Health and Safety Act, s. 27
- Duties of workers– Occupational Health and Safety Act, s. 28
- O. Reg. 213/91: Construction Projects under Occupational Health and Safety Act
- O. Reg. 851: Industrial Establishments under Occupational Health and Safety Act
- Other applicable Regulations and standards.
- CAN/CSA-Z94.4-18 - Selection, use, and care of respirators
- CSA Z180.1:19 - Compressed breathing air and systems
- Manufacturers Guidelines

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# Eye and Face Protection Guidelines

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## 1 Purpose

The purpose of this procedure is to ensure that all employees receive appropriate information of Personal Protective Equipment (PPE) to protect their health and safety while performing their assigned duties. PPE is required to protect workers against hazards when other controls are not feasible, or to supplement other controls.

## 2 Scope

This program applies to any worker who may be exposed to eye or face hazards such as flying objects, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors or potentially injurious light radiation during the course of work at Bestco Construction Ltd.

## 3 Procedure

### 3.1. Potential Hazards

- Flying objects
- Molten metals
- Splashing liquids
- Ultraviolet, infrared, and visible radiation (welding)


### 3.2. Types of Eye and Face Protection

- a. Safety glasses – Provides minimum protection and are for general working conditions where dust, chips or flying particles may present a hazard. They are available in a variety of styles and provide side protection in the form of shields or wraparound arms. Lenses should have an anti-fog treatment.
- b. Goggles – Provide higher impact, dust and acid or chemical splash protection than safety glasses. Moulded goggles are suitable when workers are continually exposed to splash or fine dust particles and should have indirect venting. There are two types of goggles:

- Eyecup goggles
- Cover goggles.

Both must meet the CSA Z94.3:20

- c. Face shields – Protect the full face from injury and they offer the highest impact protection and shelter from spraying, chipping, grinding, chemicals, and blood borne hazards. A face shield is considered a secondary safeguard to protective eyewear; it should never be worn without safety glasses or goggles.

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- d. Welding goggles – Prevent exposure to harmful radiation, when arc welding, gas welding or burning. These protectors come in various shades, so wear the right one for the job
- e. Prescription Safety Glasses – If you wear prescription glasses, check whether they qualify as safety eyewear.
  - Glasses must be CSA approved.
  - Glasses must have side shields.
  - Lenses must be made out of polycarbonate or plastic.
  - Look for manufacturer’s logo moulded or etched into the top outside edges of the lenses.
  - Look for “Z87” on the temple pieces.
- f. Hoods - Non-rigid helmets or hoods come with impact resistant windows usually made of plastic. An air supply system may also be incorporated. Hoods may be made of non-rigid material for use in confined spaces and of collapsible construction for convenience in carrying and storing. The different types are listed below:
  - 5A – Hoods with impact-resistant window
  - 5B – Hoods for dust, splash, and abrasive materials protection
  - 5C – Hoods with radiation protection
  - 5D – Hoods for high-heat applications.
- g. Respirator Facepieces - For more information about respirator facepieces, refer to Respiratory Protection Guideline. The different types are listed below
  - 7A – Respirator facepieces for impact and splash protection
  - 7B – Respirator facepieces for radiation protection
  - 7C – Respirator facepieces with loose-fitting hoods or helmets
  - 7D – Respirator facepieces with loose-fitting hoods or helmets for radiation protection.


## 4 Purchasing Criteria

The type of eye and face protection purchased is based on several considerations:

- a. Type of workplace hazards
- b. Relative fit of eye and face protection
- c. Safety glasses are industrial protection lenses or meets the requirements of the CSA Z94.3:20- standard and other relevant criteria (SDSs, legislative requirements, JHAs, SWP/SJPs).
- d. Eye and Face protection do not restrict

## 5 Selection of Eye Protection



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Bestco Construction Ltd. considers eye protection as basic PPE that should be worn as needed. Determination of type and necessity for PPE will be contingent on the hazard assessment of task performed by a competent person. Relevant SDSs, legislated requirements and CSA standards will be taken into consideration when performing hazard assessment. Refer to **BESTCO-PRO-06.0 – Personal Protective Equipment Procedure** to distinguish between “**Basic**” and “**Specialized**” PPE.

Selection of eye and face protection will be based on guidelines from CSA Z94.3.1-16 “Guideline for selection, use and care of eye and face protectors”.

## 6 Fit, Care and Use


In order to get the maximum benefit from safety eyewear, your glasses need to fit and must be kept clean and when not in use stored in a place where they are not being harmed.

### 6.1. Fit

- Ensure your safety eye wear fits properly. Eye wear should cover from the eyebrow to the cheekbone, and across from the nose to the boney area on the outside of the face and eyes. Eye size, bridge size and temple length all vary. Eye wear should be individually assigned and fitted so that gaps between the edges of the device and the face are kept to a minimum.
- Eye wear should fit over the temples comfortably and over the ears. The frame should be as close to the face as possible and adequately supported by the bridge of the nose.
- Lens coatings, venting or fittings may be needed to prevent fogging.
- Do not modify eye/face protection.
- Do not substitute regular prescription glasses for safety glasses. Do not wear contact lenses in an area where air borne particles or gases are present.
- Ensure the safety stamp for safety glasses is located on the frame inside the temple near the hinges of the glasses.

### 6.2. Use

- Workers are required to wear safety glasses based on their task specific activities.
- When possible, avoid wearing contact lenses on site. This increases the risk of dust and other particles getting stuck underneath the lens.
- Spectacles are to be worn underneath additional eye protectors if they're needed to prevent a hazard.

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- Users should be able to see in all directions without any major obstructions in their field of view.

### 6.3. Care

- Eye and face protection devices need to be inspected adhering to the **Pre-Use Inspection checklist** requirements and subsequently maintained.
- Clean your devices daily. Follow the manufacturer's instructions.
- Handle frames with care and check daily for cracks and scratches.
- Avoid rough handling that can scratch lenses. Scratches impair vision and can weaken lenses.
- Store your devices in a clean, dry place where they cannot fall or be stepped on for example in a case when they are not being worn.
- Replace scratched, pitted, broken, bent or ill-fitting devices immediately. Damaged devices 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. Do not change or modify the protective device.

## 7 Maintenance

Accurate records of the handling, storage, use and disposal of eye and face protection equipment shall be maintained.


- The maintenance tracker will have information pertaining to:
  - The maintenance frequency.
  - Any modifications, repairs, maintenance, and disposals performed.
  - The date maintenance was conducted.

Maintain and make such records available to the affected workers, if needed.

## 8 Responsibilities

### 8.1. Management

- Ensure eye and face PPE as prescribed are provided to all workers.
- Ensure eye and face PPE provided are maintained in good condition. Ensure supplies are replenished as required.
- Ensure the Preventative Maintenance Schedule is updated accordingly.
- Ensure the PPE is inspected as part of PSA.

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- Ensure that respiratory protection provided are used as prescribed by; management, supervisors, workers, sub-contractors, suppliers, and other workplace parties, as required.

## 8.2. Supervisor

- Ensure that workers work in the appropriate manner and with the appropriate eye and face equipment, measures and procedures required by the occupational health and safety act and regulations.
- Ensure eye and face PPE are used properly by all workers on site.
- Ensure eye and face PPE provided are maintained in good condition.
- Ensure written guidelines for fitting, care, and use of all the PPE is readily available and workers are made aware of it.
- Ensure the Preventative Maintenance Schedule is updated accordingly.
- Ensure the PPE is inspected as part of PSA.
- Review eye and face protection compliance and requirements in safety meetings with all workers.
- Ensure fit tests have been completed by workers.
- Advise a worker of the existence of any potential or actual danger to the health and safety of the worker of which the supervisor is aware.
- Take every precaution reasonable in the circumstances for the protection of a worker.
- Ensure that respiratory protection provided are used as prescribed by, management, supervisors, workers, sub-contractors, suppliers, and other workplace parties, as required.

## 8.3. Worker

- Every worker shall wear eye and face protection equipment at all times when on a project and other workplace as required.
- Report to his or her employer or supervisor the absence of or defect in any eye and face protection equipment of which the worker is aware and which may endanger himself, herself, or another worker.
- Participate in PPE inspection as part of PSA
- Review eye and face Protection Guidelines and be familiar with fitting, care, and use of the PPE.
- Ensure all eye and face protection equipment provided are stored, cleaned, and maintained in good condition.
- Be informed of all hazards and potential hazards on a project.

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- Shall not to remove or make ineffective any protective device required by the regulations or by the employer.

#### 8.4. Other Workplace Parties (Suppliers, Sub-contractors)

- Ensure that the eye and face protection devices are in good condition.
- Ensure eye and face protection is worn at all project sites and other workplaces as required.

## 9 Related Documents/Forms

- BESTCO-PLY-06.0 – Personal Protective Equipment Policy
- BESTCO-PRO-06.0 – Personal Protective Equipment Procedure
- Daily Pre-job Safety Assessment (PSA)
- Job Hazard Analysis
- PPE Matrix
- Preventative Maintenance Schedule
- Safe Work Practices/Safe Job Procedures
- New Employee Orientation Form
- Site Orientation Form
- Training Records/Certificates

## 10 Document and Record Maintenance


Documents and Records are maintained as per **BESTCO-PRO-01.2-Document and Record Control Procedure**.

## 11 Record Retention


Records are to be retained for a minimum of 3 years. Records will remain legible and readily identifiable.

## 12 Legislated/Other References

- Duties of employers – Occupational Health and Safety Act, s. 25, 26
- Duties of constructors – Occupational Health and Safety Act, s. 23
- Duties of supervisors – Occupational Health and Safety Act, s. 27
- Duties of workers– Occupational Health and Safety Act, s. 28
- Construction Projects Regulation 213/91, s.24
- CSA Z94.3:20 Eye and face protectors


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- CSA Z94.3.1-16 Guideline for selection, use, and care of eye and face protectors
- Manufacturers Guidelines

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# Foot Protection Guidelines

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## 1 Purpose

The purpose of this policy is to ensure that all employees receive appropriate information of Personal Protective Equipment (PPE) to protect their health and safety while performing their assigned duties. PPE is required to protect workers against hazards when other controls are not feasible, or to supplement other controls.

## 2 Scope

This program applies to any worker who may be exposed to variety of injuries, impact, compression, and puncture during the course of work at Bestco Construction Ltd.

## 3 Procedure:

### 3.1. Potential Hazards


- Compression
- Puncture injuries
- Impact

## 4 Purchasing Criteria

Footwear will be purchased based on the hazards that are present. Assess the workplace and work activities for:

- Materials handled or used by the worker.
- Risk of objects falling onto or striking the feet.
- Any material or equipment that might roll over the feet.
- Any sharp or pointed objects that might cut the top of the feet.
- Objects that may penetrate the bottom or side of the foot.
- Possible exposure to corrosive or irritating substances.
- Possible explosive atmospheres including the risk of static electrical discharges.
- Risk of damage to sensitive electronic components or equipment due to the discharge of static electricity.
- Risk of coming into contact with energized conductors of low to moderate voltage (e.g., 220 volts or less).
- Type of walking surface and environmental conditions workers may be exposed to (e.g., loose ground cover, smooth surfaces, temperature, wet/oily, chemicals, etc.).
- Also, evaluate the risk:
  - to ankles from uneven walking surfaces or rough terrain
  - of foot injury due to exposure to extreme hot or cold
  - of slips and falls on slippery walking surfaces



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- of exposure to water or other liquids that may penetrate the footwear causing damage to the foot and the footwear
  - of exposure to rotating or abrasive machinery (e.g., chainsaws or grinders)
1. All jurisdictions in Canada require that workers wear adequate protection against workplace hazards. For workers exposed to foot hazards, the required protection is protective footwear certified by the CSA Group (CSA Standard "Protective Footwear", CSA-Z195:14 (R2019).
  2. All working footwear, for both men and women, whether it is safety wear or not, should provide comfort without compromising protective value. In addition, protective footwear should conform to CSA Standard CAN/CSA-Z195 or appropriate standard (SDSs, legislative requirements, JHAs and SWP/SJPs) for your jurisdiction.
    - A steel toe cap should cover the whole length of the toes from tips to beyond the natural bend of the foot. A soft pad covering the edge of the toecap increases comfort. If the toecap cuts into the foot, either the size or style of the footwear is incorrect.
    - Soles come in a variety of thicknesses and materials. They need to be chosen according to the hazards and type(s) of flooring in the workplace.
    - Uppers of protective footwear come in a variety of materials. Selection should take into account the hazards, and individual characteristics of the worker's foot.
    - A steel midsole which protects the foot against penetration by sharp objects should be flexible enough to allow the foot to bend.
    - No one type of non-slip footwear can prevent the wearer from slipping on every surface type.

## 5 Selection of Foot Protection

Bestco Construction Ltd. considers safety boots as mandatory general PPE. Anyone visiting or working on [Title] site and property are required to wear CSA approved safety boots. Any additional requirements for foot protection will be contingent on the hazard assessment for the task performed by a competent person. Relevant SDSs, legislated requirements and CSA standards will be taken into consideration when performing hazard assessment. Refer to **BESTCO-PRO-06.0 – Personal Protective Equipment Procedure** to distinguish between “**Basic**” and “**Specialized**” PPE.

Selection of foot protection will be based on guidelines from CSA Z195.1-16 “Guideline on selection, care, and use of protective footwear”.

## 6 Proper Fit, Use and Care

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### 6.1. Fit

- Try on new boots around midday. Feet normally swell during the day.
- Walk in new footwear to ensure it is comfortable.
- Boots should have ample toe room (toes should be about 12.5 mm from the front). Do not expect footwear to stretch with wear.
- Make allowances for extra socks or special arch supports when buying boots. Try on your new boots with the supports or socks you usually wear at work. Check with the manufacturer if adding inserts affects your level of protection.
- Boots should fit snugly around the heel and ankle when laced.
- Do not modify safety footwear.

### 6.2. Use


- Footwear inspections should be made during the daily Pre-Job Safety Assessment (PSA)
- Use High-cut boots to provide support against ankle injury (260mm or 9 in).
- Lacing up boots fully in military style allows faster removal. In the case of an emergency, surface laces can be cut to release the boot from the user.
- Double layer socks in the winter by wearing one pair of light socks covered by one pair of wool socks. Check periodically for signs of frost bite.

### 6.3. Care

- Use a protective coating to make footwear water-resistant.
- Inspect footwear regularly for damage (e.g., cracks in soles, breaks in leather, or exposed toe caps).
- Repair or replace worn or defective footwear.
- Electric shock resistance of footwear is greatly reduced by wet conditions and with wear.
- Footwear exposed to sole penetration or impact may not have visible signs of damage. Replacing footwear after an event is advisable.
- Use a protective boot dressing to help the boot last longer and provide greater water resistance (wet boots conduct current).

## 7 Responsibilities:

### 7.1. Management

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- Ensure that foot protection is used as prescribed by; management, supervisors, workers, sub-contractors, suppliers and other workplace parties, as required.
- Ensure that PPE is inspected as part of PSA.

## 7.2. Supervisor

- Ensure that workers work in the appropriate manner and with the appropriate foot protection, measures and procedures required by the occupational health and safety act and regulations.
- Ensure foot protection are used properly by all workers on site.
- Ensure written guidelines for fitting, care, and use of all the PPE is readily available and workers are made aware of it.
- Ensure the PPE is inspected as part of PSA.

## 7.3. Worker


- Every worker shall wear foot protection at all times when on a project and other workplace as required.
- Participate in PPE inspection as part of PSA.
- Review Protective Footwear Guidelines and be familiar with fitting, care, and use of the PPE.
- Ensure all PPE are stored, cleaned, and maintained in good condition.

## 7.4. Other Workplace Parties (Contractors, Service Providers, Visitors, etc.)

- Ensure that foot protection is in good condition.
- Ensure foot protection is worn on site.

# 8 Related Documents/Forms

- BESTCO-PLY-06.0 – Personal Protective Equipment Policy
- BESTCO-PRO-06.0 – Personal Protective Equipment Procedure
- Daily Pre-job Safety Assessment (PSA)
- Job Hazard Analysis
- PPE Matrix
- Preventative Maintenance Schedule
- Safe Work Practices/Safe Job Procedures
- New Employee Orientation Form
- Site Orientation Form

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- Training Records/Certificates

## 9 Document and Record Maintenance


Documents and Records are maintained as per **BESTCO-PRO-01.2-Document and Record Control Procedure**.

## 10 Record Retention

Records are to be retained for a minimum of 3 years. Records will remain legible and readily identifiable.


## 11 Legislated/Other References:

- Duties of employers – Occupational Health and Safety Act, s. 25, 26
- Duties of constructors – Occupational Health and Safety Act, s. 23
- Duties of supervisors – Occupational Health and Safety Act, s. 27
- Duties of workers– Occupational Health and Safety Act, s. 28
- Construction Projects Regulation 213/91, s.23
- CSA Z195:14 (R2019) Protective footwear
- CSA Z195.1-16 Guideline on selection, care, and use of protective footwear
- Manufacturers Guidelines

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# Hearing Protection Guidelines

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## 1 Purpose

The purpose of this procedure is to ensure that all employees receive appropriate information of Personal Protective Equipment (PPE) to protect their health and safety while performing their assigned duties. PPE is required to protect workers against hazards when other controls are not feasible, or to supplement other controls.

## 2 Scope

This program applies to any worker who may be exposed to noise exposure that exceeds 85 decibels during the course of work at Bestco Construction Ltd.

## 3 Procedure


### 3.1. Types of Ear Protection

- a) **Premoulded Ear Plugs** - Come in different sizes and shapes to fit different sized ear canals. Come in many shapes and sizes to suit different ear canals as they do not great expansion or contraction properties. Obtaining a good seal with the ear canal may be challenging.
- b) **Formable or Foam Ear Plugs** - When placed in the ear correctly, this type of ear plug, will expand to fill the ear canal and seal against the walls. This elasticity allows foam ear plugs to fit ear canals of different sizes.
- c) **Earmuffs** - These devices fit against the head and enclose the entire perimeter of the external ear. It consists of two insulated plastic cups with the inside of each muff cup being lined with acoustic foam, which reduces noise. Their effectiveness depends on how tight the seal is between the foam cushion and the head.
- d) **Hearing Bands or Canal Caps** - These devices cover the ear canal at its opening. They do not provide as much of a seal inside the ear canal and generally provide less protection than earmuffs or plugs, so they are typically not recommended.

## 4 Purchasing Criteria

When purchasing hearing protection, the following factors are considered:

- Correct for the job. Refer to the Canadian Standards Association (CSA) Standard Z94.2-14 (R2019) "Hearing Protection Devices - Performance, Selection, Care and Use" or contact the agency responsible for occupational health and safety legislation in your jurisdiction for more information.
- Provides adequate protection, manufacturer's guidelines will be checked.

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- Review of hazard assessment library, SWP/SJPs and SDSs where applicable.
- Compatible with other required personal protective equipment, or communication devices.
- Comfortable enough to be accepted and worn.
- Appropriate for the temperature and humidity in the workplace.
- Able to provide adequate communication and audibility needs (e.g., the ability to hear alarms or warning sounds).

## 5 Selection of Hearing Protection

Bestco Construction Ltd. considers hearing protection as basic PPE that should be worn as needed. Determination of type and necessity for PPE will be contingent on the hazard assessment of task performed by a competent person. Relevant SDSs, legislated requirements and CSA standards will be taken into consideration when performing hazard assessment. Refer to **BESTCO-PRO-06.0 – Personal Protective Equipment Procedure** to distinguish between “**Basic**” and “**Specialized**” PPE.

Selection of hearing protection will be based on guidelines from CSA-Z94.2-14 “Guideline for performance, selection, care, and use of hearing protection devices”.

## 6 Proper Fit, Use, and Care


### 6.1. Fit

- Follow the manufacturer's instructions.
- With ear plugs, for example, the ear should be pulled outward and upward with the opposite hand to enlarge and straighten the ear canal and insert the plug with clean hands.
- Ensure the hearing protector tightly seals within the ear canal or against the side of the head. Hair and clothing should not be in the way.
- Do not wear hearing protection that are too small or too large.
- Do not wear hearing protection that does not cover the ear area properly.

### 6.2. Use

- Bestco Construction Ltd. will provide workers with adequate training on the use of the device.
- Workers are to review the online module for hearing protection prior to initial commencement of work.
- Hearing protection is to be worn at all times.



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### 6.3. Care

- Follow the manufacturer's instructions.
- Hearing protection should be regularly checked for wear and tear with the aid of the **Pre-use inspection checklist**.
- Replace ear cushions or plugs that are no longer pliable.
- Replace a unit when head bands are so stretched that they do not keep ear cushions snugly against the head.
- Disassemble earmuffs to clean.
- Wash earmuffs with a mild liquid detergent in warm water, and then rinse in clear warm water. Ensure that the sound-attenuating material inside the ear cushions does not get wet.
- Use a soft brush to remove skin oil and dirt that can harden ear cushions.
- Squeeze excess moisture from the plugs or cushions and then place them on a clean surface to air dry. Check the manufacturer's recommendations first to find out if the ear plugs are washable.

## 7 Maintenance


Accurate records of the handling, storage, use and disposal of hearing protection equipment shall be maintained.

- The maintenance tracker will have information pertaining to:
  - The maintenance frequency.
  - Any modifications, repairs, maintenance, and disposals performed.
  - The date maintenance was conducted.
  - Maintain and make such records available to the affected workers, if needed.

## 8 Responsibilities

### 8.1. Management

- Ensure proper hearing PPE as prescribed is provided to all workers.
- Ensure hearing PPE provided are maintained in good condition.
- Ensure supplies are replenished as required.
- Ensure the Preventative Maintenance Schedule is updated accordingly.
- Ensure the PPE is inspected as part of PSA.

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- Ensure that hearing PPE provided are used as prescribed by; management, supervisors, workers, sub-contractors, suppliers, and other workplace parties, as required.

## 8.2. Supervisor

- Ensure that workers work in the appropriate manner and with the appropriate hearing equipment, measures and procedures required by the occupational health and safety act and regulations.
- Ensure hearing PPE are used properly by all workers on site.
- Ensure hearing PPE provided are maintained in good condition.
- Ensure written guidelines for fitting, care, and use of all the PPE is readily available and workers are made aware of it.
- Ensure the Preventative Maintenance Schedule is updated accordingly.
- Ensure the PPE is inspected as part of PSA.
- Review hearing protection compliance and requirements in safety meetings with all workers.
- Ensure fit tests have been completed by workers.
- Advise a worker of the existence of any potential or actual danger to the health and safety of the worker of which the supervisor is aware.
- Take every precaution reasonable in the circumstances for the protection of a worker.
- Ensure that hearing protection provided are used as prescribed by, management, supervisors, workers, sub-contractors, suppliers, and other workplace parties, as required.

## 8.3. Worker

- Every worker shall wear hearing PPE at all times when on a project and other workplace as required.
- Report to his or her employer or supervisor the absence of or defect in any hearing protection equipment of which the worker is aware and which may endanger himself, herself, or another worker.
- Participate in PPE inspection as part of PSA.
- Review Hearing Protection Guidelines and be familiar with fitting, care, and use of the PPE.
- Ensure all hearing protection equipment provided are stored, cleaned, and maintained in good condition.
- Be informed of all hazards and potential hazards on a project.

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- Shall not to remove or make ineffective any protective device required by the regulations or by the employer.

#### 8.4. Other Workplace Parties

- Ensure that the hearing protection devices are in good condition.
- Ensure hearing protection is worn at all project sites and other workplaces as required.

## 9 Related Documents/Forms

- BESTCO-PLY-06.0 – Personal Protective Equipment Policy
- BESTCO-PRO-06.0 – Personal Protective Equipment Procedure
- Daily Pre-job Safety Assessment (PSA)
- Pre-use Inspection Checklist
- Job Hazard Analysis
- PPE Matrix
- Preventative Maintenance Schedule
- Safe Work Practices/Safe Job Procedures
- New Employee Orientation Form
- Site Orientation Form
- Training Records/Certificates

## 10 Document and Record Maintenance


Documents and Records are maintained as per **BESTCO-PRO-01.2-Document and Record Control Procedure**.

## 11 Record Retention


Records are to be retained for a minimum of 3 years. Records will remain legible and readily identifiable.

## 12 Legislated/Other References

- Duties of employers – Occupational Health and Safety Act, s. 25, 26
- Duties of constructors – Occupational Health and Safety Act, s. 23
- Duties of supervisors – Occupational Health and Safety Act, s. 27
- Duties of workers– Occupational Health and Safety Act, s. 28
- Noise Regulation O. Reg. 381/15


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- CSA Z107.56 - Measurement of Noise Exposure
- CSA Z94.2-14 (R2019) - Hearing protection devices - Performance, selection, care, and use
- Manufacturers Guidelines

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# Hand and Skin Protection Guidelines

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## 1 Purpose

The purpose of this procedure is to ensure that all employees receive appropriate information of Personal Protective Equipment (PPE) to protect their health and safety while performing their assigned duties. PPE is required to protect workers against hazards when other controls are not feasible, or to supplement other controls.

## 2 Scope

This program applies to any worker who may be exposed to injuries such as burns, cuts, scrapes, puncture wounds, radiation, chemical exposures, etc. during the course of work. The types of skin protection included but are not limited to in this policy include gloves, high visibility vests/shirts, aprons, and coveralls.

## 3 Procedure

Workers should wear proper hand and skin protection when working on site. On every construction project, workers are required to use the appropriate protection when there is a risk of injury from contact between the worker's skin and:

- A noxious gas, liquid, fume, or dust
- An object that may puncture, cut, or abrade the skin,
- A hot object, hot liquid, or molten metal
- Radiant heat


Wearing hand/skin protection will reduce the exposure to physical, chemical and radiation hazards.

### 3.1. Radiation

- Workers who work outdoors are at risk of ultraviolet radiation. Long-term risks such as skin cancer and melanoma can be caused by the exposure to sunlight, which is the main source of UV radiation.
- The following are what workers can do to reduce the exposure of UV radiation:
  - Apply SPF 30 sunscreen on a regular basis
  - Add UV protection to the back of your neck by using a fabric neck protector that clips onto the hard hat
  - Wear clothing that covers as much of the skin as possible. Tighter woven material will offer greater protection are ideal.

### 3.2. Dress Code

- (a) Summer Dress Code

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All Workers must wear a minimum of a full T-shirt and long pants to prevent injury from the elements and harmful substances. Exposed skin must be protected with sun block if working outside. No shorts or tank tops are permitted.

(b) Winter Dress Code

Several layers of clothing are recommended. Workers must cover any exposed skin.

(c) Working in Extreme Weather Conditions

Workers are required to remain alert of working in extreme heat. Preventative measures for reducing the risk of heat stress include the following:

- Wear light, clothing
- Schedule breaks inside of the cool-down area (Site Trailer) if possible
- Use sunscreen and keep the head covered
- Keep hydrated (bottled water is kept in the Site Trailer)
- Report Heat Stress concerns to the Project Supervisor

When working in extreme cold, Workers must consider the following measures to mitigate the risks of cold related illnesses:

- Schedule breaks inside of the designated warming station (Site Trailer) if possible
- Drink warm fluids
- Wear many thin warm layers of clothing


When working in either extreme heat or extreme cold, Workers must carefully assess their own personal limitations. If any Worker feels they are unable to Work in the conditions, they are requested to report to their Project Supervisor or Subcontractor Foreman and express their concerns.

## 4 Purchasing Criteria for Hand Protection

PPE for hand protection will be purchased to suit the job. Applicable legislation, JHA, SWP/SJPs will serve as guidance during procurement process.

Hazard Type	Degree of Hazard	Protective Material
Abrasions	Severe	Reinforced heavy rubber, staple reinforced heavy leather
	Moderate	Rubber, plastic, leather, polyester, nylon, cotton
Sharp-		Metal mesh, staple-reinforced




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Hazard Type	Degree of Hazard	Protective Material
<b>Edged Objects</b>	Severe/Moderate	heavy leather, Kevlar-steel mesh
	Light	Lightweight leather, polyester, nylon, or cotton
<b>Chemicals and Fluids</b>	Varies according to the SDS of the chemical	Generally includes; natural rubber latex, butyl rubber, neoprene, and nitrile
<b>Electricity</b>	All types of electrical work	Rubber-insulating gloves and mitts tested to the appropriate voltage (CSA Standard Z259.4-M1979 and CSA Z462:21)
<b>Cold</b>	<4°C	Leather, insulated plastic or rubber, wool, cotton, cold resistant specialty fabrics. Ensure they are loose fitting for liquid nitrogen or carbon dioxide. (Cold Environments - Working in the Cold – CCOHS)
<b>Heat</b>	High Temperatures (>350°C)	Asbestos. (Chemical Protective Clothing - Glove Selection – CCOHS)
	Medium-High temperatures (100 – 350°C)	Nomex®, Kevlar®, heat-resistant leather with linings, terry cloth (aramid fiber). (Chemical Protective Clothing - Glove Selection – CCOHS)
	Warm Temperatures (<100°C)	Chrome-tanned leather, terry cloth. (Chemical Protective Clothing - Glove Selection – CCOHS)

## 5 Selection of Hand Protection

Bestco Construction Ltd. considers hand protection as specialized PPE that should be worn as needed. Determination of type and necessity for PPE will be contingent on the hazard assessment of task performed by a competent person. Relevant Safety Data Sheets (SDS)s and legislated requirements will be taken into consideration when performing hazard assessment. Refer to **BESTCO-PRO-06.0 – Personal Protective Equipment Procedure** to distinguish between “Basic” and “Specialized” PPE.

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SDSs of the hazardous chemical shall be reviewed in order to select the type of gloves.

## 6 Fitting, Care, and Use of Gloves

### 6.1. Pre-use Inspection and Fit


- Gloves should be inspected using the **Pre-use inspection Checklist**.
- Inspect the gloves for discoloration, holes, stiffness, and tears before each use.
- Inflate rubber gloves to test for leaks before wearing.
- Ensure that the glove fits correctly. It should allow for maximum dexterity and mobility of your hand and fingers when carrying out task.

### 6.2. Use

- No single glove material will protect against all chemicals. Ensure glove is appropriate for the hazard that is being handled.
- Depending on the type of glove, chemical resistance will vary product to product and from manufacturer to manufacturer.
- No glove will be totally impermeable, discard hand protection well before you believe there may be chemical break through.
- Additional factors affecting glove performance include:
  - Increased exposure due to increase chemical concentration
  - Increase exposure due to direct immersion of chemical
  - Increase temperature
  - Mixture of Chemicals
  - Increased use

### 6.3. Care and Maintenance

- Gloves should be used only for the task that it is required.
- Before re-using gloves consider the duration that they have been used for, temperature and relative toxicity of the chemicals that they have been exposed to. These factors may contribute to the overall degradation of the gloves.
- Wash hands directly after each use of the gloves.
- Do not reuse disposable gloves.
- Store reusable gloves in a way that prevents damage from external exposures (e.g., in a sealed Ziploc bag) and according to the manufacturer's instructions.

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- Be aware that some individuals may be allergic to latex and ensure that alternatives are available.

## 7 Purchasing Criteria for High Visibility Vests

High Visibility vest and shirts will be purchased based on the hazards that are present. The following specification will be considered in conjunctions with the workplace activities:

1. Apparel meets and complies with CSA Standard Z96:22 or the appropriate standard (SDSs, legislative requirements, JHAs and SWP/SJPs) for your jurisdiction.
2. Class of apparel – classes are determined by the amount of body coverage


Class of Apparel	Function
Class 3	Greatest body coverage (upper torso, over the shoulders and bands encircling both arms and both legs) and visibility under poor light conditions and at great distance.
Class 2	Moderate body coverage (full coverage of upper torso) and superior visibility.
Class 1	Lowest recognized coverage (basic harness or stripes/bands over the shoulders and waist) and good visibility.

3. Retroreflective Level

Class of Apparel	Function
Level 2	Highest retroreflective performance, visible under dark conditions from a great distance
Level 1	High retroreflective performance, visible under dark conditions from a moderate distance.
Level FR	Special low-level retroreflective performance appropriate only for apparel designed to provide protection against brief exposure to flames and electrical arc flash.

## 8 Selection of High Visibility Vest and Shirts

Bestco Construction Ltd. considers high visibility vest/shirts as mandatory general PPE. Anyone visiting or working on [Title] site and property are required to wear CSA approved

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high visibility vest/shirt. Any additional requirements for skin protection will be contingent on the hazard assessment for the task performed by a competent person. Relevant SDSs, legislated requirements and CSA standards will be taken into consideration when performing hazard assessment. Refer to **BESTCO-PRO-06.0 – Personal Protective Equipment Procedure** to distinguish between “Basic” and “Specialized” PPE.

Selection of hand and skin protection will be based on guidelines from CSA Z96.1-08 “Guideline on selection, use, and care of High-Visibility Safety Apparel”.

## 9 Fitting, Use, and Care of High Visibility Vests

### 9.1. Fitting

- When other PPE is required, it should be worn during the fit evaluation of the high visibility safety apparel (shirts and vests) to ensure that there is no interference with the function of either.


### 9.2. Use

- Ensure that the shirt/vest is worn as intended – done up properly around the body with no loose or dangling components.
- Ensure high-visibility elements are incorporated into the PPE or apparel is designed to ensure these elements are visible. The use of equipment or other PPE, such as radio, fall protection harness and high-top safety boots may obscure or reduce the effectiveness of the high visibility garment.
- If entanglement hazard exists, wear high-visibility safety apparel with a tear-away function

### 9.3. Care

- Inspections should be done during the daily Pre-Job Safety Assessment
- Inspect the high-visibility vest and shirts before and after each use to ensure that it is clean and in good condition:
  - Component parts, closures, pockets, high-visibility trim; and
  - Background material (e.g. contaminants, fraying, holes, cuts, fading, seam deterioration)
- Report any piece of defective equipment and report it to the supervisor.
- For optimal performance, ensure the vest/shirt is kept clean and laundered according to the manufacturer’s instructions.

## 10 Maintenance

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Accurate records of the handling, storage, use and disposal of hand and skin protection equipment shall be maintained.

- The maintenance tracker will have information pertaining to:
  - The maintenance frequency.
  - Any modifications, repairs, maintenance, and disposals performed.
  - The date maintenance was conducted.
  - Maintain and make such records available to the affected workers, if needed.


## 11 Responsibilities

### 11.1. Management

- Ensure proper hand and skin PPE as prescribed is provided to all workers.
- Ensure hand and skin PPE provided are maintained in good condition
- Ensure supplies are replenished as required.
- Ensure the Preventative Maintenance Schedule is updated accordingly.
- Ensure the PPE is inspected as part of PSA.
- Ensure that hand and skin PPE provided are used as prescribed by; management, supervisors, workers, sub-contractors, suppliers, and other workplace parties, as required.

### 11.2. Supervisor

- Ensure that workers work in the appropriate manner and with the appropriate hand and skin equipment, measures and procedures required by the occupational health and safety act and regulations.
- Ensure hand and skin PPE are used properly by all workers on site.
- Ensure hand and skin PPE provided are maintained in good condition.
- Ensure written guidelines for fitting, care, and use of all the PPE is readily available and workers are made aware of it.
- Ensure the Preventative Maintenance Schedule is updated accordingly.
- Ensure the PPE is inspected as part of PSA.
- Review hand and skin protection compliance and requirements in safety meetings with all workers.
- Ensure fit tests have been completed by workers.
- Advise a worker of the existence of any potential or actual danger to the health and safety of the worker of which the supervisor is aware.
- Take every precaution reasonable in the circumstances for the protection of a worker.

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- Ensure that hand and skin protection provided are used as prescribed by, management, supervisors, workers, sub-contractors, suppliers, and other workplace parties, as required.

### 11.3. Worker

- Every worker shall wear hand and skin PPE at all times when on a project and other workplace as required.
- Report to his or her employer or supervisor the absence of or defect in any hand and skin PPE of which the worker is aware and which may endanger himself, herself, or another worker.
- Participate in PPE inspection as part of PSA
- Review Hand and Skin Protection Guidelines and be familiar with fitting, care, and use of the PPE.
- Ensure all hand and skin protection devices provided are stored, cleaned, and maintained in good condition.
- Be informed of all hazards and potential hazards on a project.
- Shall not to remove or make ineffective any protective device required by the regulations or by the employer.


### 11.4. Other Workplace Parties

This may include Contractors, Service Providers, Visitors, and any other workplace parties.

- Ensure that hand and skin protection devices are in good condition.
- Ensure that hand and skin protection is worn at all project sites and other workplaces as required.

## 12 Related Documents/Forms

- BESTCO-PLY-06.0 – Personal Protective Equipment Policy
- BESTCO-PRO-06.0 – Personal Protective Equipment Procedure
- Daily Pre-job Safety Assessment (PSA)
- Pre-use Inspection Checklist - Gloves
- Job Hazard Analysis
- PPE Matrix
- Preventative Maintenance Schedule
- Safe Work Practices/Safe Job Procedures
- New Employee Orientation Form
- Site Orientation Form

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- Training Records/Certificates

## 13 Document and Record Maintenance


Documents and Records are maintained as per **BESTCO-PRO-01.2-Document and Record Control Procedure**.

## 14 Record Retention

Records are to be retained for a minimum of 3 years. Records will remain legible and readily identifiable.

## 15 Legislated/ Other References


- Duties of employers – Occupational Health and Safety Act, s. 25, 26
- Duties of constructors – Occupational Health and Safety Act, s. 23
- Duties of supervisors – Occupational Health and Safety Act, s. 27
- Duties of workers– Occupational Health and Safety Act, s. 28
- Construction Projects Regulation 213/91, s. 25
- CSA Z96-15 (R2020) - High-visibility safety apparel
- Z96.1-08 - Guideline on Selection, Use, and Care of High-Visibility Safety Apparel
- Manufacturers Guidelines

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# Arc Flash Guidelines


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1	To meet COR 2020 Standards, company's health and safety processes and Ontario's Health and Safety Legislative Requirements.	Emma Lisson, Health and Safety Coordinator 11 July, 2025	Michael Zaborsky and Ovidiu Cotiga, Senior Management 18 August, 2025	Michael Zaborsky, President 02 September, 2025



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## 1 Purpose

The purpose of this guideline is to ensure all employees receive appropriate information regarding the dangers of Arc Flashes to protect their health and safety while performing assigned duties. Training and PPE are required to protect workers against hazards when other controls are not feasible, or to supplement other controls.

## 2 Scope

This guideline applies to any worker who may be exposed to the risk of an arc flash from energizing and deenergizing equipment, operating switches, entry into distribution stations.


## 3 Definitions

**Arc Flash Hazard** - A dangerous condition associated with the possible release of energy caused by an electric arc. An arc flash hazard may exist when energized electrical conductors or circuit parts are exposed or when they are within equipment in a guarded or enclosed condition, provided a person is interacting with the equipment in such a manner that could cause an electric arc. Under normal operating conditions, enclosed energized equipment that has been properly installed and maintained is not likely to pose an arc flash hazard.

**Arc Flash Risk Assessment** - A study investigating a worker's potential exposure to arc flash energy, conducted for the purpose of injury prevention and the determination of safe work practices, arc flash boundary, and the appropriate levels of personal protective equipment (PPE). An arc flash hazard analysis is necessary regardless of any label or marking on the surface of electrical equipment. Referring to a warning label could be one step in the analysis; however, the analysis also must consider risk. When the analysis is complete, the employee has sufficient information for selecting the necessary arc flash personal protective equipment (PPE) and the work practices necessary to minimize any exposure to a thermal hazard.

**Arc Flash Suit** - A complete arc rated clothing and equipment system that covers the entire body, except for the hands and feet.

**Arc Rating** - The value attributed to materials that describe their performance to exposure to an electrical arc discharge. The arc rating is expressed in cal/cm<sup>2</sup> and is derived from the determined value of the arc thermal.

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**Balaclava (Sock Hood)** - An arc rated hood that protects the neck and head except for the facial area of the eyes and nose.

**Boundary, Arc Flash** - When an arc flash hazard exists, an approach limit at a distance from a prospective arc source within which a person could receive a second degree burn if an electrical arc flash were to occur.

**Boundary, Limited Approach** - An approach limit at a distance from an exposed energized electrical conductor or circuit part within which a shock hazard exists. The limited approach boundary is a shock protection boundary intended to define the approach limit for unqualified employees and is used to identify a minimum distance that is considered to be safe.

**Boundary, Restricted Approach** - An approach limit at a distance from an exposed energized electrical conductor or circuit part within which there is an increased likelihood of electric shock, due to electrical arc-over combined with inadvertent movement, for personnel working in close proximity to the energized electrical conductor or circuit part. If it is necessary for a qualified employee to cross the restricted approach boundary, the employee must be protected from unexpected contact with the conductors that are energized and exposed.


**Circuit Breaker** - A device designed to open and close a circuit by non-automatic means and to open the circuit automatically on a predetermined over-current without damage to itself when properly applied within its rating.

**De-energized** - Free from any electrical connection to a source of potential difference and from electrical charge; not having a potential different from that of the earth.

**Disconnecting Means** - A device, or group of devices, or other means by which the conductors of a circuit can be disconnected from their source of supply. Disconnecting means can be one or more switches, circuit breakers, or other rated devices that might be used to disconnect electrical conductors from their source of energy.

**Disconnecting (or Isolating) Switch (Disconnecter, Isolator)** - A mechanical switching device used for isolating a circuit or equipment from a source of power. Locks and tags can be installed on these devices.

**Electrical Hazard** - A dangerous condition such that contact, or equipment failure can result in electric shock, arc flash burn, thermal burn, or blast. Fire, shock, and electrocution have been considered to be electrical hazards for many years.

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**Electrical Safety** - Recognizing hazards associated with the use of electrical energy and taking precautions so that hazards do not cause injury or death. Electrical safety is a condition that can be achieved by doing the following:

1. Identifying all electrical hazards
2. Generating a comprehensive plan to mitigate exposure to the hazards
3. Providing protective schemes including training for both qualified and unqualified persons

**Electrically Safe Work Condition** - A state in which an electrical conductor or circuit part has been disconnected from energized parts, locked/tagged in accordance with established standards, tested to ensure the absence of voltage, and grounded if determined necessary. Until the electrically safe work condition exists, a risk of injury from electrical energy exists.


**Exposed (as applied to energized electrical conductors or circuit parts)** - Capable of being inadvertently touched or approached nearer than a safe distance by a person. It is applied to electrical conductors or circuit parts that are not suitably guarded, isolated, or insulated.

**Fuse** - An over current protective device with a circuit-opening fusible part that is heated and severed by the passage of over-current through it.

**Ground Fault** - An unintentional, electrically conducting connection between an ungrounded conductor of an electrical circuit and the normally non-current-carrying conductors, metallic enclosures, metallic raceways, metallic equipment, or earth.

**Guarded** - Covered, shielded, fenced, enclosed, or otherwise protected by means of suitable covers, casings, barriers, rails, screens, mats, or platforms to remove the likelihood of approach or contact by persons or objects to a point of danger. When an exposed conductor is guarded, a person who is approaching the exposed conductor is unlikely to contact the conductor.

**Incident Energy** - The amount of thermal energy impressed on a surface, a certain distance from the source, generated during an electrical arc event. Incident energy is typically expressed in calories per square centimeter (cal/cm<sup>2</sup>). Incident energy could be expressed in several different terms, such as calories per square centimeter, joules per square centimeter, or calories per square inch. However, incident energy must be expressed in the same terms in which the PPE is thermally rated. Many materials melt or ignite when heated to a few hundred degrees Fahrenheit. Incident energy raises the temperature of an employee's clothing or skin when exposure to an arcing fault exists. Predicting the amount of available incident energy is critical to prevent injury from melting or burning clothing or from direct skin exposure to incident energy.

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**Incident Energy Analysis** - A component of an arc flash hazard analysis used to predict the incident energy of an arc flash risk assessment for a specified set of conditions. This focused information allows the selection of PPE based on the conditions associated with the task being performed on a specific piece of electrical equipment.

**Motor Control Center (MCC)** - An assembly of one or more enclosed sections having a common power bus and principally containing motor control units. A motor control center typically contains starters, disconnect switches, power panels, solid-state drives, and similar components.

**Panel-board** - A single panel or group of panel units designed for assembly in the form of a single panel, including buses and automatic over-current devices, and equipped with or without switches for the control of light, heat, or power circuits.


**Qualified Person** - One who has demonstrated skills and knowledge related to the construction and operation of the electrical equipment and installations and has received safety training to identify and avoid the hazards involved. A qualified person must have the ability to recognize all electrical hazards that might be associated with the work task being considered. An employee could be qualified to perform one work task and not qualified to perform a different task.

**Shock Hazard** - A dangerous condition associated with the possible release of energy caused by contact or approach to energized electrical conductors or circuit parts. Existing documentation indicates that any person might receive a shock if the amount of current exceeds 0.020 amperes. In general, when the voltage is 50 volts or greater, a shock hazard exists.

**Short-Circuit Current Rating** - The prospective symmetrical fault current at a nominal voltage to which an apparatus or system can be connected without sustaining damage exceeding defined acceptance criteria. Short-circuit current ratings are marked on equipment such as panel boards, switchboards, busways, contactors, and starters. Adequate short circuit protection can be provided by fuses, molded-case circuit breakers, and low-voltage power circuit breakers, depending on specific circuit and installation requirements.

**Single-Line Diagram** - A diagram that shows, by means of single lines and graphic symbols, the course of an electric circuit or system of circuits and the component devices or parts used in the circuit or system.

**Switch, Isolating** - A switch intended for isolating an electric circuit from the source of power. It has no interrupting rating, and it is intended to be operated only after the circuit has been opened by some other means.

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**Switchboard** - A large single panel, frame, or assembly of panels on which are mounted on the face, back, or both, switches, over-current and other protective devices, buses, and usually instruments.

**Switchgear, Arc-Resistant** - Equipment designed to withstand the effects of an internal arcing fault and that directs the internally released energy away from the employee.

**Thermal Hazard** - An arc flash hazard exists if a person is or might be exposed to a significant thermal hazard. If the thermal hazard is of a severity that might expose a person to 1.2 calories per square centimeter (cal/cm<sup>2</sup>) or more of incident (thermal) energy, the hazard is considered to be significant. Personal protective equipment with a rating that exceeds the thermal hazard must be worn. Use of personal protective equipment for exposures with less than 1.2 cal/cm<sup>2</sup> incident energy is certainly permitted and might be deemed appropriate by the employer and employee.


**Unqualified Person** - A person who is not a qualified person.

**Working On (energized electrical conductors or circuit parts)** - Intentionally coming in contact with energized electrical conductors or circuit parts with the hands, feet, or other body parts, with tools, probes, or with test equipment, regardless of the personal protective equipment a person is wearing. There are two categories of “working on”:

1. Diagnostic (testing) is taking readings or measurements of electrical equipment with approved test equipment that does not require making any physical change to the equipment.
2. Repair is any physical alteration of electrical equipment (such as making or tightening connections, removing or replacing components, etc.).

## 4 Equipment Rating/Classifications

Category/Class	Voltage Limit	Retest Frequency
<b>Suit</b>		
CAT1 (4-7 cal/cm <sup>2</sup> )	1,000 VAC	As required
CAT2 (8-24 cal/cm <sup>2</sup> )	5,000 VAC	As required
CAT3 (25-39 cal/cm <sup>2</sup> )	13,500 VAC	As required
CAT4 (>40 cal/cm <sup>2</sup> )	>13,500 VAC	As required
<b>Gloves</b>		
Class 00	500 VAC	N/A
Class 0	1,000 VAC	N/A
Class 1	7,500 VAC	90 Days

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Class 2	17,000 VAC	90 Days
Class 3	26,500 VAC	90 Days
Class 4	36,000 VAC	90 Days
<b>Rubber Blankets, Line Hose, Couplers and Hoods</b>		
Class 0	1,000 VAC	1 year
Class 1	7,500 VAC	1 year
Class 2	17,000 VAC	1 year
Class 3	26,500 VAC	1 year
Class 4	36,000 VAC	1 year

## 5 Procedure

### 5.1. Four Step Approach to Electrical Safety

1. TURN OFF THE POWER. Work de-energized, whenever possible. This isn't always feasible.

*When working on or near exposed live conductors and parts, NFPA 70E requires the following.*

2. LIVE WORK PERMIT. Have the customer sign an Energized Electrical Work Permit.

3. PLAN THE WORK. Have a written plan for performing the live work safely.

4. USE PERSONAL PROTECTIVE EQUIPMENT (PPE). This includes flame-resistant (FR) clothing, insulated tools, face shields, and flash suits.


### 5.2. Training

All workers who may be exposed to the risk of an arc flash or blast must participate in provided Arc Flash Training. Workers in supervisory or qualified person role must be in possession of a valid Electrical License (309A). Workers who are not licensed must be under the supervision of a qualified person.

### 5.3. Safe Work Plan

- 1) Supervisor to fill out safe work plan template. Plan must cover:
  - a) Overall scope of work
  - b) Sequence of tasks
  - c) Isolation points
  - d) Lockout plan
  - e) Worker responsibilities



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- f) Contact numbers of stakeholders (GC, ESA, Electric utility, Project Owner, etc.)
  - g) Equipment assessment (arc flash ratings, boundaries, etc.)
  - h) Emergency response (those responsible, action plan, equipment required identified and available)
- 2) Safe Work Plan is to be reviewed and approved by the H&S Manager and Senior Management prior to work commencing if the equipment being worked on is more than 600V. For work less than 600V, Safe Work Plan is to be reviewed but approval not required prior to work commencing.

