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# HEALTH & SAFETY PROGRAM MANUAL

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EVERYBODY | EVERYWHERE | EVERYDAY

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**See something that concerns you? Report it.**  
*If you see or suspect activity that is harassing, abusive, unsafe, or just not right, call our Ethics Helpline, 24 hours a day, 7 days a week. You may choose to keep your identity confidential, and the more information you give, the more we can help. You can also contact our Compliance & Ethics Department.*

## ETHICS HELPLINE

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## GENERAL

Govan Brown Associates Limited further known as Govan Brown or "GB" developed health and safety program as an organized, written action plan with demonstrated commitment to define safety responsibilities, identify and control hazards, and allocate resources in the reduction of accidents/injuries as well as all loss causing situations and respond to emergencies that result in the prevention of accidents and occupational diseases.

GB Health and Safety program established to achieve the desired outcomes through compliance with regulatory requirements and interacting processes to deliver continual occupational health and safety (OHS) improvement with ultimate objectives to integrate safety and health into all work practices and conditions, and to prevent injuries and illness at work

GB health and safety program is a live document, constantly monitored and regularly updated to assist in meeting all of the expectations outlined in our health and safety policy statement.

## SCOPE

GB Occupational Health and Safety Management System (OHSMS) as well as overall intentions, strategic directions related to OHS performance applies to GB head office, GB branches and workplaces operations and/or activities including project site(s) within Canada.

## CONTENTS

Our Occupational Health and Safety Management System (OHSMS) Manual also known as "OHS Program" is a comprehensive guide and coordinated system of interrelated or interacting elements, procedures, processes and other measures that are implemented in order to promote continuous improvement in occupational health and safety.

It contains specific policies, procedures, documents and forms to be utilized through the provision of information, training, instruction and supervision and to be used by relevant parties, person or organisation that can affect, be affected by, or perceive itself to be affected by a company decision or activity including but not limited senior / middle management representatives, appointed supervisory staff, Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) / Joint Occupational Health and Safety Committee (JOHSC), members and/or line management and workers.

- **Policies** – intentions and direction of company as formally expressed by top management.
- **Procedures** – a documented method to carry out an activity with identified the purpose, scope, element goals and procedure for each element section.
- **Documents** – medium containing information related to Health and Safety Program including reference documentation established to support and implement the above procedures.
- **Forms** – includes related document and records, aiming to ease of procedure report developed to simplify the procedure and to state results achieved or provided evidence of activities performed.

The forms related to each of the procedures mentioned in this manual can be used but are not exclusively required to be utilized as other versions of the forms can be used on Client or Joint Venture project site, and/or through software application modules, as long as the intent of the requirements is met. When the form revisions change, the latest revision of the form should be utilized.

Our Safety Program will be used by various work parties in our operations, to ensure that all employees and/or subcontractor's health and safety are protected, through:

- **Planning** – detailed method for doing or achieving objectives and goals.
- **Information & Communication** – knowledge or perception of a situation with established GB workplace standards, legislative requirements, and/or Subcontractor safe work policies/procedures provided through information, training, instruction and supervision with active participation in OHS performance.
- **Monitoring** – determining the status of a system, a process or an activity of workplace conditions, compliance with standards or non-conformity through implemented Internal Responsibility System.
- **Evaluation & Follow-up** – action to eliminate the cause of non-conformity and to prevent recurrence as well as to ensure corrective actions for non-compliance taken and modification of workplace health & safety policies, procedures or programs applied for continual improvement to enhance performance and achieve a measurable result.

We are committed to the continual improvement of safety, health and environmental performance and the advancement of safety, health and environmental standards. Ours overall goal is to protect both people and the environment.

The GB recognizes that attaining the absolute goal of causing no harm to people or the environment with provision a safe work environment, and a work environment that promotes occupational health is extremely challenging and will work with clients, suppliers and the workforce towards achieving this goal.

GB management supports in full the Safety 360° initiative envisioning a culture where safety is a passion rather than a requirement. While most construction management firms focus on standards and policies, Safety 360° targets behavior and, in fact, our company's culture.

Every employee receives annual safety coaching from our dedicated Safety Department that includes role plays of scenarios tailored to specific work environments; lessons-learned discussions and new best practices; and leadership training so that every employee is engaged and becomes a voice for safety.

We expect continuous growth and innovation from our teams, which ranges from adopting new technology to testing cutting-edge emergency and safety measures.

We believe the Safety 360° initiative will further strengthen our safety culture and make a true difference to our staff, to the workforce and to our clients—everybody, everywhere, every day.

This behavior- based approach is designed to inspire our staff and encourage the workforce to become safety champions through a few key focus areas:

- **Awareness.** We foster a 360° view of safety physically and philosophically. We expect active engagement from each employee in his immediate environment, as well as awareness of activities above, below, and adjacent. It also means that we look out for one other's physical and mental safety, and that every employee and worker is empowered to speak up.
- **Shared Responsibility.** Each and every employee receives annual safety coaching. We believe that the best way to increase accountability is to increase responsibility, so superintendents and project managers are as engaged in safety as our dedicated Safety Department team members.
- **Behavior.** A key component of our approach is avoiding risky behaviors all together, as behavior is the primary contributing cause of over 80% of accidents. We are changing behaviors to support a strong safety culture that solicits feedback, engages our workforce and empowers people to make a difference.
- **Positivity.** Our coaching takes a preventative approach and is defined by positivity rather than enforcement and punishment.

## ACRONYMS

Various acronyms have been adapted within the Safety Program and noted accordingly within the procedural framework.

## AUDIT

GB through the internal and external safety program evaluation, auditing and maintenance continue support and follow systematic, independent and documented process for obtaining evidence and evaluating OHS performance objectively to determine the extent to which pre-determined criteria are fulfilled.

## COMMUNICATION

GB recognizes that good, consistent communication is vital component to our Safety and employee engagement may result in reduction of injuries and illnesses as well as improved performance.

Effective communication is essential to ensure employees understand policies, procedures, and the requirements to perform their job safely and to implement the Safety program fully.

In general GB utilizes verbal and written documented communication, though additional supportive communication methods may include, but not limited to:

- |   |  |
|---|--|
| • GB policy / procedure manuals and updates   | • GB orientation (induction) training  |
| • GB Safety Board, website/notice & reminders | • Regular Safety meetings  |
| • Employee / Supervisor Handbooks             | • Internal Electronic Filing System & Emails   |
| • Location /Project Site Orientation          | • Safety Talks, meetings, and refresher training   |
| • Subcontractor Safety Package                | • Health and safety committees and effective review and response to committee recommendation |

## PURPOSE

The purpose of this procedure is to provide procedural framework and practical guidance to ensure control over creation, approval, distribution, usage, update, retention and disposition of documents, records and documented information specified and determined by GB OHS Program in order to effectively implement, monitor and maintain active Occupational Health and Safety Management System (OHSMS) and assess conformance with business, corporate and legal requirements as well as compliance with applicable standards.

## SCOPE

This procedure is applied to all GB employees and all documented information within the scope of GB OHS Program / Occupational Health and Safety Management System (OHSMS) including the documents and records created by GB internally and/or the documentation and records of external origin.

This procedure does not apply to documents, records and documented information regarding the finance, accounting, general and legal affairs.

## DEFINITIONS

**OHS Program / Occupational Health and Safety Management System (OHSMS):** comprehensive and coordinated system of interrelated or interacting elements, procedures, processes and other measures that are implemented in order to promote continuous improvement in occupational health and safety (OHS).

**Policy (POL):** overall organization intentions and direction related to its OHS performance as formally expressed by senior management in relation to the implementation of the OHSMS.

**Procedure / program (PRO):** a documented, specified method to carry out an activity.

**Document:** medium containing information related to the OHS Program / Occupational Health and Safety Management System (OHSMS).

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

**Addendum (ADD):** additional documentation medium containing supplementary information related to the OHS Program / Occupational Health and Safety Management System (OHSMS) and integrated into controlled document system;

**Internal Reference Document (IRD):** document of internal origin developed entirely by or completed by the company that provides information or direction for the performance of activities within the scope of the OHS Program / Occupational Health and Safety Management System (OHSMS);

**External Reference Document (ERD):** document originating outside the company that provides information or direction for performing activities within the scope of the OHS Program / Occupational Health and Safety Management System (OHSMS).

**Form:** printed, typed, or electronic document with blank spaces for insertion of required or requested information

**Document/record control:** established framework and process to define controls needed to track, manage, and store document, records and documented information to ensure the effective planning, implementation, operation, evaluation and control OHS Program / Occupational Health and Safety Management System (OHSMS).

**Controlled Document:** any defined and specified document related to OHS Program / Occupational Health and Safety Management System (OHSMS) for which creation, revision, retention, distribution and status are required to be kept current for the effective planning, implementation and operation of OHS Program / Occupational Health and Safety Management System (OHSMS) with evaluation of control, corrective actions and conformance with the requirements and to ensure it remains legible, readily identifiable and authorised users have access to the most current version.

**Document Control Master List:** a consolidated master list with identified main elements within the scope of the OHS Program / Occupational Health and Safety Management System (OHSMS) indicating interaction and reference to related GB controlled documents with legible and readily identifiable current version status and retention cycle.

**Document Control Register:** active control list with indication of documentation versions tracking and managing changes with indication of documentation status and storage / archive within the scope of the OHS Program / Occupational Health and Safety Management System (OHSMS).

**Document Control Number:** the number assigned to a document within document and records management system for controlled document and which is always the next sequential number included in document control master list and legible and readily identifiable in actual control document.

**Uncontrolled Document:** document that is not a part of the GB document and records management system and may not be used to provide work direction or information necessary for the performance of work or copy of document whose content is no longer controlled in accordance with the GB document, records and documented information control procedure and protocols when uncontrolled documents may not be the latest version.

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## **ROLES AND RESPONSIBILITIES**

### **SENIOR MANAGEMENT**

- Ensuring the effective implementation of the document and records management system
- Ensuring that appropriate resources are provided for the management of documents and records
- Ensuring information, training and instruction is provided on the document and records management system
- Ensure the review and final approval of all GB document, records and documented information within the scope of the OHS Program / Occupational Health and Safety Management System (OHSMS) in timely manner
- Ensure document, records and documented information are reviewed, updated re-approve or approved / withdrawn prior to issue
- Ensure changes to and current versions status of document, records and documented information are identified and tracked
- Ensure document, records and documented information of external origin identified and determined for planning and operations of the OHS Program / Occupational Health and Safety Management System (OHSMS)
- Ensure measures and arrangements in place to prevent unintended use of obsolete document, records and documented information
- Ensure and exercise information and data protection arrangements to ensure that adequate confidentiality protection measures implemented within the scope of the OHS Program / Occupational Health and Safety Management System (OHSMS)

### **DOCUMENT CONTROLLER OR DESIGNEE**

- Managing the document control and records management process
- Checking the quality of documents to ensure documents and records remain legible and readily identifiable
- Ensuring documents are developed using correct styles and format
- Maintaining the document control master list within the scope of the OHS Program / Occupational Health and Safety Management System (OHSMS)
- Maintaining all relevant records within the scope of the OHS Program / Occupational Health and Safety Management System (OHSMS)
- Ensuring that only approved current versions of documents are released and available for use;
- Archiving of all obsolete documents and records
- Ensure and exercise measures and arrangements in place to prevent unintended use of obsolete document, records and documented information
- Ensure and exercise information and data protection arrangements to ensure that adequate confidentiality protection measures implemented within the scope of the OHS Program / Occupational Health and Safety Management System (OHSMS)

### **MANAGEMENT AND SUPERVISION**

- Maintain documents from the approved location and ensure relevant versions of applicable documents are readily available at the point of use
- Participating in creation and reviews of documents as required following established protocols and responding to document change requests in a timely manner
- Ensure new or updated documents are released and issued to relevant parties an available for use and reference
- Identify and withdraw obsolete documents and records if they are retained for any purpose to ensure any obsolete documents are withdrawn or removed from use and circulation to prevent unattended use
- Ensure that all affected personnel are trained, with written records of training, whenever a document is added or revised according to this procedure

### **WORKERS**

- Obtaining documents from the approved location;
- Not making copies (uncontrolled documents) of documents;
- Participating in reviews of documents as required.

## **PROCEDURE**

### **Document and records management system**

GB implemented the document and records management system based on the document version control concept and maintains Document Control Master List and Document Control Register with identification of all GB controlled documents within the scope of the OHS Program / Occupational Health and Safety Management System (OHSMS) in order to ensure the effective planning, implementation and operation of OHS program with evaluation of control, corrective actions and conformance with the requirements.

GB Senior Management at least annually or more often as required should review and validate company Document Control Master List with indication supporting documents needed to implement, monitor and maintain active OHS Program / Occupational Health and Safety Management System (OHSMS) effectively and assess conformance with business, corporate and legal requirements as well as compliance with applicable standards.

GB Senior Management shall ensure that new or revised finalized documentation determined in Document Control Master List is approved prior to issue and/or relevant versions of applicable documents reviewed, updated, re-approved or withdrawn as necessary with retention relevant tracking data in Document Control Register.

Once approved, the final controlled document version shall be released by the Document Controller via the Company intranet and internal email communication protocols, workplace safety board and safety meetings, company electronic server / filing system and communicating means to relevant personnel to allow implementation and to ensure that relevant versions of applicable documents are readily available at the point of use.

GB Senior Management shall ensure that documents of external origin that may be necessary for the planning implementation and operation of the OHS Program / Occupational Health and Safety Management System (OHSMS) identified in Document Control Master List and relevant versions of applicable documents are readily available at the point of use.

Document Controller or Designee will manage and maintain updated Document Control Master List determined by GB senior management to be necessary for the effectiveness of the OHS Program / Occupational Health and Safety Management System (OHSMS) to ensure documents and records remain legible and readily identifiable.

Document Controller or Designee shall coordinate and manage Document Control Register to ensure changes to, and current versions status of, documents are identified and tracked in order to prevent the unintended use of obsolete documents and identify such documents if they are retained for any purpose.

GB management and supervision shall ensure that new or updated approved and released documents are issued and communicated to relevant parties as well as available for use and ensure any obsolete documents are withdrawn or removed from use and circulation to prevent unattended use.

### **Document creation and update**

Identification and request the need for creation new or revise approved documents will be conducted through consultation with relevant work parties within the scope of the OHS Program / Occupational Health and Safety Management System (OHSMS) including but not limited through the Health & Safety Representatives (HSR) or established Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) and/or through management /staff meetings or toolbox meetings.

The requirements for review, updates, re-approve, and withdraw as well as for creation new or additional documents may be based on, but not limited to:

- Legislative requirements;
- Suggestions from Health & Safety Representatives (HSR) or Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC);
- System failures reported or identified during incident investigations;
- Internal or external audit findings;
- Outcomes of workplace inspections and monitoring;
- Industry or organizational best practice;
- Changes in business activities and or structure.

Evidence of consultation shall be documented through meeting minutes, memorandums or emails and records maintained. Feedback shall be reviewed and incorporated into draft documents, where relevant, and a final draft prepared by the Document Controller for approval by Senior Management.

Obsolete documents may be identified as part of the review or update process and shall be withdrawn and appropriately archived to prevent unintended use. Archived documents might be retained accessible for system evaluation and legal purposes.



**Document review**

All documentation that forms part of GB OHS Program / Occupational Health and Safety Management System (OHSMS) shall be formally reviewed in regular intervals in order to ensure it is still up to date and such reviews may be scheduled or unscheduled.

The review shall ensure that the following is considered:

- The continuing suitability and relevance of the documentation;
- The accuracy and clarity of the documentation;
- Compliance with current legislative requirements;
- The effectiveness of the document in achieving desired outcomes;
- Identified areas requiring improvement;
- The creating of any new documents and removal of obsolete documents; and
- The status / currency of any attachments / references included in the documents.

GB Senior Management at least annually or more often as required should review and validate company Document Control Master List with indication supporting documents needed to implement, monitor and maintain active OHS Program / Occupational Health and Safety Management System (OHSMS) effectively and assess conformance with business, corporate and legal requirements as well as compliance with applicable standards.

Document Controller or Designee shall coordinate and manage Document Control Register to ensure changes to, and current versions status of, documents are identified and tracked in order to prevent the unintended use of obsolete documents and identify such documents if they are retained for any purpose.

**Document identification and control**

All controlled documents created, issued, maintained, updated or disposed within the scope of the OHS Program / Occupational Health and Safety Management System (OHSMS) determined in Document Control Master List and tracked in Document Control Register shall be legible, readily identifiable, and retrievable by means of:

- title of document
- document control number
- version number
- date of issue
- reference to superseded document (if applicable)

Document Controller or Designee will manage and maintain updated Document Control Master List determined by GB senior management to be necessary for the effectiveness of the OHS Program / Occupational Health and Safety Management System (OHSMS).

Document Controller or Designee shall coordinate and manage Document Control Register to ensure changes to, and current versions status of, documents are identified and tracked in order to prevent the unintended use of obsolete documents and identify such documents if they are retained for any purpose.

External documents shall be maintained as the resources library in the centralized electronic filing system database and or on the company server and made available to all workers via the company intranet and internal email communication protocols, workplace safety board and safety meetings, company electronic server / filing system and communicating means to relevant personnel to allow implementation and reference access.

This may include:

- Legislation (Acts and Regulations);
- Approved Codes of Practice;
- Canadian Standards;
- Industry Codes & Guidelines;
- Any other external document referenced in the OHS Program / Occupational Health and Safety Management System (OHSMS).

**Obsolete documents**

Obsolete controlled documents are those which are no longer required, replaced or superseded as determined by the needs of the OHS Program / Occupational Health and Safety Management System (OHSMS).

Obsolete documents may be identified as part of the review or update process and shall be withdrawn and appropriately archived to prevent unintended use.

All documentation identified as obsolete shall be removed from points of issue by the Document Controller, archived electronically (if applicable) or in hard copy and retained for system evaluation purposes and legal requirements (where relevant).

Archived documents might be retained accessible for system evaluation and legal purposes with specific precautions when retained, obsolete or superseded controlled documents should be clearly marked or kept in a secure location, and the remaining copies should be destroyed.

Where document control is achieved by electronic means, special attention should be given to methods for identifying appropriate approval of electronic copies, access, security, distribution, media, backup, and archiving procedures.

**Records management & control**

The purpose of record management and control is to provide evidence of conformity requirements and of the effective operation of OHS Program / Occupational Health and Safety Management System (OHSMS) and to ensure that business activity records of evidential quality are created, managed and disposed of in accordance with legal requirements.

Records within the scope of the OHS Program / Occupational Health and Safety Management System (OHSMS) can include, but are not limited to, the following:

- Health and safety local action plans;
- Internal and external evaluation reports;
- Hazard registers and risk assessments;
- Corrective actions register(s);
- Workplace inspections;
- Training needs analysis and plans;
- Incident / Hazard reports;
- First Aid treatment;
- Licensing and certification;
- Registrations; Certification, records arising from legal requirements;
- Health & Safety Committee meeting minutes and recommendations;
- Training and induction checklists;
- Performance management plans;
- Emergency evacuation reports;
- Maintenance, inspections and testing;
- Health monitoring reports and testing;
- Research approvals / authorizations;
- Claims management and Rehabilitation case records.

GB will ensure that records within the scope of the OHS Program / Occupational Health and Safety Management System (OHSMS) prepared, safely stored, protected from unauthorized access, protected from alteration, and maintained by the company.

Records should be properly identified, collected, indexed filed, and be readily accessible. They may be stored and copied in any suitable form as hard copy or electronic media.

Copies of records should contain all relevant information from the original records.

**Records retention**

Document Controller or Designee will manage and maintain updated Document Control Master List determined by GB senior management to be necessary for the effectiveness of the OHS Program / Occupational Health and Safety Management System (OHSMS) including the records retention and disposal schedules.

GB business critical company emails or company emails received by and issued from the company shall be retained in the centralized electronic filing system database if they carry information or evidence that is required for legal or other purposes, (e.g., Issue and receipt of a report to stakeholders or regulatory bodies, and / or evidence of when a particular stakeholder or regulatory request was received).

It is unnecessary to retain emails records of a temporary nature.

**Records storage**

All controlled documents are to be stored within the appropriate document libraries in the centralized electronic filing system database and or on the company server and made available to all workers via the company intranet and internal email communication protocols, workplace safety board and safety meetings, company electronic server / filing system and communicating means to relevant personnel to allow implementation and reference access.

These files are stored on an electronic server system which is regularly backed up and archived.

Records may also include externally produced documentation, such as external consultancy reports, statutory compliance notices or safety data sheets used as part of a work health and safety activity.

Records generated may be in the form of hardcopy or electronic media.

Records must be stored in an orderly manner, be easily identifiable to facilitate their efficient and effective retrieval / replacement by any authorized person for purposes such as:

- Analysis / investigation;
- Internal / external evaluation;
- Evidence of legal compliance;
- Evaluation and review;
- Training needs.

#### **Protection of privacy and confidentiality**

GB is committed to treat information of employees, customers, stakeholders and other interested parties within the scope of the OHS Program / Occupational Health and Safety Management System (OHSMS) with the utmost care and confidentiality.

Confidential information within the scope of the OHS Program / Occupational Health and Safety Management System (OHSMS) can include, but not limited to:

- Unpublished financial information
- Data of Customers/Partners/Vendors
- Employees records
- Patents, formulas or new technologies
- Customer lists (existing and prospective)
- Data entrusted to our company by external parties
- Pricing/marketing and other undisclosed strategies
- Documents and processes explicitly marked as confidential
- Unpublished goals, forecasts and initiatives marked as confidential

GB committed to exercise information and data protection arrangements to ensure that adequate confidentiality protection measures implemented within the scope of the OHS Program / Occupational Health and Safety Management System (OHSMS) which might include but not limited:

- Store, secure and lock paper documents
- Encrypt electronic information and safeguard databases
- Request employees to sign non-compete and/or non-disclosure agreements (NDAs)
- Request for authorization by senior management to allow employees to access certain confidential information
- Restrict and monitor authorized access to sensitive / confidential data
- Build secure networks to protect online data from cyberattacks
- Establish clear procedures for reporting privacy breaches or data misuse
- Establish data protection guidelines for document shredding, secure locking, data encryption, frequent backups and permanently deleting electronic records

As part of operations and activities within the scope of the OHS Program / Occupational Health and Safety Management System (OHSMS) GB might need to obtain and process information, documents and records including but not limited any offline or online data that makes a person identifiable such as names, addresses, usernames and passwords, digital footprints, photographs, social security numbers, financial data etc.

GB will ensure the compliance with applicable personal privacy laws in the collection, use, sharing, and disposition of information within the scope of the OHS Program / Occupational Health and Safety Management System (OHSMS) when information, documents, data and records be gathered, stored and handled fairly, transparently and with respect towards individual rights.

GB will ensure that such information, documents and records collected in a transparent way and only with the full cooperation and knowledge of interested parties. Once such information and data become available to GB, the following rules apply and documents, records and data will be:

- Accurate and kept up-to-date
- Collected fairly and for lawful purposes only
- Processed by the company within its legal and moral boundaries
- Protected against any unauthorized or illegal access by internal or external parties and from misuse, disclosure and tampering

The collection of personal information will be limited to that which is necessary for the purposes identified within the scope of the OHS Program / Occupational Health and Safety Management System (OHSMS) and information will be collected by fair and lawful means.

Personal information will not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law.

Personal information will be retained only as long as necessary for the fulfilment of those purposes.

Whenever possible, access to personal information will be limited to authorized users only. Personal information may only be used within the limits of each staff and volunteer role. Staff and volunteers may not read, look at, receive or otherwise use personal information unless they have a legitimate "need to know" as part of their position.

GB will use appropriate security safeguards depending on the sensitivity of the information to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification, regardless of the format in which it is held. Safeguards will include: physical safeguards (such as locked filing cabinets and rooms); organizational safeguards (such as permitting access to personal health information by staff on a "need-to-know" basis only); and technological safeguards (such as the use of passwords, encryption, and audits).

### **Exceptions**

Confidential information may occasionally have to be disclosed for legitimate reasons. Examples are:

- If a regulatory body request it as part of an investigation or audit
- If company examines a venture or partnership that requires disclosing some information within legal boundaries

Appropriate internal authorizations must be obtained prior to disclosure. Personal information should not be disclosed for general speculation or fact-finding and should only be disclosed for a specific law enforcement matter.

### **Disciplinary Consequences**

GB reserves the right to apply disciplinary measures on employees who don't respect company confidentiality procedure and arrangements who might face disciplinary and, possibly, legal action.

GB reserves the right to investigate every breach of company confidentiality procedure and to terminate any employee who wilfully or regularly breaches company confidentiality safeguards and arrangements for personal profit or who repeatedly disregard this procedure.

## **COMMUNICATION**

- This procedure will be communicated to all new hired employees through new employee general orientation or site-specific induction and/ or through periodic management and staff safety meetings or toolbox talk meetings.
- The procedure will be communicated to all existing employees through the OHS Program / Occupational Health and Safety Management System (OHSMS) orientation and /or through Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) communication and periodic management and staff safety meetings as well as through periodic and ongoing safety training, internal communication protocols or structured training sessions.

## **TRAINING**

- All new employees will receive awareness training as part of new employee general orientation or site-specific induction on their specific health and safety roles and responsibilities through the new hire orientation process.
- All existing employees will receive training on their health and safety roles and responsibilities through periodic staff OHS Program / Occupational Health and Safety Management System (OHSMS) orientation safety meetings as well as through periodic and ongoing safety training or structured training sessions.
- Verification of training will be confirmed via sign off and may include knowledge verification testing.

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## **EVALUATION**

This procedure will be reviewed on annual basis by Senior Management and /or during the annual OHS Program / Occupational Health and Safety Management System (OHSMS) internal audit and maybe changed due to business needs, any legal requirements and based on the results of the evaluation to ensure it continues to meet OHS regulation and standards and to ensure it is relevant with current operations and any changes will be indicated in the meetings minutes or reflected on the revision page.

The Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) and management will also be involved with the evaluation by analyzing forwarded items of concern and suggesting corrective action.

On a yearly basis, management will review OHS Program / Occupational Health and Safety Management System (OHSMS) to assess whether it is still compliant with current regulations and with the current work environment. If necessary and if required procedure will be amended to reflect the current operation.

After the year-end audit a thorough analysis of the gaps identified will be conducted by the Internal Auditor & Senior Management will develop an action plan that addresses the deficiencies with an overall goal of continual improvement.

Senior Management at least annually or more often as required should review and validate company Document Control Master List with indication supporting documents needed to implement, monitor and maintain active OHS Program / Occupational Health and Safety Management System (OHSMS) effectively and assess conformance with business, corporate and legal requirements as well as compliance with applicable standards.

Document Controller or Designee will coordinate and manage Document Control Register to ensure changes to, and current versions status of, documents are identified and tracked in order to prevent the unintended use of obsolete documents and identify such documents if they are retained for any purpose.

## **REFERENCES**

Occupational Health and Safety Act R.S.O. 1990

OHS Program / Occupational Health and Safety Management System (OHSMS)

Document Control Master List

Document Control Register

## HEALTH AND SAFETY POLICY STATEMENT

At Govan Brown Associates Limited, we are fully committed to ensuring the health, safety, and well-being of our workforce, employees, the public, and all individuals within our work sites. This commitment encompasses safeguarding against physical injury, psychological harm, occupational illnesses, and losses. Through close collaboration with our workers, we continuously develop, implement, monitor, and enhance our Health and Safety Program.

We, the senior management of Govan Brown Associates Limited, recognize and uphold the fundamental right of our workers to perform work in a safe and healthy environment. Therefore, we are dedicated to fostering such an environment that promotes occupational health and safety. Both senior and middle management are committed to providing a safe and healthy work environment, sharing the responsibility of minimizing risks associated with employee health and safety, and preventing workplace injury, occupational illness, and loss. This includes establishing Occupational Health and Safety (OHS) objectives and diligently monitoring their achievement to drive ongoing improvements in the Health and Safety Program and overall OHS performance.

Middle management and supervisors are accountable for ensuring the health and safety of workers under their supervision. Their responsibilities include overseeing work processes, machinery and equipment safety, enforcement of established safe work practices and procedures, and providing necessary support and arrangements to achieve OHS objectives and continual improvement efforts. Adequate training is provided to equip workers with the necessary skills to maintain their health and safety while performing tasks.

Each employee is obliged to prioritize the safety and well-being of themselves and their colleagues by familiarizing themselves with workplace hazards and adhering to relevant OHS legal statutes, government regulations, and established safe work practices. Furthermore, employees are encouraged to actively participate in activities aimed at achieving set OHS objectives and supporting our Health and Safety Program, ensuring continual improvement in program effectiveness and OHS performance.

All subcontractors and visitors to our premises are held to the same high standards of responsibility for health and safety as our employees. They are required to conduct operations in compliance with legal requirements, employing best practices, and adhering to the established health and safety program policies and procedures of Govan Brown Associates Limited.

It is imperative that health and safety are prioritized in every undertaking across all levels of our organization. Further details regarding health and safety accountabilities and responsibilities can be found in Element One of the Duties, Roles, and Responsibilities subsection, as well as throughout the Health and Safety Manual.

Senior management at Govan Brown Associates Limited is fully committed to fostering a culture of consultation and cooperation with our workforce. We pledge to collaborate closely with workers and relevant personnel in the development and implementation of our Health and Safety Program, ensuring its effectiveness, alignment with organizational needs, and compliance with legal requirements.

As an employer, Govan Brown Associates Limited acknowledges its paramount responsibility for the health and safety of its workers. We fully recognize and uphold the fundamental right of every worker to operate in a safe and healthy workplace environment.

In my capacity as the President of Govan Brown Associates Limited, I personally pledge to fulfill my duties under the Occupational Health and Safety Act and comply with applicable OHS legal requirements. I am committed to taking every reasonable precaution necessary to ensure the protection of workers in the workplace. This commitment underscores our unwavering dedication to maintaining a healthy, safe, and secure work environment for all individuals within our organization.



March 22/24

Colin Gray

Date

President – Govan Brown Associates Limited

## HEALTH AND SAFETY POLICY ADMINISTRATION

### PURPOSE

The Occupational Health & Safety Policy is a statement of intent and includes the principles, philosophies and requirements of Govan Brown, as a minimum will address the following:

- Basic objectives of the Program
- Current philosophy toward health and safety
- Responsibility of all employees
- Intolerance for unacceptable health and safety performance
- Laws as minimum standards
- Frequency of review

### SCOPE

All workplace parties, including suppliers and subcontractors must regard the Health & Safety Policy as a directive for compliance with the Health and Safety Program.

## ROLES AND RESPONSIBILITIES

### SENIOR MANAGEMENT

- Prepare written Health and Safety Policy and ensure it is reviewed at least annually and signed as per the Occupational Health and Safety Act.
- Develop a program to implement the health and safety policy. Ensure it is known throughout the organization. Promote an active and engaged safety culture and ensure training is in place to make the program work.
- Provide leadership, motivation, and resources necessary to make the program work and create a positive workplace safety culture.
- Communicate and distribute Health and Safety Policy and program to work parties.

#### ***Specific to Province of Alberta:***

- Ensure the health, safety, and welfare of workers engaged in the work of that employer; those workers not engaged in the work of that employer but present at the work site at which that work is being carried out; and other persons at or in the vicinity of the work site whose health and safety may be materially affected by identifiable or controllable hazards originating from the work sites.
- Ensure that all workers engaged in the work of that employer are aware of the rights and responsibilities under the Act, regulations, and OHS Code.
- Ensure that none of the employer's workers are subjected to or participate in harassment or violence at the work site.
- Ensure that workers are supervised by a person who is competent, and is familiar with the Act, regulations, and OHS Code that apply to the work performed at the work site.
- Ensure that the Joint Health and Safety committee/, or health and safety representative, complies with all requirements imposed on the JHSC/JOHSC or health and safety representative under the OHS Act, Regulation and Code.
- Ensure that health and safety concerns raised by workers, supervisors or the JHSC/JOHSC, or health and safety representative are resolved in a timely manner.
- Ensure that all workers engaged in the work of the employer are adequately trained in all matters necessary to perform their work in a healthy and safe manner.
- Ensure that work to be done that may endanger a worker is done by a worker who is competent to the work or by a worker who is working under the direct supervision of a worker who is competent to do the work.
- Keep readily available information related to work site hazards, controls, work practices and procedures, and provide that information to the JHSC/JOHSC or health and safety representative, the workers, and the prime contractor if there is one.
- Ensure a current paper or electronic copy of the OHS Act, Regulations, and Code are readily available for reference by workers, the JHSC/JOHSC and the health and safety representative.
- Ensure that every employer who is a self-employed person engaged in an occupation but is not in the service of an employer for that occupation shall comply with all requirements imposed on an employer, with necessary modifications.
- Ensure every employer shall cooperate with any person exercising a duty imposed by the OHS Act, Regulation and Code.

- Ensure that health and safety concerns raised by workers, supervisors or the JHSC/JOHSC, or health and safety representative are resolved in a timely manner.
- Ensure that all workers engaged in the work of the employer are adequately trained in all matters necessary to perform their work in a healthy and safe manner.
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- Keep readily available information related to work site hazards, controls, work practices and procedures, and provide that information to the JHSC/JOHSC or health and safety representative, the workers, and the prime contractor if there is one.
- Ensure a current paper or electronic copy of the OHS Act, Regulations, and Code are readily available for reference by workers, the JHSC/JOHSC and the health and safety representative.
- Ensure that every employer who is a self-employed person engaged in an occupation but is not in the service of an employer for that occupation shall comply with all requirements imposed on an employer, with necessary modifications.
- Ensure every employer shall cooperate with any person exercising a duty imposed by the OHS Act, Regulation and Code.

**MANAGEMENT**

- Implement, support, and enforce Health and Safety Policy and program.
- Be accountable for the health and safety of workers under their supervision and be aware of applicable legislation and ensure compliance.
- Provide primary corporate responsibility for workplace accident prevention implementation.
- Work in cooperation with others in determining safe practices, enforcing their observance, developing procedures for dealing with violations and general safety and incident prevention.
- Enforce all established safety regulations as well as work methods and take corrective action as necessary to ensure compliance with the rules.
- Provide workers with health and safety information, training, instruction, and supervision.
- Ensure there is an effective mechanism for communication and for co-operative problem solving among workers and supervisors.

***Specific to Province of Alberta:***

- Ensure the health, safety, and welfare of workers engaged in the work of that employer; those workers not engaged in the work of that employer but present at the work site at which that work is being carried out; and other persons at or in the vicinity of the work site whose health and safety may be materially affected by identifiable or controllable hazards originating from the work sites.
- Ensure that all workers engaged in the work of that employer are aware of the rights and responsibilities under the Act, regulations, and OHS Code.
- Ensure that none of the employer's workers are subjected to or participate in harassment or violence at the work site.
- Ensure that workers are supervised by a person who is competent, and is familiar with the Act, regulations, and OHS Code that apply to the work performed at the work site.
- Ensure that the Joint Health and Safety committee, or health and safety representative, complies with all requirements imposed on the JHSC/JOHSC or health and safety representative under the OHS Act, Regulation and Code.

**SUPERVISORS**

- Being familiar with the Occupational Health and Safety Act (OHSA) and regulations, health and safety policies, programs and procedures as applicable to the workplace under their control.
- Ensure that workers comply with the Occupational Health and Safety Act, applicable regulations, and the company's policy and program to carry out safe and healthy work.
- Implement, support, and enforce Health and Safety Policy and program at crew level and instruct personnel in proper work practices and update this instruction before work begins and when unsafe behavior is observed as needed.
- Monitor the compliance with these requirements and workers who do not follow the policies, programs, and procedures are coached and or disciplined.



- Provide orientation for new crew members and verify that they have received adequate training before assigning them work.
- Promote a workplace climate where workers can raise safety concerns and know that their concerns will be taken seriously.
- Take all precautions necessary to protect the health and safety of every work under the supervisor's supervision.
- Ensure a worker under the supervisor's supervision work in the manner and in accordance with the requirements of the OHS Act, Regulation, and Code.
- Ensure that none of the workers under the supervisor's supervision are subject to or participate in harassment or violence at the work site.
- Advise every worker under their supervision of all known or reasonably foreseeable hazards to health and safety in the are where the worker is performing work.
- Report to the employer a concern about an unsafe or harmful work site act that occurs or has occurred or an unsafe or harmful work site condition that exists or has existed.
- Cooperate with any person exercising a duty imposed by the OHS Act, Regulation, or Code.

**WORKERS**

- Aware, understand, acknowledge and follow Health and Safety Policy and program fulfilling their responsibilities under the Policy, program and Occupational Health and Safety Act.
- Know the location and arrangements for Health and Safety Policy and program resources and utilize them as required.
- Comply with and work safely in accordance with the company's or the client's health and safety policy and program, and with the Occupational Health and Safety Act and applicable regulations.
- Report hazards or unsafe conditions as well as all accidents, injuries, and near-misses immediately to the supervisor.
- Participate in required/ assigned training and provide recommendations to the supervisor to improve workplace health and safety. and to assist in the reduction and controlling of incident and illness producing conditions.
- Use the correct tools and equipment as well as and personal protective equipment for the job and keep tools, equipment and personal protective equipment in good condition or replace when necessary.
- Develop a personal concern for health and safety and suggest ways to eliminate hazards or control risk.
- Read, understand, and comply with workplace health and safety policy, safe work practices and procedures.
- Co-operate with management, supervision, Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC).

***Specific to Province of Alberta:***

- Co-operate with management, supervision, Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC)/Joint Occupational Health and Safety Committee (JOHSC), as well as any person exercising a duty imposed by the OHS Act, Regulation, and Code.
- Take reasonable care to protect the health and safety of the worker and of other persons at or in the vicinity of the work site while the worker is working
- Cooperate with the worker's supervisor or employer or any other person for the purposes of protecting the health and safety of the worker, other workers engaged in the work of that employer, and other workers not engaged in the work of that employer but present at the work site at which that work is being carried out
- When the nature of the work requires, at all times, use all devices and wear all PPE designated and provided for the worker's protection by the workers employer or required to be used or worn by the worker by the OHS Act, Regulation, or Code
- Refrain from causing or participating in harassment or violence
- Report to the employer or supervisor a concern about an unsafe or harmful work site act that occurs or has occurred o ran unsafe or harmful work site condition that exists or has existed
- Participate in any training provided by the employer
- A worker who is not competent to perform work that may endanger the worker or others shall not perform the work except under the direct supervision of a worker who is competent to perform the work.

## PROCEDURE

Senior Management, or designate shall develop a policy statement that clearly demonstrates:

- senior management's commitment to the establishment and promotion of a healthy and safe workplace and to the integration of health and safety into all workplace activities;
- the commitment to comply with applicable Occupational Health and Safety legal requirements and other requirements with the intention to treat applicable health and safety legislation as a minimum standard rather than maximum;
- responsibility of appropriate personnel in maintaining a healthy and safe workplace and to protect the well-being of all persons in the workplace;
- accountability of all levels of management for carrying out health and safety responsibilities;
- importance of consultation and co-operation between management and employees for effective implementation of policy and any related programs;
- commitment to continual improvement by conducting regular reviews of the policy;
- commitment to monitor the policy's effectiveness by having a method for setting and reviewing Occupational Health and Safety objectives and targets;
- that the policy will be documented, posted, and communicated internally as well as externally, as appropriate;

The current Govan Brown Health and Safety Policy Statement shall be posted on / included:

- Safety Boards, Employee Handbooks, Site Orientation and Subcontractor Contract Package
- Any revisions will be through safety talks, email, or paystubs along with updates in Govan Brown Health and Safety Program Manual
- Each employee, on beginning employment, will be given a copy of the policy and informed that it is a condition of employment to follow the policy

Senior Management shall ensure training is provided to employees on the policy statement to ensure that management and workers:

- Understand the objectives of the H&S Policy Statement
- Understand their responsibilities under the H&S Policy Statement
- Can explain what it means to them
- Know where to find a copy of the current H&S Policy Statement

The H&S Policy Statement will be signed and dated by the President and organization chart will be created to demonstrate that the signatory of the policy is in fact the President.

Senior Management will ensure that the current H&S Policy Statement is posted at the head office and made readily available at all active work locations.

The Occupational Health and Safety Act (OHSA), and other applicable regulations that apply to our operations, are the minimum requirements for health and safety.

The Internal Responsibility System (IRS) is the premise behind the OHSA. This self-governance for health and safety is created by an overlapping set of responsibilities and duties for all workplace parties.

## COMMUNICATION

- The Health and Safety Policy and procedure will be communicated to all new hired employees through new employee general orientation or site-specific induction and/ or through periodic management and staff safety meetings or toolbox talk meetings.
- The Health and Safety Policy and procedure will be communicated to all existing employees through the OHS Program / Occupational Health and Safety Management System (OHSMS) orientation and /or through Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) communication and periodic management and staff safety meetings as well as through periodic and ongoing safety training, internal communication protocols or structured training sessions.
- The Health and Safety Policy statement will be posted on all Govan Brown' health and safety communication boards.

## **TRAINING**

- All new employees will receive awareness training as part of new employee general orientation or site-specific induction on their specific health and safety roles and responsibilities through the new hire orientation process.
- All existing employees will receive training on their health and safety roles and responsibilities through periodic staff OHS Program / Occupational Health and Safety Management System (OHSMS) orientation safety meetings as well as through periodic and ongoing safety training or structured training sessions.
- Verification of training will be confirmed via sign off and may include knowledge verification testing

## **EVALUATION**

- The Health and Safety Policy and procedure will be reviewed on annual basis by Senior Management and /or during the annual OHS Program / Occupational Health and Safety Management System (OHSMS) internal audit and maybe changed due to business needs, any legal requirements and based on the results of the evaluation to ensure it continues to meet OHS regulation and standards and to ensure it is relevant with current operations and any changes will be indicated in the meetings minutes or reflected on the revision page.
- The Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) and management will also be involved with the evaluation by analyzing forwarded items of concern and suggesting corrective action.
- On a yearly basis, management will review OHS Program / Occupational Health and Safety Management System (OHSMS) to assess whether it is still compliant with current regulations and with the current work environment. If necessary and if required procedure will be amended to reflect the current operation.
- After the year-end audit a thorough analysis of the gaps identified will be conducted by the Internal Auditor & Senior Management will develop an action plan that addresses the deficiencies with an overall goal of continual improvement.
- Senior Management at least annually or more often as required should review and validate company Document Control Master List with indication supporting documents needed to implement, monitor and maintain active OHS Program / Occupational Health and Safety Management System (OHSMS) effectively and assess conformance with business, corporate and legal requirements as well as compliance with applicable standards.
- Document Controller or Designee will coordinate and manage Document Control Register to ensure changes to, and current versions status of, documents are identified and tracked in order to prevent the unintended use of obsolete documents and identify such documents if they are retained for any purpose.

## **REFERENCES**

Occupational Health and Safety Act R.S.O. 1990

OHS Program / Occupational Health and Safety Management System (OHSMS)

Health and Safety Policy Statement

Document Control Master List

Document Control Register

## DUTIES, ROLES AND RESPONSIBILITIES

### PURPOSE

Outline and facilitate a strong Internal Responsibility System (IRS) in the workplace within an organization, where everyone has direct responsibility for health and safety as an essential part of his/ her job, which is the premise behind the Occupational Health and Safety Act (OHSA).

### SCOPE

The following responsibilities apply to all workplace parties of the company. It also applies to, but not limited to: visitors, clients, contractors, vendors or members of the public.

### DEFINITIONS

**Project Owner / Constructor:** means 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. The constructor is the party with the greatest degree of control over health and safety at the entire project and is ultimately responsible for the health and safety of all workers. The constructor must ensure that all the employers and workers on the project comply with the Act and its regulations.

**Employer:** a person (or company) 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;

**Senior management:** executives at the highest level of an organization with responsibility for corporate governance, corporate strategy and the interests of all the organization's stakeholders;

**Middle Management:** 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.

**Supervisor:** a competent person who administers and/or supervises the affairs of a department or division at the level below senior management of the company or organization and who is in charge of a workplace or has authority over a worker(s) during their day-to-day work.

**Worker:** (Employee, Co-op Students) is defined as a competent individual, who performs work or supplies services for a monetary/non-monetary compensation. Workers do not have management or supervisor responsibilities.

This means 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;

**Competent person** (according to OHSA) means a person who (a) is qualified because of their knowledge, training and experience to organize the work and its performance; (b) is familiar with the provisions of this Act and the regulations that apply to the work, and (c) has knowledge of any potential or actual danger to health and safety in the workplace

**Health and Safety Representative (HSR)** means a health and safety representative elected or selected by the workers under the Occupational Health and Safety Act (OHSA)

**Joint Health and Safety Committee (JHSC)/Joint Occupational Health and Safety Committee (JOHSC)** is advisory group and forum for bringing the internal responsibility system into practice. The committee is made up of management and worker representatives who meet on a regular basis and work together to identify workplace health and safety problems, provide recommended solutions and further assist in dealing with workplace health and safety issues and improving workplace health and safety conditions.

**Contractor** means any worker or group of workers who perform work at the project or on Govan Brown premises for which Govan Brown compensate the worker or group of workers and are not compensated for that work through Govan Brown organization's payroll in accordance with agreed upon specification, terms and conditions.

**Subcontractor** means a person who takes a portion of a contract from the principal contractor or from another sub-contractor.

**Visitor** means a person occasionally visiting a person or workplace and not regular employee of the Govan Brown company;

**First Aid Attendant** means a competent person who has undertaken training and has the valid qualification (first-aid certificate) to give first aid;

**EMPLOYER**

**Duties of Employers (OHSA s.25)**

- 1) An employer shall ensure that,
  - a) the equipment, materials and protective devices as prescribed are provided;
  - b) the equipment, materials and protective devices provided by the employer are maintained in good condition;
  - c) the measures and procedures prescribed are carried out in the workplace;
  - d) the equipment, materials and protective devices provided by the employer are used as prescribed; and
  - e) a building, structure, or any part thereof, or any other part of a workplace, whether temporary or permanent, is capable of supporting any loads that may be applied to it,
    - (i) as determined by the applicable design requirements established under the version of the Building Code that was in force at the time of its construction,
    - (ii) in accordance with such other requirements as may be prescribed, or
    - (iii) in accordance with good engineering practice, if subclauses (i) and (ii) do not apply.
- 2) Without limiting the strict duty imposed by subsection (1), an employer shall,
  - a) provide information, instruction and supervision to a worker to protect the health or safety of the worker;
  - b) in a medical emergency for the purpose of diagnosis or treatment, provide, upon request, information in the possession of the employer, including confidential business information, to a legally qualified medical practitioner and to such other persons as may be prescribed;
  - c) when appointing a supervisor, appoint a competent person;
  - d) acquaint a worker or a person in authority over a worker with any hazard in the work and in the handling, storage, use, disposal and transport of any article, device, equipment or a biological, chemical or physical agent;
  - e) afford assistance and co-operation to a committee and a health and safety representative in the carrying out by the committee and the health and safety representative of any of their functions;
  - f) only employ in or about a workplace a person over such age as may be prescribed;
  - g) not knowingly permit a person who is under such age as may be prescribed to be in or about a workplace;
  - h) take every precaution reasonable in the circumstances for the protection of a worker;
  - i) post, in the workplace, a copy of this Act and any explanatory material prepared by the Ministry, both in English and the majority language of the workplace, outlining the rights, responsibilities and duties of workers;
  - j) prepare and review at least annually a written occupational health and safety policy and develop and maintain a program to implement that policy;
  - k) post at a conspicuous location in the workplace a copy of the occupational health and safety policy;
  - l) provide to the committee or to a health and safety representative the results of a report respecting occupational health and safety that is in the employer's possession and, if that report is in writing, a copy of the portions of the report that concern occupational health and safety; and
  - m) advise workers of the results of a report referred to in clause (l) and, if the report is in writing, make available to them on request copies of the portions of the report that concern occupational health and safety.
  - n) notify a Director if a committee or a health and safety representative, if any, has identified potential structural inadequacies of a building, structure, or any part thereof, or any other part of a workplace, whether temporary or permanent, as a source of danger or hazard to workers.
- 3) For the purposes of clause (2) (c), an employer may appoint himself or herself as a supervisor where the employer is a competent person.

(3.1) Any explanatory material referred to under clause (2) (i) may be published as part of the poster required under section 2 of the Employment Standards Act, 2000.

4) Clause (2) (j) does not apply with respect to a workplace at which five or fewer workers are regularly employed.

5) Clause (2) (n) does not apply to an employer that owns the workplace.

#### **Additional Duties of Employers (OHS s.26)**

- 1) In addition to the duties imposed by section 25, an employer shall,
  - a) establish an occupational health service for workers as prescribed;
  - b) where an occupational health service is established as prescribed, maintain the same according to the standards prescribed;
  - c) keep and maintain accurate records of the handling, storage, use and disposal of biological, chemical or physical agents as prescribed;
  - d) accurately keep and maintain and make available to the worker affected such records of the exposure of a worker to biological, chemical or physical agents as may be prescribed;
  - e) notify a Director of the use or introduction into a workplace of such biological, chemical or physical agents as may be prescribed;
  - f) monitor at such time or times or at such interval or intervals the levels of biological, chemical or physical agents in a workplace and keep and post accurate records thereof as prescribed;
  - g) comply with a standard limiting the exposure of a worker to biological, chemical or physical agents as prescribed;
  - h) establish a medical surveillance program for the benefit of workers as prescribed;
  - i) provide for safety-related medical examinations and tests for workers as prescribed;
  - j) where so prescribed, only permit a worker to work or be in a workplace who has undergone such medical examinations, tests or x-rays as prescribed and who is found to be physically fit to do the work in the workplace;
  - k) where so prescribed, provide a worker with written instructions as to the measures and procedures to be taken for the protection of a worker; and
  - l) carry out such training programs for workers, supervisors and committee members as may be prescribed.

#### **SENIOR MANAGEMENT**

Senior Management shall:

- Prepare, at least annually review and post in a conspicuous place a written Health and Safety policy and develop/maintain a prevention program to fulfill that policy;
- Provide adequate resources for implementing, maintaining, and improving the H&S program;
- Take overall responsibility and accountability for the protection of everyone's health and safety in the workplace;
- Ensure workers and worker representatives are consulted and can actively participate in developing and maintaining the H&S program;
- Afford assistance and co-operation to the Health and Safety representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) in carrying out any of their functions;
- Define roles and responsibilities, establish accountability, and delegate authority for implementing the program;
- Include H&S activities and initiatives in the overall business plans and make health and safety part of the business culture of organization;
- Ensure that everyone who works in their workplace has the time, training and support to participate in the health and safety program;
- Appoint competent management representatives (managers and supervisors) with defined roles, authority, and responsibility, including responsibilities for the H&S program;
- 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;
- Make sure supervisors and workers are aware and or informed of potential or actual hazards;
- Support the process of ongoing hazard assessment;

- Participate in the development and review of practices and procedures;
- Promote the exchange of health and safety information;
- Ensure an investigation and reporting is conducted for workplace accidents and incidents as prescribed by OHSA;
- Review accident reports and respond in a timely manner;
- Conduct a formal inspection of a site at least once a year;
- Take every precaution reasonable in the circumstances for the protection of a worker.

### **MIDDLE MANAGEMENT**

In addition to health and safety responsibilities outlined in Section 27 of the Occupational Health and Safety Act management must:

- Be familiar with the provisions of the Occupational Health and Safety Act and regulations and Govan Brown health and safety policies, programs and procedures as they apply to the workplace under their control;
- Be knowledgeable about potential or actual danger to health and safety in the workplace and advise workers about these hazards;
- Ensure that a worker works in compliance with the Occupational Health and Safety Act and regulations by following safe workplace procedures and by ensuring any personal protective equipment, protective devices and/or clothing required to be used or worn by a worker are properly used and maintained;
- Provide a worker, where prescribed, with written instructions outlining the measures and procedures to be followed for the worker's protection. Annually review and update written instructions as required;
- Provide a worker with instruction and training to protect the health and safety of the worker. Quarterly review, updating records and scheduling of required training for employees;
- Complete the new employee orientation checklist and all required training before performing a task;
- Conduct safety meetings/chats with their staff on regular basis;
- Take every precaution reasonable in the circumstances for the protection of a worker;
- Ensure worker compliance with the health and safety policy and program and use all power, up to and including the discipline policy, to ensure adherence;
- 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 legislations and ensure compliance;
- Support the process of ongoing hazard assessment;
- Participate in the development and review of 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 Health and Safety representative (HSR) / Joint Health and Safety Committee (JHSC) / Joint Occupational Health and Safety Committee (JOHSC) recommendations;
- Ensure practices and procedures are established so that supervisors can maintain a safe and healthy workplace;
- Participate in the development, implementation and review of the program;
- Ensure corrective actions are implemented and effective as outcomes from accident/incident investigation reports;
- Conduct a formal inspection of the workplace as required;
- Report regularly to senior management on the status of health and safety performance.
- Monitor departments and projects and hold them accountable for their individual health and safety performance.

**SUPERVISORS****Duties of Supervisors (OHSA s. 27)**

- 1) A supervisor shall ensure that a worker,
  - a) works in the manner and with the protective devices, measures and procedures required by this Act and the regulations; and
  - b) uses or wears the equipment, protective devices or clothing that the worker's employer requires to be used or worn.
- 2) Without limiting the duty imposed by subsection (1), a supervisor shall,
  - a) advise a worker of the existence of any potential or actual danger to the health or safety of the worker of which the supervisor is aware;
  - b) where so prescribed, provide a worker with written instructions as to the measures and procedures to be taken for protection of the worker; and
  - c) take every precaution reasonable in the circumstances for the protection of a worker.

**All supervisors shall:**

- Enforce all health and safety rules, safe work practices and procedures with workers under their direct supervision and maintain responsibility for on-site accident prevention.
- Conduct workplace inspections and encourage the reporting of hazards.
- Provide workers with the necessary information and training to work safely with the identified hazards.
- Monitor the health and safety performance of their workers and subcontractors, while providing adequate supervision to any visitors.
- Perform the initial investigation of incidents and accidents. Document findings and report to management as required by the program and regulations.
- Aid in accident investigations and take actions to prevent reoccurrence.
- Obtain and submit all training and safety documentation to the constructor or Ministry of Labour, Training and Skills Development (MLTSD) promptly and maintain on-site documents and materials as required.
- Provide and enforce corrective actions for violations of the company's safety policies or procedures.
- Consult and co-operate with the Health and Safety Representative where appropriate.

**WORKERS****Duties of Workers (OHSA s.28)**

- 1) A worker shall,
  - a) work in compliance with the provisions of this Act and the regulations;
  - b) use or wear the equipment, protective devices or clothing that the worker's employer requires to be used or worn;
  - c) report to his or her employer or supervisor the absence of or defect in any equipment or protective device of which the worker is aware and which may endanger himself, herself or another worker; and
  - d) report to his or her employer or supervisor any contravention of this Act or the regulations or the existence of any hazard of which he or she knows.
- 2) No worker shall,
  - a) remove or make ineffective any protective device required by the regulations or by his or her employer, without providing an adequate temporary protective device and when the need for removing or making ineffective the protective device has ceased, the protective device shall be replaced immediately;
  - b) use or operate any equipment, machine, device or thing or work in a manner that may endanger himself, herself or any other worker; or
  - c) engage in any prank, contest, feat of strength, unnecessary running or rough and boisterous conduct.

In addition to health and safety responsibilities outlined in Section 28 of the Occupational Health and Safety Act workers shall:

- Maintain an acceptable mental and physical health and attitude for optimum work performance;
- Read, understand, and comply with workplace health and safety policy, company rules, safe work practices and safe job procedures;
- Carry out work in a manner so as not to create a health and safety hazard to themselves or others;



- Participate in education and training;
- Assist in the reduction and controlling of incident and illness producing conditions;
- Complete pre-use inspections for equipment as required;
- Do not remove, displace or interfere with the use of any safeguards;
- Report any incidents, near misses, injuries, or illnesses to manager / supervisor immediately;
- Use the correct tools and equipment for the job;
- Keep workplace clean and safe, tools and personal protective equipment in good condition or replace when necessary;
- Use the required safety equipment and personal protective equipment;
- Report defects in workplace equipment to manager / supervisor immediately and take all necessary steps to prevent accidents from occurring while the defects are being reviewed or repaired;
- Develop a personal concern for health and suggest ways to eliminate hazards or control risk;
- Co-operate with Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) where appropriate;
- Participate in medical surveillance (e.g., hearing conservation programs, medical monitoring, etc.);
- Not remove or make ineffective any protective device required by the regulations or by the employer;
- Not to use or operate any equipment, machine, device or thing or work in a manner that may endanger themselves or another worker;
- Not engage in any prank, contest, feat of strength, unnecessary running or rough and boisterous conduct;

## **PROJECT OWNERS**

### **Duties of Project Owners (OHS s.30)**

- 1) Before beginning a project, the owner shall determine whether any designated substances are present at the project site and shall prepare a list of all designated substances that are present at the site.
- 2) If any work on a project is tendered, the person issuing the tenders shall include, as part of the tendering information, a copy of the list referred to in subsection (1).
- 3) An owner shall ensure that a prospective constructor of a project on the owner's property has received a copy of the list referred to in subsection (1) before entering into a binding contract with the constructor.
- 4) The constructor for a project shall ensure that each prospective contractor and subcontractor for the project has received a copy of the list referred to in subsection (1) before the prospective contractor or subcontractor enters into a binding contract for the supply of work on the project.
- 5) An owner who fails to comply with this section is liable to the constructor and every contractor and subcontractor who suffers any loss or damages as the result of the subsequent discovery on the project of a designated substance that the owner ought reasonably to have known of but that was not on the list prepared under subsection (1).
- 6) A constructor who fails to comply with this section is liable to every contractor and subcontractor who suffers any loss or damages as the result of the subsequent discovery on the project of a designated substance that was on the list prepared under subsection (1).

### **H&S REPRESENTATIVE (HSR) / JOINT HEALTH AND SAFETY COMMITTEE (JHSC) /JOINT OCCUPATIONAL HEALTH AND SAFETY COMMITTEE (JOHSC)**

Carry out functions and duties, as outlined H&S policy, Govan Brown' safety program and as required by the Occupational Health and Safety Act including, but not limited:

- Act as an advisory body and identify and recognize workplace hazards.
- Evaluate the hazards and risks that may cause incidents, injuries and illness.
- Participate in development and implementation of programs to protect the employees' safety and health.
- Respond to employee complaints and suggestions concerning safety and health.
- Ensure the maintenance and monitoring of injury and work hazard records.
- Monitor and follow-up hazard reports and recommend corrective action.
- Set up and promote programs to improve employee training and education.
- Participate in workplace inspections, safety and health inquiries and investigations, as appropriate.
- Consult with professional and technical experts.

- Participate in resolving workplace refusals and work stoppages.
- Make recommendations to management regarding actions required to resolve health and safety concerns, incident prevention and safety program activities.
- Monitor effectiveness of safety programs and procedures.

### **CONTRACTOR / SUBCONTRACTOR**

All contractors/subcontractors shall be made aware of our Occupational Health and Safety Program rules and regulations. The Contractor managers and/or supervisor shall be responsible for the direct supervision and safety of the contractor and their crew. They are accountable for the performance of personnel through the safe work practices and procedures as well as any other applicable Acts and Regulations. It is the contractor/subcontractor's responsibility to perform the job/services in compliance with our safety standards or other applicable legislation.

Any infractions not immediately corrected as directed by Govan Brown will result in the contractors/ subcontractors being advised of the breach of contract and the action that will be taken as a result of the breach according to company policy. It must be firmly established that our safety program protects all workers on the job, including all subcontractor's employees. All contractor/subcontractors must:

- Read and understand our company Health & Safety Program. Must be knowledgeable of and comply with all regulations, laws and codes.
- Ensure all his/her employees complete a company orientation when/where required prior to his/her employees working on site.
- Enforce all established safety regulations and work methods. Take disciplinary action necessary to ensure compliance with the rules.
- Ensure that a trade safety representative will attend regular Site Safety Meetings.
- Conduct regular inspections for unsafe practices and conditions and ensure prompt corrective action to eliminate causes of accidents and "near misses".
- Complete an accident/incident report ensuring all accidents/incidents are investigated and corrective action is taken to prevent re-occurrence. Copies of the report are given to the Govan Brown Manager/Supervisor
- Inform each employee of the hazards associated with his/her job and provides the training in the safe work practices required to perform his/her job safely.
- Impart to each employee an understanding that violation of established safety rules will not be tolerated.
- Ensure that required safety equipment and PPE are provided and used for each job.
- Observe new hire employees closely until confident of workers ability to perform assigned duties safely.

### **VISITORS**

Each visitor is responsible for safeguarding his/her own health and safety. Visitors should only enter Govan Brown project site/shop floor when absolutely required and must be supervised by an Govan Brown Manager/Foreman or competent designee.

#### All visitors must:

- Report to the office and obtain permission for entry onto the shop floor.
- Wear approved personal protective equipment as required (adequate clothing, hardhat, safety shoes).
- Comply with OHSA, associated legislation and Govan Brown Health and Safety Program Requirements.
- Report any unsafe acts or conditions to the Manager/Supervisor.
- Report any injuries sustained on the site to the Manager/Supervisor.
- Only walk in the designated safe area.

### **FIRST AID ATTENDANT**

The first aid attendant shall assist in the ongoing safety efforts in the workplace through efforts in promoting safety amongst all employees and contractors. This basic responsibility includes, but is not limited to the following:

- Administer First Aid as required.
- Ensuring that adequate first aid equipment is available, first aid room in neat, clean, and properly stocked and meets all WSIB requirements.
- Reporting hazards to the site supervisor.
- Ensure the First Aid Logbook is completed accurately and kept confidential.
- Coordinate the transportation of injured workers to a physician's office or hospital.
- Ensure first aid certificates are posted each shift for individuals on site.

- Set a good example.

## PROCEDURE

Govan Brown as an Employer promotes and fully supports established Internal Responsibility System (IRS) within an organization, where everyone has direct responsibility for health and safety as an essential part of his / her job.

The functional IRS aim to support:

- Safe and healthy workplace
- Establishes responsibility sharing systems
- Promotes safety culture
- Promotes best practice
- Helps develop self reliance
- Ensures compliance

Senior Management is responsible for ensuring that the IRS is established, promoted, and that it functions successfully as an important element of a strong health and safety culture in a workplace demonstrating respect for the people in the workplace.

Management and Supervisors are responsible for making workers fully aware of the hazards that may be encountered on the job or in the workplace; ensuring that they work safely, responding to any of the hazards brought to their attention, including taking every precaution reasonable in the circumstances for the protection of a worker. All supervisors and managers must ensure that all documentation required to demonstrate both Govan Brown and their own respective due diligence, as specified in procedures found in this Health and Safety Program, is completed, maintained and forwarded for record retention.

Worker responsibilities include: reporting hazards and injuries in the workplace; working safely and following safe work practices; using the required personal protective equipment for the job at hand; participating in health and safety programs established for the workplace, advise their direct Supervisor or manager when they lack ability and/or knowledge to perform requested tasks in a safe manner.

The Health and Safety Representative (HSR), or the Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) where applicable, should contribute to workplace health and safety because of their involvement with health and safety issues, and by assessing the effectiveness of the IRS.

Parties and organizations external to the Govan Brown workplace also contribute to workplace health and safety. These external parties include but not limited the Ministry of Labour, Training and Skills Development (MLTSD), the Workplace Safety and Insurance Board (WSIB), Health and Safety Associations and the health and safety system partners. The MLTSD's primary role is to set, communicate, and enforce workplace occupational health and safety standards while encouraging greater workplace self-reliance.

Employees within all levels of the organization are accountable for workplace health and safety and it is an integral part of that job and a full-time component of everyone's responsibilities.

- Everyone must have a sincere wish to prevent accidents and illnesses;
- Everyone must accept that accidents and illnesses have causes that can be eliminated or greatly reduced;
- Everyone must accept that risk can be continually reduced, so that the time between accidents and illnesses get longer and longer;
- Everyone must accept that health and safety is an essential part of doing his or her work (health and safety is not an extra, it is part of doing the job);
- Every person must have a clear understanding of what he/she is responsible for; what he/she can do to change matters; and when things must be done;
- Every person must be regularly asked to explain what they have done to ensure health and safety on the job and in the workplace;
- Everyone must have a clear understanding of their own skill, ability and limitations, and should have the capacity to carry out their responsibilities;
- Everyone must attempt to avoid conflict when trying to reduce risk;
- As an individual, each person must go beyond just complying with health and safety rules and standards, and strive to improve work processes to reduce risk;

- When an individual cannot reduce risk by him/herself, then they must cooperate with others to go beyond just complying with health and safety rules and standards, and strive to improve work processes to reduce risk;
- Everyone must understand the IRS process, believe in it, and take steps to make it effective at all levels in the organization; and
- No one should be fearful of reprisals when using IRS processes.

## **COMMUNICATION**

- The Health and Safety Policy and procedure will be communicated to all new hired employees through new employee general orientation or site-specific induction and/ or through periodic management and staff safety meetings or toolbox talk meetings.
- The Health and Safety Policy and procedure will be communicated to all existing employees through the OHS Program / Occupational Health and Safety Management System (OHSMS) orientation and /or through Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) communication and periodic management and staff safety meetings as well as through periodic and ongoing safety training, internal communication protocols or structured training sessions.
- The Health and Safety Policy statement will be posted on all Govan Brown' health and safety communication boards.

## **TRAINING**

- All new employees will receive awareness training as part of new employee general orientation or site-specific induction on their specific health and safety roles and responsibilities through the new hire orientation process.
- All existing employees will receive training on their health and safety roles and responsibilities through periodic staff OHS Program / Occupational Health and Safety Management System (OHSMS) orientation safety meetings as well as through periodic and ongoing safety training or structured training sessions.
- Verification of training will be confirmed via sign off and may include knowledge verification testing.

## **EVALUATION**

- The Health and Safety Policy and procedure will be reviewed on annual basis by Senior Management and /or during the annual OHS Program / Occupational Health and Safety Management System (OHSMS) internal audit and maybe changed due to business needs, any legal requirements and based on the results of the evaluation to ensure it continues to meet OHS regulation and standards and to ensure it is relevant with current operations and any changes will be indicated in the meetings minutes or reflected on the revision page.
- The Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) and management will also be involved with the evaluation by analyzing forwarded items of concern and suggesting corrective action.
- On a yearly basis, management will review OHS Program / Occupational Health and Safety Management System (OHSMS) to assess whether it is still compliant with current regulations and with the current work environment. If necessary and if required procedure will be amended to reflect the current operation.
- After the year-end audit a thorough analysis of the gaps identified will be conducted by the Internal Auditor & Senior Management will develop an action plan that addresses the deficiencies with an overall goal of continual improvement.
- Senior Management at least annually or more often as required should review and validate company Document Control Master List with indication supporting documents needed to implement, monitor and maintain active OHS Program / Occupational Health and Safety Management System (OHSMS) effectively and assess conformance with business, corporate and legal requirements as well as compliance with applicable standards.
- Document Controller or Designee will coordinate and manage Document Control Register to ensure changes to, and current versions status of, documents are identified and tracked in order to prevent the unintended use of obsolete documents and identify such documents if they are retained for any purpose.

## **REFERENCES**

Occupational Health and Safety Act R.S.O. 1990

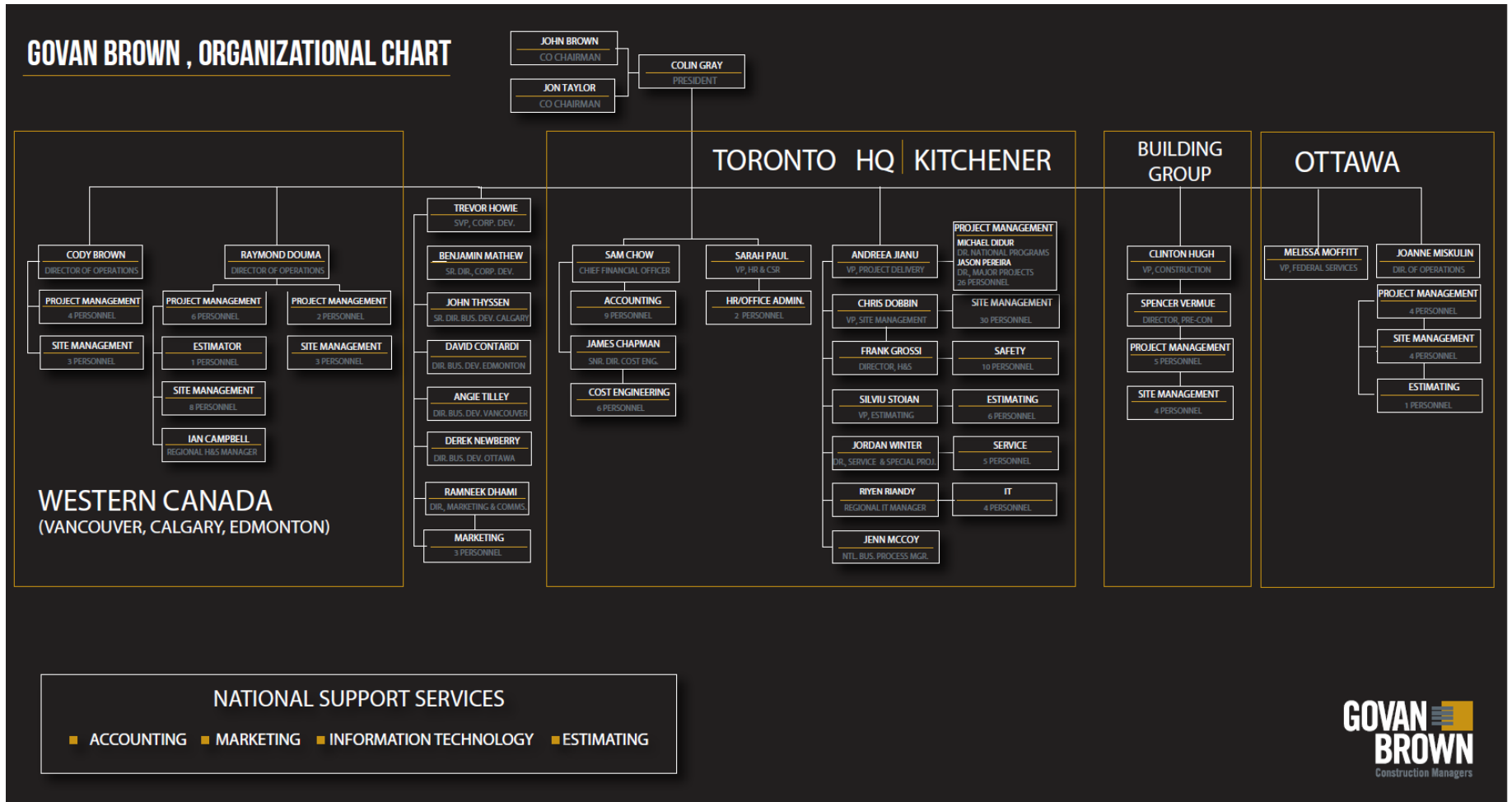
OHS Program / Occupational Health and Safety Management System (OHSMS)

Health and Safety Policy Statement

Document Control Master List

Document Control Register

**ORGANIZATIONAL CHART**



## **HAZARD ASSESSMENT, ANALYSIS AND CONTROL POLICY STATEMENT**

Hazard assessment, analysis and control process is a critical component to Govan Brown Associates Limited Occupational Health & Safety Management System. Govan Brown Associates Limited is committed to the ongoing and proactive identification of health and safety hazards, to assessing the risks associated with the hazards, and to defining and implementing controls to mitigate the risks. The goal of this program is to identify hazards, 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 conducted, documented and approved for the entire scope of work performed by Govan Brown Associates Limited employees, for non-routine tasks, and human factors where work is performed. Hazard assessments will be developed using the RACE (Recognize, Assess, Control, and Evaluate) methodology, and will be in compliance with the Occupational Health and Safety Act and all applicable regulations.

At minimum, Govan Brown Associates Limited, will:

- Perform a comprehensive occupational health & safety hazard assessment for all activities, equipment, processes and property under our control.
- Review the comprehensive occupational health & safety hazard assessment regularly to ensure its ongoing suitability for our operational needs.
- Perform Job Hazard Analysis / Assessment (JHA) prior to the start of any job requiring activities which are non-routine.
- Encourage all employees to participate in the Hazard Assessment, Analysis and Control process.
- Have in place a means of reporting hazards, once identified, and a method for implementing appropriate controls.

Govan Brown Associates Limited as the employer and represented by Senior Management hold the responsibility for ensuring that all Managers and Supervisors are committed to and have implemented the Hazard Assessment, Analysis and Control Procedure which involves the ongoing development and maintenance of the systematic process for the identification and control of hazards.

The Hazard Assessment, Analysis and Control Policy and Procedure will be reviewed by senior management at least annually or more frequently as required.

Senior management will ensure that hazard assessments are developed using a team-based approach which will include the involvement of workers and/or workers Health and Safety representatives, joint health and safety committees, supervisors and management with additional technical support, engineering expertise, maintenance /suppliers input as required.

Hazard assessments will be maintained and updated when required, to reflect process changes and re-approved as appropriate with retention of documented records of the review.

All employees will be informed of the hazards and control strategies that pertain to their tasks will be communicated accordingly. Records of communication and/or training on hazard assessments shall be retained for minimum of one year.



March 22/24

Colin Gray

Date

President – Govan Brown Associates Limited

## HAZARD ASSESSMENT, ANALYSIS AND CONTROL PROCEDURE

### PURPOSE

Govan Brown understands the integral role Hazard Recognition plays in proactive health & safety, assisting in the risk management control measures to affectively mitigate possible injury/illness in the workplace.

The Hazard Recognition & Control Policy has been developed to provide direction and orientation to Govan Brown internal staff with regards to hazard assessment procedures and applicable Occupational Health & Safety Act and Regulations. The Hazard recognition policy will also outline procedures to evaluate the hazards associated with the main tasks carried out by Govan Brown and the assessment of ongoing hazards.

### SCOPE

The policy and standard procedures apply to all Govan Brown workers; Senior Management; Managers/Supervisors and Health & Safety Representative (HSR) or Joint Health and Safety Committee (JHSC) or Joint Occupational Health and Safety Committee (JOHSC) members.

### DEFINITIONS

**Hazard** is any practice, behavior, condition, or combination that can cause injury or illness to people or damage to property.

**Risk** is the chance or probability that a person will be harmed or experience an adverse health effect if exposed to a hazard. It may also apply to situations with property or equipment loss.

**Hazard Recognition:** is a skill used by a trained individual who has the knowledge to make this determination. This could include trained workers, supervisors, members of a joint health and safety committee, or a health and safety professional. Whether identified or merely suspected, the objective is to anticipate hazards before they cause harm or damage.

**Hazard assessment** is the process where you identify hazards, analyze or evaluate the risk associated with that hazard and determine appropriate ways to eliminate or control the hazard.

**Hazard Control:** refers to corrective actions resulting from the risk assessment that are meant to minimize injury, reduce adverse health effects and property damage. The main ways to control a hazard include:

- **Elimination:** remove the hazard from the workplace.
- **Substitution:** substitute (replace) hazardous materials or machines with less hazardous ones.
- **Engineering Controls:** includes designs or modifications to plants, equipment, ventilation systems, and processes that reduce the source of exposure.
- **Administrative Controls:** controls that alter the way the work is done, including timing of work, policies and other rules, and work practices/ procedures such as standards and operating procedures (including training, emergency preparedness, housekeeping, and equipment maintenance, and personal hygiene practices).
- **Personal Protective Equipment:** equipment worn by individuals to reduce exposure such as contact with chemicals or exposure to noise.

In general, corrective actions and controls are usually placed **at the source** (where the hazard "comes from"); **along the path** (where the hazard "travels"); **at the worker**.

### COMPLIANCE

This policy and procedure are in compliance with the different provincial health and safety regulations that oblige the employer to:

- Ensure that the health and safety at work of every person employed by the employer is protected.
- Give the worker adequate information as to the risks connected with their work and provide them with the appropriate training, assistance or supervision to ensure that they possess the skill and knowledge required to safely perform the work assigned to them.

**More important than fulfilling regulatory requirements, risk assessments and risk evaluations can be** used to focus and streamline an employers' health and safety activities. Many employers do not know where to start when planning, implementing or reviewing their workplace health and safety management systems. Risk assessments and risk evaluations provide employers with a method to identify, rate and compare hazards. The employer can then focus their attention on eliminating or controlling the hazards that pose the greatest risk to workers.

## ROLES AND RESPONSIBILITIES

### MANAGEMENT

- To ensure that all supervisors, managers, and workers are trained with regard to the procedural framework as part of Hazard Assessment, Analysis and Control Policy.
- To ensure that hazard assessments are completed, documented, reviewed for all operations and activities.
- To ensure hazard assessments are maintained and reviewed on an annual basis, or as often as necessary and control measures met in reasonable timeframe.
- To ensure that appropriate personnel involved in the hazard assessment process, using a team-based approach.
- To ensure that workers affected by the hazards identified in a hazard assessment process are informed of the hazards and of the methods used to control or eliminate the hazards.
- To ensure that the supervisor and Health & Safety Representative have the time and resources to perform the hazard assessment and risk analysis.
- To ensure subcontractors provide and adhere to safe work practices requirements based on their own health and safety program and hazard assessments by subcontractors for all high risk activities monitored.
- To review the hazard risk assessment with area supervisors and work to identify controls for any hazards not addressed; assist to identify, develop and implement a plan to address the identified risks.
- To review existing job description and physical demands analysis with the Health & Safety Representative (HSR) / Joint Health and Safety Committee (JHSC)/Joint Occupational Health and Safety Committee (JOHSC) Member and/or supervisor as required.
- To review the hazard risk assessment with supervisors and workers to identify controls for any hazards not addressed; assist to identify, develop and implement a plan to address the identified risks.
- To ensure that the action plan developed is implemented and followed up to review suitability.
- To review with the supervisors any hazards reports and to immediately address the hazard identified if possible or develop a plan to address the identified risk.
- **Specific to Province of Alberta:** Ensure individuals responsible for leading formal hazard assessments have received training (Leadership for Safety Excellence, etc.) (Alberta Province Only)

### SUPERVISOR

- To lead the hazard assessment process by ensuring that hazard assessments are completed, documented, and reviewed for all operations and activities.
- To involve workers in the hazard assessment process.
- **Specific to Province of Alberta:** Participate and receive training for leading formal hazard assessments
- To communicate hazards and controls identified on the hazard assessments (i.e., through safety meetings, site safety plan, orientation, training sessions, site specific hazard assessments).
- To ensure workers understand, review, and sign off on the hazard assessments and ensure that controls are developed and implemented for identified hazards in a timely manner.
- To support and review the process of ongoing hazard assessments.
- To ensure that all workers/subcontractors are trained with regard to the procedural framework as part of Govan Brown Hazard Assessment, Analysis and Control Policy.
- To review existing job description and physical demands analysis with the Health & Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) Member and manager.
- To conduct a hazard risk assessment for job duty with the Health & Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) Member and worker participation in a timely manner as identified.
- Review hazard risk assessment and immediately implement any possible controls to mitigate against risk based on risk rating measuring risk level.
- To assist management to implement the action plan to mitigate identified hazard risk factors and follow up on implementation.
- To review and educate all workers with regards to the hazards of the workplace and job duties and to confirm their understanding and awareness.
- To review all hazard reports forwarded by any/all Govan Brown employees with the Site Manager and immediately implement corrective action or develop an action plan to implement corrective actions to eliminate or reduce the identified hazard(s).



**HEALTH & SAFETY REPRESENTATIVE / JOINT HEALTH & SAFETY COMMITTEE / JOINT OCCUPATIONAL HEALTH AND SAFETY COMMITTEE (JOHSC) MEMBER**

- To work with supervisors and management to identify and control hazards in the workplace through the hazard assessment process.
- To participate in the development of hazard assessments and follow established safe work practices and safe job procedures.
- To participate in review existing job description and physical demands analysis with the site manager and supervisor.
- To immediately implement any possible controls to mitigate against risk based on risk rating level.
- To assist management to implement the action plan to mitigate identified hazard risk factors.
- To forward any hazard reports to management.
- To understand, review, and sign off on hazard assessments given by management or supervisor.
- To follow hazard control measures identified for their work.
- To review each hazard risk assessment with the supervisor and site manager.

**WORKERS**

- All workers are required to participate cooperatively with the hazard risk assessment process in the workplace.
- Workers are required to review each hazard risk assessment provided to them by management and to ensure to follow the identified safe work procedures to mitigate against identified hazards of the workplace and job duties.
- Workers are required to comply and follow identified safe work procedures.
- Report and or document any actual and potential hazards in the workplace

**CONTRACTOR / SUBCONTRACTOR**

- Apply the Hazard Recognition and Risk Assessment process to all routine and non-routine operations conducted by the contractor/subcontractor/service provider, considering aspects factors such as location and work method including human factors.
- Assign competent individuals or a competent team with the necessary technical, scientific, legal knowledge, practical experience, and familiarity with the specific work environment to conduct the hazard assessment.
- Conduct hazard assessments to identify and evaluate actual and potential hazards associated with contractor/subcontractor/service provider operations in the following situations:
  - Before starting a new task.
  - When introducing or changing equipment, materials, substances, or processes.
  - When changes in the management system could impact workplace operations or activities.
  - When legislative compliance requires it.
- Collaboratively identify and assess occupational health and safety hazards, involve workers, workers' health and safety representatives/joint health and safety committees, and management in the process.
- Submit all hazard assessment documentation to Govan Brown for review and approval.
- Ensure hazard assessments are maintained and control measures are developed and implemented in a timely manner.
- Review hazard assessments when uncertain or when changes invalidate the original assumptions, and reassess risks based on critical factors, situational awareness and various circumstances.
- Familiarize yourself with the GB company Health & Safety Program and comply with relevant regulations, laws, and codes.
- Ensure all employees receive the necessary company orientation before starting work on-site.
- Enforce safety regulations and work methods, taking disciplinary action if necessary to ensure compliance.
- Have a safety representative from the respective trade attend regular Site Safety Meetings.
- Regularly inspect for unsafe practices and conditions, promptly taking corrective actions to prevent accidents and near misses.
- Complete accident/incident reports for all incidents, conduct investigations, and implement corrective actions to prevent recurrence. Provide copies of the reports to the Govan Brown Manager/Supervisor.
- Inform employees about the hazards associated with their jobs and provide training in safe work practices.
- Clearly communicate to employees that violating safety rules will not be tolerated.
- Provide and ensure the use of necessary safety equipment and personal protective equipment (PPE) for each job.

## HAZARD RECOGNITION PROCESS

One of the most important aspects of hazard risk assessment is accurately identifying the potential hazards in workplace through the hazard recognition.

Hazard recognition is part of the hazard risk assessment process in workplace used to identify and evaluate if any particular situation, item, thing, condition may have the potential to cause harm or adverse health effect to a person or property.

Overall, the goal of hazard recognition is to find and record possible hazards that may be present in workplace. It may help to work as a team and include both people familiar with the work area, as well as people who are not – this way you have both the experienced and fresh eye to conduct the inspection.

Workplace hazards can come from a wide range of sources and in general include any substance, material, process, and practice or condition that has the ability to cause harm or adverse health effect to a person or property.

A common way to classify hazards is for example by category:

- Biological - bacteria, viruses, insects, plants, birds, animals, and humans, etc.,
- Chemical - depends on the physical, chemical, flammability and toxic properties of the chemical,
- Ergonomic - repetitive movements, improper set up of workstation, etc.,
- Physical - extreme temperatures, pressure extremes (high pressure or vacuum), noise, ventilation, work area layout etc.,
- Psychosocial - stress, violence, etc.,
- Safety - slip/trip hazards, inappropriate machine guarding, equipment malfunctions / breakdowns, machinery and processes etc.

Workplace hazards also include practices or conditions or processes that release uncontrolled energy like:

- an object that could fall from a height (potential or gravitational energy),
- a run-away chemical reaction (chemical energy),
- the release of compressed gas or steam (pressure; high temperature),
- entanglement of hair or clothing in rotating equipment (kinetic energy),
- contact with electrodes of a battery or capacitor (electrical energy).

## HAZARD RISK ASSESSMENT PROCESS & METHODOLOGY

Hazard Risk assessments are a systematic method of identifying workplace hazards and evaluating the risk they pose to workers. The purpose of a hazard risk assessment is to make recommendations to eliminate or reduce the risk that a hazard poses to workers.

Hazard risk assessments are conducted on hazards that arise out of the job processes or methods used within the workplace using the RACE (Recognize, Assess, Control, Evaluate) methodology and following -requirement to utilize a standardized risk rating system to prioritize risks before and after identifying controls.

Evaluation of job processes conducted only on work that is within the normal scope of daily work and is done only on work that follows established safe work procedures and/or legislated and regulated requirements.

Govan Brown has 3-tier(s) Hazard Risk Assessment process in place and this process include the following:

- Development & Maintenance of the Company Occupational Health & Safety Risk Registry (OHS RR) that encompasses hazards identification and risk evaluation for the activities/ tasks performed by Govan Brown or its subcontractors with identification of the control measures;
- Development & Maintenance of the Company Construction Hazard Assessment (CHA) based on the identified hazards associated with project specific operations and control measures according to the risk factors;
- Perform Job Hazard Analysis / Assessment (JHA) with all relevant workplace parties and assess the hazards associated with non-routine activities and identify the control measures according to the risk factors and ensure implementation as required.

Govan Brown utilize specific forms for recording hazard assessments, analysis and control which include but not limited:

- Occupational Health & Safety Risk Registry (OHS RR)
- Construction Hazard Assessment (CHA)
- Job Hazard Analysis / Assessment (JHA) or equivalent based on Client / Joint Venture or project site specific requirements including software /mobile application modules, as long as the intent of the requirements is met.

**Competency and participation of workplace parties**

Senior Management will ensure that hazard assessment is conducted by competent person and or team of competent individuals who have technical, scientific and legal knowledge as well as a good working experience and familiar with the situational awareness and work to being studied/assess.

In order to conduct efficient hazard assessment, the assigned and involved competent person and or team of competent individuals should at least possess the following:

- Knowledge of the hazards and risks associated with the tasks for the operations and activities including routine and non-routine tasks, and human factors where work is performed.
- Demonstrated understanding and working knowledge of the hierarchy of controls and implementing control measures associated with the hazards and risks
- Training, skills and experience with regard to the hazard’s recognition, risks evaluation and elaboration of associated control measures.
- Aptitudes, such as skillset, ability and willingness to deal with the hazards, risks and control measures

The organisation will ensure that ongoing and proactive identification of occupational health and safety hazards, assessment of the risks posed by the hazards, and development and implementation of controls to mitigate the risks are based on using a team-based approach that, at the very least, involves participation from workers and/or involvement from workers' health and safety representatives/joint health and safety committees and management.

This include but not limited either on the team or as sources of information, the supervisors and workers who work with the process under review as these individuals are the most familiar with the operation.

When conducting hazard assessment other appropriate internal workplace parties’ input or external subject matter expertise could be utilized in addition. Industry experts and specialists with extensive knowledge of specific disciplines, including but not limited additional technical support, engineering expertise, maintenance /suppliers/manufacture recommendations or H&S professional advisory and consultation with regional/local authority may be needed to review complex engineering, safety-related issues as required.

**Hazard assessments requirements and review**

Hazard Recognition and Risk Assessment process applies to all routine and non-routine operations which will also include the human factors where and how work is performed.

Identified actual and potential hazards for all routine and non-routine operations including human factors will be evaluated and hazard assessment will be completed:

- prior to the start of a new task,
- when equipment, materials, substances, or processes are introduced or changed,
- when a change to the management system may impact workplace operations or activities
- when it is a legislative compliance requirement

Hazard assessments will be reviewed in the event of doubt or where there are changes to the information or circumstances which would invalidate the original assumptions used or when critical factors and number of circumstances will require the reassessment and review of relevant risks which include but not limited:

- A change in legislation.
- A change in control measures.
- Any significant change in work practices and processes.
- Introduction or installation of new machinery and equipment.

In addition, hazard assessments are to be reviewed and updated when a new phase begins and or after an investigation if required for a corrective/preventative action, or at minimum they will be reviewed annually.

**Hazards originated outside of the workplace**

Govan Brown recognize that employees may encounter hazards originating outside of the workplace that may impact OHS within the workplace for which the organization has control and this might include but not limited:

- hazards result from activities that are not part of the organization's operations
- hazards result from activities by those performed by its workers but arise from the activities of others including visitors to the workplace or of contractors doing work
- activities performed in the vicinity of the workplace to which the organization's employees could be exposed may also generate hazards
- organization's activities may affect other people who are in the vicinity of the workplace.
- working off-site at a location that is not under its direct control.

Govan Brown will ensure application of established Hazard Recognition and Risk Assessment process in case of such circumstances and follow the requirement to identify hazards originating outside of the workplace that may impact OHS within the workplace for which the organization has control.

The organisation will ensure that ongoing and proactive identification of occupational health and safety hazards, assessment of the risks posed by the hazards, and development and implementation of controls to mitigate the risks are maintained and monitored and sufficient hazard assessments developed using the RACE (Recognize, Assess, Control, and Evaluate) methodology which may include but not limited:

- Perform a comprehensive occupational health & safety hazard assessment for all activities, equipment, processes and property considering situational awareness as well as casual and contributing factors.
- Review the comprehensive occupational health & safety hazard assessment regularly to ensure its ongoing suitability for our operational needs.
- Perform, review and communicate task occupational health & safety hazard assessment prior to the start of any job requiring activities which are new or unusual.
- Encourage all employees to participate in the Hazard Assessment, Analysis and Control process.
- Have in place a means of reporting hazards and a method for implementing appropriate controls

### **Reporting hazards**

No Reprisal: All Govan Brown employees are encouraged to report hazards and will not be subject to disciplinary action or any reprisal for reporting hazards.

It is the responsibility of all employees to report any existing actual or potential hazards that they identify or become aware of during their day-to-day job duties per Govan Brown Health and Safety Policy and Occupational Health & Safety Act and Regulations.

Govan Brown continue support hazard reporting requirement and maintain following necessary arrangements available to employees to report hazard which include, but not limited:

- Verbal communication and reporting: directly to supervision and/or H&S Representative.
- Worker feedback protocol: complete and submit standardize worker feedback form with comments and opinions on improvement or suggestions regarding the actual or potential hazard and/or return the completed form to your supervisor or through or email system.
- H&S Representative (HSR) / JHSC/ JOHSC Recommendation & Suggestion: Inform workers HSR and/or JHSC /JOHSC member in workplace about unsafe condition or action in order to formalize and provide documented recommendation to senior management for response within set timeframe.

All Govan Brown employees are to participate in the hazard assessment, analysis and control process and employees must always be aware of his/her surroundings. It is the responsibility of the worker to report anything that he/she deems as hazardous providing the hazard report to their supervisor, Health & Safety representative or Joint Health & Safety Committee representative immediately.

### **Legislative and other requirements.**

Govan Brown identified and established effective policy and procedural framework to know and understand all legal requirements that are applicable to our operational activities.

Govan Brown will examine the activities performed by the company regarding applicable health and safety legislation. The company, as well as workers, must adhere to all guidelines, rules, and regulations as outlined by applicable health and safety legislation, associated standards and guidelines.

Govan Brown will consider health and safety legislation, associated standards and guidelines during the job planning /hazard assessment process and ensure that all copies of relevant legislation are readily available at each workplace, as required.

Govan Brown will ensure applicable legislation is made available to workers starting from the initial onboarding process to the completion of a project and during the course of the employment and performing work activities at Govan Brown locations.

Govan Brown will ensure that all legislated posting requirements are being met and monitor the changes and update in applicable regulations and legislation with further communication of the up-to-date information to workers.

Annual performance reviews will be conducted by Senior Management to review health and safety due diligence and legislative requirements including the list of applicable legislation.

Govan Brown will ensure evaluation of compliance to legislation at regularly planned intervals with retention of records of evaluations including workplace inspection reports, hazard assessment documentation and other specific forms as required.

### **Specific to Province of Alberta:**

Job Hazard Analysis are to be completed daily, involving all workers and subcontractors on site, prior to the commencement of any work, and repeated when a new activity has been temporarily introduced at the work site, before the job or task begins, and repeated if changes are introduced. Driving is to be included in the daily Job Hazard Analysis, if driving is part of their job scope. Whenever a new piece of equipment or work process is introduced or modified prior to being used by employees a Construction Hazard Assessment must be created or reviewed. All Construction Hazard Assessment are to be reviewed during the orientation process with all employees, and once annually or as any changes are made or introduced. The process is to be repeated when site-specific job hazard analysis, inspections, or investigations identify a previously unrecognized hazard.

Site-specific hazard assessment (also called field-level) are to be completed prior to the commencement of any work, before the job or task begins. There must be involvement of all workers involved in the work being performed. The process must be complete, repeated and/or revised when work is at temporary/mobile worksites, when workers are conducting activities at a worksite not owned by their employer, and when a new activity starts at a worksite. Driving is to be included in the daily Job Hazard Analysis, if driving is part of their job scope.

Formal Hazard Assessments are created for all jobs/positions within the company. Construction Hazard Assessments are created to encompass all work activities for specific projects. Both are created to identify hazards, measure risk, and develop, monitor, and implement hazard controls. The documents must be reviewed by employees performing the job/task, involved in the work project, and once annually. They are to be created, reviewed, or revised when site-specific job hazard analysis, inspections, or investigations identify a previously unrecognized hazard, when operations, work-related processes, or equipment are modified, and/or when new operations, work processes, equipment, materials, or products are introduced.

### **GENERAL STEPS FOR HAZARD ASSESSMENT:**

- Assemble workers involved in work and identify the scope of work planned to be performed and list task and/or activity for each job or work site location.
- **Specific to Province of Alberta:** Site specific hazard assessments must take into consideration when work is at temporary/mobile worksites; when workers are conducting activities at a worksite not owned by their employer; when a new activity starts at a worksite; before a job or task begins; and/or when changes occur at a worksite.
- Identify potential or actual health and safety hazards or potential loss for each task posed by the activities and the work environment (physical, biological, chemical, musculoskeletal, psychosocial, and safety hazards).
- Look at People, Equipment, Materials, Environment & Processes as well as Energy and its Transfer.
- Consider legal requirements and associated standards and guidelines.
- Consider design and layout of the work area, ergonomics, machinery and processes.
- Determine the probability of harm, such as an injury or illness occurring, and its severity.
  - Consider normal operational situations as well as non-standard events such as maintenance, shutdowns, power outages, emergencies, extreme weather, etc.
  - Review all available health and safety information about the hazard such as Safety Data Sheet (SDS), manufacturers literature, information from reputable organizations, results of testing, workplace inspection reports, records of workplace incidents (accidents), including information about the type and frequency of the occurrence, illnesses, injuries, near misses, etc.
  - Refer to applicable regulations and understand the minimum legislated requirements for your jurisdiction, determine lack of consistency and extent of specific legislation.
- Assess the hazard(s) and evaluate the risk with ranking the hazards according to risk. utilizing a standardized risk rating system to prioritize risks before identifying controls
- Identify actions necessary to eliminate the hazard, or control the risk using the hierarchy of control methods and standardized risk rating system to prioritize risks after identifying controls.
- Implement the selected controls and communicate the hazards & controls and follow the controls.
- Evaluate to confirm if the hazard has been eliminated or if the risk is appropriately controlled.
- Monitor to make sure the control continues to be effective. Review and revise the hazard assessment as needed.
- Keep any documents or records that may be necessary. Documentation may include detailing the process used to assess the risk, outlining any evaluations, or detailing how conclusions were made.

### **When doing an assessment, also take into account:**

- Legal requirements and associated standards and guidelines;
- The methods and procedures used in the processing, use, handling or storage of the substance, etc.

**HAZARD ASSESSMENT, ANALYSIS AND CONTROL**  
**HAZARD ASSESSMENT, ANALYSIS AND CONTROL PROCEDURE**

- The actual and the potential exposure of workers (e.g., duration and frequency).
- The measures and procedures necessary to control such exposure by means of engineering controls, work practices, and hygiene practices and facilities.
- The duration and frequency of the task (how long and how often a task is done).
- The location where the task is done.
- The machinery, tools, materials, etc. that are used in the operation and how they are used (e.g., the physical state of a chemical, or lifting heavy loads for a distance).
- Any possible interactions with other activities in the area and if the task could affect others.
- The lifecycle of the product, process or service (e.g., design, construction, uses, decommissioning).
- The education and training the workers have received.
- How a person would react in a particular situation (e.g., what would be the most common reaction by a person if the machine failed or malfunctioned).

It is important to remember that the assessment must take into account not only the current state of the workplace but any potential situations as well.

By determining the level of risk associated with the hazard, the employer, and the health and safety committee (where appropriate), can decide whether a control program is required and to what level.

**HAZARD RATING SYSTEM**

An important step in the analysis process is that of prioritizing the identified and assessed hazards. An event that could result in immediate or obvious threat to life or health should be assigned the highest priorities. In this case, the controls should be implemented prior to work commenced or the work associated with this hazard would be stopped until controls could be implemented. All corrective actions and controls resulting from the risk assessment are meant to mitigate hazard, to minimize injury, to reduce adverse health effects and property damage. The hierarchy of controls and main ways to control a hazard might include:

TYPES OF CONTROL	HIERARCHY OF CONTROL
Elimination Substitution	At the source of the hazard
Engineering Administrative	Along the path from the source to the worker
Personal Protective Equipment (PPE)	At the worker

The Hazard Rating System “HRS” is a tool that identifies the substandard practice or condition and immediately establishes its priority for correction according to its level of Probability and Severity.

A (HIGH)	
<b>Definition</b>	A condition or practice likely to cause permanent disability, loss of life or extensive loss to property equipment/material
<b>Example</b>	Missing: barriers, guards, fall arrest, opening cover; Inadequate: Lock-out, respiratory protection, equipment or tool;
<b>Action</b>	Immediate action required to eliminate the hazardous condition or practice.
B (MEDIUM)	
<b>Definition</b>	Condition or practice likely to cause a serious injury resulting in temporary disability or property damage that is disruptive but not extensive.
<b>Example</b>	Poor housekeeping, slippery work surface, missing fire extinguisher, inadequate brakes on scaffold, missing Traffic Control Plan etc.
<b>Action</b>	Action to be taken as soon as possible to rectify the Hazardous Condition, but immediately correct the unsafe Practice
C (LOW)	
<b>Definition</b>	Condition or practice likely to cause a minor, non-disabling injury or non-disruptive property damage.
<b>Example</b>	Bad smell from Form Oil, workers handling sharp equipment/tools without gloves.
<b>Action</b>	Action may be taken depending on the level of irritancy, and the levels of frequency and probability.

**RISK CHART**

The Risk Chart is a means of combining qualitative or quantitative ratings of probability and severity to produce a level of risk or risk rating score.

The main focus of this chart is to prioritize or rank risks. It is used as a screening tool when many risks have been identified, for example to define which risks need further or more detailed analysis, which risks need treatment first or which need to be referred to a higher level of management.

Each element of Risk Chart is assigned with a numeric value. Probability and Severity values are multiplied together and the product is used to determine to be the Risk Rating Score. The larger the risk value, the greater the chance of injury or illness occurring, and the higher priority controlling the hazard.

**Identify the Probability / Likelihood of Occurrence.**

Probability looks at the likelihood of an incident occurring.

**PROBABILITY SCORE RANGE:**

MAXIMUM 4 = **Expected:** Very likely to happen.

MINIMUM 1 = **Remote:** Very unlikely to happen.

The probability range intent is presented along the **top** of the Risk Chart ranging as:

PROBABILITY OF OCCURRENCE			
Expected 4	Likely 3	Possible 2	Remote 1
Very likely to happen	Has happened or reasonable to assume	Possible, a chance it could happen	Very unlikely to happen

**Determine the Severity / Consequences**

Severity measures the degree of harm that exposure to the hazard could result in.

The severity of harm resulting from a hazardous event or combination of hazardous events can be determined by estimating the potential degree of injuries, illness or damage to the physical or mental health of the worker. When estimating severity, the short and long term effects should be considered.

**SEVERITY SCORE RANGE:**

MAXIMUM 4= **Catastrophic:** Death, significant injury or property damage

MINIMUM 1= **Negligible:** Injury/illness/property damage not likely.

The severity range intent is presented along the **left side** of the Risk Chart ranging as:

<b>SEVERITY OF INJURY</b>	4	<b>Catastrophic</b>	Death, significant injury or property damage over \$5000
	3	<b>Critical</b>	Medical aid, lost time incident, property damage \$1000 - 5000
	2	<b>Marginal</b>	First aid injury, minor illness, property damage under \$1000
	1	<b>Negligible</b>	Injury/illness/property damage not likely

The below Risk Chart is to capture a Pre-Control Risk and Post Control Risk Level with reviewing probability and severity ratings.

RISK CHART		PROBABILITY OF OCCURRENCE			
		Expected 4 Very likely to happen	Likely 3 Has happened or reasonable to assume	Possible 2 Possible, a chance it could happen	Remote 1 Very unlikely to happen
SEVERITY OF INJURY	<b>Catastrophic</b> 4 Death, significant injury or property damage	16	12	8	4
	<b>Critical</b> 3 Medical aid, lost time incident, property damage	12	9	6	3
	<b>Marginal</b> 2 First aid injury, minor illness, property damage	8	6	4	2
	<b>Negligible</b> 1 Injury/illness/property damage not likely	4	3	2	1

**OBTAINING THE RISK RATING SCORE**

The risk is the Probability of injury or harm occurring together with an indication of Severity how serious that injury or harm could be. It could be evaluated based on simple formula:

**RISK RATING SCORE = PROBABILITY X SEVERITY**

*Example of risk rating score calculation:*

Use the above Risk Chart and multiply the **Probability** value by **Severity** value to obtain the total risk rating score.

E.g., **Probability** assessed as **Possible = 2** and **Severity** assessed as **Marginal = 2**

**Risk Rating Score = Probability x Severity = 2 x 2 = 4. Total Risk Category Rating Score = 4**

There are 3 main groups of Final Risk Rating Score presented below in table:

RISK RATING = PROBABILITY X SEVERITY TOTAL RISK SCORE	RISK CATEGORY	
	Letter / Number /Colour pattern	
9-16	HIGH	A
4-8	MEDIUM	B
1-3	LOW	C



## ANALYSIS AND MONITORING

- Analyze each risk score to determine which identified risks need to be addressed first. Hazards with high risk scores should be addressed first as they have a higher severity and the chance of injury is greater.
- Determine if there is a control in place and whether control is adequate; if no control is in place recommend a control to mitigate eliminating or reduce the risk.
- Evaluative to confirm if the hazard has been appropriately controlled.
- Monitor to make sure the control continues to be effective. Review and revise the hazard assessment as needed.
- Forward a copy of the risk assessment to the Manager / Supervisor for review and sign off.
- The Manager, H&S Representative and area supervisor to create and identify a plan including timeline and responsibility to develop, implement and follow up on the control to ensure that the control is in place and has mitigated against the risk (Utilize the Hierarchy of Controls).
- Each finalized hazard risk assessment will then be filed to be reviewed with each new hire and existing employee to ensure that they understand and are aware of the hazards of the job and the controls in place to eliminate/reduce the hazard(s).
- On an annual basis or when there is a change in operations/machinery and/or there is a trend of accidents, if there is a serious incident and/or there is a near miss then a new hazard risk assessment should be completed.

## CRITICAL TASK DEFINITION AND THRESHOLD

Through the established Hazard Recognition, Assessment, Analysis and Control process Govan Brown recognizes that some activities or tasks might have the residual Total Risk Score above the highest medium level and these activities or tasks are categorized as **critical tasks** with further evaluation of risk factors and implementation of specific control measures.

When Probability X Severity and residual Total Risk Score rating equals or exceeds value of **8** (i.e., the highest medium level), the Safe Job Procedure, Training and Supervision along with specific instructions and additional controls should be implemented for critical tasks.

Govan Brown management and supervisors will evaluate and maintain the Occupational Health & Safety Risk Registry and Construction Hazard Assessment with the identified critical tasks and recommended controls.

Govan Brown management and supervisors will evaluate and maintain a list of identified critical tasks and/or activities based on the risk rating system.

Critical tasks list will be reviewed and updated annually as part of Health & Safety Program Review and revised as necessary.

## HAZARDS REPORTING

Govan Brown emphasizes the importance of employees reporting hazards without fear of negative consequences or retaliation. According to the Health and Safety Policy of Govan Brown, as well as the Occupational Health & Safety Act and Regulations, all workers have a duty to promptly notify any identified actual or potential hazards encountered during their daily work responsibilities. Active involvement in the hazard assessment, analysis, and controls is expected from all Govan Brown employees, who should constantly remain aware of their surroundings. Workers bear the responsibility of promptly informing area supervisor, designated Health & Safety representative and or Joint Health & Safety Committee representative of any perceived hazards or unsafe conditions in workplace.

## COMMUNICATION

- The Hazard Assessment, Analysis and Control Policy and Procedure will be communicated to all new hired employees through new employee general orientation or site-specific induction and/ or through periodic management and staff safety meetings or toolbox talk meetings
- The Hazard Assessment, Analysis and Control Policy and Procedure will be communicated to all existing employees through the OHS Program / Occupational Health and Safety Management System (OHSMS) orientation and /or through Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC)/Joint Occupational Health and Safety Committee (JOHSC) communication and periodic management and staff safety meetings as well as through periodic and ongoing safety training, internal communication protocols or structured training sessions.
- The Hazard Assessment, Analysis and Control Policy and Procedure is located in the Govan Brown health and safety binder.

**TRAINING**

- All new managers, Supervisors, and Workers will receive training in the Hazard Assessment, Analysis and Control Policy and Procedure during their on-boarding training upon hire.
- All existing Managers, Supervisors and workers will receive periodic refresher training on Hazard Assessment, Analysis and Control Policy and Procedure during safety training, during general safety meetings, HSR/ JHSC/JOHSC, and safety talks.
- Each worker trained on the Hazard Assessment, Analysis and Control Policy and Procedure will sign off confirming their attendance and understanding.

**EVALUATION**

- Hazard Assessment, Analysis and Control Policy and Procedure will be evaluated by review of submitted work site hazard reports, risk assessment reports, accident reports, accident trends, orientation files, JHSC/JOHSC minutes and safety audits.
- The policy will also be evaluated through the analysis and feedback from all staff in involved in the Hazard Assessment, Analysis and Control process and form completion.
- Compliance and efficiency of policy will be measured by looking at the following:
  - Has legislation changed? Are there new best practices in the industry?
  - Is the health and safety standard being implemented?
  - Are the health and safety goals being met?
  - Is communication about the standard, both to and from employees, clear and understood?
  - Is training to the standards being completed and are employees benefiting from it?
  - Are employees following safe work procedures?
- This procedure will be reviewed on annual basis by Senior Management and /or during the annual OHS Program / Occupational Health and Safety Management System (OHSMS) internal audit and maybe changed due to business needs, any legal requirements and based on the results of the evaluation to ensure it continues to meet OHS regulation and standards and to ensure it is relevant with current operations and any changes will be indicated in the meetings minutes or reflected on the revision page.
- The Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) and management will also be involved with the evaluation by analyzing forwarded items of concern and suggesting corrective action.
- On a yearly basis, management will review OHS Program / Occupational Health and Safety Management System (OHSMS) to assess whether it is still compliant with current regulations and with the current work environment. If necessary and if required procedure will be amended to reflect the current operation.
- After the year-end audit a thorough analysis of the gaps identified will be conducted by the Internal Auditor & Senior Management will develop an action plan that addresses the deficiencies with an overall goal of continual improvement.
- Senior Management at least annually or more often as required should review and validate company Document Control Master List with indication supporting documents needed to implement, monitor and maintain active OHS Program / Occupational Health and Safety Management System (OHSMS) effectively and assess conformance with business, corporate and legal requirements as well as compliance with applicable standards.
- Document Controller or Designee will coordinate and manage Document Control Register to ensure changes to, and current versions status of, documents are identified and tracked in order to prevent the unintended use of obsolete documents and identify such documents if they are retained for any purpose

**REFERENCES**

Occupational Health and Safety Act R.S.O. 1990  
OHS Program / Occupational Health and Safety Management System (OHSMS)  
Document Control Master List  
Document Control Register  
Occupational Health & Safety Risk Registry (OHS RR)  
Construction Hazard Assessment (CHA)  
Job Hazard Analysis / Assessment (JHA) or equivalent  
Addendum: Subcontractor Safety Package  
Addendum: Index of Safe Work Practices (SWP) and Addendum: Index of Safe Job Procedures (SJP)  
List of Applicable Legislation

**CONTROLS POLICY STATEMENT**

Govan Brown Associates Limited recognizes that development and implementation of controls through hazard assessment, analysis and control process outcomes are critical components of our Occupational Health & Safety Management System and is committed and fully support the ongoing and proactive identification of health and safety hazards, assessment of the associated the risks with identification and implementation controls to mitigate the risks.

The goal of our controls policy supported by integrated supplementary elements policies with interrelated and interacting procedures is to develop and implement technically feasible and reasonably achievable hazards and risk control measures effectively in a timely manner based on decision-making concept with ALARA (As Low As Reasonably Achievable) principles and application of hierarchy of controls through:

Elimination	At the source of the hazard
Substitution	
Engineering	Along the path from the source to the worker
Administrative	
Personal Protective Equipment (PPE)	At the worker

Govan Brown Associates Limited as the employer and represented by Senior Management holds the responsibility for ensuring that all Managers and Supervisors are committed to and have implemented controls policy and associated supplementary arrangements which involves the ongoing development and maintenance of the systematic process and protocols for effective hazards controls and risk management.

Senior management will ensure that hazard controls are developed using a team-based approach which will include the involvement of workers and/or workers Health and Safety representatives, joint health and safety committees, supervisors and management with additional technical support, engineering expertise, maintenance /suppliers input as required.

Govan Brown Associates Limited will ensure that hazards and control strategies and measures that pertain to our operational tasks and activities are communicated to employees and relevant work parties within the scope of the OHS Program / Occupational Health and Safety Management System (OHSMS) and records of communication and/or training on hazard controls arrangements shall be retained.

This policy and supplementary procedures will be reviewed by senior management at least annually or more frequently as required to ensure hazard controls measures and arrangements are maintained and updated when required, to reflect process changes, regulations updates and re-approved as appropriate with retention of documented records of the review.

In line with Health & Safety policy and in order to support Controls policy Govan Brown Associates Limited determined following integrated supplementary elements policies with interrelated and interacting procedures within the scope of the current OHS Program / Occupational Health and Safety Management System (OHSMS):

- Hazard Analysis & Control
- Safe Work Practices & Safe Job Procedures
- Procurement and Contractor Management
- Company Rules & Disciplinary Policy
- Personal Protective Equipment
- Preventive Maintenance
- Training & Communication
- Workplace Inspections
- Investigations & Reporting Policy & protocols
- Emergency Preparedness & ERP
- Statistics & Records
- Legislation
- Occupational Health
- First Aid program
- Health & Safety Representative / JHSC/JOHSC
- Workplace Violence & Harassment Policy and Program
- Return to Work Policy Statement and Program
- Management Review & Management of Change



March 22/24

Colin Gray

Date

President – Govan Brown Associates Limited

## SAFE WORK PRACTICES (SWP) PROCEDURE

### PURPOSE

The purpose of a Safe Work Practice (SWP) is to provide guidelines and written methods outlining how to perform a task with minimum risk to people, equipment, materials, environment, and processes as well as to aid in the protection from occupational illness, injury or loss by standardizing the performance of work and raising awareness for common hazards and associated controls.

### SCOPE

Safe Work Practices will be established for common tasks where a moderate to high level of risk exists, as identified through the hazard assessment process, incident investigation corrective actions, recommendations, inspections and observations.

Safe Work Practices will be reviewed with workers, where appropriate, through toolbox talks and other safety meetings.

Safe Work Practices will be documented and approved and will be readily available at all workplaces and located where workers have easy access to them.

All employees are required to work in compliance with established Safe Work Practices.

## ROLES AND RESPONSIBILITIES

### MANAGEMENT

- Elaborate Safe Work Practices for all common tasks which present a moderate to high level of risk of injury, occupational illness, or damage as a result of completing a Hazard Assessment and closely reflect the activities most common in the company's type or sector of construction.
- Encourage workers to participate in the developing of Safe Work Practices and identify employees qualified to assist in the development of Safe Work Practices.
- Ensure controls and Safe Work Practices are documented, approved and readily available at all workplaces and located where workers have easy access to them.
- Train supervisors to this Program and all Safe Work Practices appropriate to their work.
- Ensure through observation and inspection that work is performed in compliance with Safe Work Practices.
- Review Safe Work Practices annually to ensure they are complete and current with existing industry best practices and all applicable legislation.
- Ensure subcontractors provide and adhere to Safe Work Practices requirements based on their own health and safety program.

### SUPERVISOR

- Review and understand all Safe Work Practices applicable to the performance of the work being performed by Govan Brown Employees and Subcontractors.
- Ensure employees have been trained to all Safe Work Practices applicable to their work.
- Ensure subcontractor provide and adhere to Safe Work Practices requirements based on their own health and safety program.
- Ensure through observation and inspection that work is performed in compliance with Safe Work Practices.
- Provide feedback to management to assist in the development and maintenance of Safe Work Practices.

### WORKERS

- Review and understand all Safe Work Practices applicable to the performance of their work.
- Participate in the development, training and revisions of Safe Work Practices applicable to their work.
- Communicate any discrepancies, further editing, or any changes to the Safe Work Practices that apply to their work.
- Perform work in compliance with approved Safe Work Practices.

### CONTRACTOR/SUBCONTRACTOR

- Review and understand all Safe Work Practices applicable to the performance of their work.
- Provide developed and revised Safe Work Practices applicable to their work to management for review /approval.
- Communicate any discrepancies, further editing, or any changes to the Safe Work Practices that apply to their work.
- Train workers to perform work in accordance with documented Safe Work Practices.
- Perform work in compliance with approved Safe Work Practices.
- Observe performance of work to ensure compliance with Safe Work Practices.
- Recommend changes/improvement to Safe Work Practices as appropriate.

## PROCEDURE

- An important step in the analysis process is that of prioritizing the identified and assessed hazards. An event that could result in immediate or obvious threat to life or health should be assigned the highest priorities. In this case, the controls should be implemented prior to work commenced or the work associated with this hazard would be stopped until controls could be implemented. All corrective actions and controls resulting from the risk assessment are meant to mitigate hazard, to minimize injury, to reduce adverse health effects and property damage.
- Govan Brown in consultation with workers and or workers H&S representatives will conduct a hazard assessment and through the hazard assessment process, tasks will be identified, and hazards that arise out of the job processes or methods used within the workplace will be assessed and risk level rated.
- Govan Brown will consider applicable health and safety legislation, associated standards and guidelines including manufacturer's instructions during the job planning, hazard assessment process as well as while developing appropriate controls and will ensure that all copies of relevant legislation are readily available at each workplace, as required.
- In addition Govan Brown could utilize other appropriate internal workplace parties' input or external subject matter expertise while developing appropriate controls and arrangements through consultation with industry experts and specialists with extensive knowledge of specific disciplines, including but not limited additional technical support, engineering expertise, maintenance /suppliers/manufacturer recommendations or H&S professional advisory and consultation with regional/local authority in order to elaborate adequate control measures on safety-related issues as required.
- Technically feasible and reasonably achievable hazards and risk control measures will be developed in consultation and cooperation with workers and or workers H&S representatives as well as with involvement of both management and workers based on decision-making concept with ALARA (As Low As Reasonably Achievable) principles and applied through the hierarchy of controls at the source (where the hazard "comes from"); along the path (where the hazard "travels"); at the worker as follow:
  - **Elimination:** removal the hazard from the workplace.
  - **Substitution:** substitution (replacement) hazardous materials or machines with less hazardous ones or reducing the exposure.
  - **Engineering Controls:** designs or modifications to plants, equipment, systems, and processes that reduce the source of exposure and /or create the barrier along the path and physically keep the worker from coming into contact with the hazard.
  - **Administrative Controls:** controls that alter the way the work is done, including timing of work, policies and other rules, and work practices/ procedures such as standards and operating procedures.
  - **Personal Protective Equipment:** provided protective equipment to be worn by individuals to reduce exposure to identified hazards.
- Common tasks which pose a moderate to high level of risk will require the creation of a Safe Work Practice.
- Management in consultation with workers and or workers H&S representatives will elaborate required Safe Work Practices based on outcomes from hazard assessment process, incident investigation corrective actions, recommendations, inspections and observations utilizing information obtained from recognized safety associations, product manufacturers, legislation, codes, CSA standards, and other industry recognized sources.
- Developed and formalized controls arrangements including Safe Work Practices will be combined as index of Safe Work Practices utilizing company standardized specific form which include but not limited:
  - Company standard logo and letterhead layout with relevant headers and footers
  - Name and number of Safe Work Practices (if applicable)
  - Main hazards, PPE guidelines, and steps for safe operation including hazard controls / safe work methods
- Finalized controls arrangements including index of Safe Work Practices will be documented and approved by Management as part of periodical review and monitoring process and or at least on annual bases. Any revisions and updates to index of Safe Work Practices versions will be tracked and coordinated through established company Document Control protocol.
- Safe Work Practices will be documented, approved and kept readily available at all workplaces and located where workers have easy access to them.

- Management will communicate, provide review and training on applicable controls and Safe Work Practices with all supervisors and workers during safety meetings and general site orientation as well as will communicate control measures and Safe Work Practices to affected workplace parties.
- Supervisors will review applicable Safe Work Practices with workers in their charge during toolbox talks and safety meetings as well as during Job Hazard Analysis / Assessment (JHA) and site orientation.
- Workers will work in compliance with established Safe Work Practices.
- Subcontractor will provide applicable Safe Work Practices to Govan Brown for review /approval and perform work in compliance with approved Safe Work Practices.
- Management and supervisors will observe/inspect the performance of work to ensure it compliance with established Safe Work Practices.
- Where workers are found to be performing work in a manner which is unsafe and inconsistent with established Safe Work Practices, supervisors will retrain and/or take corrective action as appropriate.
- Govan Brown will review Safe Work Practices annually and will maintain an index of Safe Work Practices to ensure they remain accurate, legally compliant, and efficient and closely reflect the work activities.

## **COMMUNICATION**

- This procedure will be communicated to all new hired employees through new employee general orientation or site-specific induction and/ or through periodic management and staff safety meetings or toolbox talk meetings.
- The procedure will be communicated to all existing employees through the OHS Program / Occupational Health and Safety Management System (OHSMS) orientation and /or through Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC)/Joint Occupational Health and Safety Committee (JOHSC) communication and periodic management and staff safety meetings as well as through periodic and ongoing safety training, internal communication protocols or structured training sessions.
- Safe Work Practices will be made available at the point of use to workers, subcontractors, and suppliers upon request.

## **TRAINING**

- All new employees will receive awareness training as part of their orientation on their specific health and safety roles and responsibilities through the new hire orientation process.
- All existing employees will receive training on their health and safety roles and responsibilities through periodic staff OHS Program / Occupational Health and Safety Management System (OHSMS) orientation safety meetings as well as through periodic and ongoing safety training or structured training sessions.
- Verification of training will be confirmed via sign off and may include knowledge verification testing.

## **EVALUATION**

- This procedure will be reviewed on annual basis by Senior Management and /or during the annual OHS Program / Occupational Health and Safety Management System (OHSMS) internal audit and maybe changed due to business needs, any legal requirements and based on the results of the evaluation to ensure it continues to meet OHS regulation and standards and to ensure it is relevant with current operations and any changes will be indicated in the meetings minutes or reflected on the revision page.
- The Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) and management will also be involved with the evaluation by analyzing forwarded items of concern and suggesting corrective action.
- On a yearly basis, management will review OHS Program / Occupational Health and Safety Management System (OHSMS) to assess whether it is still compliant with current regulations and with the current work environment. If necessary and if required procedure will be amended to reflect the current operation.
- After the year-end audit a thorough analysis of the gaps identified will be conducted by the Internal Auditor & Senior Management will develop an action plan that addresses the deficiencies with an overall goal of continual improvement.
- Senior Management at least annually or more often as required should review and validate company Document Control Master List with indication supporting documents needed to implement, monitor and maintain active OHS Program / Occupational Health and Safety Management System (OHSMS) effectively and assess conformance with business, corporate and legal requirements as well as compliance with applicable standards.

- Document Controller or Designee will coordinate and manage Document Control Register to ensure changes to, and current versions status of, documents are identified and tracked in order to prevent the unintended use of obsolete documents and identify such documents if they are retained for any purpose

**REFERENCES**

Occupational Health and Safety Act R.S.O. 1990

OHS Program / Occupational Health and Safety Management System (OHSMS)

Document Control Master List

Document Control Register

Occupational Health & Safety Risk Registry (OHS RR)

Construction Hazard Assessment (CHA)

Job Hazard Analysis / Assessment (JHA)

Addendum: Subcontractor Safety Package

Addendum: Index of Safe Work Practices (SWP)

Worker Feedback Form

List of Applicable Legislation

## SAFE JOB PROCEDURES (SJP) PROCEDURE

### PURPOSE

The purpose of a Safe Job Procedure (SJP) is to provide guidelines and written methods with a series of specific steps in chronological order from start to finish for each company activity rated as a moderate to major hazard to mitigate risk by minimizing potential exposure to hazards associated with each identified task.

Safe Job Procedures are also a training aid, used to provide workers with a written set of instructions for the safe performance of particular work.

### SCOPE

Safe Job Procedures will be developed by Govan Brown for all routine/non-routine tasks which present a moderate to high level of risk to health and safety. Govan Brown may request from the subcontractor written Safe Job Procedures for hazardous work being conducted that exceeds the general scope of work being performed. Safe Job Procedures will also be developed as a result of day-to-day safety initiatives including Hazard Assessments, incident investigation and/or as a supplement to a safe job procedure.

All employees will perform work in a manner consistent with the Safe Job Procedure, as appropriate.

## ROLES AND RESPONSIBILITIES

### SENIOR MANAGEMENT

- Conduct a Hazard Assessment to determine risk level of all routine/non-routine and critical tasks threshold.
- Elaborate Safe Job Procedures for all routine/non-routine tasks and critical tasks which present a moderate to high level of risk of injury, occupational illness, or damage as a result of a Hazard Assessment, accident investigation and/or as a supplement to a Safe Work Practice.
- Encourage workers to participate in the developing of Safe Job Procedures and identify employees qualified to assist in the development of Safe Job Procedures.
- Ensure Safe Job Procedures are documented, approved and readily available at all workplaces and located where workers have easy access to them.
- Train supervisors to this Program and all Safe Job Procedures appropriate to their work.
- Ensure through observation and inspection that work is performed in compliance with Safe Job Procedures.
- Review Safe Job Procedures annually to ensure they remain accurate, legally compliant, and efficient.
- Ensure subcontractors provide and adhere to Safe Job Procedures requirements based on their own health and safety program.

### SUPERVISOR

- Assist management in the elaboration of Safe Job Procedures.
- Review and understand all Safe Job Procedures applicable to the performance of the work being performed by Govan Brown Employees and Subcontractors.
- Train workers to perform work in accordance with documented Safe Job Procedures.
- Ensure through observation and inspection that work is performed in compliance with Safe Job Procedures.
- Ensure subcontractors provide and adhere to Safe Job Procedures requirements based on their own health and safety program.
- Recommend changes/advise on improvement to Safe Job Procedures as appropriate.
- Provide feedback to management to assist in the development and maintenance of Safe Job Procedures.

### WORKERS

- Review and understand all Safe Job Procedures applicable to the performance of their work.
- Participate in the development, training and revisions of Safe Job Procedures applicable to their work.
- Communicate any discrepancies, further editing, or any changes to the Safe Job Procedures that apply to their work.
- Perform work in compliance with approved Safe Job Procedures.

### CONTRACTOR/SUBCONTRACTOR

- Review and understand all Safe Job Procedures applicable to the performance of their work.
- Provide developed and revised Safe Job Procedures applicable to their work to management for review /approval.
- Communicate any discrepancies, further editing, or any changes to the Safe Job Procedures that apply to their work.
- Train workers to perform work in accordance with documented Safe Job Procedures.
- Perform work in compliance with approved Safe Job Procedures.
- Observe performance of work to ensure compliance with Safe Job Procedures.
- Recommend changes/improvement to Safe Job Procedures as appropriate.



## PROCEDURE

- Govan Brown will conduct a hazard assessment and identify tasks and hazards that arise out of the job processes or methods used within the workplace and evaluate the risk level of all routine/non-routine and critical tasks threshold. An event that could result in immediate or obvious threat to life or health should be assigned the highest priorities and controls should be implemented prior to work commenced or the work associated with this hazard would be stopped until controls could be implemented.
- Govan Brown in consultation with workers and or workers H&S representatives will conduct a hazard assessment and through the hazard assessment process, tasks will be identified, and hazards that arise out of the job processes or methods used within the workplace will be assessed and risk level rated.
- Govan Brown will consider applicable health and safety legislation, associated standards and guidelines including manufacturer's instructions during the job planning, hazard assessment process as well as while developing appropriate controls and will ensure that all copies of relevant legislation are readily available at each workplace, as required.
- In addition Govan Brown could utilize other appropriate internal workplace parties' input or external subject matter expertise while developing appropriate controls and arrangements through consultation with industry experts and specialists with extensive knowledge of specific disciplines, including but not limited additional technical support, engineering expertise, maintenance /suppliers/manufacturer recommendations or H&S professional advisory and consultation with regional/local authority in order to elaborate adequate control measures on safety-related issues as required.
- Technically feasible and reasonably achievable hazards and risk control measures will be developed in consultation and cooperation with workers and or workers H&S representatives as well as with involvement of both management and workers based on decision-making concept with ALARA (As Low As Reasonably Achievable) principles and applied through the hierarchy of controls at the source (where the hazard "comes from"); along the path (where the hazard "travels"); at the worker as follow:
  - **Elimination:** removal the hazard from the workplace.
  - **Substitution:** substitution (replacement) hazardous materials or machines with less hazardous ones or reducing the exposure.
  - **Engineering Controls:** designs or modifications to plants, equipment, systems, and processes that reduce the source of exposure and /or create the barrier along the path.
  - **Administrative Controls:** controls that alter the way the work is done, including timing of work, policies and other rules, and work practices/ procedures such as standards and operating procedures.
  - **Personal Protective Equipment:** provided protective equipment to be worn by individuals to reduce exposure to identified hazards.
- Management will elaborate required Safe Job Procedures at minimum for critical tasks which present a moderate to high level of risk based on outcomes from hazard assessment process, incident investigation corrective actions, recommendations, inspections and observations utilizing information obtained from recognized safety associations, product manufacturers, legislation, codes, CSA standards, and other industry recognized sources.
- Management will create an index of required Safe Job Procedures and/or as a supplement to a Safe Work Practice based on consultation with workers and input from workforce who will actually be doing and/or supervising the work.
- Developed and formalized controls arrangements including Safe Job Procedures will be combined as index of Safe Job Procedures utilizing company standardized specific form which include but not limited:
  - Company standard logo and letterhead layout with relevant headers and footers
  - Name and number of Safe Job Procedures (if applicable)
  - Main hazards, PPE guidelines, and steps for safe operation including hazard controls / safe work methods
- Finalized controls arrangements including index of Safe Job Procedures will be documented and approved by Management as part of periodical review and monitoring process and or at least on annual bases. Any revisions and updates to index of Safe Job Procedures versions will be tracked and coordinated through established company Document Control protocol.
- Safe Job Procedures will be documented, approved and kept readily available at all workplaces and located where workers have easy access to them.