## 6 Personal Protective Equipment

### 6.1. Fit, Care, and Use

Before being donned for use, rubber gloves of any voltage must pass an “Air Test”. The Air Test allows the user to identify any holes or leaks that are too small for the eye to see. Follow the steps below to complete the air test.

*Note: Type I gloves should be expanded no more than 1.5 times their normal size during the air test and Type II gloves no more than 1.25 times. The procedure should be repeated after turning the glove inside out.*


1. Hold rubber glove by the cuff on either side
2. Gently roll the cuff towards the palm of the glove
3. Continue rolling until glove expands and air is trapped in the glove
4. Hold the rolled end of the glove in one hand
5. Using the free hand, move fingers of the glove to ensure any holes are not being covered
6. A pass is considered if no air escapes from the glove
7. Repeat air test with glove turned inside out

Rubber gloves or leather protectors that are damaged or not adequate to protect workers from electrical shock and burn shall not be used. Rubber gloves shall be worn with adequate leather protectors and shall not be worn inside out.

### 6.2. Inspection

Inspections shall be conducted using the **Pre-Use Inspection checklist**.



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- (a) Inspect arc flash suit for:
  - Burns, cuts, frayed material, and loose or broken stitching
  - Signs of heat or chemical damage
  - Ensure all clasps, Velcro and buttons are free from damage and operate properly
  - Ensure suit is free of debris such as dirt, dust, paint, glue, etc.
  
- (b) Inspect rubber gloves for:
  - Holes, tears, cuts, and abrasions,
  - Look for brittleness or dry/crusty material
  - Ensure they are not inside out. NEVER wear rubber gloves inside out.
  
- (c) Inspect leather gloves for:
  - Holes, tears, cuts, and abrasions
  - Frayed material, loose, or broken stitching
  
- (d) Inspect face shield and accompanying hardhat for:
  - Inspect lens for scratches, pitting, and other visibility reducing damage
  - Discoloration and brittleness indicating heat or chemical exposure
  - Inspect frames for cracks, brittleness and other wear and tear
  - Ensure all moving parts work as required and move freely
  - Inspect hardhat for cracks, dents, gouges
  - Inspect suspension for torn/broken threads, frayed or cut material


### 6.3. Certification

Protective rubber gloves used for arc flash protection above 5000V are required to be certified at intervals of:

- a) At least once every 3 months, if they are in service
- b) At least once every 6 months, if they are not in service

## 7 Responsibilities

### 7.1. Management

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- Ensure workers involved receive Arc Flash Training
- Ensure Arc Flash PPE is provided to all required workers
- Ensure lockout equipment is provided to all required workers
- Review and approve all entries and safe work plans for all tasks greater than 600V
- Review entry and safe work plan for all tasks less than 600V

## 7.2. Supervisor


- Ensure workers involved in electrical safety tasks have valid training
- Ensure all required PPE is available to workers prior to work tasks
- Ensure all lockout equipment is available to workers prior to work tasks
- Develop safe work plan for tasks involved with equipment less than 600V
- Submit safe work plan to management and H&S for review and approval
- Review safe work plan with all workers involved

## 7.3. Worker

- Participate in Arc Flash Training
- Use and wear appropriate PPE determined by work plan
- Always follow established Safe Job Procedures (Electrical Safety, Lockout-Tagout, etc.)
- Review and acknowledge safe work plan

# 8 Related Documents/Forms

- BESTCO-PLY-06.0 – Personal Protective Equipment Policy
- BESTCO-PRO-06.0 – Personal Protective Equipment Procedure
- Daily Pre-job Safety Assessment (PSA)
- Pre-use Inspection Checklist
- Job Hazard Analysis
- Preventative Maintenance Schedule
- Safe Work Practices/Safe Job Procedures
- New Employee Orientation Form
- Site Orientation Form
- Training Records/Certificates
- Energized Electrical Work Permit.
- Valid Electrical License (309A).

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## 9 Document and Record Maintenance


Documents and Records are maintained as per **BESTCO-PRO-01.2-Document and Record Control Procedure**.

## 10 Record Retention

Records are to be retained for a minimum of 3 years. Records will remain legible and readily identifiable.

## 11 Legislated/ Other References

- Duties of employers – Occupational Health and Safety Act, s. 25, 26
- Duties of constructors – Occupational Health and Safety Act, s. 23
- Duties of supervisors – Occupational Health and Safety Act, s. 27
- Duties of workers– Occupational Health and Safety Act, s. 28
- Construction Projects Regulation 213/91, s. 25, 181, 182, 183, 184, 187, 190, 191, 192, 193
- NFPA 70 E: Standard for Electrical Safety in the Workplace
- CSA Z462-2021: Workplace Electrical Safety

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## Preventative Maintenance Policy

Bestco Construction Ltd. is committed to ensuring that all workplace parties will take the necessary steps to properly maintain all tools, equipment, and vehicles to ensure that all company property is operated/maintained safely, and all workplace parties are prevented from harm. It is our policy to ensure that all tools, equipment, and vehicles are well maintained to reduce the risk of accidents or injuries.

To ensure systematic care and protection of tools, equipment, and vehicles, Bestco Construction Ltd. shall establish a preventative maintenance program that keeps all workplace parties safe and all tools, equipment, and vehicles in usable condition, limiting downtime and extending productivity. Senior Management is committed to providing the necessary budget, time, and resource for establishing and maintaining the preventative maintenance program.

The program and its performance shall be reviewed annually for sustainability, adequacy, and effectiveness.





Name: Michael Zaborsky

Title: President

Company: Bestco Construction (2005) Ltd.


Sept. 2, 2025

Date: 02 September, 2025

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# Preventative Maintenance Procedure

<b>Version No.</b>	<b>Reason for Revision:</b>	<b>Developed By and Date:</b>	<b>Reviewed By and Date:</b>	<b>Approved By and Date:</b>
1	To meet COR 2020 Standards, company's health and safety processes and Ontario's Health and Safety Legislative Requirements.	Emma Lisson, Health and Safety Coordinator 11 July, 2025	Michael Zaborsky and Ovidiu Cotiga, Senior Management 18 August, 2025	Michael Zaborsky, President 02 September, 2025

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## 1 Purpose

Proper preventative maintenance is a vital part of Bestco Construction Ltd.'s safety program. All tools, equipment, vehicles and facilities must be adequately inspected, maintained, and kept in good working condition by qualified maintenance personnel. The preventative maintenance program will reduce the risk of injury, damage, and lost production due to defective tools, equipment, and vehicles by conducting scheduled inspections and recording all maintenance work.

## 2 Scope

The Preventative Maintenance policy and procedure applies to all work or work-related activities performed and equipment under the control of the organization by workplace parties. The inventory of equipment requiring to be maintained includes all owned, leased and rented equipment.

## 3 Definitions

**Commercial Motor Vehicle: is,**

- a truck or highway tractor with a gross weight or registered gross weight of more than 4,500 kilograms (kg) or
- a bus with a seating capacity for ten or more passengers

[MTO Guidelines]


**Competency:** A person performing a task for, or on behalf of, the organization is competent to do so by means of appropriate:

- a) Knowledge of the hazards and risks associated with the tasks for the operations and activities.
- b) Demonstrated understanding and working knowledge of the control measures associated with the hazards and risks.
- c) Training regarding the hazards, risks, and associated control measures d) Aptitudes, such as skillset, ability, and willingness to deal with the hazards, risks, and control measure.

[Ref. COR 2020 Audit Handbook].

**Competent Person:** A person who,

- a) is qualified because of knowledge, training, and experience to organize the work and its performance,
- b) is familiar with this Act and the regulations that apply to the work, and

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- c) has knowledge of any potential or actual danger to health or safety in the workplace.

[Ref. OHSA].

**Competent Worker:** In relation to specific work, means a worker who,

- a) is qualified because of knowledge, training, and experience to perform the work,
- b) is familiar with the Occupational Health and Safety Act and with the provisions of the regulations that apply to the work, and
- c) has knowledge of all potential or actual danger to health or safety in the work.

[Ref. O. Reg. 213/91: Construction Projects under OHSA].

**Compliance:** Meeting all requirements outlined within applicable legislation and regulations. [Ref. COR 2020 Audit Handbook].

**Conformity:** Fulfillment of a requirement. [Ref. COR 2020 Audit Handbook].

**Contractor:** A person or organization providing services to another organization in accordance with agreed upon specification, terms, and conditions.  
[Ref. COR 2020 Audit Handbook].

- A subcontractor is a person or organization that takes a portion of a contract from the principal contractor or another subcontractor

**Corrective Action:** Action to eliminate the cause of a non-conformity and to prevent recurrence. There can be more than one cause for a non-conformity. Document: Medium containing information related to the OHSMS. [Ref. COR 2020 Audit Handbook].

**Document:** Medium containing information related to the OHSMS.


**Hazard:** Source, situation, or act with a potential for harm in terms of human injury. [Ref. COR 2020 Audit Handbook].

**Interested Parties:** Persons or groups, inside or outside the workplace, concerned with or affected by OHS performance of an organization. [Ref. COR 2020 Audit Handbook].

**Legal Requirements:** All applicable legislation, including but not limited to the Occupational Health and Safety Act and its regulations.

**Non-conformity:** Non-fulfillment of a requirement [Ref. COR 2020 Audit Handbook].



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**Occupational Health and Safety (OHS):** Conditions and factors that affect or could affect the health and safety of employees or other workers, inclusive of temporary workers and contractor personnel, visitors, suppliers, vendors, or any other person in the workplace. [Ref. COR 2020 Audit Handbook].

**Occupational Health and Safety Management System (OHSMS):** As defined in the OHSA “means a coordinated system of procedures, processes and other measures that is designed to be implemented by employers to promote continuous improvement in occupational health and safety. [Ref. COR 2020 Audit Handbook].

**Organization:** Company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public, or private, that has its own functions, management, and administration. [Ref. COR 2020 Audit Handbook].

**Other Requirements:** Requirements or provisions the organization subscribes, however are not legally binding, such as industry standards. [Ref. COR 2020 Audit Handbook].


**Policy:** A policy is a general commitment, direction or intention and is formally stated by top management. A quality policy statement should express top management's commitment to the implementation and improvement of its management system. [Ref. COR 2020 Audit Handbook].

**Preventative Action:** Action to eliminate the cause of potential non-conformity or other potential undesirable potential situation. There can be more than one cause for a potential nonconformity. (For the purposes of this Standard, this refers to any action taken to fix a potential OHS problem.) [Ref. COR 2020 Audit Handbook].

**Procedure:** A documented, specified method to carry out an activity. **Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].

**Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].

**Project:** a construction project, whether public or private, including,  
a) the construction of a building, bridge, structure, industrial establishment, mining plant, shaft, tunnel, caisson, trench, excavation, highway, railway, street, runway, parking lot, cofferdam, conduit, sewer, watermain, service connection, telegraph, telephone or electrical cable, pipe line, duct or well, or any combination thereof,

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- b) the moving of a building or structure, and
- c) any work or undertaking, or any lands or appurtenances used in connection with construction.

[Ref. OHSA].

**Record:** Document stating results achieved or providing evidence of activities performed.  
[Ref. COR 2020 Audit Handbook].

**Supplier:** A person who supplies any machine, device, tool, or equipment under any rental, leasing, or similar arrangement for use in or about a workplace. [Ref. OHSA].

**Workplace:** any land, premises, location, or thing at, upon, in or near which a worker works. [Ref. OHSA].

**Workplace Parties:** Includes, but is not limited to, the employer, supervisor(s), workers, constructor, visitors, and owner. [Ref. COR 2020 Audit Handbook].

## 4 Procedure


Bestco Construction Ltd.'s preventative maintenance program is a systematic approach to predict and prevent tools, equipment, vehicle, and facility failure proactively. It includes maintaining and following a schedule for routine maintenance based on manufacturer's guidelines using appropriate checklists and work orders and also monitoring and recording corrective actions. The preventative maintenance program will reduce the risk of injury, damage, and lost production through the following steps:

### 4.1. Inventory of Tools, Equipment, Facilities and Vehicles

An inventory list of tools, equipment, facilities, and vehicles, including those that are owned, leased, or rented, will be developed and maintained as part of the preventative maintenance program. **Preventative Maintenance Schedule** will be maintained by the health and safety coordinator. The items included on the list are those that require scheduled maintenance, servicing, adjusting, or replacing of components as prescribed in the equipment's manufacturers' guidelines and legislated requirements. The inventory list may include, but is not limited to tools, equipment, and vehicles that require maintenance.

All tools, equipment, and vehicles must be inspected and maintained in accordance with the following:

- The manufacturers' instructions.

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- Industry standards; and/or
- Legislative requirements.

Manufacturers' instructions should be available for the tools, equipment, facilities, and vehicles and shall be reviewed by all maintenance personnel. All equipment will be inspected and maintained by competent personnel. For vehicles, machines, tools, and equipment rated at greater than 10 horsepower, copies of any operating manual issued by the manufacturers shall be kept readily available at the job sites.

#### **4.2. Preparation of Maintenance Schedules**

The preventative maintenance schedules shall be developed by the health and safety coordinator based on the following:

- The manufacturers' instructions
- Industry standards
- Legislative requirements


The maintenance schedule shall be shared by the health and safety coordinator to affected workplace parties to schedule and track operations and maintenance activities.

In addition to the promulgated maintenance schedule, the preventative maintenance program will also address defective tools, equipment, facilities, and vehicles that are reported as part of operations.

#### **4.3. Qualifications/Training of Maintenance Personnel**

All individuals who perform inspection and maintenance work will have the appropriate skills, accreditation, and/or certification before undertaking any maintenance work. For 3<sup>rd</sup> party maintenance personnel, the Bestco Construction Ltd. should ensure that the service provider/company has the appropriate skills, training, and valid certifications. The approval process to establish qualified maintenance personnel includes the following:

1. Possession of a valid driver's license, operator's certification, or adequate training appropriate to the type of equipment.
2. Successful completion of a practical operating exam and demonstration of skills test administered by competent and authorized personnel.
3. Training in the following:
  - a. responsibilities to operate the equipment in a safe manner.

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- b. familiarity and comprehension of safety requirements for the piece of equipment which they will operate.
- c. manufacturer's operating and maintenance procedures.
- d. how to communicate to maintenance personnel when there is a problem with a specific piece of equipment.
- e. hand signals and/or other requirements as set by the company or owner, or as dictated by site conditions.
- f.

#### **4.4. Monitoring Equipment**

The monitoring equipment in the preventative maintenance program fall into two areas.

- a. The worker responsible for operating, inspecting and/or maintaining equipment must monitor their equipment to ensure that appropriate checks and maintenance are done.
- b. Management should monitor the entire program to ensure that it is functioning in accordance with company policy.


The worker responsible for operating equipment must perform at minimum an annual inspection or more as frequently recommended by the manufacturer of the vehicle, facilities, tools, or equipment before they are first used at the project. Maintenance of equipment, release of lubrication fluids, etc., is performed only in approved areas. Spills and leaks from equipment are cleaned up promptly.

The frequency of inspections must adhere to the manufacturer's recommendations, industry standards and legislative requirements. The manufacturer's guidelines must be readily available and integrated into all checklists for all items in the inventory. Inspection checklists are specific to the equipment used to assist with ensuring maintenance is performed as required.

All facilities, tools, equipment, and vehicles must have their own inspection checklist. Before the Supervisor transfers or assigns equipment into the control of other authorized person(s), they must ensure the equipment is in good working order according to the manufacturer's operations and maintenance guidelines.

#### **4.5. Performing Maintenance**

Bestco Construction Ltd. shall use in house and/or outsourced maintenance to carry out preventative maintenance for all tools, equipment, facilities, and vehicles.

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- Preventative maintenance activities shall be conducted in accordance with established preventative maintenance schedules aligned with corresponding manufacturers' guidelines.
- The maintenance activities will be conducted by qualified personnel.
- Once maintenance is completed, the equipment will be checked for safe operation and the appropriate form will be completed to document the maintenance performed.
- If the maintenance is completed by a qualified 3rd party, the maintenance record and/or invoice shall be collected and stored in the designated area. The equipment will be put back into service and documentation shall be retained.

#### 4.6. Legislative Requirement

As per O.Reg.213/91 Construction Projects Regulation,

- All vehicles, machinery, tools, and equipment shall be maintained in a condition that does not endanger a worker.
- No vehicle, machine, tool, or equipment shall be used,
  - a) while it is defective or hazardous;
  - b) when the weather or other conditions are such that its use is likely to endanger a worker; or
  - c) while it is being repaired or serviced, unless the repair or servicing requires that it be operated.
- All vehicles, machines, tools, and equipment shall be used in accordance with any operating manuals issued by the manufacturers.
- For vehicles, machines, tools, and equipment rated at greater than 10 horsepower, copies of any operating manuals issued by the manufacturers shall be kept readily available at the project.
- All mechanically powered vehicles, machines, tools and equipment rated at greater than 10 horsepower shall be inspected by a competent worker to determine whether they can handle their rated capacity and to identify any defects or hazardous conditions.
- The inspections shall be performed before the vehicles, machines, tools, or equipment are first used at the project and thereafter at least once a year or more frequently as recommended by the manufacturer.

**Please note that the above legislated requirement shall be superseded by manufacturers guidelines if the manufacturer's requirement is stringent.**

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#### 4.7. Commercial Motor Vehicle Annual Inspection

Commercial motor Vehicle Annual inspections - Truck, Mobile Equipment Vehicle, Trailer, and Converter Dolly

- Annual inspection must be completed as per the requirements in National Safety Code 11, Part B, Periodic Commercial Motor Vehicle Inspections (NSC 11B) and HTA Regulation 611 (Safety Inspections) under Highway Traffic Act.
- A yellow annual inspection sticker is applied to the lower left-hand side of the windshield, or a conspicuous position on the left side of the truck cab, indicating the month and year the inspection was completed.
- All previous inspection stickers are covered or removed.
- The inspection is valid for 12 months.
- Motor Vehicle Inspection Station (MVIS) licensee must provide the owner/operator with a copy of the annual inspection certificate and the annual inspection report

#### 4.8. Identifying and Removing Defective/Overdue Equipment from Service


The following procedures should be followed when removing equipment from service:

(a) DEFECTIVE tools, equipment, and vehicles

- Power down tools, equipment and vehicles and move the item to be decommissioned to a safe location, if possible.
- Apply a "Do Not Use" tag in a conspicuous location (such as near ignition, start button, pull cord, etc.). The tag should include the name of the worker, the date and time, and the nature of the defect.
- Where applicable, remove keys, disconnect power sources, or otherwise secure the equipment from being used.
- Notify your immediate supervisor.
- Supervisor must ensure all workers that may use the equipment are notified of the situation.

(b) OVERDUE service of tools, equipment, and vehicles

- Tools, equipment, and vehicles that are found to be overdue for service shall be reported to the supervisor.

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- If the tool, equipment, or vehicle that is overdue for service affects the safe operation or poses a hazard to workers the item must be decommissioned until such service can be performed and the equipment returned to safe operating status.
- Apply a 'Do Not Use' tag in a conspicuous location (such as near ignition, start button, pull cord, etc.) including your name, the date and time, and state the piece of equipment is overdue for maintenance.
- Supervisor must notify the in-house or third-party maintenance provider.

#### 4.9. Document and Record Control

The Designated Maintenance Person will maintain records of all inspections, maintenance and corrective actions and shall store them in the office. These records will be presented to relevant workplace parties/senior management when requested.

## 5 Roles and Responsibilities

Responsibilities and accountabilities of workplace parties ensures a commitment by workplace parties ensuring a safe and healthy work environment. The responsibilities of workplace parties are outlined as per the Organization Chart and listed below with the specific roles within the organization.


### 5.1. Senior Management

- Ensure the establishment and implementation of the preventative maintenance program.
- Allocate resources necessary for the preventative maintenance program.
- Review trends and performance of the preventative maintenance program periodically and, at a minimum, during the management review process.

### 5.2. Supervisors

- Maintain an inventory of owned, leased and rented equipment (for the projects they oversee) requiring preventative maintenance.
- Ensure all preventative maintenance activities are conducted according to schedule for the duration of the project.
- Ensure equipment is inspected, operated, and maintained by a competent person.



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- Follow-up on corrective actions for equipment in need of maintenance work; ensure corrective actions are documented.
- Ensure tagging and removal from service of overdue and/or defective tools, equipment, facilities, and vehicles. Inform the Designated Maintenance Person of all equipment removed from service.

### 5.3. Designated Maintenance Person/Department

- Develop an inventory of owned, leased and rented equipment requiring preventative maintenance for the organization.
- Develop preventative maintenance inspection checklists for all equipment requiring preventative maintenance.
- Ensure the preventative maintenance of all tools, equipment, facilities, and vehicles (either through in-house resources or third party) is completed as per the frequencies outlined for each piece of equipment, aligned with the manufacturer's requirements.
- Document any deficiencies found and submit the checklist to their supervisor.

### 5.4. Trained In-House Maintenance Worker


- Ensure that their training and certification for maintenance of tools, equipment, facilities, and vehicles is valid.
- Undertake preventative maintenance of assigned tools, equipment, facilities, and vehicles as per the manufacturer's guidelines.
- Document the completion of maintenance activities in the service logs or manuals.
- In case of deficiencies (if any), inform the supervisor and the Designated Maintenance Person.

### 5.5. Workers /Equipment Operator

- Do not use defective equipment.
- Identify overdue and/or defective tools, equipment, facilities, and vehicles observed in the workplace and/or through workplace inspections.
- Inform supervisor of any overdue and/or defective tools, equipment, facilities, and vehicles.

## 6 Related Documents/ Forms



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- BESTCO-PRO-01.2-Document and Record Control Procedure
- BESTCO-PLY-07.0- Preventative Maintenance Policy
- BESTCO-PRO-09.0-Workplace Inspection Procedure.
- Equipment Inventory
- Preventive Maintenance Schedule
- Equipment Manufacturer's Guidelines
- Equipment Maintenance Checklists
- Lockout/Tagging Procedure
- Work Order
- Equipment 3rd Party Maintenance Records
- Equipment Pre-Use Inspection Checklists
- Vehicle Inspection Form/Circle Check Form
- Training Records/Certificates

## 7 Document and Record Maintenance

Documents and Records are maintained as per **BESTCO-PRO-01.2-Document and Record Control Procedure**.


## 8 Record Retention

Records will be stored and tracked and will document what maintenance work was done, when, and by whom for scheduling of future maintenance.

Records are to be retained for a minimum of 3 years. Records will remain legible and readily identifiable.

## 9 Legislated/Other References

- Duties of employers – Occupational Health and Safety Act, s. 25, 26
- Duties of supervisors – Occupational Health and Safety Act, s. 27
- Duties of workers – Occupational Health and Safety Act, s. 28
- O. Reg. 213/91, Construction Projects Regulation, Equipment, General, s. 93-116
- Occupational Health and Safety Act, s. 23-28
- CSA Standards
- Equipment Manufacturer's Guidelines
- IHSA COR™ 2020 Guidelines

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## Training Policy

Bestco Construction Ltd. recognizes training and education of workplace parties as a vital part of our health and safety program. We are committed to ensuring that all workplace parties have the necessary instruction and training to perform their work safely. The requirements for training are established using a systematic training needs analysis to determine the required health and safety information that is provided to each specific workplace party. Our workers shall have the knowledge and skills to do their work in a safe manner. Safety instructions will be provided to all workers who are required to comply with these instructions.

Training aids in the development and maintenance of job specific knowledge and skills needed to work safely and efficiently. Workers of Bestco Construction Ltd. will receive orientation training prior to starting their job. The new worker orientation will be used to review general and specific health and safety requirements as required by our program and regulations. Site specific orientations will be provided prior entering a project site.

Senior Management is committed to providing the necessary budget, time, and resource for establishing and maintaining the training program.

The program and its performance shall be reviewed annually for sustainability, adequacy, and effectiveness.




Name: Michael Zaborsky

Title: President

Company: Bestco Construction (2005) Ltd.


Sept. 2, 2025

Date: 02 September, 2025

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# Training Procedure

<b>Version No.</b>	<b>Reason for Revision:</b>	<b>Developed By and Date:</b>	<b>Reviewed By and Date:</b>	<b>Approved By and Date:</b>
1	To meet COR 2020 Standards, company's health and safety processes and Ontario's Health and Safety Legislative Requirements.	Emma Lisson, Health and Safety Coordinator 11 July, 2025	Michael Zaborsky and Ovidiu Cotiga, Senior Management 18 August, 2025	Michael Zaborsky, President 02 September, 2025

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## 1 Purpose

This procedure is to establish and outline the training program at Bestco Construction Ltd. using a systematic training needs analysis to determine the required health and safety information that is provided to each specific workplace party. This procedure ensures that systems are in place for the effective delivery of all training programs including compliance-based training that meets provincial legislative requirements.

## 2 Scope

This Training Program applies to all work or work-related activities performed under the control of the organisation by all workplace parties.

## 3 Definitions

**Competency:** A person performing a task for, or on behalf of, the organization is competent to do so by means of appropriate:

- Knowledge of the hazards and risks associated with the tasks for the operations and activities.
- Demonstrated understanding and working knowledge of the control measures associated with the hazards and risks.
- Training regarding the hazards, risks, and associated control measures
- Aptitudes, such as skillset, ability, and willingness to deal with the hazards, risks, and control measure.

[Ref. COR 2020 Audit Handbook].

**Competent Person:** A person who,


- is qualified because of knowledge, training, and experience to organize the work and its performance,
- is familiar with this Act and the regulations that apply to the work, and
- has knowledge of any potential or actual danger to health or safety in the workplace.

[Ref. OHSA].

**Competent Worker:** In relation to specific work, means a worker who,

- is qualified because of knowledge, training, and experience to perform the work,
- is familiar with the Occupational Health and Safety Act and with the provisions of the regulations that apply to the work, and
- has knowledge of all potential or actual danger to health or safety in the work.

[Ref. O. Reg. 213/91: Construction Projects under OHSA].

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**Compliance:** Meeting all requirements outlined within applicable legislation and regulations. [Ref. COR 2020 Audit Handbook].

**Conformity:** Fulfillment of a requirement. [Ref. COR 2020 Audit Handbook].

**Contractor:** A person or organization providing services to another organization in accordance with agreed upon specification, terms, and conditions. [Ref. COR 2020 Audit Handbook].

- A subcontractor is a person or organization that takes a portion of a contract from the principal contractor or another subcontractor

**Document:** Medium containing information related to the OHSMS. [Ref. COR 2020 Audit Handbook].

**Employer:** A person who employs one or more workers or contracts for the services of one or more workers and includes a contractor or subcontractor who performs work or supplies services and a contractor or subcontractor who undertakes with an owner, constructor, contractor, or subcontractor to perform work or supply services [Ref. OHSA].

**Hazard:** Source, situation, or act with a potential for harm in terms of human injury. [Ref. COR 2020 Audit Handbook].

**Interested Parties:** Persons or groups, inside or outside the workplace, concerned with or affected by OHS performance of an organization. [Ref. COR 2020 Audit Handbook].


**Legal Requirements:** All applicable legislation, including but not limited to the Occupational Health and Safety Act and its regulations. [Ref. COR 2020 Audit Handbook].

**Management:** People who have care and control over people and/or processes [Ref. COR 2020 Audit Handbook].

- **Middle Management (Project Manager, Office Manager, etc.):** A group of managers who administers and/or supervises the affairs of a department or division at the level below senior management of the company or organization.

**Non-conformity:** Non-fulfillment of a requirement [Ref. COR 2020 Audit Handbook].

**Occupational Health and Safety (OHS):** Conditions and factors that affect or could affect the health and safety of employees or other workers, inclusive of temporary workers and

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contractor personnel, visitors, suppliers, vendors, or any other person in the workplace. [Ref. COR 2020 Audit Handbook].

**Occupational Health and Safety Management System (OHSMS):** As defined in the OHSA “means a coordinated system of procedures, processes and other measures that is designed to be implemented by employers to promote continuous improvement in occupational health and safety. [Ref. COR 2020 Audit Handbook].

**Other Requirements:** Requirements or provisions the organization subscribes, however are not legally binding, such as industry standards. [Ref. COR 2020 Audit Handbook].

**Policy:** A policy is a general commitment, direction or intention and is formally stated by top management. A quality policy statement should express top management's commitment to the implementation and improvement of its management system. [Ref. COR 2020 Audit Handbook].

**Procedure:** A documented, specified method to carry out an activity. **Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].


**Project:** a construction project, whether public or private, including,

- a) the construction of a building, bridge, structure, industrial establishment, mining plant, shaft, tunnel, caisson, trench, excavation, highway, railway, street, runway, parking lot, cofferdam, conduit, sewer, watermain, service connection, telegraph, telephone or electrical cable, pipe line, duct or well, or any combination thereof,
- b) the moving of a building or structure, and
- c) any work or undertaking, or any lands or appurtenances used in connection with construction.

[Ref. OHSA].

**Record:** Document stating results achieved or providing evidence of activities performed. [Ref. COR 2020 Audit Handbook].

**Senior Management (Company President, Vice President of Operations) - Employer's Representative:** Person(s) at the highest level of an organization's structure responsible for leading, managing and /or directing an organization's day-to-day activities and/or operations. [Ref. COR 2020 Audit Handbook].

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**Supervisor:** A person who has charge of a workplace or authority over a worker [Ref. OHSA].

**Worker:** Any of the following, but does not include an inmate of a correctional institution or like institution or facility who participates inside the institution or facility in a work project or rehabilitation program,

- A person who performs work or supplies services for monetary compensation.
- A secondary school student who performs work or supplies services for no monetary compensation under a work experience program authorized by the school board that operates the school in which the student is enrolled.
- A person who performs work or supplies services for no monetary compensation under a program approved by a college of applied arts and technology, university, private career college or other post-secondary institution.
- Such other persons as may be prescribed who perform work or supply services to an employer for no monetary compensation.

[Ref. OHSA].

**Workplace:** any land, premises, location, or thing at, upon, in or near which a worker works. [Ref. OHSA].

**Workplace Parties:** Includes, but is not limited to, the employer, supervisor(s), workers, constructor, visitors, and owner. [Ref. COR 2020 Audit Handbook].


## 4 Procedure

Bestco Construction Ltd.'s Training Program includes:

- The roles and responsibilities of relevant workplace parties in the provision, facilitation, participation, and administration of training
- The orientation, health and safety training, and job specific training required by all new workplace parties including new and young workers, those returning from a long absence or those that have a change of role
- Information on Bestco Construction Ltd.'s Occupational Health and Safety Management System (OHSMS) such as purpose, roles, responsibilities and rights, importance of conformity, potential consequences for deviations or noncompliance and, the importance of all workplace parties' participation within the OHSMS.

Training needs are determined by conducting a **Training Needs Analysis**. **Training Needs Analysis** shall be conducted at least annually or sooner as needed. This includes:



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- Reviewing legislated requirements as well as any other relevant training requirements
- Competency requirements for each job title, position, and task
- Consideration of the targeted audience such as level of responsibility of the audience, abilities, language skills and literacy
- Feedback from operations and non-conformance issues related to the OHSMS
- Information on the organization's OHSMS including purpose, roles, responsibilities and rights, importance of conformity, potential consequences for deviations or noncompliance and importance of workers' participation within the OHSMS

#### 4.1. New Worker Orientation

Prior to start of employment, workers are required to complete Bestco Construction Ltd.'s worker health and safety orientation. New workers will be provided with the basic health and safety information and a tour of the physical work environment (if possible). The supervisor and the new worker will review the **New Employee Orientation Checklist** and identify and address the competencies required for task and role and any training needs.


An overview of the following topics shall be covered as part of the new worker orientation:

- Introduction to the company
- Facility Orientation
- Company Policies
- First Aid and Incident Reporting
- Emergency Response Plan
- Workplace Violence and Harassment
- Hazard Recognition and Assessment
- Safe Work Practices and Safe Job Procedures
- Competency review (will factor any previous certifications held by the worker)

Orientation records will be maintained at the main office..

#### 4.2. Site Orientation

Any worker coming to a site for the first time is considered a "new worker" and requires a site orientation. "New worker" also includes workers returning to the site after an extended absence and those that have changed roles. The supervisor is

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responsible for providing this orientation before the worker is allowed to start work. This will be done using the **Site Orientation Form**.

The orientation will include safety information specific to the site and on the expected duties the worker will perform. The orientation session could be conducted by, but not limited to, the site supervisor, health and safety coordinator, or worker's supervisor.

Bestco Construction Ltd.'s site specific orientation includes the following:

- The identification of worksite hazards and the controls for mitigating hazards
- How to report hazards, injuries, accidents, and near misses
- Information regarding current site-specific controls in use
- Basic and job-specific PPE that is required on site
- Emergency Response Plan.
- The location of safety reference materials including:
  - Written controls, procedures, Health and Safety Manual,
  - Safety Data Sheet (SDSs) and,
  - Legal and other requirement relevant to work location

Records are maintained at site level and transferred to the main office.

#### 4.3. Competency:


A person performing a task for, or on behalf of, the organization is competent to do so by means of appropriate:

- Knowledge of the hazards and risks associated with the tasks for the operations and activities
- Demonstrated understanding and working knowledge of the control measures associated with the hazards and risks
- Training with regard to the hazards, risks and associated control measures
- Aptitudes, such as skillset, ability, and willingness to deal with the hazards, risks, and control measures

Management will ensure that the competency is verified before workers are assigned to complete any task.

Please refer to the **Competency Requirement List**.

#### 4.4. Mandatory Health and Safety Training

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New workers will be required to take health and safety training as part of the Health and Safety Program. The following mandatory training courses must be completed by all workers as soon as practicable prior to commencing their job:

- Worker Health and Safety Awareness Training
- Supervisor Health and Safety Awareness Training (must be completed within one week of performing work as a supervisor, O. Reg 297/13, Section 2 (1))
- Workplace Hazardous Materials Information System (WHMIS-2015) training
- Workplace Violence and Harassment
- Accessibility for Ontarians with Disabilities Act (AODA) training

Workers will be accessing the training modules through the **4SafeCom™ Training Management System (4SafeCom™)**. Training records are required to be retained for a minimum period of 3 years and monitored by management.

#### 4.5. Job Specific Training

In addition to the mandatory training, workers may be required to take additional training (including hands-on training) to address training needs based upon the review of the task/role that they will be assigned. The requirement of additional training will be reviewed during the orientation.


Job specific training shall demonstrate understanding of the following:

- Hazards associated with the job and the controls in place to mitigate them
- Where to locate all necessary job specific health and safety information that is necessary to do the job safely

In addition to job specific training, supervisors will also be trained on the following:

- Workplace Inspection
- Accident Investigation
- Emergency Response

Workers will not be permitted to begin their job without reviewing the Job Hazard Analysis (JHAs), Safe Work Practices (SWPs), Safe Job Procedures (SJPs) or other applicable procedures pertaining to their job. Based on the worker's role at the organization and the tasks that they perform, the JHAs are assigned to workers and will be acknowledged by them. The SWPs and SJPs that apply to those tasks will also be assigned. The required SWP and SJP for each task are identified in the **JHA Procedure Matrix**.

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The records of these reviews will be maintained and monitored by management. Workers who are promoted/transferred will be required to take training based on the hazards that they are exposed to in their new role.

#### 4.6. Training Facilitation

Management will ensure that any internal or external training is provided by a competent person. Training credentials from other companies will only be approved after verification.

The following training will only be delivered by a training provider, approved by the Ministry of Labour, Immigration, Training and Skills Development (MLITSD), Ontario Chief Prevention Officer.

- Working at Heights training
- Joint Health and Safety Committee training
- First Aid


#### 4.7. Evaluation of Learning

Workers will be evaluated and assessed continuously on their understanding, retention, and application of the training provided. Mandatory effectiveness will be gauged through quizzes and tests after training. Any certification course will also require workers to successfully complete an exam immediately upon the conclusion of the course to test their knowledge. For all other training, the effectiveness will be evaluated using various means such as, but not limited to, informal supervisor observations, one-on-one coaching sessions, weekly/monthly worksite inspections (worker contacts) and unscheduled quizzes or surveys. Training effectiveness can also be made through employee feedback.

#### 4.8. Training Administration and Management

The management team will appoint an employee to administer and manage the training program. This person will ensure all workers that are assigned training will have their records maintained and be provided the opportunity to give feedback that will be collected and reviewed. Records identifying the annual completion of the training needs analysis will be retained along with any changes made to the training matrix due to the feedback collected by workers, changes in competency requirements etc.

## 5 Roles and Responsibilities

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Responsibilities and accountabilities of workplace parties ensures a commitment by workplace parties ensuring a safe and healthy work environment. The responsibilities of workplace parties are outlined as per the Organization Chart and listed below with the specific roles within the organization. Responsibilities are listed below with the specific roles within the organization.

### 5.1. Senior Management


- Allocate resources for developing, procuring, delivering training programs for all workplace parties, including appointing person(s) to administer and manage this policy and procedure.
- Ensure training needs analysis is conducted to identify the competencies required for each task/role and to determine the OHS training needs for the organization.
- Appoint competent person to conduct the in-house training.
- Appoint an administrator to maintain and administer training program, and related documents and records.
- Ensure an orientation program is in place to provide training prior to the worker starting work or a relevant task.
- Take workers' feedback and concerns and update training programs if necessary.
- Maintain the credentials of the trainers and maintain training and orientation records.
- Ensure a process is in place to evaluate learning.

### 5.2. Health and Safety Coordinator

- Administer and manage the training program.
- Maintain training related documents and records.
- Coordinate training programs, if applicable
- Maintain "Training Matrix" and follow up with outstanding or expired trainings.

### 5.3. Managers/Supervisors

- Aid upon request with the administration and management of this policy and procedure.
- Provide support with the training needs analysis upon request.
- Conduct orientation training prior to a worker starting work or being assigned a new task.
- Complete site orientation for a worker prior to starting work on the site.

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- Assign tasks to workers only after ensuring that appropriate training is provided.
- Take into consideration the abilities, language skills and literacy of the workers when delivering training and act upon any gaps in the ability to learn if necessary.
- Ongoing coaching and monitoring of workers and continuously assessing/evaluating workers knowledge and competency to determine when refresher training is warranted.
- Take workers' feedback and concerns and respond or act, as necessary.
- Maintain training and orientation records as required.


#### 5.4. Workers

- Complete orientation and job specific training and task reviews before starting the job.
- Complete mandatory training as required.
- Provide feedback on training conducted to your supervisor(s).
- Identify new training if applicable and provide feedback to your supervisor(s).
- Participate in the learning evaluation process and maintenance of records upon request.

## 6 Related Documents/Forms

- BESTCO-PRO-01.2-Document and Record Control Procedure.
- BESTCO-PLY-08.1-Training Policy
- New Employee Orientation Checklist
- Site Orientation Form
- Training Records/Certificates
- Training Matrix
- JHA Procedure Matrix
- Training Needs Analysis
- Competency Requirement List
- 4SafeCom™ Reference Documents
- 4SafeCom™ Training Management
- 4SafeCom™ My Training

## 7 Document and Record Maintenance

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Documents and Records are maintained as per **BESTCO-PRO-01.2-Document and Record Control Procedure**.


## 8 Record Retention

Records are to be retained for a minimum of 3 years. Records will remain legible and readily identifiable.

## 9 Legislated/Other References

- Duties of constructors – Occupational Health and Safety Act, s. 23
- Duties of employers – Occupational Health and Safety Act, s. 25, 26
- Duties of supervisors – Occupational Health and Safety Act, s. 27
- Duties of workers – Occupational Health and Safety Act, s. 28
- Joint Health and Safety Committee – Occupational Health and Safety Act, s. 9
- O.Reg. 297/13: Occupational Health and Safety Awareness and Training Regulation under the Occupational Health and Safety Act
- O.Reg. 213/91: Construction Projects under the Occupational Health and Safety Act
- O.Reg. 851: Industrial Establishments under the Occupational Health and Safety Act
- O.Reg. 860: Workplace Hazardous Materials Information System (WHMIS) under the Occupational Health and Safety Act
- Accessibility for Ontarians with Disabilities Act, 2005
- Applicable training standards pertaining to equipment operation
- IHSA COR™ 2020 Guidelines



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## Communication Policy

Bestco Construction Ltd. recognizes communication between workplace parties is a vital part of our health and safety program. Good communication is important for all workplace parties to stay current and address any issues that may arise quickly and effectively. All workplace parties need to know their roles and responsibilities to ensure a safe work environment, as well as understand what and how Bestco Construction Ltd. will communicate effectively across the organization.

Senior Management is committed to providing regular opportunities for workers to receive current and new health and safety information and provide them a platform to speak freely and provide feedback or ask questions continuously.

We will hold an organizational-wide Occupational Health & Safety Meeting annually, to promote and emphasize the importance of an Occupational Health & Safety Management System (OHSMS) at Bestco Construction Ltd. We will ensure that communication is delivered in a manner that is understood by the worker and considers ability, language skills and literacy to ensure effective communication to all workplace parties.

Bestco Construction Ltd. will ensure that clear channels of communication are established between all workplace parties. These channels will ensure that relevant OHS communication is exchanged between all workplace parties. Records of communication are to be retained.

Senior Management is committed to providing the necessary budget, time, and resource for establishing and maintaining the program.

The program and its performance shall be reviewed annually for sustainability, adequacy, and effectiveness.



Name: Michael Zaborsky


Title: President

Company: Bestco Construction (2005) Ltd.

Sept. 2, 2025


Date: 02 September, 2025



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# Communication Procedure

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1	To meet COR 2020 Standards, company's health and safety processes and Ontario's Health and Safety Legislative Requirements.	Emma Lisson, Health and Safety Coordinator 11 July, 2025	Michael Zaborsky and Ovidiu Cotiga, Senior Management 18 August, 2025	Michael Zaborsky, President 02 September, 2025

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## 1 Purpose

Communication is key to a safe and healthy workplace. The purpose of this procedure is to outline the Communication Program at Bestco Construction Ltd. We are committed to ensuring that all workers have the necessary instruction and information to ensure they perform their work safely. This procedure outlines the various communication channels used by Bestco Construction Ltd. to facilitate open dialogue across the organization and to ensure that two-way communication exists among management, supervisors, and workers.

## 2 Scope

This Communication Procedure applies to all work or work-related activities performed under the control of the organization by all workplace parties.

## 3 Definitions

**Competency:** A person performing a task for, or on behalf of, the organization is competent to do so by means of appropriate:

- Knowledge of the hazards and risks associated with the tasks for the operations and activities.
- Demonstrated understanding and working knowledge of the control measures associated with the hazards and risks.
- Training regarding the hazards, risks, and associated control measures d)
- Aptitudes, such as skillset, ability, and willingness to deal with the hazards, risks, and control measure.

[Ref. COR 2020 Audit Handbook].


**Competent Person:** A person who,

- is qualified because of knowledge, training, and experience to organize the work and its performance,
- is familiar with this Act and the regulations that apply to the work, and
- has knowledge of any potential or actual danger to health or safety in the workplace.

[Ref. OHSA].

**Competent Worker:** In relation to specific work, means a worker who,

- is qualified because of knowledge, training, and experience to perform the work,
- is familiar with the Occupational Health and Safety Act and with the provisions of the regulations that apply to the work, and

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c) has knowledge of all potential or actual danger to health or safety in the work.  
[Ref. O. Reg. 213/91: Construction Projects under OHSA].

**Document:** Medium containing information related to the OHSMS. [Ref. COR 2020 Audit Handbook].

**Hazard:** Source, situation, or act with a potential for harm in terms of human injury. [Ref. COR 2020 Audit Handbook].

**Interested Parties:** Persons or groups, inside or outside the workplace, concerned with or affected by OHS performance of an organization. [Ref. COR 2020 Audit Handbook].

**Legal Requirements:** All applicable legislation, including but not limited to the Occupational Health and Safety Act and its regulations.

**Occupational Health and Safety (OHS):** Conditions and factors that affect or could affect the health and safety of employees or other workers, inclusive of temporary workers and contractor personnel, visitors, suppliers, vendors, or any other person in the workplace. [Ref. COR 2020 Audit Handbook].


**Occupational Health and Safety Management System (OHSMS):** As defined in the OHSA “means a coordinated system of procedures, processes and other measures that is designed to be implemented by employers to promote continuous improvement in occupational health and safety. [Ref. COR 2020 Audit Handbook].

**Organization:** Company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public, or private, that has its own functions, management, and administration. [Ref. COR 2020 Audit Handbook].

**Policy:** A policy is a general commitment, direction or intention and is formally stated by top management. A quality policy statement should express top management's commitment to the implementation and improvement of its management system. [Ref. COR 2020 Audit Handbook].

**Procedure:** A documented, specified method to carry out an activity. **Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].

**Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].

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**Record:** Document stating results achieved or providing evidence of activities performed. [Ref. COR 2020 Audit Handbook].

**Senior Management (Company President, Vice President of Operations):** Person(s) at the highest level of an organization's structure responsible for leading, managing and /or directing an organization's day-to-day activities and/or operations. [Ref. COR 2020 Audit Handbook].

**Worker:** Any of the following, but does not include an inmate of a correctional institution or like institution or facility who participates inside the institution or facility in a work project or rehabilitation program,

- A person who performs work or supplies services for monetary compensation.
- A secondary school student who performs work or supplies services for no monetary compensation under a work experience program authorized by the school board that operates the school in which the student is enrolled.
- A person who performs work or supplies services for no monetary compensation under a program approved by a college of applied arts and technology, university, private career college or other post-secondary institution.
- REPEALED:
- Such other persons as may be prescribed who perform work or supply services to an employer for no monetary compensation

**Workplace:** any land, premises, location, or thing at, upon, in or near which a worker works. [Ref. OHSA].


**Workplace Parties:** Includes, but is not limited to, the employer, supervisor(s), workers, constructor, visitors, and owner. [Ref. COR 2020 Audit Handbook].

## 4 Procedure

Bestco Construction Ltd.'s Communication Program includes:

- The roles and responsibilities of relevant workplace parties in delivering communication
- A process for communicating health and safety information
- The required company-wide health and safety meetings to be held by senior management
- A process for maintaining communication records

### 4.1. Weekly Toolbox Talk

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Site supervisors will conduct weekly toolbox talks with their workers. Each worker will acknowledge that they have understood the topics discussed. The topic and the worker's signatures will be documented using the **Toolbox Talk Form**.

#### 4.2. Annual Health and Safety Meeting

Senior Management will coordinate a company-wide health and safety meeting annually. The **Meeting Agenda** will be provided in advance to all workers. Health and safety objectives of the year and an action plan will be communicated to workers that includes an update on the OHSMS and its implementation. Workers are encouraged to provide their feedback and raise any concerns to ensure two-way communication. The **Meeting Minutes** will be posted on the health and safety board. Action plans will be updated based on the discussion with workers, if required. Attendance of the meeting will be recorded in **Sign-In Sheet**.

Input from workers will be collected from Q&A session during the annual meeting and through a survey.


#### 4.3. Communication Methods and Delivery

The overall communication program will be managed by the health and safety coordinator with the support of site superintendents, and site supervisors. The manner of delivering communication as well as the content of the message will take into consideration the receiver's ability to understand the message including literacy and language skills. Communication will be appropriate for the audience.


#### 4.4. Management of Communication from Internal Parties

Internal communications are essential for the effective operation of the OHSMS. Informing all interested parties of information regarding the OHSMS allows for transparency between workplace parties regarding matters of health and safety and is crucial to keep workers informed of the hazards and controls in their workplace.

The table below outlines areas of the OHSMS at Bestco Construction Ltd. which are to be internally communicated to staff at various levels of the organization.

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What is to be communicated	When is it to be communicated	Who is it communicated to	How is it to be communicated	Documentation Required
Changes to any H&S processes	On occurrence of changes	All personnel at the facility	General Manager Annual Safety Meetings	Agenda/Script of annual safety meeting
			Toolbox Talk	Hardcopy of Agenda or email with Toolbox talk and recipients
Emergency responses/incidents at Bestco Construction Ltd.	Within 1 week of occurrence	All personnel	Safety Alert/Memo	Written Report on board
			Toolbox Talk	Hardcopy of Agenda
Critical Injuries	Post-occurrence, after completed investigation	All levels of Bestco Construction Ltd.	Annual Safety Meetings Safety Alert/Memo Toolbox Talk	Agenda/Script of annual meeting and toolbox talks
Injuries/safety incidents	Pre-shift	Workers on shift	Pre-shift toolbox talk led by supervisor	Toolbox talk form
			Toolbox talk	Hardcopy of Agenda
Changes to equipment/guarding/new or modified controls	Pre-shift	Workers on shift	Pre-shift toolbox talk led by supervisor	Toolbox talk form
			Toolbox talk	Hardcopy of Agenda
			Toolbox talk	Hardcopy of Agenda
Provincial inspector orders	Immediately on issuance of orders	All workplace parties	Health and Safety Board	Copy of Orders

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What is to be communicated	When is it to be communicated	Who is it communicated to	How is it to be communicated	Documentation Required
HSE documentation (Job Hazard Assessments, H&S manual, Procedures etc.)	Immediately upon completion and approval of documentation	Relevant workers based on job function and type of document	Digitally Paper based Internal Training	Digital records Paper Copies Internal Training records
Minutes of JHSC meetings (when applicable)	Immediately (upon completion and approval of minutes)	All workplace parties	Health and Safety Board	Copy of JHSC minutes

#### 4.5. Management of Communication from External Parties

Any communication between Bestco Construction Ltd. and external parties (includes but not limited to regulatory and enforcement provincial authorities, clients, vendors, and media), will be managed directly by senior management or by a person to whom such duties are delegated. Prior to reporting to any provincial authority, management will be consulted before submitting any verbal or formal written response to any requests. Communication with the media will be done only with the approval of the senior management. Any requests for interviews or comments from the media on a sensitive occupational health and safety matter must be forwarded to senior management immediately. All communication correspondence with external parties will be documented.