- Management will communicate, provide review and training on applicable controls and Safe Job Procedures with all supervisors and workers during safety meetings and general site orientation as well as will communicate control measures to affected workplace parties.
- Supervisors will review applicable Safe Job Procedures with workers in their charge during toolbox talks and safety meetings as well as during Job Hazard Analysis / Assessment (JHA) and site orientation.
- Workers will work in compliance with established Safe Job Procedures.
- Subcontractor will provide applicable Safe Job Procedures to Govan Brown for review /approval and perform work in compliance with approved Safe Job Procedures.
- Management and supervisors will observe/inspect the performance of work to ensure it compliance with established Safe Job Procedures.
- Where workers are found to be performing work in a manner which is unsafe and inconsistent with established Safe Job Procedures, supervisors will retrain and/or take corrective action as appropriate.
- Govan Brown will review Safe Job Procedures annually and will maintain an index of Safe Job Procedures to ensure they remain accurate, legally compliant, and efficient and closely reflect the work activities.

## **COMMUNICATION**

- This procedure will be communicated to all new hired employees through new employee general orientation or site-specific induction and/ or through periodic management and staff safety meetings or toolbox talk meetings.
- The procedure will be communicated to all existing employees through the OHS Program / Occupational Health and Safety Management System (OHSMS) orientation and /or through Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) communication and periodic management and staff safety meetings as well as through periodic and ongoing safety training, internal communication protocols or structured training sessions.
- Safe Job Procedures will be made available at the point of use to workers, subcontractors and suppliers upon request.

## **TRAINING**

- All new employees will receive awareness training as part of their orientation on their specific health and safety roles and responsibilities through the new hire orientation process.
- All existing employees will receive training on their health and safety roles and responsibilities through periodic staff OHS Program / Occupational Health and Safety Management System (OHSMS) orientation safety meetings as well as through periodic and ongoing safety training or structured training sessions.
- Verification of training will be confirmed via sign off and may include knowledge verification testing.

## **EVALUATION**

- This procedure will be reviewed on annual basis by Senior Management and /or during the annual OHS Program / Occupational Health and Safety Management System (OHSMS) internal audit and maybe changed due to business needs, any legal requirements and based on the results of the evaluation to ensure it continues to meet OHS regulation and standards and to ensure it is relevant with current operations and any changes will be indicated in the meetings minutes or reflected on the revision page.
- The Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) and management will also be involved with the evaluation by analyzing forwarded items of concern and suggesting corrective action.
- On a yearly basis, management will review OHS Program / Occupational Health and Safety Management System (OHSMS) to assess whether it is still compliant with current regulations and with the current work environment. If necessary and if required procedure will be amended to reflect the current operation.
- After the year-end audit a thorough analysis of the gaps identified will be conducted by the Internal Auditor & Senior Management will develop an action plan that addresses the deficiencies with an overall goal of continual improvement.
- Senior Management at least annually or more often as required should review and validate company Document Control Master List with indication supporting documents needed to implement, monitor and maintain active OHS Program / Occupational Health and Safety Management System (OHSMS) effectively and assess conformance with business, corporate and legal requirements as well as compliance with applicable standards.
- Document Controller or Designee will coordinate and manage Document Control Register to ensure changes to, and current versions status of, documents are identified and tracked in order to prevent the unintended use of obsolete documents and identify such documents if they are retained for any purpose

**REFERENCES**

Occupational Health and Safety Act R.S.O. 1990  
OHS Program / Occupational Health and Safety Management System (OHSMS)  
Document Control Master List  
Document Control Register  
Occupational Health & Safety Risk Registry (OHS RR)  
Construction Hazard Assessment (CHA)  
Job Hazard Analysis / Assessment (JHA)  
Addendum: Subcontractor Safety Package  
Addendum: Index of Safe Job Procedures (SJP)  
Worker Feedback Form  
List of Applicable Legislation

## PROCUREMENT AND CONTRACTOR MANAGEMENT POLICY STATEMENT

Govan Brown Associates Limited's senior management is vitally interested in the health, safety, and protection of our workers from workplace injury, occupational illness or loss and dedicated to work collaboratively with vendors/ suppliers and contractor workers in the development, implementation, monitoring and continuous improvement of our Occupational Health & Safety Management System.

Govan Brown Associates Limited is committed and fully supports the ongoing and proactive identification of health and safety hazards, assessment of the associated or potential risks with identification and implementation technically feasible and reasonably achievable control measure to mitigate the risks through the prequalification, selection, monitoring, evaluation, administration of the health and safety capability and performance of vendors/ suppliers and contractors, and address the non-compliance with regards to this policy and procedure.

Govan Brown Associates Limited corporate vision within the scope of Occupational Health & Safety Management System based on concept that procurement and sourcing from vendors, suppliers and contractors that have proven their due compliance with adequate health and safety standards, government regulations and corporate policies can mitigate operational health and safety risks and prevent workplace injuries, reduce adverse health effects and property damage.

Govan Brown Associates Limited vendors/ suppliers and contractors have to be:

- Trusted;
- Treated with fairness in a partnership;
- Given full information to meet the demands being placed on them.

Govan Brown Associates Limited procurement and contractor management policy and procedures aims to ensure that risks are minimized and do not introduce any uncontrolled hazards, when vendors/ suppliers and contractors are engaged, by diligent application of proven standards of risk management policies, work processes, systems, and procedures which fully integrate health and safety evaluation, planning and design.

Govan Brown Associates Limited requires all contractors to commit to and abide by these standards to maintain superior levels of health, and safety performance and it is imperative that Govan Brown Associates Limited management and all contractor management and supervision demonstrate their sustained commitment to this policy in a visible and vigorous manner.

The Procurement and Contractor Management Policy and Procedure will be reviewed by Govan Brown Associates Limited senior management at least annually or more frequently as required.

Senior management will ensure that hazard assessments are developed maintained and updated when required, to reflect process changes and re-approved as appropriate using a team-based approach which will include the involvement of workers and/or workers Health and Safety representatives, joint health and safety committees, supervisors and management with additional technical support, engineering expertise, maintenance / vendors/ suppliers and contractors input as required.

All employees will be informed of the hazards and control strategies that pertain to operational activity when vendors/ suppliers and contractors are engaged will be communicated accordingly and records of communication and/or training on hazard assessments be retained as required.



Colin Gray

President – Govan Brown Associates Limited

March 22/24

Date

## PROCUREMENT AND CONTRACTOR MANAGEMENT PROGRAM & PROCEDURE

### PURPOSE

Govan Brown developed this procedure to define the requirements and provide guidelines for the prequalification, selection, monitoring, evaluation, and administration of the health and safety capability of vendors/ suppliers and contractor as part of procurement and contractor management within the scope of GB OHS Program / Occupational Health and Safety Management System (OHSMS).

The objectives of this guideline are to ensure the health and safety of workers, prevent loss to property and maintain compliance with all rules and regulations.

### SCOPE

This procedure is applied to all GB employees and all documented information within the scope of GB OHS Program / Occupational Health and Safety Management System (OHSMS) including the documents and records created by GB internally and/or the documentation and records of external origin.

This procedure does not apply to documents, records and documented information regarding the finance, accounting, general and legal affairs.

### DEFINITIONS

**Senior management:** executives at the highest level of an organization with responsibility for corporate governance, corporate strategy, and the interests of all the organization's stakeholders.

**Middle Management:** 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.

**Supervisor:** a competent person who administers and/or supervises the affairs of a department or division at the level below senior management of the company or organization and who is in charge of a workplace or has authority over a worker(s) during their day-to-day work.

**Worker:** (Employee, Co-op Students) is defined as a competent individual, who performs work or supplies services for a monetary/non-monetary compensation. Workers do not have management or supervisor responsibilities.

**Competent person** (according to OHSA) means a person who (a) is qualified because of their knowledge, training and experience to organize the work and its performance; (b) is familiar with the provisions of this Act and the regulations that apply to the work, and (c) has knowledge of any potential or actual danger to health and safety in the workplace

**Health and Safety Representative (HSR)** means a health and safety representative elected or selected by the workers under the Occupational Health and Safety Act (OHSA)

**Joint Health and Safety Committee (JHSC) / Joint Occupational Health and Safety Committee (JOHSC)** is advisory group and forum for bringing the internal responsibility system into practice. The committee is made up of management and worker representatives who meet on a regular basis and work together to identify workplace health and safety problems, provide recommended solutions and further assist in dealing with workplace health and safety issues and improving workplace health and safety conditions.

**Contractor** means any worker or group of workers who perform work at the project or on Govan Brown premises for which Govan Brown compensate the worker or group of workers and are not compensated for that work through Govan Brown organization's payroll in accordance with agreed upon specification, terms and conditions.

**Subcontractor** means a person who takes a portion of a contract from the principal contractor or from another sub-contractor.

**Vendor** means a person or organisation purchases products from manufacturers or distributors and provides goods or services of experience to another entity.

**Supplier** means a person or organisation that makes goods and services of experience available to another entity and provides goods and services, needed by the entities in carrying on business.

## **ROLES AND RESPONSIBILITIES**

### **MANAGEMENT**

- Prepare written Procurement and Contractor Management policy with distinct statement and ensure it is reviewed at least annually, dated and signed by senior management.
- Develop a procedure to implement the Procurement and Contractor Management policy and relevant support protocols when vendors/ suppliers and contractors are engaged in GB operations and provide leadership, motivation, and resources necessary to support procurement and contractor management process.
- Plan and implement the overall supply chain strategy and ensure the requirements for a contractor health and safety program are determined through a risk analysis that will measure the job requirements against contractor capabilities.
- Establish, maintain and update as required, the occupational health and safety criteria for selecting, monitoring, evaluating, and addressing non-compliance for contractor/service providers and advise on OHS performance expectation prior to the award of contract.
- Actively support and participate in pre-qualification review of contractors to ensure that they are competent, licensed, qualified, and experienced as required
- Ensure specific health and safety issues addressed with the identification of foreseeable hazards and assessment of the risks involved, and the adoption of suitable control measures to eliminate or reduce those risks when vendors/ suppliers and contractors are engaged in GB operations.
- Ensure effective ongoing communication and coordination between appropriate levels of the organization and the contractor, including communication of hazards and risk, and measures to be taken to prevent and control them.
- Establish and communicate relevant workplace health and safety hazard awareness and training requirements for contractor before commencing work and as work progresses, as necessary.
- Ensure adequate arrangements implemented for the identification and elimination of hazards and the assessment and control of the risk to the organization's workers arising from the contractor's activities and materials.
- Lead and coordinate OHS Program / Occupational Health and Safety Management System (OHSMS) on multi-employer or multi-contractor worksites as required.
- Assign a knowledgeable, trained and competent employee direct responsibility for management and oversight of each contract prior to signing and awarding a contract.
- Assist contractors in administering programs that are consistent with Govan Brown's expectations, minimum requirements and applicable regulations.
- Take reasonable precautions to protect both Govan Brown and contractor's personnel from workplace injuries and illness as well as from losses associated with the incidents, while preserving the independent contractor relationship.

### **SUPERVISOR**

- Support Procurement and Contractor Management policy and relevant s protocols and provide assistance where required;
- Ensure Procurement and Contractor Management procedures and protocols monitored and reviewed in the light of the particular circumstances applying in their working areas.
- Ensure safe systems of work are implemented for all working procedures, and practices are properly documented and are adhered to.
- Ensure appropriate safety equipment is supplied, properly maintained and used at all times.
- Ensure all workers are adequately trained and competent to carry out the work allotted to them without risk.
- Ensure no activities carried out by company workers will create a risk or hazard to other workers, to property, to customers or to visitors and the general public.
- Ensure no operation carried out by contractors will place workers or members of the public at risk.
- Ensure all necessary arrangements are made and maintained in respect of accident reporting, first aid, fire precautions, etc.
- Ensure all accidents and dangerous occurrences are fully investigated and preventive actions are recommended in close liaison with the Govan Brown management and Health & Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC)

- Ensure all relevant legal records are regularly maintained and inspected.
- Ensure where health and safety training needs are identified, arrangements for training are made as appropriate.
- Lead the hazard assessment process by ensuring that hazard assessments are completed, documented, and reviewed for all operations and activities.
- Communicate hazards and controls identified on the hazard assessments (i.e., through safety meetings, site safety plan, orientation, training sessions, site specific hazard assessments).
- Ensure workers understand, review, and sign off on the hazard assessments and ensure that controls are developed and implemented for identified hazards in a timely manner.
- To ensure that all workers/subcontractors are trained with regard to the procedural framework as part of Govan Brown Hazard Assessment, Analysis and Control Policy.
- Conduct a hazard risk assessment for job duty with the Health & Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) / Joint Occupational Health and Safety Committee (JOHSC) Member and worker participation in a timely manner as identified.
- Assist management to implement the action plan to mitigate identified hazard risk factors and follow up on implementation.

#### **HEALTH & SAFETY REPRESENTATIVE / JOINT HEALTH & SAFETY COMMITTEE MEMBER**

- To work with supervisors and management to identify and control hazards in the workplace through the hazard assessment process.
- To participate in the development of hazard assessments and follow established safe work practices and safe job procedures.
- To participate in review existing job description and physical demands analysis with the site manager and supervisor.
- To immediately implement any possible controls to mitigate against risk based on risk rating level.
- To assist management to implement the action plan to mitigate identified hazard risk factors.
- To forward any hazard reports to management.
- To understand, review, and sign off on hazard assessments given by management or supervisor.
- To follow hazard control measures identified for their work.
- To review each hazard risk assessment with the supervisor and site manager.

#### **WORKERS**

- All workers are required to participate cooperatively with the hazard risk assessment process in the workplace.
- Workers are required to review each hazard risk assessment provided to them by management and to ensure to follow the identified safe work procedures to mitigate against identified hazards of the workplace and job duties.
- Workers are required to comply and follow identified safe work procedures.
- Report and or document any actual and potential hazards in the workplace

#### **VENDOR/SUPPLIER**

- Ensure that goods and products are so designed and constructed as to be reasonably safe and without risks to health at all relevant times during use, maintenance, cleaning at work.
- Carry out a reasonable amount of product testing to ensure that goods and products are indeed safe.
- Make sure that supplied goods or products are provided with adequate information about the safe and proper use of it, including its limitations.
- Keep those supplied with the supplied goods and products up-to-date if additional risks associated with it become known.
- Ensure, as far as is reasonably practicable, that any goods and products supplied by it to any owner, contractor, employer, worker for use is safe when used in accordance with the instructions provided by it.
- Provide written instruction respecting the safe use of goods and products or equipment that's supplied.
- Ensure any supplied harmful substance is safe to use when used in accordance with the manufacture's specifications and employers, where the equipment was supplied, are aware if equipment or harmful substances or explosives do not comply with a standard.

- Ensure proper maintenance of equipment if the supplier has a maintenance agreement in place and in compliance with appropriate standards (for example: Canadian Standards Associations and the American Society for Testing and Materials (ASTM)).
- Comply with the OHS legislation and cooperate with any person exercising a duty under the OHS legislation.

**CONTRACTOR / SUBCONTRACTOR / SERVICE PROVIDER**

All contractors/subcontractors/service provider shall be made aware of our Occupational Health and Safety Program rules and regulations. The Contractor/Subcontractor/Service Provider managers and/or supervisor shall be responsible for the direct supervision and safety of the contractor/subcontractor/service provider and their crew. They are accountable for the performance of personnel through the safe work practices and procedures as well as any other applicable Acts and Regulations. It is the contractor/subcontractor/service provider's responsibility to perform the job/services in compliance with our safety standards or other applicable legislation.

Any infractions not immediately corrected as directed by Govan Brown will result in the contractors/subcontractors/service providers being advised of the breach of contract and the action that will be taken as a result of the breach according to company policy. It must be firmly established that our safety program protects all workers on the job, including all contractor/subcontractor/service provider's employees.

All contractor/subcontractors must:

- Ensure that Hazard Recognition and Risk Assessment process applies to all routine and non-routine operations conducted by contractor/subcontractor/service provider which will also include the human factors where and how work is performed.
- Ensure that hazard assessment is conducted by competent person and or team of competent individuals who in addition to technical, scientific and legal knowledge as well as a good working experience and familiarity with the situational awareness and work to be studied/assess
- Ensure that actual and potential hazards for all contractor/subcontractor/service provider operations identified and evaluated with hazard assessment completed:
  - o prior to the start of a new task,
  - o when equipment, materials, substances, or processes are introduced or changed,
  - o when a change to the management system may impact workplace operations or activities
  - o when it is a legislative compliance requirement
- Ensure that ongoing and proactive identification of occupational health and safety hazards, assessment of the risks posed by the hazards, and development and implementation of controls to mitigate the risks are based on using a team-based approach that, at the very least, involves participation from workers and/or involvement from workers' health and safety representatives/joint health and safety committees and management.
- Ensure hazard assessments are reviewed in the event of doubt or where there are changes to the information or circumstances which would invalidate the original assumptions used or when critical factors and number of circumstances will require the reassessment and review of relevant risks
- Read and understand our company Health & Safety Program. Must be knowledgeable of and comply with all regulations, laws and codes.
- Ensure all his/her employees complete a company orientation when/where required prior to his/her employees working on site.
- Enforce all established safety regulations and work methods. Take disciplinary action necessary to ensure compliance with the rules.
- Ensure that a trade safety representative will attend regular Site Safety Meetings.
- Conduct regular inspections for unsafe practices and conditions and ensure prompt corrective action to eliminate causes of accidents and "near misses".
- Complete an accident/incident report ensuring all accidents/incidents are investigated and corrective action is taken to prevent re-occurrence. Copies of the report are given to the Govan Brown Manager/Supervisor
- Inform each employee of the hazards associated with his/her job and provides the training in the safe work practices required to perform his/her job safely.
- Impart to each employee an understanding that violation of established safety rules will not be tolerated.
- Ensure that required safety equipment and PPE are provided and used for each job.
- Observe new hire employees closely until confident of workers ability to perform assigned duties safely.



## **PROCEDURE**

### **PROCUREMENT**

Govan Brown will conduct research, assess and maintain supply chain arrangements with closer relationship between designers, principal contractors and suppliers of services and products to ensure result not only in a safer finished product but, also in construction, a safer method of assembly and handling on site or workplace.

Where possible and based on consultation with vendors/supplier Govan Brown will make necessary arrangements to ensure more products are preassembled in ideal factory conditions and then fixed in place on site as it is often safer than utilizing a full assembly on site.

Govan Brown will encourage the consideration of overall best value in the procurement of goods and services which include evaluation the relevant financial and non-financial factors and information prior to commencing competitive processes.

Govan Brown will select the vendor/supplier that offers the best value consistent with the required quality and service within approved budgets except in case of emergencies, which has to be approved by the senior management.

Factors that shall be considered in determining best value should include, but are not limited to:

- Price, including delivery and implementation or set up costs;
- Operating costs, including maintenance and life cycle costs;
- Salvage value and disposal costs;
- Availability and timeliness of delivery with after sale services, including availability of parts/supplies;
- Quality, serviceability and warranties;
- Vendor experience, expertise, capacity, and capability to meet predefined requirements;
- References regarding past performance from other customers of the vendor and the previous experience with the vendor/supplier;
- Value adds benefits to the Govan Brown;
- Contributions to the local economy through supporting businesses and creation of job opportunities;
- Environmental, health and safety factors and ethical impacts of producing the goods and services, and the goods and services themselves.

Govan Brown will ensure that hazards and risk are addressed in the design or purchasing phases, thus eliminating the need for retrofit or control measures after the item is delivered. This assessment will be conducted for any new product or equipment, taking into account the likely life expectancy including delivery, installation, use, cleaning, maintenance and disposal through the consultation with vendor/supplier.

The vendor / supplier should be able to provide the information needed to do this and this will help Govan Brown as the purchaser make an informed decision on the total costs because the risks will have been identified as will the precautions needed to control those risks.

Govan Brown will ensure when procuring product and equipment that it is safe and suitable for its purpose and complies with the relevant legislation. This applies equally to equipment which is adapted to be used in ways for which it was not originally designed.

When selecting work equipment, Govan Brown will:

- consider existing working conditions and health and safety issues.
- provide adequate health and safety information, instructions, training and supervision for operators.
- ensure that manufacturers and suppliers providing information that will enable safe use of the equipment, substances and without risk to health.

In addition, Govan Brown will consider other aspects when buying in product or equipment including but not limited:

- Documentation on safe use and handling of machinery and equipment, such as manufacturer's safe use instructions;
- WHMIS supplier labels, Safety Data Sheets, storage and handling precautions;
- Specific manufacturer's technical information on emissions (noise levels, vibration, heat, voltage, guards or limitation of operations);
- Govan Brown OHS requirements;
- Hazardous materials with provision of extraction equipment or PPE;
- Ergonomic, manual handling needs, access/egress and human factors;

- Training associated with the use of purchased products, supplies, and equipment;
- Handling and disposal of purchased products, supplies, and equipment after use;
- Risk to contractors when decommissioning old equipment or installing new equipment;
- Any requirements in law, codes, or industry standards.

Procurement of a recurrent nature, i.e., where the same goods and services may be issued several times a year, one vendor may be selected for a period of up to one year. In some cases, particularly for services, contracts for the goods or services can be drawn up once, which may then be reference every time those goods or services are required without requiring separate quotations and contracts on each occasion. In other cases, particularly for regularly purchased goods, vendors can be selected once, but separate contracts drawn-up on each occasion the vendors are used.

The procurement process cannot be completed without certification that the goods and services procured have been received entirely to Govan Brown satisfaction, in particular, to the satisfaction of the requisition.

The procedure for receiving goods and services is therefore important in ensuring that vendors have entirely met their obligations. Once Govan Brown has certified that goods and services have been received to their satisfaction, it has little further resources to complain about a vendor's performance; and payment can then be made.

In all cases, the certification of receipts of goods and services is pre-requisite to Govan Brown and the following guidelines are essential for that purpose.

Govan Brown should ensure that goods and services are checked against contracts, waybills, invoices, or delivery notes.

Govan Brown at the time of delivery will facilitate the receiving and checking of goods and services whereby the receiving person will have to sign the delivery notes or any other documents during delivery.

In some cases, receiving of goods and physical checking of goods or services may be delegated to other Govan Brown representatives who are so authorized by the procurement officer. Such might include cases where goods of services are delivered directly to a project field location; or where specialist's technical certification is required.

Any differences between documents done physical checks should be noted and reported to the Govan Brown procurement authority for action.

Govan Brown will ensure that hazard assessments are developed maintained and updated when required, to reflect process changes and re-approved as appropriate using a team-based approach which will include the involvement of workers and/or workers Health and Safety representatives, joint health and safety committees, supervisors and management with additional technical support, engineering expertise, maintenance / vendors/ suppliers and contractors input as required.

All employees will be informed of the hazards and control strategies that pertain to operational activity when vendors/ suppliers and contractors are engaged will be communicated accordingly and records of communication and/or training on hazard assessments be retained as required.

## **CONTRACTOR MANAGEMENT**

Contractors, their employees, sub-contractors and their employees, should not be allowed to commence work on any Govan Brown's site without authorization signed by the company contact.

Govan Brown management will develop and communicate the contractual scope of work to be executed with clear minimum OHS requirements and identification any site specific or scope related risks, including risks when multiple contractors will be working together on the same scope or site, and share these with the contractors within the pre-qualification / tender documentation.

Govan Brown OHS criteria for selecting, monitoring and evaluating contractor/service providers also include but not limited the requirements to:

- Ensure that hazard assessment is conducted by competent person and or team of competent individuals who in addition to technical, scientific and legal knowledge as well as a good working experience and familiarity with the situational awareness and work to being studied/assess at least possess the following:
  - o Knowledge of the hazards and risks associated with the tasks for the operations and activities including routine and non-routine tasks, and human factors where work is performed.
  - o Demonstrated understanding and working knowledge of the hierarchy of controls and implementing control measures associated with the hazards and risks
  - o Training, skills and experience with regard to the hazard's recognition, risks evaluation and elaboration of associated control measures
  - o Aptitudes, such as skillset, ability and willingness to deal with the hazards, risks and control measures

- Conduct hazard assessment to identify any additional or potential hazards and assess risks arising from the contractor/subcontractor/service provider 's activities and materials that may impact the organization's workers to ensure adequate hazards and risk control measures effectively implemented in a timely manner through application of hierarchy of controls and further communication of control measures to relevant work parties.
- Participate in hazard assessment to identify any additional or potential hazards and assess risks arising from the client organization activities and materials that may impact the contractor/subcontractor/service provider's workers to ensure adequate hazards and risk control measures effectively implemented in a timely manner through application of hierarchy of controls with further communication to relevant work parties.
- Ensure hazard assessments are reviewed and adequate control measures effectively implemented in a timely manner through application of hierarchy of controls with further communication of control measures and arrangements to relevant work parties. when critical factors and number of circumstances will require the reassessment and review of relevant risks which include but not limited:
  - o A change in legislation.
  - o A change in control measures.
  - o Any significant change in work practices and processes.
  - o Introduction or installation of new machinery and equipment.
  - o When a new phase begins and or
  - o After an investigation if required for a corrective/preventative action.

There may be specific health and safety issues to be addressed depending on the nature of the tasks within identified scope of work where Govan Brown will include requirements and arrangements for the identification of foreseeable hazards and assessment of the risks involved, and the adoption of suitable control measures to eliminate or reduce those risks.

Site or scope related risks may include but not limited:

- Potential hazards and risks for routine and critical tasks identified through Govan Brown hazard assessment, analysis and control process (OHS Risk Registry and CHA)
- Internal and external context and complexity of the work, e.g., level of subcontracting, remote area, harsh environment, importation restrictions, political climate, security, health issues, local content considerations, human rights and social interaction
- Timing and duration of the work and contract schedule
- Experience and historical performance of the contractor/service provider(s)
- Governmental or stakeholder requirements and environmental issues
- Applicable laws and regulations
- Location of the work (client's vs contractor's site)
- Materials, equipment and logistics activities
- Transfer of learnings from previous bids and executed projects

Before entering into a contract and starting any operation or project activities Govan Brown will establish the context and assess the risks based on the initial assessment of the proposed contractual scope of work to broadly determine OSHA arrangements needed to control the risks.

Govan Brown management through the established hazard assessment, analysis and control process will ensure that at planning phase adequate measures implemented for the identification and elimination of hazards and the assessment and control of the risk to the Govan Brown's workers arising from the contractor's activities and materials.

Govan Brown in consultation and participation with Contractor/Service providers management will identify any additional or potential hazards and assess risks arising from the contractor's or client organization activities and materials to ensure technically feasible and reasonably achievable hazards and risk control measures effectively implemented in a timely manner based on decision-making concept with ALARA (As Low As Reasonably Achievable) principles and application of hierarchy of controls. Govan Brown management has in place a process to manage contracted employers. We will evaluate, select, monitor, and address non-compliance or our contracted employers.

Govan Brown management through the pre-qualification assessment with Subcontractor H&S review, execution monitoring and evaluation together with established hazard assessment, analysis and control process will ensure that pre-qualified competent contractors have adequate measures implemented and continuously improving in the identification and elimination of hazards and the assessment and control of risk to contractors and their workers arising from the company's activities and materials;

As part of contractor/service providers pre-qualification assessment and in order to determine contractor/ service providers competency and ability to assess hazards, analyze risks and implement controls Govan Brown will:

- Establish minimum criteria, expectations and levels of competence required by the pre-qualified contractor//service providers.
- Request the contractor /service providers to supply evidence of that competence, e.g., copy of his safety policy, examples of risk assessments, qualifications of staff, worker training records, membership of professional organisation or certified body, use of a professional safety advisor, maintenance and test records for equipment, and system for management of sub-contractors.
- Request the contractor/service providers for names of previous or current clients and check with them on his performance; also for details of accidents, insurance claims, and prosecutions or other enforcement action taken against him and check these out.
- Check confirmation that he has adequate resources (financial, manpower and equipment) to deal with such a contract.
- Supply information regarding the job and the site, including site rules and emergency procedures and communicate Subcontractor Safety Package
- Request contractor/service providers to provide documented evidence as per Subcontractor Health & Safety Review Checklist for further verification by Govan Brown prior to awarding contract or commencing any contractual activity.
- Request the contractor/service providers to provide a documented safe work practices and safe job procedures outlining how he will carry out the job safely.
- Emergency Response Plans and arrangements.

Govan Brown in addition to contractual scope of work will communicate Subcontractor Safety Package with Subcontractor H&S review checklist to all pre-qualified competent contractors/service providers in order to ensure contractors/service providers are able to assess/analyze and control hazards arising from their own work or Govan Brown operations that may impact the Govan Brown's workers or contractors' personnel.

Contractors/service providers that do not have a Health and Safety program, policies, procedures, practices, and/or has a system in place which does not meet the minimum requirement must follow Govan Brown Health and Safety program.

A contractor/service providers who is unable to demonstrate a record of acceptable and continuously improving health and safety performance shall not be awarded a contract without approval of the appropriate Govan Brown senior management.

Govan Brown will lead and coordinate site specific OHS requirements where multiple contractors/service providers will be working on the same job or site through the planning phase with initial risk assessment and further throughout the contracting phases. Where necessary, working with multiple contractor's/service providers activities may have to be controlled by using a permit-to-work system or bridging / interface procedural framework and documentation agreed jointly between multiple contractors and/or with other affected organizations.

The Contractors/service providers are responsible to ensure that their Subcontractors/service providers and suppliers are provided with a copy of our Subcontractor Safety Package prior to commencing work at GB locations. The Contractor/service providers must ensure that their Subcontractor's and/ or suppliers are oriented to the project, the acknowledgment is signed, and all required documents are delivered to GB management or the Site Supervisor. Upon awarding a contract Govan Brown might conduct a pre-mobilization audit where required to verify that contractor/service providers OHS program and systems are in place in accordance with the set Govan Brown requirements and contractual scope of work and check the competence of people, the condition of the equipment and the state of the worksite.

Supplemental audits can include the verification of the provision and maintenance of:

- Equipment and locations to be used for the work
- HSE equipment
- Communication systems and procedures
- Environmental protection systems
- Site and personnel security systems
- Verification of required training and competencies of those individuals who will perform the scope of work
- Local content/community and social responsibility requirements
- Health hazard identification and assessment, medical facilities, medevac procedures.

Prior to the commencement of work on site, the Subcontractor/service providers shall ensure the appointment of a "competent" supervisor to oversee health and safety responsibilities.

The Contractor/service providers' project manager and supervisor must attend an orientation meeting and verify the Subcontractor H&S review checklist in conjunction with the constructor's Govan Brown site supervisor or safety consultant. Where the Contractor employs five or more workers on the site, including Subcontractors, the supervisor must be present at all times or assign a competent person to supervise in his/her absence.

Govan Brown management and supervision will review and continually check and critically observe the activity, process, or system through monitoring contractors and service providers' performance at all contractual phases including but not limited pre-mobilization activities, execution activities and de-mobilization to assure that the scope of work is conducted according to the associated contract OHS requirements, acknowledged Subcontractor Safety Package and legislative requirements.

Govan Brown retains the right to revoke site access for contractor/service providers employees who violate any health and safety standard and/or procedure.

Govan Brown and contractor(s) /service providers management and supervision will ensure hazard assessments within contractual scope of work maintained and updated when required, to reflect process changes and re-approved as appropriate with retention of documented records of the review.

Govan Brown will ensure any changes and updates to company OHS Program / Occupational Health and Safety Management System (OHSMS) adequately communicated to contractors/service providers and other relevant parties.

The Contractors/service providers are responsible to ensure that their Subcontractors and suppliers fully understand and comply with minimum health and safety requirements of any job and have necessary programs in place communicated to employees through provided information, training, instructions and supervision.

Govan Brown management and supervision will lead regular and formal performance review meetings with the contractors with initiating, developing and closing actions relating to contractor performance issues.

Govan Brown management and supervision will conduct post job performance reviews and evaluation for contractors/service providers that will take into consideration administration, quality of work, timing and safety aspects utilizing Subcontractor Evaluation Checklist. Based on the overall performance, the rating of the capability assessment may be raised or lowered, and if necessary, a list of remedial actions provided to the contractor. Any actions should be resolved before being allowed to tender for future work.

#### **IMPLEMENTATION OF CHANGES**

Changes must be implemented as documented and agreed with controls and written procedures to manage changes.

These written procedures must ensure that the following considerations are addressed from a health and safety perspective prior to any change:

- Ensure there is knowledge and understanding of the purpose of the proposed change;
- Impacted stakeholders;
- Impacted processes and controls;
- Modifications to operating procedures;
- Necessary time period for the change; and
- Authorization requirements for the proposed change.

All workers who operate a process, or part of a process that will be affected by change, or whose job tasks will be affected by change, must be informed of, and trained in, the change prior to start-up. If a change is covered by a standard operating procedure or practice, the required safety information must be updated accordingly.

Once the change has been introduced, performance should be tracked to ensure there are no adverse impacts as measured by the identified key results indicators or other measures. Unfavourable impacts may require further analysis and development of additional action items. Action items identified for completion after the date of the change must be tracked to completion as well.

The approved action plan should be communicated to the personnel involved. The potential benefits of such communication include easier and faster implementation of the actions, familiarity with and feedback on the planned monitoring process and improved understanding and support of the change itself. Such communication may result in the identification of other issues or actions not previously identified.

Once all recommendations are complete and sufficient time has elapsed to evaluate the effects of the change, change leaders should conduct a final review to verify that all actions are complete and that key results indicators do not indicate any unfavourable results. That being the case, the change is considered complete and signed off by management.

Upon implementation of change, Govan Brown management will verify the following:

- Implemented changes are as intended;
- Documentations are complete pertaining to changes;

- Changes are communicated
- Applicable regulatory and legal requirements are fulfilled;
- Project Plan and Budget are amended

## **COMMUNICATION**

- This procedure will be communicated to all new hired employees through new employee general orientation or site-specific induction and/ or through periodic management and staff safety meetings or toolbox talk meetings.
- The procedure will be communicated to all existing employees through the OHS Program / Occupational Health and Safety Management System (OHSMS) orientation and /or through Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC)/Joint Occupational Health and Safety Committee (JOHSC) communication and periodic management and staff safety meetings as well as through periodic and ongoing safety training, internal communication protocols or structured training sessions.
- This procedure will be made available at the point of use to workers, subcontractors and suppliers upon request.

## **TRAINING**

- All new employees will receive awareness training as part of their orientation on their specific health and safety roles and responsibilities through the new hire orientation process.
- All existing employees will receive training on their health and safety roles and responsibilities through periodic staff OHS Program / Occupational Health and Safety Management System (OHSMS) orientation safety meetings as well as through periodic and ongoing safety training or structured training sessions.
- Verification of training will be confirmed via sign off and may include knowledge verification testing.

## **EVALUATION**

- This procedure will be reviewed on annual basis by Senior Management and /or during the annual OHS Program / Occupational Health and Safety Management System (OHSMS) internal audit and maybe changed due to business needs, any legal requirements and based on the results of the evaluation to ensure it continues to meet OHS regulation and standards and to ensure it is relevant with current operations and any changes will be indicated in the meetings minutes or reflected on the revision page.
- The Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) and management will also be involved with the evaluation by analyzing forwarded items of concern and suggesting corrective action.
- On a yearly basis, management will review OHS Program / Occupational Health and Safety Management System (OHSMS) to assess whether it is still compliant with current regulations and with the current work environment. If necessary and if required procedure will be amended to reflect the current operation.
- After the year-end audit a thorough analysis of the gaps identified will be conducted by the Internal Auditor & Senior Management will develop an action plan that addresses the deficiencies with an overall goal of continual improvement.
- Senior Management at least annually or more often as required should review and validate company Document Control Master List with indication supporting documents needed to implement, monitor and maintain active OHS Program / Occupational Health and Safety Management System (OHSMS) effectively and assess conformance with business, corporate and legal requirements as well as compliance with applicable standards.
- Document Controller or Designee will coordinate and manage Document Control Register to ensure changes to, and current versions status of, documents are identified and tracked in order to prevent the unintended use of obsolete documents and identify such documents if they are retained for any purpose

## **REFERENCES**

Occupational Health and Safety Act R.S.O. 1990  
OHS Program / Occupational Health and Safety Management System (OHSMS)  
Document Control Master List  
Document Control Register  
Occupational Health & Safety Risk Registry (OHS RR)  
Construction Hazard Assessment (CHA)  
Job Hazard Analysis / Assessment (JHA)  
Addendum: Subcontractor Safety Package  
Addendum: Index of Safe Work Practices (SWP)  
Addendum: Index of Safe Job Procedures (SJP)

## **COMPANY RULES & PROGRESSIVE DISCIPLINARY POLICY STATEMENT**

Govan Brown Associates Limited's senior management is vitally interested in the health, safety, and protection of our workers from workplace injury, illness or loss and committed to provide a safe work environment, and a work environment that promotes occupational health. To express that commitment in line with Health & Safety policy and in order to support Controls, Govan Brown established company rules and progressive disciplinary policy with interrelated and interacting procedures to govern the conduct and actions of employees within the scope of the current OHS Program / Occupational Health and Safety Management System (OHSMS).

Govan Brown will ensure that employees informed, and provided with instructions, written general safety rules and supplementary procedures in order to take reasonable precautions to eliminate the possibility of workplace injuries, illness or loss and improve overall safety culture.

General workplace safety rules and instructions provided in OHS Program / Occupational Health and Safety Management System (OHSMS) might not cover all the health and safety requirements employees are expected to follow for each different situation or additional location and site-specific safety rules could be established and implemented as required with further adequate communication to relevant work parties.

Management and supervisory staff is responsible for ensuring worker understanding of, and compliance with general safety rules and instructions as well as with any specific location / site safety rules and arrangements.

Everyone must understand and abide by workplace safety rules coupled with health and safety roles and responsibilities outlined within the scope of the current OHS Program / Occupational Health and Safety Management System (OHSMS).

Govan Brown management will ensure that company rules applied and enforced consistently throughout the company and employees who flagrantly or willingly disregard the established company rules, policies, procedures or standards will be subject to the appropriate progressive disciplinary measures. Govan Brown general progressive disciplinary actions will formally consist of three steps:

- Verbal Warning
- Written Warning
- Suspension / Dismissal / Termination

Although Govan Brown believes in disciplinary measures that are progressive in nature, in some cases discipline can begin with a written warning or suspension, and in more serious cases, an employee can be terminated without prior warning.

The following acts of misconduct are deemed Grounds for Dismissal infractions and will result in immediate termination from Govan Brown.

- Consuming, selling, or being in possession of alcohol or illegal drugs in the workplace;
- Theft, vandalism, damage or any other abuse/misuse of company property, equipment or asset;
- Damaging, disabling, or interfering with safety, emergency response, firefighting or first aid equipment;
- Fighting, horseplay, practical jokes or interfering with workers/ public is prohibited;
- Being in the possession of or under the influence of alcohol or illegal drugs while at work;
- Arriving for work or remaining at work when ability to perform a job safely is impaired under the influence of alcohol or illegal drugs;
- Time theft, being idle or performing tasks unrelated to designate position;
- Possession, sale, or use of weapons or any object kept for the intent to use as a weapon;
- Use of computer or internet during working hours to access certain websites (e.g., Pornography, Gambling);
- Taking or giving bribes, or any illegal gratification;
- The participation in or providing information that leads to the submission of a false or fraudulent WSIB/WCB/WorkSafeBC claim.



Colin Gray

President – Govan Brown Associates Limited

March 22/24

Date

## **COMPANY RULES & PROGRESSIVE DISCIPLINARY PROCEDURE**

### **PURPOSE**

Govan Brown has documented company rules to establish and communicate the company's expectations for personal conduct to their employees. These rules are designed to protect the health and safety of all individuals who may be impacted by Govan Brown or the performance of its work.

This program will include the company's method for taking corrective action through the progressive disciplinary process.

### **SCOPE**

These programs apply to all employees while on company property, client work sites and while in the course of doing business on behalf of Govan Brown.

## **ROLES AND RESPONSIBILITIES**

### **MANAGEMENT**

- Establish and maintain company rules as well as a progressive disciplinary program to correct inappropriate behaviour.
- Communicate current Company Rules by posting them as required on corporate office Health & Safety Board and (posting on trailer or where specified on project site-specific).
- Ensure all employees are made aware of Company Rules through orientation.
- Ensure supervisors understand and apply rules and corrective actions consistently.
- Review the Company Rules regularly to ensure their continued adequacy.
- Ensure Company Rules consistently enforced in all divisions, departments and areas of the company.
- Enforce and maintain progressive disciplinary policy and procedure and take appropriate actions in case of violation of Health & Safety Company Rules.

### **SUPERVISOR**

- Understand and follow the Company Rules as prescribed.
- Ensure all employees under their direction are aware of all Company Rules.
- Ensure all employees under their direction adhere to all established Health & Safety Company Rules.
- Use progressive disciplinary policy and procedure as a tool to correct inappropriate behaviour.

### **WORKERS**

- Be aware, understand and acknowledge Govan Brown Health & Safety Company Rules.
- Work in compliance with Govan Brown Health & Safety Company Rules, regulatory requirements and the Health and Safety program policies and procedures
- Be aware and understand company progressive disciplinary policy and procedure.

### **CONTRACTOR / SUBCONTRACTOR**

- Ensure all Contractor /Subcontractor employees under their direction understand, acknowledge, and follow Company Rules as prescribed.
- Ensure all Contractor /Subcontractor employees under their direction adhere to all established Health & Safety Company Rules.
- Use progressive discipline policy and procedure as a tool to correct inappropriate behaviour.



## PROCEDURE

- Govan Brown will establish workplace company safety rules based on legislative requirements, risk assessments and safe work practices/safe job procedures and policies as outlined in the Govan Brown Health and Safety Program.
- Established clear and concise workplace company safety rules will be documented and help to govern the conduct and actions of work parties and to protect the health and safety of any individual who may be impacted by Govan Brown or the performance of their work.
- Govan Brown will ensure that workplace company safety rules documented in writing and visibly posted or made available to each employee in the workplace.
- Govan Brown will ensure that work location specific rules documented and visibly posted at project site, available in site health and safety binder and communicated to all workers through workplace/site orientation.
- Govan Brown will provide training and communicate legislative requirements, established workplace company safety rules, policies, safe work practices and safe job procedures as outlined in the Govan Brown Health and Safety Program to ensure workers understood and follow them.
- All employees must perform work in accordance with legislative requirements, established workplace company safety rules, policies, safe work practices and safe job procedures as outlined in the Govan Brown Health and Safety Program.
- Govan Brown will establish, enforce and maintain Progressive Disciplinary Policy and administrative procedure / protocol and take appropriate actions in case of violation of legislative requirements, established workplace company safety rules, policies, safe work practices and safe job procedures as outlined in the Govan Brown Health and Safety Program.
- Govan Brown Management / Supervisors will be required to deal with non-compliance by enforcing Progressive Disciplinary Policy when workers willfully disregard legislative requirements, established workplace company safety rules, policies, safe work practices and safe job procedures as outlined in the Govan Brown Health and Safety Program.
- Govan Brown will communicate Progressive Disciplinary Policy and administrative procedure/protocol to work parties to ensure legislative requirements, established workplace company safety rules, policies, safe work practices and safe job procedures consistently enforced in all divisions, departments and areas of the company.
- Govan Brown will conduct observation and perform monitoring to ensure that work is performed in compliance with legislative requirements, established workplace company safety rules, policies, safe work practices and safe job procedures as outlined in the Govan Brown Health and Safety Program.
- Govan Brown also will establish, communicate and maintain clear and concise list of misconduct acts deemed as Grounds for Dismissal and reserve the right to utilize whatever form of discipline is deemed appropriate under the circumstance, up to and including immediate termination of employment on a single infraction, with or without prior notice.
- All records of disciplinary action will be kept on file and maintained at head office.

## PROGRESSIVE DISCIPLINARY POLICY

Compliance with legislative requirements, established workplace company safety rules, policies, safe work practices and safe job procedures as outlined in the Govan Brown Health and Safety Program is necessary to maintain a safe and healthy work environment. If any worker chooses to work in an unsafe manner or against company policy and procedures, the supervisor must take reasonable precaution for the protection of that worker and/or other workers who may be affected. Taking reasonable precaution may include; re-instruction, re-training, and in some cases, when workers willfully disregard policies and procedures or company rules, supervisors or management will be required to deal with non-compliance by enforcing this progressive discipline system.

- Progressive discipline action will be used as a tool to correct inappropriate behavior.
- Progressive discipline action allows the supervisor to communicate Govan Brown expectations for conduct and offers the offending worker an opportunity to correct their behavior.

At Govan Brown we do not view discipline as a form of punishment but as a rule or system of rules governing conduct or activity in order to eliminate unsafe circumstances.

Progressive discipline action will formally consist of three steps:

- **First Infraction:** Verbal Warning. Verbal discussion of infractions should be discussed with employee and documented on discipline notice. One violation will result in a written notice.
- **Second Infraction:** Written Warning. Second violation will result in a written notice and a meeting with management. It will result in up to a week off work, without pay. Documentation will be on file for one year and upon returning after the second violation the employee will be on no tice that the next violation for the same issue will result in termination.
- **Third Infraction:** Suspension / Dismissal. Third violation for the same problem will result in termination of employment.

No Reprisal: All GB employees are encouraged to follow and comply with workplace company rules / work location specific rules through demonstration and cooperation in their behaviours, attitudes, and performance.

GB will ensure that workplace company rules / work location specific rules applied and enforced consistently across the organisation regardless of individual position and seniority within the organisational structure, gender, age, culture including but not limited temporary or permanent workers, supervisors, management, contractors/service providers or visitors.

GB will make sure that performance and violation consequence management, as well as other forms of progressive disciplinary protocol, are carried out in a way that is non-discriminatory and is not based on stereotypes or discriminatory criteria to promote consistency, fairness, and effectiveness in enforcing company rules.

This approach, protocol and procedures will apply to any persons doing work on a GB work location, facility or project site.

General workplace safety rules and instructions provided in OHS Program / Occupational Health and Safety Management System (OHSMS) might not cover all the health and safety requirements employees are expected to follow for each different situation or additional work location and site-specific safety rules could be established and implemented as required with further adequate communication to relevant work parties. GB will ensure that work location specific rules documented and visibly posted at project site, available in site health and safety binder as well as communicated and provided to all workers through workplace/site orientation.

This will be discussed at the beginning of the project and reviewed throughout the duration of the project. Documentation of this policy will be noted on the orientation form for new employees.

The Health & Safety Manager, Project Managers, Operational Managers, Superintendents, and Company Safety Officers will issue the disciplinary warning notice. After notification of a written violation, a copy of the disciplinary warning notice will be sent to the personnel files, employee and Health & Safety Manager. The notice will remain on file for a period of one year, after which time it will be removed from the employee's record.

- Typically, disciplinary measures will be assessed as a response to inappropriate conduct, not a violation of a specific rule. To clarify, after receiving a written warning, an employee committing an infraction of a different rule would be subject to suspension/dismissal.
- The progressive disciplinary steps serve as a guideline only. Certain, more serious offences, may result in immediate suspension/dismissal or termination.
- For minor infractions, the supervisor may opt to coach the offending individual prior to initiating more formal discipline action.
- 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.
- The supervisor will notify Govan Brown of their intent to issue progressive discipline action.
- Upon Govan Brown approval, the supervisor will meet with the offending party to discuss the violation on case-by-case basis. The supervisor will allow the employee to explain their actions before making any determination for assessing discipline.
- The supervisor will then inform the employee of their intent to issue progressive discipline action (if appropriate). The supervisor will inform the offending worker of the reason for imposing progressive discipline action and provide the offending worker guidance to prevent a recurrence.
- The supervisor will document the disciplinary measure on a corrective action and issue the employee a copy of the signed form.
- A copy of the signed corrective action will be sent to the office and kept in the employee file.

### **GROUNDS FOR DISMISSAL**

The following acts of misconduct are deemed **Grounds for Dismissal** infractions and will result in immediate termination from Govan Brown.

- Consuming, selling, or being in possession of alcohol or illegal drugs in the workplace;
- Theft, vandalism, damage or any other abuse/misuse of company property, equipment or asset;
- Damaging, disabling, or interfering with safety, emergency response, firefighting or first aid equipment;
- Fighting, horseplay, practical jokes or interfering with workers/ public is prohibited;
- Being in the possession of or under the influence of alcohol or illegal drugs while at work;
- Arriving for work or remaining at work when ability to perform a job safely is impaired under the influence of alcohol or illegal drugs;
- Time theft, being idle or performing tasks unrelated to designate position;
- Possession, sale, or use of weapons or any object kept for the intent to use as a weapon;
- Use of computer or internet during working hours to access certain websites (e.g., Pornography, Gambling);
- Taking or giving bribes, or any illegal gratification;
- The participation in or providing information that leads to the submission of a false or fraudulent WSIB claim.

## COMMUNICATION

- Govan Brown workplace company safety rules located in the Govan Brown health and safety binder and be posted in the workplace H&S safety Boards.
- Govan Brown's workplace company safety rules will be communicated to all new Govan Brown workers, supervisors, and managers through new employee general orientation or site-specific induction and/ or through periodic management and staff safety meetings or toolbox talk meetings.
- All existing Govan Brown staff will receive orientation through the OHS Program / Occupational Health and Safety Management System (OHSMS) orientation and /or through Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) communication and periodic management and staff safety meetings as well as through periodic and ongoing safety training, internal communication protocols or structured training sessions.
- This procedure will be made available at the point of use to workers, subcontractors and suppliers upon request.

## TRAINING

- All new managers, supervisors, and workers will receive training on Govan Brown workplace company safety rules and procedure during their on-boarding training upon hire.
- All new employees will receive awareness training as part of their orientation on their specific health and safety roles and responsibilities through the new hire orientation process.
- All existing employees will receive training on their health and safety roles and responsibilities through periodic staff OHS Program / Occupational Health and Safety Management System (OHSMS) orientation safety meetings as well as through periodic and ongoing safety training or structured training sessions.
- Verification of training will be confirmed via sign off and may include knowledge verification testing.

## EVALUATION

- This procedure will be reviewed on annual basis by Senior Management and /or during the annual OHS Program / Occupational Health and Safety Management System (OHSMS) internal audit and maybe changed due to business needs, any legal requirements and based on the results of the evaluation to ensure it continues to meet OHS regulation and standards and to ensure it is relevant with current operations and any changes will be indicated in the meetings minutes or reflected on the revision page.
- The Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) and management will also be involved with the evaluation by analyzing forwarded items of concern and suggesting corrective action.
- On a yearly basis, management will review OHS Program / Occupational Health and Safety Management System (OHSMS) to assess whether it is still compliant with current regulations and with the current work environment. If necessary and if required procedure will be amended to reflect the current operation.
- After the year-end audit a thorough analysis of the gaps identified will be conducted by the Internal Auditor & Senior Management will develop an action plan that addresses the deficiencies with an overall goal of continual improvement.
- Senior Management at least annually or more often as required should review and validate company Document Control Master List with indication supporting documents needed to implement, monitor and maintain active OHS Program / Occupational Health and Safety Management System (OHSMS) effectively and assess conformance with business, corporate and legal requirements as well as compliance with applicable standards.
- Document Controller or Designee will coordinate and manage Document Control Register to ensure changes to, and current versions status of, documents are identified and tracked in order to prevent the unintended use of obsolete documents and identify such documents if they are retained for any purpose

## REFERENCES

Occupational Health and Safety Act R.S.O. 1990

OHS Program / Occupational Health and Safety Management System (OHSMS)

Document Control Master List

Document Control Register

Company Workplace Safety Rules

Disciplinary Warning Notice

## **WORKPLACE SAFETY RULES**

1. Accidents, Injuries or "near misses", regardless of their nature will be promptly reported to supervisors and the Safety Coordinator.
2. While on jobsites (office and vehicles excluded) all employees must wear CSA/ANSI approved hardhats and CSA approved (green patch) footwear.
3. Clothing shall be appropriate to the duties being performed. Long pants, adequate clothing, sturdy footwear are the minimum requirements.
4. Smoking is only permitted in designated areas determined by supervisor or provincial law.
5. Running is not permitted (unless under extreme emergency).
6. Safety glasses, goggles or face shields shall be worn when concrete breaking, metal chipping, welding, grinding and for other operations where eye protection is required.
7. Hand tools are to be used for their intended use only and any damaged or worn parts must be reported to supervisor to be promptly repaired or replaced.
8. Power tools shall be operated by authorized personnel only, with guards furnished by the manufacturer "in place."
9. All electrical hand tools shall be grounded or double insulated.
10. Explosive/powder actuated tools shall be used only by persons who are certified and trained in their safe use.
11. Compressed gas cylinders must be stored in a secured upright position.
12. Possession or use on the job of intoxicating beverages or unauthorized drugs is strictly for bid den and constitutes grounds for dismissal.
13. Riding on equipment is prohibited. No person shall ride on any hook, hoist, or other material handling equipment, which is used strictly for handling materials and not specifically designed to carry riders.
14. Welding and burning operations shall be carried out only by authorized personnel with appropriate individual protective equipment.
15. Horseplay, fighting, gambling and possession of fire arms are strictly for bid den on the job and constitute grounds for dis missal.
16. Anyone who handles propane or propane-fuelled equipment must be the holder of a certificate, or in the possession of an accepted Record of Training (ROT).

## FITNESS FOR DUTY

### PURPOSE

Govan Brown is committed to create and maintain a safe environment and this duty includes addressing any issue that may impair an employee's ability to perform their work functions responsibly.

This procedure outlines the requirements of fitness for duty, including disclosure requirements for employees and is also intended to assist supervisors, management, and employees in investigation, assessment, and required actions in potential unfit for duty situations.

### SYNOPSIS

All individuals working at Govan Brown (including volunteers and contractors) are expected to report fit for duty for scheduled work and be able to perform assigned duties safely and acceptably without any limitations due to use or aftereffects of alcohol, illicit drugs, non-prescription drugs, prescribed medications, or any other substance situation, or issue that may impair judgment or performance.

Employees are encouraged not to consume alcohol or misuse drugs prior to reporting to work or during unpaid breaks.

Govan Brown has taken the position that the presence of illicit drugs, recreational drugs and alcohol on the worksite is not permitted.

All staff is expected to report to their supervisor any impaired driving charge or conviction if expected to operate a vehicle or drive within three working days of receiving the charge or immediately if one's drivers license is suspended.

All employers and contractors are required to document and report any violations of this policy.

Any individual failing to adhere to this policy will be subject to discipline up to and including dismissal.

### SCOPE

This procedure applies to all employees of Govan Brown which includes but is not limited to regular and temporary employees.

Contractors will be advised of the applicable provisions of this policy, and in particular, the rules around fitness for duty, and alcohol and drug use or possession and will be expected to enforce these requirements for their employees, sub-contractors, and agents.

### DEFINITIONS

**Fatigue:** Extreme tiredness or exhaustion.

**Illegal Substance:** any substance illegally obtained as outlined in the *Controlled Drugs and Substances Act*.

**Impairment:** Being mentally or physically in a less effective or incapacitated state.

**Intoxicated:** Under the influence of alcohol or an illegal substance which may cause impairment.

**Fit for Duty:** Able to safely perform required job tasks.

**Medication:** A legal medication that has been authorized by a medical professional for use by his or her patient (e.g., pain medication, medical marijuana, etc.).

**Safety-Sensitive Position:** A position in which incapacity due to impairment could result in direct and significant risk of injury to the employee or others in the work environment.

**Unfit for Duty:** Unable to safely perform required job tasks. Reasons for a worker being unfit for duty may include impairment, intoxication, fatigue, or stress.

## **ROLES & RESPONSIBILITIES**

### **MANAGEMENT**

- Develop and maintain a procedure and program to ensure fitness for duty for all employees, and work in accordance with the provisions of this procedure at all times.
- Accommodate any disability a worker may have as well as any prescribed treatment for the disability, within reason.
- Accommodate a worker, where possible, who is required to use or take any prescription or OTC (over the counter) medication to treat a medical condition or disability.
- Maintain confidentiality of all private personal or medical details provided by an employee.
- Assist employees with reporting any condition or other circumstance that may affect the worker's fitness for duty.
- Provide resources for employees suffering from addiction or dependency issues.

### **SUPERVISOR**

- Understand the intent of this procedure, and work in accordance with the provisions of this procedure at all times.
- Observing the attendance, performance, and behavior of the employees who he or she supervises to monitor for fitness for duty.
- Notifying management of any instances of a worker potentially being unfit for duty.
- Immediately begin and carry out an investigation if it is suspected that a worker is potentially unfit for duty.
- Assist employees with reporting any condition or other circumstance that may affect the worker's fitness for duty.
- Maintain confidentiality of all private personal or medical details provided by an employee.
- Removing an employee who is unfit for duty from the workplace, which may include escorting the employee and/or arranging for safe transportation.

### **WORKERS**

- Understand the intent of this procedure, and work in accordance with the provisions of this procedure at all times.
- Report to work each day fit to perform his or her duties in a safe and effective manner.
- Report any concerns or potential instances of workers being potentially unfit for duty that they are aware of, to his or her supervisor.
- Disclose to his or her supervisor any condition or circumstance which may cause the employee to be unfit for duty.
- Disclose to his or her supervisor and/or employer the existence of any medical condition that may affect their ability to perform their job tasks in a safe manner.
- Disclose to his or her supervisor and/or employer the requirement to consume any prescription medication or participate in any treatment that may cause impairment or affect their ability to perform job tasks in a safe manner.
- Provide specific relevant medical information to the employer, when required. Confidentiality of personal or medical information will be maintained at all times.
- Use any prescribed medications only in the manner as directed by their doctor and/or pharmacist ensuring that their ability to perform work safely, competently or efficiently is not impaired.
- Cooperate in the accommodation process, where required.
- Cooperate with any investigations carried out by the supervisor and/or employer in potential unfit for duty situations.

## PROCEDURE

An employee will not be permitted to work unless he or she maintains fitness for duty required to adequately perform their job functions in a safe manner.

A worker has the responsibility to notify their employer if there is any reason, they may be unfit to perform their job tasks in a safe manner. This may include:

- Medical conditions
- Medication
- Fatigue
- Stress
- Intoxication

If an employee working is unable to perform his or her assigned tasks in a safe and acceptable manner, the employee and employer must work together to assess the situation on a case-by-case basis and determine an acceptable solution.

Discrimination against an employee due to a disability or condition (or any treatment required for a disability or condition) will not be tolerated at any time.

The employer will make every attempt to accommodate an employee who may be deemed unfit to perform his or her regular duties. Types of accommodation may include:

- Assignment of alternate duties
- Temporary reassignment to a non-safety-sensitive position

In order to accommodate an employee due to a condition or treatment required for a medical condition, the employee must disclose information to the employer. There are two types of disclosure; **voluntary disclosure** and **non-voluntary disclosure**:

**Voluntary disclosure:** In order for an employee to voluntarily disclose a condition, medication, or treatment that may make the employee unfit for duty, the following steps should be followed;

If an employee is prescribed a medication or treatment, he or she must consult with their doctor or medical professional to determine if the course of treatment may have an effect on their fitness for duty. If possible, and use an alternative choice that will not cause impairment.

If the medication or treatment may cause the employee to become unfit for duty, he or she must speak privately his or her supervisor and inform them of the circumstances. **Disclosure is required prior to any compromise of the employee's fitness for duty.**

Supervisor must inform senior management of the information provided by the employee.

The employee will meet with their supervisor and a senior management representative to discuss relevant details of the medication or treatment that may affect their fitness for duty.

In order to determine accommodation and know which tasks the employee may be able to perform safely, the employer may request that the worker obtain documentation from their medical professional which outlines;

The type of medication or treatment prescribed:

- The dosage of medication prescribed
- Effects of the prescribed medication or treatment on the employee

The employer may not request any irrelevant or unnecessary personal or private medical information.

All personal and/or medical information provided to the employer by the employee will be kept confidential.

A course of action or accommodation will be determined to ensure the safety of the employee and coworkers.

The employee working under accommodation must notify the employer of any changes in the medication or treatment. Changes may require modification of accommodations for the worker to ensure his or her safety.

**Non-voluntary disclosure:** Non-voluntary disclosure will occur if an employee does not voluntarily inform his or her supervisor or employer of a condition, medication, or treatment that may make the employee unfit for duty. If the employer, for any reason, becomes aware that disclosure did not occur, this is considered a violation of this policy and appropriate disciplinary action will be taken against the employee in question.

If an employee is required to bring a medication into the workplace, it must be stored and handled in a secure manner which does not allow for mishandling, use, or access by others.

If an employee is observed in a condition where they may be unfit for duty, the following steps must be taken immediately. Be sure to fully document all observations and stages of the investigation:

- Remove the employee from any hazardous area and escort them to a safe and private location. Do not have them report to another location on their own and do not leave them unattended at any time.
- Explain to the employee that he or she appears to be in a condition unfit to safely perform their duties.
- Discuss your concerns and observations, and give the employee an opportunity to explain their behavior.
- Take appropriate action based on the result of the above steps to ensure the safety of all workers.
- Notify senior management and provide a report of the occurrence. Document all observances, conversations, and details of the actions taken.

If a worker who is unfit for duty requires removal from the workplace, the employer must arrange for safe transportation. This may include:

- Contacting a family member
- Arranging and paying for a taxicab
- Contacting emergency medical services (911) if medical attention may be required.
- If the worker attempts to drive their vehicle and they may be in a condition where they are unfit to safely do so, notify police (911) immediately.