## 5 Roles and Responsibilities

Responsibilities and accountabilities of workplace parties ensures a commitment by workplace parties ensuring a safe and healthy work environment. The responsibilities of workplace parties are outlined as per the Organization Chart and listed below with the specific roles within the organization.

### 5.1. Senior Management

- Conduct annual safety meeting with all workers.
- Take workers' feedback and concerns and update the OHSMS and annual action plan if necessary.



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- Allocate resources and address barriers that could exist that may impact the ability to effectively communicate.
- Ensure sufficient channels of communication are available between workplace parties that include but not limited to, toolbox talks, tailgate talks, town halls, safety boards, posters, workshops, meetings.
- Assign and instruct personnel on how to receive, document and respond to internal and external communications that relate to Occupational Health & Safety.
- Ensure measures and procedures are in place to properly record attendance, agendas, meeting minutes and toolbox talks.

## 5.2. Supervisors


- Participate in annual safety meetings.
- Conduct and document weekly toolbox talks and request, receive and document worker feedback.
- Maintain two-way communication with workers and give a platform that allows them the opportunity to provide input without reprisal.
- Ensure prompt notification when there are changes in the workplace and OHSMS.
- Ensure communication is delivered in a manner that is understood by the receiver of the message and takes into consideration their ability, language skills and literacy.
- Adhere to communication protocols and processes for internal and external communications.
- Record attendance and meeting minutes.

## 5.3. Workers

- Participate in annual safety meetings.
- Actively participate in toolbox talks and in OHS meetings and provide feedback
- Provide feedback when current methods of communication are ineffective or when barriers are in place.
- Adhere to all external communication protocols
- Comply with attendance recording requirements

# 6 Related Documents/Forms

- Toolbox talk

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- Meeting Agenda
- Meeting Minutes
- Sign-In Sheets
- Surveys
- Safety Board postings
- 4SafeCom™ Reference Documents

## 7 Document and Record Maintenance


Documents and Records are maintained as per **BESTCO-PRO-01.2-Document and Record Control Procedure**.

## 8 Record Retention

Records are to be retained for a minimum of 3 years. Records will remain legible and readily identifiable.


## 9 Legislated/Other References

- Duties of employers – Occupational Health and Safety Act, s. 25, 26
- Duties of supervisors – Occupational Health and Safety Act, s. 27
- Duties of workers – Occupational Health and Safety Act, s. 28
- Health and Safety Representative – Occupational Health and Safety Act, s. 8
- Joint Health and Safety Committee – Occupational Health and Safety Act, s. 9
- IHSA COR™ 2020 Guidelines

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# Workplace Inspection Procedure

<b>Version No.</b>	<b>Reason for Revision:</b>	<b>Developed By and Date:</b>	<b>Reviewed By and Date:</b>	<b>Approved By and Date:</b>
1	To meet COR 2020 Standards, company's health and safety processes and Ontario's Health and Safety Legislative Requirements.	Emma Lisson, Health and Safety Coordinator 11 July, 2025	Michael Zaborsky and Ovidiu Cotiga, Senior Management 18 August, 2025	Michael Zaborsky, President 02 September, 2025

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## 1 Purpose

The purpose of this procedure is to outline the workplace and pre-use inspection requirements at Bestco Construction Ltd. Performing inspections helps identify sub-standard conditions and/or practices. Inspections provide the opportunity to correct poor health and safety practices before incidents, accidents and/or near-misses occur.

## 2 Scope

This procedure applies to all workplaces and work-related activities performed by the workplace parties under the control of the organization. Workplace inspections will incorporate all premises inclusive of job sites, buildings, yard, shop/warehouse, temporary structures, etc. Pre-use inspections will cover vehicles, machines, tools, and equipment.

## 3 Definitions

**Action Plan:** A plan that identifies the tasks to be accomplished, assigns responsibilities for completing each task, identifies the timeline in which it is to be completed, and records the actual action taken and completion dates. [Ref. COR 2020 Audit Handbook].

**Commercial Motor Vehicle is:**

- a truck or highway tractor with a gross weight or registered gross weight of more than 4,500 kilograms (kg) or
  - a bus with a seating capacity for ten or more passengers
- [MTO Guidelines]


**Competency:** A person performing a task for, or on behalf of, the organization is competent to do so by means of appropriate:

- a) Knowledge of the hazards and risks associated with the tasks for the operations and activities.
- b) Demonstrated understanding and working knowledge of the control measures associated with the hazards and risks.
- c) Training regarding the hazards, risks, and associated control measures
- d) Aptitudes, such as skillset, ability, and willingness to deal with the hazards, risks, and control measure.

[Ref. COR 2020 Audit Handbook].

**Competent Person:** A person who,

- a) is qualified because of knowledge, training, and experience to organize the work and its performance,

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- b) is familiar with this Act and the regulations that apply to the work, and
- c) has knowledge of any potential or actual danger to health or safety in the workplace.

[Ref. OHSA].

**Competent Worker:** In relation to specific work, means a worker who,

- a) is qualified because of knowledge, training, and experience to perform the work,
- b) is familiar with the Occupational Health and Safety Act and with the provisions of the regulations that apply to the work, and
- c) has knowledge of all potential or actual danger to health or safety in the work.

[Ref. O. Reg. 213/91: Construction Projects under OHSA].

**Compliance:** Meeting all requirements outlined within applicable legislation and regulations. [Ref. COR 2020 Audit Handbook].

**Conformity:** Fulfillment of a requirement. [Ref. COR 2020 Audit Handbook].

**Corrective Action:** Action to eliminate the cause of a non-conformity and to prevent recurrence. There can be more than one cause for a non-conformity. [Ref. COR 2020 Audit Handbook].


**Document:** Medium containing information related to the OHSMS. [Ref. COR 2020 Audit Handbook].

**Employer:** A person who employs one or more workers or contracts for the services of one or more workers and includes a contractor or subcontractor who performs work or supplies services and a contractor or subcontractor who undertakes with an owner, constructor, contractor, or subcontractor to perform work or supply services [Ref. OHSA].

**Hazard:** Source, situation, or act with a potential for harm in terms of human injury. [Ref. COR 2020 Audit Handbook].

**Health and Safety Representative:** A worker that brings awareness to safety concerns and facilitates communication between the constructor, supervisor, and the workers regarding safety.

- At a project or other workplace where no committee is required and where the number of workers regularly exceeds five, the constructor or employer shall cause the workers to select at least one health and safety representative from among the workers at the workplace who do not exercise managerial functions.

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[Ref. OHSA].

**Interested Parties:** Persons or groups, inside or outside the workplace, concerned with or affected by OHS performance of an organization. [Ref. COR 2020 Audit Handbook].

**Joint Health and Safety Committee (JHSC):** An advisory body composed of worker and management representatives that are committed to improving health and safety conditions in the workplace. A joint health and safety committee is required at workplace,

- at which twenty or more workers are regularly employed;
- with respect to which an order to an employer is in effect;
- other than a construction project where fewer than twenty workers are regularly employed, with respect to which a regulation concerning designated substances applies.

This requirement does not apply to a constructor at a project at which work is expected to last less than three months [Ref. OHSA].

**Legal Requirements:** All applicable legislation, including but not limited to the Occupational Health and Safety Act and its regulations [Ref. COR 2020 Audit Handbook].


**Management:** People who have care and control over people and/or processes [Ref. COR 2020 Audit Handbook].

- **Middle Management (Project Manager, Office Manager, etc.):** A group of managers who administers and/or supervises the affairs of a department or division at the level below senior management of the company or organization.

**Non-conformity:** Non-fulfillment of a requirement [Ref. COR 2020 Audit Handbook].

**Occupational Health and Safety (OHS):** Conditions and factors that affect or could affect the health and safety of employees or other workers, inclusive of temporary workers and contractor personnel, visitors, suppliers, vendors, or any other person in the workplace. [Ref. COR 2020 Audit Handbook].

**Occupational Health and Safety Management System (OHSMS):** As defined in the OHSA “means a coordinated system of procedures, processes and other measures that is designed to be implemented by employers to promote continuous improvement in occupational health and safety. [Ref. COR 2020 Audit Handbook].

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**Organization:** Company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public, or private, that has its own functions, management, and administration. [Ref. COR 2020 Audit Handbook].

**Other Requirements:** Requirements or provisions the organization subscribes, however are not legally binding, such as industry standards. [Ref. COR 2020 Audit Handbook].

**Participation:** Involvement of workers, or worker representatives, in decision-making process(es) regarding the OHSMS. [Ref. COR 2020 Audit Handbook].

**Plan:** Detailed method for doing or achieving something. [Ref. COR 2020 Audit Handbook].

**Policy:** A policy is a general commitment, direction or intention and is formally stated by top management. A quality policy statement should express top management's commitment to the implementation and improvement of its management system. [Ref. COR 2020 Audit Handbook].

**Preventative Action:** Action to eliminate the cause of potential non-conformity or other potential undesirable potential situation. There can be more than one cause for a potential nonconformity. (For the purposes of this Standard, this refers to any action taken to fix a potential OHS problem.) [Ref. COR 2020 Audit Handbook].

**Procedure:** A documented, specified method to carry out an activity. **Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].


**Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].

**Project:** a construction project, whether public or private, including,

- the construction of a building, bridge, structure, industrial establishment, mining plant, shaft, tunnel, caisson, trench, excavation, highway, railway, street, runway, parking lot, cofferdam, conduit, sewer, watermain, service connection, telegraph, telephone or electrical cable, pipe line, duct or well, or any combination thereof,
- the moving of a building or structure, and
- any work or undertaking, or any lands or appurtenances used in connection with construction.

[Ref. OHSA].



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**Record:** Document stating results achieved or providing evidence of activities performed. [Ref. COR 2020 Audit Handbook].

**Senior Management (Company President, Vice President of Operations):** Person(s) at the highest level of an organization's structure responsible for leading, managing and /or directing an organization's day-to-day activities and/or operations. [Ref. COR 2020 Audit Handbook].

**Supervisor:** A person who has charge of a workplace or authority over a worker. [Ref. OHSA].

**Trailer:** Includes, but is not limited to, boat, snowmobile, livestock, and general-purpose utility trailers. "Trailer" does not include devices such as tar pots, portable welders, cement mixers, compressors and farm implements such as wagons and so on. [MTO Guidelines].

**Truck:** Includes, but is not limited to, truck tractors, straight trucks, pickup trucks, curbside/cube vans, trade vans/panel trucks. [MTO Guidelines].

**Worker:** Any of the following, but does not include an inmate of a correctional institution or like institution or facility who participates inside the institution or facility in a work project or rehabilitation program:


- a) A person who performs work or supplies services for monetary compensation.
- b) A secondary school student who performs work or supplies services for no monetary compensation under a work experience program authorized by the school board that operates the school in which the student is enrolled.
- c) A person who performs work or supplies services for no monetary compensation under a program approved by a college of applied arts and technology, university, private career college or other post-secondary institution.
- e) Such other persons as may be prescribed who perform work or supply services to an employer for no monetary compensation.

[Ref. OHSA].

**Workplace:** Any land, premises, location, or thing at, upon, in or near which a worker works [Ref. COR 2020 Audit Handbook].

**Workplace Parties:** Includes, but is not limited to, the employer, supervisor(s), workers, constructor, visitors, and owner. [Ref. COR 2020 Audit Handbook].

## 4 Procedure

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At Bestco Construction Ltd., inspections will be conducted as per the promulgated inspection schedule which is developed based on the following:

- legislative requirements,
- manufacturer's recommendations, and/or
- industry best practice and standards.

Identifying and preventing potential non-conformities will be the main aim for conducting inspections. All corrective actions will be implemented in a timely manner.

#### 4.1. Types of Inspections

- (a) JHSC/H&S Rep Inspections – Workplaces with 6 plus workers - (Office/Shop/Projects, etc.)

Joint Health and Safety Committee (JHSC) Worker Representative (if applicable) or Health and Safety Representative (H&S Rep) of the workplace will inspect the physical condition of the workplace monthly. The inspection will be conducted using the **Monthly Inspection Form**. During the inspection, a minimum of one worker will be interviewed to address any concerns regarding health and safety in the workplace.


JHSC Worker Representative or the Health and Safety Representative will send the inspection report to senior management and will make any recommendations in writing regarding corrective actions. Senior management (on behalf of the employer) will review the recommendations and respond within 21 days.

NOTE: Inspection by JHSC Worker Representative is only applicable in following situations:

- at a workplace at which twenty or more workers are regularly employed.
- at a workplace with respect to which an order to an employer is in effect; or
- at a workplace, other than a construction project where fewer than twenty workers are regularly employed, with respect to which a regulation concerning designated substances applies.

Projects that are expected to last less than three months are exempt from establishing a JHSC requirement.

[OHSA, s. 8 & 9]

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- (b) Site Supervisor Inspection – Construction Projects (Projects with 5 plus workers)

Planned inspections will occur weekly on construction project sites. The site supervisor or a competent person will perform a weekly inspection of the site using the **Weekly Site Inspection Form**. Any deficiencies found must be corrected in a timely manner.

A supervisor appointed by the Constructor, or a competent person appointed by the supervisor shall inspect all machinery and equipment, including fire extinguishing equipment, magazines, electrical installations, communication systems, sanitation and medical facilities, buildings and other structures, temporary supports and means of access and egress at a project to ensure that they do not endanger any worker.

Inspection reports will be reviewed during toolbox safety talks. The inspection reports will be evaluated and monitored by management. Records will be available for review.

[O.Reg.213/91: Construction Projects, s.14]

- (c) Middle Management Inspections


Project Managers will conduct minimum one planned inspection at a project site quarter-yearly. The inspection will be documented using the **Management Inspection Form**.

Facility managers may accompany the individual who is conducting the monthly workplace inspection on a quarter-yearly basis.

Appropriate personnel will be notified of deficiencies found, and corrective action will be taken immediately.

- (d) Senior Management Inspections

Senior management will conduct at least one planned inspection of a workplace (Office/Shop/Projects, etc.) annually. The inspection will be documented using the **Management Inspection Form**. Appropriate personnel will be notified of deficiencies found, and corrective action will be taken immediately.

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(e) Equipment Pre-Use Inspections

Equipment is to be operated by a competent worker who has been trained or instructed on the use. Pre-use inspections will be performed by the worker operating the equipment.

All pre-use will be done in accordance legislative requirements, manufacture's guidelines and/or industry best practices and standards.


The following will be considered as part of the inspection:

- Align with pre-use inspection guidelines as prescribed in manufacturer's guidelines.
- Identify vehicle, machine, tool, or equipment that are defective or hazardous.
- Identify vehicle, machine, tool, or equipment that are due for service.
- For vehicles, machines, tools, and equipment rated at greater than 10 horsepower, if copies of any operating manuals issued by the manufacturers are kept readily available at the project.
- Complete the appropriate pre-use inspection form.
- All vehicles, machines, tools, and equipment shall be used in accordance with any operating manuals issued by the manufacturers.
- All mechanically powered vehicles, machines, tools and equipment rated at greater than 10 horsepower shall be inspected:
  - by a competent worker to determine whether they can handle their rated capacity and to identify any defects or hazardous conditions;
  - before the vehicles, machines, tools, or equipment are first used at the project and thereafter at least once a year or more frequently as recommended by the manufacturer.

[O.Reg.213/91: Construction Projects, s. 93 & 94]

(f) Commercial motor vehicle Pre-trip (Circle Check) Inspection


Commercial motor vehicle must follow Ministry of Transportation Guidelines. Trucks, mobile equipment vehicles, trailers, and converter dollies that, on their own or in combination, have a total gross weight or registered gross weight exceeding 4,500 kilograms will be inspected daily using **Daily inspection - trucks, tractors and trailers form (Logbook) (only in acceptable format by Ministry of Transportation)**, and the inspection and report are only valid for

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24 hours. An annual inspection will be conducted in addition to the daily inspection.

(Regulation O. Reg. 199/07: Commercial Motor Vehicle Inspections under Highway Traffic Act)

- (g) Commercial motor Vehicle Annual inspections - Truck, Mobile Equipment Vehicle, Trailer, and Converter Dolly
- Annual inspection must be completed as per the requirements in National Safety Code 11, Part B, Periodic Commercial Motor Vehicle Inspections (NSC 11B) and HTA Regulation 611 (Safety Inspections) under Highway Traffic Act.
  - A yellow annual inspection sticker is applied to the lower left-hand side of the windshield, or a conspicuous position on the left side of the truck cab, indicating the month and year the inspection was completed.
  - All previous inspection stickers are covered or removed.
  - The inspection is valid for 12 months.
  - Motor Vehicle Inspection Station (MVIS) licensee must provide the owner/operator with a copy of the annual inspection certificate and the annual inspection report
- (h) Emergency Response Equipment Inspection
- Fire extinguishers are inspected monthly following manufacturer's guidelines. The inspection will be completed through **Fire Extinguisher Inspection form** and the tags will be marked with the date of the most recent inspection and the initials of the person making the inspection.
- At project sites, fire extinguishers will be inspected by the supervisor or competent person appointed by the supervisor.
  - Office and other facility fire extinguishers will be inspected by the JHSC Worker Representative (if applicable) or Health and Safety Representative during their monthly workplace inspection or by a competent person monthly.
- All other emergency response equipment shall be inspected based on manufacturer's requirement.
- Refer to **BESTCO-PRO-11.0 - Emergency Preparedness Procedure** for additional information.

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<b>Approved By: Michael Zaborsky, President</b>		<b>Date: 02 Sept, 2025</b>


(i) First Aid Kit Inspection

All workplaces must have a first aid station. First aid stations must be positioned in a conspicuous location and accessible to everyone.

A first aid station shall contain,

- a first aid box containing the items required by this Regulation; and
- a notice board displaying,
  - i. the Board's poster known as Form 82,
  - ii. the valid first aid certificates of qualification of the trained workers on duty, and
- an inspection card with spaces for recording the date of the most recent inspection of the first aid box and the signature of the person making the inspection.
- The following content of the first aid box will be verified as part of the inspection:


No. of Workers	First Aid Station Requirements	First Aid Kit/Box Requirements
0 to 5	<ul style="list-style-type: none"> <li>Current edition of the St. John's Ambulance First Aid Manual</li> <li>Current edition of Reg.1101</li> <li>First aid kit inspection form</li> <li>First aid log</li> <li>First aider's certificate</li> <li>Form 82</li> </ul>	<ul style="list-style-type: none"> <li>1 card of safety pins</li> <li>12 adhesive dressings individually wrapped</li> <li>4 sterile gauze pads, 3 inches wide</li> <li>2 rolls of gauze bandage, 2 inches wide</li> <li>2 field dressings, 4 inches square or 2 four-inch sterile bandage compresses</li> <li>1 triangular bandage</li> <li>Non-latex gloves</li> <li>CPR mask</li> </ul>
6 to 15	<ul style="list-style-type: none"> <li>Current edition of the St. John's Ambulance First Aid Manual Current edition of Reg.1101</li> <li>First aid kit inspection form</li> <li>First aid log</li> <li>First aider's certificate</li> <li>Form 82</li> </ul>	<ul style="list-style-type: none"> <li>1 card of safety pins</li> <li>24 adhesive dressings individually wrapped</li> <li>12 sterile gauze pads, 3 inches wide</li> <li>4 rolls of 2-inch gauze bandage</li> <li>4 rolls of 4-inch gauze bandage</li> <li>4 sterile surgical pads suitable for pressure dressings, individually wrapped</li> <li>6 triangular bandages</li> <li>2 rolls of splint padding</li> <li>1 roll-up splint</li> </ul>

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No. of Workers	First Aid Station Requirements	First Aid Kit/Box Requirements
		<ul style="list-style-type: none"> <li>• Non-latex gloves</li> <li>• CPR mask</li> </ul>
16-199	<ul style="list-style-type: none"> <li>• Current edition of the St. John's Ambulance First Aid Manual</li> <li>• Current edition of Reg.1101</li> <li>• First aid kit inspection form</li> <li>• First aid log</li> <li>• First aider's certificate</li> <li>• 1 stretcher</li> <li>• 2 blankets</li> <li>• Form 82</li> </ul>	<ul style="list-style-type: none"> <li>• 24 safety pins</li> <li>• 1 basin, preferably stainless steel</li> <li>• 48 adhesive dressings individually wrapped</li> <li>• 2 rolls adhesive tape, 1 inch wide</li> <li>• 12 rolls of 1-inch gauze bandage</li> <li>• 48 sterile gauze pads, 3 inches square</li> <li>• 8 rolls of 2-inch gauze bandage</li> <li>• 8 rolls of 4-inch gauze bandage</li> <li>• 6 sterile surgical pads suitable for pressure dressings, individually wrapped</li> <li>• 12 triangular bandages</li> <li>• Splints of assorted sizes</li> <li>• 2 rolls of splint padding</li> <li>• Non-latex gloves</li> <li>• CPR mask</li> </ul>

- The inspector will examine the first aid kit in their work area and document the results of their inspection on the **First Aid Kit Inspection Form**.
- Any deficiencies or missing items will be notified to management.
- Management will replace the missing or damaged item immediately to be in compliance with O. Reg. 1101.
- The first aid boxes and their contents will be inspected at not less than quarter-yearly intervals using the **First Aid Kit Inspection Form**.
- The inspection card for each box will be marked with the date of the most recent inspection and the signature of the person making the inspection.
  - At project sites, first aid kits will be inspected minimum on a quarter-yearly basis by the supervisor, competent person appointed by the supervisor or designated first aid attendant for the work area. Where there is no site office for the project, a first aid station shall be maintained in a vehicle.
- Office and other facility first aid kits will be inspected minimum on a quarter-yearly basis by the JHSC Worker Representative (if applicable)



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, Health and Safety Representative, designated first aid attendant or competent person appointed by the Management.  
[Workplace Safety and Insurance Act, O.Reg.1101: First Aid Requirements]


Refer to **BESTCO-PRO-11.0 - Emergency Preparedness Procedure** for additional information.

#### 4.2. Inspection Schedule


The table below outlines the inspection schedule:

Type of Inspection	Inspection premises	Minimum Frequency	Who & Type of Form	Comments
JHSC/H&S Rep Inspection	Workplace (Office/Shop /Warehouse/Yard/ Projects, etc.) with 6 plus workers	Monthly	JHSC Worker Rep or H&S Rep  <b>Monthly Inspection Form</b>	If there is no JHSC required, inspection will be carried out by H&S Rep.  <b>Refer to s. 4.1(a)</b>
Site Supervisor Inspection	Project Sites with 5 plus workers	Weekly	Site Supervisor  <b>Weekly Site Inspection Form</b>	<b>Refer to s. 4.1(b)</b>
Middle Management Inspection	One workplace	Quarter-Yearly	Project Managers/Facility Managers  <b>Management Inspection Form</b>	<b>Refer to s. 4.1(c)</b>
Senior Management Inspection	One workplace	Annually	Senior Management  <b>Management Inspection Form</b>	<b>Refer to s. 4.1(d)</b>
Equipment Pre-Use Inspection	All mechanically powered vehicles, machines, tools and equipment rated at greater	Before first use and thereafter at least once a year OR more	Competent Worker	<b>Refer to s. 4.1(e)</b>



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Type of Inspection	Inspection premises	Minimum Frequency	Who & Type of Form	Comments
	than 10 horsepower	frequently based on Manufacturer's guidelines		
	All other vehicles, machines, tools, and equipment	Based on Manufacturer's guidelines	Competent Worker	<b>Refer to s. 4.1(e)</b>
Commercial motor vehicles	Truck, Mobile Equipment Vehicle, Trailer, and Converter Dolly	Daily (every 24 hours)	Operator <b>Daily inspection - trucks, tractors, and trailers (Logbook)</b>	<b>Refer to s. 4.1(f)</b>
		Annually	Motor Vehicle Inspection Station (MVIS) licensee  Report provided by MVIS licensee	<b>Refer to s. 4.1 (g)</b>
Emergency Response Equipment	Fire Extinguisher at project sites/vehicles	Monthly	Supervisor or competent person appointed by the supervisor  <b>Fire Extinguisher Inspection Form</b>	<b>Refer to s. 4.1 (h)</b>
	Fire Extinguisher at other facilities	Monthly	JHSC Worker Rep or Health and Safety Rep during their monthly workplace inspection, or by a competent person.  <b>Fire Extinguisher Inspection Form</b>	<b>Refer to s. 4.1(h)</b>


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Type of Inspection	Inspection premises	Minimum Frequency	Who & Type of Form	Comments
	Other Emergency Response Equipment	Based on Manufacturer's guidelines	Competent person	<b>Refer to s. 4.1(h)</b>
First Aid Kit Inspection	Project Sites	Quarter-Yearly	Supervisor, competent person appointed by the supervisor or designated first aid attendant  <b>First Aid Kit Inspection Form</b>	<b>Refer to s. 4.1(i)</b>
	Other facilities	Quarter-Yearly	JHSC Worker Rep, Health and Safety Rep, designated first aid attendant or competent person appointed by the Management  <b>First Aid Kit Inspection Form</b>	<b>Refer to s. 4.1(i)</b>

#### 4.3. Follow Up and Corrective Actions

The nonconformities and deficiencies identified during the workplace inspections will be notified to the direct supervisor or management through **4SafeCom™** and via emails as appropriate. The corrective actions will be assigned to the relevant personnel, and the actions will be taken place within the time frame based on the criticality of the non-conformity or deficiency. Appropriate follow ups will be made by management.

JHSC Worker Representative or the Health and Safety Representative will send their inspection report to senior management and will make any recommendations in writing regarding corrective actions. Senior management (on behalf of the employer) will review the recommendations and respond within 21 days. Status of the non-conformities will be discussed as part of the JHSC meetings.

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Management shall use the **Non-conformity Tracker** to track the non-conformities, actions, responsible person, target completion date, actual completion date and verification of the effectiveness of the corrective actions. Senior management shall monitor the process through **4SafeCom™** and review the overall process.

Management will ensure that the cause for any non-conformity is eliminated, and steps will be taken to prevent reoccurrence. Management will review the inspection reports on a regular basis **4SafeCom™**. Any follow ups on corrective actions will be communicated to relevant workplace parties. The records from the inspection would be used to identify trends which would be utilized as input for the Statistics and Management review process.

#### 4.4. Communication

The nonconformities and deficiencies identified during the workplace inspections will be notified to appropriate hierarchy of management through **4SafeCom™** and via emails as appropriate.


Results of workplace inspections will be communicated to workplace parties through toolbox talks, bulletin, JHSC Minutes, town halls, pre-shift huddles, workshops, emails etc. Monthly JHSC Inspection and/or Health and Safety Representative inspection reports will be posted on the safety boards.

## 5 Roles and Responsibilities

Responsibilities and accountabilities of workplace parties ensures a commitment by workplace parties ensuring a safe and healthy work environment. The responsibilities of workplace parties are outlined as per the Organization Chart and listed below with the specific roles within the organization.

### 5.1. Senior Management

- Allocate the time, budget, and resources for ensuring the workplace inspections are conducted.
- Ensure that a process in place that all relevant workplace parties are informed on workplace and pre-use inspection results, as applicable.
- Conduct minimum one formal inspection of a workplace (Office/Shop/Projects, etc.) annually.
- Interact with workers and receive their input during inspection.

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- Review the results of the inspections and ensure corrective actions have been taken to address identified non-conformities.
- Provide written response to any JHSC recommendations within 21 days.

## 5.2. Middle management


- Participate in formal inspections quarter-yearly.
- Interact with workers and receive their input during inspection.
- Communicate the inspection findings to Senior Management and other relevant workplace parties.
- Develop and implement a corrective action plan to eliminate the causes of the non-conformities.
- Assign responsible parties to implement corrective actions.
- Monitor the corrective action plans.
- Analyze information from inspections to establish trends of unsafe conditions and/or unsafe behaviours.
- Identify actions to prevent reoccurrence and provide input for management.

## 5.3. Supervisors

- Conduct weekly inspections for project sites, as applicable.
- Interact with workers and receive their input during inspection.
- Communicate the inspection findings to Management and other relevant workplace parties.
- Develop and implement a corrective action plan to eliminate the causes of the non-conformities.
- Assign responsible parties to implement corrective actions.
- Monitor the corrective action plans.
- Identify actions to prevent reoccurrence and provide input for management.

## 5.4. Joint Health and Safety Committee (if applicable)/Health and Safety Representative

- JHSC to appoint the work representative of the committee to conduct inspection.
- JHSC Worker Representative and/or Health and Safety Representative to conduct monthly inspections for the workplace.
- Interact with workers and receive their input during inspection.
- Communicate the inspection findings to Management and other relevant workplace parties.

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- Discuss the finding in JHSC meetings, as applicable.
- Provide written response to Senior Management.
- Follow up with relevant workplace parties regarding Senior Management's written response on recommendations

### 5.5. Designated Maintenance Person/Department


- Ensure Commercial Vehicles are inspected annually by Motor Vehicle Inspection Station (MVIS) licensee.
- Ensure all inspection forms are aligned with equipment specific manufacturers guidelines.

### 5.6. Workers

- Conduct pre-use inspection as required.
- Communicate the inspection findings to Supervisor/Management.
- Ensure not to proceed with operating any equipment that is identified with non-conformity or deficiency. Ensure the equipment is tagged as out of service to avoid accidental use by others
- Inform any hazard to your Supervisor/Management immediately.
- Encouraged to participate in supervisor/management inspection by providing feedback.

## 6 Related Documents/Forms

- BESTCO-PRO-01.2-Document and Record Control Procedure
- BESTCO-PLY-09.0-Workplace Inspection Policy
- BESTCO-PRO-11.0-Emergency Preparedness
- Weekly Inspection Form - Site
- Monthly Inspection Form - Office and other facilities
- Monthly Inspection Form - Site
- Management Inspection Form
- Fire Extinguisher Inspection Form
- First Aid Kit Inspection Form
- Pre-use Inspection Forms (Vehicles, Machines, Tools, and Equipment)
- Toolbox talk form
- JHSC Recommendation Form
- 4SafeCom™ Inspection Forms

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## 7 Document and Record Maintenance


Documents and Records are maintained as per **BESTCO-PRO-01.2-Document and Record Control Procedure**.

## 8 Record Retention

Ensure workplace and pre-use inspection records are retained for at least 3 years.

## 9 Legislated/Other References

- Duties of constructors – Occupational Health and Safety Act, s. 23
- Duties of employers – Occupational Health and Safety Act, s. 25, 26
- Duties of supervisors – Occupational Health and Safety Act, s. 27
- Duties of workers – Occupational Health and Safety Act, s. 28
- Health and Safety Representative – Occupational Health and Safety Act, s. 8
- Joint Health and Safety Committee – Occupational Health and Safety Act, s. 9
- O. Reg. 213/91: Construction Projects, s. 14, 93, 94 under Occupational Health and Safety Act
- Ministry of Transport (MTO) Guideline
- Commercial Vehicle Operators' Safety Manual
- O. Reg. 199/07: Commercial Motor Vehicle Inspections, under Highway Traffic Act
- O. Reg. 611: Safety Inspections, under Highway Traffic Act
- O. Reg. 1101: First Aid, under Workplace Safety and Insurance Act
- O. Reg. 213/07: Fire Code, under Fire Protection and Prevention Act

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## Workplace Inspections Policy

The workplace inspections shall serve as a proactive method to verify if controls are effective and ensure hazards are identified. As part of the workplace inspection process Bestco Construction Ltd. shall ensure that the nonconformities are identified, corrective actions are taken in a timely manner and communicated to the relevant workplace parties.

Senior management is committed to allocating the time, budget, and resources for establishing and maintaining the workplace inspection program.

Bestco Construction Ltd. will ensure the inspections are carried out by relevant workplace parties in accordance with the Workplace Inspections Procedure. All workplace and pre-use inspections are conducted, and records are documented. All workplace parties who conduct formal workplace inspections shall be trained on their responsibilities and on how to complete the workplace inspection checklist.

The program and its performance shall be reviewed annually for sustainability, adequacy, and effectiveness.




Name: Michael Zaborsky

Title: President

Company: Bestco Construction (2005) Ltd.

Sept. 2, 2025

Date: 02 September, 2025

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## Investigations and Reporting Policy

Bestco Construction Ltd. requires all workers to immediately report all accidents and incidents that result in injury or property damage, and all near misses to their supervisor. These accidents and incidents will be investigated by the Management and/or Project Supervisor (or his/her competent replacement), in a timely manner. The Management is committed to legislative compliance, protection of the health and safety of its employees and prevention of work-related injuries by allocating resources, conducting prompt investigations, thorough root cause analysis and implementation of corrective action plan.

The purpose of the Investigation and Reporting policy and procedure is to allow all workplace incidents and accidents to be reported and investigations to be carried out. It is our policy that one supervisor and one worker will investigate all fatalities, critical injuries, lost time, medical aid, occupational illnesses, significant property damage, fires/explosions, or environmental releases. Supervisors will report the investigated accident/incident promptly to management to ensure timely notifications and submissions to the Ontario Ministry of Labour, Training and Skills Development and/or Workplace Safety and Insurance Board. The investigations will be conducted with the purpose of determining the root causes and contributing factors of the accident/incident. This analysis will be used to reduce or eliminate the risk of further incident.


All investigation reports will be reviewed by management. Management will implement corrective and preventative actions in a timely manner to ensure no similar incidents occur. Management will verify the effectiveness of corrective actions.

The reporting program will be carried out in accordance with what is required by the Occupational Health and Safety Act s. 51-53.1, and the O. Reg. 420/21: Notices and Reports Under Sections 51 to 53.1 of the Act – Fatalities, Critical Injuries, Occupational Illnesses and Other Incidents.

Bestco Construction Ltd. understands the importance of incident investigations and reporting procedures. The management has established a standardized incident investigation form that will be readily available in areas of the organization for all personnel. Relevant workplace parties will be trained on this policy and procedure.

Senior Management is committed to providing the necessary budget, time, and resource for establishing and maintaining the program. The program and its performance shall be reviewed annually for sustainability, adequacy, and effectiveness.



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Name: Michael Zaborsky

Title: President

Company: Bestco Construction (2005) Ltd.


Sept. 2, 2025

Date: 02 September, 2025

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# Investigations and Reporting Procedure

<b>Version No.</b>	<b>Reason for Revision:</b>	<b>Developed By and Date:</b>	<b>Reviewed By and Date:</b>	<b>Approved By and Date:</b>
1	To meet COR 2020 Standards, company's health and safety processes and Ontario's Health and Safety Legislative Requirements.	Emma Lisson, Health and Safety Coordinator 11 July, 2025	Michael Zaborsky and Ovidiu Cotiga, Senior Management 18 August, 2025	Michael Zaborsky, President 02 September, 2025

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## 1 Purpose

Bestco Construction Ltd.'s Investigations and Reporting program is to provide instruction and guidance to all our workers to ensure that all reportable workplace incidents are investigated, as necessary. This procedure ensures that all incidents are reported to the appropriate workplace parties as per all applicable OHSA and regulations and the analysis of the investigations is reviewed by the management team. The goal of an investigation is to find the root cause of the incident and identify corrective and preventative actions so that recommendations are made to prevent fatalities or the same incident from occurring again.

## 2 Scope

This procedure applies to all types of workplace incidents and includes all work or work-related activities performed under the control of the organization by workplace parties.

## 3 Definitions

**Competency:** A person performing a task for, or on behalf of, the organization is competent to do so by means of appropriate:


- Knowledge of the hazards and risks associated with the tasks for the operations and activities.
- Demonstrated understanding and working knowledge of the control measures associated with the hazards and risks.
- Training regarding the hazards, risks, and associated control measures d) Aptitudes, such as skillset, ability, and willingness to deal with the hazards, risks, and control measure.

[Ref. COR 2020 Audit Handbook].

**Competent Person:** A person who,

- is qualified because of knowledge, training, and experience to organize the work and its performance,
- is familiar with this Act and the regulations that apply to the work, and
- has knowledge of any potential or actual danger to health or safety in the workplace.

[Ref. OHSA].

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**Competent Worker:** In relation to specific work, means a worker who,

- is qualified because of knowledge, training, and experience to perform the work,
- is familiar with the Occupational Health and Safety Act and with the provisions of the regulations that apply to the work, and
- has knowledge of all potential or actual danger to health or safety in the work.

[Ref. O. Reg. 213/91: Construction Projects under OHSA].

**Compliance:** Meeting all requirements outlined within applicable legislation and regulations. [Ref. COR 2020 Audit Handbook].

**Conformity:** Fulfillment of a requirement. [Ref. COR 2020 Audit Handbook].

**Contractor:** A person or organization providing services to another organization in accordance with agreed upon specification, terms, and conditions.  
[Ref. COR 2020 Audit Handbook].

- A subcontractor is a person or organization that takes a portion of a contract from the principal contractor or another subcontractor

**Constructor:** A person who undertakes a project for an owner and includes an owner who undertakes all or part of a project by himself or by more than one employer [Ref. OHSA].


**Corrective Action:** Action to eliminate the cause of a non-conformity and to prevent recurrence. There can be more than one cause for a non-conformity. [Ref. COR 2020 Audit Handbook].

**Critically Injured:** means an injury of a serious nature that,

- places life in jeopardy,
- produces unconsciousness,
- results in substantial loss of blood,
- involves the fracture of a leg or arm but not a finger or toe,
- involves the amputation of a leg, arm, hand, or foot but not a finger or toe,
- consists of burns to a major portion of the body, or
- causes the loss of sight in an eye;

[Ref O. Reg 420/21: Notices and Reports under Section 51 to 53.1 of the Act – Fatalities, critical injuries, occupational illnesses, and other incidents under the OHSA].

**Document:** Medium containing information related to the OHSMS. [Ref. COR 2020 Audit Handbook].

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**Environmental Release:** Environmental Release means an accidental discharge of a physical, biological, or chemical substance into the workplace and/or community. This includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, disposing or migration into the environment.

**Employer:** A person who employs one or more workers or contracts for the services of one or more workers and includes a contractor or subcontractor who performs work or supplies services and a contractor or subcontractor who undertakes with an owner, constructor, contractor, or subcontractor to perform work or supply services [Ref. OHS].

**Fatality:** An injury that results in the loss of life.

**Fire or Explosions:** An event where undesired combustion occurs.

**First Aid:** Refers only to injuries that can be treated on the job without any days lost. Includes but is not limited to cleaning minor cuts, scrapes or scratches; treating a minor burn, applying bandages and/or dressings, cold compress, cold pack, ice bag, splint, changing a bandage or a dressing after a follow-up observation visit and any follow-up for observation purposes only.


**Hazard:** Source, situation, or act with a potential for harm in terms of human injury. [Ref. COR 2020 Audit Handbook].

**Health and Safety Representative:** A worker that brings awareness to safety concerns and facilitates communication between the constructor, supervisor, and the workers regarding safety. In workplaces, including construction projects, at which the number of workers regularly exceeds five and at which no joint health and safety committee is required. [Ref. OHS].

**Incident:** Work related event(s) in which an injury, fatality or occupational illness occurred; and includes event(s) where no injury or illness occurred, such as a near hit or property damage. [Ref. COR 2020 Audit Handbook].

**Interested Parties:** Persons or groups, inside or outside the workplace, concerned with or affected by OHS performance of an organization. [Ref. COR 2020 Audit Handbook].

**Joint Health and Safety Committee (JHSC):** An advisory body composed of worker and management representatives that are committed to improving health and safety conditions in the workplace. A joint health and safety committee is required at workplace,

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- a) at which twenty or more workers are regularly employed;
- b) with respect to which an order to an employer is in effect;
- c) other than a construction project where fewer than twenty workers are regularly employed, with respect to which a regulation concerning designated substances applies.

This requirement does not apply to a constructor at a project at which work is expected to last less than three months [Ref. OHSA].

**Lost Time Injury (LTI):** Refers to any work-related injury that prevents a worker from coming to work on the next scheduled shift following the day of the injury.

**Legal Requirements:** All applicable legislation, including but not limited to the Occupational Health and Safety Act and its regulations. [Ref. COR 2020 Audit Handbook].

**Management:** People who have care and control over people and/or processes [Ref. COR 2020 Audit Handbook].

- **Middle Management (Project Manager, Office Manager, etc.):** A group of managers who administers and/or supervises the affairs of a department or division at the level below senior management of the company or organization.


**Medical Aid:** Refers to any injury not severe enough to warrant more than the day of injury off, but where medical treatment by a health care provider is given.

**Medical attention:** Treatment from a legally qualified medical practitioner or a registered nurse who holds an extended certificate of registration under the Nursing Act, 1991. [Ref. O.Reg.420/21]

**Near Miss:** A situation in which no injury or damage occurred but might have resulted in physical harm to an individual or damage to the environment, equipment, property, or material if conditions had been slightly different.

**Non-conformity:** Non-fulfillment of a requirement [Ref. COR 2020 Audit Handbook].

**Occupational Health and Safety (OHS):** Conditions and factors that affect or could affect the health and safety of employees or other workers, inclusive of temporary workers and contractor personnel, visitors, suppliers, vendors, or any other person in the workplace. [Ref. COR 2020 Audit Handbook].

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**Occupational Health and Safety Management System (OHSMS):** As defined in the OHSA “means a coordinated system of procedures, processes and other measures that is designed to be implemented by employers to promote continuous improvement in occupational health and safety. [Ref. COR 2020 Audit Handbook].

**Occupational Illness:** A condition that results from exposure in a workplace to a physical, chemical, or biological agent to the extent that the normal physiological mechanisms are affected, and the health of the worker is impaired thereby and includes an occupational disease for which a worker is entitled to benefits under the Workplace Safety and Insurance Act, 1997.

**Organization:** Company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public, or private, that has its own functions, management, and administration. [Ref. COR 2020 Audit Handbook].

**Owner:** Includes a trustee, receiver, mortgagee in possession, tenant, lessee, or occupier of any lands or premises used or to be used as a workplace, and a person who acts for or on behalf of an owner as an agent or delegate. [Ref. OHSA].

**Policy:** A policy is a general commitment, direction or intention and is formally stated by top management. A quality policy statement should express top management's commitment to the implementation and improvement of its management system. [Ref. COR 2020 Audit Handbook].


**Preventative Action:** Action to eliminate the cause of potential non-conformity or another potential undesirable potential situation. There can be more than one cause for a potential nonconformity. (For the purposes of this Standard, this refers to any action taken to fix a potential OHS problem.) [Ref. COR 2020 Audit Handbook].

**Procedure:** A documented, specified method to carry out an activity. **Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].

**Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].

**Record:** Document stating results achieved or providing evidence of activities performed. [Ref. COR 2020 Audit Handbook].



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**Reportable Incidents:** Incidents that result in fatalities, critical injuries, lost time, medical aid, occupational illnesses, significant property damage, fires/explosions, or environmental releases.

**Significant Property Damage:** Significant property damage is physical harm to tangible property, including all resulting loss of use of that property. All such loss of use shall be deemed to occur at the time of the physical incident to the property.

**Senior Management (Company President, Vice President of Operations):** Person(s) at the highest level of an organization's structure responsible for leading, managing and /or directing an organization's day-to-day activities and/or operations. [Ref. COR 2020 Audit Handbook].

**Supervisor:** A person who has charge of a workplace or authority over a worker. [Ref. COR 2020 Audit Handbook].


**Worker:** Any of the following, but does not include an inmate of a correctional institution or like institution or facility who participates inside the institution or facility in a work project or rehabilitation program,

- a) A person who performs work or supplies services for monetary compensation.
- b) A secondary school student who performs work or supplies services for no monetary compensation under a work experience program authorized by the school board that operates the school in which the student is enrolled.
- c) A person who performs work or supplies services for no monetary compensation under a program approved by a college of applied arts and technology, university, private career college or other post-secondary institution.
- e) Such other persons as may be prescribed who perform work or supply services to an employer for no monetary compensation

[Ref. OHSA].

**Workplace Parties:** Includes, but is not limited to, the employer, supervisor(s), workers, constructor, visitors, and owner. [Ref. COR 2020 Audit Handbook].

**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 the worker, or; a statement or behaviour that it 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. [Ref. COR 2020 Audit Handbook]

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## 4 Procedure

### 4.1. Transporting the injured person

In the case of a non-critical injury, administer first aid immediately, if possible. If further medical assistance is needed, Bestco Construction Ltd. will provide transportation to the hospital, doctors, or medical professional's office or employee's home when necessary, following an injury or illness. The preferred method of transportation is by ambulance, if required.

Should this method of transportation not be appropriate, Bestco Construction Ltd. will attempt to:

- Identify any other transportation methods that the employee would prefer.
- Reiterate the importance of accepting the transportation to the hospital, doctor's office, or home.
- Call 911 and to have an ambulance attendant to administer medical attention at the accident scene.
- Not allow the employee to continue work until medical clearance is provided.


### 4.2. Transporting Companion

The assisting employee will not be held responsible for any actions taken in good faith to assist the injured employee. Upon arrival at the hospital, the assisting employee will notify their supervisor of the injured employee's status and will continue to do so throughout the day until the situation of the injured employee is stabilized.

### 4.3. Incident Reporting

Bestco Construction Ltd. is committed to preventing workplace injuries and illnesses. To achieve this, all the following will be reported:

- Fatalities
- Critical injuries
- Lost time injuries
- Workplace violence and harassment
- Medical aid
- First aid
- Occupational illness
- Property damage
- Environmental releases

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- Near misses


#### 4.4. Non-critical Injury

In case of a non-critical injury:

1. The first witness must contact the First Aider for assistance. If deemed appropriate, the First Aider must perform First Aid. **First Aid Treatment Log** must be completed.
2. The witness must then notify the Supervisor.
3. In case the injury cannot be attended on site by the first aider, the injured person should be sent to the hospital. If transportation is required, it will be arranged by the supervisor.
4. Supervisor must complete the **Accident/Incident Investigation Form**.

#### 4.5. Critical Injury or Fatality

1. If the injury is critical or fatality occurs, the witness should immediately call 911 and the Supervisor. A person shall be assigned to direct the ambulance upon arrival.
2. The constructor, if any, and the employer shall notify an inspector-Ministry of Labour, Immigration, Training and Skills Development (MLITSD), and the joint health and committee, health and safety representative and trade union, if any, immediately of the occurrence by telephone or other direct means.
3. After emergency medical service has removed the injured from the site, preserve the accident scene and immediate area, until the MLITSD, Ontario investigates the scene. The scene must remain undisturbed except for the following purposes:
  - a. Saving life or relieving human suffering
  - b. Maintaining an essential public service or a public transportation system
  - c. Preventing unnecessary damage to equipment or other property
4. No one must be allowed to interfere with, disturb, destroy, alter, or carry away any wreckage, article, or thing at the scene of or connected with the occurrence until permission so to do has been given by an inspector. Ref. (OHSA, s. 51 (2)).
5. The employer shall, after the occurrence, complete **Form - ON00276E (2021/07) - Report of a workplace fatality, injury, illness, or incident (OHSA s. 51, 52, 53)**

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6. The report must be sent to a Director- MLITSD, and to the committee, health and safety representative and trade union, if any, within forty-eight hours.

[Occupational Health and Safety Act, s.51]

#### 4.6. Notice of occupational illness


If an employer is advised by or on behalf of a worker that the worker has an occupational illness or that a claim in respect of an occupational illness has been filed with the Workplace Safety and Insurance Board by or on behalf of the worker, the employer shall give notice in writing, within four days of being so advised, to a Director, to the committee or a health and safety representative and to the trade union, if any, containing such information and particulars as are prescribed.