If any addiction, dependency, or substance abuse is reported to or suspected by the employer, measures will be taken to assist the employee in question. Some resources may include:

- Referral to a doctor or other medical professional
- Referral to a rehabilitation or assistance program
- CAMH (Centre for Addiction and Mental Health):  
 Helpline: 416 535-8501 / Toll-free: 1 800 463-2338  
 Website: [www.camh.ca](http://www.camh.ca)
- ConnexOntario (Addiction, Mental Health, and Problem Gambling Treatment Services)  
 ConnexOntario Switchboard  
 Helpline: 1-866-531-2600  
 Website: [www.connexontario.ca](http://www.connexontario.ca)
- CCSA (Canadian Centre on Substance Use and Addiction)  
 Helpline: 1-833-235-4048 / 613-235-4048  
 Website: [www.ccsa.ca](http://www.ccsa.ca)
- De Novo Treatment Centre  
 Tel: 705-787-0247 | Fax: 705-788-2607  
 Toll Free: 1-800-9DeNovo (1-800-933-6686)  
 Website: [www.denovo.ca](http://www.denovo.ca)



## **ZERO TOLERANCE FOR ALCOHOL AND SUBSTANCE USE IN THE WORKPLACE**

The following behavior by employees is not permitted:

- Use or consumption of any form of alcohol and/or illicit drugs by employee in the workplace at any time which may impact on the job performance, threaten their own safety, the safety of the public and other employees.
- The use, sale, purchase, transfer, or offering of an illegal substance on company property or at a site where the employee is engaged in work.
- Arrival at or being present at the workplace under the influence of alcohol or illegal substances. This includes, but is not limited to, meal periods, scheduled breaks, and “on-call time” while at the office, construction site, place of business, or at any other location where the employee may be during the course of employment.

Any use or possession of illegal substances will be grounds for immediate disciplinary action. There is zero tolerance for substance use in the workplace.

Anyone employee found to be in violation any aspect of this policy will be subject to immediate disciplinary action, up to and including dismissal.

### **COMMUNICATION**

- Govan Brown workplace company safety rules and fitness for duty procedure located in the Govan Brown health and safety binder and be posted in the workplace H&S safety Boards.
- Govan Brown's workplace company safety rules and fitness for duty procedure will be communicated to all new Govan Brown workers, supervisors, and managers through new employee general orientation or site-specific induction and/ or through periodic management and staff safety meetings or toolbox talk meetings.
- All existing Govan Brown staff will receive orientation through the OHS Program / Occupational Health and Safety Management System (OHSMS) orientation and /or through Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) communication and periodic management and staff safety meetings as well as through periodic and ongoing safety training, internal communication protocols or structured training sessions.
- This procedure will be made available at the point of use to workers, subcontractors and suppliers upon request.

### **TRAINING**

- All new managers, supervisors, and workers will receive training Govan Brown workplace company safety rules and fitness for duty procedure during their on-boarding training upon hire.
- All new employees will receive awareness training as part of their orientation on their specific health and safety roles and responsibilities through the new hire orientation process.
- All existing employees will receive training on their health and safety roles and responsibilities through periodic staff OHS Program / Occupational Health and Safety Management System (OHSMS) orientation safety meetings as well as through periodic and ongoing safety training or structured training sessions.
- Verification of training will be confirmed via sign off and may include knowledge verification testing.

### **EVALUATION**

- This procedure will be reviewed on annual basis by Senior Management and /or during the annual OHS Program / Occupational Health and Safety Management System (OHSMS) internal audit and maybe changed due to business needs, any legal requirements and based on the results of the evaluation to ensure it continues to meet OHS regulation and standards and to ensure it is relevant with current operations and any changes will be indicated in the meetings minutes or reflected on the revision page.
- The Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) and management will also be involved with the evaluation by analyzing forwarded items of concern and suggesting corrective action.
- On a yearly basis, management will review OHS Program / Occupational Health and Safety Management System (OHSMS) to assess whether it is still compliant with current regulations and with the current work environment. If necessary and if required procedure will be amended to reflect the current operation.

- After the year-end audit a thorough analysis of the gaps identified will be conducted by the Internal Auditor & Senior Management will develop an action plan that addresses the deficiencies with an overall goal of continual improvement.
- Senior Management at least annually or more often as required should review and validate company Document Control Master List with indication supporting documents needed to implement, monitor and maintain active OHS Program / Occupational Health and Safety Management System (OHSMS) effectively and assess conformance with business, corporate and legal requirements as well as compliance with applicable standards.
- Document Controller or Designee will coordinate and manage Document Control Register to ensure changes to, and current versions status of, documents are identified and tracked in order to prevent the unintended use of obsolete documents and identify such documents if they are retained for any purpose

## **REFERENCES**

Occupational Health and Safety Act R.S.O. 1990

OHS Program / Occupational Health and Safety Management System (OHSMS)

Document Control Master List

Document Control Register

Company Safety Rules

Disciplinary Warning Notice

Fitness for Duty Voluntary Disclosure Form

Fitness for Duty Incident Reporting Form

## VISITORS SAFETY

### PURPOSE

To standardize a protocol to ensure all visitors act in accordance with the Govan Brown's health and safety policies, procedures and the legislative requirements.

### SCOPE

This procedure applies to all company visitors including, but not limited to: contractors, subcontractors, vendors, suppliers, clients and consultants who may visit any company location. This procedure does not apply to subcontractors who will be working on site for a long period, as they will not be treated as visitors.

### DEFINITIONS

**Visitor** -- short term non-operating personnel requiring access to the workplace such as: contractors, subcontractors, vendors, suppliers, clients, consultants, family members, etc.

## ROLES AND RESPONSIBILITIES

### VISITOR

- Remain with designated host at all times.
- Adhere and abide by all company policies and procedures.
- Use all required personal protective equipment.
- Unless authorized and qualified, any equipment is not to be touched.
- Remain outside of restricted or unauthorized areas.
- Follow all posted signs and rules.
- In the event of an emergency, follow the instructions of the designated host.
- Report any injury/illness or hazards identified during the visit to their designated host.
- Sign-in using the visitor log. Sign-out upon exiting the workplace and vacate the premise in a timely manner.

### DESIGNATED HOST

- Ensure that the visitors entering the premises are signed in.
- Inform the visitor of any personal protective equipment that will be required during the visit.
- Ensure site visitors receive a site-specific orientation.
- Inform the visitor that in the event of a fire alarm, to leave the workplace using the closest exit and assemble at the designated location.

## PROCEDURE

To ensure that our employees and visitors are in a safe environment, the following minimum standards are to be strictly adhered to.

### 1. Entry of the premises

The following are the steps which must be followed when a visitor enters the facility:

- Visitor must read the Visitor Health and Safety Responsibilities statement.
- Visitor is required to provide identification, internal company contact and the purpose of the visit through the Visitor Sign-In and Sign-Out Log.
- Visitor must not leave the front area until the designated host arrives.
- Visitors entering a work site must coordinate with the designated host, in advance, regarding the site-specific visitor policy. Visitors will be required to complete a site orientation and specific training, as required.

## **2. During the visit**

The following must be followed by the visitor during the visit:

- Be accompanied by a designated host at all times.
- Once the visitor has signed out, they must promptly leave the premise.
- Visitors are asked to report concerns, unsafe conditions or situations to their host.
- Wear all required personal protective equipment.
- Obey all posted signs and warnings.
- Be alert and yield to vehicular and rail traffic.
- Do not touch or interfere with our processes or workplace equipment.
- Stay with their host and keep out of restricted areas.
- Watch for moving equipment or vehicles.

## **COMMUNICATION**

- Govan Brown workplace company safety rules and visitor safety procedure located in the Govan Brown health and safety binder and be posted in the workplace H&S safety Boards.
- Govan Brown's workplace company safety rules and visitor safety procedure will be communicated to all new Govan Brown workers, supervisors, and managers through new employee general orientation or site-specific induction and/ or through periodic management and staff safety meetings or toolbox talk meetings.
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## **TRAINING**

- All new managers, supervisors, and workers will receive training Govan Brown workplace company safety rules and visitors safety procedure during their on-boarding training upon hire.
- All new employees will receive awareness training as part of their orientation on their specific health and safety roles and responsibilities through the new hire orientation process.
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OHS Program / Occupational Health and Safety Management System (OHSMS)

Document Control Master List

Document Control Register

Company Safety Rules

Disciplinary Warning Notice

Visitor Health and Safety Responsibilities

Visitor Sign-In and Sign-Out Log

## PERSONAL PROTECTIVE EQUIPMENT POLICY STATEMENT

Govan Brown Associates Limited assumes responsibility for designing, planning and arranging work processes within the company so that safety and health hazards are eliminated or maintained as low as reasonably practicable.

Where hazards cannot be completely eliminated through engineering controls and substitution of materials, management will provide and administer controls including the appropriate personal protective equipment (PPE) arrangements to the workers. Management will ensure that each worker is properly trained in and knowledgeable of the hazards associated with his/her work, the type of PPE required and its proper maintenance, care and use.

In order to ensure that workers are protected from hazards where possible, it is policy that all personnel on Govan Brown Associates Limited facilities and project sites wear the appropriate PPE required by the company and construction regulations at all times. This regularly includes the mandatory, as required additional and specialized personal protective equipment that meets or exceeds current CSA standards and legislative requirements.

Personal Protective Equipment is an essential component of risk hazard control to mitigate the risk of injury. Govan Brown Associates Limited developed and maintained PPE program which provides direction for the need, selection, care, and use of the mandatory, additional, and specialized personal protective equipment.

**Mandatory Personal Protective Equipment:** CSA approved (green patch) safety footwear, CSA/ANSI approved hard hats, high-visibility vest, level 4 cut-resistant gloves (please see Glove Policy), and safety glasses on all sites.

**Additional and Specialized Personal Protective Equipment:** Including but not limited to; safety gloves, earplugs/earmuffs, respiratory masks, fall protection, etc.

This program will apply to all Govan Brown Associates Limited employees and contractors in the performance of work, where appropriate. The additional and specific Personal Protective Equipment requirements will be identified through the Hazard Risk Assessment Process in addition to the mandatory PPE.

All workers must work in compliance with the provisions of the Occupational Health and Safety Act and the regulations and use or wear the equipment, protective devices, or clothing that the worker's employer requires to be used or worn.

Every worker must protect their own and coworkers' health and safety by learning about the hazards and its controls in the workplace, working in compliance with the law, safe work practices and procedures and programs established by this company.

Govan Brown Associates Limited, as an employer, is ultimately responsible for worker health and safety. As president, I give you my personal commitment that I will comply with my duties under the Occupational Health and Safety Act, such as taking every reasonable precaution for the protection of workers in the workplace.



Colin Gray

President – Govan Brown Associates Limited

March 22/24

Date

## GLOVE POLICY

**Objective:** The mandatory glove policy is designed to ensure the safety of all workers by requiring gloves be worn on our construction sites. However, exceptions can be made when it is determined during pre-task planning that gloves would significantly impair work or create a greater hazard. This policy is in place to minimize hand-related injuries within the construction industry.

- CDC: Hand injuries cause more than 1 million workers to be sent to the emergency room annually.
- BLS: 110,000 lost workdays annually from lacerations and cuts.
- OSHA: 71% of hand injuries are preventable by safety gloves alone.

### Policy Guidelines:

1. **Scope:** This policy applies to all construction sites and associated activities. All staff, employees, contractors, and visitors are expected to adhere to this policy.
2. **Pre-task Planning:** Before commencing any construction task, a pre-task planning session is to be conducted. During this pre-task planning, the potential hazards and necessary safety measures, including glove use, must be addressed. If it is determined that gloves will impair work or create a greater hazard, they may be exempted for that specific task. An exemption must be specifically stated in a written pre-task plan addressing the qualifying issues and approved by the competent person, with limited applicability to performance of that specific work task.
3. **Mandatory Glove Use:** There is no exemption allowed in the following situations:
  - Handling abrasive materials, such as wood, metal, glass, or concrete.
  - When exposed to sharp objects, such as nails, wires, or broken glass.
  - During manual material handling tasks that pose a risk to the hands.
4. **Exemptions:** Gloves may be exempted in situations where they are determined to be unsafe or impair the quality of the work, such as:
  - When gloves could get caught in moving machinery.
  - Where gloves may reduce the worker's dexterity to a dangerous level.
  - Where glove options do not permit the level of quality finish required of the tradesman.
  - If there is a risk of chemical contamination, and gloves could worsen the situation.
5. **Glove Selection:** Proper gloves should be selected based on the task and potential hazards. Gloves may vary in material (e.g., leather, cut-resistant, chemical-resistant), thickness, and design. Workers should be trained on the selection of appropriate gloves. Standard glove is a cut resistance level A4 or higher (ANSI/ISEA 105).
  - Note: Any existing stock of A3 cut resistance level gloves may be exhausted before replacing with A4.
6. **Training and Awareness:** All employees should receive training on the proper use of gloves, the associated hazards, and how to conduct a pre-task planning session. Additionally, posters and reminders should be displayed at the construction site to reinforce the importance of glove use.
7. **Supervision and Enforcement:** Site supervisors and project management are responsible for enforcing this glove policy. They should regularly inspect work areas to ensure compliance and address any non-compliance issues promptly.
8. **Review and Continuous Improvement:** This policy should be reviewed periodically to ensure its effectiveness and make necessary adjustments based on lessons learned and changing conditions at the construction site. Continuous vigilance, training, and regular reviews are essential to maintain a safe work environment.

The mandatory construction glove policy is in place to prioritize the safety and well-being of all individuals on construction sites. While gloves are typically required, the flexibility of the program allows for exceptions when they would be more detrimental than beneficial.



Colin Gray

President – Govan Brown Associates Limited

March 22/24

Date

## **PERSONAL PROTECTIVE EQUIPMENT PROGRAM & PROCEDURE**

### **PURPOSE**

The purpose of the Govan Brown Personal Protective Equipment (PPE) Program is to determine and outline the mandatory, additional and specialized personal protective equipment to be utilized to assist in mitigating risk at worker as a result of the Hazard Risk Assessment Process as well as based on legislated or other specific requirements i.e. Safety Data Sheet (SDS); Original Equipment Manufacturer (OEM) requirements, CSA standards, Occupational Health & Safety Risk Registry (OHS RR); Construction Hazard Assessment (CHA); Job Hazard Analysis/ Assessment (JHA); Safe Work Practices (SWP) & Safe Job Procedures (SJP); First Aid & Emergency Response and preparedness arrangements.

The program will provide direction for the need, selection, care and use of personal protective equipment.

### **SCOPE**

This program will apply to all Govan Brown employees and contractors in the performance of work, where appropriate across Ontario.

## **ROLES AND RESPONSIBILITIES**

### **EMPLOYER**

- Provide guidelines based on project site requirements as determined by Hazard Risk Assessment Process.
- Develop, maintain and communicate PPE matrix to work parties.
- Purchase and maintain equipment as required and ensure workers have area for storage for PPE, direction on how to use equipment.
- Ensure that provided, worn or used PPE is a proper fit, having regard to all relevant factors including body types
- Ensure subcontractors follow and have required PPE for task-specific work.
- Determination of PPE free-zone, where applicable.
- Arrange for training related to specialized PPE for worker's and maintain training records.

### **SUPERVISOR**

- Use information from Hazard Risk Assessment Process and/or job hazard assessments to review and assign PPE for specific job tasks based on PPE matrix and other specific requirements.
- Monitor and enforces the requirement for supervisors, workers and subcontractors to use required PPE.
- Ensure subcontractors follow and have required PPE for task-specific activities.
- Ensure that provided, worn or used PPE is a proper fit, having regard to all relevant factors including body types
- Ensure adequate training is provided to the workers on the safe usage, selection and care of PPE.
- Determine PPE free-zone, where applicable.

### **WORKERS**

- Awareness, understanding and acknowledgement of Govan Brown PPE requirements, storage and use as well as PPE matrix requirements.
- Understand the limitations of the PPE and know what to do in the event of exposure or device failure (e.g., eyewash stations, first aid).
- Maintain applicable Records of Training for specialized PPE
- Perform required inspection of PPE, record equipment inspection where and when required.
- Ensure that provided, worn or used PPE is a proper fit, having regard to all relevant factors including body types
- Understand when to discard/replace PPE and report any missing or defective devices to the supervisor.

### **CONTRACTOR/SUBCONTRACTOR**

- Uses information from Hazard Risk Assessment Process and/or job hazard assessments to review PPE matrix and assign PPE for specific job tasks as required.
- Monitors and enforces the requirement for supervisors, workers, and subcontractors to use required PPE.
- Ensure subcontractors follow and have required PPE for task-specific activities.
- Ensure that provided, worn or used PPE is a proper fit, having regard to all relevant factors including body types



## PROCEDURE

Govan Brown ensures that all activities requiring PPE are identified through thorough hazard assessments conducted via various processes such as the Hazard Risk Assessment Process in the Occupational Health & Safety Risk Registry (OHS RR), Construction Hazard Assessment (CHA), Job Hazard Analysis/Assessment (JHA) as well through elaborated controls including Safe Work Practices (SWP) & Safe Job Procedures (SJP).

Additionally, Govan Brown maintains a detailed PPE matrix that outlines specific criteria for selecting appropriate PPE to mitigate and control risks for workers, based on legislated or other specific requirements including Safety Data Sheets (SDS), Original Equipment Manufacturer (OEM) requirements, CSA standards, and First Aid & Emergency Response arrangements.

The PPE program and matrix also provide comprehensive written guidelines for the selection:

- Selection - which protective equipment to use and when.
- Inspection – key inspection points as per manufacturers and legislative requirements
- Use (Fit) - the correct use/fit of the equipment.
- Maintenance - the proper maintenance of the equipment.
- Storage - the safe way to store protective equipment.
- Replacement - how and when to replace the protective equipment.

Management and supervisors continuously monitor work activities and site conditions to ensure that mandatory/additional/specialized PPE is available and provided as needed, depending on the hazards present. All personnel on the job site, including managers, supervisors, workers, subcontractors, and service providers, must adhere to applicable PPE requirements and ensure that provided PPE is properly fitted and used considering all relevant factors including body types.

All personal protective equipment must be inspected before its use and used and maintained as prescribed by the applicable manufacturer's recommendations and/or legal requirements. Specific PPE inspection forms, equivalent templates and/or software application modules could be utilized to record inspection, as long as the intent of the requirements is met.

Workers receive training of PPE requirements during new employee induction and/or site-specific health and safety orientations. Additionally, identified job-specific PPE requirements are communicated through various health and safety documentation, such as Job Hazard Analyses, Safe Work Procedures (SWP's), Safety Data Sheets (SDS's), applicable CSA standards and manufacturer's recommendations.

In addition, requirements for job-specific PPE and its selection, inspection, fitting use and maintenance will be communicated via training sessions (e.g., WHMIS, Working at Heights, Traffic Control, etc.), Toolbox Talks, health and safety meetings.

When selecting PPE, the following factors must be considered:

- |  |   |
|--|---|
| • Legislated Requirements & Applicable CSA Standards | • Hazard Assessments                        |
| • Safety Data Sheets (SDS)                           | • Safe Work Practices & Safe Job Procedures |
| • Original Equipment Manufacturer (OEM) instructions | • Industry's Best Practices                 |

To guarantee adherence to PPE requirements at every level, Govan Brown enforces strict measures. Management, including managers and supervisors, oversee and uphold PPE usage among all staff, including managers, supervisors, workers, subcontractors, and service providers. This involves regular workplace inspections, on-site observations, sampling of PPE checks, and periodic audits to assess PPE compliance and pinpoint areas for enhancement. Thorough documentation of these activities stands as proof of Govan Brown's dedication to ensuring conformity with PPE guidelines.

## TYPES OF PERSONAL PROTECTIVE EQUIPMENT (PPE)

Our Health & Safety program categorizes PPE into two general types:

**Mandatory** – Essential for all personnel in workplaces where hazards such as head and foot injuries, and / or working around moving vehicles or other machinery traveling under their own power. This includes appropriate clothing for climate/weather conditions, CSA Type 2 Class G/ Class E Hard Hats, CSA Grade 1 Safety Footwear with Green Triangle, and High-Visibility Safety Apparel (HVSA).

**Specialized** – Reserved for specific jobs or to protect against identified hazards or combination of hazards. These are determined through hazard assessments and control process and may include hand, skin, eye, and face protection, respiratory and hearing protection equipment, as well as fall protection gear (full body safety harnesses, snap hooks, lanyards, lifelines, rope grabs), and equipment for confined space entry and emergency response and rescue. Additional requirements are based on legislated standards, Safety Data Sheets (SDS), Original Equipment Manufacturer (OEM) instructions, and CSA standards.

Depending on Hazard Assessment, task specific arrangements and operation requirements mandatory and / or additional PPE could be categorized and added as specialized PPE. Govan Brown will ensure that specialized PPE training provided to workers prior to start work which might include, but not limited: High-Visibility Safety Apparel (HVSA) for Traffic Control, Respiratory Protection Equipment, specific type of eye/face, hand, body/limbs and skin protection as well as hearing protection devices and fall protection equipment.

## **MANDATORY PERSONAL PROTECTIVE EQUIPMENT (PPE) PERSONAL CLOTHING**

All workers must equip themselves with suitable clothing for protection against both the climate / weather and workplace hazards. For work in wet conditions, the outer layer of clothing should be waterproof. Clothing should be selected to suit the temperature, weather conditions (e.g., wind speed, rain), the level and duration of activity and job design.

An employee's personal work clothes are to fit his/her work assignment. At minimum all workers must wear shirts with sleeves, long work pants and sturdy work shoes or boots when working outdoor or at facilities/project site. Sleeveless or tank top shirts, short pants, sweatpants, athletic wear, sneakers, sandals and high-heeled or open-toed shoes are not permitted working outdoor or at facilities/project site. Inappropriate clothing that is ripped, frayed, stained or messy should be avoided.

It is recommended that workers in office wear closed toe footwear at all times. Shoes must cover the entire foot and is recommended to be made of durable material, such as leather. Sandals, flip-flops, and other open-toed shoes are not permitted within the previously mentioned areas as it exposes the feet to hazards such as chemicals and sharp objects. High-heeled shoes are strongly advised against as they increase the risk of the worker of tripping or falling.

Long pants required as minimum protection for outdoor and project site/facilities activities which help to prevent sunburn, plant rashes, abrasions and insect bites, and to afford some protection against flying particles and accidental spills of liquids.

When clothing may come in contact with moving parts of equipment, tools or machinery, the clothing must not be torn, ragged or loose, and pants must not have cuffs. High-visibility apparel must be worn when there is exposure to the danger of moving vehicles.

Where there is a danger of making contact with moving parts of machinery, equipment, or tools:

- Avoid loose-fitting or frayed clothing;
- Remove accessories such as rings, dangling neckwear, loose-fitting bracelets and watch bands;
- Confine long hair;
- Wear shirts with sleeves and adequate long pants;

### **HEAD PROTECTION**

Head injuries can occur under various circumstances including as the result of a slip or fall, working in confined areas, where there are low ceilings or passage heights, or where there may be falling objects.

The risk of falling or flying objects, impact against a fixed object, or contact to exposed energized electrical conductors creates a potential for head injury. Although the human skull offers a good degree of natural protection, such hazards must be considered potentially life-threatening.

Whenever practicable, these hazards shall be eliminated or reduced through the use of engineering and/or administrative controls. To protect against those hazards which continue to exist after all such control measures have been implemented, appropriate protective headwear (usually hard hats) must be used. These guidelines are based on the Canadian Standards Association (CSA) CSA Z94.1-15, "Industrial Protective Headwear – Performance, Selection, Care, and Use."

All Govan Brown employees, subcontractors, and visitors shall wear a CSA approved Type 2 Headwear at all times while on company project sites.

#### **Selection**

- Must be CSA approved Type 2 with protection from impact, penetration at the crown (top) and laterally (sides)
- Must be CSA approved Class C and/or Class G / Class E - non-conducting material
- Headwear consists of a shell and the suspension. These work together as a system and both need regular inspection and maintenance. Ensure headwear fit properly
- Bear in mind that only your head is protected with a Class G or E hard hat, by no means your entire body. It is not intended to be used as a primary barrier in a protective system designed to prevent contact with a live electrical apparatus. Make sure you wear properly insulated equipment if you're working with electricity.

#### **Inspection**

- Pre-use visual inspection of headwear shell, suspension and liner during the Job Hazard Assessment (JHA) prior the task. Visually inspect the shell for breakage, cracks, craze pattern, discoloration, chalky appearance, or any other unusual condition;
- Inspect the shell for brittleness by flexing the brim; Check for cracks and other signs of wear such as dents, cuts or gouges;
- Inspect suspension for loss of flexibility and inspect for cracks, breaks, frayed straps, or damaged stitching. If any are found, the suspension must be replaced immediately;

### Use

Headwear consists of a shell and the suspension. These work together as a system and both need regular inspection and maintenance. To properly fit a headwear product, the worker should place the headwear on his or her head and pushdown on the top of the headwear until the headband and shell are at a comfortable height. Care should be taken to leave an air gap between the top of the head and the crown of the headwear. The harness should not be in contact with the crown of the headwear at any point. The air gap is a vital part of the shock absorption system for protecting the head against an impact to the shell.

The user should then gradually tighten or adjust the nape strap onto the nape of the neck until the headband fits securely and comfortably. If properly tightened, headwear will be unlikely to fall from the head when the user leans forward and unlikely to shift position when the user's head is turned from side to side.

- Do not transport headwear in rear windows of vehicles exposed to heat and UV light.
- Inspect headwear before each use.
- Always check with the manufacturer when adding or using accessories.
- Ensure that the suspension is in good condition. The main purpose of the suspension is to absorb energy.
- Winter liners should be inspected to ensure they do not interfere with fit of headwear.
- Do not draw the chin strap over the brim or peak of the headwear.
- Do not wear baseball style hats under the headwear as it interferes with the suspension.
- Unless permitted in the manufacturer's written instructions for use, protective headwear must not be worn backwards.
- Do not drill holes, alter or modify the shell. Alterations may reduce the protection provided by the headwear.
- Do not paint the plastic shell. Paint solvents can make plastic headwear brittle and more susceptible to cracks. Paint can also hide cracks that may develop.
- Do not use winter liners that contain metal or electrically conductive material under Class G or E headwear.
- Do not use metal labels on Class G or E headwear.

### Maintenance

Inspect and replace a shell that shows signs of wear, scratches or gouges. Shells exposed to heat, sunlight and chemicals can become stiff or brittle. A visible pattern of tiny cracks may develop. Over time, weathered hats can become dull in color or have a chalky appearance. Replace headwear when any of the above signs of wear start to appear or if headwear has been struck, even if no damage is visible.

The suspension system is as important as the shell. It holds the shell away from the head and acts as a shock-absorber. It also holds the shell in place on the head and allows air to flow freely. Inspect suspension system before each use and look closely for cracked or torn adjustment slots, frayed material or other signs of wear. Check the suspension lugs carefully. Long periods of normal use can damage the suspension. Perspiration and hair oils can speed up the deterioration of suspension materials. Replace the suspension if it has torn or broken threads. Do not put anything between the suspension and the shell. There must be a clearance inside the headwear. In case of a blow to the head, that space helps absorb shock. Do not use a suspension made by one manufacturer with products made by another manufacturer. Do not change or alter any of the suspension, liner or shell.

### Storage

The manufacturer's instructions should be consulted for product-specific cleaning procedures. One way to help lengthen the service life of protective headwear is by regularly cleaning the shell, suspension, and liner. This not only improves appearance, but removes dirt and stains that can hide small cracks.

For cleaning the shell of protective headwear, an appropriate cleaning agent or a mild soap in warm water should be used with a sponge or soft brush. This will wash away most stains, dirt, and grime. The same procedure can be used to remove dirt, perspiration, and hair oils from the suspension and liner. If materials such as tar or grease are found, they should not be cleaned with an abrasive, petroleum-based cleaning agent, or a solvent, which will weaken the material. Instead, the affected part of the headwear should be replaced. After washing, the shell, suspension, and liner should be thoroughly rinsed and then air dried. Drying by application of direct heat should not be attempted, because this can age the shell, suspension, and liner and shorten the service life of headwear.

Headwear should not be stored in direct UV sunlight (e.g., the rear window deck of a vehicle). This tends to make the shell brittle and ages it faster on account of deterioration from solar ultraviolet radiation.

**Replacement**

- Replace a shell that shows signs of wear, scratches or gouges.
- Replace a shell that shows a visible pattern of tiny cracks or if weathered hats became dull in color or have a chalky appearance.
- Replace headwear that has been struck, even if no damage is visible.
- Remove and destroy any headwear if its protective abilities are in doubt.
- Replace the suspension if it has torn or broken threads.

**FOOT PROTECTION**

The risk for slipping, uneven terrain, abrasion, ankle protection and foot support, the potential for crushing injuries, temperature extremes, and exposure to corrosive substances, puncture hazards, electrical shock and any other recognizable hazards creates the potential for foot injury.

Whenever practicable, these hazards shall be eliminated or reduced through the use of engineering and/or administrative controls. To protect against those hazards which continue to exist after all such control measures have been implemented, appropriate protective footwear (usually safety boots) must be used. These guidelines are based on the Canadian Standards Association (CSA) CSA Z195, "Protective footwear" and CSA Z195.1 "Guideline for selection, care, and use of protective footwear".

All Govan Brown employees, subcontractors, and visitors shall wear a CSA approved Grade 1 protective footwear (signified by the green patch) at all times while on facilities/ project sites.

All employees, subcontractors, and visitors shall supply their own protective footwear.

Protective footwear must cover the ankle for protection and shall be fully laced and tied in compliance with manufacturer's specifications.

Employees, subcontractors, and visitors shall clean, store, and maintain their footwear in compliance with manufacturer's specification.

Employees, subcontractors, and visitors shall inspect their protective footwear each day, prior to first use, to ensure it will provide the intended level of protection.

**Selection**

- Must be CSA Z195 approved protective Footwear.
- Shall be green tagged. The footwear containing the green triangle is intended for heavy industrial work environments, especially that of construction where sharp objects, such as nails, are present.
- Ensure they fit properly and must cover the ankle for protection. (Should fit snug when laced up with ample toe room).

Users should also consult with the protective footwear manufacturer / supplier for additional requirements as:

- |                             |   |
|-----------------------------|---|
| a) resistance to heat/cold; | b) abrasion resistance;                               |
| c) water resistance;        | d) ankle protection (other than chainsaw protection); |
| e) flame resistance;        | f) compression; and                                   |
| g) chemical resistance;     | h) dielectric (step potential) protection.            |
| i) arc flash protection;    |   |

**Inspection**

- Pre-use visual inspection of footwear condition during the Job Hazard Assessment (JHA) prior the task. Visually inspect for damage, cracks in soles, breaks in leather or exposed toe caps;
- Check protective footwear before and after each use.
- Non-repairable footwear should be appropriately destroyed or rendered unwearable;

**Use**

Recommendations to ensure proper fit include the following:

- Normally feet swell during the daily work shift. Choose footwear to accommodate this slightly larger size. The best time for fitting shoes is midday.
- Be sure to walk in and flex the footwear to ensure a proper fit.
- Shoe sizing varies with each manufacturer. Have your feet measured prior to selecting footwear, especially if you suffer from chronic foot problems such as bunions, corns, or hammertoes.
- Right and left foot sizes are often different. Footwear should be fitted to the larger foot.
- Check to ensure that your heel fits with minimum slippage.

- Make sure that the ball of your foot (i.e., the area of protrusion at the base of the big toe) fits well at the widest part of the shoe. Note: If the ball of the foot does not fit well, the footwear size needs to be changed, or a different style needs to be selected.
- Do not expect footwear to stretch to fit your foot. If it does not fit initially, it will not fit later. Protective toe caps do not stretch.
- Select footwear by the fit, not the size marked inside. Sizes can vary among brands and styles.
- Footwear can even vary slightly within the same style.
- Select footwear that conforms to the shape of your foot. Try on various styles to compare the differences in fit and determine the most comfortable fit for your feet.

**Maintenance**

- Check protective footwear before and after each use. If there are any cracks in the soles, breaks in the leather, exposed toecaps, or similar damage that reduces the protective qualities of the footwear, the footwear should be replaced.
- The tread of the footwear should be kept clean in order to maximize slip resistance.
- Refer to the manufacturer’s instructions for proper storage, cleaning, and care of the footwear.
- Deterioration of the footwear occurs over time, even if the footwear is not worn. This deterioration can compromise the safety of the wearer. This deterioration varies based on materials and construction method. This should be considered and discussed with your protective footwear supplier or manufacturer.
- For specific maintenance follow manufacturers’ specifications.
- Inspect footwear after every shift for damage.
- Ensure laces are kept clean and in good condition.

**Storage**

- Keep in a clean and dry area.
- Do not share safety footwear if specifically fitted for personal use.
- Refer to the manufacturer’s instructions for proper storage, cleaning, and care of the footwear.

**Replacement**

- Replace footwear If there are any cracks in the soles, breaks in the leather, exposed toecaps, or similar damage that reduces the protective qualities of the footwear.
- All used protective footwear which is deemed unsafe should be destroyed. Do not recycle it for home use in situations where a danger to feet is present.
- If footwear has been exposed to sole penetration or severe impact, foot protection can be compromised without any outward signs of damage. It is advisable to replace footwear after sole penetration or severe impact to ensure protection in the event of another accident, even if there are no outward signs of damage.
- Replace if worn out and/or damaged in any way irreparable.
- Replace footwear if the sole becomes detached.

**HIGH-VISIBILITY SAFETY APPAREL**

High-visibility safety apparel (HVSA) is needed when work in low light and poor visibility, especially if working around moving vehicles (cars, trucks or other machinery traveling under their own power - e.g., forklifts, backhoes, etc.).

High-visibility items allow person to be seen by the drivers of those vehicles sooner and more readily. This fact increases worker safety at work. The human eye responds best to large, contrasting, bright or moving objects. Worker visibility is enhanced by high color contrast between clothing and the work environment against which it is seen.

High-visibility apparel must be worn when outdoor work activity performed around / in close proximity of moving heavy equipment /vehicle as well as in low light /poor visibility conditions and when coordinating traffic control of heavy equipment or vehicular traffic maneuvering.

Requirement for high visibility clothing shall be identified through Hazard Risk Assessment Process and documented on Safe Job Procedures, and/or Job Hazard Assessments. The CSA standard Z96-15 (High-Visibility Safety Apparel) should be referred to when determining the appropriate level of high-visibility safety apparel.

Employees, subcontractors, and visitors shall wear, clean, store, and maintain their high visibility clothing in compliance with manufacturer’s specification.

Employees, subcontractors, and visitors shall inspect their high visibility clothing each day, prior to first use, to ensure it will provide the intended level of protection.

### Selection

- Large, bright garments are more visible than small ones. Coverage all around the body (360° full body coverage) provides better visibility in all viewing directions.
- Stripes of colours that contrast (have a distinct colour difference) with the background material to provide good visibility. Stripes on the arms and legs can provide visual clues about the motion of the person wearing the garment.
- When background material is bright-coloured or fluorescent material, it is intended to be highly visible, but is not intended to provide retroreflective performance.
- Other requirements such as flame resistance, thermal performance, water resistance, durability, comfort, tear-away features, material breathability and flexibility that are applicable to the job.

The two basic elements of any CSA Z96- 15 HVSA garment are the class of apparel and the level of retroreflection, defined as follows:

**Class of apparel** — the class of high-visibility safety apparel as determined by body coverage. The three classes of apparel are as follows:

- Class 3 provides the greatest body coverage and visibility under poor light conditions and at great distance.
- Class 2 provides moderate body coverage and superior visibility.
- Class 1 provides the lowest recognized coverage and good visibility.

**Note:** *Each high-visibility apparel class is required to cover the torso or limbs, or both.*

**Retroreflective level** — Retroreflective material reflects light produced by the headlights of oncoming traffic back to the vehicle operator. This retroreflected light is focused back at the vehicle operator and is much greater than the light that reflects off other objects, making this material highly visible at night.

The three retroreflective levels are as follows:

- 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.

To comply with the CSA Standard, the HVSA should also meet the following criteria for the stripes/bands:

- A waist-level horizontal stripe/band that goes completely around the HVSA.
- Two vertical stripes on the front passing over the shoulders and down to the waist.
- A symmetric "X" on the back extending from the shoulders to the waist.
- For Class 3 apparel, stripes/bands encircling both arms and both legs are added.

### Inspection

- Pre-use visual inspection of High-Visibility Safety Apparel (HVSA) condition during the Job Hazard Assessment (JHA) prior the task;
- Visually inspect component parts, closures, pockets, high-visibility trim including retroreflective trim; and background material, (e.g., contaminants, fraying, holes, cuts, fading, seam deterioration);
- Check HVSA before and after each use.
- Non-repairable HVSA should be appropriately destroyed or rendered unwearable;

### Use

- For safety and best performance, high-visibility safety apparel (HVSA) should be worn as intended, i.e. done up properly around the body with no loose or dangling components. If an entanglement hazard exists, then in the case of harnesses and vests, HVSA with tear-away capability should be worn.
- All closures should be fastened to ensure conformity to CSA Standard.
- The use of equipment or some personal protective equipment (PPE), such as communication radios, fall protection harnesses and high-top safety boots, might obscure or reduce the effectiveness of the high-visibility safety apparel. If users must use such equipment, the high-visibility elements should either be incorporated into the PPE or the HVSA designed to ensure that these elements remain visible.
- When other PPE is required, it should be worn during the fit evaluation of the high-visibility safety apparel to ensure that there is no interference with the function of either.

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

**Maintenance**

High-visibility safety apparel used in high- and low-temperature environments might undergo adverse functional changes that affect protective performance. Adherence to good maintenance and repair procedures should be maintained.

- High-visibility safety apparel should be inspected, cleaned, maintained, repaired, stored and “removed from service”, in accordance with manufacturer’s instructions (if provided).
- Keep your high-visibility apparel clean and well-maintained. Contaminated or dirty retroreflective materials provide lower visibility.
- Users should inspect their high-visibility safety apparel before and after each use to ensure it is clean and in good condition.
- Inspection should include the following where applicable:
  - condition of component parts, closures, pockets, high-visibility trim including retroreflective trim;
  - background material, e.g., contaminants, fraying, holes, cuts, fading, seam deterioration.

**Storage**

- For optimal performance, high-visibility safety apparel should be kept clean and laundered in accordance with its label care instructions.
- High-visibility safety apparel should be stored and “removed from service”, in accordance with manufacturer’s instructions (if provided).

**Replacement**

- Replace garments that show signs of wear and tear, soiling, or contamination as it will no longer be able to provide acceptable levels of visibility.

## SPECIALIZED PERSONAL PROTECTIVE EQUIPMENT (PPE)

Whenever practicable, workplace hazards shall be eliminated or reduced through the use of engineering, substitution and/or administrative controls. To protect against workplace hazards which continue to exist after all such control measures have been implemented, appropriate mandatory and/or additional specialized PPE shall be used.

When the hazard(s) cannot be removed or controlled adequately the specialized personal protective equipment (PPE) might be used in addition. Specialized PPE does not remove or reduce workplace hazards and does not replace effective engineering or administrative control methods such as substitution or ventilation. PPE is the last line of defence when the hazard cannot be removed or controlled adequately.

Specialized Personal Protective Equipment is protective equipment that is above the mandatory PPE requirements when specific hazards are identified. Proper selection use and care of the equipment are vital to provide the proper level of protection.

Requirements for specialized PPE shall be identified through Hazard Risk Assessment Process as well as based on legislated or other specific requirements i.e., Safety Data Sheet (SDS); Original Equipment Manufacturer (OEM) requirements, CSA standards, Occupational Health & Safety Risk Registry (OHS RR); Construction Hazard Assessment (CHA); Job Hazard Analysis/ Assessment (JHA); Safe Work Practices (SWP) & Safe Job Procedures (SJP); First Aid & Emergency Response preparedness etc.

Depending on Hazard Assessment, task specific arrangements and operations requirements mandatory and / or additional PPE type could be categorized and added as specialized PPE and Govan Brown will ensure that specialized PPE training provided to workers prior to start work which might include, but not limited: High-Visibility Safety Apparel (HVSA) for Traffic Control, Respiratory Protection Equipment, specific type of eye/face, hand, body/limbs and skin protection as well as hearing protection devices and fall protection equipment.

Supervisors are responsible to ensure specialized personal protective equipment for the task being performed is supplied to the worker and that worker wears the specialized personal protective equipment properly when working. Prior to conducting work or being in a PPE prescribed area requiring the use of specialized PPE, workers shall be trained in the following:

- When specialized PPE is necessary;
- What type of specialized PPE is necessary;
- How specialized PPE is to be tested/ inspected and worn;
- What specialized PPE limitations are;
- Proper care, maintenance, life expectancy and disposal of specialized PPE.

Particular attention will be paid to job requirements as some types of hazards require more than one PPE piece.

Specialised PPE should only be used:

- as an interim (short term) measure before controls are implemented;
- where other controls are not available or adequate;
- during activities such as maintenance, clean up, and repair where pre-contact controls are not feasible or effective;
- during emergency situations.

### **Guidelines for users:**

- Specialized Personal Protective Equipment must be identified in Safe Job Procedures and Safe Work Practices, formal training programs, best industry practices, provincial standards and regulations.
- User must demonstrate training prior to use.
- Documented inspection of Specialized Personal Protective Equipment at least once per year.
- Disposed of and replaced Specialized Personal Protective Equipment when found to be defective or not properly functioning.
- Care, maintain and store Specialized Personal Protective Equipment as required by Original Equipment Manufacturer (OEM).
- Inspect specialized PPE before and after each use.
- Take care of specialized PPE at all times and clean all specialized PPE after use.
- Repair or replace damaged or broken specialized PPE.
- Store specialized PPE in clean dry air - free from exposure to sunlight or contaminants.

### **Selection of Specialized PPE:**

- Requirements for specialized PPE shall be identified through Hazard Risk Assessment Process as well as based on legislated or other specific requirements i.e., Safety Data Sheet (SDS); Original Equipment Manufacturer (OEM) requirements, CSA standards, Occupational Health & Safety Risk Registry (OHS RR); Construction Hazard Assessment (CHA); Job Hazard Analysis/ Assessment (JHA); Safe Work Practices (SWP) & Safe Job Procedures (SJP); First Aid & Emergency Response preparedness etc.
- According to regulatory requirements. Must meet minimum protective standards to ensure that the risk to workers is controlled and to prevent injury and illness.



**EYE/FACE PROTECTION**

The risk and danger of flying objects, particles, liquids, sprays, other matter entering the eyes or impact /direct contact creates the potential for eye injury.

Whenever practicable, these hazards shall be eliminated or reduced through the use of engineering and/or administrative controls. To protect against those hazards which continue to exist after all such control measures have been implemented, appropriate eye / face protection must be used. These guidelines are based on the Canadian Standards Association (CSA) Z94.3 "Eye and Face Protectors", CSA Z94.3.1 "Guideline for selection, use, and care of eye and face protectors" and CSA Z462 "Workplace Electrical Safety".

Requirements for specific protective eyewear and face protection shall be identified through Hazard Risk Assessment Process as well as based on legislated or other specific requirements i.e. Safety Data Sheet (SDS); Original Equipment Manufacturer (OEM) requirements, CSA standards, Occupational Health & Safety Risk Registry (OHS RR); Construction Hazard Assessment (CHA); Job Hazard Analysis/ Assessment (JHA); Safe Work Practices (SWP) & Safe Job Procedures (SJP); First Aid & Emergency Response preparedness etc.

Govan Brown will provide appropriate protective eyewear and face shields to employees. Protective eyewear and face shields shall be worn in compliance with manufacturer's specifications.

Employees, subcontractors, and visitors shall clean, store, and maintain their eyewear and face shields in compliance with manufacturer's specification.

Employees, subcontractors, and visitors shall inspect their protective eyewear and face shields each day, prior to first use, to ensure it will provide the intended level of protection.

**Selection**

Lenses: CSA-certified eye and face protectors must meet the criteria for impact resistance as outlined in the standard. Only devices made of approved materials are permitted.

<b>MATERIAL</b>	<b>CHARACTERISTICS</b>
<b>Hi-Vex</b>	More impact resistant than CR39 plastic Available with all surface treatments (coatings) 100% UV filtering Light weight Material is very clear
<b>Polycarbonate</b>	Most impact-resistant of all lens materials Lightweight Can be coated for scratch resistance Most have built-in UV radiation absorption properties
<b>Plastic (CR39)</b>	About one-half the weight of glass Resistant to solvents and pitting
<b>Trivex</b>	More impact resistant than CR39 Plastic Less impact resistant than polycarbonate UV radiation absorption properties
<b>Glass</b>	High-density material resulting in heavy lenses Loses impact resistance if scratched Does not meet impact criteria as set by CSA Z94.3

Refer to Govan Brown PPE matrix for more guidelines on specific class of eye and face protection equipment.

Consult with the Original Equipment Manufacturer about the use and limitations for each type of eye or face protection as well as for specific requirements for components including cover lens / plate and filter lenses.

Markings: The manufacturer or supplier certification mark must be present on all approved safety lenses, frames (front and temple), removable side shields, and other parts of the glasses, goggles, or helmets.

Frames: Safety frames are stronger than street-wear frames and are often heat resistant. They are also designed to prevent lenses from being pushed into the eyes.

Ensure your safety glasses and face shields fit properly. Eye size, bridge size and temple length may vary.

- Temples should be comfortable over the ears. The frame should be as close to the face as possible and the bridge should rest on your nose. It should not be or feel too tight.
- Choose an appropriate eye protector that fits firmly, but not tightly, and that sits as close to the eyes as possible without the eyelashes hitting the lenses.
- Choose an appropriate face protector that fits securely and provides proper coverage for the application.
- Eye and face protectors should never interfere with body movement.
- Do not wear someone else's equipment.

**Inspection**

- Pre-use visual inspection of Eye /Face protection equipment condition during the Job Hazard Assessment (JHA) prior the task;
- Visually inspect component parts, lenses, screens, frames, side shields, attachments (if any);
- Clean dirty lenses/screens and frames; repair frames or replace lenses/screens that are scratched, cracked, pitted, faded at once;
- Check Eye /Face protection equipment condition before and after each use.
- Non-repairable Eye /Face protection equipment condition should be appropriately destroyed or rendered unwearable;

**Use**

- Ensure your safety eye wear fits properly. Shall be worn by employee at all times there is the potential risk of eye injury
- 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.
- Users should be able to see in all directions without any major obstructions in their field of view. Shall be worn by employees while welding, cutting, grinding, while working under vehicles and/or where flying particles are commonly encountered.
- Use of prescription protective eyewear is a recommended for workers who require corrective lenses;
- Properly fitted "over-the-glasses" protectors are to be used of non-CSA eyewear /prescription eyewear;
- Users should be able to see in all directions without any major obstructions in their field of view;
- Eye /face protection should never interfere with body movement.

**Maintenance**

- Clean your devices daily. Follow the manufacturer's instructions.
- Avoid rough handling that can scratch lenses. Scratches impair vision and can weaken lenses.
- Clean dirty lenses and frames; repair frames or replace lenses that are scratched, cracked, pitted, faded, etc. at once.
- Always use water or lens cleaning fluid specific to the lens type as wet method of cleaning will "float" the dirt away, rather than scratching it into the lens;
- Do not alter or modify equipment. Replace worn parts. Lenses and filters that are pitted or scratched should be replaced immediately;

**Storage**

- Store eye/face protection equipment in manner to prevent breakage, unnecessary damage and exposure to harsh environment;
- Clean eye/face protection equipment frequently following the OEM's instructions;
- Store eye/face protection equipment in a clean, dry place between periods of use where it cannot fall and break;
- Store in a safe place where lenses are protected from scratching. Scratches may impair vision and can weaken the lenses, do not use if scratched;
- Do not store in direct sunlight.

**Replacement**

- Replace if there are any cracks or scratches on the lenses, arms or frame;
- Do not alter or modify equipment;
- If you are replacing a part, replace only with identical parts from the same manufacturer;
- Non-repairable safety equipment should be appropriately destroyed or rendered un-wearable.

## HAND / SKIN PROTECTION

The risk and danger of exposure to corrosive or toxic materials, materials of unknown toxicity, sharp objects and materials of extreme hot and cold temperatures creates the potential for hand / skin injury.

Appropriate protective hand, arm and skin protection must be worn in all situations where the hands or skin are potentially exposed to workplace hazards such as chemicals, infectious agents, cuts, lacerations, abrasions, punctures, burns and harmful temperature extremes.

Whenever practicable, these hazards shall be eliminated or reduced through the use of engineering and/or administrative controls. To protect against those hazards which continue to exist after all such control measures have been implemented, appropriate hand protection must be used. These guidelines are based on the Canadian Centre for Occupational Health and Safety guidelines and documentation.

Requirements for specific protective hand protection shall be identified through Hazard Risk Assessment Process as well as based on legislated or other specific requirements i.e., Safety Data Sheet (SDS); Original Equipment Manufacturer (OEM) requirements, CSA standards, Occupational Health & Safety Risk Registry (OHS RR); Construction Hazard Assessment (CHA); Job Hazard Assessment (JHA); Safe Work Practices (SWP) & Safe Job Procedures (SJP); First Aid & Emergency Response preparedness etc.

Govan Brown will provide appropriate and adequate hand / skin protection equipment to employees which shall be worn where and as required.

All Govan Brown employees, subcontractors, and visitors shall wear suitable appropriate and adequate hand / skin protection equipment where worker exposed to the hazard of injury from contact of the worker's skin with a noxious gas, liquid, fume or dust; a sharp or jagged object which may puncture, cut or abrade the worker's skin; a hot object, hot liquid or molten metal; or radiant heat

Employees, subcontractors and visitors shall select, clean, store and maintain appropriate and adequate hand / skin protection equipment in compliance with OEM specification, guidelines and recommendations.

### Selection

Hand / skin protection equipment should not be considered as a replacement for engineering control methods. However, there are often few alternatives available, or an emergency (e.g., a spill) requires their use. Since the hand / skin protection equipment is the last line of defense for protecting the skin, care must be taken to ensure it provides the protection expected.

Information specifying the best type of hand / skin protection material should be on the SDS (e.g., neoprene, butyl rubber). If this information is missing, contact the supplier or manufacturer of the product. Manufacturers of chemical protective gloves and clothing may also assist their customers in making the appropriate choices.

Identify all hazards that may require hand / skin protection including identification of the chemicals involved as well as physical hazards such as abrasion, tearing, puncture, fire/flames, temperature, and/or biological hazards. The kind of hazards present will also affect the decision to use other additional protective equipment or combination of them. Check the Safety Data Sheet and other sources for information.

Determine the flexibility and touch sensitivity needed for the task. This need may significantly limit the thickness of glove material that can be used. The requirement for textured or non-slip surfaces to improve grip must also be considered.

Know the type of potential contact (e.g., occasional contact or splash protection or continuous immersion of hands). This contact will also help in choosing the appropriate length of the hand / skin protection equipment.

Determine the contact period. How long the worker could be in contact with the chemical (and which chemicals) may also influence the selection of type and thickness of the hand / skin protection equipment material and the choice equipment.

Determine the potential effects of skin exposure. The immediate irritation or corrosion of the skin must be considered in addition to the potential health effects to the entire body from absorbing the chemical through the skin.

Consider what hazards may be presented by the use of the protective clothing itself. For example, protective clothing can contribute to heat stress; reduced dexterity; rip or tactile functions; poor comfort; or may contribute to skin conditions.

Consider the decontamination procedures and whether the hand / skin protection equipment should be disposed.

Suggested materials should be selected based on quantitative information such as permeation rate, breakthrough time, penetration and degradation, and the other considerations mentioned above. Various factors like the thickness of the material, manufacturing methods, and product quality control can have a significant effect on these properties.

When selecting gloves, always refer to the product safety data sheet (SDS) for the specific glove type. No single glove material will protect against all chemicals. Different glove materials interact differently with different types of chemicals. It is therefore important to match the right glove material to the type of chemical(s) being used. Natural rubber latex gloves may be suitable for dilute aqueous solutions; however, oils, greases and many organic solvents will easily permeate the latex material. Nitrile gloves may be used against oils and greases but are generally unsatisfactory for use against aromatic or halogenated solvents.

No glove material is totally impermeable. Glove materials only temporarily resist chemical breakthrough, and the chemical will permeate through the glove material over time. Even the best chemically resistant glove will break down after repeated chemical exposures.

Glove performance can vary with product and manufacturer. Chemical resistance of a particular type of glove material (e.g., nitrile) can vary significantly from product to product, and from manufacturer to manufacturer. The degree of protection will depend on factors related to the specific glove itself, including its chemical make-up, thickness, design, and method of construction. It is important to compare performance data from individual manufacturers.

**GUIDE TO THE SELECTION OF HAND / SKIN PROTECTION:**

HAZARD	DEGREE OF HAZARD	PROTECTIVE MATERIAL
Abrasion	Severe	Reinforced heavy rubber, staple-reinforced heavy leather
	Less Severe	Rubber, plastic, leather, polyester, nylon, cotton
Sharp Edges	Severe	Metal mesh, staple-reinforced heavy leather, Kevlar®
	Less Severe	Leather, terry cloth (aramid fiber)
	Mild with delicate work	Lightweight leather, polyester, nylon, cotton
<b>* NOTE *</b> <i>As per GB Glove Policy standard glove criteria is a cut resistance level A4 or higher (ANSI/ISEA 105). Any existing stock of A3 cut resistance level gloves may be exhausted before replacing with A4</i>		
Chemicals and fluids	Risk varies according to the chemical, its concentration, and time of contact among other factors. Refer to the manufacturer, or product SDS.	Dependent on chemical. Examples include: Natural rubber, neoprene, nitrile rubber, butyl rubber, polyvinyl chloride, polyvinyl alcohol, Saranex™, Tychem®, Trelchem®
Cold		Leather, insulated plastic or rubber, wool, cotton
Heat	High temperatures (over 350 deg C)	Asbestos
	Medium high (up to 350 deg C)	Nomex®, Kevlar®, neoprene-coated asbestos, heat-resistant leather with linings
	Warm (up to 200 deg C)	Nomex®, Kevlar®, heat-resistant leather, terry cloth (aramid fiber)
	Less warm (up to 100 deg C)	Chrome-tanned leather, terry cloth
Electricity		Rubber-insulating gloves and mitts tested to appropriate voltage (CSA Standard Z259.4-M1979) with leather outer glove
General Duty		Cotton, terry cloth, leather
Product Contamination		Thin-film plastic, lightweight leather, cotton, polyester, nylon
Radiation		Lead-lined rubber, plastic or leather

*Note: The mention of trade name products in the above table is not intended as a recommendation or endorsement of any product.*

**CHEMICAL RESISTANCE & PHYSICAL PROPERTIES OF COMMON GLOVE MATERIALS**

The following table is intended to be used only as a general guideline during glove selection. Always consult the glove manufacturer's chemical resistance and physical properties test data on specific glove products.

GLOVE MATERIAL	CHEMICAL RESISTANCE PROPERTIES		PHYSICAL PROPERTIES						
			E: Excellent	G: Good	F: Fair	P: Poor			
	Recommended For use with	Not recommended for use with	Abrasion resistance	Cut resistance	Flexibility	Heat resistance	Ozone resistance	Puncture resistance	Tear resistance
Natural rubber latex	Acids, bases, alcohols, aqueous solutions.	Oils, greases, organics.	E	E	E	F	P	E	E
Butyl rubber	Aldehydes, ketones, esters, glycol ethers, polar organic solvents.	Hydrocarbons, chlorinated solvents.	F	G	G	E	E	G	G
Neoprene	Oxidizing acids, caustics, alcohols, oils, fats, aniline, phenol, glycol ethers.	Chlorinated hydrocarbons.	E	E	G	G	E	G	G
Nitrile	Oils, greases, acids, caustics, aliphatic chemicals.	Aromatics, many ketones, esters, many chlorinated solvents.	E	E	E	G	F	E	G
Polyvinyl alcohol (PVA)	Aliphatics, aromatics, chlorinated solvents, ketones (except acetone), esters, ethers.	Acids, alcohols, bases.	F	F	P	G	E	F	G
Polyvinyl chloride (PVC)	Strong acids and bases, salts, other aqueous solutions, alcohols, glycol ethers.	Aromatics, hydrocarbons, chlorinated solvents, aldehydes, ketones, nitrocompound.	G	P	F	P	E	G	G
Fluoroelastomer (Viton®)	Aromatic and chlorinated solvents, aliphatics and alcohols.	Some ketones, esters, amines.	G	G	G	G	E	G	G
Silver Shield™ (Norfoi™, 4HTM)	Wide range of solvents, acids and bases.		F	P	E	F	E	F	E

(Adapted from the ACGIH Guidelines for the Selection of Chemical Protective Clothing)

**Inspection**

- Pre-use visual inspection of Hand/Skin protection equipment condition during the Job Hazard Assessment (JHA) prior the task;
- Visually inspect material and component for discoloration, holes, stiffness, and tears;
- Test all rubber or synthetic gloves for pin holes or leaks by inflating them;
- Know how to remove, and either clean or dispose of used equipment, as appropriate;
- If the equipment is not at an acceptable level of quality to provide adequate safety protection, it should be discarded and replaced;

**Use**

- Inspect hand / skin protection equipment for discoloration, holes, stiffness, and tears before each use.
- If the hand / skin protection equipment is not at an acceptable level of quality to provide adequate safety protection, it should be discarded and replaced.
- Inflate rubber gloves in order to test for leaks.
- Ensure that hand / skin protection equipment is properly fitted to allow for as much dexterity and mobility.
- The duration of which hand / skin protection equipment may be used depends on the specific glove characteristics such as thickness and permeation rate.
- Always remove gloves before eating or drinking.
- If transporting chemicals, be mindful not to touch any body parts, doorknobs, elevator buttons, etc. with gloves on to avoid chemical contamination. Gloves should be used only for the task it is required for (i.e., do not perform miscellaneous tasks such as eating, answering the phone with a glove on).
- Remove gloves using a glove-to-glove/skin-to-skin technique:
  - First, grasp the outside of one glove at the palm.
  - Peel glove away from the palm toward the fingers, rolling the glove inside-out. Be careful not to touch your skin with your gloved hand. The contamination is now on the inside. Ball the glove up and hold in your other gloved hand.
  - Carefully slide the un-gloved index finger inside the wrist band of the gloved hand. Try and avoid touching the outside of the glove because that is the contaminated region.
  - Gently pull outwards and down toward the fingers, removing the glove inside out.
  - Pull the glove down so that the first glove ends up inside the second glove and no part of the outside is exposed. Throw away both gloves in an appropriate container. Perform hand hygiene.
- Wash hands directly after each use of hand / skin protection equipment.
- Disposable gloves should be replaced frequently and should never be reused.
- Hand washing and other personal hygiene practices are important measures for preventing or reducing contact with chemical contaminants.

**Maintenance**

- Will vary based on hand / skin protection equipment type. Follow manufacturer's specifications and recommendations;
- Some hand / skin protection equipment will be disposed of after use further direction will be provided based on specific tasks;
- Inspection and care of chemical resistant hand / skin protection equipment should be routinely conducted;
- Chemical resistant gloves will break down after repeated chemical exposures, and should be inspected each time they are reused;
- Reusable gloves should be thoroughly rinsed and allowed to air dry;
- Hand / skin protection equipment should be replaced on a regular and frequent basis. It should be replaced immediately upon signs of degradation, and particularly after contact with toxic chemicals.

**Storage**

- Keep hand / skin protection equipment stored in a safe place;
- Store hand / skin protection equipment in manner to prevent breakage, unnecessary damage and exposure to harsh environment;
- Clean hand / skin protection equipment as instructed by the supplier between periods of use;
- Know how to remove, and either clean or dispose of used hand / skin protection equipment, as appropriate;
- Store reusable hand / skin protection equipment in a way that prevents external exposure (i.e. sealed Ziploc bag) and follow the manufacturer's instructions.

**Replacement**

- Know how to remove, and either clean or dispose of used gloves, as appropriate;
- If the hand / skin protection equipment is not at an acceptable level of quality to provide adequate safety protection, it should be discarded and replaced. Replace if there are any rips, tears in the glove.

**HEARING PROTECTION**

Requirement for specific hearing protection shall be identified through Hazard Risk Assessment Process as well as based on legislated or other specific requirements i.e., Safety Data Sheet (SDS); Original Equipment Manufacturer (OEM) requirements, CSA standards, Occupational Health & Safety Risk Registry (OHS RR); Construction Hazard Assessment (CHA); Job Hazard Assessment (JHA); Safe Work Practices (SWP) & Safe Job Procedures (SJP); First Aid & Emergency Response preparedness etc.

Hearing protection must be used in areas noise levels meet or exceed 85dBA according to O. Reg. 381/15. Double hearing protection is required in areas where noise levels meet or exceed 100dbA.

**Specific to Province of Alberta:** The threshold for conducting a noise exposure assessment is reduced from 85 decibels (dBA) to 82 dBA to ensure noise is assessed before the occupational exposure limit is exceeded.

Hearing protection shall consist of ear plugs or earmuffs with a Noise Reduction Rating (NRR) of 25 or more. Double hearing protection shall consist of each ear plugs and earmuffs with an NRR rating of 25 or more.

Govan Brown will provide appropriate hearing protection. Hearing protection shall be worn in compliance with manufacturer’s specifications. Ensure that the use of the protector does not interfere, or interferes minimally with the use of other PPE or devices;

Employees, subcontractors, and visitors shall clean, store, and maintain their hearing protection in compliance with manufacturer’s specification.

Employees, subcontractors, and visitors shall inspect their hearing protection each day, prior to first use, to ensure it will provide the intended level of protection.

**Selection**

Appropriate hearing protection must be worn must be worn by workers in all areas whenever there is a hazard of hearing injury. There are three basic types of ear protection:

- Earplugs - inserted to block the ear canal; may be pre-molded or mouldable (foam ear plugs). Ear plugs are sold as disposable products or reusable plugs.
- Semi-insert ear plugs - consist of two ear plugs held over the ends of the ear canal by a rigid headband.
- Earmuffs - consist of sound-attenuating material and soft ear cushions that fit around the ear and hard outer cups. They are held together by a headband.

Choose HPD that adequately protects from the noise/sound hazard(s) of a specific job and with adequate Noise Reduction Rating (NRR);

HPD’s may also be selected based on their CSA class. This method uses the letters A, B, or C to describe the range of reduction in sound level provided by an HPD.

Guidelines for proper selection of HPDs based on class and noise exposure, presuming a desired effective exposure of LEX, 8h = 85 dBA when HPDs are worn.

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

*\* Note: AL or BL class HPDs meet the requirements for either Class A or Class B and have a minimum attenuation of 20 dB at 125 Hz.*

Dual hearing protection is required (Class B earmuff and Class A ear plug) with limited exposure duration.

Hearing protection devices (HPD) shall be assembled, fitted, and used in accordance with:

- Original Equipment Manufacturer (OEM) instructions;
- Legislative requirement;
- Company H&S Program Manual PPE Policy & Procedures.

**Inspection**

- Pre-use visual inspection of Hearing protection equipment condition during the Job Hazard Assessment (JHA) prior the task;
- Visually inspect material and component for discoloration, holes, stiffness, and tears;
- Check if components lose their shape, become hard or brittle, show evidence of cracks, or otherwise lose their performance qualities.
- Check if earplugs degraded or harden due to continuous exposure to ear canal wax, perspiration, or chemical contaminants.;
- If the equipment is not at an acceptable level of quality to provide adequate safety protection, it should be discarded and replaced;

**Use**

- HPD shall be worn at project site, shop /yard task specific when the noise or sound level at the workplace exceeds 85 decibels (A-weighted) or dBA and in cases where users are operating heavy machinery or devices that produce loud noises that exceed 85 dBA as determined on:
  - Original Equipment Manufacturer (OEM) and Legislative requirement;
  - Occupational Health & Safety Risk Registry (OHS RR) / Construction Hazard Assessment (CHA)/ Job Hazard Analysis/ Assessment (JHA);
  - Safe Work Practice (SWP) / Safe Job Procedure (SJP);
- Inspect and test equipment for defects before using;
- Ensure earplugs are placed in or against the entrance of the ear canal to form a seal and block sound (insert or semi-insert);
- Earplugs shall be fitted snugly (but not so tightly as to cause discomfort) in the ear canal;
- Earmuffs are rigid moulded plastic earcups that seal around the ear using foam (fluid) or gelfilled cushions composed of a bladder combined with a layer of foam;
- Earmuffs should provide an airtight seal between the cushion and the head; therefore, hair, jewellery, or clothing shall not be worn in such a manner as to be caught between the cushion and the head;
- Double hearing protection must be used where 8-hr equivalent noise exposure levels exceed 105 dBA.

**Maintenance**

- Will vary based on HPD type. Follow manufacturer's specifications and recommendations;
- No HPD alteration allowed i.e., drilling holes in earcups, reducing headband tension of earmuffs, or trimming or removing flanges on pre-moulded earplugs since this seriously compromises effectiveness;
- Reusable devices shall be cleaned regularly; Users of both disposable and reusable earplugs shall be aware that hands need to be clean when inserting and removing earplugs. Contaminated earplugs can cause ear irritation or infection.

**Storage**

- Store HPD in manner to prevent breakage, unnecessary damage and exposure to harsh environment;
- In order to function properly, the HPD shall be cleaned and stored as recommended by the manufacturer. Clean equipment as instructed by the supplier between periods of use;
- Inspect and test equipment for defects before using;
- Know how to remove, and either clean or dispose of used equipment, as appropriate;
- Store reusable equipment in a way that prevents external exposure (i.e. sealed Ziploc bag) and follow the manufacturer's instructions.

**Replacement**

- Inspect equipment for discoloration, holes, stiffness, and tears during the Job Hazard Analysis / Assessment (JHA) prior the task;
- Earmuff cushions shall be replaced in accordance with the manufacturer's instructions as soon as they lose their shape, become hard or brittle, show evidence of cracks, or otherwise lose their performance qualities;
- Some earplugs degrade or harden when exposed continuously to ear canal wax, perspiration, or chemical contaminants.



## RESPIRATORY PROTECTION

Although elimination or reduction of respiratory hazards through substitution or engineering controls is preferred, there may be instances in which workers require the use of appropriate respiratory protection for work, which involves exposure to potentially hazardous environments, such as oxygen- deficiency or airborne contaminants (dusts, fumes, mists, gases, vapours, aerosols). These guidelines are based on the Canadian Standards Association (CSA) Standard Z94.4 "Selection, Use and Care of Respirators".

Requirement for specific respiratory protection equipment shall be identified through Hazard Risk Assessment Process and documented on Safe Job Procedures, Job Hazard Assessments. Specific requirements could be also identified in legislation, equipment manufacturer recommendations and CSA standards.

Respiratory protective devices vary and are used to protect a worker from contact with airborne contaminants such as dusts, fumes, fogs, mists, gases, vapours, and aerosols or an oxygen-deficient environment. Respirators may be air-purifying or air-supplying devices. It is essential the wearer be properly instructed for safe use and fit. Respiratory Protection Equipment is selected based on nature of risk and equipment should meet appropriate CSA Standard.

The two main types are air-purifying respirators (APRs) and supplied-air respirators (SARs).

Air-purifying respirators (APRs):

- particulate respirators (also called dust, fume, and mist respirators or masks);
- chemical cartridge respirators that can have a combination of chemical cartridges, along with a dust pre-filter. This combination provides protection against different kinds of contaminants in the air;
- gas masks (contain more adsorbent than cartridge-type respirators and can provide a higher level of protection than chemical cartridge respirators);
- powered air-purifying respirators (PAPRs).

Supplied-air respirators (SARs):

- self-contained breathing apparatus (SCBA);
- airline supplied-air respirators;
- protective suits that totally encapsulate the wearer's body and incorporate a life-support system.

There are different classes of particulate filters, depending on the particulate material. They are also classified based on levels of oil resistance and filter efficiency. Oil can break down certain types of filters which means it is important to know the materials you are working with at all times and always select the right cartridge for your respirator.

The main categories are:

- N series (Not resistant to oil) - May be used in any atmosphere where there is no oil particulate.
- R series (Resistant to oil) - May be used in any atmosphere where there is no oil particulate, or up to one shift where there is oil particulate present. "One shift" means eight hours of continuous or intermittent use.
- P series (Oil-Proof) - May be used in any atmosphere, including those with oil particulates, for more than one shift. If the filter is used in atmospheres with oil particulates, contact the manufacturer to find out the service life of the filter.

There are many different types and sizes of disposable respirators or dust masks available so be sure to find one that is comfortable for you. Also ensure you only select a product with NIOSH or CSA Group certification. These respirators should be discarded after one use.

Prior to using any respirator on site, employees will be adequately trained on the selection, use and care of respiratory protective equipment and fit test must be completed by competent personnel.

### Selection

- The fit test shall be used to verify the selection of the specific make, model, and size of a tight-fitting respirator for individual users;
- Respirators requiring a tight fit shall not be worn when an effective seal to the face or neck of the person cannot be achieved and maintained;
- The respirator user shall check the seal of the facepiece immediately after donning the respirator, by OEM recommended procedures (negative pressure check & positive pressure check)

Before using or handling a hazardous product, consult the Safety Data Sheet (SDS) for the type of respiratory protection required. When selecting the proper respirator for a particular job, know and understand:

- The characteristics of the contaminant(s)
- The anticipated exposure conditions
- The performance limitations of the equipment
- Any legislation that applies

The degree of protection depends on the type of respirator, style of facepiece, and principle of operation. It is also important to realize that facial hair and deep facial scars can interfere with the seal between respirator and face.

Air-purifying respirators (APRs)

- particulate filtering facepiece with minimum filter efficiency N95 (also called dust, fume and mist respirators or masks)
- particulate-removing respirators equipped with filters to remove particulate matter from the air
- vapour-removing respirators and gas-removing respirators equipped with cartridges or canisters to remove a single vapour or gas, a single class of vapours or gases (e.g., organic vapour), or a combination of two or more classes of vapours and gases from the air

Supplied-air respirators (SAR)

- self-contained breathing apparatus (SCBA)
- airline supplied-air respirators
- supplied-air suits

Main respiratory inlet configurations:

- half-facepiece respirator;
- loose-fitting facepiece for powered air;
- full-facepiece respirator that provides eye and face protection in addition to respiratory protection;
- tight-fitting hood;
- helmet or hood for powered air.

Filters categories:

N series (Not resistant to oil) - May be used in any atmosphere where there is no oil particulate;

R series (Resistant to oil) - May be used in any atmosphere where there is no oil particulate, or up to one shift (i.e. means eight hours of continuous or intermittent use) where there is oil particulate present;

P series (Oil-Proof) - May be used in any atmosphere, including those with oil particulates, for more than one shift. If the filter is used in atmospheres with oil particulates, contact the manufacturer to find out the service life of the filter.

Generally, supplied-air respirators provide better protection than air-purifying respirators; full-face masks provide better protection than half-face masks; and positive pressure devices provide more protection than negative-pressure types.

### Inspection

- Pre-use visual inspection of Respiratory protection equipment condition during the Job Hazard Assessment (JHA) prior the task;
- Visually inspect equipment and condition of component parts (e.g., facepiece, helmet, hood, suit, head harness, valves, connecting tubes, harness assemblies, filters, cartridges, canisters, cylinders), tightness of connections, end-of-service-life indicator, shelf-life dates and proper functioning of regulators, alarms, and other warning systems;
- Check components to ensure that sealing surface clean and free of cracks and holes; rubber and elastic parts have good pliability and no signs of deterioration, inhalation and exhalation valves are clean and seated properly, straps are sufficiently elastic and free of worn areas, face mask/ face shield is cleaned and clear (no smudges, scratches, or other damage that may impede visibility)
- Ensure that the filter and mask are certified for use together, check the filter to see that they are approved for the hazard.
- Inspect both the filter threads and facepiece threads for wear, make sure they are screwed together properly, and there is no cross threading, check the filter housing for cracks or dents and check the end of service life indicator for gas masks. Check the expiration date.
- Check that pressure gauges of all breathing gas cylinders in service indicate that the cylinders are within the "Full" range;
- Cylinders with gauges indicating less than the "Full" range shall be recharged in accordance with the manufacturer's instructions;
- If respirator does not pass the inspection, the respirator shall be tagged and removed from service;
- After each use of a cylinder and before it is refilled, a qualified person shall inspect its exterior for signs of external damage;
- Cylinders showing signs of external damage shall be immediately depressurized and removed from service and, prior to return to service, inspected in accordance with the requirements;
- If the equipment is not at an acceptable level of quality to provide adequate safety protection, it should be discarded and replaced;

**Use**

- Ensure that respirator's mask is well adjusted to your face. Very often, men are required to be clean-shaven before using the device. Learn how to adjust the mask on your face and how to remove it and check the adjustments and seals before putting the mask on. Once you have the mask on, check the seals using the method established by your employer;
- If respirator does not pass the inspection, the respirator shall be tagged and removed from service;
- Destroy dust masks when discarded. Break straps or tear the respirators to make them unusable;
- Temples on eyeglasses or any other materials such as hair, cloth, tissue, straps, or jewellery shall not come between the skin and the sealing surface of the facepiece or interfere with the operation of the respirator;
- Air-purifying respirators shall not be used where the oxygen content of the air is less than the equivalent of 19.5%;
- Respirator users shall not remove their facepieces at any time while working in Immediately Dangerous to Life or Health (IDLH) atmosphere;
- Particulate filters shall be replaced if they become damaged or unhygienic or based on the OEM's change-out schedule;
- Respirators shall be cleaned and sanitized according to the respirator OEM's instructions; Respirators designed not to be cleaned shall be disposed of after use as directed by the OEM;
- Never reuse disposable respirators or masks; Decontaminate used respirators and masks before disposal.
- Respirator must be worn when sanding, spraying, grinding and when using certain aerosols, glues, cleaners or painting in paint shop and/or in the wash bay as well as in dusty environments;
- Must refer to SDS for all chemicals which will identify applicable PPE and respiratory requirements;
- Record of training to be provided for fit-test. Completion of equipment checklist in terms of a circle checks methods by worker daily per use for the half-mask.

**Maintenance**

- Follow the OEM's instructions for proper cleaning, inspecting, maintenance, repair and storage of respirators;
- Disposal as per manufacturer guideline. Half-mask to be returned to Govan Brown Site Office / Foreman or designated area for storage to breakage and dulling potential;
- Never use solvents to clean respirators;
- Rinse with clean water and allow to air dry;
- Record all repairs and/or inspections to any equipment.

**Storage**

- Respirators shall be stored in a manner that will protect them against dust, ozone, sunlight, heat, extreme cold, excessive moisture, vermin, damaging chemicals, oils, greases, or any other potential hazard that can have a detrimental effect on the respirator;
- Respirators must not be left out on a bench or hanging on a nail in the shop where they can gather dust and dirt or be damaged or abused;
- Always keep in a plastic sealed bag to ensure kept clean. Keep stored at room temperature.

**Replacement**

- Inspect equipment for discoloration, holes, stiffness, and tears during the Job Hazard Assessment (JHA) prior the task. All pieces must fit snug without being rippled or distorted;
- If you are replacing a part, replace only with identical parts from the same manufacturer.
- If respirator does not pass the inspection, the respirator shall be tagged and removed from service;
- Destroy dust masks when discarded. Break straps or tear the respirators to make them unusable;
- Inform supervisor if need replacement.

**FALL PROTECTION/ EMERGENCY RESPONSE & RESCUE/CONFINED SPACE ENTRY EQUIPMENT**

Requirement for specific fall protection equipment and emergency response & fall arrest rescue / confined space entry equipment shall be identified through Hazard Risk Assessment Process as well as based on legislated or other specific requirements i.e. Safety Data Sheet (SDS); Original Equipment Manufacturer (OEM) requirements, CSA standards, Occupational Health & Safety Risk Registry (OHS RR); Construction Hazard Assessment (CHA); Job Hazard Analysis / Assessment (JHA); Safe Work Practices (SWP) & Safe Job Procedures (SJP); First Aid & Emergency Response preparedness etc.

Fall protection equipment and emergency response & fall arrest rescue / confined space entry equipment shall be worn in compliance with manufacturer's specifications and local regulations O.Reg. 213/91 sections 26.1-26.9.

Employees, subcontractors, and visitors shall clean, store, and maintain their fall protection equipment and emergency response & fall arrest rescue / confined space entry equipment in compliance with manufacturer's specification.

Employees, subcontractors, and visitors shall inspect their fall protection equipment and emergency response & fall arrest rescue / confined space entry equipment each day, prior to first use, to ensure it will provide the intended level of protection.

**Selection**

- Fall protection equipment and emergency response & fall arrest rescue / confined space entry equipment are to be selected based on nature of risk and equipment should meet appropriate CSA Standard
- Ensure adequate conditions are maintained and equipment proper fits
- Fall protection equipment and emergency response & fall arrest rescue / confined space entry equipment shall be assembled, fitted and used in accordance with Original Equipment Manufacturer (OEM) instructions and Legislative requirement;
- Choose fall protection equipment and emergency response & fall arrest rescue / confined space entry equipment that adequately protects from the hazard(s) of a specific job or allocated for emergency response and adequately meets the specific tasks requirements.

**Inspection**

- Pre-use visual inspection of Fall protection equipment and emergency response & fall arrest rescue / confined space entry equipment condition during the Job Hazard Assessment (JHA) prior the task;
- Visually inspect equipment and condition of component parts (e.g., harnesses, lanyards, energy absorbers and connectors, lifelines;
- Check components for fraying, kinking, and loose or broken stitching and look for rust, cracks, and damage to the hardware parts.
- All connectors shall be checked to ensure that they are compatible with one another.
- Ensure that the locking mechanism is properly engaged.
- Inspect the connector for excess deformation, wear, corrosion, or any other defect that might cause malfunction, breakage, or disengagement.
- Ensure fall protection equipment and emergency response & fall arrest rescue / confined space entry equipment, components and parts is assembled according to the manufacturer's instructions, inspected by the competent user before each use and documented.
- In addition, equipment to be inspected by competent person/certified 3rd party at least annually when equipment used infrequently / moderately with fair storage conditions, used indoor and extended outdoor; used in all temperatures, clean or dusty environments;
- If any defects are found, a competent person shall inspect the device and determine if it is suitable for service, repaired, removed, or otherwise as specified by the OEM; A written record of such inspection and approval for continued use should be retained.

**Use**

- Competent workers only with adequate training must select the components, materials, anchorage and anchorage connectors to match the system application, the work, workplace hazards;
- Only components that are fully compatible with one another should be used as fall arrest systems are designed and tested as complete systems and should be used in this way;
- Surfaces that can come in contact with tearable materials or that might cause injury to the user shall be free of burrs, pits, sharp edges, and rough surfaces;
- Determine the necessary locations of anchorages to assure that the user will be continuously connected when exposed to hazards of falling. Select anchorages that are stable and have the strength required. Carefully select the locations of the anchorages to:
  - Reduce possible free fall distance.
  - Prevent swing fall hazards.
  - Provide clear space in the potential fall paths to avoid striking an object.
  - Capable for emergency rescue / confined space entry.
- Do not select anchorage locations that will require the user to work above the anchor as this will increase the potential free fall and total fall distances.

**Travel restraint arrangements (Fall not possible):**

- A combination of anchorage location and lanyard/lifeline length, which does not physically permit the user to reach an unprotected opening, edge or other fall hazard. The system shall be arranged to prevent the torso from going over the open edge.

**Fall restrict:**

- A combination of a work-positioning system, full body harness and fall restricting equipment.

**Fall arrest (Free fall possible):**

- A combination of anchorage location, full body harness, lanyard/ lifeline or fall arrester assembly from where a free fall may occur. Lanyard assembly or fall arrester will limit fall forces in situation in which a free fall is possible.

**Emergency fall arrest rescue/Confined space entry**

- A combination of anchorage location, full body harness, lanyard/ lifeline or fall arrester assembly as well as self retracting devices/ equipment for specific application.

Equipment and systems that have arrested a fall, show a defect, or do not function correctly shall be tagged and removed from service immediately.

**Maintenance**

- Follow manufacturer’s specifications and recommendations;
- Personal equipment (including harnesses, lanyards, and connectors) and fall-protection systems (including common use devices, self retracting devices and emergency rescue devices) shall be inspected by the competent user before each use during the Job Hazard Analysis / Assessment (JHA) prior the task;
- Personal equipment (including harnesses, lanyards, and connectors) and fall-protection systems (including common use devices, self retracting devices and emergency rescue devices) shall be inspected by the competent user before each use and documented in Daily Fall protection inspection form and Confined space Entry permit as required;
- In addition, equipment to be inspected by competent person/certified 3rd party at least annually when equipment used infrequently / moderately with fair storage conditions, used indoor and extended outdoor; used in all temperatures, clean or dusty environments;
- Equipment might be inspected more frequently in case it is used under harsh conditions or higher frequency and OEM’s instructions on inspection type and frequency shall take precedence over the above recommended frequencies;
- Annual inspections by a competent person/certified 3rd party to be documented in Annual Fall protection inspection form or in other forms provided by certified 3rd party/ supplier;
- Service is performed by the OEM or its approved service agent and is based on usage and environment;
- All users shall be trained in carrying out a pre-use inspection;
- If any defects are found, a competent person shall inspect the device and determine if it is suitable for service, repaired, removed, or otherwise as specified by the OEM;
- A written record of such inspection and approval for continued use should be retained.

**Storage**

- Fall prevention/fall protection/emergency rescue equipment and its components shall be stored in accordance with Original Equipment Manufacturer (OEM) instructions;
- Follow the OEM’s instructions for proper cleaning, inspecting, maintenance, repair and storage of Fall prevention/fall protection/emergency rescue equipment and its components;
- Equipment shall be air-dried at ambient temperature prior to storage;
- Items made from synthetic materials shall be stored in a cool, dry place and away from direct sunlight;
- Storage practices shall ensure that equipment is protected from deterioration due to
  - excessive heat;
  - humidity;
  - ultraviolet light (UV) exposure;
  - moisture;
  - contact with sharp edges;
  - corrosive substances; and
  - other possible causes of damage

**Replacement**

- Replacement in accordance with the manufacturer guidelines;
- Inspect equipment for discoloration, holes, stiffness, and tears during the Job Hazard Assessment (JHA) prior the task;
- If you are replacing a part, replace only with identical parts from the same manufacturer;
- If equipment does not pass the inspection, the equipment shall be tagged and removed from service;
- Inform supervisor if need replacement.

**COMMUNICATION**

- Govan Brown Personal Protective Equipment Policy, Program and Procedures located in the Govan Brown health and safety binder and be posted in the workplace H&S safety Boards.
- Govan Brown's Personal Protective Equipment Policy, Program and Procedures will be communicated to all new Govan Brown workers, supervisors, and managers through new employee general orientation or site-specific induction and/ or through periodic management and staff safety meetings or toolbox talk meetings.
- All existing Govan Brown staff will receive orientation through the OHS Program / Occupational Health and Safety Management System (OHSMS) orientation and /or through Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC)/Joint Occupational Health and Safety Committee (JOHSC) communication and periodic management and staff safety meetings as well as through periodic and ongoing safety training, internal communication protocols or structured training sessions.
- This procedure will be made available at the point of use to workers, subcontractors and suppliers upon request.

**TRAINING**

- All new managers, supervisors, and workers will receive training Govan Brown Personal Protective Equipment Policy, Program and Procedures during their on-boarding training upon hire.
- All new employees will receive awareness training as part of their orientation on their specific health and safety roles and responsibilities through the new hire orientation process.
- All existing employees will receive training on their health and safety roles and responsibilities through periodic staff OHS Program / Occupational Health and Safety Management System (OHSMS) orientation safety meetings as well as through periodic and ongoing safety training or structured training sessions.
- Verification of training will be confirmed via sign off and may include knowledge verification testing.
- Workers required to utilize fall protection shall receive training on how to properly wear, inspect and utilize fall protection during an approved Working at Heights/Fall Protection training program.
- Workers required to wear respirators will receive fit testing.

**EVALUATION**

- This procedure will be reviewed on annual basis by Senior Management and /or during the annual OHS Program / Occupational Health and Safety Management System (OHSMS) internal audit and maybe changed due to business needs, any legal requirements and based on the results of the evaluation to ensure it continues to meet OHS regulation and standards and to ensure it is relevant with current operations and any changes will be indicated in the meetings minutes or reflected on the revision page.
- The Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) and management will also be involved with the evaluation by analyzing forwarded items of concern and suggesting corrective action.
- On a yearly basis, management will review OHS Program / Occupational Health and Safety Management System (OHSMS) to assess whether it is still compliant with current regulations and with the current work environment. If necessary and if required procedure will be amended to reflect the current operation.
- After the year-end audit a thorough analysis of the gaps identified will be conducted by the Internal Auditor & Senior Management will develop an action plan that addresses the deficiencies with an overall goal of continual improvement.
- Senior Management at least annually or more often as required should review and validate company Document Control Master List with indication supporting documents needed to implement, monitor and maintain active OHS Program / Occupational Health and Safety Management System (OHSMS) effectively and assess conformance with business, corporate and legal requirements as well as compliance with applicable standards.
- Document Controller or Designee will coordinate and manage Document Control Register to ensure changes to, and current versions status of, documents are identified and tracked in order to prevent the unintended use of obsolete documents and identify such documents if they are retained for any purpose

**REFERENCES**

Occupational Health and Safety Act R.S.O. 1990

OHS Program / Occupational Health and Safety Management System (OHSMS)

Document Control Master List

Document Control Register

Occupational Health & Safety Risk Registry (OHS RR)

Construction Hazard Assessment (CHA)

Job Hazard Analysis / Assessment (JHA)

Addendum: Subcontractor Safety Package

Addendum: Index of Safe Work Practices (SWP)

Addendum: Index of Safe Job Procedures (SJP)

PPE Matrix

Specific EL 06 PPE inspection forms identified & controlled through Document Control Master List & Document Control Register

## PREVENTIVE MAINTENANCE POLICY STATEMENT

Govan Brown Associates Limited's senior management is vitally interested in the health, safety, and protection of our workers from workplace injury, occupational illness or loss and dedicated to work collaboratively with workers in the development, implementation, monitoring and continuous improvement of our Health and Safety Program.

Govan Brown Associates Limited recognizes that mechanical, process or control equipment failure can have adverse results in both human and economic terms.

In addition to down time and the costs involved to repair and/or replace equipment, tools, vehicles and facilities parts or components, there is the risk of injury to operators, and of acute exposures to chemical and/or physical agents.

Preventative maintenance is a vital part of our Health and Safety Program and is very important ongoing accident prevention activity where formalized preventive maintenance system aims to ensure that equipment, tools, vehicles and facilities are kept in safe working order and helps to:

- Protect assets and prolong the useful life of production equipment
- Improve system reliability
- Decrease cost of replacement
- Decreases system downtime
- Reduce injury

It is our policy to ensure that all equipment, tools, vehicles and facilities are well maintained in order to reduce the risk of accidents or injuries and general preventive maintenance requirements include but not limited:

- Only properly trained workers are to use tools, equipment and vehicles.
- Inspect all tools, equipment and vehicles before using.
- For vehicles, inspection will consist of doing a circle check at minimum.
- If applicable, maintenance schedules for all tools, equipment and vehicles are to be respected.
- Each jobsite supervisor is to conduct inspection of all tools, equipment and vehicles on the site.
- If at any time a worker judges that a tool, equipment or vehicle is unsafe for use, they are to properly tag the item and inform the supervisor immediately.
- Tools, equipment or vehicles that are tagged unsafe shall be either repaired or replaced.

Govan Brown Associates Limited will ensure that all individuals who perform maintenance work have the appropriate skills, accreditation and/or certification and this certification applies both to company employees and to contracted maintenance services.

Every worker must protect their own and coworkers' health and safety by learning about the hazards and its controls in the workplace, working in compliance with the law, safe work practices and procedures and programs established by this company.

Govan Brown Associates Limited, as an employer, is ultimately responsible for worker health and safety. As president, I give you my personal commitment that I will comply with my duties under the Occupational Health and Safety Act, such as taking every reasonable precaution for the protection of workers in the workplace.



March 22/24

Colin Gray

Date

President – Govan Brown Associates Limited



## PREVENTIVE MAINTENANCE PROGRAM & PROCEDURE

### PURPOSE

This section is integral to our health and safety program, emphasizing the significance of proper preventive & corrective maintenance. It provides guidelines for identifying and addressing overdue or defective equipment, tools, and vehicles as essential components of our safety initiatives. In addition to ensuring proper use by workers, it is imperative that tools and equipment undergo regular inspection, maintenance, and repair to uphold safety standards and operational efficiency.

### SCOPE

This document applies to all employees utilizing company vehicles, equipment, and tools to carry out their job tasks or work activities.

### DEFINITIONS

**Preventive Maintenance:** The systematic process of regular examination, care, and protection of tools, equipment, machines, and vehicles to maintain them in safe and usable condition, minimize downtime, and enhance productivity by preventing or early detecting problems.

**Corrective Maintenance:** The systematic process implemented when an asset has already broken down or malfunctioned, requiring immediate attention to restore it to operational condition. It involves diagnosing and fixing problems identified during routine inspections, preventive maintenance activities, or as reported by users.

**Adequate:** in relation to a procedure, material, device, object or thing, means

- sufficient for both its intended and its actual use, and
- sufficient to protect a worker from occupational illness or occupational injury, and "adequately" has a corresponding meaning;

**Qualified/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
- Has knowledge of all potential or actual danger to health or safety in the work

**OEM:** Original Equipment Manufacturer

## ROLES AND RESPONSIBILITIES

### MANAGEMENT

- Develop and maintain the vision, strategy, policies, and procedures of the preventive maintenance program;
- Communicate the established preventive maintenance program to all relevant parties and ensure employee awareness through orientation, onboarding and ongoing training;
- Procure, inspect, service, and maintain equipment as required based on manufacturer guidelines and/or legislated requirements;
- Maintain tools, equipment, vehicles, and facilities inventory and maintenance schedule database, providing resources for inspection, maintenance, and repair;
- Establish arrangements for formal and informal before use and regular preventive maintenance inspections according to manufacturer guidelines and/or legislated requirements;
- Maintain and retain documented records of inspections, service, and repairs including maintenance logs, work orders, and checklists;
- Develop and communicate procedures for handling overdue or defective tools, equipment, and vehicles, and for tagging and removing defected items from service ensuring corrective action is documented and implemented;
- Ensure operators and subcontractors comply with operating manuals and maintenance requirements including pre-use inspection and regular maintenance on equipment over 10-HP available on the project site and records of annual inspection of equipment over 10-HP retained as required;
- Ensure planned inspections and maintenance are conducted as required;
- Ensure competent & qualified workers perform inspection, service, and maintenance or repair work.

**SUPERVISOR OR DESIGNATE**

- Maintain equipment inventory and maintenance schedule database for tools, equipment, vehicles, and facilities and provide support and resources for the inspection, maintenance, and repair of equipment, tools, and vehicles;
- Ensure all workers are using or operating company tools (power), equipment, vehicles, and facilities and operate them in accordance with manufacturer instructions, legislated requirements, and company policies;
- Enforce and coordinate implemented arrangements to ensure that formal and informal preventive maintenance inspections of vehicles, tools, machines, and equipment performed before use, regularly and as required according to manufactures guidelines and/or legislated requirements;
- Ensure that all mechanically-powered vehicles, machines, tools and equipment over 10-HP inspected by a competent worker before first used and commencing work and thereafter at least once a year or more frequently as recommended by the manufacturer;
- Ensure operators and subcontractors follow and have required copies of any operating manuals, pre-use inspection and regular maintenance on equipment over 10-HP available on the project site and records of annual inspection of equipment over 10-HP retained as required;
- Maintain documented records database of inspections, service or repairs including maintenance logs, work orders, and checklists;
- Enforce established protocols to ensure that any vehicles, tools, or equipment that are overdue or defective are identified, tagged, and taken out of service; additionally, make sure that any corrective action done to maintain or repair the vehicle, tool, or equipment is recorded;
- Ensure that any tool, equipment, or vehicle that is tagged out as overdue and/or tagged out as defective is not used until corrective action or preventative maintenance is performed and make arrangements for repair or replacement of equipment as required;

**WORKERS**

- Know, understand and use established company preventive and corrective maintenance program and procedures, health and safety rules, practices and procedures for performing work in a safe manner;
- Obtain information and instruction on new or unfamiliar operation for equipment by Supervisor or designate.
- Work in compliance with legislated requirements, manufacturer instructions, and company policies when using or operating company tools, equipment, and vehicles;
- Perform formal and informal inspection using either equipment specific or general maintenance inspection checklists (as applicable) to ensure all equipment, tools, and vehicles inspected before use or daily, regularly and as required according to manufactures guidelines and/or legislated requirements;
- Report to supervisor or a member of management of any known damage, defects, concerns or hazards with the tool, equipment, or vehicle that they are using;
- Ensure tools, equipment, and vehicles maintained in adequate condition and no modification to, extension to, repair to or replacement of a part of a vehicle, machine, tool or equipment shall result in a reduction of the safety factor of the vehicle, machine, tool or equipment;
- Follow the implemented procedure to remove and tag overdue and/or defective tools, equipment and vehicle from service and report unsafe conditions for further corrective action;
- Operate a vehicle or powered machine, tool or equipment only if competent to do so and carry out repairs, alterations and process change only when authorized to do so;

**CONTRACTOR/SUBCONTRACTOR**

- Maintain required copies of any operating manuals and records of pre-use inspection and regular maintenance on equipment over 10-HP on the project site and ensure records of annual inspection of equipment over 10-HP retained as required;
- Work in compliance with legislated requirements, manufacturer instructions, and company policies when using or operating company tools, equipment, and vehicles;
- Ensure protocol for removal and tagging of damaged or defective tools and equipment is followed and preventive and corrective maintenance is performed as required with retention records of conducted maintenance/service/ repair;
- Ensure that the person(s) operating tools, equipment, and vehicles performing the maintenance are competent;

## PROCEDURE

The preventive maintenance schedule database and inventory of owned and/or rented tools, equipment, vehicles, and facilities will be created, tracked, and maintained internally by the Govan Brown management.

Within the internal database of owned and/or rented equipment inventory and preventive maintenance schedules, Govan Brown management will identify items and assets to be maintained based on formal PM costs outweigh assessment, which may involve but not limited formal cost-benefit analyses, criticality and feasibility evaluation, or return-on-investment (ROI) calculations.

Govan Brown management reserves the right to introduce and implement various internal arrangements, such as an intranet or cloud-based filing system, internal spreadsheets for documentation, desktop or mobile online modular platforms, specialized asset management software, or fully computerized maintenance management systems, in order to implement and maintain a database of owned and/or rented equipment inventory and preventive maintenance schedules.

In order to ensure compliance with the requirements of time-based and/or usage-based preventative maintenance schedules, Govan Brown management will provide the necessary support and resources for preventive inspection and maintenance. This support will include the performance of corrective maintenance, on-demand troubleshooting/service, and repair of equipment, tools, and vehicles as necessary when failure occurs.

For all owned and/or rented equipment, Govan Brown management will make sure that time-based and/or usage-based preventive maintenance schedules, including those mandated by manufacturer's standards and/or regulatory requirements, are implemented and documented. This could involve, among other things, routine preventive maintenance and inspections of the equipment before it is used for the first time, as well as starting work every day or every time before it is used, within the manufacturer's recommended preventative maintenance intervals and any legal requirements, once a year or more frequently if necessary, depending on runtime or the calendar time frame. Subcontractor management or any other equipment renter shall guarantee that any borrowed, leased, or rented equipment is maintained in accordance with preventive maintenance agreements that at the very least fulfill the original equipment manufacturer preventative maintenance standards and comply with legal requirements.

Equipment must be operated by competent qualified personnel in compliance with all manufacturer operating manuals and legal requirements.

At a project or point of use, copies of any operating instructions provided by the manufacturers for any equipment rated 10 horsepower or more must be kept easily accessible.

Inspections and preventive/corrective maintenance can only be carried out by people who are qualified due to their knowledge, training, and experience as well as those who are deemed competent by applicable regulations, standards, guidelines, and/or manufacturer's instructions.

Before being used on a project, all mechanically powered equipment rated for more than 10 horsepower must undergo a written inspection by a qualified worker. After that, the equipment must be inspected annually (or more frequently if specified by the manufacturer) to detect any defects or hazardous conditions and to verify if it can handle its rated capacity. A copy of the documented inspection records must also be kept within the equipment and/or kept accessible at the project site or head office.

Any equipment discovered to be non-operational as a result of an unexpected or intermittent failure, an unsafe condition, or abnormality to be identified, recorded, tagged out and removed from service for further and/or additional corrective maintenance.

All records of preventive maintenance or corrective maintenance action performed on tools, equipment, and vehicles will be tracked through the equipment inventory and maintenance schedule database and kept available at project sites/head offices. Every replacement part for equipment shall have at least the same safety factor as the part it is replacing.

## INSPECTION

Govan Brown implemented preventive maintenance program and inspection arrangements to ensure that vehicles, machinery, tools and equipment functioning according to manufactures guidelines and/or legislated requirements and maintained in a condition that does not endanger a worker.

Govan Brown as part of preventive maintenance program implemented arrangements for vehicles, machinery, tools and equipment inspections in accordance with company policies, manufacturer instructions and legislated requirements.

The following inspection criteria are included in the equipment inventory and maintenance schedule database, but are not exhaustive:

- Complete overhaul equipment inspection of tools, equipment, and vehicles will be performed before first used & commencing work as per O. Reg. 213/91, s. 93;
- All tools, equipment, and vehicles will be visually inspected daily prior to use / every time prior to use by the user to verify that they are in proper working condition and are free from any defects or damage;

- Standard warm-up, routine care / cleaning tasks & functional test will be performed daily prior to use / every time prior to use by the user to verify that they are in proper working condition and are free from any defects or damage;
- During regular operations, equipment performance monitoring and routine preventive maintenance services will be carried out in accordance with the guidelines and recommendations of the original equipment manufacturer (OEM);
- Planned preventive maintenance based on usage/mileage or time base intervals, regardless of equipment condition, will be carried out as per original equipment manufacturer (OEM) guidelines and recommendations;
- Planned complete overhaul equipment preventive maintenance inspection will be completed at least annually or more frequently as recommended by OEM;
- Legislated pre-use and routine inspections still apply to any equipment that is borrowed, leased, or rented; at the very least, periodic sampling of the maintenance record is required;
- All equipment operators are to complete a documented pre-use inspection, prior to using their equipment;
- All equipment greater than 10-HP will require to use an operator equipment maintenance inspection checklist/vehicle inspection checklist or similar / equivalent checklist and document records that identifies at least the following:
  - Information about the operator, equipment, and date of inspection
  - Area(s) Examined - Defects Found During Inspection
- Any equipment discovered to be non-operational as a result of an unexpected or intermittent failure, an unsafe condition, or abnormality to be identified, recorded, tagged out and removed from service for further and/or additional corrective maintenance.
- All overdue and/or broken tools, machinery, and vehicles will be red-tagged out of service and taken out of service for repair or disposal. Any person attaching the red tag with indication of specific concern/ safety issue or defect should notify their supervisor immediately.
- In the event that a tool, piece of equipment, or vehicle is damaged or defective the worker is to notify the supervisor and the supervisor will ensure the piece of equipment, tool or vehicle is removed from service and tagged out.
- Any defective personal protective equipment needs to be reported to the supervisor right away and taken out of service. Request replacement PPE from your supervisor, and make sure it is in good shape and functions as intended.

**MAINTENANCE**

As part of its corporate preventive maintenance program, Govan Brown has implemented 2 (two) main types of maintenance:

**1. Preventive Maintenance**

Preventive maintenance is a cornerstone of Govan Brown's preventive maintenance program. It emphasizes regularly planned or scheduled maintenance tasks aimed at actively minimizing the chance of failure, costly repairs, and unscheduled downtime.

The goal of preventive maintenance is to provide assets with regular examination, care, and protection while they are still in working condition.

Preventive maintenance tasks include but not limited:

- Conducting regular inspections and assessments.
- Performing routine maintenance activities as per predetermined schedules.
- Addressing minor issues before they escalate into major problems.
- Following manufacturer-recommended maintenance procedures to extend asset lifespan and optimize performance.
- Proactively replacing worn-out parts or components to prevent unexpected failures.

**2. Corrective Maintenance**

Corrective maintenance is implemented when an asset has already broken down or malfunctioned, requiring immediate attention to restore it to operational condition.

This type of maintenance involves diagnosing and fixing problems identified during routine inspections, preventive maintenance activities, or as reported by users.

Key components of corrective maintenance include but not limited:

- On-demand troubleshooting, service, and repair when failures occur during regular planned preventive maintenance intervals.

- Addressing sudden or intermittent failures, unsafe conditions, or abnormalities identified during planned and or routine preventive maintenance inspections with Run To Failure / Breakdown outcome.
- Conducting emergency maintenance in response to unexpected breakdowns or failures that jeopardize operations or safety.
- Issuing service work orders or invoices for corrective maintenance tasks to track repair activities and associated costs accurately.

Through the implementation of a preventive maintenance program, Govan Brown will make sure that:

- Vehicles, machines tools or equipment should not be used when it is defective or hazardous and when the weather or other conditions are such that its use is likely to endanger a worker (O. Reg. 213/91, s. 93);
- Vehicles, machines tools or equipment should not be used while it is being repaired or serviced, unless the repair or servicing requires that it be operated (O. Reg. 213/91, s. 93);
- All vehicles, machines, tools and equipment shall be used in accordance with any operating manuals issued by the manufacturers and shall be maintained according to company policies, manufacturer instructions, and legislated requirements (O. Reg. 213/91, s. 93);
- All mechanically-powered vehicles, machines, tools and equipment rated at greater than 10-HP shall be inspected by a competent worker to determine whether they can handle their rated capacity and to identify any defects or hazardous conditions. These 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. (O. Reg. 213/91, s. 94);
- Every replacement part for a vehicle, machine, tool or equipment shall have at least the same safety factor as the part it is replacing and no modification to, extension to, repair to or replacement of a part of a vehicle, machine, tool or equipment shall result in a reduction of the safety factor of the vehicle, machine, tool or equipment. (O. Reg. 213/91, s. 95);
- All records of preventive maintenance or corrective maintenance action performed on tools, equipment, and vehicles will be tracked through the equipment inventory and maintenance schedule database and kept available at project sites/head offices;
- Inspections and preventive/corrective maintenance can only be carried out by people who are qualified due to their knowledge, training, and experience as well as those who are deemed competent by applicable regulations, standards, guidelines, and/or manufacturer's maintenance requirements and instructions;

<b>TYPE OF EQUIPMENT</b>	<b>TYPE OF INSPECTION</b>	<b>SCHEDULE</b>
Tools	Visual inspection prior to use	Small hand tools to be discarded if not repairable
Grinders	Visual inspection prior to use	Manufacturer's Recommendation
Power Tools	Complete Inspection and Certification	Before first use or repeated use
	Critical items, controls, overall functioning	Prior to use
	Complete inspection	Every 6 months
	Repair	When failure occurs
	Preventative Maintenance	Manufacturer's recommendation
Negative Air Units	Body/electrical inspection	Before first time use or repeated use; DOP test as needed
	HEPA	Replace on DOP failure
Extension Cords	Visual inspection	Prior to use, tag out/repair as needed; discard if unrepairable
HEPA Vacuum	Visual	Before first time use or repeated use; DOP test as required
	HEPA filter	Replace on failure of DOP (Dispersed Oil Particulate)
HVAC	Once per year (by building)	Insurance schedule
Fall Protection	Visual, hands on	Before every use; once yearly by outside source

**QUALIFICATION REQUIREMENTS**

Inspections and preventive/corrective maintenance can only be carried out by people who are qualified due to their knowledge, training, and experience as well as those who are deemed competent by applicable regulations, standards, guidelines, and/or manufacturer's maintenance requirements and instructions. The following competency and technical proficiency criteria apply but not limited:

**Workers**

- Demonstrated proficiency in equipment operation, adherence to safety protocols, and execution of maintenance procedures through relevant training and hands-on experience
- Capable of diagnosing issues, conducting repairs, and performing preventive maintenance tasks effectively.
- Possession of relevant certifications or accreditations validating proficiency in equipment operation and maintenance.
- Commitment to ongoing training to remain abreast of technological advancements and industry best practices.

**Internal Service Department**

- Maintenance of a multidisciplinary team with expertise in mechanical, electrical, or automotive fields tailored to the organization's equipment portfolio.
- Attainment of certifications specific to respective areas of expertise from accredited programs.
- Demonstrate practical experience in maintaining and repairing organizational equipment.
- Implementation of robust quality assurance measures to ensure compliance with standards and regulatory requirements through particular inspection and documentation.

**External Certified Party**

- Possession of industry-recognized certifications pertinent to the serviced equipment and machinery.
- Completion of training programs focusing on equipment-specific maintenance procedures.
- Maintenance of comprehensive quality assurance records and a proven track record of successful maintenance projects and satisfied clients within the relevant industry.
- Adherence to all pertinent safety and environmental regulations
- Maintenance of adequate liability insurance to mitigate risks associated with maintenance activities.

**REMOVING OVERDUE OR DEFECTIVE EQUIPMENT, TOOLS, AND VEHICLES**

- All overdue and/or defective tools, equipment, and vehicles will be red tagged out and removed from service to be repaired or discarded.
- Any person attaching a red tag for safety reasons must stop operating the equipment and notify their supervisor immediately after attaching the red tag and clearly print on the tag any defects found.
- The red tag will be placed at visible spot on the item to be returned with indication of specific concern/ safety issue or defect.
- Any item returned with red tag for inspection must indicate the job number. Any person attaching the red tag with indication of specific concern/ safety issue or defect should notify their supervisor immediately.
- Items with attached red tags returned for the inspection will be quarantined until thorough inspection conducted by competent person and adequate corrective actions implemented.
- In the event that a tool, piece of equipment, or vehicle is damaged or defective the worker is to notify the supervisor and the supervisor will ensure the piece of equipment, tool or vehicle is removed from service and tagged out. The supervisor will then outsource and notify a competent certified 3<sup>rd</sup> party service provider / mechanic of the situation, whether internal or external.
- Certified 3<sup>rd</sup> party service provider / mechanic will then decide and advise if the tool, equipment, or vehicle will need to be repaired or replaced, and/or removed from site.
- If a piece of equipment requires immediate attention, certified 3<sup>rd</sup> party service provider / mechanic may visit site to complete the repair.
- Where a repair cannot be made on site, the certified 3<sup>rd</sup> party service provider / mechanic will have the piece of equipment towed back to the maintenance facility to be repaired there, or where repairs cannot be made on the maintenance facility then it may be outsourced for further corrective actions.
- Records on the corrective actions and inspections performed by competent person will be provided upon completion of the repair/service work/replacement work as required.
- All personal protective equipment which is found to be defective must be immediately reported to the supervisor and removed from use. Ask your supervisor for replacement PPE and ensure PPE is in adequate condition and working as intended.

## COMMUNICATION

- Govan Brown Preventive Maintenance Policy, Program and Procedures located in the Govan Brown health and safety binder and be posted in the workplace H&S safety Boards.
- Govan Brown's Preventive Maintenance Policy, Program and Procedures will be communicated to all new Govan Brown workers, supervisors, and managers through new employee general orientation or site-specific induction and/ or through periodic management and staff safety meetings or toolbox talk meetings.
- All existing Govan Brown staff will receive orientation through the OHS Program / Occupational Health and Safety Management System (OHSMS) orientation and /or through Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) communication and periodic management and staff safety meetings as well as through periodic and ongoing safety training, internal communication protocols or structured training sessions.
- This procedure will be made available at the point of use to workers, subcontractors and suppliers upon request.

## TRAINING

- All new managers, supervisors, and workers will receive training Govan Brown Preventive Maintenance Policy, Program and Procedures during their on-boarding training upon hire.
- All new employees will receive awareness training as part of their orientation on their specific health and safety roles and responsibilities through the new hire orientation process.
- All existing employees will receive training on their health and safety roles and responsibilities through periodic staff OHS Program / Occupational Health and Safety Management System (OHSMS) orientation safety meetings as well as through periodic and ongoing safety training or structured training sessions.
- Verification of training will be confirmed via sign off and may include knowledge verification testing.

## EVALUATION

- This procedure will be reviewed on annual basis by Senior Management and /or during the annual OHS Program / Occupational Health and Safety Management System (OHSMS) internal audit and maybe changed due to business needs, any legal requirements and based on the results of the evaluation to ensure it continues to meet OHS regulation and standards and to ensure it is relevant with current operations and any changes will be indicated in the meetings minutes or reflected on the revision page.
- The Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) and management will also be involved with the evaluation by analyzing forwarded items of concern and suggesting corrective action.
- On a yearly basis, management will review OHS Program / Occupational Health and Safety Management System (OHSMS) to assess whether it is still compliant with current regulations and with the current work environment. If necessary and if required procedure will be amended to reflect the current operation.
- After the year-end audit a thorough analysis of the gaps identified will be conducted by the Internal Auditor & Senior Management will develop an action plan that addresses the deficiencies with an overall goal of continual improvement.
- Senior Management at least annually or more often as required should review and validate company Document Control Master List with indication supporting documents needed to implement, monitor and maintain active OHS Program / Occupational Health and Safety Management System (OHSMS) effectively and assess conformance with business, corporate and legal requirements as well as compliance with applicable standards.
- Document Controller or Designee will coordinate and manage Document Control Register to ensure changes to, and current versions status of, documents are identified and tracked in order to prevent the unintended use of obsolete documents and identify such documents if they are retained for any purpose

## REFERENCE

Occupational Health and Safety Act R.S.O. 1990 and Construction Projects (Ontario Regulation 213/91)

OHS Program / Occupational Health and Safety Management System (OHSMS)

Document Control Master List and Document Control Register

Job Hazard Analysis / Assessment (JHA)

Addendum: Subcontractor Safety Package

Addendum: Index of Safe Work Practices (SWP) and Addendum: Index of Safe Job Procedures (SJP)

Specific EL 07 PM inspection forms identified & controlled through Document Control Master List & Document Control Register

Operator Equipment Maintenance Inspection Checklist

Equipment Pre-Use Inspection

### Others:

Equipment Manufacturer Manuals

## TRAINING POLICY STATEMENT

Govan Brown Associates Limited Senior Management recognizes the right of workers to work in a safe and healthy work environment and is committed to support arrangements to foster a safe and healthy work environment through the occupational health and safety education and training with workers.

Govan Brown Associates Limited as employer committed to provide information, training, instructions and supervision to management, supervisors, and workers which will cultivate appreciation of their personal responsibilities for health and safety within the framework of the minimum standards outlined by legislation and develop their awareness, competency and understanding of the specific hazards and risks associated with their jobs and working environment as well as inform them of the control measures that are in place and any related safe procedures that must be followed.

Govan Brown Associates Limited encourage all levels of organization to be involved in health and safety training processes and apart from satisfying legal obligations as well as meeting the corporate requirements and operational needs, Govan Brown Associates Limited's training policy and procedural framework is also aiming to:

- Provide information, training and instruction to workers to know and protect their health or safety;
- Promote positive attitudes and improve safety culture;
- Reduce accident severity and frequency as well as injury and ill-health related absence;
- Reduce compensation claims and, possibly, insurance premiums;
- Improve staff morale and retention as well as corporate reputation;

Govan Brown Associates Limited will maintain and monitor a comprehensive workplace training and orientation process to familiarize new employees with company functions, Health and Safety Policy and Program and the value of occupational health and safety in their work to determine what further training and information the employee needs to have to do the job safely.

Govan Brown Associates Limited will ensure the provision of necessary resources and support arrangements for job specific training/on-the-job training focusing on the development competency, skills, and proficiency by personnel in essential and specific Health & Safety requirements including safe job procedures prior to the commencing work and performing duties for both field operations and administration.

Govan Brown Associates Limited also will ensure that management and supervisors receive additional training on specific health and safety program and requirements for H&S roles and responsibilities, workplace inspections, emergency response and planning as well as accident/incident investigation.

Govan Brown Associates Limited will maintain effective systems in place to ensure employees have received the proper training regarding important health and safety information through utilization of various methods including but not limited:

- Worker induction/Site orientation
- Training Sessions (structured/specific)
- Safety/Toolbox Talks

Govan Brown Associates Limited as an employer, is ultimately responsible for worker health and safety and will ensure that workers and supervisors complete a basic occupational health and safety awareness training program. As president, I give you my personal commitment that I will comply with my duties under the Occupational Health and Safety Act, such as taking every reasonable precaution for the protection of workers in the workplace.



Colin Gray

President – Govan Brown Associates Limited

March 22/24

Date



## **TRAINING PROGRAM & PROCEDURE**

### **PURPOSE**

Govan Brown as Employer recognizes the primary importance of safe and healthy working environment and its obligation to take all necessary measures to ensure the worker has been given adequate information as to the risks connected with his/her work and provide the worker with the appropriate training and assistance to ensure that he/she possesses the skill and knowledge to work safe.

Govan Brown has developed Training Program to ensure the provision of guidelines and procedures for work parties regarding personal responsibility for health and safety training, communication and orientation requirements.

Govan Brown aims to ensure all new employees, including transferred supervisors or promoted workers are given company orientation, job specific and other necessary training prior to beginning work, including framework of the minimum standards outlined by legislation, knowledge of the applicable regulations and safe work practices necessary to work safely.

As a part of its due diligence and duty of care Govan Brown is committed to providing the necessary information, instruction, training and supervision for workers to make safe work decisions and adequate supervision to ensure that they are working in a safe manner.

### **SCOPE**

The Training Policy, program and health & safety orientation applies to all Govan Brown supervisors, managers and workers and sub-contractors.

## **ROLES AND RESPONSIBILITIES**

### **MANAGEMENT**

- Establish training program to manage health and safety training needs and objectives and ensure orientation program is developed and provided.
- Assign and support personnel to administer and manage the training program and ensure competent person delivers the mandatory orientation prior to start work and provides mandatory orientation to young workers, returning workers or workers who change job roles within the organization.
- Provide workers and worker representatives with time and resources to participate effectively in the training program.
- Ensure that workers and worker representatives are informed, consulted on, and given the opportunity to participate in aspects of the training program associated with their work or the workplace they represent.
- Include provincial/territorial, and/or local legal health and safety training requirements in the training and orientation program.
- Ensure continuous education and retraining for workers to safely carry out their job duties and fulfill their personal responsibilities for health and safety.
- Organize, arrange and provide comprehensive health and safety training at all organizational levels, based on training needs analysis and legal requirements.
- Facilitate, organize, and deliver health and safety training based on project site requirements as determined through risk assessments, job analyses, incident reports, audit findings, inspections, and site-specific information.
- Ensure provision of minimum mandatory and legislated training requirements before starting the work or prior to performing the relevant task at company project site.
- Ensure supervisors are provided with comprehensive training, information, instruction, and guidance, and hold them responsible for both their own actions and the actions of their subordinates.
- Assess and allocate financial resources and funds to support all elements of the training program and training needs.
- Conduct evaluation of training and orientation program at least annually to identify any deficiencies and ensure adherence to relevant regulations, making necessary adjustments to policies and procedures to achieve compliance and rectify any gaps identified.
- Manage and update a company training and orientation database, maintaining documentation and records of training events readily available for each employee and measure the achievement of training objectives.

**SUPERVISOR**

- Ensure the implementation of the Govan Brown training and orientation program for workers new to the workplace or new hires.
- Conduct or oversee the orientation process, introducing workers to company policies, procedures, safety guidelines, and workplace rules.
- Familiarize workers with the company's mission, vision, values, and organizational structure.
- Explain job roles, responsibilities, and performance expectations and address questions or concerns raised during the training or orientation process.
- Communicate hazards and risks associated with job and workplace and ensure workers fully aware of implemented controls for associated risks and know how to protect themselves from potentially hazardous situations.
- Collaborate in assessing training needs and identifying skills gaps and training requirements.
- Prioritize training initiatives based on company goals and conduct job specific / on-the-job training, providing guidance and coaching.
- Facilitate training sessions, workshops, safety toolbox talks or regular health and safety meetings as assigned.
- Educate and train workers on company safe work practices and safe job procedures as required.
- Observe, monitor and evaluate worker performance subsequent to their training and orientation, providing constructive feedback and assistance.
- Conduct regular check-ins to assess progress and address challenges related to training and orientation.
- Recognize and reinforce positive changes in performance resulting from training.
- Maintain accurate training and orientation documentation and records, including attendance and completion of training modules.
- Ensure completion of mandatory and regulatory training before work or relevant tasks as required.
- Continuously assess the effectiveness of the training program and suggest improvements.
- Provide feedback and suggestions for enhancing training content, methods, or delivery.

**WORKERS**

- Attend the company's orientation program and actively participate to gain an understanding of health and safety policies, procedures, and rights and responsibilities under the Occupational Health and Safety Act (OHSA).
- Adhere to the requirements and guidelines outlined in the OHSA and the company's health and safety policies, procedures and protocols.
- Participate in required training programs related to occupational health and safety as directed by the company.
- Follow instructions provided during training, including safe work practices, hazard identification and assessment and emergency procedures.
- Adhere to established safety procedures, including the use of personal protective equipment (PPE), machinery safeguards, and safe work practices.
- Report hazards, incidents, near misses, and unsafe conditions to supervisors.
- Comply with OHSA regulations and company health and safety policies.
- Contribute to hazard identification, risk assessment, and the development of control measures.
- Follow established procedures, guidelines, and safety controls provided for specific tasks or work processes. Properly use and maintain personal protective equipment (PPE) provided by the company for designated tasks.
- Follow instructions for selecting, inspecting, wearing, cleaning, and storing PPE.
- Engage in ongoing education and training opportunities for continuous improvement.
- Report health and safety concerns to supervisors or the designated authority.
- Cooperate with investigations or inspections conducted by safety personnel.

**CONTRACTOR/SUBCONTRACTOR**

- Attend the company's contractor/subcontractor orientation program and actively participate to gain an understanding of health and safety policies, procedures, and requirements.
- Familiarize themselves with the Occupational Health and Safety Act (OHSA) and applicable regulations relevant to their work.
- Comply with all applicable health and safety legislation, regulations, and company policies.
- Provide proof of valid certifications, licenses, and qualifications required for their specific trade or work activities.

- Follow all established safety procedures and safe work practices while on company premises.
- Conduct a thorough hazard assessment of their work areas and implement appropriate control measures.
- Communicate any identified hazards or unsafe conditions to the appropriate personnel.
- Coordinate with Govan Brown to ensure proper integration of health and safety measures between contractors/subcontractors and the company's operations.
- Participate in any required training programs or sessions specific to the contractor/subcontractor's scope of work or hazards involved.
- Provide training to their employees or workers on health and safety requirements and safe work practices.
- Maintain records of training, qualifications, and certifications of their employees as required by law and company policies.
- Report all incidents, injuries, near misses, and hazardous situations to Govan Brown in a timely manner.
- Cooperate with investigations or inspections conducted by regulatory authorities or Govan Brown management or supervision.
- Follow any additional specific health and safety guidelines or procedures provided by Govan Brown for their work activities.
- Continuously monitor and assess the effectiveness of their health and safety programs and make improvements as necessary.
- Comply with all directions provided by Govan Brown regarding health and safety requirements and site-specific rules.

#### **EXTERNAL TRAINING PROVIDER**

- Collaborate with Govan Brown to understand training needs and requirements.
- Design and develop training materials that align with health and safety policies and OSHA regulations.
- Deliver training sessions on schedule and meet legal requirements.
- Deliver training by a competent person who have a suitable level of knowledge, skills, abilities in the subjects they deliver with experience in health and safety and OSHA.
- Ensure training meets or exceeds regulatory requirements.
- Use effective instructional methods and interactive activities during training with competency in delivery techniques and methods appropriate to adult learning.
- Explain relevant legislation and regulations with incorporated industry-specific examples and case studies.
- Address participant questions and concerns and administer assessments to measure knowledge.
- Maintain accurate records of training sessions and confidentiality of sensitive information.
- Administer knowledge verification tests to verify worker comprehension.
- Issue certificates and record attendance for workers who successfully complete training
- Provide feedback for improvement and update training materials as needed.
- Continuously improve training delivery and content.

#### **KEY COMPONENTS PROMOTING HEALTH & SAFETY CULTURE**

The safety culture of an organization is the product of individual and group values, attitudes, perceptions, competencies and patterns of behaviour that determine the commitment to, and the style and proficiency of, an organization's health and safety management.

Organizations with a positive safety culture are characterized by communications founded on mutual trust, by shared perceptions of the importance of health & safety and by confidence in the efficacy of preventive measures.

Govan Brown recognizes that provision of information and training for employees will develop their awareness and understanding of the specific hazards and risks associated with their jobs and working environment. It will inform them of the control measures that are in place and any related safe procedures that must be followed.

Apart from satisfying legal obligations, Govan Brown Health & Safety system and training program also places emphasis on provision of sound information and training to employees with proven benefits in:

- a reduction in accident severity and frequency and in injury and ill-health related absence;
- a reduction in compensation claims and, possibly, insurance premiums;
- an improvement in the health and safety culture of the organization;
- improved staff morale and retention;

## **MANAGEMENT COMMITMENT AND LEADERSHIP**

Govan Brown recognizes that without management commitment it is unrealistic to assume that workers will by themselves adopt the necessary systems and procedures to ensure safety throughout all aspects of the organisation.

Management must provide the leadership necessary to inspire and motivate work parties at all levels to pursue health and safety objectives as rigorously as other production or operations orientated objectives. This may be done by establishing clear priorities and targets which arise from the organisation's safety policy and ensuring that they are met throughout the organisation.

Govan Brown management commitment is demonstrated by:

- Being seen and involved with the work, taking an interest and correcting deficiencies:
  - Having an open-door policy regarding health and safety issues to encourage workers to raise issues of concern.
  - Encouraging ownership and personal responsibility/participation in health and safety.
- Promoting changes to improve health and safety:
  - Reviewing the status of health and safety committees and health and safety practitioners, and encouraging a high visibility for them within the company.
  - Producing regular reports of health and safety performance and acting on them.
- Providing sufficient resources to carry out jobs safely:
  - Ensuring that there are enough people, time and money to carry out the job safely.
  - Providing appropriate personal protective equipment.
- Ensuring that all personnel are competent to carry out their work by providing appropriate training, as and when necessary, in all aspects of the job, including safety.
- Enforcing the company safety rules and demonstrating their own observance of them, matching their actions to their words by ensuring that defects are corrected as soon as is reasonably practicable and not allowing double standards to operate.

## **TRAINING**

Training has been defined as a planned process to modify attitude, knowledge or skill behaviour through learning experience to achieve effective performance in an activity or range of activities. It is concerned mainly with short term performance of the job or task in hand. It provides the preparation to undertake specific requirements by, usually, the development of particular skills. It may also be linked to development plans, for either the individual and/or the organisation, in which case it may be applied to assist with career growth and the building of skills which may or may not be immediately required, but will be in the future.

Training is perhaps one of the key weapons in health and safety management as it can be targeted at developing the necessary understanding and skills in individuals and groups. Its success depends on identifying training needs and the changes in behaviour required, and setting outcomes which can be demonstrated after the training has been given.

The benefits which flow include:

- New workers, both new recruits to the organisation and those changing jobs within it, are able to accept the requirements of the job, including safety aspects, and become effective quickly.
- The correct and safe method of carrying out a task is learnt from the beginning and, as there is less risk of passing on bad and unsafe practices, machinery and equipment are used more effectively. This means there is less likelihood of accidents occurring in the early stages of a worker starting a new job.
- Well trained workers who understand the processes in which they are involved and are skilled in operating them are more productive and work to higher standards. They also tend to stay longer with the employer, ensuring future reliability and continuity.

## **COMPETENCY**

The ability of individual to do something successfully or efficiently based on:

- 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

Competent people, who know what they are doing and have the necessary skills to do the task correctly and safely, will make the organization performance effective and efficient. Competence can be bought in through recruitment or consultancy but it is often much more effective to develop it among employees. It demonstrates commitment to health and safety and a sense of security for the workforce. The loyalty that it creates in the workforce can be a significant benefit to health & safety standards. Competent workers must have sufficient training, experience, knowledge and other qualities to enable them to properly undertake the duties assigned to them.

Competency profiles are more effective than traditional job descriptions for building a strong safety culture and have multiple advantages for both organizations and individuals ensuring workers are adequately demonstrating the skills required to safely complete their work.

Competent workers tend to increase profitability and productivity for the organization and through competency profiles employees are able to clearly see what skills are required for their work and what level of proficiency they are demonstrating in the skills. It becomes clear and often motivating for employees to recognize specifically what skills are required and what is needed for skill enhancement.

Employees can also gain a clear understanding of what competencies would be required to allow them to advance within a company or within the industry.

### **COMPETENCY FRAMEWORK & COMPONENTS**

In order to build and support strong health and safety culture as a supplement to general job descriptions Govan Brown developed the standardized competency framework in line with Health & Safety policy within the scope of the OHS Program / Occupational Health and Safety Management System (OHSMS).

The Govan Brown, considering its varied work nature, has opted for four core values, four core competencies and eleven functional competencies following a thorough analysis of organization, operational and administrative fields. This standardized approach ensures more efficient human resources management by identifying shared competencies across positions.

Govan Brown documented and approved competency framework as detailed Internal Reference Documentation (IRD) that include company **Core values**, **Core competencies** and **Functional competencies**.

**Core values** are principles that influence people's actions and the choices they make. They are ethical standards that are based on the standards of conduct are to be upheld by all staff. Govan Brown **core values** are: *Integrity, Professionalism and Respect for diversity*.

**Core competencies** provide the foundation of the framework, describing behaviors to be displayed by all staff members. They are defined by occupational roles for a given job, setting out the company's expectations, and the respective behavioral indicators, outlining specific traits that every staff member is expected to demonstrate during her/his employment with the company, and include: *Communication, Teamwork, Planning and Organizing and Achieving Results*.

**Functional competencies** are defined by duties and responsibilities assumed by staff members for a given job. Based on the job complexity and level of responsibility, and the seniority of the occupational role, an average of three to five functional competencies are assigned to a given job. Govan Brown functional competencies include but not limited: *Leading and Supervising, Analytical Thinking, Knowledge Sharing and Learning, Judgement/Decision Making, Technical/Scientific Credibility, Change Management, Commitment to Continuous Process Improvement, Partnership Building, Client Orientation, Persuasion and Influencing, Resilience*.