[Occupational Health and Safety Act, s.52]


#### 4.7. Reporting Requirements

The following incidents must be reported as minimum at Bestco Construction Ltd.:


Type of Incident or Accident	Reported By	Reported to	When to report	How to Report
If a person, whether a worker or not, has been critically injured or killed at the workplace	Constructor, if any & Employer	MLITSD Inspector (Health & Safety Contact Centre)  JHSC/H&S Rep and the trade union, if applicable	Immediately	By telephone 1-877-202-0008 or direct means
	Employer	A Director of the MLITSD	Within 48 hours	In writing

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If an accident, explosion, or fire occurs, or if there is an incident of workplace violence, and a person is disabled or requires medical attention	Employer	A Director of the MLITSD (only upon request by an Inspector)  JHSC/H&S Rep and the trade union, if applicable	Within 4 days	In writing
If occupational illness or that a claim for an occupational illness has been filed with the Workplace Safety and Insurance Board	Employer	A Director of the MLITSD  JHSC/H&S Rep and the trade union, if applicable	Within 4 days	In writing
If the injured worker: <ul style="list-style-type: none"> <li>requires treatment from a health professional (beyond first aid), or</li> <li>is absent from, or</li> <li>earns less than regular pay</li> </ul>	Employer	WSIB	Within 3 days	In writing  (Form 7)
If a worker is injured at work or becomes ill because a job, or if a worker subsequently loses time from work due to a workplace injury/illness	Worker	Employer	Immediately	Verbally or in writing
	Worker	WSIB	As soon as possible (Within 6 months)	In writing  (Form 6)
If the injured worker:	Employer	WSIB	8th day of modified work.	In writing

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<ul style="list-style-type: none"> <li>• does not receive health care, and</li> <li>• requires modified work due to the injury or illness, and</li> <li>• has been doing modified work at regular pay for more than 7 days</li> </ul>				(Form 7)
<b>Serious Electrical Incidents</b> <ul style="list-style-type: none"> <li>• Any electrical contact that causes death.</li> <li>• Any electrical incidents that cause <b>critical injury</b>,</li> <li>• Any fire or explosion or any condition suspected of being electrical in origin which might have caused a fire, explosion, loss of life, critical injury to a person, or damage to property.</li> <li>• Any electrical contact with electrical equipment operating at over 750 volts. Any explosion or fire of electrical equipment operating at over 750 volts.</li> </ul>	Owner, Contractor, or operator of a facility	Electrical Safety Authority (ESA)	Within 48 Hours	Telephone  By telephone 1-877-372-7233 or 1-877-ESA-SAFE.
		MLITSD Health & Safety Contact Centre  JHSC/H&S Rep and the trade union, if applicable	Serious or critical injury - Immediately & written report in 48 hours  Non-critical or no fatality (4 days)	By telephone 1-877-202-0008 or direct means
<b>On a project site (where O. Reg. 213/91 applies)</b> as prescribed by the Occupational Health and Safety Act s. 51-53 and O. Reg 420/21: Notices and Reports Under Sections 51 to 53.1 of the Act – Fatalities, Critical Injuries, Occupational Illnesses and Other Incidents section 4(3)(2):	Constructor	JHSC/H&S Rep and the trade union, if applicable, and  A Director of the MLITSD	Immediately  Within 2 days	Telephone  In writing

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<ul style="list-style-type: none"> <li>• A worker falls a vertical distance of three metres or more</li> <li>• A worker falls and the fall is arrested by a fall arrest system other than a fall restricting system</li> <li>• A worker becomes unconscious for any reason</li> <li>• There is accidental contact by a worker or by a worker's tool or equipment with energized electrical equipment, installations, or conductors</li> <li>• There is accidental contact by a crane, similar hoisting device, backhoe, power shovel or other vehicle or equipment or its load with an energized electrical conductor rated at more than 750 volts</li> <li>• There is structural failure of all, or part of falsework designed by, or required by Ontario Regulation 213/91 (Construction Projects) to be designed by, a professional engineer</li> <li>• There is a structural failure of a principle supporting member, including a column, beam, wall, or truss, of a structure</li> <li>• There is a failure of all or part of the structural supports of a scaffold.</li> <li>• There is a structural failure of all or part of an earth-or water-retaining</li> </ul>				
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<p>structure, including a failure of the temporary or permanent supports for a shaft, tunnel, caisson, cofferdam, or trench</p> <ul style="list-style-type: none"> <li>• There is a failure of a wall of an excavation or of similar earthwork with respect to which a professional engineer has given a written opinion that the stability of the wall is such that no worker will be endangered by it or</li> <li>• There is an overturning or the structural failure of all or part of a crane or similar hoisting device</li> </ul>				
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#### 4.8. Written Reporting Information Requirements


In accordance with the reporting requirements set out in O. Reg. 420/21 s. 2 and 3, Bestco Construction Ltd. shall provide a written report or written notice if,

- A worker is killed or critically injured from any cause at a workplace as described in the subsection 51 (1) of the Act.
- A worker is disabled from performing his or her usual work or requires medical attention because of an accident, explosion, fire, or incident of workplace violence at a workplace, but no person dies or is critically injured because of that occurrence as described in subsection 52 (1) of the Act; or
- The employer is advised by or on behalf of a worker that the worker has an occupational illness or that a claim in respect of an occupational illness has been filed with the WSIB by or on behalf of the worker as described in subsection 52 (2) of the Act.

A written report/notice shall contain the following information:

- The name, address, and type of business of the employer.
- The name of the injured/ill worker.
- The nature of the bodily injury or occupational illness.
- For a written report involving a worker in the point a) above, the following information shall also be included:



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- the name and address of the constructor if the occurrence is at a project,
  - the address of the worker,
  - the nature and circumstances of the occurrence, including a description of any machinery, equipment or procedure involved,
  - the time, date, and place of the occurrence, and
  - the name and address of the legally qualified medical practitioner, registered nurse who holds an extended certificate of registration under the Nursing Act, 1991 or medical facility that is attending to or attended to the worker.
5. For a notice involving a worker in the point b) above, the following information shall also be included:
    - a. the nature and circumstances of the occurrence, including a description of any machinery, equipment or procedure involved, and
    - b. the time, date, and place of the occurrence.
  6. For a notice involving a worker in the point c) above, a description of the cause or suspected cause of the occupational illness.
  7. The names and addresses or other contact information of any witnesses to the occurrence.
  8. The steps taken to prevent a recurrence or further illness.

If the injured worker is an employee of a contracted company, the following documentation must also be completed by the contractor as the employer:


- Accident Investigation Report – One copy submitted to Bestco Construction Ltd.'s corporate office within 24 hours and one copy kept on site.
  - This form must include the personal contact information of the injured worker and the worker's supervisor.
  - This form must include the name and address of the attending physician. This report shall be submitted to management for the MLITSD submission.

#### **4.9. WSIB Reporting by Worker**

Report your injury or illness if:

- you need treatment from a health professional (beyond first aid), or
- you aren't able to go to work, or
- you are being paid less or receiving fewer hours of work

It is not required by **WSIB** to report your injury or illness if all three of the following apply:

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- you only needed first aid, and
- you did not take any time off work, and
- your pay was not affected

#### 4.10. WSIB Reporting by Employer


Bestco Construction Ltd. shall report a workplace injury or illness within three days of learning about it if your employee:

- needed treatment from a health professional, or
- was absent from work, or
- earns less than regular pay (e.g., working fewer hours or being paid less per hour).

A copy of the injury or illness report to be provided to the worker. Even if the worker doesn't need treatment from a health professional, their injury or illness must be reported, if they are doing modified work. This means any change in their regular job while recovering from an injury or illness for more than seven days (at regular pay). In this case, you must report on the eighth day of modified work.

The following document must be completed by the injured Worker's Employer:

- WSIB Form 7 – Employer's Report of Injury/Disease
  - a. This form must be submitted to WSIB within 3 business days of the accident.
  - b. This form establishes a claim through the WSIB.
  - c. This form is mandatory.
- The First Aider must complete the following document (if applicable):
  - First Aid Log
- The injured Worker must complete the following document (if applicable):
  - WSIB Form 6 – Worker's Report of Injury/Disease
    - a. Must be completed and remitted to WSIB within 6 months of the accident.
    - b. This form establishes a claim through WSIB.
    - c. This form is mandatory.
- The injured Worker's attending Physician must complete the following documents:
  - WSIB Form 8 – Health Professional's Report and Treatment Memorandum
    - d. This form must be completed upon the first visit to the Physician.

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- e. This form must be submitted to WSIB as soon as possible.
- f. This form is mandatory.

**Important:** If the incident results in lost time for the injured worker, Return to Work and Work Reintegration Program is activated. Please refer **BESTCO-PRO-13.4 - Return to Work and Work Reintegration Program**.

#### 4.11. Written Reporting Information Requirements: Accidents at Projects

In accordance with the reporting requirements set out in O. Reg. 420/21 s. 4, Bestco Construction Ltd. shall provide a written notice if,

1. an accident, premature or unexpected explosion, fire, flood or inrush of water, cave-in, subsidence or rock burst occurs at a project site, mine or mining plant as described in subsection 53 (1) of the Act;
2. the failure of any equipment, machine, device, article, or thing occurs at a project site, mine or mining plant as described in subsection 53 (1) of the Act that could have posed a risk to worker life, health, or safety; or
3. an incident prescribed under O. Reg. 420/21 s. 4. (3) occurs.


The written notice shall contain the following:

- The name, address, and type of business of the employer.
- For an occurrence at a project, the name and address of the constructor.
- The time, date, and place of the occurrence.
- The nature and circumstances of the occurrence, including a description of any machinery, equipment or procedure involved.
- The steps taken to prevent a recurrence.

[Occupational Health and Safety Act, s.53]

#### 4.12. Additional Notices

1. In accordance with section 5.(1) of O. Reg. 420/21, in cases that Bestco Construction Ltd. acts as constructor or employer who submits a written report to a Director under subsection 51 (1) of the Act or gives a written notice under section 52 or 53 of the Act shall also supplement the report or notice with a professional engineer's written opinion stating the cause of the occurrence if,
  - a. the incident occurs at a workplace where Ontario Regulation 213/91 (Construction Projects) made under the Act applies and involves a failure of all or part of,

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- temporary or permanent works,
  - a structure,
  - 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
  - a crane or similar hoisting device;
  - b. the incident occurs at a workplace where Ontario Regulation 67/93 (Health Care and Residential Facilities) made under the Act applies and involves the collapse or failure of a temporary or permanent structure that was designed by a professional engineer or architect; or
  - c. the incident occurs at a workplace where Regulation 859 of the Revised Regulations of Ontario, 1990 (Window Cleaning) made under the Act applies and involves the collapse or failure of a temporary or permanent support or structure that was designed by a professional engineer.
2. The professional engineer's written opinion shall be provided within 14 days after the occurrence.

#### 4.13. Records

The employer or constructor shall retain a copy of a written notice or report required under sections 51 to 53.1 of the Act for at least three years after the date the notice or report is made.

#### 4.14. Electronic form


MLITSD Form - ON00276E (2021/07) Report of a workplace fatality, injury, illness, or incident (OHSA s. 51, 52, 53) shall be completed electronically and provided to all interested parties in the following conditions:

Under OHSA section 51:

- A fatality or critical injury

Under OHSA section 52:

- A person is disabled from doing their usual work or required medical attention due to an accident, explosion, fire, or an incident of workplace violence

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- A current or former worker has an occupational illness or a claim of an occupational illness has been filed with the Workplace Safety and Insurance Board

Under OHSA section 53 and section 4 of O. Reg. 420/21:

An incident described in section 53 of the OHSA or subsection 4(3) of O. Reg. 420/21 that occurred:

- at a construction project

#### **4.15. Incidents/ Accidents Resulting in Property Damage Only**

If an accident occurs which results in property damage only, the witness is to immediately contact the Project Supervisor. Immediately following, the Project Supervisor must complete the following document:

- Incident Investigation Report One copy must be kept on site. An additional copy must be sent to the corporate office for record keeping or added to **4SafeCom™**.

#### **4.16. Near Miss Incidents with Property Damage or Injury Potential**

If an incident occurs which jeopardizes the safety of a worker or has the potential to cause damage to any property, the first witness must first notify the Project Supervisor. Immediately following, the Project Supervisor must complete the following document:


- Incident Investigation Report: One copy must be kept on site; an additional copy must be sent to the corporate office for record keeping or added to **4SafeCom™**.

#### **4.17. Workplace Violence and Harassment**

If an incident occurs regarding workplace violence and harassment, supervisors (with the help of the JHSC or site H&S Representative, if required) must investigate using the **Workplace Violence and Harassment Investigation Form**.

- Please refer to **BESTCO-PLY-13.2 - Workplace Violence and Harassment Policy** and **BESTCO-PRO-13.3 - Workplace Violence and Harassment Procedure** for further details and required forms.

#### **4.18. Basic Investigation Procedure**


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The following are procedures to be followed in the event of a workplace incident/accident that requires an investigation:

1. Whenever possible the investigator should secure the accident scene by marking off area to ensure that the area and evidence is not disturbed.
2. Do not allow similar work to continue until the investigation is completed and corrective actions are in place.
3. Notify management/head office and if on site, the client and constructor immediately.
4. The supervisor must:
  - Assess the scene: Inspect equipment/ material that was involved in the incident/accident. Ensure to use drawings, sketches and take photographs of the incident/accident scene indicating sizes, distances, and weights of objects.
  - Interview: Ensure to interview any witnesses, people involved. Interviewing should be conducted as soon as possible by the person conducting the investigation (supervisor) and shall be conducted in a private place, away from any commotion. The witness' statement shall be documented as you conduct the interview.
  - Root cause: Determine the root cause of the accident/incident and implement corrective actions to prevent the incident from reoccurring. As incidents are seldom the result of a single factor, the investigator is to attempt to identify all contributing factors to control the probability of recurrence. Identification of root causes taking into consideration the following factors that may have acted alone or interacted with one another such as:
    1. People
    2. Equipment
    3. Material
    4. Environment
    5. Process

The investigator (supervisor) is to provide a complete **Accident/Incident Investigation Form** and witness statement(s) to senior management team for review and distribution.

The final investigation reporting package should be as detailed as possible and include all photos, interviews, and diagrams taken in the investigation. The investigator will need to ensure that the reporting package and/or **Accident/Incident Investigation Form** includes:

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- Who was involved, who witnessed when it happened, where it happened?
- Description of what happened (sequence of events)
- List of machines/equipment or materials involved.
- Record all corrective and preventative actions taken and complete a follow-up post-accident to ensure measures are being accepted.
- Information about the work procedures and training provided
- Sign off by the investigators and the management who reviews the report
- Sign off by the H&S Worker representative (if applicable)

#### **4.19. Training and Communication**

All supervisors and health and safety representatives who may be required to investigate an accident/injury will be trained in incident investigation and reporting procedures, including legislative reporting requirements. Training records will be retained to ensure all supervisors have been trained. The training will occur during initial orientation for new hires, during designated formal training sessions for existing workers, periodic safety training sessions and safety talks. Training will also occur on a periodic basis during refresher training sessions and periodic safety meetings.


Bestco Construction Ltd. understands the importance of workers' rights (Right to know, Right to Participate, and the Right to Refuse). Management will ensure ALL workers are aware of the company's incident reporting procedures. The Incident Investigation Policy will be communicated to all workers by means that includes but not limited to, new hire orientation training, health & safety binder, sample incident reports, and incident investigation formal training sessions. Investigation results and corrective and preventative actions will be communicated to interested parties.

#### **4.20. Root Cause Analysis (RCA)**

Bestco Construction Ltd.'s investigation team must determine the OHS deficiencies by first conducting an effective root cause analysis of an incident to determine the reason why it took place. This is done through the root cause analysis (RCA). The basic steps of RCA are as follows:

1. Define the problem (accident/incident/event).
2. Gather all information and data.
3. Identify any issues (causal factors) that contribute to the problem.
4. Determine root cause.
5. Identify recommendations to prevent recurrence
6. Implement the necessary solutions.



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To identify causal factors, ask:

- What sequence of events led to the event?
- What conditions allowed the event to occur? (Environment, work organization, human error, etc.)
- What problems co-exist with the event might contribute to it? (Lack of training, signage, visibility etc.)

Several techniques and methods could be used to identify the root cause. Our method to identify root cause involves a team of competent investigators brainstorming causal factors after gathering all information and data from the scene, witnesses etc. The 5 Whys or fish bone diagram approach will be used to identify causal factors and assist in determining the root cause.


#### **4.21. Corrective Actions and Preventative Actions (CA/PA)**

All accident/incident reports will be reviewed to prioritize incidents and make recommendations for corrective and preventative actions. These CA/PA actions will be communicated to the Senior Management. The Senior Management will determine if any corrective actions can be implemented, if so, when, and how. Management will make sure all corrective actions and preventative actions are implemented in a timely manner. Records will be kept ensuring actions are taken in a timely manner and to assess their effectiveness. The Management must allocate the resources for the accident/incident investigation to conduct root cause analysis, develop corrective and prevention action plan as per the responsibilities of investigative team in regard to the timeline. Once an investigation has been completed, the findings shall be communicated to relevant stakeholders within the organization, and to external parties as necessary (i.e., contractors working in the area or on equipment where the incident occurred). These records of communication will also be retained to ensure all workers have been notified and are aware the changes made.

Bestco Construction Ltd.'s Senior Management is responsible for following up and measuring the effectiveness of the corrective and preventative actions. This will be done on an ongoing basis, during monthly JHSC meetings, and semi-annual senior management review meetings.

#### **4.22. Record Maintenance**



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All records related to incident reporting and investigation will be maintained in **4SafeCom™**.

## 5 Roles and Responsibilities

Responsibilities and accountabilities of workplace parties ensures a commitment by workplace parties ensuring a safe and healthy work environment. The responsibilities of workplace parties are outlined as per the Organization Chart and listed below with the specific roles within the organization.

### 5.1. Senior Management


- Allocating resources and assigning investigators.
- Ensure to report the incidents to applicable parties as required.
- Review investigation reports.
- Ensure that the incident investigation is completed immediately in the case of reportable incidents upon notification of injury.
- Accountable to implement necessary corrective and preventative actions.
- Follow up on corrective and preventative actions to ensure effectiveness.
- Ensure all supervisor/ foreman, JHSC members and/ or Health and Safety Representatives receive training about incident investigation and reporting procedures.
- Ensure all workers are aware of the incident investigation and reporting procedures.
- Communicate results to all relevant workplace parties of all reportable incident investigations and actions taken.
- Retain records of incident reporting and investigation results.

### 5.2. Supervisors

- Participate in all initial incident investigations.
- Ensure to report the incidents to applicable parties as required.
- Complete the **Accident/Incident Investigation Form**.
- Recommend corrective and preventative actions to Senior Management.
- Support Management in measuring the effectiveness of corrective and preventative actions.

### 5.3. Joint Health and Safety Committee (JHSC) (If Applicable)

- Participate in all initial incident investigations.

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- Recommend corrective and preventative actions to supervisors.
- Review all accident/incident reports during JHSC meetings.

#### 5.4. Workers


- Understand and acknowledge the Incident Investigation Policy and Procedure.
- Follow the reporting as required.
- Receive training on reporting and identifying incidents and near misses.
- Report all incidents regardless how small they might be to direct supervisor.
- Participate in the incident investigation where required or requested by supervisor. This includes any requests for witness statements.
- Report, record and submit near misses to direct supervisor.
- Review corrective and preventative actions as provided by management.

## 6 Related Documents/Forms

- BESTCO-PRO-01.2 - Document and Record Control Procedure
- BESTCO-PLY-10.0 - Investigations and Reporting Policy
- BESTCO-PLY-13.2 - Workplace Violence and Harassment Policy
- BESTCO-PRO-13.3 - Workplace Violence and Harassment Procedure
- BESTCO-PRO-13.4 - Return to Work and Re-Integration Procedure
- MLITSD Form - ON00276E (2021/07) Report of a workplace fatality, injury, illness, or incident (OHSA s. 51, 52, 53)
- Accident/Incident Investigation Form
- Incident Tracker (Corrective Action /Preventative Action/ Effectiveness Verification Form)
- WSIB - Worker's report of injury/disease (Form 6)
- WSIB - Employer's Report of Injury/Disease (Form 7)
- WSIB - Health Professional's Report (Form 8)
- Notification of Incident
- Training Records/Certificates
- First Aid Log

## 7 Document and Record Maintenance

Documents and Records are maintained as per **BESTCO-PRO-01.2-Document and Record Control Procedure**.


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## 8 Record Retention

Records are to be retained for a minimum of 3 years. Records will remain legible and readily identifiable.

## 9 Legislated/Other References

- Duties of constructors – Occupational Health and Safety Act, s. 23
- Duties of employers – Occupational Health and Safety Act, s. 25, 26
- Duties of supervisors – Occupational Health and Safety Act, s. 27
- Duties of workers – Occupational Health and Safety Act, s. 28
- Health and Safety Representative – Occupational Health and Safety Act, s. 8
- Joint Health and Safety Committee – Occupational Health and Safety Act, s. 9
- Occupational Health and Safety Act, PART VII – NOTICES s.51-53.1
- O. Reg. 420/21: Notices and Reports Under Sections 51 to 53.1 of the Act – Fatalities, Critical Injuries, Occupational Illnesses and Other Incidents – Ontario Occupational Health and Safety Act
- O. Reg. 1101: First Aid Requirements under Workplace Safety and Insurance Act
- O. Reg. 456/97: Functional Abilities Form under Workplace Safety and Insurance Act
- Workplace Safety and Insurance Act (WSIA), Part IV – Healthcare – s.38 – Transportation to hospital

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## Emergency Preparedness Policy

Bestco Construction Ltd. is committed to maintaining the safety of all employees and personnel on site during emergency situations. Emergency response plans shall be developed for potential emergency situations that are identified through the hazard assessment process. Senior management will review the process and effectiveness of emergency response drills annually.

Senior management is committed to providing the time, budget, and resources for ensuring prompt and effective implementation of the Emergency Preparedness program.

The program and its performance shall be reviewed annually for sustainability, adequacy, and effectiveness.




Name: Michael Zaborsky

Title: President

Company: Bestco Construction (2005) Ltd.


Sept. 2, 2025

Date: 02 September, 2025

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# Emergency Preparedness Procedure

<b>Version No.</b>	<b>Reason for Revision:</b>	<b>Developed By and Date:</b>	<b>Reviewed By and Date:</b>	<b>Approved By and Date:</b>
1	To meet COR 2020 Standards, company's health and safety processes and Ontario's Health and Safety Legislative Requirements.	Emma Lisson, Health and Safety Coordinator 11 July, 2025	Michael Zaborsky and Ovidiu Cotiga, Senior Management 18 August, 2025	Michael Zaborsky, President 02 September, 2025

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## 1 Purpose

To provide direction and to identify the resources required to respond in an event of an emergency at a workplace under the control of the organization.

## 2 Scope

This procedure applies to all Bestco Construction Ltd. workplace parties at a workplace under the control of the organization. The procedure covers the most appropriate responses to hazards identified through the organization's hazard assessment process.

## 3 Definitions

**Assembly Area:** A portion of the site that's designated as the meeting point all site personnel must evacuate to in the case of an emergency situation. A site may have more than one assembly area to accommodate all personnel on site and these assembly areas are noted on the Emergency Response Plans.

**Competency:** A person performing a task for, or on behalf of, the organization is competent to do so by means of appropriate:

- Knowledge of the hazards and risks associated with the tasks for the operations and activities.
- Demonstrated understanding and working knowledge of the control measures associated with the hazards and risks.
- Training regarding the hazards, risks, and associated control measures
- Aptitudes, such as skillset, ability, and willingness to deal with the hazards, risks, and control measure.

[Ref. COR 2020 Audit Handbook].


**Competent Person:** A person who,

- is qualified because of knowledge, training, and experience to organize the work and its performance,
- is familiar with this Act and the regulations that apply to the work, and
- has knowledge of any potential or actual danger to health or safety in the workplace.

[Ref. OHSA].

**Competent Worker:** In relation to specific work, means a worker who,

- is qualified because of knowledge, training, and experience to perform the work,

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- b) is familiar with the Occupational Health and Safety Act and with the provisions of the regulations that apply to the work, and
  - c) has knowledge of all potential or actual danger to health or safety in the work.
- [Ref. O. Reg. 213/91: Construction Projects under OHSA].

**Corrective Action:** Action to eliminate the cause of a non-conformity and to prevent recurrence. There can be more than one cause for a non-conformity. Document: Medium containing information related to the OHSMS. [Ref. COR 2020 Audit Handbook].

**Document:** Medium containing information related to the OHSMS. [Ref. COR 2020 Audit Handbook].

**Emergency:** A present or imminent situation that requires prompt action to prevent or limit

- a) critical injury (as defined by the OHSA) of a member of the project team, including a worker, sub-trade, or a member of the public;
- b) major disruption to operations (i.e., natural causes, fire/explosion, equipment failure, utility contact/damage, structural collapse, chemical spill, strike or work stoppage, power failure);
- c) serious damage, theft, or destruction, of vital records (i.e., information that is essential for the continuation of daily operations, or which contains information which is essential to recreate the organization's legal & financial position and preserve its rights and those of its employees, customers, and stakeholders) or property (i.e. equipment, tools, materials, or office equipment and supplies); and/or,
- d) workplace violence causing injury to a worker, sub-trade, or public; and/or causing damage, or destruction of company records and/or property.


**Emergency Access and Egress Routes:** Routes that are to be utilized by personnel during the evacuation of the job site and/or by emergency services to access an accident/crisis scene. These are noted on the Emergency Response Plans.

**Employer:** A person who employs one or more workers or contracts for the services of one or more workers and includes a contractor or subcontractor who performs work or supplies services and a contractor or subcontractor who undertakes with an owner, constructor, contractor, or subcontractor to perform work or supply services [Ref. OHSA].

**Hazard:** Source, situation, or act with a potential for harm in terms of human injury. [Ref. COR 2020 Audit Handbook].

**Health and Safety Representative:** A worker that brings awareness to safety concerns and facilitates communication between the constructor, supervisor, and the workers



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regarding safety. In workplaces, including construction projects, at which the number of workers regularly exceeds five and at which no joint health and safety committee is required. [Ref. OHSA].

**Incident:** Work related event(s) in which an injury, fatality or occupational illness occurred; and includes event(s) where no injury or illness occurred, such as a near hit or property damage. [Ref. COR 2020 Audit Handbook].

**Interested Parties:** Persons or groups, inside or outside the workplace, concerned with or affected by OHS performance of an organization. [Ref. COR 2020 Audit Handbook].

**Joint Health and Safety Committee (JHSC):** An advisory body composed of worker and management representatives that are committed to improving health and safety conditions in the workplace. A joint health and safety committee is required at workplace,


- a) at which twenty or more workers are regularly employed.
- b) with respect to which an order to an employer is in effect
- c) other than a construction project where fewer than twenty workers are regularly employed, with respect to which a regulation concerning designated substances applies
- d) at a workplace, other than a construction project where fewer than twenty workers are regularly employed, with respect to which a regulation concerning designated substances applies

This requirement does not apply to a constructor at a project at which work is expected to last less than three months. [Ref. OHSA].

**Legal Requirements:** All applicable legislation, including but not limited to the Occupational Health and Safety Act and its regulations. [Ref. COR 2020 Audit Handbook].

**Occupational Health and Safety (OHS):** Conditions and factors that affect or could affect the health and safety of employees or other workers, inclusive of temporary workers and contractor personnel, visitors, suppliers, vendors, or any other person in the workplace. [Ref. COR 2020 Audit Handbook].

**Occupational Health and Safety Management System (OHSMS):** As defined in the OHSA “means a coordinated system of procedures, processes and other measures that is designed to be implemented by employers to promote continuous improvement in occupational health and safety. [Ref. COR 2020 Audit Handbook].

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**Organization:** Company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public, or private, that has its own functions, management, and administration. [Ref. COR 2020 Audit Handbook].

**Other Requirements:** Requirements or provisions the organization subscribes, however are not legally binding, such as industry standards. [Ref. COR 2020 Audit Handbook].

**Participation:** Involvement of workers, or worker representatives, in decision-making process(es) regarding the OHSMS. [Ref. COR 2020 Audit Handbook].

**Plan:** Detailed method for doing or achieving something. [Ref. COR 2020 Audit Handbook].

**Owner:** Includes a trustee, receiver, mortgagee in possession, tenant, lessee, or occupier of any lands or premises used or to be used as a workplace, and a person who acts for or on behalf of an owner as an agent or delegate. [Ref. OHSMA].

**Participation:** Involvement of workers, or worker representatives, in decision-making process(es) regarding the OHSMS. [Ref. COR 2020 Audit Handbook].


**Plan:** Detailed method for doing or achieving something. [Ref. COR 2020 Audit Handbook].

**Policy:** A policy is a general commitment, direction or intention and is formally stated by top management. A quality policy statement should express top management's commitment to the implementation and improvement of its management system. [Ref. COR 2020 Audit Handbook].

**Preventative Action:** Action to eliminate the cause of potential non-conformity or other potential undesirable potential situation. There can be more than one cause for a potential nonconformity. (For the purposes of this Standard, this refers to any action taken to fix a potential OHS problem.) [Ref. COR 2020 Audit Handbook].

**Procedure:** A documented, specified method to carry out an activity. **Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].

**Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].

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**Project:** a construction project, whether public or private, including,

- a) the construction of a building, bridge, structure, industrial establishment, mining plant, shaft, tunnel, caisson, trench, excavation, highway, railway, street, runway, parking lot, cofferdam, conduit, sewer, watermain, service connection, telegraph, telephone or electrical cable, pipe line, duct or well, or any combination thereof,
- b) the moving of a building or structure, and
- c) any work or undertaking, or any lands or appurtenances used in connection with construction.

[Ref. OHSA].

**Record:** Document stating results achieved or providing evidence of activities performed.

[Ref. COR 2020 Audit Handbook].

**Residual Risk:** Combination of the likelihood of the occurrence after the hierarchy of controls has been implemented for an identified hazard [Ref. COR 2020 Audit Handbook].

**Risk:** Combination of the likelihood of an occurrence of a hazardous event or exposure(s) and the severity of injury or occupation illness that can be caused by the event or exposure(s) [Ref. COR 2020 Audit Handbook].


**Risk Assessment:** Process of evaluating the risk(s) arising from a hazard(s), taking into account the adequacy of any existing controls, and deciding whether or not the risk(s) is acceptable [Ref. COR 2020 Audit Handbook].

**Senior Management (Company President, Vice President of Operations):** Person(s) at the highest level of an organization's structure responsible for leading, managing and /or directing an organization's day-to-day activities and/or operations. [Ref. COR 2020 Audit Handbook].

**Subcontractor:** A person or organization that takes a portion of a contract from the principal contractor or from another subcontractor.

**Supervisor:** A person who has charge of a workplace or authority over a worker [Ref. OHSA].

**Supplier:** A person who supplies any machine, device, tool or equipment under any rental, leasing, or similar arrangement for use in or about a workplace. [Ref. OHSA].

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**Worker:** Any of the following, but does not include an inmate of a correctional institution or like institution or facility who participates inside the institution or facility in a work project or rehabilitation program:

- a) A person who performs work or supplies services for monetary compensation.
- b) A secondary school student who performs work or supplies services for no monetary compensation under a work experience program authorized by the school board that operates the school in which the student is enrolled.
- c) A person who performs work or supplies services for no monetary compensation under a program approved by a college of applied arts and technology, university, private career college or other post-secondary institution.
- e) Such other persons as may be prescribed who perform work or supply services to an employer for no monetary compensation.

[Ref. OHSA].

**Workplace:** any land, premises, location, or thing at, upon, in or near which a worker works. [Ref. OHSA].

**Workplace Parties:** Includes, but is not limited to, the employer, supervisor(s), workers, constructor, visitors, and owner. [Ref. COR 2020 Audit Handbook].

## 4 Procedure


Bestco Construction Ltd. is committed to maintaining the safety of all employees and personnel on site during emergency situations. An Emergency Response Plan (ERP) shall be developed for each workplace under the control of Bestco Construction Ltd. and shall be maintained specifically for each location. Plans may be subject to updates due to new Legislated requirements, standards, industry best practices, or corrective actions from prior drills of the ERP. Any additions, deletions, or changes to the workplace specific ERP shall be communicated to all interested parties/stakeholders.

### 4.1. Emergency Response Plans

Office/Shop/Warehouse/Yard Emergency Response Plans shall be developed by Health and Safety Coordinator using the **Emergency Response Plan Form**.

During site setup, the supervisor must develop a plan to reflect the specifications of the job site using the **Emergency Response Plan Form**.

The plans need to be developed using the input of relevant interested parties like subcontractors, clients, neighbours, and emergency services. This plan must include:

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- A list of workers along with their contact information who will be responsible in emergency situations.
- A description of potential emergencies that could occur on site.
- A method of reporting the emergency (i.e., telephones)
- A system for communication to all employees, internally and externally (i.e., two-way radios, telephones, alarms, etc.)
- Prevention and minimization of injuries and occupational illnesses for identified emergency situations
- Creating a Site Emergency Map, outlining the Safe perimeter in event of evacuation, emergency access and egress routes on-site, location of emergency equipment, first aid station, eyewash stations, fire extinguishers with specifications (4A40BC 20lb dry powder), etc.
- Implementation of an alarm system (tested periodically), that will signal to all on-site personnel that an emergency is in progress.
- An evacuation, head count and rescue plan, which is only attempted by trained personnel.
- A list of emergency contact numbers.
- Specific roles and responsibilities of relevant employees during emergencies.

Once developed, the plan must be approved by senior management and the plan must be communicated during the new hire orientation/site orientation/visitor orientation of all interested parties. This includes inputs from workers, visitors, contractors, emergency response services, government authorities and the community regarding emergency response. The plan must be visibly posted on the site safety board.

The emergency response plans and procedures need to be periodically reviewed whenever there is a change or at least annually and revised as appropriate.

#### 4.2. Testing

At the office/shop/ or any buildings, the ERP must be tested at least annually. Site supervisors must test their ERP at least once during the duration of a project if the project will exceed one year, and if the site constructor does not have a site ERP in place. This could be done by means of a fire drill/mock evacuation. The test can be documented using the **Emergency Evacuation Drill Form** and **Toolbox talk Form** as may be appropriate. Deficiencies will be documented, and corrective actions will be taken. Alarms, Two-way communication, emergency lighting shall be tested monthly.

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#### 4.3. Emergency Response Systems

Each workplace under the control of Bestco Construction Ltd. shall have its own emergency evacuation plan and emergency systems.

##### (a) Emergency Response Equipment

Emergency response equipment must be in place, well-marked, regularly inspected and maintained. All emergency equipment (first aid kits, eyewash stations, AED equipment, rescue ladders, breathing apparatus, etc.) must be inspected as part of monthly inspection (Monthly Inspection Form) and maintained as per the manufacturer's guideline. Labels must be initialled as appropriate as part of inspection. Fire extinguishers must be inspected monthly and annually by a third party.

##### (b) Emergency Communication

All facilities and worksites will be equipped with two-way emergency communication systems such as radios, cellphones, telephones, and other means of communication as air-horns, fire alarms et al. All workers must be aware of the location the emergency communication device(s) used in their work area.


##### (c) Fire Exits

Each workplace shall have at least two exit routes for workplace parties to escape in event of an emergency. It is the responsibility of each workplace party to be familiar with the location of fire exits in their vicinity, ensure they are marked and not blocked at any time.

Emergency lights will be installed throughout all floor areas, including directly above each of the emergency exits. If a power failure should occur to the entire building, the emergency lights should provide sufficient light for evacuation for 30 minutes.

##### (d) Assembly Area/ Muster Point

Each worksite and facility shall have an established muster point where individuals need to gather in the event of an emergency evacuation. The muster point is identified on the Health & Safety Board and must be communicated to workers at each location. The ERP Coordinator will take roll call attendance at the muster point.

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(e) Emergency Response Team

The following resources are needed as a minimum to implement the emergency response plans. There may be more workplace parties identified depending on the site specifics, etc.

ERP Coordinator:

The ERP Coordinator is authorized to co-ordinate all activity and take all necessary actions to deal with a hazardous incident. The ERP Coordinator will be selected for each location and will consist of management and workers of Bestco Construction Ltd.

Qualified First Aid Responders:

The First Aid Team is responsible to administer first aid that may be necessary during an emergency at the site.

(f) First-Aid Requirements


(i) First Aid Stations

All company locations must have a first aid station. First aid stations must be positioned in a conspicuous location and accessible to everyone.

A first aider as prescribed in O. Reg. 1101 station is in the charge of the first aid station.


No. of Workers	First Aid Station Requirements	First Aid Kit/Box Requirements
0 to 5	<ul style="list-style-type: none"> <li>• Current edition of the St. John's Ambulance First Aid Manual</li> <li>• Current edition of Reg.1101</li> <li>• First aid kit inspection form</li> <li>• First aid log</li> <li>• First aider's certificate</li> <li>• Form 82</li> </ul>	<ul style="list-style-type: none"> <li>• 1 card of safety pins</li> <li>• 12 adhesive dressings individually wrapped</li> <li>• 4 sterile gauze pads, 3 inches wide</li> <li>• 2 rolls of gauze bandage, 2 inches wide</li> <li>• 2 field dressings, 4 inches square or 2 four-inch sterile bandage compresses</li> </ul>



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No. of Workers	First Aid Station Requirements	First Aid Kit/Box Requirements
		<ul style="list-style-type: none"> <li>• 1 triangular bandage</li> <li>• Non-latex gloves in varying sizes</li> <li>• CPR Masks</li> </ul>
6 to 15	<ul style="list-style-type: none"> <li>• Current edition of the St. John's Ambulance First Aid Manual Current edition of Reg.1101</li> <li>• First aid kit inspection form</li> <li>• First aid log</li> <li>• First aider's certificate</li> <li>• Form 82</li> </ul>	<ul style="list-style-type: none"> <li>• 1 card of safety pins</li> <li>• 24 adhesive dressings individually wrapped</li> <li>• 12 sterile gauze pads, 3 inches wide</li> <li>• 4 rolls of 2-inch gauze bandage</li> <li>• 4 rolls of 4-inch gauze bandage</li> <li>• 4 sterile surgical pads suitable for pressure dressings, individually wrapped</li> <li>• 6 triangular bandages</li> <li>• 2 rolls of splint padding</li> <li>• 1 roll-up splint</li> <li>• Non-latex gloves in varying sizes</li> <li>• CPR Masks</li> </ul>
16-199	<ul style="list-style-type: none"> <li>• Current edition of the St. John's Ambulance First Aid Manual</li> <li>• Current edition of Reg.1101</li> <li>• First aid kit inspection form</li> <li>• First aid log</li> <li>• First aider's certificate</li> <li>• 1 stretcher</li> <li>• 2 blankets</li> <li>• Form 82</li> </ul>	<ul style="list-style-type: none"> <li>• 24 safety pins</li> <li>• 1 basin, preferably stainless steel</li> <li>• 48 adhesive dressings individually wrapped</li> <li>• 2 rolls adhesive tape, 1 inch wide</li> <li>• 12 rolls of 1-inch gauze bandage</li> <li>• 48 sterile gauze pads, 3 inches square</li> </ul>



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No. of Workers	First Aid Station Requirements	First Aid Kit/Box Requirements
		<ul style="list-style-type: none"> <li>• 8 rolls of 2-inch gauze bandage</li> <li>• 8 rolls of 4-inch gauze bandage</li> <li>• 6 sterile surgical pads suitable for pressure dressings, individually wrapped</li> <li>• 12 triangular bandages</li> <li>• Splints of assorted sizes</li> <li>• 2 rolls of splint padding</li> <li>• Non-latex gloves in varying sizes</li> <li>• CPR Masks</li> </ul>


(ii) First Aid Training Requirements

The company shall ensure that the appropriate number of qualified first aiders as per the Regulation shall be present at each site. The Ontario workplace first aid requirements are outlined by the WSIB in O. Regulation 1101. The regulation summarizes the type of certificate, required by an employer based on the number of employees per shift.

Number of Employees per Shift	Type of Certificate
1 to 5	<a href="#">Emergency First Aid</a> (One day)
6 to 15	<a href="#">Standard First Aid</a> (Two days)
16 to 199	<a href="#">Standard First Aid</a> (Two days)

(iii) First Aid Treatment Log

The First Aid Log will be maintained by the first aid attendant(s) and will be used to document first aid treatment or advice provided by the first

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aid attendants in their work areas. The First Aid Log must be completed by the attendant each time an employee receives first aid treatment, regardless of how minor the injury.

The following information will be entered in the log:

- Date & time of report
- Injured worker's name
- Location (Where did it happen i.e., parking lot)
- Circumstances (how did it happen?)
- What caused the injury? (i.e., slippery floor, sharp object etc.)
- Name of witnesses
- Description of Injury (body part, location, etc.)
- Treatment administered
- Name of first aider

(iv) **Naloxone Kits:**

Where Bestco Construction Ltd. employees becomes aware, or ought reasonably to be aware, that there may be a risk of a worker having an opioid overdose at a workplace where that worker performs work for the employer, or where the prescribed circumstances exist, the employer shall provide and maintain in good condition a naloxone kit in that workplace.

a) **Risk Assessment**


Bestco Construction Ltd. shall conduct a risk assessment using the **Opioid Risk Assessment Form** to examine the risk of an opioid overdose at all applicable location(s). If a risk is present at one or more locations, Bestco Construction Ltd. shall provide and maintain a naloxone kit in the affected workplace(s).

b) **Location of Naloxone Kit**

Bestco Construction Ltd. shall ensure a naloxone kit is in the charge of a worker who works in the vicinity of the kit and who has received the training, if applicable.

c) **Training – Opioid Exposure and Administration of Naloxone kit**

Bestco Construction Ltd. shall provide training to recognize an opioid overdose, to administer naloxone and to acquaint the worker with any hazards related to the administration of naloxone, if applicable.

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d) Limit on disclosure

Personal information that is not deemed necessary shall not be disclosed to any person.

e) Provision and Maintenance

Bestco Construction Ltd. shall ensure that the following requirements respecting the provision and maintenance of naloxone kits are prescribed:

1. Every naloxone kit shall be used, stored and maintained in accordance with the manufacturer's instructions.
2. The contents of each naloxone kit must be kept in a hard case.
3. The contents of each naloxone kit must be for a single use and promptly replaced after such use.
4. The contents of each naloxone kit must not have expired.
5. The names and workplace locations of the workers who are in charge of the naloxone kit in the workplace and who have received the training shall be posted in a conspicuous place in the vicinity of the kit where their names and workplace locations are most likely to come to the attention of other workers.


(v) Emergency Eye wash/Shower Facility

Emergency eyewash/shower facility shall be located in a prominent area at office/shop/ where a worker is required to work with, or is likely to be exposed to, a hazardous biological or chemical agent that could cause injury to the eye or skin.

The following shall be made available, as applicable.

- Eye wash facilities.
- Emergency showers.
- Antidotes, flushing fluids or washes.

The emergency equipment must,

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- be clearly marked with a sign or label;
- be located or installed in a conspicuous place near where the hazardous biological or chemical agent is kept or used;
- be readily accessible to workers; and
- have instructions for its use displayed on the equipment or treatment or as near to it as is practical.

(vi) **Provision to Transport Injured Workers**

Supervisor at the sites and the office manager will ensure that a vehicle is always available for transporting any injured worker to a medical facility.

An ambulance shall be the preferred method of transportation to a hospital.

The company will make alternative arrangements should this method of transportation not be appropriate. In this event, the injured worker will be accompanied by a first aid attendant or designate.

#### **4.4. Emergency Response Training**


Employees at the office and shop will be trained in the emergency response plan during their orientation. Employees on site will be trained in the emergency response plan during their site orientation by site supervisor.

A worker who may be exposed to a biological, chemical, or physical agent that may endanger the worker's safety or health shall be trained in the proper use of emergency measures and procedures.

Workers that perform specialized tasks during execution of the ERP will receive adequate specialized training for their role. The type of training provided to workers and those with specific roles in an ERP must be relevant to the potential identified emergencies. Site level management has authority to decide which training is required, based on the unique potential emergency situations at each respective location.

The following outlines the training requirements to safely respond to emergency situations on site:

- Workers who may oversee spill response will be required to complete Spill Response training.

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- Workers who may be required to use a fire extinguisher will be trained by completing Fire Extinguisher training.
- At least one employee from each work area per shift will receive First Aid/CPR “A” + AED training in accordance with the recommendations provided by St. John Ambulance, Red Cross or equivalent and in accordance with Regulation 1101. Additional staff will be appointed to cover each shift in case of absences or if the designated first responder is the one who is injured/ill. The trained employee will act as the first aid attendant for the first aid station in their respective shift/workplace. The trained employees must have their certificate posted on the first aid kit or health and safety board.

#### 4.5. Communication

All workplace parties (workers, visitors, contractors) will have access to the ERP for the workplace where they work for their awareness. All new employees shall receive orientation on the ERP, and their roles and responsibilities during an emergency response via the site orientation process.

Workplace specific ERPs shall be posted at designated areas/ safety board at each workplace. The only controlled copy of an approved ERP that can be considered as valid are those located at designated areas at each facility.


As a best practice, emergency response plans shall be exchanged with clients, contractors, emergency response services, government authorities and the community if the project duration is more than 3 months. In the case of an emergency, and when acting as a subcontractor, all company employees must be aware of and follow all emergency protocols outlined by Local Emergency Services and main contractor.

#### 4.6. Potential Emergencies

Recommended responses for some potential emergencies (determined by completed hazard assessments and general emergency situations) are outlined below. All emergency responses will be led by the Emergency Response Team.

##### (a) Medical Emergency

1. Evaluate the incident area to ensure that it is safe for you.
2. Do not move the victim unless greater danger exists.
3. The first aider must provide first aid if required.
4. Alert supervisor or the nearest trained first aider.

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5. Contact 911 or provide immediate transportation to medical aid.
6. Ensure a report form or investigation form is filled out as required.
7. Report to the WSIB or Ministry of Labour, Immigration, Training and Skills Development (MLITSD) as required.

(b) Power Failure

1. Evaluate the area to ensure that it is safe.
2. It is important to stay at one location during a power failure.
3. If necessary due to hazards within the building, exit the building and proceed to the muster point.
4. One employee will be designated to contact management (if not on-site) to inform them of the power failure.
5. Identify and evaluate the source of the power outage.
6. Contact the utility contractor responsible for the power outage to report the outage.

(c) Gas Leak

1. Evacuate the area to an upwind location.
2. Identify and evaluate any injuries.
3. If required, contact 911 by sending someone to the nearest phone, or provide immediate transportation to the doctor's office or hospital as required.
4. Contact the utility contractor responsible for the equipment causing the leak.


(d) Building/Structure Collapse

(i) IF IN THE COLLAPSED BUILDING:

1. If you are not trapped by the building collapse, free yourself as quickly as possible and move to a safe area away from the collapsed area.
2. If you are trapped by the building collapse, make as much noise as possible to alert other personnel on site.
3. Contact 911 for immediate assistance or provide immediate transportation to the doctor's office or hospital as required.

(ii) IF COLLAPSED BUILDING IS OBSERVED:

1. Call 911 immediately.

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2. Do not attempt to enter the area.
3. Report your observations to the site supervisor and responding emergency personnel.

(e) Mobile Equipment Failure

(i) IF WORKING AROUND FAILING EQUIPMENT:


1. Move personnel to a safe zone.
2. Move surrounding equipment out of the way.
3. Maintain two-way communication with operator and assist in navigating equipment.
4. Refer to manufacturer's instructions based on the equipment for assistance.

(ii) IF OPERATING THE FAILING EQUIPMENT:

1. Remain calm.
2. Do not remove your seatbelt.
3. Maintain two-way communication with supervisor.
4. Follow supervisor's instructions.
5. Address the failure.

(f) Powerline Contact

1. Attempt to break contact if safe to do so.
2. Stay in the cab of the equipment and do not touch any controls or exposed metal of the equipment.
3. Alert your supervisor of contact while inside cab. The supervisor must alert the local utility company immediately to de-energize the power line.
4. If safe to do so, exit the equipment. Ensure that you are not in contact with the ground and equipment at the same time as this may cause uncontrolled energy to arc to ground.
5. Report the contact. If the powerline is rated at 750 volts or more:
  - a. Report the contact to the inspection department of the Electrical Safety Authority within 48 hours.
  - b. Provide notice in writing to the MLITSD and to the Joint Health and Safety Committee, health and safety representative, and trade union.
6. Since you cannot smell, see, or hear an electric current there is no way for you to determine if fallen power lines are live. Never assume a

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downed line is safe to touch or to approach. Stay away from them. Tell others to stay away as well. Call 911 to alert emergency crews of the situation.

(g) Chemical Spill or Release

1. Assess the scene.
2. Isolate the surroundings to prevent anyone from entering the area and remove anyone who may be in the vicinity. Contain the spill using a spill kit.
3. Notify supervisor.
4. If toxic fumes are present, the supervisor will evacuate the building or area immediately.
5. Await further instructions.
6. Refer to Spill Response Safe Job Procedure for more details.

(h) Fire and Explosion

(i) IF YOU DETECT A FIRE:


1. Back away - assess the danger.
2. Use a fire extinguisher only if safe to do so.
3. Alert co-workers to evacuate the area - remain calm.
4. Sound an alarm - use pull station, shouts, etc.
5. Evacuate building by nearest, safe exit close doors as you leave.
6. Proceed to designated staging area for, "head count."
7. Advise supervisor/foreman of observations, location of fire, etc.
8. Remain at designated, "staging area" until further advised.

(ii) WHEN THE FIRE ALARM SOUNDS:

1. Assess the hazards.
2. Shut down equipment - if safe to do so.
3. Evacuate the building by nearest, safe exit, close doors behind you.
4. Proceed to designated staging area for muster, head count, assembly area.
5. Visitors, contractors, etc., are to stay with their host.
6. Advise supervisor/foreman of observations, location of fire, etc.
7. Remain at designated, "staging area" until further advised.

(i) Vehicle Incident



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(i) DURING A COLLISION RESULTING IN INJURY:

1. Stay at the scene.
2. Call for help or have someone else call 911.
3. Turn off engine and turn on flashers.
4. If trained in first aid, treat injuries.
5. Calmly wait for assistance.

(ii) DURING VEHICLE TROUBLE:

1. At the first sign of trouble, begin to pull over.
2. Check your mirrors, put on your hazard lights.
3. Never stop in the driving lanes.
4. Exit vehicle through the door away from traffic.
5. Call for help. While you wait for help, stay in your vehicle with the doors locked.

(j) Tornado

(i) IF INDOORS:

1. Seek shelter underground, such as a basement or a safe room.
2. If there is no basement, go to the centre of an interior room on the lowest level away from corners, windows, doors, and outside walls.
3. Get under a sturdy piece of furniture and use your arms to protect your head and neck.
4. Do not open windows.