The competency framework consists of three main occupational roles for the core competencies and four occupational roles for the functional competencies. These roles refer to the primary purpose of and the relationship between jobs. For the core competencies and functional competencies, the occupational roles are broadly defined as follows:

- **Individual Contributor** — a staff member, normally without supervisory responsibility, who is accountable for his/her individual performance and contribution to the outputs of the team. Individual contributor role is split into following major groups:
  - *Associate*: staff member who provides support to colleagues and works under the technical guidance of the supervisor
  - *Specialist*: staff member or professional specialist who has expert knowledge in his/her field of specialization and works independently. A Specialist does not normally have direct supervisory responsibility for staff members; however, he/she may assume project management /supervision responsibilities, including the coordination of human, OHS and/or financial resources.
- **Management / Supervision** — a staff member at the middle or senior professional level with managerial / supervision responsibility for human, OHS and/or financial resources who oversees the delivery of programmatic results.
- **Senior Management** — a staff member at the executive, level who is responsible for creating an enabling environment and takes decisions impacting the entire OHS program/functional area.

## **SUPERVISION**

Govan Brown will ensure that competent person assigned as supervisor to direct and monitor employees in the performance of their duties.

In addition to regulatory prescribed roles and accountabilities assigned competent supervisor will have a combination of the following:

- be qualified because of knowledge, training, and experience to do the assigned work
- have knowledge about the hazards and risks associated with the job or task to be performed
- know how to recognize, evaluate and control these hazards and risks
- have the ability to work so that their health and safety and the health and safety of others is not in danger
- have knowledge of the laws and regulations that apply to the work being done

## **EMPLOYEE REPRESENTATION**

Given the resources and freedom to fulfil their function effectively, enthusiastic, competent employee safety representatives can make a major contribution to good health and safety standards. They can provide the essential bridge between managers and employees. It is important for workers to understand the importance behind training and education, and to ensure they are participating in the training programs, as required.

## **PROCEDURE**

Govan Brown Senior Management recognizes the right of workers to work in a safe and healthy work environment and committed to support arrangements to foster safe and healthy work environment through health and safety education and communication with workers.

Govan Brown will ensure provision of minimum mandatory and legislated training requirements before starting the work or prior to performing the relevant task.

Govan Brown will ensure completion of mandatory and regulatory training before work or relevant tasks as required and update training and orientation database, maintaining documentation and records of training events readily available for each employee.

Govan Brown provides comprehensive education and training to their workers to pass on relevant skills and organization maintains the company training and orientation database.

Govan Brown supervision of workers ensures that staff can put into practice the skills and knowledge they have learned. Training must focus on transferring the skills, knowledge and abilities to workers so that they can make appropriate, informed and safe decisions in the performance of their job.

Training is an ongoing component of the health & safety program. As there are regular changes in business processes and operations, there is a similar requirement for training programs to be changed in response to new information and new situations. In addition, to help keep health & safety awareness a priority and included as a part of the workplace culture, it is important to have an ongoing improvement training program that continuously educates the workforce on matters of health and safety.

Training and orientation induction are mandatory for all new employees and those newly assigned to unfamiliar tasks prior starting work. Besides importance of conformity and potential consequences for deviations or noncompliance workers' participation within the Occupational Health & Safety program is vitally important as without proper training, employees may unknowingly create risks for themselves or for others through their actions. New workers may also not have the experience to identify work situations that are hazardous and may continue to put themselves at risk.

Employees new to the company, young workers or new to a specific job must receive a mandatory orientation regarding safe practices and procedures relative to the job they will be performing prior to starting work.

Additional training may well be needed following a single or series of accidents or near misses, the introduction of new legislation, the issuing of an enforcement notice or as a result of a risk assessment or safety audit

There is a distinct difference between certification and competency. Certification shows a level of education or training received. Competency is defined as having the ability, skill, proficiency, and expertise to perform the task(s) required in a safe, reliable, reproducible manner. Receiving training does not always indicate competency, which must be evaluated separately. These differences must be recognized by the company.

Effective training has several components:

- New Employee Orientation – general and site specific
- On-the-Job Training
- Ongoing Training
- Communication methods (i.e., Safety meetings, Safety Talks)
- Structured Training sessions

## **TRAINING PROGRAM NEEDS ASSESSMENT**

Govan Brown recognizes the importance of ongoing training in the health and safety program. As business processes evolve, training programs need to adapt to new information and situations. To prioritize health and safety awareness and foster a safety-focused workplace culture, an ongoing improvement training program is crucial.

To ensure an effective training program, Govan Brown follows a formal needs assessment process, including:

### **Training needs analysis:**

- Identify training needs at various employee levels and job roles.
- Gather information through surveys, interviews, observations, and supervisor feedback.
- Assess specific competencies and knowledge areas that require training.
- Analyse required skills and knowledge to protect workers from identified hazards and risks.
- Review workplace data, such as risk assessments, job analyses, incidents, audits, and inspections.
- Assess demands associated with hazardous situations.
- Evaluate trainees' abilities and future training needs.

### **Reviewing legislated and other training requirements:**

- Review relevant health and safety legislation, regulations, and standards.
- Consider industry-specific training requirements and best practices.
- Ensure compliance by including mandatory training topics

### **Taking into consideration different levels of responsibilities, abilities, language skills, and literacy:**

- Recognize varying responsibilities, abilities, language skills, and literacy levels.
- Tailor the training program with clear language, visual aids, and supplementary resources.
- Incorporate different learning methods to accommodate diverse learning styles.

### **Information of company OHS program:**

- Training program needs and objectives determined by interrelated and interacting procedures within the scope of the current OHS Program and updated revisions.
- Introduce participants to the company OHS Program and updated revisions.
- Provide information on the purpose, goals, and objectives of the OHS Program and updated revisions.
- Explain the roles, responsibilities, and rights of employees within the OHS Program framework.
- Emphasize the importance of conformity to OHS Program requirements and the potential consequences of deviations or noncompliance.
- Highlight the significance of workers' participation and engagement in maintaining a safe and healthy work environment.

## **TRAINING ADMINISTRATION AND MANAGEMENT**

To ensure an effective training program, Govan Brown established and implemented a formal training administration and management process, including:

### **Identify training needs and elaborate general plan:**

- Review training needs assessment outcomes to identify the specific OHS training requirements for employees.
- Consider feedback from supervisor and clients specific needs with identified skills gaps and training requirements.
- Consider legislative requirements, job roles, hazards, and the organization's OHS program.
- Elaborate training planning arrangements that outline the objectives, topics, and delivery methods for each training module.
- Determine the sequence and frequency of training sessions based on priority and compliance requirements.

### **Select training methods and resources:**

- Choose appropriate training methods and resources, such as classroom training, e-learning modules, hands-on demonstrations, or external trainers.
- Ensure that the selected methods align with the learning styles and needs of the target audience.

### **Deliver training:**

- Schedule and organize training sessions according to the training plan.
- Provide clear instructions and information to participants regarding the training schedule, location, and any required materials.
- Ensure that trainers are knowledgeable, experienced, and capable of effectively delivering the training content.

**Monitor and evaluate training:**

- Monitor the progress and attendance of participants throughout the training program.
- Seek feedback from participants and trainers to assess the effectiveness of the training content, delivery methods, and overall satisfaction.
- Conduct evaluations and assessments to measure the participants' understanding and retention of the training material.

**Maintain Training Records:**

- Company training and orientation database is managed and updated through electronic platform and/or with retention of scanned hardcopies of records of training.
- All company training and orientation records, including meeting minutes, training /meeting attendance sheets, completion certificates, and evaluation results records of training, safety talk records, hazard assessment training documentation and related responses, are carefully maintained in a secure and accessible manner and stored in electronic database and/or scanned physical files at the head office. This ensures accessibility, traceability, and compliance with regulatory requirements regarding training and orientation documentation and ensures a comprehensive history of our training process for future reference, audits, or compliance purposes.
- Documentation and records of training events managed and readily available for each employee with monitoring of training progress and completion as well as measuring the achievement of training objectives.

**Review and update training program:**

- Regularly review and evaluate the training program to identify areas for improvement.
- Incorporate feedback from participants, trainers, and changes in legislation or best practices.
- Update training materials and methods as necessary to ensure the program remains relevant and effective.

**Communicate and Reinforce Training:**

- Continuously communicate and reinforce the importance of OHS training to employees, emphasizing its relevance to their job roles and workplace safety.
- Encourage a culture of continuous learning and ongoing participation in OHS training initiatives.

**TRAINING AND LEARNING EVALUATION**

To ensure an effective training program and measure the achievement of training objectives, Govan Brown might use variable evaluation methods including but not limited:

**Verbal assessment:**

- Conduct interviews or discussions to assess understanding and application.
- Use open-ended questions to encourage explanations and insights.

**Observation:**

- Assess participants' skills and application through practical exercises or simulations.
- Observe adherence to procedures, equipment usage, and overall performance.

**Self-Assessment:**

- Participants evaluate their own progress using self-assessment tools or questionnaires.
- Reflect on understanding, skills, and areas for improvement.

**Feedback surveys:**

- Collect feedback through post-training surveys or questionnaires.
- Rate training experience, content relevance, and delivery effectiveness.
- Include open-ended questions for specific comments or suggestions.

**Performance evaluations:**

- Evaluate performance during practical exercises or demonstrations.
- Use rubrics or checklists to assess accuracy, efficiency, and compliance.

**Focus groups:**

- Gather insights through group discussions on the training program.
- Encourage participants to share experiences and suggestions.

**Follow-Up assessments:**

- Assess knowledge retention and application after a period of time.
- Use quizzes or practical tasks to measure application in the work environment.

**Written assessments:**

- Quizzes or tests to measure understanding and retention of training material.
- Multiple-choice, short answer, or true/false questions.



**MANDATORY AND LEGISLATED TRAINING**

Govan Brown assign the mandatory training using a training provider, “Systems 24-7”. The mandatory and legislated training requirements before starting the work at company project site include:

**General Training (All Provinces, All Positions)**

- WHMIS 2015
- Ergonomics
- Current Govan Brown H&S manual
- Incident Reporting Process
- Workplace Violence, Harassment and Bullying
- Infection Control
- Govan Brown Health and Safety Policies
- Fit for Duty
- Anti-Discrimination and Harassment (SABA Portal)

**Position-Specific Training (Alberta)**

Site Management	Project Management	Office Staff
<ul style="list-style-type: none"> <li>- Accident Investigation AB</li> <li>- Asbestos Awareness</li> <li>- Asbestos Control</li> <li>- Confined Spaces AB</li> <li>- Construction Safety Basics AB</li> <li>- Fall Protection Awareness Program</li> <li>- First Aid</li> <li>- Flash Burn, Arc Eyes, and Welders Flash</li> <li>- Hot Work Permits</li> <li>- Job Hazard Analysis</li> <li>- Mould</li> <li>- Personal Protective Equipment</li> <li>- Fall Protection</li> <li>- Workplace Inspections</li> </ul>	<ul style="list-style-type: none"> <li>- Accident Investigation AB</li> <li>- Asbestos Awareness</li> <li>- Construction Safety Basics AB</li> <li>- Fall Protection Awareness Program</li> <li>- Office Safety</li> <li>- Workplace Inspections</li> <li>- Personal Protective Equipment</li> </ul>	<ul style="list-style-type: none"> <li>- Office Safety</li> </ul>

**Position-Specific Training (British Columbia)**

Site Management	Project Management	Office Staff
<ul style="list-style-type: none"> <li>- Accident Investigation BC</li> <li>- Asbestos Awareness</li> <li>- Asbestos Control</li> <li>- Confined Spaces BC</li> <li>- Construction Safety Basics BC</li> <li>- Fall Protection Awareness</li> <li>- First Aid</li> <li>- Flash Burn, Arc Eyes, and Welders Flash</li> <li>- Hot Work Permits</li> <li>- Job Hazard Analysis</li> <li>- Mould</li> <li>- Personal Protective Equipment</li> <li>- Fall Protection</li> <li>- Workplace Inspections</li> </ul>	<ul style="list-style-type: none"> <li>- Accident Investigation BC</li> <li>- Asbestos Awareness</li> <li>- Construction Safety Basics BC</li> <li>- Fall Protection Awareness Program</li> <li>- Job Hazard Analysis</li> <li>- Personal Protective Equipment</li> <li>- Workplace Inspections</li> </ul>	<ul style="list-style-type: none"> <li>- Office Safety</li> </ul>

**Position- Specific Training (Ontario)**

Site Management	Project Management	Office Staff
<ul style="list-style-type: none"> <li>- Accident Investigation ON</li> <li>- Asbestos Awareness &amp; Asbestos Control</li> <li>- Confined Spaces ON</li> <li>- Construction Safety Basics ON</li> <li>- Fall Protection Awareness Program</li> <li>- First Aid</li> <li>- Flash Burn, Arc Eyes, and Welders Flash</li> <li>- Fit for Duty Training</li> <li>- Hot Work Permits</li> <li>- Job Hazard Analysis</li> <li>- Mould</li> <li>- Personal Protective Equipment</li> <li>- Supervisor Competency</li> <li>- Worker Awareness Training / Supervisor Awareness Training</li> <li>- Working at Heights</li> <li>- Workplace Inspections</li> <li>- Incident Reporting Process</li> <li>- Fire Safety (including Fire Extinguisher Basics training)</li> </ul>	<ul style="list-style-type: none"> <li>- Accident Investigation ON</li> <li>- Asbestos Awareness</li> <li>- Construction Safety Basics ON</li> <li>- Fall Protection Awareness Program</li> <li>- Job Hazard Analysis</li> <li>- Personal Protective Equipment</li> <li>- Worker Awareness Training / Supervisor Awareness Training</li> <li>- Workplace Inspections</li> <li>- Incident Reporting Process</li> <li>- Fit for Duty Training</li> </ul>	<ul style="list-style-type: none"> <li>- Office Safety</li> <li>- Worker Awareness Training / Supervisor Awareness Training</li> <li>- Fit for Duty Training</li> </ul>

**NOTE:** Working at Heights (ON) / Fall Protection (BC & AB) training is required for all Govan Brown employees including supervisors and site managers responsible for directing work at elevations including all types of ladders. Project Managers, clients, visitors, vendors and security personnel will be exempt from having to provide proof of WAH training (ON)/Fall Protection (BC/AB). Failure to comply with these guidelines could place employees in situations immediately dangerous to life and health. Any employee who fails to comply with this safe working guidelines and site-specific procedures will be subject to disciplinary action up to and including termination.

### **IN-HOUSE WORKPLACE TRAINING & ORIENTATION**

Govan Brown will ensure that qualified competent person assigned and delivers the in-house workplace training prior to start work and provides mandatory orientation to young workers, returning workers or workers who change job roles within the organization. In-house competent person competencies include but not limited:

- Sound knowledge of health and safety legislation, regulations, and company policies.
- Ability to effectively communicate and enforce health and safety rules and procedures.
- Proficient in hazard identification and risk assessment in the workplace.
- Skilled in implementing control measures to mitigate risks and hazards.
- Competent in providing training and instruction to workers on safe work practices.
- Ability to monitor and assess worker compliance with health and safety protocols.
- Proficient in incident reporting, investigation, and implementation of corrective actions.
- Knowledge of emergency response procedures and ability to lead during emergencies.
- Strong interpersonal and leadership skills to motivate and engage workers in safety initiatives.
- Understanding of ergonomics and the importance of promoting a healthy and safe work environment.

### **NEW EMPLOYEE SAFETY ORIENTATION**

Training and orientation induction are mandatory for all workers prior to start work including young workers, returning workers or workers who change job roles within the organization.

The New Employee Orientation will be provided by Govan Brown for all new personnel within one week of hire. The New Employee Orientation will consist of the formal documentation of general safety requirements and verification of worker competency.

**General Safety orientation is an overview of the essential regulatory and organizational requirements and at minimum includes:**

- |   |   |
|---|---|
| <ul style="list-style-type: none"> <li>• Personal Health &amp; Safety Responsibilities</li> <li>• Company Health &amp; Safety policies, procedures and safety rules</li> <li>• Role of the Health &amp; Safety Representative and JHSC/JOHSC</li> <li>• Required safe work practices/ safe job procedures</li> <li>• Use of applicable PPE (Personal Protective Equipment)</li> <li>• Reporting and correcting of hazards</li> <li>• Reporting of incidents and near misses, including injuries and occupational illnesses</li> <li>• Worker Rights (right to refuse, right to know, right to participate)</li> <li>• Health and safety responsibilities</li> <li>• Task specific hazards and controls</li> <li>• Hazard reporting</li> <li>• Applicable regulatory requirements</li> </ul> | <ul style="list-style-type: none"> <li>• Refusing unsafe work</li> <li>• Emergency procedures &amp; First Aid</li> <li>• WHMIS</li> <li>• Requirements with regard to first aid services and attendants</li> <li>• Violence/Harassment</li> <li>• Workplace inspections</li> <li>• Training &amp; Communication</li> <li>• Discipline/enforcement policies</li> </ul> |
|---|---|

### **SITE SAFETY ORIENTATION**

Site Safety Orientation / Job Specific Training covers the essential or specific Health & Safety requirements & safe job procedures supplementing the general safety orientation. The Site Safety Orientation / Job Specific Orientation must be completed prior to the worker commencing floor duties for both field operations and administration. The job specific should include a walking tour of the site. Items to be addressed include but not limited:

- |  |  |
|--|--|
| <ul style="list-style-type: none"> <li>• Workplace Health &amp; Safety policies and safety rules</li> <li>• Site Safety Orientation / Job specific Safe Job procedures</li> <li>• PPE use, care and maintenance</li> <li>• The workplace inspection process and the worker(s) role</li> <li>• Emergency preparedness and First aid procedures</li> <li>• Equipment Maintenance and Operation</li> <li>• Transportation of Dangerous Goods</li> </ul> | <ul style="list-style-type: none"> <li>• MSD Prevention</li> <li>• Slips, trips, falls</li> <li>• Mobile equipment, Driver Safety</li> <li>• Lockout / machinery safety</li> <li>• Return to Work</li> <li>• Job Hazard Analysis/Hazard Assessment</li> <li>• Designated Substances</li> </ul> |
|--|--|

### **SUPERVISOR/SITE MANAGER TRAINING**

Managers and Supervisors are the foundation for the practice and overall success of the health & safety system. They are responsible and accountable for the day-to-day management and promotion of safe work procedures. Since managers and supervisors participate in the training of employees, thorough training of managers and supervisors to ensure competency is crucial. Training will ensure to include the MLTSD Supervisor Health and Safety Awareness 5 Steps, supervisor accountabilities and/or to cover key topics including

#### **Supervisor accountabilities include:**

- Ensuring each employee is fully trained and has adequate, safe equipment to use
- Conducting accident investigations
- Participating in safety meetings
- Giving complete, specific job instructions
- Ensuring that employees wear personal protective equipment
- Recognition of hazards and advising workers of any hazards
- Setting a good example

#### **Key elements to effective competent supervision include:**

- Consistently correct unsafe behaviour
- Emphasize safe behaviour
- Model safe behavior
- Conduct ongoing training
- Assessing the workplace, equipment, and employees
- Correct unsafe conditions without undue delay
- Promote safe culture
- Be a Safety Ambassador

#### **Verification of Training**

Written records of the training provided are absolutely necessary to show compliance per Occupational Health & Safety Act and Regulations. They are vital to proving due diligence, tracking worker training, identifying training needs, eliminating unnecessary repeat of training.

#### **Important guidelines:**

- Keep records of all on the job training and forward applicable copies to the health and safety coordinator.
- Verify any trade qualifications, especially those gained before employment at Govan Brown. This includes qualifications such as trade certification, first aid tickets, etc.
- Keep records of specialized education (e.g., Rigging, Forklift, Propane in construction, Defensive driving, WHMIS, TDG).
- Keep records of all training in emergency procedures (including emergency evacuation drills).
- Record situations in which the employee had to be corrected on the job for a serious safety infraction and the resulting retraining that was done.

### **ONGOING TRAINING**

Training should be a continuous process for all workers. There are several ways you can deliver ongoing training.

#### **Continuous Monitoring and Evaluation**

Whenever you are on the worksite you should be watching for health and safety concerns and commenting regularly on what you see. You should comment every single time you see an unsafe condition or an unsafe act. If you see something and let it go, you might as well tell the person: "Don't believe what I said earlier about that safety practice; it's not really important."

#### **Job Coaching**

Job performance coaching is the day-to-day actions taken to help employees perform as well as possible. There are two kinds of job coaching:

- Corrective coaching to get people back on track; to resolve performance problems.
- Developmental coaching to keep people on the right track and to help them learn, grow and make progress.

This can be accomplished utilizing a safety observation form to be completed by the supervisor.

#### **Coaching Tips**

- Emphasize performance, not personality
- Use facts and examples
- Avoid "ancient history"
- Show both the improvements and problems
- Don't hide things
- Keep confidence

## **STRUCTURED TRAINING SESSIONS**

Govan Brown will use recognized, qualified and certified training providers for the structured training sessions. Training providers must ensure all training program materials used for the approved training program are:

- legible and of good reproductive quality;
- available in sufficient quantity (including all learning materials, equipment and learning aids);
- free of bias, including but not limited to gender;
- free from defamatory statements, including but not limited to products and equipment;
- compliant with copyright rules;
- appropriate for targeted learner language and literacy level; and
- compliant with the requirements of the Accessibility for Ontarians with Disabilities Act, 2005 and its regulations, as applicable.

All training program materials must meet the requirements of provincial training program standards (e.g., Working at Heights Training Provider Standard).

Records of completion structured training session training will include at minimum the:

- worker's name
- approved training provider's name
- name of the approved training program
- date on which the training was successfully completed

Company will manage and update a training and orientation database, maintaining documentation and records of training events readily available. Records will be periodically reviewed and workers with expired training and/or close to expiry will be provided with notice for renewal.

## **COMMUNICATION**

- Govan Brown Training Policy, Program and Procedures located in the Govan Brown health and safety binder and be posted in the workplace H&S safety Boards.
- Govan Brown 's Training Policy, Program and Procedures will be communicated to all new Govan Brown workers, supervisors, and managers through new employee general orientation or site-specific induction and/or through periodic management and staff safety meetings or toolbox talk meetings.
- All existing Govan Brown staff will receive orientation through the OHS Program / Occupational Health and Safety Management System (OHSMS) orientation and /or through Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC)/Joint Occupational Health and Safety Committee (JOHSC) communication and periodic management and staff safety meetings as well as through periodic and ongoing safety training, internal communication protocols or structured training sessions.
- This procedure will be made available at the point of use to workers, subcontractors and suppliers upon request

## **TRAINING**

- All new managers, supervisors, and workers will receive training Govan Brown Training Policy, Program and Procedures during their on-boarding training upon hire.
- All new employees will receive awareness training as part of their orientation on their specific health and safety roles and responsibilities through the new hire orientation process.
- All existing employees will receive training on their health and safety roles and responsibilities through periodic staff OHS Program / Occupational Health and Safety Management System (OHSMS) orientation safety meetings as well as through periodic and ongoing safety training or structured training sessions.
- Verification of training will be confirmed via sign off and may include knowledge verification testing.

## **EVALUATION**

- This procedure will be reviewed on annual basis by Senior Management and /or during the annual OHS Program / Occupational Health and Safety Management System (OHSMS) internal audit and maybe changed due to business needs, any legal requirements and based on the results of the evaluation to ensure it continues to meet OHS regulation and standards and to ensure it is relevant with current operations and any changes will be indicated in the meetings minutes or reflected on the revision page.
- The Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) and management will also be involved with the evaluation by analyzing forwarded items of concern and suggesting corrective action.
- On a yearly basis, management will review OHS Program / Occupational Health and Safety Management System (OHSMS) to assess whether it is still compliant with current regulations and with the current work environment. If necessary and if required procedure will be amended to reflect the current operation.

- After the year-end audit a thorough analysis of the gaps identified will be conducted by the Internal Auditor & Senior Management will develop an action plan that addresses the deficiencies with an overall goal of continual improvement.
- Senior Management at least annually or more often as required should review and validate company Document Control Master List with indication supporting documents needed to implement, monitor and maintain active OHS Program / Occupational Health and Safety Management System (OHSMS) effectively and assess conformance with business, corporate and legal requirements as well as compliance with applicable standards.
- Document Controller or Designee will coordinate and manage Document Control Register to ensure changes to, and current versions status of, documents are identified and tracked in order to prevent the unintended use of obsolete documents and identify such documents if they are retained for any purpose.

## **REFERENCES**

Occupational Health and Safety Act R.S.O. 1990

OHS Program / Occupational Health and Safety Management System (OHSMS)

Document Control Master List

Document Control Register

Competency Framework

Training Matrix or equivalent training and orientation database

Employee Orientation Checklist & Site Orientation Checklist

Safety Toolbox Talk Form

Meeting / Training Sign in Sheet

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## COMMUNICATION POLICY STATEMENT

Govan Brown Associates Limited Senior Management recognizes the right of workers to work in a safe and healthy work environment and is committed to support arrangements to foster a safe and healthy work environment through the health and safety communication with workers.

Govan Brown Associates Limited as employer committed to provide information, training, instructions and supervision to management, supervisors, and workers which will cultivate appreciation of their personal responsibilities for health and safety within the framework of the minimum standards outlined by legislation and develop their awareness and understanding of the specific hazards and risks associated with their jobs and working environment as well as inform them of the control measures that are in place and any related safe procedures that must be followed.

Govan Brown Associates Limited will encourage all levels of organization to be involved in health and safety communication processes and apart from satisfying legal obligations as well as meeting the corporate requirements and operational needs Govan Brown Associates Limited's communication policy and procedural framework is also aiming to:

- Communicate information, training and instruction to workers to protect their health or safety;
- Promote positive attitudes and improve safety culture;
- Reduce accident severity and frequency as well as injury and ill-health related absence;
- Encourage and support employees' consultation and two-way communication
- Increase levels of compliance;
- Improve staff morale and retention as well as corporate reputation;

Govan Brown Associates Limited Health and Safety Policy and Program will be communicated and reviewed by management to determine what further training, communication and information the employee needs to have to do the job safely.

Govan Brown Associates Limited will maintain effective systems in place to communicate important health and safety information to all affected employees through utilization of various methods including but not limited:

- Management and staff H&S meetings
- Safety/Toolbox Talks
- Safety bulletins, Memorandums
- Postage and correspondence on Safety boards
- Annual reviews

It is in the best interest of all parties to consider health and safety in every activity. Commitment to health and safety communication must form an integral part of our organization, from the president to the workers. Govan Brown Associates Limited senior management is committed to work jointly and communicate with relevant personnel in the development and implementation of the Health and Safety Program as well to set and review health and safety objectives as part of our continual Health and Safety performance improvement.



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Colin Gray

President – Govan Brown Associates Limited

March 22/24

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Date

## COMMUNICATION PROGRAM & PROCEDURE

### PURPOSE

Govan Brown understands the importance of providing a safe and healthy work environment for its employees. To ensure this, Govan Brown has developed a Communication Program. The program aims to provide clear guidelines and procedures for effective communication about health and safety requirements. It also ensures that all employees, including supervisors and workers, have the necessary knowledge of regulations and safe work practices to perform their jobs safely. Govan Brown is committed to open communication and encourages employees to share their concerns and questions with their supervisors and management.

### SCOPE

The Communication Policy and program apply to all supervisors, managers, workers, and subcontractors at Govan Brown. This program is designed to promote effective communication at all levels of the organization, fostering a culture of safety and well-being.

## ROLES AND RESPONSIBILITIES

### MANAGEMENT

- Develop clear communication policies and procedures for health and safety.
- Ensure that safety-related information is communicated clearly and effectively to all employees.
- Promote open and transparent communication, encouraging employees to report concerns and provide feedback.
- Provide training to managers on effective communication strategies.
- Establish two-way communication channels between management and employees.
- Actively listen to employee concerns and address them promptly.
- Collaborate with worker representatives to facilitate effective communication.
- Regularly evaluate and improve communication efforts.

### SUPERVISOR

- Facilitate clear communication of safety information to workers.
- Lead by example and actively engage with workers to address their concerns.
- Conduct regular safety meetings to discuss safety topics and provide updates.
- Provide proper training and instruction on safety procedures and protocols.
- Encourage open communication within teams and create a supportive environment.
- Collaborate with management and worker representatives to address communication issues.
- Monitor the effectiveness of communication methods and make necessary adjustments.
- Maintain accurate documentation of safety communication and records.

### WORKERS

- Actively participate in safety communication and discussions.
- Follow established communication procedures for reporting hazards and incidents.
- Promptly report identified hazards, unsafe conditions, or incidents.
- Follow safety instructions provided by supervisors and seek clarification when needed.
- Support a positive safety culture by encouraging open communication.
- Attend safety meetings and training sessions to stay informed.
- Utilize communication tools effectively to access and share safety information.
- Comply with safety policies, procedures, and protocols in the workplace.

### CONTRACTOR/SUBCONTRACTOR

- Familiarize with communication procedures for health and safety.
- Comply with company safety communication requirements and guidelines.
- Promptly report hazards, incidents, or unsafe conditions to Govan Brown.
- Communicate safety concerns or questions to Govan Brown.
- Attend safety meetings and training sessions as required.
- Follow Govan Brown safety policies, procedures, and protocols.
- Support a positive safety culture by actively engaging in safety communication.
- Encourage others to adhere to safety communication protocols and report safety concerns.

## KEY COMPONENTS PROMOTING HEALTH & SAFETY CULTURE

Effective communication is a key component in promoting a positive health and safety culture within an organization. Govan Brown recognizes the importance of providing information and training to employees to increase their awareness and understanding of job-related hazards, control measures, and safe procedures. Govan Brown management will ensure that communication program focuses on the following:

### **Mutual trust and shared perceptions:**

- Communication is based on mutual trust, fostering an environment where employees feel comfortable sharing health and safety concerns and ideas.
- Shared perceptions of the significance of health and safety create a collective commitment to preventive measures.
- The organization actively encourages open dialogue, promoting transparency and building trust among all stakeholders.

### **Benefits of Information and Training:**

- Providing employees with accurate and relevant information helps them understand the importance of health and safety in their work environment.
- Effective training equips employees with the necessary knowledge and skills to identify hazards, follow safe procedures, and contribute to a safer workplace.
- The benefits of communication information and training include:
  - Reduction in accident severity, frequency, and absenteeism due to injury or illness.
  - Reduction in the severity and frequency of accidents, leading to a safer work environment.
  - Decreased absenteeism due to injuries or illnesses, resulting in improved productivity.
  - Potential reduction in compensation claims and insurance premiums, benefiting both the organization and employees.
  - Strengthening the overall health and safety culture within the organization, creating a shared commitment to safety.
  - Increased staff morale and retention, as employees feel valued and supported in their health and safety efforts.

To achieve these objectives, Govan Brown implements a comprehensive communication program that ensures clear and effective dissemination of information. The program utilizes various communication channels, such as meetings, training sessions, written materials, and digital platforms, to reach all employees. It considers the diverse abilities, language skills, and literacy levels within the organization to ensure that communication is accessible and easily understood by everyone.

By prioritizing communication, Govan Brown aims to create a work environment where information flows freely, employees actively participate in safety initiatives, and the organization as whole remains committed to continuous improvement in health and safety practices.

## **MANAGEMENT COMMITMENT AND LEADERSHIP**

Management commitment is vital for fostering a safety-oriented environment throughout the organization. Govan Brown demonstrates its commitment through the following actions:

### **Visible and engaged leadership:**

- Hold regularly scheduled organization-wide OHS meetings with all employees, at least annually
- Management actively participates in the work, addressing any deficiencies and taking corrective action.
- An open-door policy encourages workers to raise concerns related to health and safety.
- Ownership and personal responsibility for health and safety are promoted, encouraging employees to take an active role in their own safety.

### **Promoting improvements:**

- The status of health and safety committees and practitioners is regularly reviewed, emphasizing their visibility and importance within the company.
- Regular reports on health and safety performance are produced, and appropriate actions are taken based on the findings to continuously improve health and safe environment.

### **Provision of Resources:**

- Adequate resources, including personnel, time, and funding, are allocated to ensure that safe work practices can be implemented effectively.
- Appropriate personal protective equipment is provided to protect workers from hazards.



**Competency and Training:**

- Govan Brown ensures that all personnel have the necessary competencies to carry out their work safely by providing relevant training.
- Training covers all aspects of the job, including health and safety considerations, to equip employees with the knowledge and skills needed for their roles.

**Enforcing Safety Rules:**

- Company safety rules are consistently enforced to maintain a safe working environment.
- Management leads by example, promptly correcting defects and not allowing double standards to persist.

**COMMUNICATION TRANSMISSION**

Effective communication plays a vital role in the functioning of Govan Brown as an organization. The way information is obtained and transmitted has a significant impact on the organization's operations and its approach to health and safety.

Communication within the organization can be categorized into formal and informal channels. Formal communication refers to the official channels established within the organizational structure, while informal communication is spontaneous and unplanned. Both types of communication can convey information related to health and safety.

Formal communication channels typically involve interactions between different levels of the organizational structure or between individuals or groups at the same level. These channels serve as a structured way to exchange information and ensure coordination within the organization.

Informal communication, on the other hand, occurs through unofficial means and is often spontaneous. It can occur across divisions or among individuals and groups within the organization. Although informal communication may not follow a predetermined structure, it still has the potential to convey important information about health and safety.

Recognizing the significance of both formal and informal communication, Govan Brown acknowledges the importance of establishing effective communication channels to ensure the proper flow of information related to health and safety throughout the organization.

- **Downward communication** is the flow of information from a higher level to one or more lower levels in the organisational structure. It is often concerned with passing directions about the performance of tasks or about the procedures and practices of the organisation. In terms of health and safety, this is the main channel through which management seeks to develop understanding of safety needs in general and the specific requirements associated with particular jobs. The types of communication employed include face-to-face meetings (private or public, formal and informal, between individuals and groups) and a variety of written communications, such as memoranda, bulletins, newsletters, notice boards, manuals, etc.
- **Upward communication** is the flow of information from a lower level to one or more higher levels in the organisational structure. It is usually concerned with reporting progress, problems, new developments and situations which require attention, making suggestions for improvements, seeking clarification, and questioning. The types of communication involved include written reports and memoranda, meetings with superiors (individually or in groups), suggestion schemes and attitude surveys. In addition, specific formal systems for dealing with staff problems through grievance procedures, and for joint consultations with trade unions, may be brought into play.
- **Horizontal communication** is the flow of information between individuals at the same level within a particular section or department, or between individuals or groups at different levels in different sections or departments. This is often concerned with the provision of information and advice from specialists outside the immediate work unit, as well as coordinating activities, sharing information and resolving conflict or problems. The types of communication involved include formal meetings, reports, memoranda and face-to-face meetings.
- **Informal communication** involves a wealth of social conversations which take place in the workplace and these can be very significant in conveying information around and among staff. Often, it is the main way in which detailed information circulates about the way systems and procedures work in practice, as opposed to the official line – although the “grapevine” can be a problem in providing false or incomplete information.

Health and safety may be addressed through all of these channels, with safety representatives and safety committees being an important part of the formal systems.

## **SUPERVISION**

Govan Brown places great importance on effective supervision to ensure the safety and well-being of employees. A competent supervisor will be assigned to provide direction and monitor employees in the performance of their duties. In addition to fulfilling regulatory requirements, the supervisor will possess the following qualifications:

- Qualified through knowledge, training, and experience to effectively carry out assigned responsibilities.
- Knowledgeable about the hazards and risks associated with the job or task to be performed.
- Able to recognize, evaluate, and control hazards and risks to ensure a safe work environment.
- Works in a manner that safeguards personal health and safety, as well as the health and safety of others.
- Familiar with the laws and regulations relevant to the work being done.

By having competent supervisors with these qualifications, Govan Brown ensures that employees receive proper guidance, support, and oversight to perform their duties in a safe and compliant manner. Supervisors play a critical role in promoting a culture of safety and mitigating risks within the organization.

## **EMPLOYEE REPRESENTATION**

At Govan Brown, we value effective communication in our health and safety program. Employee representation and consultation play a crucial role in creating a positive safety culture. This ensures that our employees actively shape health and safety initiatives and have a platform to express their concerns, suggestions, and perspectives. Employee safety representatives act as vital links between managers and employees. They facilitate communication and collaboration, given the necessary resources and freedom to fulfil their responsibilities effectively. Their contribution helps establish strong health and safety standards in our organization.

Worker representation and consultation are integral parts of our communication system. Through elected representatives, workers have a voice and participate in decisions that affect their health and safety. This involvement fosters a sense of ownership and engagement, resulting in a workforce that embraces necessary precautions and actively contributes to maintaining a safe work environment.

Worker representatives also have the opportunity to influence health and safety policies. They actively contribute to policy formulation, ensuring that employee perspectives are considered. By monitoring management performance, they hold management accountable for effective health and safety measures. Their feedback and recommendations are invaluable in continuously improving safety standards.

To facilitate effective communication, we have established robust channels between employee safety representatives, workers, and management. Regular meetings, both formal and informal, provide opportunities for open dialogue, information exchange, and addressing concerns. These channels ensure that workers are well-informed and have a chance to contribute to enhancing our health and safety practices.

Through the active involvement of employee safety representatives and promoting open communication, Govan Brown fosters a culture where workers are valued stakeholders in health and safety. We believe that including their representation and consultation allows us to strive together for a safe and healthy work environment where everyone's voice is heard and respected.

## **PROCEDURE**

Senior Management is responsible for leading and promoting effective communication practices throughout the organization. They ensure that communication channels are established and maintained, and actively participate in OHS meetings and initiatives.

Supervisors play a vital role in facilitating communication between management and workers. They ensure the accurate dissemination of health and safety information to workers and promote open channels of communication. Workers have the responsibility to actively engage in communication efforts, follow established communication protocols, and report any safety concerns or hazards to their supervisors.

Subcontractors are expected to adhere to Govan Brown communication requirements and actively participate in communication activities as outlined in their contractual agreements.

### **Communication delivery**

Govan Brown places a strong emphasis on ensuring that communication is delivered in a manner that is easily understood by the intended recipients. The organization recognizes that effective communication requires considering the abilities, language skills, and literacy levels of employees. To achieve this, the following arrangements are in place:

- **Clear and Concise Language:** Communication materials, including written documents, signs, and notices, are prepared using clear and concise language. Technical jargon and complex terminology are avoided or explained in simple terms to enhance comprehension.
- **Visual Aids:** Visual aids such as diagrams, charts, and illustrations are used to support written and verbal communication. These aids help convey information more effectively, particularly for individuals who may have difficulty understanding written text.
- **Supplementary Resources:** Additional resources are provided alongside communication materials to facilitate understanding. These resources may include audio recordings, translated versions in multiple languages, or online resources with further explanations or demonstrations.

- **Two-Way Communication:** Govan Brown encourages two-way communication to ensure understanding. Employees are actively encouraged to ask questions, seek clarification, and provide feedback on the information they receive. Supervisors and management are readily available to address any queries or concerns.
- **Training and Education:** Govan Brown invests in training programs to enhance communication skills among employees. This includes training sessions focused on effective communication techniques, active listening, and the importance of clear and accurate information exchange.
- **Multilingual Support:** For organizations with a diverse workforce, language barriers may pose a challenge. Govan Brown provides language support by employing bilingual staff, offering translation services, or utilizing multilingual materials when necessary.
- **Accessibility Considerations:** The organization ensures that communication is accessible to individuals with disabilities. Communication materials are designed with consideration for those with visual impairments, hearing impairments, or other accessibility needs. Assistive technologies and alternative formats are made available to accommodate individual requirements.
- **Regular Assessments and Feedback:** Govan Brown regularly assesses the effectiveness of its communication methods. Feedback from employees is actively sought to identify areas for improvement and address any persistent challenges or barriers to understanding.

**Worker input and feedback**

Govan Brown fosters a culture of worker involvement and encourages input from workers on health and safety matters.

workers are provided with various channels for sharing their ideas, suggestions, concerns, and observations related to safety practices.

Established arrangements to facilitate worker input include, but are not limited to, the following:

- **Verbal Direct Communication with Supervisors.** Workers have the opportunity to directly communicate with their supervisors, whether it's during one-on-one meetings, safety toolbox talks, or informal conversations. This allows for immediate feedback and discussion on safety-related matters.
- **Worker Feedback Form:** We provide a worker feedback form that workers can use to express their ideas, suggestions, concerns, and observations regarding health and safety. This form ensures that their input is captured in a systematic manner and can be addressed accordingly.
- **Surveys:** Conducting surveys allows us to gather broader perspectives from workers. These surveys can focus on specific safety topics, initiatives, or overall perceptions of the health and safety program. By soliciting feedback through surveys, we can gather valuable insights and identify areas for improvement.
- **Regular Meetings:** Scheduled meetings provide a forum for workers to actively participate in discussions on health and safety matters. These meetings can include safety committee meetings, team huddles, or town hall sessions. They provide an opportunity for workers to voice their thoughts, ask questions, and contribute their ideas to enhance safety practices.
- **Designated Representatives:** Selecting designated worker representatives who can serve as a point of contact for health and safety matters further encourages worker input. These representatives can be elected or appointed by their peers to convey their concerns, suggestions, and feedback to management. They play a crucial role in ensuring that worker voices are heard and considered in decision-making processes.

**Internal and external communication protocols**

Govan Brown has implemented organisational protocols for receiving, documenting, and responding to both internal and external OHS communications. These protocols outline the steps to be followed to ensure effective handling of incoming communications.

- **Recording and Tracking:** A systematic approach is in place to record and track all communication received. This ensures that no information is overlooked or lost. The communication may be logged in a designated intranet system or database, allowing for easy retrieval and reference when needed.
- **Accuracy and Completeness:** Special attention is given to accurately capturing the details of the communication. This includes recording the date, sender, nature of the communication, and any relevant attachments or supporting documentation. By documenting the information in a structured manner, Govan Brown can maintain a comprehensive record of all received communications.
- **Timely Responses:** Govan Brown understands the importance of providing timely responses to communication. Promptness is prioritized to address any concerns, inquiries, or requests effectively. This ensures that the sender of the communication receives acknowledgement and the necessary actions are initiated without unnecessary delay.
- **Appropriate Actions:** Based on the content of the communication, appropriate actions are taken to address any issues raised or requests made. This may involve conducting investigations, implementing corrective measures, seeking further clarification, or providing relevant information or guidance.

- Communication Channels: Govan Brown utilizes various communication channels to receive and respond to internal and external communications. This may include email, online platforms, dedicated communication tools, or other specified means of communication. The choice of communication channel depends on the nature and urgency of the communication.
- Documentation & Records Retention: All communication records, including meeting minutes, training /meeting attendance sheets, safety talk records, hazard assessment meeting documentation and related responses, are carefully maintained and stored in electronic or physical files at the head office. This ensures accessibility, traceability, and compliance with regulatory requirements regarding communication documentation and ensures a comprehensive history of our communication process for future reference, audits, or compliance purposes.

**COMMUNICATION METHODS**

There are a variety of methods that Govan Brown utilized to communicate health and safety information and/or materials throughout the organization:

- Management and staff H&S meetings
- Training Sessions
- Safety/Toolbox Talks
- Safety bulletins, Memorandums
- Hazard Assessments Meetings
- Postage and correspondence on Safety boards

Below listed samples include but not limited the main communication methods used by Govan Brown which will be documented, and records will be retained on file at head office.

**Safety meetings**

Govan Brown safety meetings offer opportunities for effectively sharing information among employees, contractors, and subcontractors.

Safety meetings assist in:

- Increase general safety awareness among participants.
- Increase worker awareness of company and legislative safety requirements for specific jobs or projects.
- Provide training in safety and procedures.
- Evaluate workers on effectiveness of understanding health and safety related topics.
- Encourage participants to provide feedback on safety matters, especially regarding hazard assessment and control.

**Management Team Meetings**

Management team meetings are held on an annual basis at a minimum or as required with all senior management. These meetings are held to discuss new or review changing policies and procedures as well as Health & Safety program performance and Company goals. Meetings are also used to discuss Company performance and action plans. Any action items or safety concerns discussed in the meeting will be communicated to all employees. Records of the meeting will be kept on file.

**Staff /Personnel Meetings**

Senior Management holds regularly scheduled organization-wide OHS meetings with all employees, at least annually or more often if required. These meetings focus on discussing the Occupational Health and Safety program and its implementation through two-way communication and provide an opportunity for Senior Management to share any revisions and updates as well as address health and safety concerns, and gather feedback from employees.

An annual review of the Occupational Health and Safety Program will also take place during the Staff/Personnel Meetings or company corporate event. Workers are encouraged to inform management of any problems impeding implementation of management policies or goals. Records will be kept on file.

**Safety talks**

A safety talk is a hands-on way to remind workers that health and safety is important on the job. Safety talks are given by the employer or manager/supervisor because they are responsible for advising workers about the existing or potential dangers to their health and safety. However, it also encourages workers to participate in safety talk. Each talk takes reasonable time and can help workers recognize and control hazards in the workplace as well as understood company safe work practices. Safety talk method could also be used for internal training on company safe work practices/safe job procedures.

Safety talks will be held on a weekly basis, as a minimum. They will be documented, and the records should include the date, topic, attendees, and facilitator, and any feedback or items resulting action items.

**Hazard Assessments Meetings**

The primary tool for ongoing safety awareness and exchange of safety information is the Hazard Assessment Meeting. This meeting involves workers and their on-site supervisor. The meeting is to be held before starting work or when the scope of work changes.

## **COMMUNICATION**

- Govan Brown Communication Policy, Program and Procedures located in the Govan Brown health and safety binder and be posted in the workplace H&S safety Boards.
- Govan Brown's Communication Policy, Program and Procedures will be communicated to all new Govan Brown's workers, supervisors, and managers through new employee general orientation or site-specific induction and/or through periodic management and staff safety meetings or toolbox talk meetings.
- All existing Govan Brown staff will receive orientation through the OHS Program/Occupational Health and Safety Management System (OHSMS) orientation and /or through Health and Safety Representative (HSR)/Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) communication and periodic management and staff safety meetings as well as through periodic and ongoing safety training, internal communication protocols or structured training sessions.
- This procedure will be made available at the point of use to workers, subcontractors, and suppliers upon request.

## **TRAINING**

- All new managers, supervisors, and workers will receive training Govan Brown Training & Communication Policy, Program and Procedures during their on-boarding training upon hire.
- All new employees will receive awareness training as part of their orientation on their specific health and safety roles and responsibilities through the new hire orientation process.
- All existing employees will receive training on their health and safety roles and responsibilities through periodic staff OHS Program/Occupational Health and Safety Management System (OHSMS) orientation safety meetings as well as through periodic and ongoing safety training or structured training sessions.
- Verification of training will be confirmed via sign off and may include knowledge verification testing.

## **EVALUATION**

- This procedure will be reviewed on annual basis by Senior Management and/or during the annual OHS Program/Occupational Health and Safety Management System (OHSMS) internal audit and maybe changed due to business needs, any legal requirements and based on the results of the evaluation to ensure it continues to meet OHS regulation and standards and to ensure it is relevant with current operations and any changes will be indicated in the meetings minutes or reflected on the revision page.
- The Health and Safety Representative (HSR)/Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) and management will also be involved with the evaluation by analyzing forwarded items of concern and suggesting corrective action.
- On a yearly basis, management will review OHS Program/Occupational Health and Safety Management System (OHSMS) to assess whether it is still compliant with current regulations and with the current work environment. If necessary and if required procedure will be amended to reflect the current operation.
- After the year-end audit a thorough analysis of the gaps identified will be conducted by the Internal Auditor & Senior Management will develop an action plan that addresses the deficiencies with an overall goal of continual improvement.
- Senior Management at least annually or more often as required should review and validate company Document Control Master List with indication supporting documents needed to implement, monitor, and maintain active OHS Program/Occupational Health and Safety Management System (OHSMS) effectively and assess conformance with business, corporate and legal requirements as well as compliance with applicable standards.
- Document Controller or Designee will coordinate and manage Document Control Register to ensure changes to, and current versions status of, documents are identified and tracked to prevent the unintended use of obsolete documents and identify such documents if they are retained for any purpose

## **REFERENCES**

Occupational Health and Safety Act R.S.O. 1990

OHS Program / Occupational Health and Safety Management System (OHSMS)

Document Control Master List

Document Control Register

Safety Toolbox Talk Form

Meeting Sign in Sheet

Worker Feedback Form

## WORKPLACE INSPECTION POLICY STATEMENT

Govan Brown Associates Limited Senior Management recognizes the right of workers to work in a safe and healthy work environment and committed to support arrangements to foster safe and healthy work environment through effective workplace inspection program, health and safety consultation and communication with workers.

Govan Brown Associates Limited as employer committed to maintain and enforce workplace inspection program which can help to identify unsafe conditions and assess risks before accidents or injuries occur including but not limited:

- To identify potential workplace problems, unsafe conditions or unsafe acts.
- To identify deficiencies in equipment, tools, vehicles and facilities.
- To assess and determine the degree of compliance with regulatory requirements.
- To identify and eliminate actual and potential workplace hazards.
- To demonstrate management support for the health and safety program.

All Govan Brown Associates Limited staff shall be vigilant and shall exercise appropriate due diligence to identify and to report workplace hazards in order to control workplace hazards through regular informal and formal workplace inspections.

The person(s) conducting the inspection should be knowledgeable about the kinds of hazards that may be present and the legal requirements that apply as well as the requirements of the Govan Brown Associates Limited health and safety program.

Any health and safety deficiencies identified during the inspection should be communicated to the immediate supervisor of the area for taking effective corrective action.

Management is responsible for ensuring appropriate corrective action occurs to address any identified workplace hazard. The JHSC/JOHSC is responsible for following up on all corrective actions and preparing written recommendations to management for any issues that have not been satisfactorily resolved. Management must provide a written response within 21 days including a timetable for implementing recommendations or reasons for any disagreement on recommendations.

The results of the inspections should be effectively communicated to the appropriate supervisor(s) and a copy should be kept on file on site and also forwarded to the company's head office for review and retention.

In order to comply with legal obligations and meeting the corporate requirements Govan Brown Associates Limited will ensure to maintain implemented workplace inspection proactive monitoring and established communication process through the workplace inspection program addressing the following points:

- frequency of inspections
- who conducts the inspection
- use of inspection checklists
- communication of inspection results
- follow up on corrective actions required
- retention/forwarding of inspection reports

Govan Brown Associates Limited also will ensure that management and supervisors receive additional training on specific health and safety program and requirements for H&S roles and responsibilities, workplace inspections, emergency response and planning as well as accident/incident investigation.



Colin Gray

President – Govan Brown Associates Limited

March 22/24

Date

## WORKPLACE INSPECTION PROGRAM & PROCEDURE

### PURPOSE

The purpose of the Govan Brown Workplace Inspection Program is to establish a standardized approach to workplace inspections and pre-use inspections in accordance with the Occupational Health & Safety Act (OHSA) and relevant regulations in Ontario, Canada. This procedure provides guidance and a framework for conducting consistent and effective workplace inspections to identify and address potential hazards and ensure a safe work environment.

Govan Brown Health & Safety program provides guidelines for regular inspections and monitoring at all locations. Thorough inspections of offices, warehouses, tools, machinery, equipment, and work practices are performed to identify workplace hazards. Inspections proactively manage health and safety by identifying and controlling hazards before they harm employees, who are our most valuable resources.

### SCOPE

This standard procedure applies to all workplace inspections and pre-use inspections conducted within Govan Brown, including supervisors, Health and Safety Representatives (HSR) or Joint Health and Safety Committee (JHSC)/Joint Occupational Health and Safety Committee (JOHSC) members, and contractor/subcontractor representatives. It encompasses inspections of tools, equipment, vehicles, work areas, and Govan Brown sites.

## ROLES AND RESPONSIBILITIES

### MANAGEMENT

- Provide guidelines for Workplace Inspections.
- Ensure Senior Management conducts at least annually a written inspection of each project site and office.
- Ensure supervisors or competent persons appointed by the supervisor conduct formal inspections of their respective work areas at minimum weekly.
- Maintain and review workplace inspection statistics on a monthly basis.
- Record and correct identified deficiencies in a timely manner.
- Review and address findings from Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC), subcontractor, and third-party inspections.
- Establish a workplace inspection schedule.
- Develop an action plan to address identified deficiencies from workplace inspections and pre-use inspections outcomes.
- **Specific to Province of Alberta:** Ensure workers required to lead inspections receive and participate in training (Leadership for Safety Excellence, etc.)

### HEALTH & SAFETY REPRESENTATIVE (HSR) /JOINT HEALTH AND SAFETY COMMITTEE (JHSC) /JOINT OCCUPATIONAL HEALTH AND SAFETY COMMITTEE (JOHSC)

- Conduct and review monthly workplace inspections of Govan Brown sites.
- Assist other team members in completing applicable monthly inspections.
- Use workplace inspection forms to document and forward inspection reports to management for review.
- Correct hazards immediately during inspections whenever possible.
- Notify the manager, supervisor or JHSC/JOHSC of any hazards that cannot be immediately corrected, noting them on the inspection report.
- Assist in correcting hazards based on the corrective action report provided by management upon direction from the supervisor and JHSC/JOHSC.

### SUPERVISOR

- Conduct formal inspections of their respective work areas at minimum weekly.
- Conduct informal inspections during routine visits to work areas where their supervised workers are present.
- Maintain the health and safety of workers under their supervision.
- Identify and communicate foreseeable hazards to workers.
- Ensure all necessary inspections, including formal, informal, and special inspections, are carried out promptly and resulted communicated to relevant parties.
- Thoroughly review monthly workplace inspections with the HSR representative and sign off when complete.
- Participate in workplace inspections accompanying the HSR/JHSC/JOHSC representative.
- Implement recommendations arising from inspections to reduce or control hazards.
- Ensure inspectors are trained and knowledgeable.
- Train, instruct, authorize, and supervise workers to perform their jobs safely.
- Promote a safe and healthy working environment.
- **Specific to Province of Alberta:** Participate/ receive training in leading work site inspections.

**WORKERS**

- Perform informal pre-operational inspections on tools, equipment, vehicles, or machinery.
- Participate in formal and informal workplace inspections as required.
- Immediately correct (if possible) and report any known hazards to supervisor.
- Suggest improvements or hazard reduction and controls measures in the workplace.
- Exercise the right to refuse unsafe work.
- Take reasonable care to protect the health and safety of others affected by their work.

**CONTRACTOR/SUBCONTRACTOR JOINT HEALTH AND SAFETY COMMITTEE (JHSC) /JOINT OCCUPATIONAL HEALTH AND SAFETY COMMITTEE (JOHSC) REPRESENTATIVE**

- Conduct and review monthly workplace inspections of Govan Brown sites.
- Assist other team members in completing applicable monthly inspections.
- Use workplace inspection forms to document and forward inspection reports to management for review.
- Correct hazards immediately during inspections whenever possible.
- Notify the manager or JHSC/JOHSC of any hazards that cannot be immediately corrected, noting them on the inspection report.
- Assist in correcting hazards based on the corrective action report provided by management upon direction from the manager or JHSC/JOHSC.

**CONTRACTOR/SUBCONTRACTOR**

- Conduct inspections of work conditions and acts, making recommendations as required.
- Perform informal inspections during routine visits to work areas where their supervised workers are present.
- Maintain the health and safety of workers under their direct supervision.
- Identify and communicate foreseeable hazards to contractor/subcontractor workers.
- Ensure all necessary inspections, including formal, informal, and special inspections, are carried out promptly.
- Thoroughly review monthly workplace inspections with the contractor/subcontractor JHSC/JOHSC representative and sign off when complete.
- Participate in workplace inspections accompanying the contractor/subcontractor JHSC/JOHSC representative.
- Implement recommendations arising from inspections to reduce and control hazards.
- Ensure inspectors are trained and knowledgeable.
- Train, instruct, authorize, and supervise workers to perform their jobs safely.
- Promote a safe working environment.

**PROCEDURE**

The workplace inspection when properly used and implemented will reveal hazards (acts and or conditions) that could, if not corrected, result in:

- |                       |                                  |
|-----------------------|----------------------------------|
| - Injury to people    | - Reduced productivity           |
| - Damage to equipment | - Harm the environment           |
| - Loss of materials   | - Result in occupational illness |

Govan Brown has established a systematic approach to workplace inspections to identify potential hazards and nonconformities.

Supervisors and designated personnel are responsible for conducting regular workplace inspections. Inspection records will be maintained to document identified hazards, nonconformities, and corrective actions taken. Workers are encouraged to actively participate in the inspection process and provide their input and observations. Govan Brown provides standardized forms for recording workplace inspections, ensuring consistency and accuracy in documentation.

**Workplace Inspection Records**

Govan Brown ensures the completion and retention of workplace inspection records, including those focused on identifying and preventing potential non-conformities and implementing corrective actions. These records are carefully maintained, whether stored electronically or in physical format, and are kept at both the workplace location and/or head office. This diligent record-keeping ensures accessibility, traceability, and regulatory compliance, facilitating comprehensive documentation of the inspection process for future reference, audits, or compliance assessments.

Govan Brown retains documented inspection records and workplace inspection statistics records. The minimum requirements include at least the following:

- meeting inspection frequencies,
- involving workers in the inspection process,
- correcting identified deficiencies in a timely manner,
- communicating the results of workplace inspections to senior management,
- sharing inspection reports with all relevant workplace parties.



All vehicles, machinery, tools, and equipment shall be maintained in a safe condition that does not endanger workers.

Usage is prohibited under the following circumstances:

- When the equipment is defective or hazardous.
- When weather or other conditions pose a risk to worker safety.
- While the equipment is being repaired or serviced, unless operation is necessary for the repair or service process.

Compliance with equipment operating manuals issued by manufacturers is essential.

Mechanically powered vehicles, machines, tools, and equipment rated over 10 horsepower are inspected by competent workers to determine their capacity and identify any defects or hazardous conditions in accordance with provincial acts and regulations (O. Reg 213/ 91 Alberta OHS/WorkSafe BC) and manufacture’s guidelines.

Initial inspections are conducted before the equipment is first used on a project, followed by subsequent inspections at least once a year or as recommended by the manufacturer.

In case of damaged or defective tools, equipment, or vehicles, workers must notify their supervisor for proper removal from service and tagging out.

Overdue or defective tools, equipment, and vehicles are tagged and removed from service for repair or disposal.

Defective personal protective equipment (PPE) must be immediately reported to the supervisor and replaced to ensure adequate protection.

**Inspection Practices**

The things to consider when conducting workplace inspection includes, but not limited to:

- Violations of safety regulations.
- Potential hazards.
- Existing hazards.
- The causes behind the problems.

Previous inspection records are reviewed, and commonly reported hazards are noted for future reference.

Workers familiarize themselves with the unique hazards present in their workplace.

Using their senses, workers identify actual or potential problems during inspections and record hazards on the workplace inspection form / site safety inspection form or equivalent.

Immediate action is taken to correct unsafe conditions when noted.

Attention is given to identifying the underlying causes of sub-standard conditions, practices, and procedures.

Take time to observe the activities of all personnel

Record all unsafe acts and conditions. On completion of the tour, rank the unsafe acts/conditions on a “worse case first” basis

Identify corrective action required for each unsafe act/condition

Assign a person responsible for each corrective action and a date for completion

Inspection results communicated to senior management and copy of the inspection form is retained on the project site for reference.

Inspection findings are reviewed with the Health and Safety representative during toolbox talks and management meetings.

**Follow-Up Actions:**

Unsafe conditions, practices, or procedures are addressed promptly by taking appropriate corrective measures whenever possible.

Warning signs and barricades are used to keep workers away from hazardous areas, accompanied by verbal warnings if necessary.

Management is notified of the identified conditions, and the details, actions taken, and dates are recorded on the inspection form.

The workplace inspection form or equivalent is completed, ensuring proper documentation and filing with safety records.

When a worker is observed engaging in an unsafe act, they are informed of the hazardous situation and engaged in a discussion about it.

Workers are advised on how to correct the unsafe condition and followed up on to ensure compliance.

Ongoing communication with supervisors is maintained to address any concerns or issues identified during inspections.

### **COMPLIANCE WITH LEGISLATION AND MANUFACTURER'S REQUIREMENTS**

Govan Brown is fully committed to meeting all legal obligations as outlined in the provincial acts and regulations, Occupational Health and Safety Act (OHSA) and other applicable health and safety legislation under the OHSA as required including but not limited:

- O. Reg. 213/91 Construction Projects
- Reg. 851 Industrial Establishments
- Reg. 1101 First Aid Requirements
- Highway Traffic Act
- Fire Protection and Prevention Act
- Building Code

Equipment inspections will adhere to manufacturers' guidelines and operating manuals to ensure safe and proper usage.

Govan Brown has defined the scope of workplace inspections, outlining the areas, equipment, and specific items to be inspected.

A comprehensive checklist has been developed to cover all relevant aspects of health and safety, equipment condition, and potential hazards. as well as legislative requirements.

### **COMMUNICATION OF INSPECTION RESULTS**

Govan Brown has established a comprehensive process for communicating inspection outcomes to all levels of the organization, including senior management, workers, supervisors, and Health & Safety representatives. Following the completion of inspections, detailed reports containing identified hazards and recommended corrective actions are compiled. These workplace inspection reports are then forwarded to senior management and relevant stakeholders via email distribution or through a designated online platform or as physical copy. Copies are prominently displayed on workplace notice boards for easy access. To ensure effective communication, regular meetings are scheduled where inspection findings and outcomes are reviewed and discussed among management, supervisors, and Health & Safety representatives. This collaborative approach allows for prompt decision-making and the implementation of necessary corrective measures. Furthermore, workers are briefed on workplace inspection results during toolbox talks or safety meetings, providing them with valuable insights into workplace hazards and the organization's commitment to safety. This systematic communication process ensures that all stakeholders are informed and engaged in addressing safety concerns proactively.

### **INSPECTION SCHEDULE**

Govan Brown has established specific inspection frequencies to ensure regular and thorough workplace and pre-use inspections.

Supervisors are responsible for scheduling and conducting inspections, while workers may be involved as required. Clear roles and responsibilities are defined for each party involved in the inspection process to ensure accountability.

- Planned inspections will occur weekly on project sites and monthly at the company premises. Supervisors and/or sub-contractors and the health and safety representative will be involved in workplace inspections.
- Construction Projects require weekly inspections, or as determined by other elements in the manual (Vehicle/Equipment, etc.)
- Monthly inspections of the workplace are to be performed by the health and safety representative/JHSC/JOHSC.
- Annual review of Procedure to identify any changes to Govan Brown Workplace Inspection Procedure; Document Control Register/Revision Page will reflect the review and update.

### **DAILY / PRE-USE INSPECTIONS**

Govan Brown has instituted a rigorous pre-use inspection protocol for vehicles, machines, tools, and equipment to ensure operational safety and efficiency.

Prior to utilization, workers are mandated to perform pre-use inspections to identify defects, hazards, and ensure proper functioning.

All pre-use inspection records, detailing identified issues and corrective measures, are carefully documented to maintain compliance with provincial acts and regulations (O. Reg 213/91/Alberta OHS/WorkSafe BC) as well as manufacturers' maintenance guidelines and to ensure operational safety and efficiency.

To ensure accountability and traceability, all pre-use inspection records are carefully maintained, whether electronically or physically, at the workplace location and/or head office. This careful record-keeping practice ensures accessibility, traceability, and compliance with regulatory requirements, facilitating a comprehensive history of the inspection process for future reference, audits, or compliance purposes.