(ii) IF OUTDOORS:

1. Do not wait until the tornado is visible to get inside.
2. If you cannot seek shelter, lie flat in a ditch or depression, and cover your head with your hands.
3. Do not go under an overpass or bridge if nearby, you are safer in a low, flat area.

(k) Earthquake

(i) IF INDOORS:

1. Drop, cover and hold; go under a sturdy piece of furniture, cover your head, and hold on.

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2. If there is nothing to duck under, crouch in the corner of the room.
3. Stay away from windows to avoid contact with shattered glass.
4. Remain inside until the shaking stops.
5. Use stairs instead of elevators when leaving the premises.

(ii) IF OUTDOORS:

1. Drop to the ground in a clear spot away from buildings, powerlines, trees, and streetlights.
2. Stay away from objects that could fall and injure you, remain still until the shaking stops.
3. Look around for falling tools, equipment, or material.

(iii) IF YOU ARE IN A VEHICLE:

1. Pull over to a safe place and stay inside.
2. Listen to your radio for instructions from emergency officials.
3. Do not leave your vehicle if downed power lines are across it, wait for help.
4. Stay away from anything that could collapse (i.e., buildings, structures, overpasses, underpasses, etc.)
5. Do not move your vehicle until the shaking stops.

(l) Flood

(i) IF INDOORS:

1. Unplug electrical equipment if safe to do so.
2. Be ready to evacuate as directed.
3. Follow the evacuation routes.


(ii) IF OUTDOORS:

1. Climb to high ground and stay there.
2. Avoid walking or driving through flood water.
3. If car stalls, abandon it immediately and climb to higher ground.

(m) Blizzard

(i) IF INDOORS:

1. Await instruction from Site Supervisor.
2. Stay indoors!

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3. Eat and drink. Food provides the body with energy and heat.  
Fluids prevent dehydration.

(ii) IF THERE IS NO HEAT:

1. Close off unneeded rooms or areas.
2. Stuff towels or rags under cracks in doors.
3. Wear layers of loose fitting, light weight clothing, if available.
4. Cover windows at night.

(n) IF STRANDED IN VEHICLE:

1. Stay in your vehicle.
2. Run the motor about ten minutes each hour. Open the windows a little for fresh air to avoid carbon monoxide poisoning. Make sure the exhaust pipe is not blocked.
3. Exercise to keep blood circulating and to keep warm.
4. Make yourself visible to rescuers.
5. Turn on the dome light at night when running the engine.
6. Tie a coloured cloth to your antenna or door.
7. Raise the hood after the snow stops falling.


(o) Other Inclement Weather Conditions

(i) IF INDOORS:

1. Notify the supervisor at once and await instructions.
2. Following the direction of the supervisor, you and all personnel are to assemble in a designated head count area.
3. Supervisor may determine whether it is necessary to move to a safe area, return to town or wait out the storm.
4. In buildings that offer little protection against severe weather, personnel are to evacuate the building immediately on the instruction of the supervisor. If severe weather is in progress refer to Tornado guidelines.

(ii) IF OUTDOORS:

1. Notify the supervisor at once and await instructions.
2. Following the direction of the supervisor, you and all personnel are to assemble in a designated head count area.

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3. Supervisor may determine whether it is necessary to move to a safe area, return to town or wait out the storm.

(iii) IF YOU'RE IN A VEHICLE:

1. Pull over to a safe place and stay inside.
2. Listen to your radio for instructions from emergency officials.
3. Do not leave your vehicle if downed power lines are across it, wait for help.
4. Stay away from anything that could collapse (i.e., buildings, structures, overpasses, underpasses, etc.)
5. Do not move your vehicle until the shaking stops.

(p) Exposure to Biological agents

1. Remain calm and assess the area of biological hazard exposure.
2. Notify the site supervisor immediately.
3. Follow the Biological Agents Safe Job Procedure based on the type of exposure.


(q) Exposure to Contaminated Water

1. Ensure all water safe for human use and consumption is stored separately from contaminated water and labelled as potable.
2. Maintain a clean set of clothes in a dry, secure area.
3. Always wash your hands with clean water, soap, and paper towels, prior to changing clothes, eating, drinking, or smoking.
4. Where contamination is heavy, you must always:
  - a. Shower and change out of work clothes before leaving the job.
  - b. Never take contaminated clothing home for washing.

(r) Exposure to Potential case or Suspected exposure to COVID-19

1. Notify your supervisor if you develop symptoms and stay at home or go home.
2. Take the COVID-19 self-assessment and follow the Public Health Agency of Canada's most recent guidance to ensure you get properly tested.
3. Review your organization's COVID-19 Procedure for more information on the appropriate controls and actions for the workplace/situation.

(s) Fall Rescue

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1. Remain calm. Notify the supervisor immediately.
2. Sound the emergency alarm to direct employees to stop working.
3. Maintain two-way communication with the employee if possible.
4. Isolate the area to limit exposure and move other employees to a safe zone.
5. Maintain a clear pathway for trained rescue personnel to prepare for rescue.
6. Follow the Fall Rescue Plan based on the site specifications.


(t) Trench Collapse

(i) PARTIAL COLLAPSE:

1. Remain calm and assess the situation. Notify the supervisor immediately.
2. Sound the emergency alarm to direct employees to stop working.
3. Maintain two-way communication with the employee if possible.
4. Rescue team to approach the trench from the end and establish safe ingress and egress ladders (2 ladders in the trench maximum 50 feet apart).
5. Rescue team to create a safe zone in the non-collapsed area of trench from both ends if possible.
6. Remove objects trapping victim. All work is to be stopped within the vicinity and area is to be isolated to limit exposure.
7. Maintain a clear pathway for trained rescue personnel to prepare for rescue.
8. Follow the Trench Collapse Plan where applicable based on the site specifications.

(ii) INCIDENTS WITH COLLAPSE:

1. Remain calm and assess the situation. Notify the supervisor immediately.
2. Sound the emergency alarm to direct employees to stop working.
3. Maintain two-way communication with the employee if possible.
4. Rescue team to approach the trench from the end and establish safe ingress and egress ladders (2 ladders in the trench maximum 50 feet apart).
5. Initiate the removal of dirt while operating in a safe zone to extend the safe zone into the collapsed zone.

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6. Create a safe zone around the victim. Victim is to be exposed from dirt using small shovels, hands, and buckets. Assess victim during the unearthing process.
7. Maintain a clear pathway for trained rescue personnel to prepare for rescue.
8. Follow the Trench Collapse Plan where applicable based on the site specifications.

(u) Caught in or crushed by Mobile Equipment

1. Remain calm. Notify the supervisor immediately.
2. Sound the emergency alarm to direct employees to stop working. Contact emergency personnel if necessary.
3. Maintain two-way communication with the employee if possible.
4. All work is to be stopped within the vicinity and area is to be isolated to limit exposure. Equipment is to be shut down and tagged out if safe.
5. Maintain a clear pathway for trained rescue personnel to prepare for rescue.
6. Assess victim and do not attempt rescue or move victim unless you can guarantee your safety and leaving them will cause further injury or endanger their life.
7. Secure incident site to prevent further injury and turn over control to emergency personnel once they have arrived.

(v) Electrical Shock and Explosion

1. Remain calm. Notify the supervisor immediately.
2. Sound the emergency alarm to direct employees to stop working.
3. Assess situation from a distance and evacuate area immediately.
4. Determine which objects are contacting the electrical output and determine safe zone and secure the area.
5. Do not touch the victim who has been contacted by electricity.
6. Only if assessed safe to do so, turn off the power at the main switchboard or at the source of the current.
7. Only if assessed safe to do so, use an insulated object to push the victim clear of the electrical source.
8. Only if assessed safe to do so and appropriate, use the CO<sub>2</sub> fire extinguisher designed to extinguish flames at the electrical source. Do not use an extinguisher which contains a conducting agent.
9. If not safe to turn off, wait for local electrical utility personnel to isolate and de-energize source.

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(w) Workplace Violence

1. Call the police, fire department or paramedics, summon medical attention, secure the location, or evacuate the premises.
2. There may be little sense in asking the perpetrator to stop, since doing so might just provoke that person even further.
3. Follow the general evacuation procedure found in this document.

(x) Acts of Terrorism

1. If gunfire is suspected, immediately hide and be silent. Do not confront them!
2. If the primary route of evacuation is not safe, find an alternate route.
3. Seek refuge in a room, close and lock the door, and barricade the door if it can be done quickly.
4. Switch your phone to silent and text someone to contact 911.
5. If gunfire is suspected outdoors, stay as close to the windows as possible.
6. If gunfire is suspected indoors, stay as close to the door as possible.
7. Once danger has been cleared, seek medical attention, if required.

## 5 Roles and Responsibilities


Responsibilities and accountabilities of workplace parties ensures a commitment by workplace parties ensuring a safe and healthy work environment. The responsibilities of workplace parties are outlined as per the Organization Chart and listed below with the specific roles within the organization.

### 5.1. Senior Management

- Allocate the time, budget, and resources for ensuring prompt and effective implementation of the Emergency Preparedness procedure.
- Review the process and effectiveness of emergency response drills annually.
- Provide emergency equipment as required.
- Provide adequate resources for staff to be trained in First Aid and the use of fire extinguishers as required by the Standard.
- Review and approve Emergency Response Plans.

### 5.2. Constructor



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- Establish written procedures to be followed in the event of an emergency for projects.
- Ensure that the procedures are followed at the project.
- Review the emergency procedures with the joint health and safety committee or the health and safety representative for the project,
- Ensure that the emergency procedures are posted in a conspicuous place at the project.
- Ensure that every worker at the project has ready access to a telephone, two-way radio, or other system of two-way communication in the event of an emergency.
- Provide means of egress from a work area to permit the evacuation of workers during an emergency.
- Ensure rescue plans on critical tasks are developed, implemented, and communicated.


### 5.3. Supervisors

- Ensure Emergency Response Plan is available at each workplace.
- Review emergency response plans and emergency procedure at a minimum annually and revise as appropriate
- Identify resources needed to implement the emergency response plans
- Orient all new personnel on job site to the plan.
- Post Emergency Response Plan on the health and safety board.
- Ensure emergency equipment is in place, well-marked and regularly inspected and maintained.
- Implement Emergency Response Plan as a member of site management, in the event of an emergency.
- Ensure all staff are trained & orientated about the First Aid Policy & procedures and the use of fire extinguishers.
- Ensure that all first aid equipment is maintained per applicable regulations.
- Maintain contact with injured workers after they have sought medical.
- Identify First Aid training requirements.
- Provide periodic training for workers on the first aid injury reporting requirements.
- Ensure that sufficient staff is trained and holds a valid First Aid certificate.
- Provide immediate transportation to a medical facility or the worker's home

### 5.4. Workers

- Report all emergencies to a supervisor.



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- Inform the employer of any hazards or circumstances which may lead to an emergency.
- Cooperate with site management in the implementation of the Emergency Response Plan.
- Receive training in the First Aid Program and Procedure.
- Report any first aid content taken from the first aid station to supervisor or first aider.
- Comply with safe return to work.

#### **5.5. Qualified First Aider**


- Administer First Aid as required.
- Ensuring that adequate first aid equipment is available, properly stocked and meets all WSIB requirements.
- Reporting first aid related hazards to the site supervisor.
- Ensure the First Aid Injury Logbook is completed accurately and kept confidential.
- Coordinate the transportation of injured workers to a physician's office or hospital with assistance from site supervisor.
- Ensure first aid certificate is current and posted each on site.
- Ensure monthly inspection of the first aid kit on site.

#### **5.6. Joint Health and Safety Committee (If applicable) /Health and Safety Representative**

- Participate in the preparation of the Emergency Response Plan.
- Ensure monthly inspection of emergency response equipment conducted by worker representative, as applicable.

#### **5.7. ERP Coordinator**

- Participate in the preparation of the Emergency Response Plan.
- Co-ordinate all activity and take all necessary actions to deal with a hazardous incident.
- Collate input to the response plan from relevant interested parties.
- Test the emergency response plans periodically (e.g., drills).
- Maintain records of testing and corrective actions.
- Communicate relevant information to all involved including workers, visitors, contractors, emergency response services, government authorities and the community regarding emergency response.

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## 6 Related Documents/Forms

- BESTCO-PRO-01.2-Document and Record Control Procedure
- BESTCO-PRO-10.0-Investigations and Reporting Procedure
- Emergency Response Plan
- Emergency Evacuation Drill Form
- First Aid Kit Inspection Form
- Fire Extinguisher Inspection Form
- Preventative Maintenance Schedule
- Emergency Response Equipment Maintenance Records
- Monthly Inspection Form
- Opioid Risk Assessment Form

## 7 Document and Record Maintenance


Documents and Records are maintained as per **BESTCO-PRO-01.2-Document and Record Control Procedure**.

## 8 Record Retention

Records are to be retained for a minimum of 3 years. Records will remain legible and readily identifiable.

## 9 Legislated/Other References

- Ontario Occupational Health and Safety Act (sections 32, 51-53, as also 8-9, 23-28)
- First Aid Requirements Regulation (O. Reg. 1101) under the Workplace Safety and Insurance Act, 1997
- Regulation 420/21 - Notices and Reports Under Sections 51 to 53.1 of the Act – Fatalities, Critical Injuries, Occupational Illnesses and Other Incidents – Ontario Occupational Health and Safety Act
- Construction Projects Regulation 213/91, Part 1 - General Requirement - s. 17, 18
- Construction Projects Regulation 213/91, Part 1 – Fire Safety - s. 52-58
- Workplace Safety and Insurance Act (WSIA), Part IV – Healthcare – s.38 – Transportation to hospital
- O. Reg. 213/07: Fire Code under Fire Protection and Prevention Act

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## Statistics and Records Policy

Bestco Construction Ltd.'s Statistics and Records program is designed to provide guidelines to maintain a process for collecting and reviewing health and safety statistics and records of the organization. It is aimed at documenting a procedure which will ensure that the statistics are collected, reviewed frequently and the gaps and trends are identified.

This policy applies to all workplace parties who are involved in the process of statistics and record collection and review.

Statistics inclusive of qualitative and quantitative measurements are collected at specified frequencies by Bestco Construction Ltd. Bestco Construction Ltd. will review statistical summaries, which include a combination of leading and lagging indicators to recognize trends and monitor the success of the Occupational Health and Safety Management System (OHSMS).

Senior Management is committed to ensuring the implementation of the Statistics and Records program by allocating the time, budget, and resources, as required.

The program and its performance shall be reviewed annually for sustainability, adequacy, and effectiveness.




Name: Michael Zaborsky

Title: President

Company: Bestco Construction (2005) Ltd.


Sept. 2, 2025

Date: 02 September, 2025

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# Statistics and Records Procedure

<b>Version No.</b>	<b>Reason for Revision:</b>	<b>Developed By and Date:</b>	<b>Reviewed By and Date:</b>	<b>Approved By and Date:</b>
1	To meet COR 2020 Standards, company's health and safety processes and Ontario's Health and Safety Legislative Requirements.	Emma Lisson, Health and Safety Coordinator 11 July, 2025	Michael Zaborsky and Ovidiu Cotiga, Senior Management 18 August, 2025	Michael Zaborsky, President 02 September, 2025

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## 1 Purpose

Bestco Construction Ltd. will collect and review statistical summaries inclusive of qualitative measurements, quantitative measurements, leading indicators and lagging indicators. This will assist to recognize the trends and monitor the success of the Occupational Health and Safety Management System (OHSMS). Analysis of health and safety summary reports will provide information regarding which component of the entire health and safety program needs attention and improvement to assist in the prevention of accidents and injuries. To review the data from these sources, it is necessary to establish a system to document, maintain records from all Bestco Construction Ltd. controlled sites (offices, projects, operations), employees and contractors.

## 2 Scope

The Statistics and Records policy and procedure applies to all work or work-related activities performed under the control of the organization by workplace parties.

## 3 Definitions


**Action Plan:** A plan that identifies the tasks to be accomplished, assigns responsibilities for completing each task, identifies the timeline in which it is to be completed, and records the actual action taken and completion dates. [Ref. COR 2020 Audit Handbook].

**Audit:** Systematic, independent, and documented process for obtaining evidence and evaluating it objectively to determine the extent to which pre-determined criteria are fulfilled. [Ref. COR 2020 Audit Handbook].

**Competency:** A person performing a task for, or on behalf of, the organization is competent to do so by means of appropriate:

- a) Knowledge of the hazards and risks associated with the tasks for the operations and activities.
- b) Demonstrated understanding and working knowledge of the control measures associated with the hazards and risks.
- c) Training regarding the hazards, risks, and associated control measures d) Aptitudes, such as skillset, ability, and willingness to deal with the hazards, risks, and control measure.

[Ref. COR 2020 Audit Handbook].

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**Competent Person:** A person who,

- a) is qualified because of knowledge, training, and experience to organize the work and its performance,
- b) is familiar with this Act and the regulations that apply to the work, and
- c) has knowledge of any potential or actual danger to health or safety in the workplace.

[Ref. OHSA].

**Competent Worker:** In relation to specific work, means a worker who,

- a) is qualified because of knowledge, training, and experience to perform the work,
- b) is familiar with the Occupational Health and Safety Act and with the provisions of the regulations that apply to the work, and
- c) has knowledge of all potential or actual danger to health or safety in the work.

[Ref. O. Reg. 213/91: Construction Projects under OHSA].

**Compliance:** Meeting all requirements outlined within applicable legislation and regulations. [Ref. COR 2020 Audit Handbook].

**Conformity:** Fulfillment of a requirement. [Ref. COR 2020 Audit Handbook].

**Continual Improvement:** Recurring activity to enhance performance and achieve a measurable result. [Ref. COR 2020 Audit Handbook].


**Corrective Action:** Action to eliminate the cause of a non-conformity and to prevent recurrence. There can be more than one cause for a non-conformity. [Ref. COR 2020 Audit Handbook].

**Document:** Medium containing information related to the OHSMS.

**Employer:** A person who employs one or more workers or contracts for the services of one or more workers and includes a contractor or subcontractor who performs work or supplies services and a contractor or subcontractor who undertakes with an owner, constructor, contractor, or subcontractor to perform work or supply services [Ref. OHSA].

**Hazard:** Source, situation, or act with a potential for harm in terms of human injury. [Ref. COR 2020 Audit Handbook].

**Incident:** Work related event(s) in which an injury, fatality or occupational illness occurred; and includes event(s) where no injury or illness occurred, such as a near hit or property damage. [Ref. COR 2020 Audit Handbook].

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**Interested Parties:** Persons or groups, inside or outside the workplace, concerned with or affected by OHS performance of an organization. [Ref. COR 2020 Audit Handbook].

**Legal Requirements:** All applicable legislation, including but not limited to the Occupational Health and Safety Act and its regulations.

**Management:** People who have care and control over people and/or processes [Ref. COR 2020 Audit Handbook].

- **Middle Management (Project Manager, Office Manager, etc.):** A group of managers who administers and/or supervises the affairs of a department or division at the level below senior management of the company or organization.

**Non-conformity:** Non-fulfillment of a requirement [Ref. COR 2020 Audit Handbook].

**Objective:** Result to be achieved. An objective can be expressed in many ways, e.g., as an intended outcome, a purpose, an operational criterion, as an OHS objective or by the use of other words with similar meaning (e.g. aim, goal, or target) [Ref. COR 2020 Audit Handbook].

**Occupational Health and Safety (OHS):** Conditions and factors that affect or could affect the health and safety of employees or other workers, inclusive of temporary workers and contractor personnel, visitors, suppliers, vendors, or any other person in the workplace. [Ref. COR 2020 Audit Handbook].


**Occupational Health and Safety Management System (OHSMS):** As defined in the OHSa “means a coordinated system of procedures, processes and other measures that is designed to be implemented by employers to promote continuous improvement in occupational health and safety. [Ref. COR 2020 Audit Handbook].

**OHS Objective:** OHS goal, in terms of OHS performance, that an organization sets itself to achieve. [Ref. COR 2020 Audit Handbook].

**OHS Performance:** Measurable results of an organization’s management of its OHS risks. [Ref. COR 2020 Audit Handbook].

**OHS Policy:** Overall intentions and direction of an organization related to its OHS performance as formally expressed by senior management in relation to the implementation of the OHSMS. [Ref. COR 2020 Audit Handbook].



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**Organization:** Company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public, or private, that has its own functions, management, and administration. [Ref. COR 2020 Audit Handbook].

**Other Requirements:** Requirements or provisions the organization subscribes, however are not legally binding, such as industry standards. [Ref. COR 2020 Audit Handbook].

**Participation:** Involvement of workers, or worker representatives, in decision-making process(es) regarding the OHSMS. [Ref. COR 2020 Audit Handbook].

**Plan:** Detailed method for doing or achieving something. [Ref. COR 2020 Audit Handbook].

**Policy:** A policy is a general commitment, direction or intention and is formally stated by top management. A quality policy statement should express top management's commitment to the implementation and improvement of its management system. [Ref. COR 2020 Audit Handbook].

**Preventative Action:** Action to eliminate the cause of potential non-conformity or another potential undesirable potential situation. There can be more than one cause for a potential nonconformity. (For the purposes of this Standard, this refers to any action taken to fix a potential OHS problem.) [Ref. COR 2020 Audit Handbook].


**Procedure:** A documented, specified method to carry out an activity. **Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].

**Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].

**Project:** a construction project, whether public or private, including,

- the construction of a building, bridge, structure, industrial establishment, mining plant, shaft, tunnel, caisson, trench, excavation, highway, railway, street, runway, parking lot, cofferdam, conduit, sewer, watermain, service connection, telegraph, telephone or electrical cable, pipe line, duct or well, or any combination thereof,
- the moving of a building or structure, and
- any work or undertaking, or any lands or appurtenances used in connection with construction.

[Ref. OHSAA].

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**Qualitative:** Relating to the nature or description of something, rather than to its quantity [Ref. COR 2020 Audit Handbook].

**Quantitative:** The measurement or number of something rather than its quality [Ref. COR 2020 Audit Handbook].

**Record:** Document stating results achieved or providing evidence of activities performed. [Ref. COR 2020 Audit Handbook].

**Residual Risk:** Combination of the likelihood of the occurrence after the hierarchy of controls has been implemented for an identified hazard [Ref. COR 2020 Audit Handbook].

**Risk:** Combination of the likelihood of an occurrence of a hazardous event or exposure(s) and the severity of injury or occupation illness that can be caused by the event or exposure(s) [Ref. COR 2020 Audit Handbook].

**Risk Assessment:** Process of evaluating the risk(s) arising from a hazard(s), taking into account the adequacy of any existing controls, and deciding whether or not the risk(s) is acceptable [Ref. COR 2020 Audit Handbook].


**Senior Management (Company President, Vice President of Operations):** Person(s) at the highest level of an organization's structure responsible for leading, managing and /or directing an organization's day-to-day activities and/or operations [Ref. COR 2020 Audit Handbook].

**Supervisor:** A person who has charge of a workplace or authority over a worker. [Ref. COR 2020 Audit Handbook].

**Supplier:** A person who supplies any machine, device, tool, or equipment under any rental, leasing, or similar arrangement for use in or about a workplace. [Ref. OHSAA].

**Worker:** Any of the following, but does not include an inmate of a correctional institution or like institution or facility who participates inside the institution or facility in a work project or rehabilitation program:

- a) A person who performs work or supplies services for monetary compensation.
- b) A secondary school student who performs work or supplies services for no monetary compensation under a work experience program authorized by the school board that operates the school in which the student is enrolled.

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- c) A person who performs work or supplies services for no monetary compensation under a program approved by a college of applied arts and technology, university, private career college or other post-secondary institution.
- e) Such other persons as may be prescribed who perform work or supply services to an employer for no monetary compensation.

[Ref. OHSA].

**Workplace:** any land, premises, location, or thing at, upon, in or near which a worker works. [Ref. OHSA].

**Workplace Parties:** Includes, but is not limited to, the employer, supervisor(s), workers, constructor, visitors, and owner. [Ref. COR 2020 Audit Handbook].

## 4 Procedure


Bestco Construction Ltd. will maintain a process for collecting and reviewing health and safety statistics and records. Bestco Construction Ltd. uses the **4SafeCom™** management system to maintain statistical data and records. All Bestco Construction Ltd. records shall be entered and stored on a daily, weekly, monthly, and quarterly basis into the **4SafeCom™**, as per the defined frequencies. Designated personnel will be required to complete the forms within the **4SafeCom™** system. The weekly, monthly, and quarterly health and safety summaries are rolled into the Annual Health and Safety Corporate Summary. Corporate and project health and safety summaries are maintained and can be extracted at any time and/or at any required frequency.

Inputs on statistical reports will be collected from different teams on a scheduled basis. The health and safety summary along with the input from different teams will be analyzed and assessed as part of the Management review.


### 4.1. Corporate and/or Project Health and Safety Summaries

Bestco Construction Ltd. has established a list of leading and lagging performance indicators (listed in the chart below) and initiated **4SafeCom™ forms** to track the performance. The appointed workplace parties shall complete the required forms and the records shall be entered into **4SafeCom™**. Records are collected based on the following frequencies by the responsible workplace parties:

Key Performance Indicators (KPIs)	Leading (LD)/ Lagging (LG)	Location	Frequency	Responsibility


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Pre-job Safety Assessment (PSA)	LD	Project site	Daily	Site Supervisor with worker involvement
Supervisor Inspection	LD	Project site	Weekly	Site Supervisor
Toolbox talk	LD	Project site	Weekly	Site Supervisor with worker involvement
Safety Summary	LD	Project site	Weekly	Supervisor (To monitor active project days, man hours, subcontractor activities, etc.)
H&S Rep Inspection	LD	Office/Shop/ Project Site	Monthly	H&S Rep
Middle Management Inspection	LD	Office/Shop/ Project Site	Quarter-Yearly (one workplace)	Project Managers
Senior Management Inspection	LD	Office/Shop/ Project Site	Annually (one workplace)	Senior Management
JHSC Meeting Minutes (if applicable)	LD	Corporate Level/Project site, if applicable	Minimum every 3 month	JHSC Members
Fire Extinguisher Inspection	LD	Office/Shop/ Project Site	Monthly	Competent Person
Pre-use Inspections of vehicle/tool/machinery/equipment	LD	Office/Shop/ Project Site	Pre-use	Equipment Operator
Emergency Response Plan	LD	Office/Shop/ Project Site	Pre-start	Supervisor
Project Pre-Start Form	LD	Project site	Pre-start	Supervisor
Incident Reports (inclusive of near misses)	LG	Office/Shop/ Project Site	On Occurrence	Site Supervisor with JHSC/Worker Rep (When applicable)

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Incident Investigations	LG	Office/Shop/ Project Site	On Occurrence	Site Supervisor with JHSC/Worker Rep (When applicable)
New Hire Orientation	LD	Shop	On Occurrence	Facilitator
Site Orientation	LD	Shop/ Project Site	On Occurrence	Site Supervisor with new worker on-board
Hazard Reporting	LD	Office/Shop/ Project Site	On Occurrence	Reporting personnel and Supervisor Follow Up
Disciplinary Actions	LG	Office/Shop/ Project Site	On Occurrence	Supervisor with worker involvement
First Aid Log	LG	Office/Shop/ Project Site	On Occurrence	First aid Treatment Personnel with the witness
First Aid Kit Inspection	LD	Office/Shop/ Project Site	Minimum Quarterly	Competent Person
Contractor Management forms	LD	Corporate Level	Ongoing	Project Manager/Senior Management Rep
Training Records	LD	Corporate Level	On Occurrence	Facilitator
Preventative Maintenance Records	LD	Office/Shop/ Project Site	Based on Manufactur er's guidelines	Maintenance personnel
MLITSD Orders	LG	Corporate Level	On Occurrence	Health and safety coordinator
WSIB Claims	LG	Corporate Level	On Occurrence	Health and safety coordinator

The above quantitative measurements of the statistics and records can be derived from **4SafeCom™**.

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Bestco Construction Ltd. will also ensure the following qualitative information is collected and assessed to measure the quality of the OHS performance:

Key Performance Indicators (KPIs)	LDs/ LGs	Location	Frequency	Responsibility
Inspections/Audits by third parties	LD	Office/Shop/ Project Site	Minimum 3 per year	Health and safety coordinator
Feedback/Recommendations	LD	Office/Shop/ Project Site	On Occurrence	Reporting personnel
Health and Safety Surveys	LD	Office/Shop/ Project Site	On Occurrence	All employees


All the above information will be recorded in retained in **4SafeCom™** system. The following dashboard will be produced in **4SafeCom™** to identify the gaps and trends in the OHSMS.

- Non-conformity tracker
- Orientation reports
- Training matrix
- Incident Tracker
- Preventative Maintenance tracker
- Hazard Report Summary
- Action item summary
- First aid treatment summary
- Health and Safety summaries (Weekly, Monthly, Quarterly, Annual)

#### 4.2. Preparation of Health and Safety Summaries

As part of the initiative, Senior Management of Bestco Construction Ltd. will designate a team to prepare quarterly summaries which is required for Management review. The designated team will meet quarterly to prepare the OHS summary as per the frequency below:

Action	Responsible Party	Timeline
Preparation of	Health and Safety Coordinator	After completion of the quarterly term (Beginning of next quarter)

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Quarterly Summary		
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#### 4.3. Analyzing Health and Safety Summaries

Senior Management will designate a collective team inclusive of Health and Safety Coordinator, Project Manager Representatives, JHSC and Senior Management Representatives (if applicable) to meet semi-annually to review the quarterly inputs.

Action	Responsible Party	Timeline
Analyzing Quarterly Summaries	Health and Safety Coordinator, Project Manager Representatives, , Senior Management Representatives	After completion of two quarterly terms (Beginning of next quarter)
Presenting findings to Senior Management	Health and Safety Coordinator/ Senior Management Representative	After completion of two quarterly term (Beginning of next quarter)

Statistics are analyzed and needs, or trends are identified by the designated team during the review. **4SafeCom™** dashboard reports will be utilized to conduct the analysis. A root cause analysis will be conducted as part of the review and the following outputs will be determined:


- areas where training is needed.
- where equipment should be repaired or replaced
- where a safe work practice and/or safe job procedures should be developed
- where a specific job task analysis should be undertaken
- where new forms needed to get additional statistical information
- new dashboards requirement to monitor statistics.
- orientation process improvement
- requirement of safety meetings to share information.
- Effectiveness of current KPIs and new KPIs

The team will prepare recommended corrective actions and present it to Senior Management as part of the preparations for the Management meeting.

#### 4.4. Analysis of Statistics

Senior Management will conduct a meeting to review the input collected from designated team prior to the Annual Management review. Based on submitted input,



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year-to-year, quarter-to-quarter, month-to-month comparison will be made, and the trends are identified. The performance will be evaluated for effectiveness and opportunities for improvement will be identified. This will be conducted as part of the Management Review meeting.

#### 4.5. First Aid Treatment Record Analysis

First aid treatments are analyzed to ensure that trends are identified and opportunities for improvements are made to avoid any future incidents and/or injuries. A corrective action plan will be developed as part of the Management review.

Target date for every activity will be scheduled at the beginning of the year and communicated to all relevant parties by Health and Safety Coordinator. Health and Safety Coordinator will coordinate these meetings.

#### 4.6. Statistics and Records Follow ups

Any critical item at any stage will be addressed immediately with Senior Management.

Senior Management will incorporate the OHS performance as part of the Management review annually. Any corrective actions related to the findings will be included as part of the Management Review Action Plan. Senior Management will assign responsible personnel/team to address the corrective actions. Results of the statistics and records review along with the Action Plan will be communicated to relevant workplace parties through meetings, emails, etc.


## 5 Roles and Responsibilities

Responsibilities and accountabilities of workplace parties ensures a commitment by workplace parties ensuring a safe and healthy work environment. The responsibilities of workplace parties are outlined as per the Organization Chart and listed below with the specific roles within the organization.

### 5.1. Senior Management

- Provide time, budget, and resources, as required.
- Designates teams to collect and review the health and safety performance.
- Participate in Statistical Review Meetings.
- Review the findings from statistical reports.



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- Communicate the results of the analysis of statistics and identified trends or needs to relevant workplace parties.
- Develop an action plan as part of the Management review.
- Appoint individuals to implement corrective actions.
- Communicate the corrective action plan to all workers.

## 5.2. Supervisors

- Assist in the data collection and analysis process as required.
- Carry out root cause analysis for established trends.
- Implement corrective action plans to address root cause analysis findings.
- Provide input to Senior Management for continuous improvement.

## 5.3. Workers


- Assist in the data collection and analysis process, as required.
- Participate in the root cause analysis, as required.
- Provide input to Senior Management for continuous improvement.

## 5.4. Joint Health & Safety Committee (JHSC) (if applicable)/ Designated Statistics Review Team

- Collate relevant data to develop health and safety summaries.
- Coordinate with Managers/Supervisors to collate relevant data to develop health and safety summaries.
- Analyse data to establish trends or needs.
- Coordinate with Managers and Supervisors to undertake root cause analysis based on established trends.
- Recommend corrective actions to JHSC/Senior Management based on the results of the root cause analysis.
- Communicate the results of the analysis of statistics and identified trends or needs to relevant workplace parties.

# 6 Related Documents/Forms

- BESTCO-PRO-01.2-Document and Record Control Procedure.
- Pre-job Safety Assessment (PSA)
- Supervisor Inspection
- Toolbox talk
- Safety Summary

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- JHSC Worker Rep/H&S Rep Inspection
- JHSC Meetings
- Fire Extinguisher Inspection
- Pre-use Inspections of vehicle/tool/machinery/equipment
- Emergency Response Plan
- Project Pre-Start Form
- Incident Reporting and Investigation
- New Hire Orientation
- Site Orientation
- Hazard Reporting
- Disciplinary Actions
- First Aid Log
- First Aid Kit Inspection
- Contractor Management forms
- Training Records
- Preventative Maintenance Records
- MLITSD Orders
- Inspections/Audits by third parties
- Feedback/Recommendations
- Health and Safety Surveys
- Non-conformity tracker
- Orientation reports
- Training matrix
- Incident Tracker
- Preventative Maintenance tracker
- Hazard Report Summary
- Action item summary
- First aid treatment summary
- Health and Safety summaries (Weekly, Monthly, Quarterly, Annual)

## 7 Document and Record Maintenance

Documents and Records are maintained as per **BESTCO-PRO-01.2-Document and Record Control Procedure**.


## 8 Record Retention

Records are to be retained for a minimum of 3 years. Records will remain legible and readily identifiable.

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## 9 Legislated/Other References

- All applicable legislations and standards
- COR™ 2020 Program Guideline

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# LEGISLATION AND OTHER REQUIREMENTS PROCEDURE

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1	To meet COR 2020 Standards, company's health and safety processes and Ontario's Health and Safety Legislative Requirements.	Emma Lisson, Health and Safety Coordinator 11 July, 2025	Michael Zaborsky and Ovidiu Cotiga, Senior Management 18 August, 2025	Michael Zaborsky, President 02 September, 2025

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## 1 Purpose

The purpose of the Legislation procedure is to provide guidelines to establish, implement, monitor, and maintain activities conducted under Bestco Construction Ltd. and ensure compliance with prevailing Legislation. The procedure provides guidance on how Bestco Construction Ltd. identifies and maintains Legislative compliance to new and existing Legislation.

## 2 Scope

This procedure applies to all activities and projects undertaken by all workplace parties under Bestco Construction Ltd. shall conform to Occupational Health and Safety Act and all applicable Legislation.

## 3 Definitions

**Certified Member:** A Joint Health and Safety Committee (JHSC) member who has fulfilled the Chief Prevention Officer's (CPO) requirements to become certified. This includes training and other requirements the CPO deems necessary [Ref. OHSA].

**Competency:** A person performing a task for, or on behalf of, the organization is competent to do so by means of appropriate:

- Knowledge of the hazards and risks associated with the tasks for the operations and activities.
- Demonstrated understanding and working knowledge of the control measures associated with the hazards and risks.
- Training regarding the hazards, risks, and associated control measures
- Aptitudes, such as skillset, ability, and willingness to deal with the hazards, risks, and control measure.


[Ref. COR 2020 Audit Handbook].

**Competent Person:** A person who,

- is qualified because of knowledge, training, and experience to organize the work and its performance,
- is familiar with this Act and the regulations that apply to the work, and
- has knowledge of any potential or actual danger to health or safety in the workplace.

[Ref. OHSA].

**Competent Worker:** In relation to specific work, means a worker who,

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- a) is qualified because of knowledge, training, and experience to perform the work,
  - b) is familiar with the Occupational Health and Safety Act and with the provisions of the regulations that apply to the work, and
  - c) has knowledge of all potential or actual danger to health or safety in the work.
- [Ref. O. Reg. 213/91: Construction Projects under OHSA].

**Compliance:** Meeting all requirements outlined within applicable legislation and regulations. [Ref. COR 2020 Audit Handbook].

**Conformity:** Fulfillment of a requirement. [Ref. COR 2020 Audit Handbook].

**Contractor:** A person or organization providing services to another organization in accordance with agreed upon specification, terms, and conditions.  
[Ref. COR 2020 Audit Handbook].

- **Subcontractor:** A person or organization that takes a portion of a contract from the principal contractor or another subcontractor

**Constructor:** A person who undertakes a project for an owner and includes an owner who undertakes all or part of a project by himself or by more than one employer [Ref. OHSA].

**Document:** Medium containing information related to the OHSMS. [Ref. COR 2020 Audit Handbook].


**Employer:** A person who employs one or more workers or contracts for the services of one or more workers and includes a contractor or subcontractor who performs work or supplies services and a contractor or subcontractor who undertakes with an owner, constructor, contractor, or subcontractor to perform work or supply services [Ref. OHSA].

**Health and Safety Management System:** A coordinated system of procedures, processes and other measures that is designed to be implemented by employers in order to promote continuous improvement in occupational health and safety [Ref. OHSA].

**Health and Safety Representative:** A worker that brings awareness to safety concerns and facilitates communication between the constructor, supervisor, and the workers regarding safety.

- At a project or other workplace where no committee is required and where the number of workers regularly exceeds five, the constructor or employer shall cause the workers to select at least one health and safety representative from among the workers at the workplace who do not exercise managerial functions.

[Ref. OHSA].

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**Incident:** Work related event(s) in which an injury, fatality or occupational illness occurred; and includes event(s) where no injury or illness occurred, such as a near hit or property damage. [Ref. COR 2020 Audit Handbook].

**Interested Parties:** Persons or groups, inside or outside the workplace, concerned with or affected by OHS performance of an organization. [Ref. COR 2020 Audit Handbook].

**Joint Health and Safety Committee (JHSC):** An advisory body composed of worker and management representatives that are committed to improving health and safety conditions in the workplace. A joint health and safety committee is required at workplace,

- at which twenty or more workers are regularly employed;
- with respect to which an order to an employer is in effect;
- other than a construction project where fewer than twenty workers are regularly employed, with respect to which a regulation concerning designated substances applies.

This requirement does not apply to a constructor at a project at which work is expected to last less than three months [Ref. OHSA].

**Legal Requirements:** All applicable legislation, including but not limited to the Occupational Health and Safety Act and its regulations [Ref. COR 2020 Audit Handbook].

**Management:** People who have care and control over people and/or processes [Ref. COR 2020 Audit Handbook].

- Middle Management (Project Manager, Office Manager, etc.):** A group of managers who administers and/or supervises the affairs of a department or division at the level below senior management of the company or organization.


**Non-conformity:** Non-fulfillment of a requirement [Ref. COR 2020 Audit Handbook].

**Occupational Health and Safety (OHS):** Conditions and factors that affect or could affect the health and safety of employees or other workers, inclusive of temporary workers and contractor personnel, visitors, suppliers, vendors, or any other person in the workplace. [Ref. COR 2020 Audit Handbook].

**Occupational Health and Safety Management System (OHSMS):** As defined in the OHSA “means a coordinated system of procedures, processes and other measures that is designed to be implemented by employers in order to promote continuous improvement in occupational health and safety.

[Ref. COR 2020 Audit Handbook]



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**Organization:** Company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public, or private, that has its own functions, management, and administration. [Ref. COR 2020 Audit Handbook].

**Other Requirements:** Requirements or provisions the organization subscribes, however are not legally binding, such as industry standards. [Ref. COR 2020 Audit Handbook].

**Owner:** Includes a trustee, receiver, mortgagee in possession, tenant, lessee, or occupier of any lands or premises used or to be used as a workplace, and a person who acts for or on behalf of an owner as an agent or delegate. [Ref. OHSA].

**Participation:** Involvement of workers, or worker representatives, in decision-making process(es) regarding the OHSMS. [Ref. COR 2020 Audit Handbook].

**Plan:** Detailed method for doing or achieving something. [Ref. COR 2020 Audit Handbook].

**Policy:** A policy is a general commitment, direction or intention and is formally stated by top management. A quality policy statement should express top management's commitment to the implementation and improvement of its management system. [Ref. COR 2020 Audit Handbook].


**Procedure:** A documented, specified method to carry out an activity. **Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].

**Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].

**Project:** a construction project, whether public or private, including,

- a) the construction of a building, bridge, structure, industrial establishment, mining plant, shaft, tunnel, caisson, trench, excavation, highway, railway, street, runway, parking lot, cofferdam, conduit, sewer, watermain, service connection, telegraph, telephone or electrical cable, pipe line, duct or well, or any combination thereof,
- b) the moving of a building or structure, and
- c) any work or undertaking, or any lands or appurtenances used in connection with construction.

[Ref. OHSA].

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**Record:** Document stating results achieved or providing evidence of activities performed. [Ref. COR 2020 Audit Handbook].

**Senior Management (Company President, Vice President of Operations) -**

**Employer's Representative:** Person(s) at the highest level of an organization's structure responsible for leading, managing and /or directing an organization's day-to-day activities and/or operations. [Ref. COR 2020 Audit Handbook].

**Supervisor:** A person who has charge of a workplace or authority over a worker [Ref. OHSA].

**Supplier:** A person who supplies any machine, device, tool, or equipment under any rental, leasing, or similar arrangement for use in or about a workplace. [Ref. OHSA].

**Trade Union:** means a trade union as defined in the Labour Relations Act, 1995 that has the status of exclusive bargaining agent under that Act in respect of any bargaining unit or units in a workplace and includes an organization representing workers or persons to whom this Act applies where such organization has exclusive bargaining rights under any other Act in respect of such workers or persons [Ref. OHSA].


**Worker:** Any of the following, but does not include an inmate of a correctional institution or like institution or facility who participates inside the institution or facility in a work project or rehabilitation program:

- A person who performs work or supplies services for monetary compensation.
- A secondary school student who performs work or supplies services for no monetary compensation under a work experience program authorized by the school board that operates the school in which the student is enrolled.
- A person who performs work or supplies services for no monetary compensation under a program approved by a college of applied arts and technology, university, private career college or other post-secondary institution.
- Such other persons as may be prescribed who perform work or supply services to an employer for no monetary compensation.

[Ref. OHSA].

**Workplace:** any land, premises, location, or thing at, upon, in or near which a worker works. [Ref. OHSA].

**Workplace Harassment:** means,

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- a) 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
  - b) workplace sexual harassment
- [Ref. OHSA].

**Workplace Parties:** Includes, but is not limited to, the employer, supervisor(s), workers, constructor, visitors, and owner. [Ref. COR 2020 Audit Handbook].

**Workplace Sexual Harassment:** means,

- a) 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, or
- b) 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

[Ref. OHSA].

**Workplace Violence:** means,

- 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 the worker,
- c) a statement or behaviour that it 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

[Ref. OHSA].


## 4 Procedure

### 4.1. Orientation

Legislation is introduced to all workers during their orientation. All orientation records will be retained and are available through 4SafeCom™. Orientation records will be signed and dated by employee and facilitator.

#### (a) New Employee Orientation

On the first day of employment, employees are required to complete The Company's Employee Health and Safety Orientation. New employees will be

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provided with a tour of the physical work environment and given the basic health and safety information. As part of the tour, supervisor and the new employee will review the **New Employee Orientation Checklist**.

The following is the information that should be covered in the employee orientation:

- Introduction to the company
- Introduction to Legislation and Other Requirements
- Facility Orientation
- Company Policies
- Hazard Recognition and Assessment
- Safe Work Practices and Safe Job Procedures
- Training
- Emergency Procedures


Orientation will be conducted with all personnel upon joining the company. Both the worker and the facilitator will sign the orientation checklist.

(b) **Site Orientation**

All new workers and supervisors will be given a tour of project site. Any worker coming to a project site for the first time is considered a “new worker” and requires a site orientation. The supervisor is responsible for providing this orientation before the worker is allowed to start work. This will be done using the **Site Orientation Form**. During the site orientation, the following legislative topics will be discussed to ensure workers understanding:

- Health and Safety Policy & Health and Safety Program
- Legislation and Other Requirements
- Site specific safety standards/applicable procedures
- Location of posted copies of Legislation
- Names of First Aid Attendants and location of First Aid Stations/Kits
- Site Health and Safety Representative, Joint Health and Safety Committee Worker Trades Committee, if any
- Emergency response plan and procedure
- Site Safety Data Sheets (SDSs)

## 4.2. Training

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Bestco Construction Ltd. ensures Legislation is included in all the training material provided to all employees. All workers have access and are trained in accordance with the following documentation.

- a) Health and Safety Manual:
- b) A copy of Bestco Construction Ltd.'s health and safety manual will be available to workers.
- c) Job Hazard Assessment:
  - All workplace parties must ensure they are properly trained and have reviewed the Job Hazard Assessment prior to executing work tasks. The hazard assessment contains a legislative section which supervisors and workers must review with before starting work.
  - The Job hazard assessment will be made available to all workplace parties.
  - Daily hazard assessments will be conducted and controlled according to applicable legislation.
- d) Safe Work Practices and Safe Job Procedures:
  - All workplace parties involved must review Bestco Construction Ltd. safety materials and ensure they have received all legislated training as specified in the safe work practices and safe job procedures.

#### 4.3. Site Set Up


Supervisor will verify the board has the following posted information for all workplace parties. The **Jobsite Document Checklist** will be used by the supervisor to ensure that all legislative requirements are made available.

## 5 Applicable Legislation, Regulations, Standards, and any Other Requirements


### 5.1. Health and Safety Postings

Refer to Chart below regarding legislative reference and frequency to postings required:

Posting Requirement		Frequency of Update
Reference #	Health and Safety Material	
OHSA s.25(2)(i)	The Occupational Health and Safety Act (aka the green book) (must be posted)	As changes occur


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Posting Requirement		Frequency of Update
Reference #	Health and Safety Material	
	Applicable Regulations (O.Reg.851: Industrial Establishments/O.Reg. 213/91: Construction Projects, etc.) (must be available)	As changes occur
OHSA s.25(2)(i)	“Health & safety at work: Prevention Starts Here” poster (both in English and the majority language of the workplace) (must be posted)	As changes occur
OHSA s.25(2)(i), s.25(3.1), Employment Standards Act (ESA) s.2	“Employment Standards in Ontario” poster (must be provided to employees who are covered by the ESA within 30 days of their date of hire)	As changes occur
OHSA s.25(2)(k)	Health and Safety Policy statement (must be posted)	Yearly
OHSA s.32.0.1 (2)	Workplace Violence and Harassment Policy statement (must be posted)	Yearly
O.Reg.1101 s.1(1)b(i)	“In case of injury poster (“1234”)” (Form 82) (must be posted)	As changes occur
O.Reg.1101 s.1(1)b(ii)	Valid first aid certificates of qualification of the trained workers on duty	As changes occur
O.Reg.1101 s.1(1)b(iii)	An inspection card with spaces for recording the date of the most recent inspection of the first aid box and the signature of the person making the inspection.	Minimum quarterly
OHSA s.9(32)	Names of JHSC members and work locations (must be posted), if applicable	As changes occur
	Name of the Health and Safety Representative (must be posted), if applicable	As changes occur
OHSA s.57(10)	Copy of Ministry of Labour, Immigration, Training and Skills Development (MLITSD) Inspector’s orders, inspection reports (must be posted – if any)	As changes occur and monthly

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Posting Requirement		Frequency of Update
Reference #	Health and Safety Material	
	Other Health and Safety Program policies (must be available)	Yearly
O.HSA s.38(1)(a)	Safety data sheets (SDSs) for hazardous products (available)	As changes occur
<b>Construction Projects</b>		
O.Reg.213/91 s.13(1) (2)	<p>A notice setting out:</p> <ul style="list-style-type: none"> <li>a) the constructor's name and if the constructor carries on business in a different name, the business name;</li> <li>b) the address and telephone number of the constructor's head office or principal place of business in Ontario; and</li> <li>c) the address and telephone number of the nearest office of the Ministry</li> </ul> <p>the name, trade and employer of the health and safety representative or of each of the committee members must be added to the notice within forty-eight hours after a health and safety representative or joint health and safety committee members are selected for a project.</p> <p>(Must be posted)</p>	
O.Reg.213/91 s.6(6)	MLITSD approved notification form for the project (must be posted)	As changes occur
O.Reg.213/91 s.5(2)(b)	MLITSD approved registration forms for all employers working at the project (must be available)	As changes occur
O.Reg.213/91 s.44	DANGER signs in hazardous areas (must be posted)	As changes occur
O.Reg.213/91 s.29(10)	Location of toilet facilities – noted on ERP (must be posted)	As changes occur
O.Reg.213/91 s.26.2(1.1) & (4)	Working at Heights training records (must be available)	As changes occur




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Posting Requirement		Frequency of Update
Reference #	Health and Safety Material	
<b>Section #</b>	<b>Emergency Planning</b>	
O.H.S.A s. 25.2 (1)	A naloxone kit must provide and maintain a naloxone kit if there is a risk of a worker having an opioid overdose at a workplace	As changes occur
	Emergency Response Plan (ERP) with responses to identified hazards, roles and responsibilities, Emergency Service Numbers, Location of nearest hospital, site layout with Emergency Response Equipment, etc.(must be posted)	As changes occur
O.Reg.213/91 s.17(3)	Emergency Response Procedures (must be posted)	Yearly
O.Reg.213/91 s.26.1(4)	Fall rescue procedures (must be available)	As changes occur

## 5.2. Construction Project

Registration and Notices (O.Reg.213/91 s.5-7.1, 13-19)



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## REGISTRATION AND NOTICES

**5. (1)** Before beginning work at a project, each constructor and employer engaged in construction shall complete an approved registration form. O. Reg. 145/00, s. 3.