- All tools, equipment, and vehicles will be visually inspected daily prior to use / every time prior to use by the user to verify that they are in proper working condition and is free from any defects or damage;

- All tools, equipment and vehicles standard warm-up, routine care / cleaning tasks & functional test will be performed daily prior to use / every time prior to use by the user to verify that they are in proper working condition and is free from any defects or damage;
- Operators of any equipment over 10 horsepower (heavy equipment, vehicles, forklifts, elevated work platforms, and suspended work platforms) complete daily pre-use inspections using designated checklists, documenting pertinent information such as operator information details, equipment identification, inspection date, areas examined and identified defects.
- Informal daily pre-start/pre-use checks and visual inspections must be completed for all other tools, machines and equipment.
- All overdue and/or defective tools, equipment, and vehicles will be reported to supervisor and red tagged out and removed from service for repair or disposal.
- Pre-start work area inspections and hazard assessments at project sites are conducted as required, adhering to established protocols by all involved parties.

**WEEKLY PLANNED INSPECTION**

- Performed weekly by Site Supervisor or Competent designate assigned by the Supervisor using the workplace inspection form.
- Any action required item will be dealt accordingly within reasonable time frame and immediate danger conditions will be corrected straight away without delay.
- Items that are identified during the inspection process that require attention are inputted on the appropriate documentation (equipment checklist, inspection form, etc.) and status of the closed items verified and validated.
- All overdue and/or defective tools, equipment, and vehicles will be red tagged out and removed from service to be repaired or discarded.
- Items that require attention beyond the inspector/Supervisors' control to correct shall be transferred to the corrective action sheet and reviewed by Senior Management to take action.
- After the Inspection form is completed; the form is to be filed at the project site.
- Inspection reports are to be posted and to remain available until the next inspection is posted.

**MONTHLY PLANNED INSPECTION**

The formal documented workplace inspection will be conducted by Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC)/Joint Occupational Health and Safety Committee (JOHSC) in accordance with Occupational Health & Safety Act and Regulations on a monthly basis (e.g., at the beginning of each month for the upcoming month).

Govan Brown will retain records accessible for Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC)/Joint Occupational Health and Safety Committee (JOHSC) review prior to conducting the monthly formal workplace inspection. These records review will include but not limited:

WSIB reports	Legislation and legal requirements
First aid reports	Emergency procedures
Personal protective equipment required	Inspection checklist
Building plan and Process & workflow patterns	Manufacturers specifications and problem indicators
Hazardous materials used	Previous inspection reports
Employer rules and standard operating procedures	Incidents reports

The range of things to inspect can vary, depending on the kind of activity undertaken by Govan Brown Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) conducting the inspection should be knowledgeable about the kinds of hazards that may be present and the legal requirements that apply as well as the requirements of the Govan Brown health and safety program.

Any health and safety deficiencies identified during the inspection should be noted and corrective action should be taken. Follow up to see that the corrective action has been taken and that the hazard has been effectively dealt with. Where inspections are being done by the Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC)/Joint Occupational Health and Safety Committee (JOHSC), the site supervisor should normally accompany them so that any corrective action needed can be implemented as soon as possible.

If the supervisor of the area does not accompany the inspection team, consult the supervisor before leaving the area. Discuss each recommendation with the supervisor. Report items that the supervisor can immediately correct.

Note these on the report as corrected. This documentation keeps the records clear and serves as a reminder to check the condition during the next inspection.

The results of the inspections should be effectively communicated to the appropriate supervisor(s) and a copy should be kept on file on site and also forwarded to the company's head office for review and retention.

### **REGULAR MONTHLY INSPECTIONS**

It is absolutely crucial that emergency response equipment (e.g., fire extinguishers, first aid kits etc.) maintained in proper working condition at all times to provide the best possible outcome in the event of fire, workplace injury, chemical spill or other emergency.

Through the regular monthly inspection protocol Govan Brown will ensure that competent person conducts regular inspection on emergency response equipment as required and in compliance with all local requirements and equipment is ready to function at a moment's notice.

Any deficiencies identified during the emergency response equipment inspection should be noted and corrective action should be taken immediately.

The results of the inspections should be effectively communicated to the appropriate supervisor(s) and a copy should be kept on file on site and also forwarded to the company's head office for review and retention.

### **PREVENTIVE MAINTENANCE ANNUAL INSPECTION**

Complete overhaul equipment inspection of tools, equipment and vehicles will be performed before first used & commencing work as per O. Reg. 213/91, s. 93;

Equipment performance monitoring and routine preventive maintenance service during its normal operations will be performed as per original equipment manufacturer (OEM) guidelines and recommendations;

Planned equipment preventive maintenance based on usage/mileage or time base intervals and regardless of its condition will be performed as per equipment inspection schedule;

Planned complete overhaul equipment preventive maintenance inspection will be completed at minimum annually or more frequently as recommended by original equipment manufacturer (OEM);

### **COMMUNICATION**

- Govan Brown Workplace Inspection Policy, Program and Procedures located in the Govan Brown health and safety binder and be posted in the workplace H&S safety Boards.
- Govan Brown's Workplace Inspection Policy, Program and Procedures will be communicated to all new Govan Brown workers, supervisors, and managers through new employee general orientation or site-specific induction and/ or through periodic management and staff safety meetings or toolbox talk meetings.
- All existing Govan Brown staff will receive orientation through the OHS Program / Occupational Health and Safety Management System (OHSMS) orientation and /or through Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC)/Joint Occupational Health and Safety Committee (JOHSC) communication and periodic management and staff safety meetings as well as through periodic and ongoing safety training, internal communication protocols or structured training sessions.
- This procedure will be made available at the point of use to workers, subcontractors and suppliers upon request.

### **TRAINING**

- All new managers, supervisors, and workers will receive training Govan Brown Workplace Inspection Policy, Program and Procedures during their on-boarding training upon hire.
- All new employees will receive awareness training as part of their orientation on their specific health and safety roles and responsibilities through the new hire orientation process.
- All existing employees will receive training on their health and safety roles and responsibilities through periodic staff OHS Program / Occupational Health and Safety Management System (OHSMS) orientation safety meetings as well as through periodic and ongoing safety training or structured training sessions.
- Verification of training will be confirmed via sign off and may include knowledge verification testing.

### **EVALUATION**

- This procedure will be reviewed on annual basis by Senior Management and /or during the annual OHS Program / Occupational Health and Safety Management System (OHSMS) internal audit and maybe changed due to business needs, any legal requirements and based on the results of the evaluation to ensure it continues to meet OHS regulation and standards and to ensure it is relevant with current operations and any changes will be indicated in the meetings minutes or reflected on the revision page.

- The Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC)/Joint Occupational Health and Safety Committee (JOHSC) and management will also be involved with the evaluation by analyzing forwarded items of concern and suggesting corrective action.
- On a yearly basis, management will review OHS Program / Occupational Health and Safety Management System (OHSMS) to assess whether it is still compliant with current regulations and with the current work environment. If necessary and if required procedure will be amended to reflect the current operation.
- After the year-end audit a thorough analysis of the gaps identified will be conducted by the Internal Auditor & Senior Management will develop an action plan that addresses the deficiencies with an overall goal of continual improvement.
- Senior Management at least annually or more often as required should review and validate company Document Control Master List with indication supporting documents needed to implement, monitor and maintain active OHS Program / Occupational Health and Safety Management System (OHSMS) effectively and assess conformance with business, corporate and legal requirements as well as compliance with applicable standards.
- Document Controller or Designee will coordinate and manage Document Control Register to ensure changes to, and current versions status of, documents are identified and tracked in order to prevent the unintended use of obsolete documents and identify such documents if they are retained for any purpose.

## **REFERENCES**

Occupational Health and Safety Act R.S.O. 1990

OHS Program / Occupational Health and Safety Management System (OHSMS)

Document Control Master List

Document Control Register

Job Hazard Analysis / Assessment (JHA)

Addendum: Subcontractor Safety Package

Inspection Schedule

Workplace Inspection Report

## **INCIDENT INVESTIGATION AND REPORTING POLICY STATEMENT**

Govan Brown Associates Limited senior management recognizes all workers' rights to work in a safe and healthy work environment and fully understands and supports the fundamental principles to prevent losses from workplace incidents occurrences through the provision of safe and healthy work environment.

In order to achieve this goal focusing on loss prevention, Govan Brown Associates Limited, defined and established effective policy and procedural framework to accurately report and investigate incidents, near misses, work refusals occurrences as well as workplace violence / harassment cases and in line with provincial acts and regulations.

Govan Brown Associates Limited requires all employees to immediately report all incidents that result in injury, first aid case or property damage, motor vehicle accidents, occupational illnesses, work refusals and all near misses with the potential for serious injury or property damage to their supervisor. Incident sites should not be disturbed unless the safety of workers is at risk and Supervisors will then report the incident promptly to management to ensure timely reporting, investigation and further submission to relevant regulatory bodies including, but not limited Ministry of Labour, Immigration, Training and Skills Development (MLITSD) or Workplace Safety and Insurance Board (WSIB)/ Workers Compensation Board of Alberta (WCB)/WorkSafeBC. Each incident that results in worker injury or has a potential for worker injury will be investigated and analyzed to determine root causes (underlying causes) and contributing factors and the analysis will be used to recommend corrective actions to eliminate the risk of future incidents and prevent re-occurrence.

Govan Brown Associates Limited requires that incidents are investigated and reported according to the injury, or potential injury event, in accordance with Govan Brown Associates Limited internal policy, procedural framework protocol and the Accident Notices and Reporting requirements prescribed under sections 51-53.1 and clauses 25(2) (n) and 25 (5) of the Occupational Health & Safety Act.

Govan Brown Associates Limited will implement and maintain documented corrective actions and lessons learnt outcomes from incidents which will be communicated to all personnel for follow-up. Implementation of action items will be monitored and reviewed on a quarterly basis by Govan Brown Associates Limited senior management to ensure that implemented corrective actions with improvements are effective and efficient and comply with or exceed jurisdictional requirements.

This policy applies to all Govan Brown Associates Limited workplace incidents and near misses (close calls) that affect our employees and others who are performing work for Govan Brown Associates Limited.

Govan Brown Associates Limited, as an employer, is ultimately responsible for worker health and safety. As president, I give you my personal commitment that I will comply with my duties under the Occupational Health and Safety Act, such as taking every reasonable precaution for the protection of workers in the workplace.



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Colin Gray

President – Govan Brown Associates Limited

March 22/24

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Date

## INCIDENT INVESTIGATION AND REPORTING PROGRAM & PROCEDURE

### PURPOSE

The Incident Investigation & Reporting Policy and Program has been developed to provide guidelines to all Govan Brown workplace parties and to ensure the legislative compliance for reporting workplace incidents, conducting adequate investigation, identification of all immediate/ basic root causes and elaboration of the corrective actions to be undertaken to prevent similar injuries and incidents in the future.

### SCOPE

The Incident Investigation & Reporting Policy and Procedures apply to all Govan Brown Managers, Supervisors, Health & Safety Representatives / JHSC / JOHSC members and all Workers and explain workplace parties' obligations under the Occupational Health and Safety Act (OHSA) and relevant regulations to report workplace injuries and illnesses and assign responsibilities to ensure all work-related injuries and incidents are investigated and root causes are identified to prevent future occurrences.

### DEFINITIONS

**Incident**- an event or combination of work-related events that result in time lost from work, medical aid/health care, property damage, fire or environmental release, as well as event(s) (including near misses) that had the potential to result in any of the above.

**Injury** - any physical or functional abnormality or loss which results from a workplace event or occupational disease/illness. Such injuries may result in lost time and/or a requirement for medical aid or first aid.

**Fatality** - an injury resulting in loss of human life

**Critical Injury** - 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.** For the purposes of the Act and Regulations "Critical injury" defined in the Ontario Regulation 420 / 21 – Notices and Reports under Sections 51 to 53.1 of the Act – Fatalities, Critical Injuries, Occupational Illnesses and Other Incidents.

**Near Miss** - an event that under different circumstances could have resulted in physical harm to an individual or serious damage to the environment, equipment, property or material.

**Fire/Explosion** - an event where undesired combustion occurs.

**First Aid** - is the emergency one-time treatment or care given immediately to an injured person and any follow-up visit(s) for observation purposes only. It includes 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.

**Medical Aid** - A work related injury or illness that requires treatment by a regulated health care provider but does not result in the injured worker missing time from work. The worker is able to return to full regular duties or modified duties for the next scheduled shift.

**Medical attention** - means treatment from a legally qualified medical practitioner or a registered nurse who holds an extended certificate of registration under the Nursing Act, 1991.

**Lost Time** - when a worker suffers a work-related injury/disease which results in one of the following: being off work past the day of accident, loss of wages/earnings or a permanent disability/impairment.

**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 and thereby includes an occupational disease for which a worker is entitled to benefits under the Workplace Safety and Insurance Act, 1997, S.O. 1997, c. 16, Sched. A.

**Structural hazard** – potential structural inadequacy with the workplace that may be dangerous or a hazard to workers. A structural inadequacy could be an issue with part of the workplace building or structure that may be faulty and/or unsafe due to:

- damage
- distress
- deterioration or instability of a roof, wall, beam, or support
- severe water tightness issues such as a failed waterproofing system

This could include the building or any other part of the workplace, whether temporary or permanent.

**Environmental Release** – an uncontrolled, unplanned, or accidental release, or release in contravention of regulations or interim orders of a substance into the environment or the reasonable likelihood of such a release into the environment.

**Workplace Violence** – means physical or psychological act or attempt to cause injury or abuse. Workplace violence also 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 behavior that is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker;

**\*Ref.** Govan Brown H&S program manual - Workplace Violence and Harassment section for more details.

**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. 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.** Govan Brown H&S program manual - Workplace Violence and Harassment section for more details.

**MLTSD** - Ministry of Labour, Training and Skills Development.

**WSIB** - Workplace Safety and Insurance Board.

**R.S.O.** - Revised Statutes of Ontario.

**R.R.O.** - Revised Regulations of Ontario.

**JHSC** - Joint Health & Safety Committee.

**JOHSC** - Joint Occupational Health and Safety Committee.

**HSR** - Health & Safety Representative;

**O.Reg** - Ontario Regulation.

**CEPA** - Canadian Environmental Protection Act;

**P.Eng.** - Professional engineer



## ROLES AND RESPONSIBILITIES

### SENIOR MANAGEMENT

- Establish and document policies and procedures for incident and accident investigation and reporting that align with legislative requirements.
- Provide comprehensive training to Supervisors, Joint Health & Safety Committee members, Health & Safety Representatives, and workers on incident investigation and reporting procedures, including legislative and organization-specific requirements.
- Ensure that all accidents and injuries and near misses, regardless of severity, are reported promptly and in accordance with the established policy and procedure.
- Promptly initiate incident reporting and investigation for incidents, ensuring compliance with legislative and organizational timeframes.
- Review submitted incident investigation reports, identify corrective actions to prevent reoccurrence, assign responsibilities, and verify their implementation.
- Document the follow-up actions taken, including who completed them, when they were completed, and assess the effectiveness of the corrective actions.
- Ensure that investigations are conducted by competent supervisors or a group of individuals experienced in incident causation models, investigative techniques, legal requirements, occupational health and safety fundamentals, work processes, mediation or conflict resolution methods, document and record management and data analysis.
- Conduct an annual review of the investigation and reporting procedures, identifying any necessary changes and developing action plans to address deficiencies.
- ***Specific to Province of Alberta:*** Ensure those employees that lead investigations participate in and receive training, such as Leadership for Safety Excellence etc.

### SUPERVISOR

- Initiate emergency protocols and notify emergency services as necessary in the event of a workplace incident.
- Provide prompt first aid treatment and record the details in the first aid report.
- Arrange for appropriate medical treatment for injured workers and ensure safe transportation to medical facilities.
- Assume control of the incident site until all preliminary evidence is collected.
- Notify the appropriate personnel promptly after an incident occurs.
- Conduct investigations following the outlined procedures, including collecting relevant records and examining equipment, materials, substances, or tools involved.
- Analyze evidence to determine the immediate and underlying causes, propose immediate corrective actions, and record them using company templates.
- Notify the Health and Safety Representative and Joint Health & Safety Committee to assist in the investigation, identify occupational health and safety deficiencies, root causes, and implement corrective and preventive actions.
- Inform the Health and Safety Coordinator/Administrator as soon as possible.
- Secure and manage the accident scene until the investigation is completed or permission is granted by MLTSD Inspector.
- Receive training on legislative and organization-specific reporting requirements and investigation procedures.
- ***Specific to Province of Alberta:*** Ensure they participate and receive training in conducting investigations, such as Leadership for Safety Excellence.

**HEALTH & SAFETY REPRESENTATIVE**

- Participate in investigations of workplace accidents and injuries and near misses, regardless of severity and collaborate with supervisors in employer incident investigation processes as required.
- Work with supervisors to conduct investigations and assist in completing the report, ensuring both parties sign the injury/incident investigation report.
- Elaborate and submit the report to the Manager, cooperatively reviewing and finalizing it by identifying contributing factors and proposing corrective actions.
- In the case of injuries, ensure that the injured worker receives appropriate medical attention and injury packages.
- Safeguard the privacy of employees regarding injury/incident information in their possession.
- Receive comprehensive training on legislative and organization-specific reporting requirements and investigation procedures

**DEDICATED FIRST AIDER**

- Administer appropriate first aid treatment upon being informed of an injured or ill worker.
- Complete a First Aid Report, documenting the provided treatment or advice.
- Assist in ensuring that injured or ill workers receive necessary medical attention.
- Provide a statement of witnessed events and cooperate in investigations, reporting incidents, injuries, or illnesses to their supervisor or manager.
- Receive training on legislative and organization-specific reporting requirements and investigation procedures

**WORKERS**

- Immediately report any injuries or occupational illnesses to their supervisor or manager.
- If an employee is unable to report due to the nature of the injury or illness, it is the responsibility of another worker who discovers the incapacitated worker to promptly report the event.
- Cooperate in investigations and report incidents, injuries, or illnesses to their supervisor or manager.
- Participate in completing the Injury or Illness Investigation report and implementing identified corrective actions.
- Collaborate in WSIB programs related to workplace injury and illness, as well as the claims process.
- Receive training on legislative and organization-specific reporting requirements and investigation procedures.

**CONTRACTOR/SUBCONTRACTOR**

- Immediately report any injuries or occupational illnesses to their supervisor or manager.
- Cooperate in investigations and report incidents, injuries, or illnesses to their supervisor or manager.
- Participate in completing the Injury or Illness Investigation report.
- Collaborate in WSIB programs related to workplace injury and illness, as well as the claims process.
- Ensure that incident investigations are completed within the established timeframe for serious incidents and in a timely manner for other listed incidents.
- Provide training to Contractor/Subcontractor employees on legislative and organization-specific reporting requirements and investigation procedures.
- Ensure that Contractor/Subcontractor Safety Representatives and/or Joint Health & Safety Representatives receive formal training for conducting comprehensive incident investigations.
- Review incident investigation reports submitted by the Contractor/Subcontractor and conduct a root cause analysis.
- Identify and implement recommended corrective actions, specifying the actions, responsible parties, and implementation timeline.
- Document the follow-up actions taken, including what has been done, who completed the actions, and evaluate the effectiveness of the corrective actions in preventing reoccurrence.

## **STANDARDS AND PROCEDURES**

Govan Brown is committed to complying with Occupational Health and Safety Act (OHSA) and other applicable health and safety legislation under the OHSA.

Govan Brown have established comprehensive standards and procedures for incident reporting and investigation and training, which include but not limited requirements and protocols listed below.

### **EDUCATION AND INTERNAL TRAINING FACILITATION**

Govan Brown recognize the importance of providing comprehensive training to ensure that all personnel involved in incident investigation and reporting are equipped with the necessary knowledge and skills.

All Supervisors, Joint Health & Safety Committee members, Health & Safety Representatives, and workers who are involved in incident investigation and reporting will receive training.

Training is provided to all relevant personnel on legislative and organization-specific reporting requirements and investigation procedures including individuals from various levels and roles within the organization.

Our training program encompasses legislative and organization-specific reporting requirements and procedures. The training will cover both legislative requirements, such as those outlined OHSA legislation, as well as Govan Brown 's specific reporting requirements and procedures. Participants will gain a thorough understanding of their responsibilities and obligations in incident reporting and investigation.

The training will cover key topics, including but not limited to:

- Reporting obligations, legislative and organization-specific reporting requirements and timelines for different types of incidents, including near misses
- Procedures for conducting thorough investigations
- Documentation requirements and the use of standardized forms
- Immediate and underlying root cause analysis techniques and determining OHS deficiencies
- Corrective and preventative actions and their implementation
- Communication of investigation results to Senior management and relevant parties

Incident reporting and investigation procedures will be also reviewed during the orientation process for new employees. Additionally, all employees will undergo health and safety orientation and annual safety training, during which incident reporting and investigation procedures will be reinforced and updated.

The training will be delivered through a combination of methods, such as presentations, interactive discussions, case studies, focus groups discussions and practical exercises. Training sessions may be conducted in person, online, or through a blended learning approach, depending on the availability and preferences of participants.

### **ADDITIONAL CONSEQUENCES MITIGATION AND PRESERVATION OF WRECKAGE**

In the event of an incident, Govan Brown is committed to taking immediate action to mitigate any additional consequences that may arise. Our priority is to ensure the safety and well-being of all individuals involved.

Following an incident, steps will be taken promptly to prevent any further harm or damage. This includes implementing measures to address immediate risks and hazards, such as securing the area, providing medical assistance, and ensuring the safety of individuals. These actions are crucial in minimizing the potential for additional consequences and maintaining a safe environment.

In cases where a person is killed or critically injured at a workplace, it is essential to preserve the wreckage and related items as they are integral to the investigation process. Unless authorized by MLTSD, no one shall interfere with, disturb, destroy, alter, or remove any wreckage, article, or thing at the scene, except under specific circumstances, including:

- Saving lives or relieving human suffering
- Maintaining essential public utility services or public transportation systems
- Preventing unnecessary damage to equipment or other property

Prior to any interference, disturbance, alteration, or removal of wreckage or related items, permission must be obtained from MLTSD. This ensures that the integrity of the scene is maintained, and crucial evidence and information can be accurately assessed during the investigation.

Govan Brown is committed to adhering to all regulatory requirements, including those related to the preservation of wreckage. Our personnel will follow the established procedures and seek appropriate permissions as required by the applicable legislation

## **INCIDENT INVESTIGATION OUTCOMES**

Incident investigations are essential in identifying occupational health and safety (OHS) deficiencies and determining the immediate and root causes of incidents. Govan Brown is committed to conducting thorough investigations and implementing appropriate corrective and preventative actions to prevent future incidents.

Govan Brown approach in determining OHS deficiencies, implementing corrective and preventative actions, and communicating investigation results to all relevant parties is based but not limited the following processes:

### **Determining OHS Deficiencies, Immediate and Underlying Root causes**

- Analyzing various factors, including people, equipment, materials, environment, and processes, to understand the circumstances leading to the incident.
- Utilizing experienced investigators who possess knowledge of incident causation models, investigative techniques, and OHS fundamentals.
- Reviewing relevant documents, records, and data to gather comprehensive information.
- Applying effective interview techniques and interpersonal skills to gather witness statements and insights.
- Analyzing the collected data to identify the immediate causes and underlying root causes of the incident.

### **Determining and Implementing Corrective and Preventative Actions**

- Developing appropriate corrective and preventative measures and/or action plan based on the investigation findings.
- Assigning responsibilities for implementing the corrective and preventative actions to ensure accountability.
- Implementing measures such as process improvements, equipment modifications, enhanced training programs, and revised work procedures.
- Regularly monitoring the progress of the implemented actions and ensuring their effectiveness.
- Adjusting the actions, if necessary, to continuously improve safety and prevent similar incidents in the future.

### **Communicating Investigation Results**

- Compiling a comprehensive report that outlines the identified deficiencies, immediate and root causes, and recommended corrective and preventative actions.
- Communicating the investigation report and outcomes to all relevant parties, including management, supervisors, Joint Health & Safety Committee members, workers, and external parties as necessary including authorities, regulators, or the Ministry of Labour, depending on the nature and severity of the incident.
- Govan Brown will ensure compliance with these reporting obligations, and the reports will be reviewed as necessary to fulfill regulatory requirements. Where required by OHS legislation, written reports meeting the requirements under Section 51, 52, and 53 and clause 25(2)(n) of the OHSA, including prescribed incidents, will be prepared and sent to the Ministry of Labour within the required timeframe.
- Conducting meetings, safety bulletins, training sessions, or utilizing digital platforms to disseminate the investigation results and lessons learned outcomes.
- Encouraging open dialogue and feedback from stakeholders to enhance understanding and foster a culture of safety awareness.

### **Corrective Actions and Preventative Actions (CAPA) evaluation**

- Regularly assessing the progress and outcomes of the implemented actions.
- Soliciting feedback from workers, supervisors, and the Joint Health & Safety Committee regarding the effectiveness of the measures.
- Considering suggestions and recommendations for further improvement.
- Making necessary adjustments to the actions to address any identified shortcomings or changing circumstances.
- Monitoring and reviewing the overall impact of the implemented actions to enhance workplace safety and prevent incidents.
- Utilize performance indicators and specific metrics to measure the effectiveness of implemented actions (e.g., incident rates, near-miss reports, worker feedback, compliance with safety procedures).
- Conduct regular workplace inspections and audits with implement a system of scheduled inspections and audits to assess workplace adherence to corrective and preventative actions.
- Analyze incident trends and statistics to identify recurring issues or patterns through the analysis of incident trends to refine measures and address emerging risks.
- Continuously review incident data and reports to identify areas for improvement and potential concerns.
- Foster continuous improvement and encourage a culture of continuous improvement by actively seeking feedback from workers, supervisors, and the Joint Health & Safety Committee.

- Conduct management reviews and regularly evaluate the overall effectiveness of implemented actions through comprehensive management reviews of safety systems, incident investigation procedures, training programs, and the efficacy of corrective and preventative measures.

**FORMS AND RECORDS**

Govan Brown has developed specific forms for incident investigations, including investigation report forms and witness statement forms. These standardized forms streamline the documentation process and ensure consistent and thorough recording of incidents and investigations, enabling a comprehensive analysis of the incident and its causes.

The utilization of standardized investigation forms and careful maintenance of incident investigation records are integral parts of Govan Brown's commitment to fostering a proactive safety culture. These practices enable the organization to identify trends, assess the effectiveness of implemented actions, and continuously enhance safety measures.

Govan Brown is committed to maintaining records of all incident reporting, investigation results, and their supporting documentation. Electronic storage methods involve utilizing secure document management systems equipped with access controls and regular backups to safeguard against data loss or corruption. Simultaneously, physical records are diligently organized and stored in locked filing cabinets at designated workplace locations or head office facilities.

All company incident reporting and investigation records, including support documentation, meeting minutes, training /meeting attendance sheets, documented implemented corrective actions, safety talk records, hazard assessment training documentation and related responses, are carefully maintained in a secure and accessible manner and stored in electronic database and/or scanned physical files at the head office. This ensures accessibility, traceability, and compliance with regulatory requirements regarding incident reporting and investigation documentation and ensures a comprehensive history of our incident reporting and investigation process for evaluation, monitoring, future reference, audits, or compliance purposes.

Furthermore, all incident reporting and investigation records are retained for a minimum of three years from the date of closure, as mandated by regulatory requirements. This retention period ensures that historical data related to incidents and investigations are preserved for future reference, analysis, and compliance purposes.

By employing both electronic and physical storage methods, Govan Brown ensures redundancy and accessibility to records, facilitating efficient retrieval and analysis when needed.

**BASIC INCIDENT INVESTIGATION PROCEDURE**

The following are basic procedures to be followed in the event of a workplace incident/accident/ or notification of an unsafe condition.

1. Ensure first aid is administered if required/possible and it is safe to do so.
2. Arrange for injured workers to be taken to a medical clinic or hospital, depending on the severity, as necessary.
  - Follow the appropriate steps listed for Incidents/Accidents procedure involving Govan Brown employees and Govan Brown Subcontractors
3. Secure the accident scene and ensure that it is not disturbed.
4. Report the incident occurrence to supervisor and designated person within the organization.
5. Initiate the investigation (if authorized by the Management Team and when required by the MLTSD) by following these steps:
  - Manage and assess the scene to ensure it is safe for investigators.
  - Manage witnesses, provide support, and limit interaction with other witnesses during interviews.
  - Collect data, facts, and findings related to the incident.
  - Identify contributing factors, such as people, equipment, materials, environment, and processes.
  - Analyze the data to determine the immediate and underlying root causes.
  - Report the findings and recommendations, including identified occupational health and safety deficiencies and root causes of the incident, and determine further implementation of corrective and preventative actions.
6. Provide all the investigation and reporting forms, witness statements, and other supporting information to the Health and Safety Coordinator and Management for review and distribution.
  - Never distribute information to others without permission from the Management Team

Management must review the documentation prior to distribution, ensuring that recommendations for corrective actions address the identified immediate and root causes and verify the effectiveness of corrective actions in controlling hazards.

Refer to following section to obtain more specific guidelines and information:

- Ministry of Labour, Training and Skills Development - Reportable Incidents/ Accidents
- Incidents/Accidents procedures and reports - Govan Brown Employees
- Incidents/Accidents procedures and reports - Govan Brown Subcontractors
- Work Refusal

Management will ensure that corrective and preventative actions are communicated to all relevant parties as determined in the Incident Investigation Report. All Incident Investigation Reports and supporting documentation will be maintained on file by Govan Brown Records of incidents will be kept on file for at least three years from the date of closure.

## **INCIDENTS INVOLVING GOVAN BROWN EMPLOYEES**

When any of Govan Brown employees sustains a workplace injury, follow the procedures listed below:

### **SUPERVISOR:**

- Ensure first aid is administered if required/possible and it is safe to do so.
- Make arrangements for transportation to a Medical Clinic or Hospital (whichever is appropriate).
- Secure the accident scene (based on the circumstance take the necessary precautions for the safety of the injured worker and/or others).
- Obtain the Return to Work Package and follow the instructions for sending a worker for medical treatment (explain the process to the injured worker and obtain a signed copy of the WSIB Worker Consent Form/ Modified Work Job Tasks offer Letter).
- Immediately notify Management.
- Take names and phone numbers of any and all persons who witnessed or may have knowledge of the accident (statements will need to be taken during the investigation).
- Conduct an Investigation using the Accident/Incident Investigation Report Form (when granted permission from Management and the Ministry of Labour where applicable). Investigate the incidents with a focus on determining underlying/basic causes, as well as root causation.
- Ensure corrective measures are implemented prior to allowing work to continue.
- Maintain contact with the injured worker and assist in the Early Safe Return to Work program for the injured worker when applicable.

### **MANAGEMENT:**

- Will ensure that Health and Safety Coordinator has been informed of the accident.
- Will provide assistance with the investigation in the event of a Critical Injury, seek Legal Counsel (if required) and communicate with the MLTSD (if required).
- Review the accident investigation report(s) and any Notices to be sent to the MLTSD/ WCB/ OHS as applicable.
- Take appropriate measures to implement corrective measures.
- Will ensure that investigation reports are received by the Health and Safety Coordinator and reports are sent to WSIB as required (within 3 Days of the worker receiving treatment from a health care professional for a workplace related injury or illness).
- Where required make arrangements and assist in the Early, Safe Return to Work.

In case of Critical Injury Incidents take all steps listed above and furthermore ensure the following;

- Notification to Ministry of Labour, Training, Skills and Development (MLTSD), workplace joint health and safety committee or health and safety representative and the union immediately.
- Prepare written notices to the MLTSD with the assistance of Health and Safety Coordinator /Administrator where required and review with Management prior to delivery.
- Cooperate with the Ministry of Labour, Training, Skills and Development (MLTSD) during their investigation.

**INCIDENTS INVOLVING GOVAN BROWN SUBCONTRACTORS**

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

**SUPERVISOR**

- Ensure first aid is administered if required/possible and it is safe to do so.
- Make arrangements for transportation to a Medical Clinic or Hospital (whichever is appropriate).
- Secure the accident scene (based on the circumstance take the necessary precautions for the safety of the injured worker and/or others).
- Immediately notify Management.
- Take names and phone numbers of any and all persons who witnessed or may have knowledge of the accident (statements will need to be taken during the investigation).
- Conduct an Investigation using the Accident/Incident Investigation Report Form (when granted permission from Management and the MLTSD where applicable). Investigate the incidents with a focus on determining underlying/basic causes, as well as root causation. Furthermore, when applicable insist that the subcontractor provides appropriate notification to the provincial governing authorities such as the MLTSD/Workplace Safety and Insurance Board (WSIB)/WCB/OHS/WorkSafeBC and provide Govan Brown copies of notices.
- Request that the contractor investigates the matter and provides a copy of the investigation report, photographs and statements to Govan Brown.
- Only allow the subcontractor to continue with the work if acceptable measures have been taken to prevent a recurrence.

**MANAGEMENT**

- Will ensure that Health and Safety Coordinator has been informed of the accident.
- Will provide assistance with the investigation in the event of a Critical Injury, seek Legal Counsel (if required) and communicate with the Ministry of Labour, Training and Skills Development (if required).
- Assist the Supervisor / Foreman in the event of a MLTSD reportable incident/accident and obtain copies of any orders or charges given to the subcontractor(s) and Govan Brown.
- Review the accident investigation report(s) and any Notices to be sent to the Ministry of Labour.
- Take appropriate measures to implement corrective measures.
- Ensure updates and reports are provided to Senior Management.

In case of Critical Injury Incidents take all steps listed above and furthermore ensure the following;

- Notification to Ministry of Labour, Training and Skills Development (MLTSD), workplace Joint Health and Safety committee or Health and Safety representative and the Union immediately.
- Prepare written reports/notices to the MLTSD with the assistance of Health and Safety Coordinator where required and review with Management prior to delivery.
- Cooperate with the Ministry of Labour, Training and Skills Development (MLTSD) during their investigation process.

**CONTRACTOR/SUBCONTRACTOR**

- The Subcontractor, and its Subcontractors, workers, visitors, or suppliers must immediately report all near misses, incidents, accidents or unsafe conditions to the Site Supervisor.
- The Subcontractor and its Subcontractors must participate in investigating all near misses, incidents, accidents, unsafe conditions, or unsafe acts as requested by the Govan Brown Site Supervisor to ensure adequate controls are implemented.
- The Subcontractor shall conduct a full investigation for any Incident. Identify events and causes; provide information pertaining to the occurrence, recommendations, and steps to be taken to prevent a recurrence.
- The Subcontractor shall provide all reports and written notices, in accordance with the Occupational Health and Safety Act and pertinent regulations, the Workplace Safety and Insurance Act and these guidelines, within the notification period stipulated by the respective Authority. All reports must be copied to Govan Brown Site Supervisor and the Construction Manager.
- If a claim is made by a Subcontractor or its Subcontractors, workers, visitors or suppliers against another Subcontractor, Govan Brown or the Client, Govan Brown must receive notice of such a claim in writing, within one (1) day (24 hours) of the alleged occurrence on which the claim is based.

## REFUSAL TO WORK

**DEFINITION:** Where a worker has reasonable cause to believe that;

- a) the use or operation of a machine, or other thing would constitute an imminent danger to the safety or health of himself/herself or another employee, or that;
- b) a condition in any place that would constitute an imminent danger to his or her own safety or health;

That person may refuse to use or operate the machine device or other thing, or to work in that place.

### Steps to be taken

- 1) Worker refuses to work and immediately notifies employer or supervisor of the reasons.
- 2) Supervisor/Foreman investigates, in the presence of the worker and Joint Health and Safety Committee worker representative. Notify the Management Team.
- 3) Worker stands in a safe place near workstation while all attempts are made to resolve the perceived problem to the satisfaction of all parties.
- 4) If problem is resolved to the workers' satisfaction, he/she returns to work.
- 5) If not resolved and worker continues to refuse work, notify the MLTSD.

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

- 6) A Ministry of Labour, Training and Skills Development (MLTSD) Inspector investigates the refusal in the presence of the worker, employer and the worker representative of the JHSC/JOHSC.
- 7) Pending the outcome of the investigation, the worker may stand by or be assigned other work. The worker may NOT be sent home or disciplined for his/her actions.
- 8) A decision will be made in writing and provided to all parties. This decision must be adhered to whether in favor of the worker or employer.
- 9) An Investigation report must be completed by the supervisor or contractor employing the worker refusing work and the worker representative present during the investigation. This report must be provided to the Management Team and the JHSC/JOHSC.

All attempts should be made to resolve the problem through the Internal Responsibility System before it requires MLTSD involvement.

## MOTOR VEHICLE ACCIDENT

The following shall take place when a vehicle accident occurs at Govan Brown workplace:

- Control the scene and prevent further injury or damage to anyone involved.
- Notify supervisor / manager immediately and they will notify the appropriate personnel.
- Call police (provincial or local, depending on where the collision takes place). By law, you must report any collision to the police when there are injuries or damage to vehicles or property exceeding \$2,000.
- Take pictures of the scene, where appropriate.
- Contact your insurance company as soon as possible if you intend to make a claim.
- The operator shall complete Accident Report, attach any other pertinent reports, and hand it in to your Supervisor /Manager by the end of the shift.
- The Supervisor shall submit the report to the Manager by the end of the shift for further actions.

## NOTIFICATIONS & REPORTING REQUIREMENTS

Govan Brown workplace and operations covered by the Occupational Health and Safety Act (OHSA) and company may need to notify the Ministry of Labour, Training and Skills Development (MLTSD), workplace Joint Health and Safety Committee or Health and Safety Representative, and the Union (if there is one) when:

- a worker is killed or critically injured from any cause at a workplace as described in 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;
- 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 Workplace Safety and Insurance Board by or on behalf of the worker as described in subsection 52 (2) of the Act;



- the employer does not own the workplace and the Joint Health and Safety Committee or Health and Safety Representative, if any, has identified potential structural inadequacies of a building, structure, or any part thereof, or any other part of a workplace, whether temporary or permanent, as a source of danger or hazard to workers;

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.

**\*Ref.** R.S.O. 1990, c.O.1, s.51-53; R.S.O. 1990, c.O.1, s.25(2)(n) & 25(5); 2017, c. 34, Sched. 30, s. 1(1) & 1(2); Ontario Regulation 420 / 21;

**NOTICE OF CRITICAL INJURY/FATALITY**

Employer must notify the MLTSD, immediately of the occurrence by telephone or other direct means and send to a written report of the circumstances of the occurrence containing such information and particulars as the regulations prescribe when a person is killed or critically injured from any cause at a workplace.

Requirement to send a written report or to give written notice to a Director may be satisfied by submitting a form on a website of the Government of Ontario;

Requirement to send a written report or to give written notice to the committee, the health and safety representative and the trade union, if any, may be satisfied by providing the committee, the health and safety representative and the trade union with an electronic copy of the form referred above.

These requirements do not apply when a worker is killed, critically injured, disabled from performing his or her usual work or requires medical attention as a result of a collision involving a motor vehicle that occurs on a highway, as defined under the Highway Traffic Act, or on the private toll highway known as Highway 407, unless,

- (a) the worker affected was working at a project; or
- (b) the worker affected was not travelling in the motor vehicle at the time of the collision.

**\*Ref.** R.S.O. 1990, c.O.1, s.51 (1); 2011, c.1, Sched.7, s.2 (7); Ontario Regulation 420 / 21;

**Preservation of wreckage**

Where a person is killed or is critically injured at a workplace, no person shall, except for the purpose of,

- a) saving life or relieving human suffering;
- b) maintaining an essential public utility service or a public transportation system; or
- c) preventing unnecessary damage to equipment or other property,

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

**\*Ref.** R.S.O. 1990, c. O.1, s. 51 (2).

**General notification procedure:**

- 1) Call 911 in an emergency. Get first aid (if needed).
- 2) Call 1-877-202-0008 to report the incident to the MLTSD Health and Safety Contact Centre. You can make a report to this number at any time of day.
- 3) Call or tell the Joint Health and Safety Committee or Health and Safety representative and the Union (if there is one), about the incident.
- 4) Mail / fax faxed within forty-eight hours after the occurrence a written report of the circumstances of the occurrence containing such information and particulars as the regulations prescribe to the MLTSD regional office closest to the workplace where the incident happened or alternatively submit a form on a website of the Government of Ontario.
- 5) Provide the Joint Health and Safety Committee or Health and Safety representative and the Union (if there is one) with an electronic copy of the form submitted to MLTSD.

The written report of the circumstances of the occurrence containing such information and particulars as the regulations prescribe should:

- Be addressed to "Attention: Director";
- Be mailed, faxed within forty-eight hours after the occurrence to the MLTSD regional office closest to the workplace where the incident happened or alternatively submit a form on a website of the Government of Ontario.

The written report of the circumstances of the occurrence should include:

- the name, address and type of business of the employer;
- the name and address of the constructor if the occurrence is at a project;
- the name and the address of the worker who was is killed or critically injured from any cause at a workplace;
- the nature of the bodily injury or occupational illness;
- 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;
- 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;
- the names and addresses or other contact information of any witnesses to the occurrence;
- the steps taken to prevent a recurrence or further illness;

**\*Ref.** R.S.O. 1990, c.O.1, s.51 (1); 2011, c.1, Sched.7, s.2 (7); Ontario Regulation 420 / 21.

**NOTICE OF ACCIDENT, EXPLOSION, FIRE OR VIOLENCE CAUSING INJURY**

If a person 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, the employer shall give written notice of the occurrence within four days of the occurrence to the following:

- Joint Health and Safety Committee or Health and Safety representative and the Union (if there is one)
- Director at the MLTSD, if an inspector requires notification of the Director

Requirement to send a written report or to give written notice to a Director may be satisfied by submitting a form on a website of the Government of Ontario;

Requirement to send a written report or to give written notice to the committee, the health and safety representative and the trade union, if any, may be satisfied by providing the committee, the health and safety representative and the trade union with an electronic copy of the form referred above.

**\*Ref.** R.S.O. 1990, c.O.1, s. 52.1; 2001, c.9, Sched. I, s.3(12); 2009, c.23, s.5.; Ontario Regulation 420 / 21;

**General notification procedure:**

Prepare and deliver to the JHSC/JOHSC, the Health and Safety Representative and the Union (if any) a written notice of the occurrence containing the prescribed information and particular within 4 days of the incident if no person died or was critically injured because of that occurrence.

If requested by MLTSD inspector, mail / fax a written notice of the occurrence containing the prescribed information and particulars to the MLTSD regional office closest to the workplace where the incident happened or alternatively submit a form on a website of the Government of Ontario.

The written notice of the occurrence should include:

- the name, address and type of business of the employer;
- the name and address of the constructor if the occurrence is at a project;
- the name and the address of the worker who is disabled from performing his or her usual work or requires medical attention, but not died or critically injured because of that occurrence;
- the nature of the bodily injury or occupational illness;
- 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;
- 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;
- the names and addresses or other contact information of any witnesses to the occurrence;
- the steps taken to prevent a recurrence or further illness;

**\*Ref.** R.S.O. 1990, c.O.1, s. 52.1; 2001, c.9, Sched. I, s.3(12); 2009, c.23, s.5.; Ontario Regulation 420 / 21

**NOTICE OF OCCUPATIONAL ILLNESS**

If the employer is advised by or on behalf of a worker (current or former) 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, Employer must provide a written notice within four days of being so advised to:

- Director at the MLTSD
- Joint Health and Safety Committee or Health and Safety representative and the Union (if there is one)

Requirement to send a written report or to give written notice to a Director may be satisfied by submitting a form on a website of the Government of Ontario;

Requirement to send a written report or to give written notice to the committee, the health and safety representative and the trade union, if any, may be satisfied by providing the committee, the health and safety representative and the trade union with an electronic copy of the form referred above.

**\*Ref.** R.S.O. 1990, c.O.1, s.52(2) and 52; 1997, c.16, s.2(12) and R.S.O. 1990, c.O.1, s.52(3); 1997, c.16, s.2(13); Ontario Regulation 420 / 21;

**General notification procedure:**

Prepare and mail / fax within four days of being so advised a written report or written notice containing the prescribed information and particulars to the MLTSD regional office closest to the workplace where the incident happened or alternatively submit a form on a website of the Government of Ontario.

Provide the Joint Health and Safety Committee or Health and Safety representative and the Union (if there is one) with an electronic copy of the form submitted to MLTSD.

The written notice should:

- Be addressed to “Attention: Director”;
- Be mailed, faxed to the MLTSD regional office closest to the workplace where the incident happened or alternatively submit a form on a website of the Government of Ontario.

The written notice should include:

- the name, address and type of business of the employer;
- the name and address of the constructor if the occurrence is at a project;
- the name and the address of the worker who 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 nature of the bodily injury or occupational illness;
- 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;
- 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;
- a description of the cause or suspected cause of the occupational illness.
- the names and addresses or other contact information of any witnesses to the occurrence;
- the steps taken to prevent a recurrence or further illness;

**\*Ref.** R.S.O. 1990, c.O.1, s.52(2); 1997, c.16, s.2(12) and R.S.O. 1990, c.O.1, s.52(3); 1997, c.16, s.2(13); Ontario Regulation 420 / 21;

**NOTICE OF AN INCIDENT AT PROJECT SITE / PRESCRIBED LOCATION**

Constructor of the project or the person prescribed for the location if the incident occurs at a prescribed location shall within two days after the occurrence, give notice in writing with the prescribed information and particulars if:

- an accident, premature or unexpected explosion, fire, flood or inrush of water, cave-in, subsidence or rockburst occurs at a project site, mine or mining plant as described in subsection 53 (1) of the Act
- 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
- the following incidents are prescribed as incidents where notice must be provided under subsection 53 (1) of the Act and where Ontario Regulation 213/91 (Construction Projects) made under the Act applies:
  - i. a worker falls a vertical distance of three metres or more,
  - ii. a worker falls and the fall is arrested by a fall arrest system other than a fall restricting system,
  - iii. a worker becomes unconscious for any reason,
  - iv. there is accidental contact by a worker or by a worker's tool or equipment with energized electrical equipment, installations or conductors,
  - v. 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,
  - vi. there is a 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,
  - vii. there is a structural failure of a principal supporting member, including a column, beam, wall or truss, of a structure,
  - viii. there is a failure of all or part of the structural supports of a scaffold,
  - ix. there is a structural failure of all or part of an earth- or water-retaining structure, including a failure of the temporary or permanent supports for a shaft, tunnel, caisson, cofferdam or trench,
  - x. 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
  - xi. there is an overturning or a structural failure of all or part of a crane or similar hoisting device.

Written notice with the prescribed information and particulars should be given within two days after the occurrence to:

- Joint Health and Safety Committee or Health and Safety representative and the Union (if there is one)
- Director at the MLTSD, unless a report under section 51 or a notice under section 52 has already been given to a Director.

Requirement to send a written report or to give written notice to a Director may be satisfied by submitting a form on a website of the Government of Ontario;

Requirement to send a written report or to give written notice to the committee, the health and safety representative and the trade union, if any, may be satisfied by providing the committee, the health and safety representative and the trade union with an electronic copy of the form referred above.

**\*Ref.** R.S.O. 1990, c.O.1, s.53 (1), 53 (2) and 53.1; 2011, c.1, Sched.7, s.2 (8); 2017, c. 34, Sched. 30, s. 2 (1); 2017, c. 34, Sched. 30, s. 2 (2); 2017, c. 34, Sched. 30, s. 3; Ontario Regulation 420 / 21;

**General notification procedure:**

- 1) Call 911 in an emergency. Get first aid (if needed).
- 2) Call 1-877-202-0008 to report the incident to the MLTSD Health and Safety Contact Centre. You can make a report to this number at any time of day.
- 3) Call or tell the Joint Health and Safety Committee or Health and Safety representative and the Union (if there is one), about the incident.
- 4) If written report under section 51 or a written notice under section 52 have not already been given to a Director, mail / fax within two days after the occurrence a written notice with the prescribed information and particulars as the regulations prescribe to the MLTSD regional office closest to the workplace where the incident happened or alternatively submit a form on a website of the Government of Ontario.
- 5) Provide the Joint Health and Safety Committee or Health and Safety representative and the Union (if there is one) with an electronic copy of the form submitted to MLTSD.

The written notice should:

- Be addressed to “Attention: Director”;
- Be mailed, faxed within two days after the occurrence to the MLTSD regional office closest to the workplace where the incident happened or alternatively submit a form on a website of the Government of Ontario.

The written notice should include:

- the name, address and type of business of the employer;
- the name and address of the constructor if the occurrence is at a project;
- 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 or further illness;

**\*Ref.** R.S.O. 1990, c.O.1, s.53 (1), 53 92) and 53.1 with amendments: 2011, c.1, Sched.7, s.2 (8); 2017, c. 34, Sched. 30, s. 2 (1); 2017, c. 34, Sched. 30, s. 2 (2); 2017, c. 34, Sched. 30, s. 3; Ontario Regulation 420 / 21;

**PROFESSIONAL ENGINEER’S WRITTEN OPINION**

A 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 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:

- 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;

The professional engineer’s written opinion shall be provided within 14 days after the occurrence as supplement the report or notice.

**\*Ref.** R.S.O. 1990, c.O.1, s.53.1; 2017, c. 34, Sched. 30, s. 3; Ontario Regulation 420 / 21

**NOTICE OF A STRUCTURAL HAZARD**

Employer shall notify MLTSD, when the employer does not own the workplace and the JHSC/JOHSC or Health and Safety Representative, if any, has identified potential structural inadequacies of a building, structure, or any part thereof, or any other part of a workplace, whether temporary or permanent, as a source of danger or hazard to workers.

**NOTE:** This requirement is in clause 25(2)(n) of the Occupational Health and Safety Act and must be read with subsection 25(5) of the Occupational Health and Safety Act as it does not apply to an employer that owns the workplace 2017, c. 34, Sched. 30, s. 1 (2).

**\*Ref.** R.S.O. 1990, c.O.1, s.25(2) (n) & 25(5); 2017, c. 34, Sched. 30, s. 1(1) & 1(2).

**General notification procedure:**

Provide a written notice to the Ministry of Labour, Training and Skills Development.

The written notice should:

- Be addressed to "Attention: Director"
- Be mailed or faxed to the MLTSD regional office closest to the workplace where the incident happened or alternatively submit a form on a website of the Government of Ontario.

**ADDITIONAL NOTICES:**

In addition to the notice requirements set out in sections 51, 52 and 53, the regulations may specify additional notice requirements that must be met in the circumstances described in above sections, including specifying who is required to provide the notice, the timeframe in which it shall be provided and the information and particulars it must contain.

**\*Ref.** R.S.O. 1990, c.O.1, s.53.1; 2017, c. 34, Sched. 30, s. 3

**NOTICE OF ENVIRONMENTAL RELEASE**

**Public Reporting of Pollution**

Report pollution either online or by phone immediately if you witness any of the following:

- pollution spilled on land, in the water or air
- industrial or commercial noise pollution
- waste being dumped into the natural environment
- improper disposal of commercial waste

**Report pollution online**

In Ontario province submit online form through [www.report-pollution.ene.gov.on.ca](http://www.report-pollution.ene.gov.on.ca) where you can also upload a photo, audio file, or video up to 20MB in size to your report.

When you submit online report, you will be asked to provide basic contact information and information about:

- when the pollution event happened (date and time)
- where the pollution event happened
- the source of the pollution, such as a factory or construction site
- issue being reported, for example illegal waste dumping, improper pesticides uses and air or water pollution
- the weather conditions at the time when the incident occurred (if known)
- the intensity of the wind
- effect of the pollution, for example a sooty film left on your property

After you submit your report, staff at the Spills Action Centre will review it and they will send your report to the appropriate district or area office for follow up.

Personal information will be collected and may be used to assist with the proper administration of the Acts and regulations administered by the Ministry of the Environment, Conservation and Parks.

Personal information may be used to assist with responding to your report and may be shared with partner ministries and federal departments for that purpose.

The ministry may use your personal information, such as your email address or telephone number, to contact you for clarification or further information.

**Report pollution by telephone**

If you don't want to report the pollution incident online, or if the incident is an emergency, you can call our public reporting hotline toll-free, 24 hours a day, 7 days a week at 1-866-MOE-TIPS (663-8477).

During your call, an Environmental Officer will collect and assess your information before deciding on an appropriate response.

You will be asked for:

- date and time of the incident
- source and/or location of the incident
- current status of the incident
- type of pollutant involved
- what impact the pollutant is having on the environment
- weather conditions (for example, precipitation, temperature, wind direction, etc.)

**Regulatory spill reporting for owners of pollutants:**

Owners of pollutants are required by provincial law to report spills if:

- you allowed the spill to occur
- you had control of the substance immediately before the spill occurred
- you are a member of a public agency (such as Metrolinx) and to your knowledge the spill has not already been reported

Owners of pollutants reporting spills are required to contact the Spills Action Centre 24 hours a day, 7 days a week by telephone:

**416-325-3000**

**Toll-free: 1-800-268-6060**

**TTY: 1-855-889-5775**

In addition to contacting Ontario's Spills Action Centre, the spill must also be immediately reported to:

- the local municipality
- the owner of the substance (if known)
- the person in control of the substance (if known)

When reporting the spill, the owner of the pollutant will be asked to provide:

- their name and phone number
- name and phone number of the person or company in control of the product spilled
- date, time and location of the spill
- duration of the spill (if known) and whether the spill is ongoing
- type and quantity of pollutant spilled, including hazard level or toxicity information
- source of the spill and information on the cause
- description of adverse effects
- environmental conditions that affect the spill (weather, traffic, etc.)
- actions being taken to respond
- other agencies and parties responding

After the owner of the pollutant reports the spill, an environmental officer will:

- document the information and actions taken
- assess the environmental and health impacts based on gathered information
- ensure responsible parties respond to spill events as per their legislative responsibility
- track and follow up on required cleanup activities
- provide advice and information related to spills or environmental incidents
- coordinate a response with other agencies, if needed
- initiate government response when required

**\*Ref.** O.Reg.675/98; Environmental Protection Act, R.S.O. 1990, c. E.19

**REPORTING OF ENVIRONMENTAL EMERGENCIES UNDER SECTION 201 OF CEPA 1999**

Section 201 of CEPA 1999 requires that, when an environmental emergency occurs for any of the substances on the list established on Schedule 1 under the Environmental Emergency Regulations, any person who owns or has the charge, management or control of the substance immediately before the emergency shall, as soon as possible, notify an enforcement officer or any other person designated pursuant to the Regulations.

In addition, this person must abide by a number of other requirements, such as taking all reasonable measures consistent with protection of the environment and public safety and providing a written report.

The above obligations also apply to a person who causes or contributes to the emergency.

Schedule 1 of the Regulations includes 249 substances that pose an acute hazard to the environment or to human health should an accidental release occur. There are six hazard categories covered under the final regulations:

- aquatically toxic
- combustible
- explosion hazard
- pool fire hazard
- inhalation hazard
- oxidizer that may explode

For the purposes of section 201 of CEPA 1999 and Environmental Emergency Regulations, 2019 (SOR/2019-51):

- a verbal notification is to be made as soon as possible under the circumstances to the authorities identified in the Release and Environmental Emergency Notification Regulations (Notification Regulations) under CEPA 1999, which provide the regulated community and the public with the telephone number of the 24-hour authorities operating for the respective province or territory to which notifications are to be made; and
- a written report should be made as soon as possible under the circumstances to the relevant authorities

The person who is designated to be provided with a written report respecting the occurrence of an environmental emergency involving a substance that is on the list is the Regional Director, Environmental Enforcement Directorate, Enforcement Branch, Department of the Environment, in the region where the environmental emergency occurs.

**Notification and reporting of environmental emergencies contacts**

Province	Verbal notification 24-hour telephone line	Written report Designated person
Ontario	416-325-3000 1-800-268-6060	Regional Director, Environmental Enforcement Directorate Ontario Region Environment and Climate Change Canada 867 Lakeshore Road Burlington, ON, L7S 1A1 <a href="mailto:ec.dale-ontdegarde-eed-ontoncall.ec@canada.ca">ec.dale-ontdegarde-eed-ontoncall.ec@canada.ca</a>

**Written report**

The following information must be included in the written report:

1. The name, civic address and telephone number of the person who is providing the written report.
2. If applicable, the name of the entity or person that is responsible for the facility that is associated with the environmental emergency.
3. If applicable, the North American Industry Classification System codes, consisting of at least four digits, that describe the operations at the facility that is associated with the environmental emergency.
4. The date and time of the environmental emergency and the location where it occurred, including the latitude and longitude, expressed in decimal degrees to five decimal places, and, if applicable, the civic address of that location.



5. The name, CAS registry number and, if applicable, UN number of the substance that was released or likely to be released.
6. The quantity of the substance that was released or likely to be released or, if the quantity cannot be determined, an estimate of it.
7. If the substance is or was in a container system, a description of the container system, including a description of its condition.
8. A description of the harmful effects or potential harmful effects of the environmental emergency on the environment and on human life or health, including effects on any surrounding hospitals, schools, residential, commercial or industrial buildings, highways, public transit infrastructure, parks, forests, wildlife habitats, water sources or water bodies.
9. A description of the circumstances of the environmental emergency and its cause, if known, and of the measures taken to mitigate any harmful effects on the environment or on human life or health.
10. A description of all measures taken or planned to be taken to prevent similar environmental emergencies from occurring.

**Verbal notification**

In order for Environment and Climate Change Canada (ECCC) to fully comprehend the details surrounding an environmental emergency incident, ECCC recommends that a verbal notification include the following information:

- the reporting person's name, and the telephone number at which the person can be immediately contacted
- the name of the person who owns or has the charge, management or control of the substance immediately before the environmental emergency
- the date and time of the release
- the location of the release
- the name/CAS registry number of the substance released
- the estimated quantity of the substance released
- the means of containment (from which the substance was released) and a description of its condition
- the number of deaths and injuries resulting from the environmental emergency
- the surrounding area/environment affected and potential impact of the release (mobility of release and weather or geographic conditions at the site)
- a brief description of the circumstances leading to the release
- the cause of the release (if known)
- details of the actions taken or further actions contemplated (to contain, recover, clean up and dispose of the substance involved)
- the names of agencies notified or on-scene
- other pertinent information

**COMMUNICATION**

- Govan Brown Incident Investigation & Reporting Policy and procedure located in the Govan Brown health and safety binder and be posted in the workplace H&S safety Boards.
- Govan Brown's Incident Investigation & Reporting Policy and procedure will be communicated to all new Govan Brown workers, supervisors, and managers through new employee general orientation or site-specific induction and/ or through periodic management and staff safety meetings or toolbox talk meetings.
- All existing Govan Brown staff will receive orientation through the OHS Program / Occupational Health and Safety Management System (OHSMS) orientation and /or through Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) communication and periodic management and staff safety meetings as well as through periodic and ongoing safety training, internal communication protocols or structured training sessions.
- The results and the injury incidents investigation corrective actions will be communicated to the employees in several ways through the Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC), site safety talks, onsite safety bulletin boards, and through periodic health and safety reports.
- This procedure will be made available at the point of use to workers, subcontractors and suppliers upon request.

## **TRAINING**

- All new managers, supervisors, and workers will receive training Govan Brown Incident Investigation & Reporting Policy, Program and Procedures during their on-boarding training upon hire.
- All new employees will receive awareness training as part of their orientation on their specific health and safety roles and responsibilities through the new hire orientation process.
- All existing employees will receive training on their health and safety roles and responsibilities through periodic staff OHS Program / Occupational Health and Safety Management System (OHSMS) orientation safety meetings as well as through periodic and ongoing safety training or structured training sessions.
- Verification of training will be confirmed via sign off and may include knowledge verification testing.

## **EVALUATION**

- The Incident Investigation & Reporting Policy and procedures will be reviewed on annual basis by Senior Management and /or during the annual OHS Program / Occupational Health and Safety Management System (OHSMS) internal audit and maybe changed due to business needs, any legal requirements and based on the results of the evaluation to ensure it continues to meet OHS regulation and standards and to ensure it is relevant with current operations and any changes will be indicated in the meetings minutes or reflected on the revision page.
- The Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) and management will also be involved with the evaluation by analyzing forwarded items of concern and suggesting corrective action.
- On a yearly basis, management will review OHS Program / Occupational Health and Safety Management System (OHSMS) to assess whether it is still compliant with current regulations and with the current work environment. If necessary and if required procedure will be amended to reflect the current operation.
- After the year-end audit a thorough analysis of the gaps identified will be conducted by the Internal Auditor & Senior Management will develop an action plan that addresses the deficiencies with an overall goal of continual improvement.
- Senior Management at least annually or more often as required should review and validate company Document Control Master List with indication supporting documents needed to implement, monitor and maintain active OHS Program / Occupational Health and Safety Management System (OHSMS) effectively and assess conformance with business, corporate and legal requirements as well as compliance with applicable standards.
- Document Controller or Designee will coordinate and manage Document Control Register to ensure changes to, and current versions status of, documents are identified and tracked in order to prevent the unintended use of obsolete documents and identify such documents if they are retained for any purpose.

## **ACKNOWLEDGEMENTS AND IMPROVEMENTS**

- The success of the incident investigation policy and procedures will be acknowledged as corrective actions are followed up and reviewed for effectiveness as part of regular audits; periodically via company emails, safety reports or workplace inspections.
- The success of the Incident Investigation Procedures will be reported to individual site offices as part of yearly audits; periodically via company emails, safety reports or workplace inspections.
- Upon yearly review of the incident investigation policy and procedure, review of effectiveness of corrective actions the senior management will evaluate; identify gaps, develop and implement an action plan to address the identified areas of improvement as part of the continuous improvement process.

## **REFERENCES**

Occupational Health and Safety Act R.S.O. 1990  
OHS Program / Occupational Health and Safety Management System (OHSMS)  
Document Control Master List  
Document Control Register  
Accident / Incident investigation report  
Witness statement  
Notice of incident / accident occurrence  
Near Miss Report  
Injury, illness & incident reporting chart

**EMERGENCY PREPAREDNESS POLICY STATEMENT**

Govan Brown Associates Limited senior management recognizes all workers' rights to work in a safe and healthy work environment and fully understands and supports the fundamental principles to prevent losses from workplace incidents occurrences through the provision of safe and healthy work environment.

Govan Brown Associates Limited senior management considers emergency preparedness to be of critical importance and effective emergency preparedness ensures that our organisation is able to rapidly respond to and efficiently recover from an emergency.

Govan Brown Associates Limited senior management committed to establish, implement, and maintain procedures to prevent, prepare for, and respond to emergencies including:

- Identification of potential emergency situations where there is risk of illness or injury;
- Planned responses to emergency situations and to prevent or mitigate any illness or injury;
- Identification of the necessary resources to implement the procedures effectively;
- Periodic testing of planned emergency responses through drills and similar activities;
- Periodic review and updating of procedures especially after the occurrence of an emergency situation or a periodic test;
- Communication with workers and provision of training so that they can fulfil their duties and responsibilities with respect to the procedures; and
- Communication with contractors, visitors, relevant emergency response services, government authorities, and the local community, as appropriate.

Govan Brown Associates Limited, will elaborate, define and implement Emergency Response Plan(s) and specific procedures structured according to accepted planning principles and consistent with prevailing emergency-related legislation for handling sudden or unexpected situations with main objectives to:

- Prevent fatalities and injuries.
- Reduce damage to buildings, stock, and equipment.
- Protect the environment and the community.
- Accelerate the resumption of normal operations.