(2) The constructor shall ensure that,

(a) each employer at the project provides to the constructor a completed approved registration form; and

(b) a copy of the employer's completed form is kept at the project while the employer is working there. O. Reg. 145/00, s. 3.

**6. (1)** This section applies with respect to a project if,

(a) the total cost of labour and materials for the project is expected to exceed,

(i) \$50,000, or

(ii) in the case of a project that is confined to a factory that manufactures or assembles automobiles, \$250,000;


(b) the work is the erection or structural alteration of a building more than two storeys or more than 7.5 metres high;

(c) the work is the demolition of a building at least four metres high with a floor area of at least thirty square metres;

(d) the work is the erection, structural alteration or structural repair of a bridge, an earth-retaining structure or a water-retaining structure more than three metres high or of a silo, chimney or a similar structure more than 7.5 metres high;

(e) work in compressed air is to be done at the project;

(f) a tunnel, caisson, cofferdam or well into which a person may enter is to be constructed at the project;

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(g) a trench into which a person may enter is to be excavated at the project and the trench is more than 300 metres long or more than 1.2 metres deep and over thirty metres long;

(g.1) the work is the construction, over frozen water, slush or wetlands, of an ice road for vehicles, machinery or equipment; or

(h) a part of the permanent or temporary work is required by this Regulation to be designed by a professional engineer. O. Reg. 213/91, s. 6 (1); O. Reg. 345/15, s. 2; O. Reg. 190/19, s. 1 (1).

(2) The constructor shall comply with subsection (3) or (4) before beginning work at the project. O. Reg. 145/00, s. 4.

(3) The constructor shall complete an approved notification form and file it at the Ministry office located nearest to the project or submit it electronically on a website of the government of Ontario. O. Reg. 145/00, s. 4; O. Reg. 242/16, s. 3.

(4) If the constructor believes that the work at the project will not take more than 14 days, the constructor may provide the relevant information to an inspector at the Ministry office located nearest to the project,

(a) by faxing the completed form to the inspector; or

(b) by providing the information that would be required to complete the form to the inspector by telephone. O. Reg. 145/00, s. 4.


(5) Despite subsection (2), the constructor may begin work at a project before complying with subsection (3) or (4) if the following conditions are met:

1. It is necessary to do the work immediately to prevent injury to people or damage to property.

2. Before beginning the work, the constructor gives an inspector notice of the information required in the form by telephone or fax. O. Reg. 145/00, s. 4.

(6) The constructor shall keep the completed notification form posted in a conspicuous place at the project or available at the project for review by an inspector. O. Reg. 145/00, s. 4.

(7) In this section,

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“automobile” includes a van or truck with a gross vehicle weight rating of 14,000 pounds (6,350 kilograms) or less. O. Reg. 190/19, s. 1 (2).

7. If section 6 does not apply to a project but the project includes work on a trench more than 1.2 metres deep into which a worker may enter, the constructor shall, before any work at the project is begun, give notice in person, by telephone or by fax to the Ministry office located nearest to the project. O. Reg. 145/00, s. 5.

7.1 (1) This section applies with respect to a project at which a suspended work platform system is to be used. O. Reg. 242/16, s. 4.

(2) At least 48 hours before a suspended work platform system is used for the first time at a project, the constructor shall complete an approved notification form and provide it to the Ministry by faxing it or delivering it in person to the Ministry office located nearest to the project or submitting it electronically on a website of the government of Ontario. O. Reg. 242/16, s. 4.

(3) Despite subsection (2), the constructor may put a suspended work platform system into use before providing the approved notification form if the following conditions are met:


1. It is necessary to use the suspended work platform system immediately to prevent injury to people or damage to property.

2. Before using the suspended work platform system, the constructor gives an inspector at the Ministry office located nearest to the project oral notice, by telephone or in person, that the system will be used. O. Reg. 242/16, s. 4.

(4) If a constructor uses a suspended work platform system under subsection (3), the constructor shall, within 24 hours of beginning to use the suspended work platform system, provide a completed approved notification form to the Ministry in a manner described in subsection (2). O. Reg. 242/16, s. 4.

(5) The constructor shall keep a copy of the completed notification form in a conspicuous location at the project. O. Reg. 242/16, s. 4.

**8.-12. Revoked: O. Reg. 426/21, s. 1.**

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#### GENERAL REQUIREMENTS

**13.** (1) A constructor shall post in a conspicuous place at a project and keep posted while work is done at the project a notice setting out,

(a) the constructor's name and if the constructor carries on business in a different name, the business name;

(b) the address and telephone number of the constructor's head office or principal place of business in Ontario; and

(c) the address and telephone number of the nearest office of the Ministry.  
O. Reg. 213/91, s. 13 (1); O. Reg. 145/00, s. 9.

(2) Within forty-eight hours after a health and safety representative or joint health and safety committee members are selected for a project, a constructor shall add to the notice the name, trade and employer of the health and safety representative or of each of the committee members. O. Reg. 213/91, s. 13 (2).

**14.** (1) A constructor shall appoint a supervisor for every project at which five or more workers will work at the same time. O. Reg. 213/91, s. 14 (1).


(2) The supervisor shall supervise the work at all times either personally or by having an assistant, who is a competent person, do so personally. O. Reg. 213/91, s. 14 (2).

(3) A supervisor or a competent person appointed by the supervisor shall inspect all machinery and equipment, including fire extinguishing equipment, magazines, electrical installations, communication systems, sanitation and medical facilities, buildings and other structures, temporary supports and means of access and egress at the project to ensure that they do not endanger any worker. O. Reg. 213/91, s. 14 (3).

(4) An inspection shall be made at least once a week or more frequently as the supervisor determines is necessary in order to ensure that the machinery and equipment referred to in subsection (3) do not endanger any worker. O. Reg. 213/91, s. 14 (4).

(5) A competent person shall perform tests and observations necessary for the detection of hazardous conditions on a project. O. Reg. 213/91, s. 14 (5).

**15.** (1) An employer of five or more workers on a project shall appoint a supervisor for the workers. O. Reg. 213/91, s. 15.

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(2) The supervisor shall supervise the work at all times either personally or by having an assistant, who is a competent person, do so personally. O. Reg. 145/00, s. 10.

**16.** At a project, no person younger than 16 years of age shall,

(a) be employed in or about the workplace; or

(b) be permitted to be present in or about the workplace while work is being performed. O. Reg. 145/00, s. 11.

**17.** (1) A constructor shall establish for a project written procedures to be followed in the event of an emergency and shall ensure that the procedures are followed at the project. O. Reg. 145/00, s. 11.

(2) The constructor shall review the emergency procedures with the joint health and safety committee or the health and safety representative for the project, if any. O. Reg. 145/00, s. 11.


(3) The constructor shall ensure that the emergency procedures are posted in a conspicuous place at the project. O. Reg. 145/00, s. 11.

**18.** The constructor shall ensure that every worker at the project has ready access to a telephone, two-way radio or other system of two-way communication in the event of an emergency. O. Reg. 145/00, s. 11.

**19.** If, under this Regulation, a record is required to be kept available for inspection at a project, the constructor or employer, as the case may be, shall keep the record for at least one year after the project is finished. O. Reg. 213/91, s. 19.

### 5.3. Legislation Identification


Senior Management, and/or Designated Management Review Team shall identify all Legislation, Regulations, and standards applicable to the organization based on a review of scope of work and/or consult subject matter expert. The Legislative Register table below may be used as a reference for determining applicable Legislation, Regulations and Standards. However, it may be noted that the table below is an indicative list and not exhaustive.

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(a) Main Legislative Directory

TABLE 1.1

<b>Occupational Health and Safety Act, R.S.O.1990</b> <a href="https://www.ontario.ca/laws/statute/90o01">https://www.ontario.ca/laws/statute/90o01</a> <b>Regulations under the Occupational Health and Safety Act</b>	
<b>O. Reg. 420/21</b>	NOTICES AND REPORTS UNDER SECTIONS 51 TO 53.1 OF THE ACT - FATALITIES, CRITICAL INJURIES, OCCUPATIONAL ILLNESSES AND OTHER INCIDENTS
<b>O. Reg. 381/15</b>	NOISE
<b>O. Reg. 297/13</b>	OCCUPATIONAL HEALTH AND SAFETY AWARENESS AND TRAINING
<b>O. Reg. 33/12</b>	OFFICES OF THE WORKER AND EMPLOYER ADVISERS
<b>O. Reg. 490/09</b>	DESIGNATED SUBSTANCES
<b>O. Reg. 474/07</b>	NEEDLE SAFETY
<b>O. Reg. 632/05</b>	CONFINED SPACES
<b>O. Reg. 414/05</b>	FARMING OPERATIONS
<b>O. Reg. 278/05</b>	DESIGNATED SUBSTANCE - ASBESTOS ON CONSTRUCTION PROJECTS AND IN BUILDINGS AND REPAIR OPERATIONS
<b>O. Reg. 385/96</b>	JOINT HEALTH AND SAFETY COMMITTEES - EXEMPTION FROM REQUIREMENTS
<b>O. Reg. 243/95</b>	CRITERIA TO BE USED AND OTHER MATTERS TO BE CONSIDERED BY THE BOARD UNDER SUBSECTION 46 (6) OF ACT
<b>O. Reg. 714/94</b>	FIREFIGHTERS - PROTECTIVE EQUIPMENT
<b>O. Reg. 629/94</b>	DIVING OPERATIONS
<b>O. Reg. 67/93</b>	HEALTH CARE AND RESIDENTIAL FACILITIES
<b>O. Reg. 213/91</b>	CONSTRUCTION PROJECTS
<b>R.R.O. 1990, Reg. 861</b>	X-RAY SAFETY
<b>R.R.O. 1990, Reg. 860</b>	WORKPLACE HAZARDOUS MATERIALS INFORMATION SYSTEM (WHMIS)

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<b>R.R.O. 1990, Reg. 859</b>	WINDOW CLEANING
<b>R.R.O. 1990, Reg. 858</b>	UNIVERSITY ACADEMICS AND TEACHING ASSISTANTS
<b>R.R.O. 1990, Reg. 857</b>	TEACHERS
<b>R.R.O. 1990, Reg. 856</b>	ROLL-OVER PROTECTIVE STRUCTURES
<b>R.R.O. 1990, Reg. 855</b>	OIL AND GAS - OFFSHORE
<b>R.R.O. 1990, Reg. 854</b>	MINES AND MINING PLANTS
<b>R.R.O. 1990, Reg. 851</b>	INDUSTRIAL ESTABLISHMENTS
<b>R.R.O. 1990, Reg. 833</b>	CONTROL OF EXPOSURE TO BIOLOGICAL OR CHEMICAL AGENTS
<b>O. Reg. 559/22</b>	NALOXONE KITS

TABLE 1.2

<b>Workplace Safety and Insurance Act, 1997</b> <a href="https://www.ontario.ca/laws/statute/97w16">https://www.ontario.ca/laws/statute/97w16</a> <b>Regulations under the Workplace Safety and Insurance Act</b>	
<b>O. Reg. 665/21</b>	CALCULATION OF 2022 PREMIUMS
<b>O. Reg. 141/12</b>	INSURANCE FUND
<b>O. Reg. 454/09</b>	PRESCRIBED TEMPORARY INDEXING FACTOR
<b>O. Reg. 47/09</b>	CONSTRUCTION SECTOR - EXEMPTIONS (PARTNERS AND EXECUTIVE OFFICERS)
<b>O. Reg. 35/08</b>	RETURN TO WORK AND RE-EMPLOYMENT - CONSTRUCTION INDUSTRY
<b>O. Reg. 253/07</b>	FIREFIGHTERS
<b>O. Reg. 562/99</b>	BENEFIT FOR LOSS OF RETIREMENT INCOME
<b>O. Reg. 175/98</b>	GENERAL
<b>O. Reg. 456/97</b>	FUNCTIONAL ABILITIES FORM
<b>R.R.O. 1990, Reg.1101</b>	FIRST AID REQUIREMENTS

TABLE 1.3



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<b>OTHER LEGISLATIVE REFERENCES</b>	
<b>O. Reg. 332/12</b>	BUILDING CODE, under Building Code Act, 1992
	EMPLOYMENT STANDARDS ACT, 2000
<b>O. Reg. 213/07</b>	FIRE CODE, under Fire Protection and Prevention Act, 1997
<b>O. Reg. 199/07</b>	COMMERCIAL MOTOR VEHICLE INSPECTIONS, under Highway Traffic Act, R.S.O. 1990
<b>O. Reg. 611</b>	SAFETY INSPECTIONS, under Highway Traffic Act, R.S.O. 1990

(b) Job specific Legislative Directory


TABLE 1.4

Legislation	Applicable to	Topic
<b>Occupational Health and Safety Act, R.S.O.1990</b> <a href="https://www.ontario.ca/laws/statute/90o01">https://www.ontario.ca/laws/statute/90o01</a>		
s. 23- 32	All Workplace Parties	Duties of employers and other persons
s. 32.0.1 – 32.0.8	All Workplace Parties	Workplace Violence and harassment
s. 33-42	Operations that use toxic substances	Toxic Substances
s. 43-49	Worker	Right to Refuse or Stop work where Health and Safety is in Danger
s. 50-50.1	Employer	Reprisals by Employer Prohibited
s. 51-53.1	All Workplace Parties	Notices (Death, Injury, Accidents etc.)
s. 54-65	Inspectors	Enforcement
s. 66-69	All Workplace Parties	Offences and Penalties
<b>Construction Projects Regulation O.Reg 213/91</b> <a href="https://www.ontario.ca/laws/regulation/910213">https://www.ontario.ca/laws/regulation/910213</a>		
O. Reg 213/01	All Projects	
s. 21-27	All Workplace Parties	Protective Clothing, Equipment and Devices
s. 28-30	All Workplace Parties	Hygiene




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Legislation	Applicable to	Topic
s. 31-34	All Workplace Parties	General Requirements for Project Structures and building
s. 49-51	All Workplace Parties	Temporary Heat
s. 52-58	All Workplace Parties	Fire Safety
s. 59-60.63	All Workplace Parties	Dust Control
s. 64-66	All Workplace Parties	Public Way Protection
s. 67-69.1	All Workplace Parties	Traffic Control
s. 70-72	All Workplace Parties	Access to and Egress from Work Areas
s. 73-74	All Workplace Parties	Platforms, Runways and Ramps
s. 75-77	All Workplace Parties	Stairs and Landings
s. 78-85., 86	All Workplace Parties	Ladders
s. 87-92	All Workplace Parties	Forms, Formwork, Falsework and Re-shoring
s. 93-116	All Workplace Parties	General guidance on Equipment
s. 117-121	All Workplace Parties	Explosive Actuated Fastening Tool
s. 122-124	All Workplace Parties	Welding and Cutting
s. 125	All Workplace Parties	Access to Heights
s. 126-136.0.1	All Workplace Parties	Scaffolds and Platforms
s. 136.1-142.06	All Workplace Parties	Suspended Work Platform and Boatswain's Chairs
s. 142.1-142.8	All Workplace Parties	Multi-point Suspended Work Platform
s. 143-149	All Workplace Parties	Elevating Work Platforms
s. 150-156	All Workplace Parties	Cranes, Hoisting and Rigging
s. 156.1-156.9	All Workplace Parties	Rotary Foundation Drill Rigs
s. 157-165	All Workplace Parties	Tower Cranes
s. 166-167	All Workplace Parties	Derricks, Stiff-Leg Derricks, and Similar Hoisting Devices
s. 168-180	All Workplace Parties	Cables, Slings, Rigging
s. 181-195.3	All Workplace Parties	Electrical Hazards
s. 196-206	All Workplace Parties	Explosive
s. 207-210	All Workplace Parties	Roofing

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Legislation	Applicable to	Topic
s. 211	All Workplace Parties	Hot Tar or Bitumen Road Tankers
s. 212-221	All Workplace Parties	Demolition and Damaged Structures
s. 222-242	Excavating and Trenching Operations	Entry and Working Alone, Soil Types, Precautions Concerning Service and Adjacent Structures, Support systems and general requirements
s. 243-331	Operations in Tunnels, shafts, caissons, and cofferdams	Land requirements, notices, explosives, hazards, and controls
s. 332-399	Work done with Compressed Air	Communications, Controls, Medical Requirements, Lock Tenders, Decompression Procedures
<b>Industrial Establishment Regulation, O. Reg. 851</b>		
<a href="https://www.ontario.ca/laws/regulation/900851">https://www.ontario.ca/laws/regulation/900851</a>		
O. Reg 851	All Industrial Establishments	
s. 5	All Industrial Establishments	Notice of Accidents
s. 6	All Industrial Establishments	Retention of Reports and Records
s. 7-8	All Industrial Establishments	Pre-start Health and Safety Review
s. 9-10	All Industrial Establishments	Fees and Forms
s. 11-20	All Industrial Establishments	Premises
s. 21	All Industrial Establishments	Lighting
s. 22-23	All Industrial Establishments	Fire Prevention – Protection
s. 24-44.2	All Industrial Establishments	Machine Guarding
s. 45-	All Industrial Establishments	Material Handling
s. 72-78	All Industrial Establishments	Maintenance and Repairs

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Legislation	Applicable to	Topic
s. 79-86	All Industrial Establishments	Protective Equipment
s. 87-102	All Industrial Establishments	MLITSD ten Material
s. 103-119	All Industrial Establishments	Logging
s. 120-123	All Industrial Establishments	Buildings  **Does not apply to industrial establishments in respect to access, exit, structural adequacy, washrooms, service rooms, fire-resistance rating of a separation, fire protection rating of a closure
s. 124-139	All Industrial Establishments	Industrial Hygiene
<b>Technical Standards and Safety Act</b> <a href="https://www.ontario.ca/laws/statute/00t16">https://www.ontario.ca/laws/statute/00t16</a>		
<b>O. Reg. 220/01</b>	Industry handling Boilers, Pressure Vessels, and fuels	BOILERS AND PRESSURE VESSELS
<b>O. Reg. 217/01</b>	Industry handling Boilers, Pressure Vessels, and fuels	LIQUID FUELS
<b>O. Reg. 214/01</b>	Industry handling Boilers, Pressure Vessels, and fuels	COMPRESSED GAS
<b>O. Reg. 213/01</b>	Industry handling Boilers, Pressure Vessels, and fuels	FUEL OIL
<b>O. Reg. 212/01</b>	Industry handling Boilers, Pressure Vessels, and fuels	GASEOUS FUELS
<b>O. Reg. 211/01</b>	Industry handling Boilers, Pressure Vessels, and fuels	PROPANE STORAGE AND HANDLING

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## 6 Legislative Compliance Evaluations

The Legislation register will include all applicable Legislations, Regulation, and requirements from standards. The management team will tabulate list of evidence against each applicable Legislation, Regulation, and Standards. This list of evidence would be reviewed by the management team to ensure compliance.

Health and Safety Coordinator will conduct a Legislative Compliance Evaluation using **Legislative Compliance Evaluation Checklist**, minimum annually.

Health and Safety Coordinator shall ensure that all documentation related to legislation, regulations, standards, and any other requirement are up to date. The records of evaluations are retained for 3 years.

The output of the legislative compliance evaluation (**Legislative Compliance Evaluation Checklist**) is assessed as part of the management review. The management team is responsible for:


- Updating the list of Legislative Requirements.
- Conducting the review of legislative requirements to ensure compliance.
- Retain records of the review.

## 7 Roles and Responsibilities

Responsibilities and accountabilities of workplace parties ensures a commitment by workplace parties ensuring a safe and healthy work environment. The responsibilities of workplace parties are outlined as per the Organization Chart and listed below with the specific roles within the organization.

### 7.1. Senior Management

- Take all reasonable precautions to protect the health and safety of workers.
- Develop and implement an occupational health and safety program aligning with legislative requirement
- Ensure to evaluate ongoing review for compliance for applicable legislation.
- Review Legislative Compliance Evaluation as part of Management review and ensure that are up to date.
- Comply with all applicable acts and regulations made under the provincial and federal laws
- Communicate the up-to-date information to all workplace parties

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- Provide information, instruction, and supervision to protect worker health and safety; and
- Co-operate with the JHSC (if applicable)
- Develop and implement an occupational health and safety program and policy.
- Post a copy of OHSA in the workplace; and any explanatory material prepared by the MLITSD in the workplace; and Provide health and safety reports to the JHSC (if applicable)
- Designate a personnel for the administration of legislative and other requirements

## 7.2. Supervisors

- Ensure all legislative postings are available to relevant workplace parties
- Communicate the up-to-date information to all workplace parties
- Comply with all applicable acts and regulations made under the provincial and federal laws
- Ensuring workers work in compliance with required protective devices, measures, and procedures
- Ensuring workers use or wear any equipment, protective device or clothing required by the employer
- Advising workers of any potential or actual health or safety danger known by the supervisor
- Providing workers, when required, with written instructions on any measures and procedures to be taken for the workers' protection
- Taking every precaution reasonable in the circumstances for a worker's protection
- Ensure supervision of the work on the project at all times, either personally or by having an assistant who is a competent person do so when the supervisor is unavailable
- Inspecting or having the supervisor's assistant inspect, at least once a week, all machinery and equipment, including fire extinguishing equipment, magazines (storage for flammables and explosives), electrical installations, communications systems, sanitation and medical facilities, buildings and other structures, temporary supports and means of access and egress at the project to ensure worker safety.

## 7.3. Health and Safety Coordinator

- Responsible for administration of legislative and other requirements.

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- Conduct Legislative Compliance Evaluation minimum annually.
- Update references as per the changes occur.
- Communicate the changes to applicable workplace parties.

#### 7.4. Workers

- Comply with all applicable acts and regulations made under the provincial and federal laws
- Report any known workplace hazard or violation of the Act to the employer or supervisor

## 8 Related Documents/Forms

- JHA Library
- Jobsite Document Checklist
- Legislation Register Table
- MLITSD Health and Safety Checklist
- Legislative Compliance Evaluation Checklist
- Master Documented Information

## 9 Document and Record Maintenance


Documents and Records are maintained as per **BESTCO-PRO-01.2-Document and Record Control Procedure**.

## 10 Record Retention


Records are to be retained for a minimum of 3 years. Records will remain legible and readily identifiable.

## 11 Legislated/Other References

- Applicable Acts and Regulations (Table 1.1-1.4)
- WSIB First Aid Guidelines -  
<https://www.wsib.ca/sites/default/files/documents/2019-01/faeng.pdf>
- Technical Standards & Safety Authority (TSSA) Guidelines -  
<https://www.tssa.org/en/index.aspx>
- Ministry of Transport (MTO) Guideline -  
<http://www.mto.gov.on.ca/english/publications/index.shtml>
- Commercial Vehicle Operators' Safety Manual

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- <http://www.mto.gov.on.ca/english/trucks/commercial-vehicle-operators-safety-manual/>

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## Legislation Policy

The purpose of the Legislation program is to have a system to establish, implement, monitor, and maintain compliant company documentation and work processes. Procedure will provide guidelines for identify and complying with applicable legislation. Bestco Construction Ltd. is committed to ensuring all workplace parties understand Ontario workplace legislation enforced by Ministry of Labour, Immigration, Training and Skills Development (MLITSD).

Senior Management is committed to providing the necessary budget, time, and resource for ensuring the implementation of the program. Bestco Construction Ltd. integrates legislation throughout their entire work process. Bestco Construction Ltd. workplace parties will utilize the legislations, regulations and standards requirements in job planning, training, management of change and document and control activities.

The on-going compliance of company operations to laws and regulations will be reviewed at a minimum annually before conducting the Management Review. Supervisors will be responsible for monitoring workers to ensure all workers are working in compliance to applicable laws and regulations. All workers and subcontractors of Bestco Construction Ltd. are required to understand and work in compliance with applicable legislation.

The program shall be reviewed annually for sustainability, adequacy, and effectiveness.



Name: Michael Zaborsky


Title: President

Company: Bestco Construction (2005) Ltd.

Sept. 2, 2025


Date: 02 September, 2025



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# Joint Health and Safety Committee Procedure

<b>Version No.</b>	<b>Reason for Revision:</b>	<b>Developed By and Date:</b>	<b>Reviewed By and Date:</b>	<b>Approved By and Date:</b>
1	To meet COR 2020 Standards, company's health and safety processes and Ontario's Health and Safety Legislative Requirements.	Emma Lisson, Health and Safety Coordinator 11 July, 2025	Michael Zaborsky and Ovidiu Cotiga, Senior Management 18 August, 2025	Michael Zaborsky, President 02 September, 2025


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## 1 Purpose

This procedure provides the basic guidelines necessary to have an effective Joint Health and Safety Committee (JHSC) at Bestco Construction Ltd. The Occupational Health and Safety Act is built upon the principle that workers and employer work together to ensure that the working environment is safe and that provincial standards are met. This is achieved with the assistance of the Joint Health and Safety Committee member representatives.

The procedure defines the purpose, role, powers, and responsibilities of the committee and ensure that the joint health and safety committee is functioning with a clear mandate to implement the principle of shared responsibilities of management and workers.

## 2 Scope

The procedure applies to the Joint Health and Safety Committee of Bestco Construction Ltd when having the Joint Health and Safety Committee is applicable. It also applies to the construction projects where Bestco Construction Ltd. is a constructor with twenty or more regularly employed workers, and the work is expected to last more than three months.

## 3 Definitions


**Certified Member:** A Joint Health and Safety Committee (JHSC) member who has fulfilled the Chief Prevention Officer's (CPO) requirements to become certified. This includes training and other requirements the CPO deems necessary [Ref. OHSA].

**Compliance:** Meeting all requirements outlined within applicable legislation and regulations. [Ref. COR 2020 Audit Handbook].

**Contractor:** A person or organization providing services to another organization in accordance with agreed upon specification, terms, and conditions. [Ref. COR 2020 Audit Handbook].

- A subcontractor is a person or organization that takes a portion of a contract from the principal contractor or another subcontractor

**Constructor:** A person who undertakes a project for an owner and includes an owner who undertakes all or part of a project by himself or by more than one employer. [Ref. OHSA].

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**Corrective Action:** Action to eliminate the cause of a non-conformity and to prevent recurrence. There can be more than one cause for a non-conformity. Document: Medium containing information related to the OHSMS. [Ref. COR 2020 Audit Handbook].

**Critically Injured:** 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 a major portion of the body, or
- g) causes the loss of sight in an eye;

[Ref O. Reg 420/21: Notices and Reports under Section 51 to 53.1 of the Act – Fatalities, critical injuries, occupational illnesses, and other incidents under the OHSA].

**Document:** Medium containing information related to the OHSMS. [Ref. COR 2020 Audit Handbook].


**Employer:** A person who employs one or more workers or contracts for the services of one or more workers and includes a contractor or subcontractor who performs work or supplies services and a contractor or subcontractor who undertakes with an owner, constructor, contractor, or subcontractor to perform work or supply services [Ref. OHSA].

**Hazard:** Source, situation, or act with a potential for harm in terms of human injury. [Ref. COR 2020 Audit Handbook].

**Health and Safety Representative:** A worker that brings awareness to safety concerns and facilitates communication between the constructor, supervisor, and the workers regarding safety. In workplaces, including construction projects, at which the number of workers regularly exceeds five and at which no joint health and safety committee is required. [Ref. OHSA].

**Incident:** Work related event(s) in which an injury, fatality or occupational illness occurred; and includes event(s) where no injury or illness occurred, such as a near hit or property damage. [Ref. COR 2020 Audit Handbook].

**Interested Parties:** Persons or groups, inside or outside the workplace, concerned with or affected by OHS performance of an organization. [Ref. COR 2020 Audit Handbook].

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**Joint Health and Safety Committee (JHSC):** An advisory body composed of worker and management representatives that are committed to improving health and safety conditions in the workplace. A joint health and safety committee is required at workplace,

- a) at which twenty or more workers are regularly employed;
- b) with respect to which an order to an employer is in effect;
- c) other than a construction project where fewer than twenty workers are regularly employed, with respect to which a regulation concerning designated substances applies.

This requirement does not apply to a constructor at a project at which work is expected to last less than three months [Ref. OHSA].

**Legal Requirements:** All applicable legislation, including but not limited to the Occupational Health and Safety Act and its regulations [Ref. COR 2020 Audit Handbook].

**Management:** People who have care and control over people and/or processes [Ref. COR 2020 Audit Handbook].

- **Middle Management (Project Manager, Office Manager, etc.):** A group of managers who administers and/or supervises the affairs of a department or division at the level below senior management of the company or organization.

**Non-conformity:** Non-fulfillment of a requirement [Ref. COR 2020 Audit Handbook].


**Organization:** Company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public, or private, that has its own functions, management, and administration. [Ref. COR 2020 Audit Handbook].

**Other Requirements:** Requirements or provisions the organization subscribes, however are not legally binding, such as industry standards. [Ref. COR 2020 Audit Handbook].

**Owner:** Includes a trustee, receiver, mortgagee in possession, tenant, lessee, or occupier of any lands or premises used or to be used as a workplace, and a person who acts for or on behalf of an owner as an agent or delegate. [Ref. OHSA].

**Participation:** Involvement of workers, or worker representatives, in decision-making process(es) regarding the OHSMS. [Ref. COR 2020 Audit Handbook].

**Plan:** Detailed method for doing or achieving something. [Ref. COR 2020 Audit Handbook].

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**Policy:** A policy is a general commitment, direction or intention and is formally stated by top management. A quality policy statement should express top management's commitment to the implementation and improvement of its management system. [Ref. COR 2020 Audit Handbook].

**Preventative Action:** Action to eliminate the cause of potential non-conformity or other potential undesirable potential situation. There can be more than one cause for a potential nonconformity. (For the purposes of this Standard, this refers to any action taken to fix a potential OHS problem.) [Ref. COR 2020 Audit Handbook].

**Procedure:** A documented, specified method to carry out an activity. **Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].

**Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].

**Project:** a construction project, whether public or private, including,

- the construction of a building, bridge, structure, industrial establishment, mining plant, shaft, tunnel, caisson, trench, excavation, highway, railway, street, runway, parking lot, cofferdam, conduit, sewer, watermain, service connection, telegraph, telephone or electrical cable, pipe line, duct or well, or any combination thereof,
- the moving of a building or structure, and
- any work or undertaking, or any lands or appurtenances used in connection with construction.


[Ref. OHSA].

**Record:** Document stating results achieved or providing evidence of activities performed. [Ref. COR 2020 Audit Handbook].

**Senior Management (Company President, Vice President of Operations):** Person(s) at the highest level of an organization's structure responsible for leading, managing and /or directing an organization's day-to-day activities and/or operations. [Ref. COR 2020 Audit Handbook].

**Supervisor:** A person who has charge of a workplace or authority over a worker [Ref. OHSA].

**Trade Union:** means a trade union as defined in the Labour Relations Act, 1995 that has the status of exclusive bargaining agent under that Act in respect of any bargaining unit or

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units in a workplace and includes an organization representing workers or persons to whom this Act applies where such organization has exclusive bargaining rights under any other Act in respect of such workers or persons [Ref. OHSA].

**Worker:** Any of the following, but does not include an inmate of a correctional institution or like institution or facility who participates inside the institution or facility in a work project or rehabilitation program:

- a) A person who performs work or supplies services for monetary compensation.
- b) A secondary school student who performs work or supplies services for no monetary compensation under a work experience program authorized by the school board that operates the school in which the student is enrolled.
- c) A person who performs work or supplies services for no monetary compensation under a program approved by a college of applied arts and technology, university, private career college or other post-secondary institution.
- e) Such other persons as may be prescribed who perform work or supply services to an employer for no monetary compensation.

[Ref. OHSA].

**Workplace:** any land, premises, location, or thing at, upon, in or near which a worker works. [Ref. OHSA].

**Workplace Harassment:** means,

- a) 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
- b) workplace sexual harassment

[Ref. OHSA].


**Workplace Parties:** Includes, but is not limited to, the employer, supervisor(s), workers, constructor, visitors, and owner. [Ref. COR 2020 Audit Handbook].

**Workplace Sexual Harassment:** means,

- a) 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, or
- b) 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

[Ref. OHSA].



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**Workplace Violence:** means,

- 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 the worker,
- c) a statement or behaviour that it 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

[Ref. OHSA].

## 4 Terms of Reference

### 4.1. Purpose and Mission of the JHSC


The primary purpose and mission of the JHSC is to monitor, assist and support the Internal Responsibility System (IRS). This is best accomplished when the JHSC fulfills its essential role of identifying weaknesses in the company's IRS and recommends solutions that enable all parties to understand, accept and carry out their individual and collective responsibilities for health and safety. The JHSC will endeavour to make recommendations that establish, implement, monitor, evaluate and improve company policies, programs, and procedures. An effective JHSC ensures that any weaknesses in the company's chain of internal responsibility are identified, and that the attention remains focused on these weaknesses until they are addressed and resolved.

### 4.2. Selection of JHSC Member and Co-Chairs

Worker representatives on the JHSC are to be selected by the workers who do not exercise managerial functions. Bestco Construction Ltd. shall select the remaining members of a committee from persons who exercise managerial functions for the employer. Two members of the committee will co-chair the committee, one of whom will be selected by the members who represent workers and the other of whom will be selected by the members who exercise managerial function.

### 4.3. Structure of the Company JHSC

Bestco Construction Ltd. Senior Management shall ensure that a JHSC is set up when twenty or more workers are regularly employed in the organization.

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The JHSC shall consist of at least two members (one worker and one management) when fewer than fifty workers are regularly employed and at least four members (two worker and two management) when fifty or more workers are regularly employed.

#### 4.4. Structure of the Project JHSC


Duration of Project Site	Workforce	Minimum Requirements
Any	6-19	Health and Safety Representative elected by workers
3 months or more	20-49	JHSC with at least one worker representative elected by workers, if applicable, and one management member appointed by management.
3 months or more	50+	JHSC with at least two workers elected by workers, if applicable, and two management members appointed by management. Worker Trades Committee with workers from each trades.

The names and work locations of the committee members shall be posted in a conspicuous place or places where they are most likely to come to the attention of the workers. This list shall be updated as changes occur.

#### 4.5. Functions of the JHSC


In accordance with the Occupational Health and Safety Act, the JHSC is established to:

- conduct meetings according to an established schedule.
- conduct monthly workplace inspections.
- receive and review all incident, inspection and health and safety audit reports and to make recommendations, as necessary.
- receive and review all health and safety-related test results and to make recommendations, as necessary.
- operate on the principle of consensus-building when reaching decisions.
- make written recommendations to the employer, as necessary.

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- have members accompany Safety Association representatives or Ministry of Labour, Immigration, Training and Skills Development (MLITSD) Health and Safety Inspectors as required.
- investigate incidents, injuries or occupational illnesses as required.
- report findings of investigations to the MLITSD and management as required.
- assist and promote the development of company health and safety policies, programs, procedures, and best practices.
- obtain information from the employer regarding potential or actual workplace hazards.
- obtain information from the employer regarding statistics, trends, records, processes, or any other information that may help it to fulfill its mandate.
- always work in compliance with legislation, company health and safety policies, programs, procedures, and industry best practices.
- assist in hazard assessment of new or modified facilities, processes, procedures, equipment, devices, and materials.
- monitor the effectiveness of the Internal Responsibility System and its own effectiveness on an ongoing basis through various auditing programs.
- encourage adequate education and training programs in order that all employees are knowledgeable in their rights, restrictions, responsibilities, and duties under the Occupational Health and Safety Act.
- evaluate all newly introduced potential hazards (i.e., machinery and/or chemicals) and communicate the hazard potentials to respective Management, prior to their use.
- develop and implement with Management, training programs for all newly introduced hazards and participating in the development and delivery of health and safety training programs.
- be present during an occupational hygiene testing if required at the workplace.
- advise the selection of the personal protective equipment.
- address matters related to Designated Substances Regulations and WHMIS, where applicable.
- address any workplace harassment incident if it is brought to the committee.
- review these terms of reference at least annually or sooner if required.
- carry out any other duties and functions as prescribed by the legislation.

#### 4.6. Quorum

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Both co-chairs should be present at every meeting and the management representatives must be not more than worker members.

#### 4.7. JHSC Meetings

JHSC meetings are to be held at least every 3 months on a specific date and time, which will be decided as a committee. Records of the recent meeting must be posted on the health and safety board.

Meetings shall address a number of issues including the analysis of first aid records, accident investigation reports, hazard/near miss reports, and the hazards identified on the JHSC tour. In addition, meetings may include the review of minutes to the last JHSC meeting, applicable training records, hygiene surveys, safety/safety talk meeting minutes, health or safety related disciplinary action, repeat items, as well as any other items that may arise.

A co-chair may, with the consent of his/her counterpart, invite any additional person(s) to attend the meeting to provide additional information and comments. However, this individual(s) shall not participate in the regular business of the meeting unless asked to do so.

#### 4.8. Minutes of Meetings


The committee will designate a secretary for the meeting to take minutes and be responsible for having the minutes typed, filed, and circulated within 5 working days of the meeting, or as the committee may from time to time instruct. The secretary will use the **JHSC Meetings Minutes**. Minutes of the meetings will be reviewed and edited, where necessary, by the co-chairs. They will then be approved and circulated to all committee members.

#### 4.9. Payment of Attending Meetings

All time spent in attendance at committee meetings or in activities relating to the function of the committee will be paid for at the members' current rate of pay for performing work, and the time spent shall be considered as time at work.

#### 4.10. Meeting Agenda

The co-chair will prepare an agenda using the **JHSC Meeting Agenda Form** and will forward a copy of the agenda to all committee members prior to the meeting. The committee may accept any item as proper for discussion and resolution pertaining to health and safety. All items raised from the agenda in meetings will be

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dealt with on the basis of consensus rather than voting. Formal motions will not be used. All items will be reported in the minutes. Unresolved items will be recorded and placed on the agenda for the next meeting.

#### 4.11. Workplace Inspection

A worker representative of the JHSC will inspect the workplace once a month using **Monthly Inspection Form**. A management member may take part of the inspection based on the schedule.

#### 4.12. JHSC Certification

Company shall have minimum two members (one worker and management) certified. Senior Management will ensure the certification training is delivered by a training provider, approved by the Chief Prevention Officer, MLITSD.

Where a project regularly employs 50 or more workers, the JHSC on the project must have at least one member representing workers and one member representing the constructor, who are certified members. If no members of a health and safety committee are certified, the workers and constructor must each select one member of the committee to become certified.

If a certified member resigns, steps shall be taken to ensure that the requirement for a certified member is met.


#### 4.13. Required Trainings for all other non-certified JHSC Members

In addition to the legislated requirement requiring one worker member and one management member of the JHSC receive certification training, all other JHSC members are required to take the following training that pertains to their legislated responsibilities:

- Accident Investigation
- Workplace Inspection
- Emergency Response

#### 4.14. Confidentiality of Information

JHSC members are required by the Occupational Health and Safety Act to keep confidential any personal medical details or other sensitive information they receive. This means paying strict attention to the security of committee records. In order for

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the committee to function properly, all parties must be confident and trust that no improper use will be made of the information received.

#### **4.15. Responding to Unsafe Conditions or Practices**

One of the most important legislated functions of the JHSC is to develop recommendations to control hazards or address safety concerns at the workplace. Certified members of the JHSC have the authority to investigate and act upon dangerous circumstances that require immediate attention. Individual committee members may identify hazards during monthly inspections, incident investigations or through daily worker contacts. However, because committee members are workers under the legislation, they first have a legal duty to report any hazards or contravention they become aware of to their supervisor.

#### **4.16. Notice of Incident and Accident Investigation**

Where there is a fatality or critical injury, the JHSC will be notified immediately of the occurrence by telephone or other direct means.

All other incidents inclusive of occupational illness will be informed to JHSC as appropriate (Refer to Accident Reporting and Investigations Procedure).

All accidents, injuries and incidents will be reviewed and discussed by the committee during the regular meeting to explore if anything can be done to prevent any similar occurrences in the future.

In the event of a fatality or critical injury, one or more worker members of the committee will be designated to investigate the incident along with management (Refer to the First Aid, Incident, Accident Reporting and Investigation Procedure for further details)


#### **4.17. Accompaniment**

The committee will designate a worker member to accompany a MLITSD inspector while carrying out a Ministry inspection of the workplace.

#### **4.18. Work Refusals**

A committee member, who represents workers, must be present during the employer or supervisor's investigation of a work refusal.

#### **4.19. Formal Written Recommendations**

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The JHSC will be required to submit formal written recommendations to control hazards at the workplace. Recommendations can be based on the following:

- Workplace Inspections
- Observations
- Discussions
- Review of training programs
- Worker request or concerns

In developing recommendations, the committee must complete the **Joint Health and Safety Committee Management Recommendation Form**, which will meet the following criteria:

1. Define the hazard
2. Collect all necessary information
  - Description of the process and workplace layout.
  - History/details of previous accident and investigations.
  - Comments and suggestions from supervisors and workers in the area concerned.
  - Maintenance schedules and manufacturers specifications.
3. Consider possible solutions, taking into account:
  - The actual and potential seriousness of the problem.
  - The range of possible solutions.
  - The practicality of the solution being recommended.


In submitting recommendations, the recommendation must meet the following criteria:

4. Submitted by either co-chair of the committee upon final agreement by the committee.
5. Submitted to senior management.
6. Submitted within one week of the JHSC meeting at which the recommendation was decided upon.

Senior management has to send written communication directly to the co-chairs within 21 days in regard to recommendations of the committee included in the minutes. This can be done by giving an assessment of the problem(s) and outlining who is responsible for resolving the matter, along with a timeframe in which the matter will be resolved.

#### **4.20. Consultation on industrial hygiene testing**



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The committee will be consulted with respect to proposed testing strategies for investigating industrial hygiene at the workplace. Senior Management will provide information to JHSC concerning testing strategies to be used to investigate industrial hygiene at the workplace. Committee member representing workers is entitled to be present at the beginning of testing conducted with respect to industrial hygiene at the workplace if the member believes his or her presence is required to ensure that valid testing procedures are used or to ensure that the test results are valid.

#### **4.21. Access to annual summary**

Upon request, an annual summary of data relating to the company in respect to the number of work accident fatalities, the number of lost work day cases, the number of lost work days, the number of non-fatal cases that required medical aid without lost work days, the incidence of occupational illnesses, the number of occupational injuries, and such other data will be provided by Workplace Safety and Insurance Board (WSIB).

#### **4.22. Workplace Violence and Harassment Program**

Senior Management shall advise the JHSC of the results of violence risk assessment and provide a copy if the assessment is in writing.

Senior Management shall, in consultation with the JHSC develop and maintain a written program to implement the workplace harassment policy.

#### **4.23. Order of Director**


When there is a biological, chemical, or physical agent or combination of such agents is used or intended to be used in the workplace and its presence in the workplace or the manner of its use is in the opinion of a Director is likely to endanger the health of a worker, the Director shall provide notice in writing to the employer. A copy of the order shall be provided to JHSC.

#### **4.24. Information of hazardous material**

A copy of every current safety data sheet in respect to hazardous materials must be provided to the JHSC. An employer shall consult with the committee and the health and safety representative, if any, on making safety data sheets available in the workplace or furnishing them as required.

Copy of any assessment related to biological and/or chemical agents must be provided to JHSC.



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If a hazardous physical agent is produced in the workplace, the information must be provided to the JHSC. The instruction and training shall be developed, implemented, and reviewed in consultation with the JHSC.

#### 4.25. Obstruction of committee

No person shall knowingly,

- hinder or interfere with a committee or a committee member in the exercise of power or performance of a duty under the Act
- furnish a committee or a committee member with false information in the exercise of power or performance of a duty under the Act

#### 4.26. General

All workers will be encouraged to discuss their problems with their supervisor before bringing it to the attention of the committee.

- Committee members will thoroughly investigate all complaints to get all the facts and will exchange these facts when searching for a resolution of the problem. All problem resolutions will be reported in the minutes.
- Medical or trade secret information will be kept confidential by all committee members.

#### 4.27. Amendments to these Guidelines


Any amendments, deletions or additions to these guidelines must have the consensus of the total committee and shall be set out in writing and attached as an appendix to these guidelines

## 5 Roles and Responsibilities

Responsibilities and accountabilities of workplace parties ensures a commitment by workplace parties ensuring a safe and healthy work environment. The workplace parties have been outlined and defined as per the Organization Chart. Responsibilities are listed below with the specific roles within the organization.

### 5.1. Senior Management

- Providing assistance and co-operation where necessary to the committee to carry out its role.

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- Respond to written recommendations to the committee within 21 days. The response must include corrective action time and dates, or reasons for disagreement of recommendations.
- Provide required health and safety information of the workplace.

## 5.2. Supervisors

- All supervisors, who are not committee members, shall attend at least one JHSC meeting per year and at least one JHSC inspection per year.
- Set an example by being consistently safety conscious and insisting on the safe performance of work.
- Observe the work in progress and provide positive input to the workers.
- Be involved in ongoing hazard assessment.
- Participate in the development and review of safe work practices and procedures.
- Take every precaution reasonable in the circumstances for the protection of a worker.

## 5.3. Workers


- All workers shall cooperate with the committee members while they perform their JHSC duties.
- All workers shall comply with this standard, procedures, and legislative requirements.
- Report all accidents, injuries, first aid and near-misses immediately to the supervisor.
- Advise other workers of unsafe conditions or work practices.
- Participate in solving health and safety problems.
- Provide recommendations to the supervisor to improve health and safety.
- No person shall knowingly, hinder or interfere with a committee or a committee member or provide false information.

## 5.4. Joint Health and Safety Committee (JHSC)

- All JHSC members shall perform duties as legislated. All JHSC members shall comply with these standards, procedures, and legislative requirements.

# 6 Related Documents/Forms

- BESTCO-PRO-01.2-Document and Record Control Procedure.

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- BESTCO-PRO-10.0 - Investigations and Reporting Procedure.
- BESTCO-PRO-13.1 - Joint Health and Safety Committee Procedure.
- BESTCO-PRO-13.3 - Workplace Violence and Harassment Procedure.
- JHSC Management Recommendation Form
- JHSC Meeting Agenda Form
- JHSC Meetings Minutes
- Monthly Inspection Form
- MLITSD Orders
- Safety Data Sheets
- Job Hazard Analysis or any hazard assessment
- Hygiene testing results, if applicable

## 7 Document and Record Maintenance


Documents and Records are maintained as per **BESTCO-PRO-01.2-Document and Record Control Procedure**.

## 8 Record Retention

Records are to be retained for a minimum of 3 years. Records will remain legible and readily identifiable.


## 9 Legislated/Other References

- Duties of employers – Occupational Health and Safety Act, s. 25, 26
- Duties of constructors – Occupational Health and Safety Act, s. 23
- Duties of supervisors – Occupational Health and Safety Act, s. 27
- Duties of workers– Occupational Health and Safety Act, s. 28
- Health and Safety Representative– Occupational Health and Safety Act, s. 8
- Joint Health and Safety Committee– Occupational Health and Safety Act, s. 9
- Joint Health and Safety Committee Involvement - Occupational Health and Safety Act, s. 11,12, 32, 33, 39, 41, 42, 43, 47, 51-55, 57, 59, 62, 65, 66

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# Health and Safety Representative Procedure

<b>Version No.</b>	<b>Reason for Revision:</b>	<b>Developed By and Date:</b>	<b>Reviewed By and Date:</b>	<b>Approved By and Date:</b>
1	To meet COR 2020 Standards, company's health and safety processes and Ontario's Health and Safety Legislative Requirements.	Emma Lisson, Health and Safety Coordinator 11 July, 2025	Michael Zaborsky and Ovidiu Cotiga, Senior Management 18 August, 2025	Michael Zaborsky, President 02 September, 2025

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## 1 Purpose

To outline the requirements and responsibilities with regards to the health and safety representative.

## 2 Scope

This procedure applies to all workplaces under the control of Bestco Construction Ltd., where 6-19 workers are regularly employed.

## 3 Definitions

**Compliance:** Meeting all requirements outlined within applicable legislation and regulations. [Ref. COR 2020 Audit Handbook].

**Constructor:** A person who undertakes a project for an owner and includes an owner who undertakes all or part of a project by himself or by more than one employer. [Ref. OHSA].

**Corrective Action:** Action to eliminate the cause of a non-conformity and to prevent recurrence. There can be more than one cause for a non-conformity. Document: Medium containing information related to the OHSMS. [Ref. COR 2020 Audit Handbook].


**Critically Injured:** means an injury of a serious nature that,

- places life in jeopardy,
- produces unconsciousness,
- results in substantial loss of blood,
- involves the fracture of a leg or arm but not a finger or toe,
- involves the amputation of a leg, arm, hand or foot but not a finger or toe,
- consists of burns to a major portion of the body, or
- causes the loss of sight in an eye;

[Ref O. Reg 420/21: Notices and Reports under Section 51 to 53.1 of the Act – Fatalities, critical injuries, occupational illnesses and other incidents under the OHSA].

**Document:** Medium containing information related to the OHSMS. [Ref. COR 2020 Audit Handbook].

**Employer:** A person who employs one or more workers or contracts for the services of one or more workers and includes a contractor or subcontractor who performs work or supplies services and a contractor or subcontractor who undertakes with an owner, constructor, contractor, or subcontractor to perform work or supply services [Ref. OHSA].

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**Hazard:** Source, situation, or act with a potential for harm in terms of human injury. [Ref. COR 2020 Audit Handbook].

**Health and Safety Representative:** A worker that brings awareness to safety concerns and facilitates communication between the constructor, supervisor, and the workers regarding safety. In workplaces, including construction projects, at which the number of workers regularly exceeds five and at which no joint health and safety committee is required. [Ref. OHSA].

**Incident:** Work related event(s) in which an injury, fatality or occupational illness occurred; and includes event(s) where no injury or illness occurred, such as a near hit or property damage. [Ref. COR 2020 Audit Handbook].

**Interested Parties:** Persons or groups, inside or outside the workplace, concerned with or affected by OHS performance of an organization. [Ref. COR 2020 Audit Handbook].

**Joint Health and Safety Committee (JHSC):** An advisory body composed of worker and management representatives that are committed to improving health and safety conditions in the workplace. A joint health and safety committee is required at workplace,

- at which twenty or more workers are regularly employed;
- with respect to which an order to an employer is in effect;
- other than a construction project where fewer than twenty workers are regularly employed, with respect to which a regulation concerning designated substances applies.


This requirement does not apply to a constructor at a project at which work is expected to last less than three months [Ref. OHSA].

**Legal Requirements:** All applicable legislation, including but not limited to the Occupational Health and Safety Act and its regulations [Ref. COR 2020 Audit Handbook].

**Management:** People who have care and control over people and/or processes [Ref. COR 2020 Audit Handbook].

- Middle Management (Project Manager, Office Manager, etc.):** A group of managers who administers and/or supervises the affairs of a department or division at the level below senior management of the company or organization.

**Non-conformity:** Non-fulfillment of a requirement [Ref. COR 2020 Audit Handbook].

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**Organization:** Company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public, or private, that has its own functions, management, and administration. [Ref. COR 2020 Audit Handbook].

**Other Requirements:** Requirements or provisions the organization subscribes, however are not legally binding, such as industry standards. [Ref. COR 2020 Audit Handbook].

**Owner:** Includes a trustee, receiver, mortgagee in possession, tenant, lessee, or occupier of any lands or premises used or to be used as a workplace, and a person who acts for or on behalf of an owner as an agent or delegate. [Ref. OHSA].

**Participation:** Involvement of workers, or worker representatives, in decision-making process(es) regarding the OHSMS. [Ref. COR 2020 Audit Handbook].

**Plan:** Detailed method for doing or achieving something. [Ref. COR 2020 Audit Handbook].

**Policy:** A policy is a general commitment, direction or intention and is formally stated by top management. A quality policy statement should express top management's commitment to the implementation and improvement of its management system. [Ref. COR 2020 Audit Handbook].

**Preventative Action:** Action to eliminate the cause of potential non-conformity or other potential undesirable potential situation. There can be more than one cause for a potential nonconformity. (For the purposes of this Standard, this refers to any action taken to fix a potential OHS problem.) [Ref. COR 2020 Audit Handbook].


**Procedure:** A documented, specified method to carry out an activity. **Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].

**Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].

**Project:** a construction project, whether public or private, including,

- the construction of a building, bridge, structure, industrial establishment, mining plant, shaft, tunnel, caisson, trench, excavation, highway, railway, street, runway, parking lot, cofferdam, conduit, sewer, watermain, service connection, telegraph, telephone or electrical cable, pipe line, duct or well, or any combination thereof,
- the moving of a building or structure, and



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- c) any work or undertaking, or any lands or appurtenances used in connection with construction.

[Ref. OHSA].

**Record:** Document stating results achieved or providing evidence of activities performed. [Ref. COR 2020 Audit Handbook].

**Senior Management (Company President, Vice President of Operations):** Person(s) at the highest level of an organization's structure responsible for leading, managing and /or directing an organization's day-to-day activities and/or operations. [Ref. COR 2020 Audit Handbook].

**Subcontractor:** A person or organization that takes a portion of a contract from the principal contractor or from another subcontractor.


**Supervisor:** A person who has charge of a workplace or authority over a worker [Ref. OHSA].

**Trade Union:** means a trade union as defined in the Labour Relations Act, 1995 that has the status of exclusive bargaining agent under that Act in respect of any bargaining unit or units in a workplace and includes an organization representing workers or persons to whom this Act applies where such organization has exclusive bargaining rights under any other Act in respect of such workers or persons [Ref. OHSA].

**Worker:** Any of the following, but does not include an inmate of a correctional institution or like institution or facility who participates inside the institution or facility in a work project or rehabilitation program:

- A person who performs work or supplies services for monetary compensation.
- A secondary school student who performs work or supplies services for no monetary compensation under a work experience program authorized by the school board that operates the school in which the student is enrolled.
- A person who performs work or supplies services for no monetary compensation under a program approved by a college of applied arts and technology, university, private career college or other post-secondary institution.
- Such other persons as may be prescribed who perform work or supply services to an employer for no monetary compensation.

[Ref. OHSA].

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**Workplace:** any land, premises, location or thing at, upon, in or near which a worker works. [Ref. OHSA].

**Workplace Harassment:** means,

- a) 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
- b) workplace sexual harassment

[Ref. OHSA].

**Workplace Parties:** Includes, but is not limited to, the employer, supervisor(s), workers, constructor, visitors, and owner. [Ref. COR 2020 Audit Handbook].

**Workplace Sexual Harassment:** means,

- a) 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, or
- b) 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

[Ref. OHSA].


**Workplace Violence:** means,

- 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 the worker,
- c) a statement or behaviour that it 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

[Ref. OHSA].

## 4 Procedure

At a project or other workplace where no committee is required and where the number of workers regularly exceeds five, Bestco Construction Ltd. shall cause the workers to select at least one health and safety representative from among the workers at the workplace who do not exercise managerial functions.


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A health and safety representative is required at any location with 6-19 employees. The health and safety representative must be a worker selected by the workers or trade union (s).

#### 4.1. Role of Health and Safety Representative

In accordance with the Occupational Health and Safety Act, a health and safety representative is to:

- conduct monthly workplace inspections.
- receive and review all incident, inspection and health and safety audit reports and to make recommendations as necessary.
- receive and review all health and safety-related test results and to make recommendations as necessary.
- accompany Safety Association representatives or Ministry of Labour, Immigration, Training and Skills Development (MLITSD) Health and Safety Inspectors as required.
- Participate in investigating incidents, injuries or occupational illnesses as required.
- obtain information from the employer regarding potential or actual workplace hazards.
- obtain information from the employer regarding statistics, trends, records, processes or any other information that may help it to fulfill its mandate.
- assist in hazard assessment of new or modified facilities, processes, procedures, equipment, devices and materials.
- encourage adequate education and training programs in order that all employees are knowledgeable in their rights, restrictions, responsibilities, and duties under the Occupational Health and Safety Act.
- evaluate all newly introduced potential hazards (i.e. machinery and/or chemicals) and communicate the hazard potentials to respective Management, prior to their use.
- develop and implement with Management, training programs for all newly introduced hazards and participate in the development and delivery of health and safety training programs.
- be present during occupational hygiene testing if required at the workplace.
- advise the selection of the personal protective equipment.
- address matters related to Designated Substances Regulations and WHMIS, where applicable.
- address any workplace harassment incident, if it is brought to the individual.
- carry out any other duties and functions as prescribed by the legislation.

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#### 4.2. Workplace Inspection

A health and representative will inspect the workplace once a month **using Monthly Inspection Form**. A management member may take part of the inspection based on the schedule.

#### 4.3. Required Training

The following training will be provided to a health and safety representative:

- Accident Investigation
- Workplace Inspection
- Emergency Response

#### 4.4. Confidentiality of Information

Health and safety representatives are to keep confidential any personal medical details or other sensitive information they receive.

#### 4.5. Responding to Unsafe Conditions or Practices

One of the most important legislated functions is to develop recommendations to control hazards or address safety concerns at the workplace. Representatives shall participate in investigation and act upon dangerous circumstances that require immediate attention. Representatives may identify hazards during monthly inspections, incident investigations or through daily worker contacts. However, because representative are workers under the legislation, they first have a legal duty to report any hazards or contravention they become aware of to their supervisor.


#### 4.6. Notice of Incident and Accident Investigation

Where there is a fatality or critical injury, the health and safety representative will be notified immediately of the occurrence by telephone or other direct means.

All other incidents inclusive of occupational illness will also be informed to as appropriately (Refer to Accident Reporting and Investigations Procedure).

In the event of a fatality or critical injury, the health and safety representative inspect the workplace. The health and safety representative shall participate in the investigation along with management (Refer to the First Aid, Incident, Accident Reporting and Investigation Procedure for further details)

#### 4.7. Accompaniment

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The health and safety representative shall accompany a MLITSD inspector while carrying out a Ministry inspection of the workplace.

#### **4.8. Work Refusals**

The health and safety representative must be present during the employer or supervisor's investigation of a work refusal.

#### **4.9. Formal Written Recommendations**

Senior Management who receives written recommendations from a health and safety representative shall respond in writing within twenty-one days.

#### **4.10. Consultation on industrial hygiene testing**

The health and safety representative will be consulted with respect to proposed testing strategies for investigating industrial hygiene at the workplace. Senior Management will provide information to health and safety representative concerning testing strategies to be used to investigate industrial hygiene at the workplace. Health and safety representatives are entitled to be present at the beginning of testing conducted with respect to industrial hygiene at the workplace if the member believes his or her presence is required to ensure that valid testing procedures are used or to ensure that the test results are valid.


#### **4.11. Access to annual summary**

Upon request, information an annual summary of data relating to the company in respect of the number of work accident fatalities, the number of lost work-day cases, the number of lost workdays, the number of non-fatal cases that required medical aid without lost work days, the incidence of occupational illnesses, the number of occupational injuries, and such other data will be provided by Workplace Safety and Insurance Board (WSIB).

#### **4.12. Workplace Violence and Harassment Program**

Senior Management shall advise the health and safety representative of the results of violence risk assessment and provide a copy if the assessment is in writing.

Senior Management shall, in consultation with the health and safety representative develop and maintain a written program to implement the workplace harassment policy.

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#### 4.13. Order of Director

When there is a biological, chemical or physical agent or combination of such agents is used or intended to be used in the workplace and its presence in the workplace or the manner of its use is in the opinion of a Director likely to endanger the health of a worker, the Director shall by notice in writing to the employer. A copy of the order shall be provided to health and safety representative.

#### 4.14. Information of hazardous material

A copy of every current safety data sheet in respect of hazardous materials must be provided to the health and safety representative. An employer shall consult with the health and safety representative, if any, on making safety data sheets available in the workplace or furnishing them as required.

Copy of any assessment related biological and/or chemical agents must be provided to health and safety representative.

If hazardous physical agent is produced in the workplace, the information must be provided to the health and safety representative. The instruction and training shall be developed, implemented and reviewed in consultation with the health and safety representative.

#### 4.15. Payment


All time spent in activities relating to the function of the health and safety representative will be paid for at the current rate of pay for performing work, and the time spent shall be considered as time at work.

#### 4.16. General

- a) All workers will be encouraged to discuss their problems with their supervisor before bringing it to the attention of health and safety representative.
- b) Medical or trade secret information will be kept confidential by health and safety representative

## 5 Roles and Responsibilities

Responsibilities and accountabilities of workplace parties ensures a commitment by workplace parties ensuring a safe and healthy work environment. The workplace parties have been outlined in defined as per the Organization Chart. Responsibilities are listed below with the specific roles within the organization.

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### 5.1. Senior Management

- Providing assistance and co-operation where necessary to the health and safety representative to carry out its role.
- Respond to written recommendations to the health and safety representative within 21 days. The response must include corrective action time and dates, or reasons for disagreement of recommendations.
- Provide required health and safety information of the workplace.

### 5.2. Supervisors

- Set an example by being consistently safety conscious and insisting on the safe performance of work.
- Observe the work in progress and provide positive input to the workers.
- Involve in ongoing hazard assessment.
- Participate in the development and review of safe work practices and procedures.
- Take every precaution reasonable in the circumstances for the protection of a worker.


### 5.3. Workers

- All workers shall cooperate with the health and safety representative while they perform their JHSC duties.
- All workers shall comply with this standard, procedures and legislative requirements.
- Report all accidents, injuries, first aid and near-misses immediately to the supervisor.
- Advise other workers of unsafe conditions or work practices.
- Participate in solving health and safety problems.
- Provide recommendations to the supervisor to improve health and safety.
- No person shall know, hinder or interfere with a health and safety representative or provide false information.

### 5.4. Health and Safety Representative

- All health and safety representatives shall perform duties as legislated. All health and safety representatives shall comply with these standards, procedures and legislative requirements.



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## 6 Related Documents/Forms

- BESTCO-PRO-01.2-Document and Record Control Procedure.
- BESTCO-PRO-10.0-Investigations and Reporting Procedure.
- BESTCO-PRO-13.1-Joint Health and Safety Committee Procedure.
- BESTCO-PRO-13.3-Workplace Violence and Harassment Procedure.
- Monthly Inspection Form
- MLITSD Orders
- Safety Data Sheets
- Job Hazard Analysis or any hazard assessment
- Hygiene testing

## 7 Document and Record Maintenance

Documents and Records are maintained as per **BESTCO-PRO-01.2-Document and Record Control Procedure**.


## 8 Record Retention

Records are to be retained for a minimum of 3 years. Records will remain legible and readily identifiable.

## 9 Legislated/Other References

- Duties of employers – Occupational Health and Safety Act, s. 25, 26
- Duties of constructors – Occupational Health and Safety Act, s. 23
- Duties of supervisors – Occupational Health and Safety Act, s. 27
- Duties of workers– Occupational Health and Safety Act, s. 28
- Health and Safety Representative– Occupational Health and Safety Act, s. 8
- Health and Safety Representative Involvement - Occupational Health and Safety Act, s. 11,12, 32, 33, 39, 41, 42, 43, 47, 51-55, 57, 59, 62, 65, 66



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## Workplace Violence and Harassment Policy

Bestco Construction Ltd. is committed to the prevention of workplace violence and harassment and will take every necessary precaution to protect all workers, subcontractors and the public from workplace violence and harassment from all sources. Senior management of Bestco Construction Ltd. recognizes the rights of workers to work in an environment free of violence and harassment.

Behaviour associated with workplace violence and harassment will not be tolerated at Bestco Construction Ltd. As the employer, Bestco Construction Ltd. will ensure that this policy and supporting program are implemented and maintained and that all employees have the appropriate information and instruction to protect them from violence and harassment in the workplace.


Employees will be trained on recognizing and reporting violence and harassment in the workplace. All employees, subcontractors and visitors are responsible for raising any concerns relating to workplace violence and harassment to management without fear of retaliation or penalty. Reported incidents of workplace violence and harassment will be taken seriously and information regarding any harassment complaint or incident will not be disclosed except to the extent necessary to protect workers, to investigate and to take corrective action or as otherwise required by law. Employees will be made aware on the importance of maintaining respect in the workplace at all times.

Management and supervisors are responsible for ensuring that this policy and related procedure are being followed by employees and for ensuring that they understand that workplace violence and/or harassment is unacceptable from anyone in any form.

Employees may seek help to address workplace harassment from various sources such as the Joint Health and Safety Committee (JHSC) (if applicable) or the health and safety representative.

Senior Management is committed to providing the necessary budget, time, and resource for establishing and maintaining the program. All workplace violence and harassment incidents shall be addressed in a fair and timely manner, respecting the privacy of all concerned.

Management will address workplace violence and harassment from all sources such as customers, clients, visitors, subcontractors, supervisors, workers, and members of the public. The policy shall be reviewed annually for sustainability, adequacy, and effectiveness.

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Name: Michael Zaborsky

Title: President

Company: Bestco Construction (2005) Ltd.


Sept. 2, 2025

Date: 02 September, 2025

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# Workplace Violence and Harassment Procedure

<b>Version No.</b>	<b>Reason for Revision:</b>	<b>Developed By and Date:</b>	<b>Reviewed By and Date:</b>	<b>Approved By and Date:</b>
1	To meet COR 2020 Standards, company's health and safety processes and Ontario's Health and Safety Legislative Requirements.	Emma Lisson, Health and Safety Coordinator 11 July, 2025	Michael Zaborsky and Ovidiu Cotiga, Senior Management 18 August, 2025	Michael Zaborsky, President 02 September, 2025

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## 1 Purpose

Bestco Construction Ltd. will not tolerate workplace violence and harassment as defined under the Ontario Occupational Health and Safety Act. Workplace violence may occur between co-workers, contractors, subcontractors, suppliers, and etc. In addition, any harassment or discrimination incidents that escalate into workplace violence will not be tolerated. Any employee who engages in violence or harassment is subject to discipline up to and including termination of employment. The purpose of this procedure is to identify steps to follow in the event of an incident involving workplace violence and harassment.

## 2 Scope

The procedure applies to Bestco Construction Ltd. employees. This procedure has been developed in accordance with the Ontario Occupational Health & Safety Act - Bill 168 and Bill 132. The policy will be reviewed annually in accordance with applicable legislation.

## 3 Definitions

**Compliance:** Meeting all requirements outlined within applicable legislation and regulations. [Ref. COR 2020 Audit Handbook].

**Conformity:** Fulfillment of a requirement. [Ref. COR 2020 Audit Handbook].


**Critically Injured:** means an injury of a serious nature that,

- places life in jeopardy,
- produces unconsciousness,
- results in substantial loss of blood,
- involves the fracture of a leg or arm but not a finger or toe,
- involves the amputation of a leg, arm, hand, or foot but not a finger or toe,
- consists of burns to a major portion of the body, or
- causes the loss of sight in an eye;

[Ref O. Reg 420/21: Notices and Reports under Section 51 to 53.1 of the Act – Fatalities, critical injuries, occupational illnesses, and other incidents under the OHSA].

**Document:** Medium containing information related to the OHSMS. [Ref. COR 2020 Audit Handbook].

**Employer:** A person who employs one or more workers or contracts for the services of one or more workers and includes a contractor or subcontractor who performs work or

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supplies services and a contractor or subcontractor who undertakes with an owner, constructor, contractor, or subcontractor to perform work or supply services [Ref. OHSA].

**Hazard:** Source, situation, or act with a potential for harm in terms of human injury. [Ref. COR 2020 Audit Handbook].

**Health and Safety Representative:** A worker that brings awareness to safety concerns and facilitates communication between the constructor, supervisor, and the workers regarding safety.

- At a project or other workplace where no committee is required and where the number of workers regularly exceeds five, the constructor or employer shall cause the workers to select at least one health and safety representative from among the workers at the workplace who do not exercise managerial functions.

[Ref. OHSA].

**Incident:** Work related event(s) in which an injury, fatality or occupational illness occurred; and includes event(s) where no injury or illness occurred, such as a near hit or property damage. [Ref. COR 2020 Audit Handbook].

**Interested Parties:** Persons or groups, inside or outside the workplace, concerned with or affected by OHS performance of an organization. [Ref. COR 2020 Audit Handbook].


**Joint Health and Safety Committee (JHSC):** An advisory body composed of worker and management representatives that are committed to improving health and safety conditions in the workplace. A joint health and safety committee is required at workplace,

- at which twenty or more workers are regularly employed;
- with respect to which an order to an employer is in effect;
- other than a construction project where fewer than twenty workers are regularly employed, with respect to which a regulation concerning designated substances applies.

This requirement does not apply to a constructor at a project at which work is expected to last less than three months [Ref. OHSA].

**Legal Requirements:** All applicable legislation, including but not limited to the Occupational Health and Safety Act and its regulations [Ref. COR 2020 Audit Handbook].

**Management:** People who have care and control over people and/or processes [Ref. COR 2020 Audit Handbook].

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- **Middle Management (Project Manager, Office Manager, etc.):** A group of managers who administers and/or supervises the affairs of a department or division at the level below senior management of the company or organization.

**Non-conformity:** Non-fulfillment of a requirement [Ref. COR 2020 Audit Handbook].

**Occupational Health and Safety (OHS):** Conditions and factors that affect or could affect the health and safety of employees or other workers, inclusive of temporary workers and contractor personnel, visitors, suppliers, vendors, or any other person in the workplace. [Ref. COR 2020 Audit Handbook].

**Occupational Health and Safety Management System (OHSMS):** As defined in the OHSA “means a coordinated system of procedures, processes and other measures that is designed to be implemented by employers in order to promote continuous improvement in occupational health and safety. [Ref. COR 2020 Audit Handbook]

**Organization:** Company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public, or private, that has its own functions, management, and administration. [Ref. COR 2020 Audit Handbook].


**Other Requirements:** Requirements or provisions the organization subscribes, however are not legally binding, such as industry standards. [Ref. COR 2020 Audit Handbook].

**Participation:** Involvement of workers, or worker representatives, in decision-making process(es) regarding the OHSMS. [Ref. COR 2020 Audit Handbook].

**Plan:** Detailed method for doing or achieving something. [Ref. COR 2020 Audit Handbook].

**Policy:** A policy is a general commitment, direction or intention and is formally stated by top management. A quality policy statement should express top management's commitment to the implementation and improvement of its management system. [Ref. COR 2020 Audit Handbook].

**Procedure:** A documented, specified method to carry out an activity. **Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].

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**Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].

**Project:** a construction project, whether public or private, including,

- a) the construction of a building, bridge, structure, industrial establishment, mining plant, shaft, tunnel, caisson, trench, excavation, highway, railway, street, runway, parking lot, cofferdam, conduit, sewer, watermain, service connection, telegraph, telephone or electrical cable, pipe line, duct or well, or any combination thereof,
- b) the moving of a building or structure, and
- c) any work or undertaking, or any lands or appurtenances used in connection with construction.

[Ref. OHSА].

**Record:** Document stating results achieved or providing evidence of activities performed. [Ref. COR 2020 Audit Handbook].

**Residual Risk:** Combination of the likelihood of the occurrence after the hierarchy of controls has been implemented for an identified hazard [Ref. COR 2020 Audit Handbook].

**Risk:** Combination of the likelihood of an occurrence of a hazardous event or exposure(s) and the severity of injury or occupation illness that can be caused by the event or exposure(s) [Ref. COR 2020 Audit Handbook].


**Risk Assessment:** Process of evaluating the risk(s) arising from a hazard(s), taking into account the adequacy of any existing controls, and deciding whether or not the risk(s) is acceptable [Ref. COR 2020 Audit Handbook].

**Senior Management (Company President, Vice President of Operations) - Employer's Representative:** Person(s) at the highest level of an organization's structure responsible for leading, managing and /or directing an organization's day-to-day activities and/or operations. [Ref. COR 2020 Audit Handbook].

**Supervisor:** A person who has charge of a workplace or authority over a worker [Ref. OHSА].

**Supplier:** A person who supplies any machine, device, tool, or equipment under any rental, leasing, or similar arrangement for use in or about a workplace. [Ref. OHSА].



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**Trade Union:** means a trade union as defined in the Labour Relations Act, 1995 that has the status of exclusive bargaining agent under that Act in respect of any bargaining unit or units in a workplace and includes an organization representing workers or persons to whom this Act applies where such organization has exclusive bargaining rights under any other Act in respect of such workers or persons [Ref. OHSA].

**Worker:** Any of the following, but does not include an inmate of a correctional institution or like institution or facility who participates inside the institution or facility in a work project or rehabilitation program:

- a) A person who performs work or supplies services for monetary compensation.
- b) A secondary school student who performs work or supplies services for no monetary compensation under a work experience program authorized by the school board that operates the school in which the student is enrolled.
- c) A person who performs work or supplies services for no monetary compensation under a program approved by a college of applied arts and technology, university, private career college or other post-secondary institution.
- e) Such other persons as may be prescribed who perform work or supply services to an employer for no monetary compensation.

[Ref. OHSA].

**Workplace:** any land, premises, location, or thing at, upon, in or near which a worker works. [Ref. OHSA].

**Workplace Harassment:** means,


- a) 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
- b) workplace sexual harassment

[Ref. OHSA].

**Workplace Parties:** Includes, but is not limited to, the employer, supervisor(s), workers, constructor, visitors, and owner. [Ref. COR 2020 Audit Handbook].

**Workplace Sexual Harassment:** means,

- a) 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, or
- b) 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

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worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome  
[Ref. OHSA].

**Workplace Violence:** means,

- 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 the worker,
- a statement or behaviour that it 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

[Ref. OHSA].

## 4 Procedure

### 4.1. Workplace Violence and Harassment Policy and Program

The up-to-date workplace violence and harassment policy should be posted on all health and safety boards. All employees must review the policy as part of their orientation. Senior management in consultation with the Joint Health and Safety Committee (JHSC) (if applicable) will review the policy at least annually or as often as necessary and update all employees on the amendments as soon as possible.


### 4.2. Workplace Violence Risk Assessment

An employer shall assess the risks of workplace violence that may arise from the nature of the workplace, the type of work or the conditions of work. Management and supervisors are required to periodically assess the risk of violence in each workplace.

Assessments and reassessments must be documented, using the **Workplace Violence Risk Assessment Tool**, and must identify the potential risks of violence in the workplace.

The assessment requires an evaluation of the following:

- General physical environment.
- Specific risks associated with the type of work or conditions of work.
- Controls associated with the specific risks.

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For project sites, an assessment will be conducted once per job. For corporate office, an assessment will be conducted at the beginning, and a re-assessment will follow every three years.


A reassessment should be done periodically as often as necessary. Reasonable controls must be implemented to eliminate or mitigate the risks identified in the assessment. A copy of the results of the assessment must be given to the JHSC or health and safety representative or on request of the workers if the assessment is in writing.

#### **4.3. Handling Workplace Violence: Summoning Immediate Assistance**

If a violent situation is determined an immediate threat, the emergency response plan for the workplace must be followed:

1. Employees who are at an immediate risk of workplace violence should promptly leave and seek out a safe place.
2. Employees who are in a situation or have witnessed a situation where workplace violence is likely to occur should immediately contact the Manager/ Project Supervisor by cell phone (phone number is posted in the safety board) or by direct contact, sound the site air horn or alarm system, or contact the police by dialing 911.
3. When making the emergency service call:
  - a) Remain calm.
  - b) Let the operator control the conversation. They have standard questions for obtaining critical information from you in a timely and orderly manner.
  - c) Clearly state your location and the location of the situation you are reporting using the street address if you know it.
  - d) State briefly and clearly what you have observed or why you are calling.
  - e) If possible, without exposing yourself to danger, stay on the line until emergency services arrive, unless the operator specifically asks you to hang up.
4. Taking into consideration the circumstances, secure the location or evacuate the premises on the advice of the supervisor when safe to do so.
5. Wherever possible, it is important to let the harasser or abuser know right away that his or her behavior is unacceptable and that it must stop immediately.

#### **4.4. Handling Workplace Violence: Domestic Violence**

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Domestic violence is defined as violent, threatening or extremely coercive behavior perpetrated by one partner in a current or former relationship on the other. It can consist of a pattern of ongoing abuse, or a single isolated incident. Senior Management shall take every precaution reasonable in the circumstances for the protection of the worker and other employees. The following steps should be taken if workers are found to be exposed to domestic violence:

1. Report issues of domestic violence immediately to senior management. All information will be kept confidential to maintain the privacy of the individual being threatened with domestic violence.
2. If an employee has a legal court order (e.g., restraining order, or “no-contact” order) against another individual, the employee may be required to notify his or her supervisor, and to supply a copy of that order to senior management. This will likely be required in instances where the employee strongly feels that the aggressor may attempt to contact that employee at the company, in direct violation of the court order. Such information will be kept confidential.
3. Employers will apply controls to workplace violence according to the risk if applicable. Controls may include but are not limited to:
  - Limit number of entrances or exits
  - Installing public way
  - Provide workers with portable phones

#### **4.5. Handling Workplace Violence: Employee with a History of Violence**

Senior management’s duty is to provide workers with information, including personal information, related to a risk of workplace violence from a person with a history of violent behavior if:


- a) the worker can be expected to encounter that person in the course of his or her work; and
- b) the risk of workplace violence is likely to expose the worker to physical injury.

No employer or supervisor shall disclose more personal information in the circumstances than is reasonably necessary to protect the worker from physical injury.

#### **4.6. Handling Workplace Violence: Violence without Intent**

Violence in the workplace can occur without the intent of the person who is causing harm. Examples of this include:

- A person could become violent due to medical conditions.
- A person could become violent due to a disability such as Autism, mental health.

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- Two individuals who are not employees of the company could be fighting and injure an employee who tries to intervene.

If a supervisor becomes aware or ought reasonably to be aware that a worker is taking medication which could potentially cause a violent incident, they must immediately contact senior management to implement safety measures to protect the worker and/or their coworkers.

#### **4.7. Work Refusal**

An employee has the right to refuse work if he/she has reason to believe he/she is in danger from workplace violence. However, an employee can only refuse work if the alleged violent offender is at the workplace and has threatened to hurt the other worker. The protocol for the work refusal process can be found in the work refusal procedure.

#### **4.8. Reporting: Procedures for Incidents Involving Employees**


The following steps should be taken if an employee believes they are a victim of workplace violence or harassment:

1. Fill out the Workplace Violence and Harassment Reporting Form on the 4Safecom site.
2. Report to the incident to
  - a) Direct Supervisor for workplace violence and harassments incidents from workers
  - b) Senior management for workplace violence and harassments incidents from supervisor
  - c) JHSC or health and Safety Representative if workplace violence and harassments incidents from members of senior management

Acts of retaliation include (but are not limited to): interference, coercion, threats, physical restraint, workload reassignments, denial of promotion, or any other manner of retribution. Any acts of retaliation must be reported immediately to the President.

#### **4.9. Reporting: Procedures Incidents Involving Outsiders**

Should a worker be harassed or threatened by an individual outside of the workplace and have reason to believe this person may harm them in any way, the Employee is required to report concerns to his or her supervisor.

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If a visitor to any of the company's workplaces is seen with a weapon (or is known to possess one), makes a verbal threat or sexually assaults against an employee or another individual, employee witnesses are required to immediately contact the police, emergency response services and their supervisor.

Any complaint made in bad faith, if demonstrated as being such through convincing evidence, will result in disciplinary action being taken against the individual lodging the fraudulent or malicious complaint.


#### 4.10. Investigations

The following procedures must be followed when investigating incidents of workplace violence and harassment cases:

1. Supervisors (with the help of the JHSC or site H&S Representative, if required) must conduct an investigation using the Workplace Violence and Harassment Investigation Form.
2. Supervisor will interview and document the comments of any witness(es) and the alleged offender. Information will not be disclosed unless the disclosure is necessary for the purposes of investigating or taking corrective actions.
3. When there is an incident or complaint of workplace harassment need to be investigated by a third party outside the company, the Management will appoint a licensed private investigator, human resource professional, lawyer, or personnel who holds other professional designation based on the harassment complaint.
4. If a person is disabled from performing his/her usual work or requires medical attention because of incidence of workplace violence but is not critically injured and no fatalities occur, the employer will submit a written notice within 4 days occurrence to
  - a) The committee, the health and safety representative and trade union, if any
  - b) The director if the inspector requires notification of the director
5. The results of the investigation or any corrective actions taken will be communicated to the reported victim and alleged offender.

Any incidents, discussion or investigations will be kept confidential, except where disclosure is necessary for the purpose of investigation or where it may be required by law.

#### 4.11. Outcomes of Investigation: Offender

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Workers will be subject to the Bestco Construction Ltd.'s progressive disciplinary policy and procedure. Bestco Construction Ltd. reserves the right to combine or skip steps depending on the facts of each situation and nature of the offense. Disciplinary action taken will be consistent with the seriousness of the infraction. Some of the factors that will be considered are whether the offense is repeated despite coaching, counseling, or training; the employee's work record; and the impact the conduct and performance issues have on the organization.

#### **4.12. Outcomes of Investigation: Victim of Workplace Violence and Harassment**

Workers injured from incident will follow the guidelines outlined in Bestco Construction Ltd.'s Return to Work Program. Bestco Construction Ltd. is committed to cooperating with all of their employees who have been injured on the job site and will do everything they can for an early and safe return to work.

As per the Occupational Health and Safety Act s. 52, If a person is disabled from performing his or her usual work or requires medical attention because of workplace violence at a workplace, but no person dies or is critically injured because of that occurrence, the employer shall, within four days of the occurrence, give written notice of the occurrence containing the prescribed information and particulars to the following:

1. The committee, the health and safety representative and the trade union, if any.
2. The Director if an inspector requires notification of the Director


## **5 Roles and Responsibilities**

### **5.1. Senior Management**

- Take all precautions necessary to provide a safe work environment for all employees that is free of violence, threats of violence, harassment, assault, and intimidation.
- All complaints will be addressed, and disciplinary measures will be taken when a report has been substantiated, regardless of the position of the offender.
- Any incidents or discussion will be kept confidential, except where disclosure is necessary for the purpose of investigation or punitive action, or where it may be required by law.

### **5.2. Supervisors**



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- Investigate reported alleged incidents of workplace violence or harassment.
- Implement corrective actions as required.

### 5.3. Workers

- Treat their fellow employees with proper consideration and respect.
- Report all incidents of workplace violence and harassment to their supervisor or senior management or H&S Representative.
- Address the harasser to let him/her know that the comment was not acceptable.
- Inform supervisor if harassment does not stop

### 5.4. Investigator

- The investigator must ensure the investigation is kept confidential and identifying information is not disclosed unless necessary to conduct the investigation or as required by law.
- The investigator must remind the worker who allegedly experienced workplace harassment, the alleged harasser(s), and any witnesses of any confidentiality requirements under the company workplace harassment program.
- The investigator must thoroughly interview both the worker who has allegedly experienced workplace harassment and the alleged harasser(s) if the alleged harasser(s) is a worker. If the alleged harasser is not a worker of the company, the investigator must make reasonable efforts to interview the alleged harasser if the alleged harasser is known to the company.
- The investigator must collect and review any relevant documents.


### 5.5. Alleged Offender

- Respond to allegations against them.
- Cooperate in the investigation process.
- Review policies and procedures.

### 5.6. Joint Health and Safety Committee/ Health and Safety Representative (if applicable)

- Treat workplace violence and harassment incidents the same as any other workplace hazard.
- Participate in the investigation if required.



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## 6 Related Documents/Forms

- BESTCO-PRO-01.2 – Document and Record Control Procedure.
- BESTCO-PRO-10.0 – Investigations and Reporting Procedure.
- BESTCO-PLY-13.2 – Workplace Violence and Harassment Policy.
- Workplace Violence Risk Assessment
- Workplace Violence and Harassment Reporting Form

## 7 Document and Record Maintenance


Documents and Records are maintained as per **BESTCO-PRO-01.2-Document and Record Control Procedure**.

## 8 Record Retention

Records are to be retained for a minimum of 3 years. Records will remain legible and readily identifiable.



## 9 Legislated/Other References

- Violence and Harassment, Occupation Health and Safety Act, Part III.0.1 s. 32.0.1 –32.0.8
- Duties of employers – Occupational Health and Safety Act, s. 25, 26
- Duties of supervisors – Occupational Health and Safety Act, s. 27
- Duties of workers– Occupational Health and Safety Act, s. 28
- Health and Safety Representative– Occupational Health and Safety Act, s. 8
- Joint Health and Safety Committee– Occupational Health and Safety Act, s. 9

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## Return To Work Procedure

<b>Version No.</b>	<b>Reason for Revision:</b>	<b>Developed By and Date:</b>	<b>Reviewed By and Date:</b>	<b>Approved By and Date:</b>
1	To meet COR 2020 Standards, company's health and safety processes and Ontario's Health and Safety Legislative Requirements.	Emma Lisson, Health and Safety Coordinator 11 July, 2025	Michael Zaborsky and Ovidiu Cotiga, Senior Management 18 August, 2025	Michael Zaborsky, President 02 September, 2025

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## 1 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 Bestco Construction Ltd. The RTW program will provide every opportunity for injured workers to return to gainful employment in the event of a disabling workplace accident.

## 2 Scope

This procedure applies to employees who sustain a workplace injury or illness, and all employees involved in the Return to Work Program. It is the duty of senior management to follow this procedure.


## 3 Definitions

**Accommodation:** A change or modification to the job or workplace so that the work is within the injured or ill person's functional capabilities and the risk of injury is reduced.

Types of accommodation include:

- Reduce hours
- Graduate RTW hours
- Re-assign duties
- Restructure the job
- More frequent rest breaks
- Work platform vs. ladders
- Ladders for climbing scaffolds
- Mini stretch breaks (10-15 minutes)
- Chair with back support vs. Picnic table
- Anti-vibration tools (e.g., anti-vibration jackhammer)
- Make heavy tools available at waist height
- Light shop work, general clean-up
- Painting trailers, containers (light work with brush)
- Washing trucks
- Pickup or delivery of plans
- Training in their selected field, where possible
- Computer training in safety prevention, if available
- Increasing of awareness

**Document:** Medium containing information related to the OHSMS. [Ref. COR 2020 Audit Handbook].

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Approved By: Michael Zaborsky, President		Date: 02 Sept, 2025

**Employer:** A person who employs one or more workers or contracts for the services of one or more workers and includes a contractor or subcontractor who performs work or supplies services and a contractor or subcontractor who undertakes with an owner, constructor, contractor, or subcontractor to perform work or supply services [Ref. OHSA].

**Incident:** Work related event(s) in which an injury, fatality or occupational illness occurred; and includes event(s) where no injury or illness occurred, such as a near hit or property damage. [Ref. COR 2020 Audit Handbook].

**Legal Requirements:** All applicable legislation, including but not limited to the Occupational Health and Safety Act and its regulations [Ref. COR 2020 Audit Handbook].

**Management:** People who have care and control over people and/or processes [Ref. COR 2020 Audit Handbook].

- **Middle Management (Project Manager, Office Manager, etc.):** A group of managers who administers and/or supervises the affairs of a department or division at the level below senior management of the company or organization.


**Occupational Health and Safety (OHS):** Conditions and factors that affect or could affect the health and safety of employees or other workers, inclusive of temporary workers and contractor personnel, visitors, suppliers, vendors, or any other person in the workplace. [Ref. COR 2020 Audit Handbook].

**Occupational Health and Safety Management System (OHSMS):** As defined in the OHSA “means a coordinated system of procedures, processes and other measures that is designed to be implemented by employers in order to promote continuous improvement in occupational health and safety. [Ref. COR 2020 Audit Handbook]

**Organization:** Company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public, or private, that has its own functions, management, and administration. [Ref. COR 2020 Audit Handbook].

**Other Requirements:** Requirements or provisions the organization subscribes, however are not legally binding, such as industry standards. [Ref. COR 2020 Audit Handbook].

**Policy:** A policy is a general commitment, direction or intention and is formally stated by top management. A quality policy statement should express top management's commitment to the implementation and improvement of its management system. [Ref. COR 2020 Audit Handbook].

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**Procedure:** A documented, specified method to carry out an activity. Process: A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].

**Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].

**Record:** Document stating results achieved or providing evidence of activities performed. [Ref. COR 2020 Audit Handbook].

**Senior Management (Company President, Vice President of Operations) -**

**Employer's Representative:** Person(s) at the highest level of an organization's structure responsible for leading, managing and /or directing an organization's day-to-day activities and/or operations. [Ref. COR 2020 Audit Handbook].

**Supervisor:** A person who has charge of a workplace or authority over a worker [Ref. OHSA].

**Worker:** Any of the following, but does not include an inmate of a correctional institution or like institution or facility who participates inside the institution or facility in a work project or rehabilitation program:


- A person who performs work or supplies services for monetary compensation.
- A secondary school student who performs work or supplies services for no monetary compensation under a work experience program authorized by the school board that operates the school in which the student is enrolled.
- A person who performs work or supplies services for no monetary compensation under a program approved by a college of applied arts and technology, university, private career college or other post-secondary institution.
- Such other persons as may be prescribed who perform work or supply services to an employer for no monetary compensation.

[Ref. OHSA].

**Workplace:** any land, premises, location, or thing at, upon, in or near which a worker works. [Ref. OHSA].

**Workplace Harassment:** means,

- 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
- workplace sexual harassment

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[Ref. OHSA].

## 4 Procedure

### 4.1. Injured Worker

Workers will inform their supervisor immediately of any injuries sustained in the workplace and receive prompt first aid treatment and when required medical treatment by a healthcare professional. The worker must take to the physician an Injured Worker's Package consisting of: **Letter to Treating Practitioner** and the **Functional Abilities Form**.

The worker must provide to their supervisor a medical assessment from a licensed physician(s) outlining any restrictions resulting from the injury/illness before returning to work. All information provided will be kept confidential.

**Note:** A change in physician cannot be made without permission of WSIB.


### 4.2. Contact with the Injured Worker

If a worker is required to take time away from work, he/she must maintain regular contact with management regarding their condition. Bestco Construction Ltd. will maintain correspondence, using the Contact Log, in an effort to return an employee back to work as quickly and safely as possible.

### 4.3. Re-Integration Plan

It is the employer's duty to modify the work or workplace to accommodate to the needs of the injured worker. This may include providing accommodation. The following steps will be followed to re-integrate the worker:

1. The injured worker's supervisor/management will assess the most recent medical report(s) and provide suitable work that is consistent with the worker's functional abilities form. The injured worker and the employer will co-operate in developing a written return to work plan.
2. Depending on the severity of the injury, the worker's return to work plan will take into consideration the following forms:
  - a) **Functional Abilities Form**
  - b) Job Hazard Assessment for relevant tasks
3. Where workplace parties are unable to arrange a return to suitable and available work plan, a work transition assessment will be conducted by WSIB to determine what help a worker may need to return to work with [Title] or a new one.

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4. This will be done using the existing Physical Demands Matrix which was developed through the Job Hazard Analysis.
5. If work is modified, the injured worker will be provided with a Modified Job Description Form. The injured worker must sign the form as well. If management and the employee cannot agree on a workable solution, WSIB may be contacted, and a mediator brought in to assist towards a resolution.
6. After modified work is agreed upon, the worker may begin work. The injured worker will be observed for a while to ensure that the work being performed does not exceed the workers physical restrictions and that difficulties are not encountered.
7. The supervisor must maintain regular communication at least once a week, using the Contact Log, with the employee to monitor the progress and effectiveness of the re-integration.
8. The work return process will adapt as changes are to arise. Employer will accommodate worker according to the worker's physical restrictions determined by what has been written in the Physical Demands Form and advice provided by the physician in Functional Abilities Form.
9. The worker will only return to their normal job function once given written clearance by a physician.

Management will review the follow-up/progress reports at the end of each week, unless problems with the program occur during the week, at which time immediate intervention by the management team will take place.

#### **4.4. WSIB Reporting**

Management must report the following to WSIB:


- Any changes in wages as a result of the modified duty.
- Any changes in the duties or the duration of the program.
- The inability of the employee to comply or participate in the program.
- The completion of the program.

## **5 Roles and Responsibilities**

### **5.1. Senior Management**

- Contact injured worker ASAP and stay in regular contact. Cooperate in providing suitable work.
- Cooperate in providing suitable work and cooperate with the return-to-work process.
- Report the employee's injury/illness to WSIB by submitting form 7.



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- Provide WSIB with all the requested information regarding the injured/ill employee.
- Inform WSIB with information regarding potential disputes/disagreements between you and the injured/ill employee.
- Offer to re-employ the injured/ill employee and provide him/her with suitable work.
- Provide workers with Functional Abilities Form to take to the testing practitioner for completion.
- Educate workers about the return to work program.
- Pay full wages and benefits for the day or shift on which the injury occurred.
- Make certain that workers understand their obligations to co-operate.

## **5.2. Supervisors**

- Advise the employee of the availability of modified duties or a transitional work program and provide the required forms.
- Assist in the creation of and support the employee's modified duty program. Provide the worker with the modified work form.
- Maintain communication with the employee on modified duty and monitor the progress and the effectiveness on an individual case by case basis.
- Schedule regular meetings with the employee in order to communicate and assist in the evaluation of the program's effectiveness.
- Communicate with the injured worker and document the communication on the Contact Log. This communication is to be on a regular basis, at least once a week or as frequently as may be required. This will be determined on a case-by-case basis.

## **5.3. Injured Worker**

- Cooperate with the return-to-work process.
- Report your injury immediately/illness to your employer as soon as possible.
- Maintain regular contact with the supervisor and keep record of the correspondence. Reach out to the employer after their first health-care treatment begins to commence discussions on their return to work plan.
- Actively work with employer to identify suitable work opportunities.
- Provide WSIB with all the requested information about their return to work.
- Inform WSIB on any significant changes to their medical condition or income within 10 days of the change occurring. Such changes include:
  - Returning to work
  - Starting to receive other income or government benefits

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- Important updates on their medical conditions
- Disputes or disagreements between their employer on their return to work
- Communicate any concerns or problems to their immediate supervisor. By doing so, the problems will be ironed out early.
- Obtain the necessary forms from the treating agencies as may be required by the employer.
- Seek medical assistance immediately. Ensure that other scheduled rehabilitation activities, such as physical therapy or doctor's appointments are continued while on modified duty. These appointments are to be arranged whenever possible during non-work hours.
- Co-operate with all requests for documentation as required by WSIB and the Employer.

#### 5.4. Healthcare Professional

- Provide health, medical and functional abilities information as required.
- Fill in the forms as requested.
- Act as a resource.

## 6 Related Documents/Forms

- BESTCO-PRO-01.2-Document and Record Control Procedure
- **Functional Abilities Form**

## 7 Document and Record Maintenance


Documents and Records are maintained as per **BESTCO-PRO-01.2-Document and Record Control Procedure**.

## 8 Record Retention


Records are to be retained for a minimum of 3 years. Records will remain legible and readily identifiable.

## 9 Legislated/Other References

- Workplace Safety and Insurance Act, 1997, Part V, Return to Work s. 40-42
- O. Reg. 35/08: Return to Work and Re-Employment — Construction Industry under Workplace Safety and Insurance Act


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- O. Reg. 456/97: Functional Abilities Form under Workplace Safety and Insurance Act

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## Work Refusal Procedure

<b>Version No.</b>	<b>Reason for Revision:</b>	<b>Developed By and Date:</b>	<b>Reviewed By and Date:</b>	<b>Approved By and Date:</b>
1	To meet COR 2020 Standards, company's health and safety processes and Ontario's Health and Safety Legislative Requirements.	Emma Lisson, Health and Safety Coordinator 11 July, 2025	Michael Zaborsky and Ovidiu Cotiga, Senior Management 18 August, 2025	Michael Zaborsky, President 02 September, 2025

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## 1 Purpose

Bestco Construction Ltd. will ensure prompt and effective management of a work refusal where a worker believes a dangerous condition exists in the workplace.

## 2 Scope

The procedure applies to all Bestco Construction Ltd.'s employees. This procedure has been developed in accordance with the Ontario Occupational Health & Safety Act. The policy will be reviewed annually in accordance with applicable legislation.

## 3 Definitions

**Certified Member:** A Joint Health and Safety Committee (JHSC) member who has fulfilled the Chief Prevention Officer's (CPO) requirements to become certified. This includes training and other requirements the CPO deems necessary [Ref. OHSA].

**Compliance:** Meeting all requirements outlined within applicable legislation and regulations. [Ref. COR 2020 Audit Handbook].

**Conformity:** Fulfillment of a requirement. [Ref. COR 2020 Audit Handbook].


**Document:** Medium containing information related to the OHSMS. [Ref. COR 2020 Audit Handbook].

**Employer:** A person who employs one or more workers or contracts for the services of one or more workers and includes a contractor or subcontractor who performs work or supplies services and a contractor or subcontractor who undertakes with an owner, constructor, contractor, or subcontractor to perform work or supply services [Ref. OHSA].

**Hazard:** Source, situation, or act with a potential for harm in terms of human injury. [Ref. COR 2020 Audit Handbook].

**Health and Safety Representative:** A worker that brings awareness to safety concerns and facilitates communication between the constructor, supervisor, and the workers regarding safety.

- At a project or other workplace where no committee is required and where the number of workers regularly exceeds five, the constructor or employer shall cause the workers to select at least one health and safety representative from among the workers at the workplace who do not exercise managerial functions.

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[Ref. OHSA].

**Incident:** Work related event(s) in which an injury, fatality or occupational illness occurred; and includes event(s) where no injury or illness occurred, such as a near hit or property damage. [Ref. COR 2020 Audit Handbook].

**Joint Health and Safety Committee (JHSC):** An advisory body composed of worker and management representatives that are committed to improving health and safety conditions in the workplace. A joint health and safety committee is required at workplace,

- at which twenty or more workers are regularly employed;
- with respect to which an order to an employer is in effect;
- other than a construction project where fewer than twenty workers are regularly employed, with respect to which a regulation concerning designated substances applies.

This requirement does not apply to a constructor at a project at which work is expected to last less than three months [Ref. OHSA].

**Legal Requirements:** All applicable legislation, including but not limited to the Occupational Health and Safety Act and its regulations [Ref. COR 2020 Audit Handbook].

**Management:** People who have care and control over people and/or processes [Ref. COR 2020 Audit Handbook].

- **Middle Management (Project Manager, Office Manager, etc.):** A group of managers who administers and/or supervises the affairs of a department or division at the level below senior management of the company or organization.


**Non-conformity:** Non-fulfillment of a requirement [Ref. COR 2020 Audit Handbook].

**Organization:** Company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public, or private, that has its own functions, management, and administration. [Ref. COR 2020 Audit Handbook].

**Other Requirements:** Requirements or provisions the organization subscribes, however are not legally binding, such as industry standards. [Ref. COR 2020 Audit Handbook].

**Participation:** Involvement of workers, or worker representatives, in decision-making process(es) regarding the OHSMS. [Ref. COR 2020 Audit Handbook].

**Plan:** Detailed method for doing or achieving something. [Ref. COR 2020 Audit Handbook].

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**Policy:** A policy is a general commitment, direction or intention and is formally stated by top management. A quality policy statement should express top management's commitment to the implementation and improvement of its management system. [Ref. COR 2020 Audit Handbook].

**Procedure:** A documented, specified method to carry out an activity. **Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].

**Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].

**Record:** Document stating results achieved or providing evidence of activities performed. [Ref. COR 2020 Audit Handbook].

**Risk:** Combination of the likelihood of an occurrence of a hazardous event or exposure(s) and the severity of injury or occupation illness that can be caused by the event or exposure(s) [Ref. COR 2020 Audit Handbook].

**Senior Management (Company President, Vice President of Operations): -**

**Employer's Representative:** Person(s) at the highest level of an organization's structure responsible for leading, managing and /or directing an organization's day-to-day activities and/or operations. [Ref. COR 2020 Audit Handbook].


**Supervisor:** A person who has charge of a workplace or authority over a worker [Ref. OHSA].

**Supplier:** A person who supplies any machine, device, tool, or equipment under any rental, leasing, or similar arrangement for use in or about a workplace. [Ref. OHSA].

**Trade Union:** means a trade union as defined in the Labour Relations Act, 1995 that has the status of exclusive bargaining agent under that Act in respect of any bargaining unit or units in a workplace and includes an organization representing workers or persons to whom this Act applies where such organization has exclusive bargaining rights under any other Act in respect of such workers or persons [Ref. OHSA].

**Worker:** Any of the following, but does not include an inmate of a correctional institution or like institution or facility who participates inside the institution or facility in a work project or rehabilitation program:



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- a) A person who performs work or supplies services for monetary compensation.
- b) A secondary school student who performs work or supplies services for no monetary compensation under a work experience program authorized by the school board that operates the school in which the student is enrolled.
- c) A person who performs work or supplies services for no monetary compensation under a program approved by a college of applied arts and technology, university, private career college or other post-secondary institution.
- e) Such other persons as may be prescribed who perform work or supply services to an employer for no monetary compensation.

[Ref. OHSA].

**Workplace:** any land, premises, location, or thing at, upon, in or near which a worker works. [Ref. OHSA].

**Workplace Harassment:** means,

- a) 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
- b) workplace sexual harassment

[Ref. OHSA].

**Workplace Parties:** Includes, but is not limited to, the employer, supervisor(s), workers, constructor, visitors, and owner. [Ref. COR 2020 Audit Handbook].


**Workplace Sexual Harassment:** means,

- a) 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, or
- b) 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

[Ref. OHSA].

**Workplace Violence:** means,

- 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 the worker,

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- c) a statement or behaviour that it 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

[Ref. OHSA].

## 4 Procedure

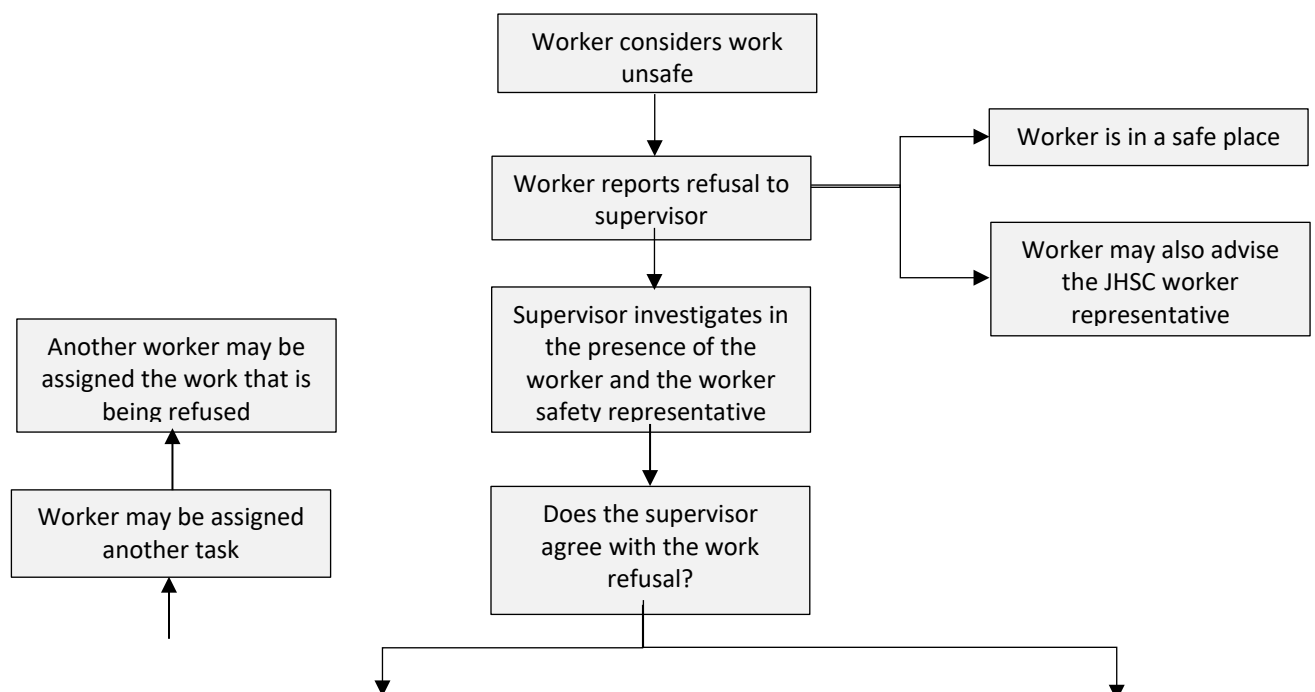
A worker may refuse to work or do particular work where he or she has reason to believe that,


- any equipment, machine, device, or thing the worker is to use or operate is likely to endanger himself, herself, or another worker;
- 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;
- workplace violence is likely to endanger himself or herself; or
- 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

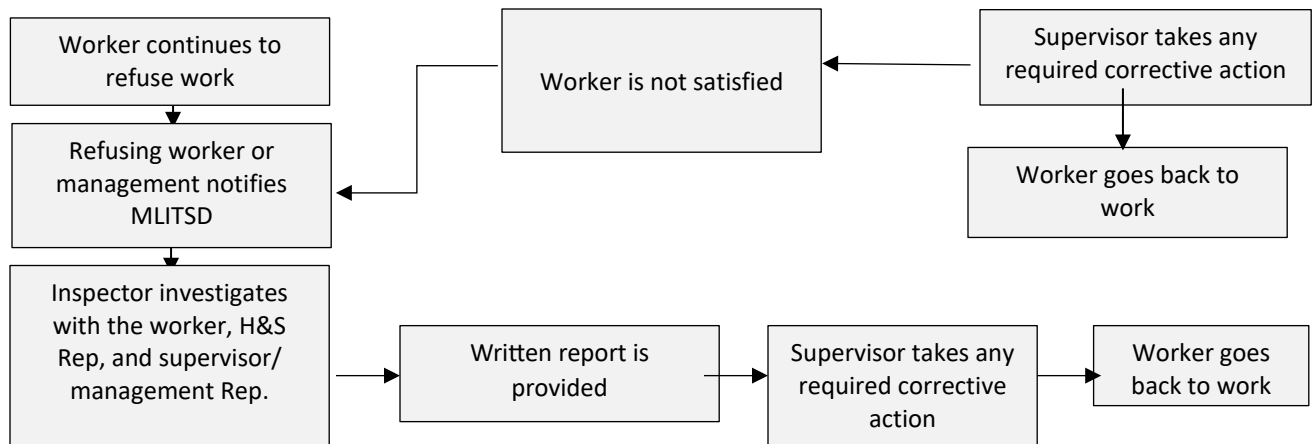
### 4.1. Report of Work Refusal:

The worker must notify their supervisor that they have a reason to believe their health and safety has been compromised. The worker must be directed to stay in a safe place near the work area. See the **Work Refusal Flow Chart**.

The supervisor will document all information using the **Work Refusal Form**.



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With a member of the JHSC or Health and Safety Representative, the supervisor will investigate the work refusal to determine if the unsafe situation exists.

Until the investigation is completed, the worker shall remain in a safe place


- In a safe place that is as near as reasonably possible to his or her work station; and
- Available to the employer or supervisor for the purposes of the investigation

If an unsafe situation exists, immediate corrective action will be taken.

- The supervisor will document the corrective action or the recommended corrective action.
- Signatures of the refusing worker and supervisor must be obtained.

If an unsafe situation does not exist, or corrective action taken eliminates the unsafe situation:

- Make clear to the refusing employee why an unsafe situation does not exist.
- Instruct the refusing worker to return to the previously assigned job. (Note: The refusing employee may continue to refuse)
- Signatures of the refusing worker and supervisor must be obtained.

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The refusing worker can be assigned another duty, and another worker may be assigned to do the work if:

- The worker is qualified to do the job; and
- The worker is advised of the reason(s) for refusal.

This must be done in the presence of:

- A member of the joint health and safety committee who represents workers
- A health and safety representative, or
- A worker who because of his or her knowledge, experience and training is selected by the trade union that represents the worker or, if there is no trade union, by the workers to represent them.

**NOTE:** The employee asked to do the work may also refuse. A second work refusal report is not necessary unless different reasons are given for the second work refusal.

If the refusing worker does not agree the condition has been adequately controlled, management must be notified. The worker or management must notify the Ministry of Labour, Immigration, Training and Skills Development (MLITSD). Management will fill out the **Continuing Work Refusal Form**.

The MLITSD inspector will investigate and provide a report; if the inspector's decision is in favour of the worker, then corrective actions must be taken.

## 5 Roles and Responsibilities

### 5.1. Senior Management


- Participate in the continuing work refusal process.
- Notify the MLITSD, if required.
- Fill out the **Continuing Work Refusal Form**, when required.

### 5.2. Supervisors

- Investigate the situation to determine if the work is unsafe.
- Document the process using the **Work Refusal Form**.
- Assign another duty to the worker, if required.

### 5.3. Workers

- Inform a supervisor that they are refusing to do unsafe work.

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- Cooperate through the work refusal process.
- Participate in the investigation.

#### 5.4. Joint Health and Safety Committee (If applicable)

- Participate in the investigation conducted by the supervisor.

## 6 Related Documents/Forms

- BESTCO-PRO-01.2-Document and Record Control Procedure.
- Work Refusal Form
- Continuing work Refusal Form

## 7 Document and Record Maintenance


Documents and Records are maintained as per **BESTCO-PRO-01.2-Document and Record Control Procedure**.

## 8 Record Retention

Records are to be retained for a minimum of 3 years. Records will remain legible and readily identifiable.

## 9 Legislated/Other References

- Occupational Health and Safety Act, Part V, s. 43-49
- Duties of employers – Occupational Health and Safety Act, s. 25, 26
- Duties of constructors – Occupational Health and Safety Act, s. 23
- Duties of supervisors – Occupational Health and Safety Act, s. 27
- Duties of workers– Occupational Health and Safety Act, s. 28
- Health and Safety Representative– Occupational Health and Safety Act, s. 8
- Joint Health and Safety Committee– Occupational Health and Safety Act, s. 9
- Occupational Health and Safety Act, Part V, s. (43-49) – Right to refuse or to stop work where health or safety in danger
- Occupational Health and Safety Act, s. 50

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## Management Review Policy

Bestco Construction Ltd.'s Management Review program is designed to provide guidelines to establish, implement, monitor, and maintain a process for conducting management review.

Senior management of Bestco Construction Ltd. is committed to allocating the time, budget, and resources for ensuring a review of the effectiveness of Occupational Health and Safety Management System (OHSMS) on an annual basis to ensure that continual improvement is being made to the OHSMS.

Occupational Health and Safety (OHS) objectives will be identified and measured as a result of the review. Senior Management will develop an action plan to meet the objectives and appoint designated team or personnel to implement the action plan.

Senior Management strives toward continuous improvement to OHSMS and encourages all workplace parties to provide feedback to OHSMS.

OHS objectives and action plans from Management Review will be communicated to all workplace parties.

The program and its performance shall be reviewed annually for sustainability, adequacy, and effectiveness.




Name: Michael Zaborsky

Title: President

Company: Bestco Construction (2005) Ltd.


Sept. 2, 2025

Date: 02 September, 2025

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# Management Review Procedure


<b>Version No.</b>	<b>Reason for Revision:</b>	<b>Developed By and Date:</b>	<b>Reviewed By and Date:</b>	<b>Approved By and Date:</b>
1	To meet COR 2020 Standards, company's health and safety processes and Ontario's Health and Safety Legislative Requirements.	Emma Lisson, Health and Safety Coordinator 11 July, 2025	Michael Zaborsky and Ovidiu Cotiga, Senior Management 18 August, 2025	Michael Zaborsky, President 02 September, 2025

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## 1 Purpose

The purpose of this procedure is to provide guidelines to establish, implement, monitor, and maintain a process for conducting management review at Bestco Construction Ltd. The procedure is also to ensure an annual review of the Occupational Health and Safety Management System (OHSMS) is conducted and necessary actions taken towards continual improvement to the OHSMS. OHS objectives are identified, and action plans are developed for continual improvement of the OHSMS.

## 2 Scope

Management Review policy and procedure applies to all work or work-related activities performed under the control of the organization by workplace parties.

## 3 Definitions

**Action Plan:** A plan that identifies the tasks to be accomplished, assigns responsibilities for completing each task, identifies the timeline in which it is to be completed, and records the actual action taken and completion dates. [Ref. COR 2020 Audit Handbook].

**Audit:** Systematic, independent, and documented process for obtaining evidence and evaluating it objectively to determine the extent to which pre-determined criteria are fulfilled. [Ref. COR 2020 Audit Handbook].


**Competency:** A person performing a task for, or on behalf of, the organization is competent to do so by means of appropriate:

- Knowledge of the hazards and risks associated with the tasks for the operations and activities.
- Demonstrated understanding and working knowledge of the control measures associated with the hazards and risks.
- Training regarding the hazards, risks, and associated control measures d)
- Aptitudes, such as skillset, ability, and willingness to deal with the hazards, risks, and control measure.

[Ref. COR 2020 Audit Handbook].

**Competent Person:** A person who,

- is qualified because of knowledge, training, and experience to organize the work and its performance,
- is familiar with this Act and the regulations that apply to the work, and

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- c) has knowledge of any potential or actual danger to health or safety in the workplace.

[Ref. OHSA].

**Competent Worker:** In relation to specific work, means a worker who,

- a) is qualified because of knowledge, training, and experience to perform the work,
- b) is familiar with the Occupational Health and Safety Act and with the provisions of the regulations that apply to the work, and
- c) has knowledge of all potential or actual danger to health or safety in the work.

[Ref. O. Reg. 213/91: Construction Projects under OHSA].

**Compliance:** Meeting all requirements outlined within applicable legislation and regulations. [Ref. COR 2020 Audit Handbook].

**Conformity:** Fulfillment of a requirement. [Ref. COR 2020 Audit Handbook].

**Continual Improvement:** Recurring activity to enhance performance and achieve a measurable result. [Ref. COR 2020 Audit Handbook].

**Corrective Action:** Action to eliminate the cause of a non-conformity and to prevent recurrence. There can be more than one cause for a non-conformity. [Ref. COR 2020 Audit Handbook].


**Document:** Medium containing information related to the OHSMS.

**Employer:** A person who employs one or more workers or contracts for the services of one or more workers and includes a contractor or subcontractor who performs work or supplies services and a contractor or subcontractor who undertakes with an owner, constructor, contractor, or subcontractor to perform work or supply services [Ref. OHSA].

**Hazard:** Source, situation, or act with a potential for harm in terms of human injury. [Ref. COR 2020 Audit Handbook].

**Incident:** Work related event(s) in which an injury, fatality or occupational illness occurred; and includes event(s) where no injury or illness occurred, such as a near hit or property damage. [Ref. COR 2020 Audit Handbook].

**Interested Parties:** Persons or groups, inside or outside the workplace, concerned with or affected by OHS performance of an organization. [Ref. COR 2020 Audit Handbook].

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**Legal Requirements:** All applicable legislation, including but not limited to the Occupational Health and Safety Act and its regulations. [Ref. COR 2020 Audit Handbook].

**Management:** People who have care and control over people and/or processes [Ref. COR 2020 Audit Handbook].

- **Middle Management (Project Manager, Office Manager, etc.):** A group of managers who administers and/or supervises the affairs of a department or division at the level below senior management of the company or organization.

**Non-conformity:** Non-fulfillment of a requirement [Ref. COR 2020 Audit Handbook].

**Objective:** Result to be achieved. An objective can be expressed in many ways, e.g., as an intended outcome, a purpose, an operational criterion, as an OHS objective or by the use of other words with similar meaning (e.g. aim, goal, or target) [Ref. COR 2020 Audit Handbook].

**Occupational Health and Safety (OHS):** Conditions and factors that affect or could affect the health and safety of employees or other workers, inclusive of temporary workers and contractor personnel, visitors, suppliers, vendors, or any other person in the workplace. [Ref. COR 2020 Audit Handbook].


**Occupational Health and Safety Management System (OHSMS):** As defined in the OHSA “means a coordinated system of procedures, processes and other measures that is designed to be implemented by employers to promote continuous improvement in occupational health and safety. [Ref. COR 2020 Audit Handbook].

**OHS Objective:** OHS goal, in terms of OHS performance, that an organization sets itself to achieve. [Ref. COR 2020 Audit Handbook].

**OHS Performance:** Measurable results of an organization’s management of its OHS risks. [Ref. COR 2020 Audit Handbook].

**OHS Policy:** Overall intentions and direction of an organization related to its OHS performance as formally expressed by senior management in relation to the implementation of the OHSMS. [Ref. COR 2020 Audit Handbook].

**Organization:** Company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public, or private, that has its own functions, management, and administration. [Ref. COR 2020 Audit Handbook].

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**Other Requirements:** Requirements or provisions the organization subscribes, however are not legally binding, such as industry standards. [Ref. COR 2020 Audit Handbook].

**Participation:** Involvement of workers, or worker representatives, in decision-making process(es) regarding the OHSMS. [Ref. COR 2020 Audit Handbook].

**Plan:** Detailed method for doing or achieving something. [Ref. COR 2020 Audit Handbook].

**Policy:** A policy is a general commitment, direction or intention and is formally stated by top management. A quality policy statement should express top management's commitment to the implementation and improvement of its management system. [Ref. COR 2020 Audit Handbook].

**Preventative Action:** Action to eliminate the cause of potential non-conformity or another potential undesirable potential situation. There can be more than one cause for a potential nonconformity. (For the purposes of this Standard, this refers to any action taken to fix a potential OHS problem.) [Ref. COR 2020 Audit Handbook].

**Procedure:** A documented, specified method to carry out an activity. **Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].


**Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].

**Project:** a construction project, whether public or private, including,

- a) the construction of a building, bridge, structure, industrial establishment, mining plant, shaft, tunnel, caisson, trench, excavation, highway, railway, street, runway, parking lot, cofferdam, conduit, sewer, watermain, service connection, telegraph, telephone or electrical cable, pipe line, duct or well, or any combination thereof,
- b) the moving of a building or structure, and
- c) any work or undertaking, or any lands or appurtenances used in connection with construction.

[Ref. OHSA].

**Qualitative:** Relating to the nature or description of something, rather than to its quantity [Ref. COR 2020 Audit Handbook].

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**Quantitative:** The measurement or number of something rather than its quality [Ref. COR 2020 Audit Handbook].

**Record:** Document stating results achieved or providing evidence of activities performed. [Ref. COR 2020 Audit Handbook].

**Senior Management (Company President, Vice President of Operations):** Person(s) at the highest level of an organization's structure responsible for leading, managing and /or directing an organization's day-to-day activities and/or operations [Ref. COR 2020 Audit Handbook].

**Worker:** Any of the following, but does not include an inmate of a correctional institution or like institution or facility who participates inside the institution or facility in a work project or rehabilitation program:

- a) A person who performs work or supplies services for monetary compensation.
- b) A secondary school student who performs work or supplies services for no monetary compensation under a work experience program authorized by the school board that operates the school in which the student is enrolled.
- c) A person who performs work or supplies services for no monetary compensation under a program approved by a college of applied arts and technology, university, private career college or other post-secondary institution.
- e) Such other persons as may be prescribed who perform work or supply services to an employer for no monetary compensation.


[Ref. OHSA].

**Workplace:** any land, premises, location, or thing at, upon, in or near which a worker works. [Ref. OHSA].

**Workplace Parties:** Includes, but is not limited to, the employer, supervisor(s), workers, constructor, visitors, and owner. [Ref. COR 2020 Audit Handbook].

## 4 Procedure

Senior Management of Bestco Construction Ltd. reviews OHSMS at minimum annually. The Management Review procedure ensures necessary information is collected prior to the Annual Management Meeting. This procedure outlines the process that will be used to review the progress of Bestco Construction Ltd.'s OHSMS towards reaching its established Occupational Health and Safety objectives, and assigns responsibility for scheduling, conducting, and documenting the reviews.

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#### 4.1. Planning and Scheduling Management Review

Senior Management will schedule an annual meeting (maximum 12 calendar months) to review the Occupational Health and Safety Management System (OHSMS) of the previous year. Meeting dates will be communicated through email.


#### 4.2. Designating a Management Review Team

For each year of Management Review, Senior Management of Bestco Construction Ltd. will designate a team dedicated to planning, scheduling, gathering inputs, conducting the review, and communicating the actions of review at specified periods.

Senior Management of Bestco Construction Ltd. designates the following responsible personnel/team to collect the above input for the management review:

No.	General	Responsibility
	Maintaining Records	Senior Management Representative
	<b>Inputs Collected from:</b>	
1	Evaluation of the effectiveness of all elements of the OHSMS	Health and Safety Coordinator
2	Status of actions from previous management reviews	Senior Management Representative
3	Results of internal audits, including COR™ audits	Internal Auditor
4	Evaluations of compliance with legal requirements	Health and Safety Coordinator
5	Results of participation and consultation with employees/Health and Safety Representative /Joint Health and Safety Committee	Health and Safety Coordinator
6	Communication from external parties	Senior Management Representative
7	OHS performance of the organization	Senior Management Representative
8	Evaluation of the extent to which OHS objectives have been met	Senior Management Representative
9	Status of incident investigations, trends identified, implementation of corrective actions,	Health and Safety Coordinator




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	implementation of preventative actions and status of actions taken	
10	Changing circumstances related to OHS such as developments in legal requirements or technology	Health and Safety Coordinator & Senior Management Representative
11	Identified barriers to worker participation in the OHSMS	Health and Safety Coordinator
12	Recommendations for improvement	Health and Safety Coordinator (Collective input from Workers)
	<b>Outputs</b>	
1	OHS Policy Updates & Revisions to OHSMS	Health and Safety Coordinator
2	OHS Objectives, Action Plan & Communication	Senior Management Representative
3	Time, budget & resource allocation	Senior Management Representative
4	Actions to remove barriers to worker participation	Senior Management Representative

#### 4.3. Gathering Input for Management Review

Senior Management will consider the following inputs as part of the Management Review:

- Evaluation of the effectiveness of all elements of the OHSMS
  - The Bestco Construction Ltd.'s OHSMS is designed with 14 elements and all the elements will be evaluated as part of this review.
- Status of actions from previous management reviews
  - Senior management will ensure management reviews are conducted every year. OHS objectives are developed, and Action Plan is created to meet the objectives. Previous year Action Plan will be evaluated as part of this review.
- Results of internal audits, including COR™ audits
- Evaluations of compliance with legal requirements
  - Documents and Records of **BESTCO-PRO-13.0 - Legislation and Other Requirements** shall be evaluated as part of this review. Any legislative updates in OHS Acts and/or regulations will be monitored and documented.
- Results of participation and consultation with employees/Health and Safety Representative /Joint Health and Safety Committee

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- Communication from external parties
- OHS performance of the organization
  - Documents and Records of **BESTCO-PRO-12.0 – Statistics and Records** shall be utilized for this review.
- Evaluation of the extent to which OHS objectives have been met
- Status of incident investigations, trends identified, implementation of corrective actions, implementation of preventative actions and status of actions taken
- Changing circumstances related to OHS such as developments in legal requirements or technology
  - Documents and Records of **BESTCO-PRO-14.2 – Management of Change** shall be considered as part of this review.
- Identified barriers to worker participation in the OHSMS.
- Recommendations for improvement.
- The information will be prepared in advance and presented in Management Review Meeting.

#### 4.4. Output from Management Review


Based on the documents and records presented by the Input team during the Management Review, Senior Management of Bestco Construction Ltd. will evaluate the OHSMS and identify the following outputs:

- OHS policy updates, if applicable
- Measurable OHS objectives
- Action plan to achieve objectives
- Required resources
- Revisions to any other elements of the OHSMS as appropriate
- Removed barriers to worker participation in the OHSMS

Health and Safety Coordinator will ensure the OHS Policies are updated if needed. Senior Management will determine the SMART (Specific, Measurable, Achievable, Realistic and Time-bound) OHS objectives for the upcoming year for the organization to focus, based on the review. Clear action plan with target dates along with assigned responsibilities, will be developed and communicated to all workplace parties. Senior Management will monitor the progress on a regular basis. Previous year OHS objectives will be assessed in every Management Review meeting to evaluate the extend to which OHS objectives are met.

## 5 Roles and Responsibilities



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Responsibilities and accountabilities of workplace parties ensures a commitment by workplace parties ensuring a safe and healthy work environment. The responsibilities of workplace parties are outlined as per the Organization Chart and listed below with the specific roles within the organization.

### 5.1. Senior Management

- Provide time, budget, and resources, as required.
- Designate team to provide input to the OHSMS.
- Participate in Management Review Meeting.
- Review input documents received from various workplace parties.
- Identify OHS objectives, develop action plans and designate team/personnel to implement the action plans for continual improvement of the OHSMS.
- Communicate the OHS objectives and action plans to all workplace parties.
- Identify and remove barriers, if any, on worker participation.

### 5.2. Health and Safety Coordinator

- Administer and coordinate Management Review Meetings.
- Evaluate effectiveness of all elements of the OHSMS.
- Provide input based on CORTM Internal/External Audits.
- Provide input on OHS Performance based on Statistics and Records review meetings.
- Monitor legislative changes on an ongoing basis and provide input to Senior Management.
- Ensure proper documentation are maintained.


### 5.3. Joint Health and Safety Committee (JHSC) (if applicable)

- Provide input for continual improvement to OHSMS based monthly inspections, JHSC recommendations, worker feedback received.

### 5.4. Supervisors

- Assist in Management Review as required.
- Provide input for continual improvement to OHSMS.
- Provide feedback to Senior Management upon reviewing the OHS objectives and Action Plan.

### 5.5. Workers

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- Provide input for continual improvement to OHSMS.
- Provide feedback to supervisor upon reviewing the OHS objectives and Action Plan.

## 6 Related Documents/Forms

- Bestco Construction Ltd. OHSMS (Documents and Records)
- BESTCO-PRO-14.2 – Management of Change
- BESTCO-PRO-13.0 – Legislation and Other Requirement
- BESTCO-PRO-01.2 – Document and Record Control Procedure.
- Management Review Meeting Minutes
- Statistical Review Meeting Minutes
- Management Review Inputs
- Company-Wide Meeting Minutes
- Management Review Action Plan
- OHS Objectives

## 7 Document and Record Maintenance


Documents and Records are maintained as per **BESTCO-PRO-01.2-Document and Record Control Procedure**.

## 8 Record Retention

Records are to be retained for a minimum of 3 years. Records will remain legible and readily identifiable.

## 9 Legislated/Other References

- All applicable legislations and standards.
- ISO-45001 - Occupational health and safety management systems
- COR™ Guidelines

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## Management of Change Policy

Bestco Construction Ltd.'s Management of Change Policy is designed to provide guidelines to establish, implement, monitor, and maintain a process for managing changing within the organization. It is aimed at documenting a procedure which will ensure that the changes are documented, and the hazards are assessed and addressed when changes occur.

This policy applies to all personnel (originator, reviewer, and approver) who are involved in the process of change management and all workplace parties who are directly and/or indirectly affected by the changes.

Senior Management is committed to ensuring the implementation of the Management of Change program by allocating the time, budget, and resources, as required.

Individuals requesting changes (originators) are required to provide sufficient information for the reviewers to effectively assess the proposed modifications. Each proposed change will be evaluated on a case-by-case basis and by a team of competent personnel.

Originators, reviewers, approvers and affected workplace parties are responsible to follow the Management of Change procedure.

Hazards arising from the changes will be assessed and appropriate controls will be implemented. Approved changes along with the job hazard assessment will be communicated to all workplace parties who are directly and/or indirectly affected by the changes.

The program and its performance shall be reviewed annually for sustainability, adequacy, and effectiveness.




Name: Michael Zaborsky

Title: President

Company: Bestco Construction (2005) Ltd.


Sept. 2, 2025

Date: 02 September, 2025

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# Management of Change Procedure

<b>Version No.</b>	<b>Reason for Revision:</b>	<b>Developed By and Date:</b>	<b>Reviewed By and Date:</b>	<b>Approved By and Date:</b>
1	To meet COR 2020 Standards, company's health and safety processes and Ontario's Health and Safety Legislative Requirements.	Emma Lisson, Health and Safety Coordinator 11 July, 2025	Michael Zaborsky and Ovidiu Cotiga, Senior Management 18 August, 2025	Michael Zaborsky, President 02 September, 2025

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## 1 Purpose

The purpose of this procedure is to provide guidelines to establish, implement, monitor, and maintain a process for managing changes within Bestco Construction Ltd. The procedure is also to ensure that the changes are documented, and the hazards are assessed and addressed when changes occur.

## 2 Scope

Management of Change policy and procedure applies to all work or work-related activities performed under the control of the organization by workplace parties.

## 3 Definitions

**Competency:** A person performing a task for, or on behalf of, the organization is competent to do so by means of appropriate:

- Knowledge of the hazards and risks associated with the tasks for the operations and activities.
- Demonstrated understanding and working knowledge of the control measures associated with the hazards and risks.
- Training regarding the hazards, risks, and associated control measures
- Aptitudes, such as skillset, ability, and willingness to deal with the hazards, risks, and control measure.

[Ref. COR 2020 Audit Handbook].

**Competent Person:** A person who,


- is qualified because of knowledge, training, and experience to organize the work and its performance,
- is familiar with this Act and the regulations that apply to the work, and
- has knowledge of any potential or actual danger to health or safety in the workplace.

[Ref. OHSA].

**Competent Worker:** In relation to specific work, means a worker who,

- is qualified because of knowledge, training, and experience to perform the work,
- is familiar with the Occupational Health and Safety Act and with the provisions of the regulations that apply to the work, and
- has knowledge of all potential or actual danger to health or safety in the work.

[Ref. O. Reg. 213/91: Construction Projects under OHSA].

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**Conformity:** Fulfillment of a requirement. [Ref. COR 2020 Audit Handbook].

**Continual Improvement:** Recurring activity to enhance performance and achieve a measurable result. [Ref. COR 2020 Audit Handbook].

**Corrective Action:** Action to eliminate the cause of a non-conformity and to prevent recurrence. There can be more than one cause for a non-conformity. [Ref. COR 2020 Audit Handbook].

**Document:** Medium containing information related to the OHSMS.

**Employer:** A person who employs one or more workers or contracts for the services of one or more workers and includes a contractor or subcontractor who performs work or supplies services and a contractor or subcontractor who undertakes with an owner, constructor, contractor, or subcontractor to perform work or supply services [Ref. OHSA].

**Hazard:** Source, situation, or act with a potential for harm in terms of human injury. [Ref. COR 2020 Audit Handbook].

**Hazard Assessment:** The process of conducting a systematic review to:

- Identify hazards associated with work activities
- Analyze or evaluate the risks(s) associated with the hazards
- Determine appropriate ways to eliminate or control the hazards

[Ref. COR 2020 Audit Handbook].


**Incident:** Work related event(s) in which an injury, fatality or occupational illness occurred; and includes event(s) where no injury or illness occurred, such as a near hit or property damage. [Ref. COR 2020 Audit Handbook].

**Interested Parties:** Persons or groups, inside or outside the workplace, concerned with or affected by OHS performance of an organization. [Ref. COR 2020 Audit Handbook].

**Legal Requirements:** All applicable legislation, including but not limited to the Occupational Health and Safety Act and its regulations. [Ref. COR 2020 Audit Handbook].

**Management:** People who have care and control over people and/or processes [Ref. COR 2020 Audit Handbook].

- **Middle Management (Project Manager, Office Manager, etc.):** A group of managers who administers and/or supervises the affairs of a department or division at the level below senior management of the company or organization.

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**Non-conformity:** Non-fulfillment of a requirement [Ref. COR 2020 Audit Handbook].

**Objective:** Result to be achieved. An objective can be expressed in many ways, e.g., as an intended outcome, a purpose, an operational criterion, as an OHS objective or by the use of other words with similar meaning (e.g., aim, goal, or target) [Ref. COR 2020 Audit Handbook].

**Occupational Health and Safety (OHS):** Conditions and factors that affect or could affect the health and safety of employees or other workers, inclusive of temporary workers and contractor personnel, visitors, suppliers, vendors, or any other person in the workplace. [Ref. COR 2020 Audit Handbook].

**Occupational Health and Safety Management System (OHSMS):** As defined in the OHSA “means a coordinated system of procedures, processes and other measures that is designed to be implemented by employers to promote continuous improvement in occupational health and safety. [Ref. COR 2020 Audit Handbook].

**OHS Objective:** OHS goal, in terms of OHS performance, that an organization sets itself to achieve. [Ref. COR 2020 Audit Handbook].

**OHS Performance:** Measurable results of an organization’s management of its OHS risks. [Ref. COR 2020 Audit Handbook].


**OHS Policy:** Overall intentions and direction of an organization related to its OHS performance as formally expressed by senior management in relation to the implementation of the OHSMS. [Ref. COR 2020 Audit Handbook].

**Organization:** Company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public, or private, that has its own functions, management, and administration. [Ref. COR 2020 Audit Handbook].

**Other Requirements:** Requirements or provisions the organization subscribes, however are not legally binding, such as industry standards. [Ref. COR 2020 Audit Handbook].

**Owner:** Includes a trustee, receiver, mortgagee in possession, tenant, lessee, or occupier of any lands or premises used or to be used as a workplace, and a person who acts for or on behalf of an owner as an agent or delegate. [Ref. OHSa].



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**Participation:** Involvement of workers, or worker representatives, in decision-making process(es) regarding the OHSMS. [Ref. COR 2020 Audit Handbook].

**Plan:** Detailed method for doing or achieving something. [Ref. COR 2020 Audit Handbook].

**Policy:** A policy is a general commitment, direction or intention and is formally stated by top management. A quality policy statement should express top management's commitment to the implementation and improvement of its management system. [Ref. COR 2020 Audit Handbook].

**Preventative Action:** Action to eliminate the cause of potential non-conformity or other potential undesirable potential situation. There can be more than one cause for a potential nonconformity. (For the purposes of this Standard, this refers to any action taken to fix a potential OHS problem.) [Ref. COR 2020 Audit Handbook].

**Procedure:** A documented, specified method to carry out an activity. **Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].

**Process:** A set of interrelated or interacting activities that transforms inputs into outputs. [Ref. COR 2020 Audit Handbook].


**Project:** a construction project, whether public or private, including,

- a) the construction of a building, bridge, structure, industrial establishment, mining plant, shaft, tunnel, caisson, trench, excavation, highway, railway, street, runway, parking lot, cofferdam, conduit, sewer, watermain, service connection, telegraph, telephone or electrical cable, pipe line, duct or well, or any combination thereof,
- b) the moving of a building or structure, and
- c) any work or undertaking, or any lands or appurtenances used in connection with construction.

[Ref. OHSA].

**Qualitative:** Relating to the nature or description of something, rather than to its quantity [Ref. COR 2020 Audit Handbook].

**Record:** Document stating results achieved or providing evidence of activities performed. [Ref. COR 2020 Audit Handbook].

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**Residual Risk:** Combination of the likelihood of the occurrence after the hierarchy of controls has been implemented for an identified hazard [Ref. COR 2020 Audit Handbook].

**Risk:** Combination of the likelihood of an occurrence of a hazardous event or exposure(s) and the severity of injury or occupation illness that can be caused by the event or exposure(s) [Ref. COR 2020 Audit Handbook].

**Risk Assessment:** Process of evaluating the risk(s) arising from a hazard(s), taking into account the adequacy of any existing controls, and deciding whether or not the risk(s) is acceptable [Ref. COR 2020 Audit Handbook].

**Senior Management (Company President, Vice President of Operations):** Person(s) at the highest level of an organization's structure responsible for leading, managing and /or directing an organization's day-to-day activities and/or operations. [Ref. COR 2020 Audit Handbook].

**Subcontractor:** A person or organization that takes a portion of a contract from the principal contractor or from another subcontractor.

**Worker:** Any of the following, but does not include an inmate of a correctional institution or like institution or facility who participates inside the institution or facility in a work project or rehabilitation program:


- a) A person who performs work or supplies services for monetary compensation.
- b) A secondary school student who performs work or supplies services for no monetary compensation under a work experience program authorized by the school board that operates the school in which the student is enrolled.
- c) A person who performs work or supplies services for no monetary compensation under a program approved by a college of applied arts and technology, university, private career college or other post-secondary institution.
- e) Such other persons as may be prescribed who perform work or supply services to an employer for no monetary compensation.

[Ref. OHSA].

**Workplace:** any land, premises, location, or thing at, upon, in or near which a worker works. [Ref. OHSA].

**Workplace Parties:** Includes, but is not limited to, the employer, supervisor(s), workers, constructor, visitors, and owner. [Ref. COR 2020 Audit Handbook].

## 4 Procedure

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Management of Change (MOC) is a process to ensure that when changes occur hazards are assessed and addressed to minimize the impact of hazards into the work environment.

As a minimum, the following aspects will be addressed:

- Changes in legal requirements.
- Significant changes in work processes, control measures, equipment, organization, work location.
- Introduction of new products, processes, or services.
- Introduction of new developments in OHS knowledge or technology.


A Job Hazard Analysis (JHA) shall be developed or existing JHA shall be reviewed prior to implementing any change to ensure that all OHS risks to people, environment, property, and surroundings are suitably addressed. This exercise must take into consideration both planned and unplanned changes, as well as sudden or gradual changes.

All areas of potential change must be considered including:

- Equipment, processes, and layout.
- Operation and maintenance procedures.
- Design, construction, repair, and maintenance.
- Materials used and inherent properties.
- Organizational structure and responsibilities.
- Personnel training or competency requirements.
- Personnel changes.
- Compliance obligations.

The following steps outline the MOC procedure and shall be followed as necessary.

1. Individual requesting a change (originator) to a specific location and/or to a work process completes the **Management of Change (MOC) Form** with all available information. To ensure the reviewers ability to effectively assess the proposed modifications sufficient information must be available when the Form is being completed and distributed for review.
2. For the purpose of the status of each change, it will be determined to be considered permanent or temporary. If it is considered temporary it must have a pre-defined and limited time period that cannot exceed 12 months. If the duration of the temporary change is identified for 12 months, at a minimum, the MOC must be reviewed at the 6-month mark. Once this time period has expired, the change must be returned to the original design or pre-change conditions or the MOC re-approval process initiated.

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3. Originator submits the **MOC Form** along with necessary supporting background information (e.g., diagrams, drawings, photo's, etc.) regarding the proposed change to the Health and Safety Coordinator. The Health and Safety Coordinator screens the request documentation to verify:
  - a. Change is covered by the MOC program
  - b. Appropriate "Tier" selection
  - c. Determines if a Pre-Start Health and Safety Review is required (New Equipment or Equipment Modification)
  - d. Assigns the MOC number
  - e. Documents the request within the MOC Tracker
  - f. Initiates the review process
4. The Health and Safety Coordinator will make the entry of the MOC in the **Management of Change Tracker** and will then distribute the **MOC Form** to the appropriate reviewers electronically, outlining the timeline for approval. Originator should factor in a standard review and approval turn-around to be two (2) weeks unless noted as a "Rush". A two (2) tiered review approach has been developed based on the complexity of the proposed change.
  - a. Tier 1 Change – a minor change to the covered process area including but not limited to operating procedures, temporary shutdown of ancillary production equipment, adding process instrumentation and adding an additional control to an existing distributed control system.

The following parties are responsible to review and approve these types of changes:


- o Joint Health and Safety Committee (JHSC) (if applicable) or Health and Safety Representative
  - o Internal subject matter expert (to assist JHSC), if applicable
- b. Tier 2 Change - a major change that has a significant impact on process conditions or system parameters including but not limited to installation of new equipment, changes to design parameters decommissioning equipment, and deviation from standard operating safeguards.

In addition to the personnel identified in a Tier 1 approval, the following individuals are also responsible to review and approve these types of changes:

- o Project Manager
- o Senior Management Representative

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5. Each proposed change must be evaluated on a case-by-case basis and by a team of employees familiar with the covered process. The specific type of evaluation technique utilized to review a proposed change is dependent upon how complex, extensive, and well understood the change is within the covered process. For complex equipment/process changes a "What-If" Hazard Analysis may be warranted. For other process changes, an electronic review of the **MOC Form**, an informal site review, or a brief meeting may be appropriate to evaluate and approve a change.
6. The MOC approval employees will review the electronic copy of the **MOC Form** and communicate any questions, clarifications, or concerns to the MOC originator. If there are substantial issues identified by the reviewer to the proposed change, notification to the originator and Health and Safety Coordinator should be made formally in writing, detailing the technical basis for the MOC rejection. If the technical basis for the rejection cannot be reconciled by the MOC originator and the individual rejecting the change, the MOC originator will schedule a meeting with the entire review team to review the technical basis for not authorizing the change and to define an appropriate path forward. If the proposed MOC is acceptable, the MOC review team individuals will sign and date the original **MOC Form** when presented.
7. During the review process any MOC approver can request additional actions associated with the proposed change to assist in risk mitigation or maintaining appropriate safeguards currently associated with the covered process.
8. If a reviewer deems their approval contingent upon some specific action, clarification, or modification, it will be noted accordingly on the **MOC Form**. It is recommended that the specifics relating to the contingency is reviewed with the MOC Originator to assess overall impact to the change or the potential for an alternate approach.
9. The originator can only implement the proposed change after the appropriate reviewers have documented their approval through a signature on the **MOC Form**. If at any time during implementation there is a deviation to original proposed modifications, the **MOC Form** must be updated, and the approval process re-initiated before proceeding.
10. Once the MOC has been approved, originator will communicate the changes to other individuals, departments, or operating units that may be affected by the change or while the changes are being implemented. The type of communication method will be determined by the originator but can include posting the **MOC Form** in a commonly used area for employee notices, electronic distribution, or holding a brief meeting.
11. If a **Pre-Start Health and Safety Review (PSR)** is required, prior to starting/re-starting equipment the Health and Safety Coordinator schedules a **PSR** with the

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appropriate individuals. The requirements outlined with the PSR program will be followed when conducting the equipment assessment.

PSR is required in following conditions:

- because a new apparatus, structure or protective element is to be constructed, added, or installed or a new process is to be used; or
  - because an existing apparatus, structure, protective element, or process is to be modified and one of the following steps must be taken to obtain compliance with the applicable provision:
    - New or modified engineering controls are used.
    - Other new or modified measures are used.
    - A combination of new, existing, or modified engineering controls and other new or modified measures is used.
12. If a hazard assessment is required as an output, responsible individuals will be appointed to conduct the hazard assessment by the Health and Safety Coordinator. Controls will be implemented and communicated to all affected workplace parties.
  13. The Health and Safety Coordinator will track completion of all assigned actions associated with an MOC and upon completion, Close the MOC. All reviews, approvals will be maintained on the **MOC Tracker**. Closure of an MOC will be communicated to the individuals who reviewed and approved of the change. In addition, the safety manager will maintain the appropriate documentation associated with the MOC collected by the various reviewers or supporting personnel (e.g., 3rd party contractors, etc.).
  14. Post Evaluation will be organized by the Health and Safety Coordinator as applicable, communications will be made and the MOC will be closed.

#### **4.1. Hazard Assessment, Analysis and Controls**


If new hazards are introduced based on the approved changes, hazard assessment will be conducted, and controls will be implemented in a timely manner. Please refer to “Hazard Assessment, Analysis and Control” and “Controls” policies and procedures for the detailed information.

#### **4.2. Applicable Training**

The affected parties will be trained on the changes, hazards due to the changes and implemented controls.

#### **4.3. Communication**



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The Change Management Policy and Procedure shall be communicated to all applicable Bestco Construction Ltd. workplace parties as required. Bestco Construction Ltd. will ensure that communication with all workplace parties will be notified when there are changes affecting the health and safety of the work. When the changes are approved, Bestco Construction Ltd. will ensure that any new or potential hazards are appropriately assessed and controlled, and that the documentation supporting these changes is obtained and communicated to all parties through site meetings/toolbox talks, and memos. Site Supervisors will be the primary personnel communicating between Bestco Construction Ltd. and project site workers.

## 5 Roles and Responsibilities

Responsibilities and accountabilities of workplace parties ensures a commitment by workplace parties ensuring a safe and healthy work environment. The responsibilities of workplace parties are outlined as per the Organization Chart and listed below with the specific roles within the organization.

### 5.1. Senior Management


- Ensure compliance of the Management of Change policy and procedure by all workplace parties.
- Provide support for the implementation and delivery of the Management of Change Program.
- Ensure that time, budget, and resources required for the compliance of this policy and procedure are provided.
- Ensure that all relevant workplace parties are trained on the Management of Change Program.
- Participate in the review/approval process, as applicable.

### 5.2. Originator

- Provide sufficient information for the reviewers when originating a change, to effectively assess the proposed modifications.
- Aid reviewers and approvers, as required.

### 5.3. Reviewer

- Participate in the review process, as required.
- Include inputs from subject matter experts, as necessary.

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- Review **MOC forms** and provide response to the originator, Health and Safety Coordinator and/or approvers as applicable, in a timely manner.

#### 5.4. Approver

- Participate in the approval process, as required.
- Include inputs from subject matter experts if required.
- Review **MOC forms** and provide response to the originator, Health and Safety Coordinator and/or review team as applicable, in a timely manner

#### 5.5. Document Controller

- The administration of the document management process, updating document numbering, versions, revision histories.
- Maintenance of the **Master Documented Information List**.
- Ensuring only approved documents are disseminated, and obsolete versions are retained as records or disposed of.


#### 5.6. Supervisors

- Participate in the review process, as applicable.
- Conduct hazard assessments once the changes are approved.
- Implement control measures, as applicable.
- Notify the workers and affected parties on the changes, hazards and implemented controls.
- Ensure that the contractors on site are aware of the requirements and changes of this policy and program, if applicable.
- Ensure that the workers are trained in this policy/program and comply with the various requirements.

#### 5.7. Health and Safety Coordinator

- Responsible to administer the document management process.
- Verify document quality by ensuring documents are developed using correct format.
- Distribute **MOC Forms** to the appropriate reviewers after the screening process.
- Follow up with originators, reviewers and/or approvers, as applicable.
- Maintain the document register.
- Ensure only approved versions of documents are available for use and archive obsolete documents.



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- Provide all required documentation as outlined in this procedure upon request.
- Appoint the team to conduct hazard assessment, if applicable.
- Initiate a **Pre-Start Safety Review (PSR)**, if applicable.

#### 5.8. Joint Health and Safety Committee (JHSC) (if applicable)

- Participate in the review process, as applicable.

## 6 Related Documents/Forms

- BESTCO-PRO-01.2 – Document and Record Control Procedure
- BESTCO-PRO-02.0 – Hazard Assessment, Analysis and Control Procedure
- BESTCO-PRO-03.0 – Control Procedure
- BESTCO-PRO-13.0 – Legislation and Other Requirements Procedure
- Pre-Start Safety Review (PSR)
- Management of Change (MOC) Tracker
- Management of Change (MOC) Form
- Management of Change Form Completion Instructions
- Job Hazard Assessment
- Toolbox talks
- Meeting Agenda
- Meeting Minutes

## 7 Document and Record Maintenance


Documents and Records are maintained as per **BESTCO-PRO-01.2-Document and Record Control Procedure**.

## 8 Record Retention

Records are to be retained for a minimum of 3 years. Records will remain legible and readily identifiable.

## 9 Legislated/Other References

- O. Reg. 213/91: Construction Projects under Occupational Health and Safety Act
- O. Reg. 851: Industrial Establishments under Occupational Health and Safety Act s. 7-8
- ISO-45001 - Occupational health and safety management systems.

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- IHSA COR™ 2020 Guidelines
- All applicable legislations and standards.