Govan Brown Associates Limited will ensure that exercises, fire drill, mock evacuation are conducted annually to practice all or critical portions of the Emergency Response Plan and adequate training provided to the assigned personnel. Thorough and immediate review after each exercise, drill, or after an actual emergency will be performed by Govan Brown Associates Limited management to point out areas that require improvement, and implementation of corrective actions will take place not later than a one-month span of time, or as stated by provincial/local legislative requirements. Emergency Response Plan should be revised when shortcomings have become known and will be reviewed at least annually.

Govan Brown Associates Limited will, where possible, support the municipality, the region and the province in preparing for, responding to or recovering from emergency situations as required with adequate communication with relevant work parties and authorities.

Govan Brown Associates Limited, as an employer, is ultimately responsible for worker health and safety. As president, I give you my personal commitment that I will comply with my duties under the Occupational Health and Safety Act, such as taking every reasonable precaution for the protection of workers in the workplace.



March 22/24

Colin Gray

Date

President – Govan Brown Associates Limited

## EMERGENCY PREPAREDNESS PROGRAM & PROCEDURE

### PURPOSE

Govan Brown is committed, both legally and ethically, to ensuring a safe and healthy working environment for all employees. The preservation of life is our utmost priority. The Emergency Preparedness Program and Procedure serve as essential components of our health and safety system. They provide planned directions and identify the necessary resources to effectively respond to emergency situations in our office, shop, and project sites. By following this plan, we can contain emergencies, reduce panic, and prevent loss of life and property.

### SCOPE

This policy and procedure apply to all Govan Brown employees and subcontractors. It is an integral part of our comprehensive Occupational Health and Safety Management System (OHSMS), which includes specific integrated supplementary First Aid elements.

### DEFINITION

An **emergency** is a real or potentially life-threatening situation that can be the result of natural, human or unknown causes and may require additional inside or outside assistance.

## ROLES AND RESPONSIBILITIES

### MANAGEMENT

- Ensure that Supervisors receive training on the emergency response procedures.
- Prepare and maintain emergency response plans for our facilities and project sites.
- Develop site maps highlighting emergency response areas, equipment, and means of reporting emergencies.
- Conduct annual mock evacuation drills or discussions of site-specific emergency response procedures.
- Ensure the presence of adequately trained personnel at our facilities and project sites, including qualified First Aiders in case of emergencies.
- Provide immediate transportation to a medical facility or the worker's home, as appropriate.
- Ensure subcontractors have prepared and tested specific trade emergency response procedures.
- Outline an Action Plan related to Emergency Preparedness to address any identified deficiencies.

### SUPERVISORS

- Fulfill assigned response duties and adhere to workplace procedures for emergency evacuation and rescue.
- Participate in training on emergency response procedures.
- Be knowledgeable about and effectively communicate the emergency response plan and evacuation procedures to workers.
- Provide training to workers on emergency response procedures.

### WORKERS

- Be aware, understand, and acknowledge Govan Brown's emergency response requirements.
- Contribute input into the development of the emergency response plan and evacuation procedures.
- Participate in education, training, and mock evacuation exercises.
- Follow workplace procedures for emergency evacuation and rescue.
- Observe and comply with the instructions of emergency personnel and authorities.
- Immediately report all emergency situations to their supervisor.

### DEDICATED FIRST AIDER

- Administer appropriate first aid treatment upon being informed of an injured or ill worker.
- Complete a First Aid Report, documenting the provided treatment or advice.
- Assist in ensuring that injured or ill workers receive necessary medical attention.
- Provide a statement of witnessed events and cooperate in investigations, reporting incidents, injuries, or illnesses to their supervisor or manager.
- Receive training on legislative and organization-specific reporting requirements and investigation procedures

## IDENTIFICATION OF POTENTIAL EMERGENCY SITUATIONS

Govan Brown recognizes the critical importance of identifying potential emergency situations in the workplace to prevent or minimize the impact of emergencies, safeguard the well-being of its workforce and stakeholders, and maintain a healthy and safe working environment. To achieve this, Govan Brown has established a robust hazard risk assessment process that assesses probabilities and consequences connected with hazards arising from human activities, technological events, and natural perils.

The identification of potential emergency situations linked to completed hazard assessments serves as a crucial foundation for developing comprehensive emergency response strategies and fostering a culture of preparedness throughout the organization. Govan Brown's hazard identification and evaluation process takes into account various hazards and risk factors, including the severity of the hazard, the likelihood of its occurrence, and the potential impact on employees and the surrounding environment.

Completed hazard assessments provide valuable insights into the potential emergency situations that could arise and encompass a wide range of potential risks and hazards present in the workplace. These may include, but are not limited to:

- Actions, conditions, or events that could cause severe and immediate harm to health and safety.
- Potential fatalities and life-threatening injuries.
- Fires and explosions.
- Spills and other releases of dangerous substances.
- Equipment or utility failures.
- Transportation accidents.

In addition, Govan Brown recognizes the importance of external hazard assessments and historical or statistical data analysis in identifying potential emergency situations beyond the scope of its own operations. This may involve considering hazard assessments completed by external parties or utilizing provincial and/or municipal emergency preparedness arrangements for environmental emergencies such as earthquakes, floods, blizzards, severe storms, and others.

By conducting thorough hazard assessments and identifying potential emergency situations, Govan Brown is able to develop effective emergency response scenarios and implement appropriate control measures. This proactive approach ensures that the organization is prepared to respond effectively in the event of an emergency and helps mitigate the risks associated with identified hazards. Govan Brown remains committed to continuously reviewing and updating its hazard assessments to stay ahead of potential emergency situations and maintain a resilient and safe working environment.

## EMERGENCY RESPONSE GUIDELINES

**In the event of an emergency, the following guidelines outline the basic steps to be taken:**

**Stay Calm:** Do not panic. It's important to remain calm and composed. Panicking can escalate the situation and hinder the emergency response. Your calm demeanor can help influence others around you.

**Take Command:** Alert the supervisory staff immediately. Call emergency services (911) or delegate someone to make the call. Clearly explain the situation and provide necessary details. Assign someone to meet and guide the ambulance or emergency response team to the location.

**Assess the Situation:** Approach the scene with extreme caution to avoid personal injury. Try to understand what happened and determine the nature of the emergency. Take necessary steps to eliminate or control the cause of the emergency, ensuring the safety of the injured person, others, and the property. If trained to do so, provide first aid promptly and effectively.

**Provide Protection:** Take measures to protect others from harm and prevent further losses. This may involve redirecting traffic, extinguishing a fire, securing objects to prevent them from falling, or shutting down equipment or utilities.

**Preserve the Scene:** Unless necessary to save lives, alleviate suffering, or prevent immediate or further damage, avoid disturbing anything at the scene. Establish barriers, rope off the area, post signage or assign a guard to ensure the scene remains intact until authorities complete their investigation.

**Follow Procedures:** Refer to the emergency response plan and follow the outlined procedures. Inform the supervisory staff or senior management about the incident. They can contact the appropriate authorities, notify relatives if necessary, and initiate the reporting and investigation processes.

## EMERGENCY RESPONSE PLAN

### Documented Response Plans and Roles:

The developed documented emergency response plans must undergo a thorough review and approval process by senior management. This ensures that the plan aligns with the organization's strategic objectives, meets regulatory requirements, and reflects the organization's commitment to safety and emergency preparedness.

The emergency response protocols include well-documented response plans that outline the roles and responsibilities of relevant employees during emergencies as well as include important arrangements and information. These plans clearly define the actions and duties assigned to Emergency Response Team and individuals to ensure an organized and coordinated response.

The documented response plans outline a systematic and well-structured approach to emergency situations provide step-by-step guidelines and protocols that employees should follow to mitigate risks, protect lives, and minimize damage. The plans cover a range of potential emergency scenarios and address the specific actions required in each situation.

### Input and Consultation from Relevant Parties:

Govan Brown values the collaboration and input of relevant stakeholders in the development and implementation of the emergency response plan. The organization actively engages in consultation with various parties, including operations, transportation, technical specialties, neighboring businesses, public relations, risk management, health, safety, and the environment, security, government regulations, emergency services, municipal planning, medicine, and public utilities. This collaboration ensures that the emergency response plan takes into account diverse perspectives, expertise, and potential challenges related to emergency management.

Govan Brown also recognizes the benefits of mutual aid partnerships in strengthening emergency response capabilities. Through partnerships with neighboring businesses, emergency services, clients, and contractors, Govan Brown establishes mutual aid agreements that facilitate the sharing of resources, expertise, and support during emergencies. These agreements include protocols for requesting and providing assistance, creating a network of support that enhances the organization's emergency preparedness and response efforts.

### Identification of Resources and Emergency Response Equipment

Govan Brown's documented emergency response plan includes a comprehensive identification of the necessary resources to effectively implement the plan. This encompasses personnel, key emergency contacts, direction maps, flow charts or layout plans with equipment, tools, materials, and direct communication channels with local emergency services, regulatory agencies, and other public resources. These resources are crucial for prompt and efficient responses to emergency situations.

Govan Brown is committed to ensuring the availability and readiness of emergency response equipment. All equipment is appropriately marked, regularly inspected, and maintained to ensure its functionality during emergencies. This includes first aid stations, emergency supplies, firefighting equipment, communication devices, evacuation routes, and any other essential equipment specific to potential emergencies.

Govan Brown maintains first aid stations with appropriate facilities and supplies to address immediate medical needs during emergencies. Qualified first aiders are trained and designated to provide prompt and effective first aid assistance.

Provision is made to transport injured workers to medical facilities for further treatment, ensuring timely and appropriate care. This includes arrangements for transportation vehicles or communication with local medical services to facilitate the transportation process.

### Prevention or minimization harm or illness in emergency situations

Govan Brown's emergency response plan, integrated within the Occupational Health and Safety (OHS) management system, is specifically designed to prevent and minimize harm or illness during emergency situations, with a strong focus on the safety and well-being of employees and stakeholders. This incorporates but not limited the following key measures:

- Implementing comprehensive safety protocols and procedures to mitigate risks and hazards associated with emergencies.
- Providing appropriate personal protective equipment (PPE) to minimize potential injuries or exposure to occupational illnesses.
- Establishing clear and effective evacuation procedures that ensure the safe and orderly evacuation of personnel.
- Conducting regular workplace inspections and risk assessments to identify and proactively address potential hazards.

- Training employees on emergency response protocols, including the proper use of safety equipment and evacuation procedures.
- Promoting a culture of safety awareness and proactive hazard identification and reporting among employees.
- Conducting regular emergency response drills and exercises to enhance preparedness and familiarize employees with proper procedures.
- Offering ongoing training and education on emergency response, hazard recognition, and the use of safety equipment.
- Implementing a robust inspection and maintenance program for emergency equipment and systems to ensure their functionality.
- Establishing a system for reporting and investigating near-miss incidents, taking corrective actions to address identified issues.
- Collaborating with external organizations, such as emergency services and regulatory agencies, to stay updated on best practices and requirements.
- Continuously reviewing and updating the emergency response plan based on lessons learned, stakeholder feedback, and changes in regulations or industry standards.

### **Emergency Communication System**

Govan Brown prioritizes the establishment of an effective emergency communication system to ensure the prompt and accurate dissemination of critical information during emergency situations. This system utilizes a variety of communication channels and tools to facilitate clear and efficient communication among all involved parties.

Key elements of Govan Brown's emergency communication system include:

- **Clear Communication Channels:** Govan Brown establishes designated channels for emergency communication, such as dedicated phone lines, two-way radios, mobile phones, air horns, and word of mouth. These channels are regularly tested and maintained to ensure their functionality in emergency scenarios.
- **Alarm Systems:** Govan Brown installs alarm systems throughout its facilities and project sites, including sirens, bells, visual indicators, and air horns. These alarm systems provide a clear and unmistakable signal to alert individuals of an emergency and prompt them to take necessary actions.
- **Public Address Systems:** Public address systems are strategically placed in areas where employees and stakeholders are present. These systems allow for the broadcast of important announcements, instructions, and updates during an emergency. Trained personnel are designated to operate and communicate through the public address systems effectively.
- **Digital Platforms:** Govan Brown leverages digital platforms, such as email alerts, text messages, internal communication tools, and mobile phone notifications, to rapidly disseminate emergency information. These platforms enable real-time communication, ensuring that individuals receive timely updates regardless of their location within the organization.
- **Communication Protocols:** Govan Brown establishes clear communication protocols, including designated emergency contact persons and escalation procedures. These protocols ensure that information flows efficiently between relevant parties, such as internal workforce, emergency response team, first aid responders as well as external stakeholders including police, fire departments, regulatory agencies, and other public authorities. By following established communication protocols, coordinated responses are facilitated, and potential confusion is minimized.

### **Emergency Response Training, Testing, and Communication**

Govan Brown places great importance on emergency preparedness and provides its employees with comprehensive emergency response training. This training is specifically tailored to their roles and responsibilities, ensuring that they possess the necessary knowledge and skills to respond effectively during emergency situations. Training sessions may include safety orientation, internal training sessions, toolbox talks, meetings, and annual reviews to reinforce the importance of emergency preparedness.

To assess the effectiveness of the emergency response plan, Govan Brown conducts periodic testing, such as drills or simulations. These exercises allow the organization to evaluate the readiness of personnel, identify any gaps or areas for improvement, and make necessary adjustments to enhance the plan. Detailed records of testing and any corrective actions taken are meticulously maintained to support ongoing improvement efforts and ensure compliance with legislative requirements.

In addition to testing, Govan Brown conducts annual reviews of its emergency procedures and response plans. These reviews are crucial for ensuring that the plans remain up-to-date, relevant, and in compliance with regulatory requirements. Incorporating best practices and lessons learned from real-life incidents and exercises further strengthens the organization's emergency preparedness.

Effective communication is vital during emergency response situations. Govan Brown is committed to communicating relevant information to all parties involved, including workers, visitors, contractors, emergency response services, government authorities, and the community. This communication encompasses sharing the emergency response plan, providing training sessions, and disseminating timely updates and instructions as required by legislative requirements.

To ensure accurate documentation and proper implementation of emergency response plans, Govan Brown utilizes specific forms and documentation. These may include equipment inspection forms, testing records, incident reports, and communication logs. By capturing and documenting the implementation process, Govan Brown maintains accountability, compliance, and continuous improvement in emergency preparedness.

Through comprehensive emergency response training, regular testing and review, effective communication, and meticulous documentation, Govan Brown fosters a culture of preparedness and safety. This enables the organization to respond promptly and effectively to emergency situations, safeguarding the well-being of its employees and stakeholders

## **EMERGENCY RESPONSE TEAM**

Govan Brown has established an Emergency Response Team (ERT) to effectively coordinate and respond to emergency situations. The team includes the following key roles:

### **ERP COORDINATOR (ERC):**

The ERP Coordinator is designated and authorized to oversee and coordinate all activities related to emergency response. This individual take charge in the event of a hazardous incident and is responsible for making critical decisions and taking necessary actions to ensure the safety and well-being of personnel and the effective management of the emergency. The ERP Coordinator may also serve as the point of contact for external entities, such as emergency response teams, authorities, and other stakeholders.

### **ERP TEAM (ERT):**

The ERP Team consists of competent individuals who are assigned specific duties and responsibilities during emergency situations. These team members are authorized to assist the ERP Coordinator or their designated representative in coordinating and responding to the emergency. The team may include the Site Supervisor, trained ERT members, and First Aid Responders. Additional optional personnel may be included, such as a Public Information Coordinator responsible for communicating information to the public and media, Advisors who provide specialized expertise or guidance, and a Record Keeper who ensures accurate documentation and records are maintained.

### **FIRST AID RESPONSE TEAM:**

The First Aid Response Team is responsible for providing immediate first aid assistance during emergency situations at the site. These trained individuals administer necessary first aid treatments to injured individuals and ensure their well-being until additional medical help arrives if needed.

The Emergency Response Team plays a crucial role in promptly and effectively responding to emergencies, coordinating actions, and providing necessary support and care to individuals affected by the incident. Through their expertise and coordinated efforts, they contribute to maintaining a safe and secure environment for all personnel and stakeholders

### **AS NEEDED PERSONNEL**

In addition to the core members of the Emergency Response Team, Govan Brown may designate and deploy As Needed Personnel based on the nature of the emergency. These individuals possess specialized skills and expertise that are essential for specific emergency scenarios. Examples of As Needed personnel include, but are not limited to:

- Firefighting Team: Trained in fire suppression techniques and capable of performing rescue operations.
- HazMat Specialists: Knowledgeable in handling hazardous materials incidents and skilled in implementing contaminant control methods.
- Environmental Scientists: Provide advisory services and predictions on the movement of hazardous materials through the environment.
- Industrial Hygienists: Assess and mitigate potential health hazards in the workplace.

These As Needed Personnel contribute their expertise and capabilities to the Emergency Response Team, playing crucial roles in promptly and effectively responding to emergencies. They coordinate actions, provide necessary support, and care for individuals affected by the incident. Through their specialized knowledge and coordinated efforts, they help maintain a safe and secure environment for all personnel and stakeholders



## EMERGENCY RESPONSE TEAM & WORK PARTIES RESPONSIBILITIES

<b>Emergency Response Coordinator (ERC)</b>	<ul style="list-style-type: none"> <li>Assumes control of the emergency and leadership of the Govan Brown Emergency Response Team (ERT);</li> <li>Verification that company permanent premises, facilities or project site Emergency Response Plan is carried out Govan Brown and Subcontractor Supervision / Workers;</li> <li>Maintains ongoing communication with ERT members to coordinate emergency response;</li> <li>Verifies that coordination with local Emergency Medical Services (EMS) and/or local utility providers has occurred;</li> <li>Verifies once the emergency has been resolved and communicates the return to work to Subcontractor Supervision;</li> <li>Provides appropriate notification as required;</li> <li>Verification that the appropriate incident investigation for the emergency is initiated.</li> </ul>
<b>Emergency Response Coordinator (ERC) Designate / Alternate</b>	<ul style="list-style-type: none"> <li>In the absence of the ERC, assume control of the emergency and leadership of the Govan Brown Emergency Response Team (ERT);</li> <li>Refer to ERC responsibilities noted above;</li> <li>Provide ongoing assistance as requested by Govan Brown ERC during permanent premises, facilities or project site evacuation;</li> <li>Relay information pertaining to company permanent premises, facilities or project site conditions; emergency assembly area(s) / muster point(s);</li> <li>Assist in coordination of local Emergency Medical Services (EMS) and/or local utility providers as required;</li> <li>Assist in the collection of witness statements and initiation of incident investigation as directed by the Management/ERC;</li> </ul>
<b>Emergency Response Team Members</b>	<ul style="list-style-type: none"> <li>Assist as requested by ERC or designate in the evacuation of all workers on the company permanent premises, facilities or project site;</li> <li>Assist as requested by ERC or designate in the coordination of all workers to the designated emergency assembly area(s) / muster point(s);</li> <li>Assist as requested by ERC or designate in the coordination of local EMS on to the company permanent premises, facilities or project site;</li> <li>Report the progress of the company permanent premises, facilities or project site evacuation (Subcontractor Worker head-count at emergency assembly area(s) / muster point(s), evacuated areas, remaining hazards / project conditions);</li> <li>Assist in verification that the permanent premises, facilities or project site specific Visitor Log has been utilized to account for all persons on the company permanent premises, facilities or project site on the day of the evacuation;</li> <li>Provide first-aid assistance to injured parties if/when it is safe to do so as directed by ERC or designate;</li> </ul>
<b>First-Aid Provider</b>	<ul style="list-style-type: none"> <li>Provide first-aid assistance to injured parties if/when it is safe to do so as directed by ERC or designate;</li> <li>Monitors the condition of injured workers as required by the ERC;</li> <li>Provides a summary of any first-aid rendered on the company permanent premises, facilities or project site to local EMS upon arrival;</li> <li>Participate in Govan Brown incident investigation as required by the ERC / Management;</li> </ul>
<b>ALL Workers</b>	<ul style="list-style-type: none"> <li>Follow direction of ERC or immediate supervisor to ensure work area is made safe;</li> <li>Proceed to designated emergency assembly area(s) / muster point(s);</li> <li>Report to ERC or immediate supervisor upon arrival to the emergency assembly area(s) / muster point(s) for head-count and further instructions;</li> <li>Participate in the Govan Brown incident investigation process as required;</li> </ul>
<b>ALL Subcontractors</b>	<ul style="list-style-type: none"> <li>Upon notification of an emergency in which a company permanent premises, facilities or project site evacuation is required, ensure all work is stopped immediately;</li> <li>Advise all workers under their direct supervision to evacuate to designated emergency assembly area(s) / muster point(s);</li> <li>Ensure all work areas are made safe (energy isolation/shut-off, lower loads if possible);</li> <li>Provide ERC with headcount of workers located at the emergency assembly area(s) / muster point(s);</li> <li>Participate as required in the Govan Brown incident investigation process;</li> </ul>

## EMERGENCY SYSTEMS

Govan Brown has implemented comprehensive emergency systems in its locations to prioritize the safety and well-being of employees and stakeholders. The specific systems and measures may vary depending on the location, but generally include:

### **Automatic Sprinkler System**

Buildings are equipped with automatic sprinkler protection throughout their floor areas to quickly suppress fires and minimize their spread.

### **Standpipe System**

Wet standpipe systems with fire hose cabinets are strategically located throughout the buildings, enabling access to water for firefighting purposes.

### **Fire Exits**

Each building is constructed with at least one fire exit in each zone to facilitate safe evacuation. It is the responsibility of all employees to be aware of the locations of fire exits and ensure they remain unobstructed at all times.

### **Fire Alarm System**

The fire alarm system is directly connected to a monitoring company, ensuring prompt notification and response in the event of a fire or emergency.

### **Emergency Lighting**

Emergency lights are installed throughout the buildings, including above each emergency exit. In the event of a power failure, these lights provide sufficient illumination for a 30-minute evacuation.

### **Employee Meeting Area**

A designated muster point is established where everyone gathers during emergency evacuations. This area is clearly marked on the Health & Safety Board and throughout the location, and attendance is taken by the ERP Coordinator to ensure accountability.

### **Project Site & Specific Emergency Preparedness Arrangements**

Project sites may have specific emergency response procedures, including emergency contact numbers, maps to the nearest hospital, and site-specific emergency response plans. The current emergency response plan is posted on the project site Safety board and communicated to work parties during site orientation and toolbox talks.

### **Fire Extinguishers**

Adequate capacity and ABC type fire extinguishers are readily available and maintained in marked locations throughout the workplace. Employees who are required to use fire extinguishers receive training on their proper use. Monthly inspections by a competent person ensure that fire extinguishers are in working order, and any damaged or discharged units are promptly refilled or replaced.

### **First Aid Kits/Facilities**

First aid kits are conveniently located and easily accessible to all employees. They are regularly inspected, restocked, and equipped with a treatment log as per Regulation 1101. First aiders receive training to provide immediate assistance, and their training certificates or names are prominently displayed in the workplace.

### **Emergency Communication System**

Company maintains an effective emergency communication system utilizing various channels, including dedicated phone lines, two-way radios, mobile phones, air horns, and word of mouth. Regular testing and maintenance of these channels ensure their reliability during emergency scenarios, facilitating clear and efficient communication among all involved parties. This includes communication with external parties such as police, fire, regulatory agencies, and other public authorities. Contact information for these external parties, including emergency contact numbers, is readily available and communicated as part of the emergency response plan.

### **Transportation of Injured Worker**

A vehicle must be available at all times for transporting an injured worker to a hospital or medical facility.

### **Eye Wash Stations**

Eye wash stations are well marked and strategically located throughout the workplace to provide immediate flushing of the eyes in case of chemical exposure or eye-related emergencies.

### **Spill Kits**

Spill kits containing appropriate absorbent materials, personal protective equipment, and cleanup tools are marked and readily available in areas where hazardous materials are handled or stored. These kits allow for the prompt containment and cleanup of spills to minimize the risk of accidents or environmental damage.

## POTENTIAL EMERGENCY SITUATIONS

The full scope of the most appropriate scenarios and responses in the event of potential emergency situations will be documented and communicated in Govan Brown Emergency Response Plan (ERP).

However, some basic (not all) events and hazards that could cause or lead to the emergency and workplace emergency preparedness procedures provided below in the manual include, but are not limited to:

### GENERAL EVACUATION PROCEDURE

In case of emergency evacuation, the following evacuation procedure is to be followed:

#### Notification

Workers, visitors, or the public may be informed of an evacuation by means of Air horn /site alarm; or word of mouth.

The evacuation signal/alarm will be initiated by Govan Brown Emergency Response Coordinator (ERC) or designate.

#### Stop Work / Make Work Area Safe

All workers are to stop work and follow the direction of their immediate supervisor to ensure their work area is made safe. This could involve de-energizing tools/equipment, lowering loads (if possible) or securing loose materials.

#### Proceed to Emergency Assembly Area(s) / Muster Point(s)

All workers are to immediately proceed to the designated Emergency Assembly Area(s) / Muster Point(s).

It is important for all workers to know the location of the nearest emergency exit and where an alternate exit is located in the event of an obstruction or hazard.

#### Report to Emergency Assembly Area / Muster Point ERC or designate

Workers: Report to your immediate supervisor upon arrival to the emergency assembly area(s) / muster point(s) so that an accurate head count can be collected. All workers are to remain at the emergency assembly area(s) / muster point(s) until otherwise directed by Govan Brown Emergency Response Coordinator (ERC) or designate.

Subcontractor Supervisor: Report to the emergency assembly area(s) / muster point(s) Govan Brown Emergency Response Coordinator (ERC) or designate and provide a head count of your respective workers.

#### Resume Work

Work shall only be resumed under the direction / approval of the Govan Brown Emergency Response Coordinator (ERC) or designate.

### 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.
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 Workplace Safety and Insurance Board (WSIB) or Ministry of Labour, Training and Skills Development (MLSTD) as required.

### POWER OUTAGE

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.

### NATURAL GAS LEAK

1. If you smell natural gas inform your supervisor or manager.
2. Do not light matches or lighters, do not turn on or turn off electrical devices.
3. Evacuate the area using the closest exit to an upwind location.
4. Instruct occupants to not smoke or use any electrical devices.
5. Identify and evaluate any injuries.
6. If required, contact 911 by sending someone to the nearest phone, or provide immediate transportation to the doctor's office or hospital as required.
7. Contact the utility contractor responsible for the equipment causing the leak.

### BUILDING/STRUCTURE COLLAPSE

*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.

*If collapsed building is observed:*

1. Call 911 immediately.
2. Do not attempt to enter the area.
3. Report your observations to the site supervisor and responding emergency personnel.

### MOBILE EQUIPMENT FAILURE

*If working around a failing equipment:*

1. Move unnecessary personnel to a safe zone. Move surrounding equipment out of the way.
2. Maintain two-way communication with operator and assist in navigating equipment.
3. Refer to manufacturer's instructions based on the equipment for assistance.

*If operating the failing equipment:*

1. Remain calm. Do not remove your seatbelt.
2. Maintain two-way communication with supervisor and address the failure.
3. Follow supervisor's instructions.

### POWERLINE CONTACT

1. Stay on the equipment. Never touch the equipment and the ground at the same time. In fact, touching anything that is in contact with the ground can be fatal.
2. Keep others away. No one else should touch the equipment or its load—including buckets, outriggers, load lines, and any other part of the machine. Beware of time-delayed relays. Even after breakers are tripped by line damage, relays may be triggered to restore power.
3. Break contact. The operator can try to break contact by moving the equipment clear of the wires while remaining inside the machine. However, that may not be possible if the contact has welded a conductor to the equipment.
4. Call the local utility. Get someone to call the local electrical utility for help. Stay on the equipment until the utility shuts down the line and confirms that the power is off. Report every incident of powerline contact to the utility - they'll check for damage that could cause the line to fail later.
5. Report the contact. If the powerline is rated at 750 volts or more:
  - Report the contact to the inspection department of the Electrical Safety Authority within 48 hours.
  - Provide notice in writing to Ministry of Labour, Training and Skills Development (MLSTD) and to the Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC), 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 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.

## CHEMICAL SPILL OR RELEASE

### Prior to work with hazardous materials:

- Determine spill procedures from Safety Data Sheets (SDS) for all chemicals.
- Anyone handling hazardous materials needs trained in spill procedures.
- Obtain proper spill kits and cleaning material.

### Small spills that pose no immediate threat to health:

- Stop – Think! Do not rush.
- Notify occupants in the immediate area of the spill.
- Carefully plan cleanup. Decide if you can safely handle the spill. (If unsure call MOE at 416-325-3000).
- Eliminate all ignition sources if flammable material is involved.
- Proceed with response to the spill only if you are trained on spill response procedure.
- Use adequate personal protective equipment and use spill kits to absorb and contain according to spill response procedure.
- Carefully remove other materials from the path of the spill.
- Confine the spill to a small area. Do not allow the material to spread.
- Place material in a secure and ventilated area.
- Contact supervisor for disposal instructions.
- Clean up area of spill and dispose of chemical waste as required.

### Large spills or spills that pose an immediate threat to health:

- Notify occupants in the immediate area of the spill.
- Eliminate all ignition sources if flammable material is involved.
- Initiate emergency response protocol.
- Evacuate the immediate area.
- Call your supervisor or follow emergency response contact protocol.
- Follow the instructions from Emergency Response Coordinator.

## FIRE AND EXPLOSION

### If you detect a fire:

1. Back away - assess the danger.
2. Sound an alarm - use pull station, shouts (word of mouth “FIRE, FIRE, FIRE”, radio, cell phone, air horn etc.);
3. Alert co-workers to evacuate the area - remain calm.
4. Use a fire extinguisher only if you trained and it is safe to do so.
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.

### 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, “head count.”
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.

**VEHICLE INCIDENT**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.

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.

**WORKPLACE VIOLENCE**

1. Call the police, fire department or paramedics, summon medical attention, secure the location or evacuate the premises.
2. Remove yourself from the situation if you can. (There may be little sense in asking the perpetrator to stop, since doing so might just provoke that person even further.)
3. Wherever possible, it is important to let the harasser or abuser know right away that his or her behaviour is unacceptable and that it must stop immediately.
4. Follow the general evacuation procedure found in this document.

**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.

**TORNADO**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. Go to a small, interior room or stairwell on the lowest floor of the building (bathrooms are often the best choice). If possible, crouch under heavy furniture. Protect your head with a cushion or mattress.
3. Get under a sturdy piece of furniture and use your arms to protect your head and neck.
4. Do not open windows.

If outdoors:

1. Do not wait until the tornado is visible to get inside. Seek shelter in a building (not car or mobile home) immediately. If no shelter is available, lie flat in a low dry spot (ravine or ditch) or under a low bridge. Keep alert for flash floods. Protect your head. As a last resort, hang on tightly to the base of a shrub or small tree. If you cannot seek shelter, lie flat in a ditch or depression and cover your head with your hands. If you cannot seek shelter, lie flat in a ditch or depression and cover your head with your hands.
2. Do not go under an overpass or bridge if nearby, you are safer in a low, flat area.

If you are in a vehicle:

Do not stay in a vehicle or mobile home and do not try to outrun a tornado by driving, especially in populated areas. If possible, run to a nearby solid structure (shelter or building). If no solid structure is nearby, lie flat in a dry ditch or ravine outside. Keep alert for flash floods. Protect your head.

**HAIL***If indoors:*

Stay away from windows and glass doors. be alert for signs of high winds or tornado (especially if hail is large) and follow tornado precautions as necessary.

*If outdoors:*

Seek cover, face away from wind and protect your head. be alert for signs of high winds or tornadoes (especially if hail is large) and follow tornado precautions as necessary.

*If you are in a vehicle:*

Keep face and head away from windows. be alert for signs of high winds or tornado (especially if hail is large) and follow tornado precautions as necessary.

**LIGHTNING***If indoors:*

Close windows and doors and keep away from windows, doors and fireplaces. Don't go out unless it is necessary. before a storm hits, unplug appliances including radio, television and computers and do not touch electrical items or telephones during the storm.

*If outdoors:*

Get inside a vehicle or building if possible. avoid water and objects that conduct electricity (i.e. tractors, golf clubs, metal fences). Do not stay in open spaces or under tall objects (trees, poles). If no shelter is available crouch down, feet close together with head tucked down. If you're in a group, spread out, keeping people several yards apart. remember, lightning victims can be revived with CPR even when there is no pulse.

*If you are in a vehicle:*

Stay in vehicle with windows closed. Be wary of downed power lines that may be touching your car. You are safe in the car but may be struck if you step outside. avoid touching metal parts of the vehicle. Do not drive - wait. Do not park under trees or other tall objects that may fall over in the storm.

**EARTHQUAKE***If indoors:*

1. Drop, cover and hold; go under a sturdy piece of furniture, cover your head and hold on.
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.

*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.

*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.

**FLOOD**

1. Unplug electrical equipment if safe to do so.
2. Be ready to evacuate as directed.
3. Follow the evacuation routes.

*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.

## BLIZZARD

### If indoors:

1. Await instruction from Site Supervisor.
2. Stay indoors!
3. Eat and drink. Food provides the body with energy and heat. Fluids prevent dehydration.

### 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.

### 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.
  - Turn on the dome light at night when running the engine.
  - Tie a coloured cloth to your antenna or door.
  - Raise the hood after the snow stops falling.

## OTHER INCLEMENT WEATHER CONDITIONS

### 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 advice of the supervisor. If severe weather is in progress refer Tornado guidelines.

### 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.
3. Supervisor may determine whether it is necessary to move to a safe area, return to town or wait out the storm.

### 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.

## EXPOSURE TO POTENTIAL CASE OR SUSPECTED EXPOSURE TO COVID-19

1. **If you think that you might have the flu:** Call Telehealth at 1-866-797-0000 to talk to a registered nurse (24/7) and follow the instructions provided. Notify your supervisor immediately, complete the self-assessment and follow the instructions provided.
2. **If you start to feel symptoms of COVID-19:** Anyone who begins to feel unwell (fever, new cough, or difficulty breathing) should return home and self-isolate immediately. Notify your supervisor immediately, complete the self-assessment, wash or sanitize their hands, wear a mask, and isolate until they are able to return to their home. Where possible, return home in a private vehicle, not public transit.
3. People who are self-isolating should seek clinical assessment over the phone: either by calling their primary care provider's office or Telehealth Ontario (1-866-797-0000). If you need additional assessment, your primary care provider or Telehealth Ontario will direct you.



**Call 911 if you are experiencing any of the following symptoms:**

- severe difficulty breathing (struggling for each breath, can only speak in single words)
- severe chest pain (constant tightness or crushing sensation)
- feeling confused or unsure of where you are
- losing consciousness

**FALL RESCUE**

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.

**TRENCH COLLAPSE / CAVE-IN**

Care must be taken to prevent injury and death to rescuers, whether from a further cave-in or other hazards when trying to rescue casualties caught/ buried by a cave-in. **ANY TRENCH RESCUE OPERATIONS** shall be conducted by the Emergency Response team properly trained to perform a rescue.

Incidents without 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.

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.
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. All work is to be stopped within the vicinity and area is to be isolated to limit exposure.
8. Maintain a clear pathway for trained rescue personnel to prepare for rescue.
9. Follow the Trench Collapse Plan where applicable based on the site specifications

**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.

**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 CO2 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.

**POTENTIAL OPIOID OVERDOSE AND NASAL SPRAY NALOXONE KIT RESPONSE**

If you are with someone who is having an opioid overdose:

1. Shout their name and shake their shoulders
2. Call 9-1-1 if they are unresponsive
3. Give naloxone:
  - Nasal spray kit: lay the person on their back, insert the tip of nozzle into one nostril and press the plunger firmly
4. Perform chest compressions and/or rescue breathing
5. If there is no improvement after 2-3 minutes, repeat steps 3 and 4. Stay with them.

If the person begins breathing on their own, or if you have to leave them on their own, put them in the recovery position.

Stay until the ambulance arrives in case paramedics need help or information, or the overdose symptoms return. With more powerful opioids (fentanyl and carfentanil) there is a possibility that a person will overdose again even after they have been given naloxone and even if they don't use more drugs.

**COMMUNICATION**

- Govan Brown Emergency Preparedness Policy, procedures and Emergency Response Plan located in the Govan Brown health and safety binder and be posted in the workplace H&S safety Boards.
- Govan Brown's Emergency Preparedness Policy, procedures and Emergency Response Plan will be communicated to all new Govan Brown workers, supervisors, and managers through new employee general orientation or site-specific induction and/ or through periodic management and staff safety meetings or toolbox talk meetings.
- All existing Govan Brown staff will receive orientation through the OHS Program / Occupational Health and Safety Management System (OHSMS) orientation and /or through Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) communication and periodic management and staff safety meetings as well as through periodic and ongoing safety training, internal communication protocols or structured training sessions.
- Project sites might have specific Emergency preparedness arrangements (including Emergency Contact Numbers, Map to the nearest hospital, site specific Emergency Response procedures etc.).
- Current Emergency Response Plan and documentation will be kept in workplace / on project site Safety board and communicated to work parties during the safety meeting, site orientation / toolbox talks.
- This procedure will be made available at the point of use to workers, subcontractors and suppliers upon request.

**TRAINING**

- All new employees will receive awareness orientation with regard to the emergency preparedness policy through the new hire orientation process and by reviewing the HS manual. All existing employees will receive training on the policy through the safety manual training, through periodic safety meeting and formal safety training sessions.
- 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.
- Workers who are designated as rescue and emergency workers are trained in emergency response appropriate to the work site and potential emergencies identified in the emergency response plan.

- Workers who may be required to use a fire extinguisher and who may be in charge of spill response will be trained by completing Fire Extinguisher and Spill Response training accordingly.
- Additional and or specific training may be provided as part of fire drill/mock evacuation. These must include exercises appropriate to the work site that simulate potential emergencies identified in the emergency response plan. These will be repeated once yearly and as required to ensure rescue and evacuation personnel are competent to carry out their duties.
- At least one employee from each work area per shift will receive First Aid/CPR training in accordance with the recommendations provided by St. John Ambulance 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.
- Verification of training will be confirmed via sign off and may include knowledge verification testing.

## **EVALUATION**

- Emergency Preparedness Policy, procedures will be reviewed on annual basis by Senior Management and /or during the annual OHS Program / Occupational Health and Safety Management System (OHSMS) internal audit and maybe changed due to business needs, any legal requirements and based on the results of the evaluation to ensure it continues to meet OHS regulation and standards and to ensure it is relevant with current operations and any changes will be indicated in the meetings minutes or reflected on the revision page.
- The Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) and management will also be involved with the evaluation by analyzing forwarded items of concern and suggesting corrective action.
- On a yearly basis, management will review OHS Program / Occupational Health and Safety Management System (OHSMS) to assess whether it is still compliant with current regulations and with the current work environment. If necessary and if required procedure will be amended to reflect the current operation.
- After the year-end audit a thorough analysis of the gaps identified will be conducted by the Internal Auditor & Senior Management will develop an action plan that addresses the deficiencies with an overall goal of continual improvement.
- Senior Management at least annually or more often as required should review and validate company Document Control Master List with indication supporting documents needed to implement, monitor and maintain active OHS Program / Occupational Health and Safety Management System (OHSMS) effectively and assess conformance with business, corporate and legal requirements as well as compliance with applicable standards.
- Document Controller or Designee will coordinate and manage Document Control Register to ensure changes to, and current versions status of, documents are identified and tracked in order to prevent the unintended use of obsolete documents and identify such documents if they are retained for any purpose

## **REFERENCES**

Occupational Health and Safety Act R.S.O. 1990

OHS Program / Occupational Health and Safety Management System (OHSMS)

Document Control Master List

Document Control Register

Emergency Response plan

Specific EL 11 and EL15 ER forms identified & controlled through Document Control Master List & Document Control Register

Emergency Response Drill Evaluation

## STATISTICS AND RECORDS POLICY STATEMENT

Govan Brown Associates Limited's senior management recognized that the systematic collection and analysis of data to monitor health and safety performance and to identify emerging risks and trends are critical for the effective functioning of our Health and Safety Program.

Monitoring current and past health and safety records and statistics is a major part of our active health and safety program where policies, procedures, notices, statements and reports are necessary to fulfil legal and health and safety program requirements.

Govan Brown Associates Limited will maintain records and statistics relating to health and safety performance as required by the Occupational Health and Safety Act (OHSA), Ministry of Labour, Immigration, Training and Skills Development (MLITSD), Workplace Safety and Insurance Board (WSIB), Worker Compensation Board of Alberta (WCB), WorkSafeBC and established Govan Brown Associates Limited health and safety program policies and procedures.

Maintenance of Health and Safety statistics and records together with evaluation of leading & lagging Key Performance Indicators (KPI's) will aim to:

- Monitor and evaluate the health and safety performance of the company, specific job sites, supervisors, workers and subcontractors.
- Identify common factors, gaps or trends in incidents to assist in the development of the incident reduction program and our overall health and safety program.
- Monitor and evaluate the effectiveness of corrective actions.
- Meet all legislated requirements.

Every worker must:

- Report all incidents, accidents, first aid occurrences, near-misses, motor vehicle accident, and equipment/property damage to their supervisors immediately.

Supervisors must:

- Send all relevant documentation regarding all incidents, accidents, first aid occurrences, near misses and equipment damage to the safety director and the vice president of site management within set time frame.
- Send all relevant health and safety information to the head office and follow up with procedures to prevent similar occurrences.

Management must:

- Establish a process for developing and capturing leading & lagging Key Performance Indicators (KPI's) for statistics and trend analysis.
- Define roles and responsibilities pertaining to statistics and trend analysis.
- Establish method for developing corporate and/or project health and safety reports for continual improvement.
- Maintain all relevant documentation regarding all incidents, accidents, first aid occurrences, near misses and equipment damage.
- Monitor and review Health and Safety performance of the organization and ensure follow up of all action items from the annual review with further communication to relevant work parties.

This policy and supplementary procedures will be reviewed by senior management at least annually or more frequently as required to ensure measures and arrangements are maintained and updated when required, to reflect process changes, regulations updates and re-approved as appropriate with retention of documented records of the review.



Colin Gray

President – Govan Brown Associates Limited

March 22/24

Date

## STATISTICS AND RECORDS PROGRAM & PROCEDURE

### PURPOSE

The purpose of this program and procedure is to provide guidelines for organizing and monitoring the active Health and Safety (H&S) program, as well as measuring its effectiveness through the analysis of statistics. The goal is to continually improve the program and prevent accidents, injuries, and property damage.

### SCOPE

This procedure applies to all supervisors, management, and Health & Safety Representatives (HSR) / Joint Health and Safety Committees (JHSC) / Joint Occupational Health and Safety Committee (JOHSC) at Govan Brown workplaces. It outlines the process for developing and capturing leading and lagging H&S Key Performance Indicators (KPIs) including qualitative and quantitative measurements for statistical analysis, leading to continuous system and performance improvements.

### DEFINITIONS

#### Leading Key Performance Indicators (KPI)

Leading KPIs are proactive measures that focus on health and safety performance with the goal of continuous improvement.

- They monitor ongoing activities and initiatives aimed at preventing worker illness, injury, and the severity of harm.
- Leading indicators encompass qualitative and quantitative measurement data, including near miss reports, first aid treatment records, workplace inspection reports, safety meetings, and other leading indicators specific to the organization.
- By tracking leading KPIs, organizations can identify potential risks, enhance preventive measures, and foster a proactive safety culture.

#### Lagging Key Performance Indicators (KPI)

Lagging KPIs measure the end results of health and safety processes, policies, and procedures.

- They reflect past outcomes and measure the occurrence and severity of incidents, injuries, and harm.
- Lagging indicators include quantitative measurement data of negative or unwanted outcomes such as such as medical aid incidents, time loss incidents, enforcement orders, fatalities, critical injuries, and other lagging indicators specific to the organization.
- Lagging KPIs provide insights into historical performance, help identify trends, evaluate the effectiveness of safety measures, and drive improvements in the organization's safety systems.

Examples of leading and lagging indicators include but not limited:

<b>LEADING KPI</b>	<b>LAGGING KPI</b>
<ul style="list-style-type: none"> <li>• Near miss reports</li> <li>• First aid treatment records</li> <li>• Workplace inspection reports</li> <li>• Safety meetings</li> </ul>	<ul style="list-style-type: none"> <li>• Medical aid incidents</li> <li>• Time loss incidents</li> <li>• Ministry of Labour, Training and Skills Development (MLTSD) Stop Work Orders</li> <li>• Fatality / Critical injury incidents</li> </ul>

#### Qualitative Measurements

Qualitative measurements refer to non-numerical data that provide descriptive insights into health and safety performance.

- These measurements focus on the subjective aspects of safety, such as attitudes, behaviors, and perceptions.
- They provide valuable information for understanding the overall safety culture and identifying areas for improvement.
- Qualitative measurements also include the severity or magnitude of harm or injury, such as fatalities, critical injuries, medical aid cases, first aid cases, lost time injuries, and incidents without personal injuries.
- They help evaluate the effectiveness of safety programs, training initiatives, and risk management strategies.

#### Quantitative Measurements

Quantitative measurements refer to numerical data that provide objective and measurable indicators of health and safety performance.

- These measurements are based on numerical values, counts, or frequencies and provide quantifiable information about incidents, injuries, and other safety-related data.

- They include the numerical values or counts of reported cases of severity or magnitude of harm or injury, such as fatalities, critical injuries, medical aid cases, first aid cases, lost time injuries, incidents without personal injuries, and near misses.
- These measurements enable statistical analysis, trend identification, benchmarking, and the assessment of safety measures' effectiveness, performance tracking, and improvement target setting.

## **GOALS**

The goals of the Statistics and Records Program & Procedure are to:

- Establish a process for developing and capturing leading and lagging Key Performance Indicators (KPIs) for statistical analysis and trend identification.
- Define roles and responsibilities related to statistics and trend analysis.
- Establish a method for developing comprehensive corporate and/or project health and safety reports to support continual improvement.
- Ensure that the reports provide a comprehensive overview of the organization's health and safety performance, including qualitative and quantitative measurements, leading and lagging indicators, and comparisons to previous periods.

## **ROLES AND RESPONSIBILITIES**

### **MANAGEMENT**

- Establish Key Performance Indicator (KPI) tracking requirements and targets for the company to meet defined goals and objectives.
- Provide requirements for capturing trend statistics.
- Ensure management reviews safety trend analysis periodically to provide information for improving the Health and Safety (H&S) Program and performance.
- Utilize statistical analysis during the annual senior management review, acknowledging successes and defining improvement plans where deficiencies are identified.
- Post monthly and/or quarterly corporate and/or project-specific trend analysis reports.
- Include the statistics and records component in the Action Plan when deficiencies are identified.
- Determine methods for tracking and reporting statistics used for KPIs.
- Create Trend Analysis reports to monitor KPIs.
- Post the Trend Analysis report on the H&S Communication board.
- Track and monitor the progress and effectiveness of corrective action implementations.

### **SUPERVISORS**

- Ensure that all health and safety documentation is completed and submitted to the proper personnel for review, as required.
- Collect and populate safety statistics for KPI's.
- Implement corrective actions.
- Performs regular workplace inspections as required.
- Monitor workers to ensure hazard assessments completed.

### **HEALTH & SAFETY REPRESENTATIVE**

- Provide necessary applicable safety statistics for relevant KPIs.
- Provide support to supervisors in implementing corrective actions.
- Participate in the review and discussion of outcomes and corrective actions based on the Health and Safety Statistic and Trend Analysis.

### **WORKERS**

- Aware, understand and acknowledge Govan Brown statistics and records requirements.
- Report all accidents, incidents, first aid occurrences and equipment damage to supervisors.
- Participate in review and discussion on the outcomes or corrective actions based on Health and Safety Statistic and Trend Analysis.

### **INTERNAL AUDITOR**

- Conduct the internal audit and submit the report to senior management.

## PROCEDURE

### HEALTH AND SAFETY STATISTIC AND TREND ANALYSIS REPORT

The Health and Safety Statistic and Trend Analysis Report is designed to organize, monitor, and measure the performance of the Health and Safety (H&S) program. This report collects and analyzes the following information, incorporating leading and lagging KPI's together with qualitative and quantitative measurements appropriate to the organization:

#### Documentation Statistics

Following documentation is collected and analysed through Health and Safety Statistic and Trend Analysis Report.

##### Qualitative measurements:

- Safety Talks/Meetings: Evaluation of employee perceptions regarding safety, including their attitudes and behaviors towards H&S practices.
- Workplace Inspection Reports: Assessment of safety culture through observations and identification of areas for improvement.
- Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) Meetings: Review of JHSC/JOHSC activities, including their contribution to the overall safety culture.
- Hazard Assessments: Evaluation of hazard identification and control measures implemented by conducting qualitative assessments.

##### Quantitative measurements:

- First Aid Reports: Tracking the number of first aid cases and based on the severity of injuries to measure the effectiveness of first aid provisions.
- Incident Reports: Collecting numerical data on incidents to identify trends, patterns, and frequency and severity rates of lost time injuries.
- Ministry of Labour, Training and Skills Development (MLTSD) inspections/orders: Compliance tracking of MLTSD inspections and orders to ensure regulatory adherence.
- Subcontractors' Incidents: Recording the number of incidents involving subcontractors and near misses to evaluate their safety performance.

#### Incident Statistics

Following incident statistics identified on the Incident Investigation Reports are collected, reviewed, and inputted into the Health and Safety Statistic and Trend Analysis Report.

##### Qualitative measurements:

- Incident Reports: Analysis of incident reports based on the severity or magnitude of harm or such as fatalities, critical injuries, medical aid cases, first aid cases, lost time injuries, and incidents without personal injuries.
- Incidents (no personal injuries): Tracking incidents that do not result in personal injuries to identify potential hazards and assess the effectiveness of control measures.
- Near Misses: Analyzing near misses reported and investigated to proactively address potential hazards and prevent incidents.

##### Quantitative measurements:

- Fatalities/Critical Injuries/ Lost Time Injuries: Analyse numbers and monitoring the frequency and severity to identify areas for improvement and track progress.
- First Aid Cases: Measuring the frequency of first aid cases to understand the occurrence of injuries and illnesses.
- Medical Aid Cases: Recording the number of medical aid cases and their nature to understand the health impacts on workers

#### Annual Statistics and Review

Aligned with Govan Brown's unwavering commitment to continuous improvement in health and safety, management generates interim corporate health and safety summaries on a quarterly basis, incorporating project summaries. These summaries provide a comprehensive assessment of the organization's health and safety performance, utilizing qualitative and quantitative measurements of H&S Key Performance Indicators (KPIs) with Year-to-Date (YTD) statistical analysis.

The interim summaries encompass a range of elements designed to evaluate and enhance the health and safety program. These elements include, but are not limited to:

- **Leading and Lagging Performance Indicators:** The summaries track both leading and lagging indicators that reflect the organization's proactive and reactive measures. This holistic approach provides a comprehensive understanding of health and safety performance and facilitates the identification of areas for improvement.
- **Comparison of Current Performance with Past Performance:** By comparing current health and safety performance with previous periods, the summaries assess progress and gauge the effectiveness of implemented measures. This analysis helps identify trends and evaluate the impact of improvement efforts, providing insights for further enhancement.

- **Analysis of Statistics and Identification of Trends:** The summaries delve into the collected statistics, conducting a thorough analysis to identify trends and patterns in health and safety performance. This analytical process aids in pinpointing recurring issues, potential risks, and areas that require focused attention or improvement.
- **Analysis of First Aid Treatment Records:** The summaries include a comprehensive examination of first aid treatment records, offering valuable insights into the frequency and nature of injuries and illnesses. This analysis deepens the understanding of health impacts on workers and guides efforts to prevent and address workplace hazards effectively.
- **Incident Rates and Trends:** The summaries evaluate incident rates and trends, shedding light on areas of concern as well as progress made in preventing accidents, injuries, and near misses. This information empowers the organization to allocate resources strategically and implement targeted interventions where they are most needed.
- **Compliance with Health and Safety Regulations:** The summaries assess the organization's adherence to applicable health and safety regulations, ensuring compliance with legal requirements and industry standards. This evaluation promotes a culture of compliance and reinforces a strong foundation for safe work practices.
- **Effectiveness of Safety Programs and Initiatives:** The summaries gauge the effectiveness of implemented safety programs and initiatives, providing valuable insights into the impact of training, risk management strategies, and other preventive measures. This evaluation guides the development of future initiatives and improvements, contributing to the continual enhancement of the organization's health and safety objectives.

At the conclusion of the year, the statistics collected from the Health and Safety Statistic and Trend Analysis Report are consolidated into an annual report. This report offers a comprehensive overview of the organization's health and safety statistics and activities for the year, enabling a comprehensive evaluation of performance. Additionally, a Year-to-Year (YOY) comparison can be conducted to assess progress and measure the effectiveness of efforts aimed at improving health and safety performance.

**Health and Safety Trends**

Based on the review of health and safety trends, an action plan could be developed to address the identified areas. This proactive plan takes into consideration several key aspects, including:

- **Training Needs:** The analysis may reveal specific areas where additional training is required to enhance employee knowledge and skills. Targeted training programs can be developed to address these areas, ensuring that employees are equipped with the necessary competencies to perform their tasks safely.
- **Equipment Maintenance or Replacement:** The analysis may indicate instances where equipment maintenance or replacement is necessary to maintain a safe work environment. Ensuring that equipment is properly maintained and functional is vital for mitigating potential hazards and reducing the risk of accidents or injuries.
- **Safe Work Practices and Procedures:** The analysis may identify the need for the development or enhancement of safe work practices and procedures. Implementing robust and effective practices and procedures is crucial for promoting a culture of safety and reducing the likelihood of incidents.
- **Job Hazard Assessments:** The analysis may highlight the importance of conducting specific job hazard assessments. These assessments enable the organization to identify and evaluate potential risks associated with specific tasks or work environments, allowing for the implementation of appropriate control measures.
- **Communication and Safety Talks:** The analysis may reveal the need to create and review safety talks with workers or supervisors. Safety talks provide a platform for open communication, sharing important safety information, addressing concerns, and reinforcing safe behaviors.

**First Aid Records**

First aid treatment records play a crucial role in monitoring and analyzing health and safety performance. These records will be diligently collected and reviewed on a monthly basis, providing quantitative data on first aid incidents. This information is invaluable for identifying patterns, trends, and areas of concern within the organization.

The collected data will be incorporated into the interim corporate health and safety summaries, which are also accompanied by project summaries on a quarterly basis. This integration ensures that the first aid treatment records contribute to a comprehensive analysis of health and safety performance.

These trends will serve as important indicators for potential areas of improvement. If necessary, an action plan will be developed to address the identified trends and implement appropriate measures to enhance health and safety within the organization. This proactive approach ensures that any recurring issues or risks associated with first aid incidents are promptly addressed, contributing to the continuous improvement of the health and safety program.

By carefully reviewing and analyzing first aid treatment records, the organization gains valuable insights into the effectiveness of existing safety measures and identifies opportunities for further enhancement. This proactive approach promotes a safer work environment and supports the overall goal of preventing incidents and ensuring the well-being of all employees.



### **Health and Safety Audits**

To ensure the effectiveness of the health and safety management system, formal internal audits are conducted at a minimum on an annual basis. However, the frequency of internal audits may increase in response to accidents or incidents of significance, considering their status and potential impact. These audits are designed to determine the necessary preventive actions required to prevent recurrence and promote a proactive safety culture within the organization.

Senior management has the option to engage either an external expert or an internal party to perform these formal internal audits. This approach allows for an independent and thorough assessment of the company's health and safety management system.

Based on the summary and recommendations derived from the health and safety audits, an action plan will be developed. This plan will address any identified deficiencies outlined in the audit report and provide a roadmap for implementing corrective and preventive actions to improve health and safety throughout the organization. To ensure effective communication and implementation, the audit results and action plan will be shared with workers through various channels such as meeting minutes, memos, and toolbox talks.

The action plan itself will be prominently displayed on the health and safety board in the office or site trailer, or alternatively, it will be distributed via email. This ensures that all employees are informed about the planned actions and are aware of their respective roles and responsibilities in executing the plan. Regular updates, such as postings, memos, and toolbox talks, will keep workers informed about the progress made and the actions taken in response to the audit findings.

In addition to the audits, management will conduct a comprehensive analysis of monthly, quarterly, and annual statistics, including the first aid treatment records. These records provide valuable quantitative data that contribute to the evaluation of the organization's health and safety performance. By monitoring these statistics, management can measure the effectiveness of the active safety system and identify areas for improvement.

Furthermore, management will diligently review the outcomes of the annual audits to assess the current status and effectiveness of the health and safety system. This review is an integral part of the management review process and facilitates continual improvement by identifying strengths, weaknesses, and opportunities for enhancement.

By conducting regular audits, implementing robust action plans, and analyzing performance statistics, Govan Brown demonstrates its commitment to maintaining a high standard of health and safety. This proactive approach ensures ongoing compliance, fosters a culture of continuous improvement, and ultimately safeguards the well-being of employees in the workplace.

### **Records and Communication**

Govan Brown recognizes the importance of effectively recording and communicating statistics and trends results, audit outcomes, and action plans to ensure the continuous improvement of health and safety. The following measures are in place to facilitate this process:

#### **Communication to Relevant Parties**

- Statistics and trends results, audit outcomes, and action plans will be documented communicated to senior management, supervisors, health and safety representatives, workers and other relevant stakeholders.
- Clear and concise communication channels will be utilized to ensure that all parties are informed of the findings, recommendations, and required actions.
- Communication methods may include meetings, minutes, memos, toolbox talks, or other internal communication platforms, depending on the organization's preferences and needs.

#### **Timely Implementation of Corrective Actions**

- Upon identifying issues through statistics and trends analysis or audit outcomes, prompt action will be taken to address and resolve the identified issues.
- The implementation of necessary corrective actions will be prioritized to ensure the timely improvement of health and safety performance.

#### **Integration to Orientation and Training Programs**

- Statistics and trends results, audit outcomes, and action plans will be incorporated into the orientation process for new employees.
- All employees will undergo health and safety orientation and annual safety training, during which statistics and trends analysis reports, audit outcomes, and action plans will be reinforced and updated.

#### **Diverse Training Methods**

- Training sessions will be conducted using a combination of methods to ensure effective understanding and retention of information.
- These methods may include presentations, interactive discussions, case studies, focus group discussions, and practical exercises.

- Training sessions may be delivered in person, online, or through a blended learning approach, depending on the availability and preferences of the participants.

#### Utilization of Specified Forms and Software

- To facilitate the recording and documentation of statistics, trends, audit outcomes, and action plans, specified forms and/or software may be used.
- These tools provide a structured format for capturing and organizing the relevant information, ensuring consistency and ease of analysis.
- The selection of specific forms and software will be based on the organization's requirements, resources, and technological capabilities.

## COMMUNICATION

- Govan Brown Statistics and Records Policy and procedures located in the Govan Brown health and safety binder and be posted in the workplace H&S safety Boards.
- Govan Brown's Statistics and Records Policy and procedures will be communicated to all new Govan Brown workers, supervisors, and managers through new employee general orientation or site-specific induction and/or through periodic management and staff safety meetings or toolbox talk meetings.
- All existing Govan Brown staff will receive orientation through the OHS Program / Occupational Health and Safety Management System (OHSMS) orientation and /or through Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) communication and periodic management and staff safety meetings as well as through periodic and ongoing safety training, internal communication protocols or structured training sessions.
- Health and Safety Trend and documentation will be kept in workplace / on project site Safety board and communicated to work parties during the safety meeting, site orientation / toolbox talks.
- This procedure will be made available at the point of use to workers, subcontractors and suppliers upon request.

## TRAINING

- All new managers, supervisors, and workers will receive training Govan Brown Statistics and Records Policy, Program and Procedures during their on-boarding training upon hire.
- All new employees will receive awareness training as part of their orientation on their specific health and safety roles and responsibilities through the new hire orientation process.
- All existing employees will receive training on their health and safety roles and responsibilities through periodic staff OHS Program / Occupational Health and Safety Management System (OHSMS) orientation safety meetings as well as through periodic and ongoing safety training or structured training sessions.
- Verification of training will be confirmed via sign off and may include knowledge verification testing.

## EVALUATION

- Statistics and Records Policy, Program, procedures will be reviewed on annual basis by Senior Management and /or during the annual OHS Program / Occupational Health and Safety Management System (OHSMS) internal audit and maybe changed due to business needs, any legal requirements and based on the results of the evaluation to ensure it continues to meet OHS regulation and standards and to ensure it is relevant with current operations and any changes will be indicated in the meetings minutes or reflected on the revision page.
- The Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) and management will also be involved with the evaluation by analyzing forwarded items of concern and suggesting corrective action.
- On a yearly basis, management will review OHS Program / Occupational Health and Safety Management System (OHSMS) to assess whether it is still compliant with current regulations and with the current work environment. If necessary and if required procedure will be amended to reflect the current operation.
- After the year-end audit a thorough analysis of the gaps identified will be conducted by the Internal Auditor & Senior Management will develop an action plan that addresses the deficiencies with an overall goal of continual improvement.
- Senior Management at least annually or more often as required should review and validate company Document Control Master List with indication supporting documents needed to implement, monitor and maintain active OHS Program / Occupational Health and Safety Management System (OHSMS) effectively and assess conformance with business, corporate and legal requirements as well as compliance with applicable standards.
- Document Controller or Designee will coordinate and manage Document Control Register to ensure changes to, and current versions status of, documents are identified and tracked in order to prevent the unintended use of obsolete documents and identify such documents if they are retained for any purpose

**REFERENCES**

Occupational Health and Safety Act R.S.O. 1990

OHS Program / Occupational Health and Safety Management System (OHSMS)

Document Control Master List

Document Control Register

Health and Safety Statistics and Trend Analysis Report

WISR (Workplace Injury Summary Report)

WSIB clearance certificate and CAD-7 records

## LEGISLATION POLICY STATEMENT

Govan Brown Associates Limited senior management fully understands and acknowledged that legislation governing workplaces in Ontario is known as the Occupational Health and Safety Act (OHSA) and the OHSA is the law and is common to all workplaces regardless of the type of work being done.

Govan Brown Associates Limited senior management recognizes all workers' rights to work in a safe and healthy work environment and fully understands and supports the fundamental principles to prevent losses from workplace incidents occurrences through the provision of safe and healthy work environment.

In order to achieve this goal focusing on loss prevention, Govan Brown Associates Limited, identified and established effective policy and procedural framework to know and understand all legal requirements that are applicable to our operational activities. All our operational activities, employees and equipment must be in-compliance with the act and its applicable regulations.

Govan Brown Associates Limited senior management will provide, implement and enforce necessary arrangements together with provision information, training, instruction and supervision in order to comply with legal requirements and will ensure that:

- Health and safety legislations as well as all applicable acts and regulations are considered during the job planning process.
- Copies of relevant legislations are readily available at each workplace as required.
- All supervisors are trained on their rights, duties and responsibilities and how to exercise them.
- All workers are trained on their rights, duties and responsibilities and how to exercise them.
- All legislated workplace posting requirements are met.

Annual performance reviews will be conducted by Govan Brown Associates Limited senior management to review health and safety due diligence and legislative requirements including this policy, procedural framework and list of applicable legislation.

As president, I give you my personal commitment that I will comply with my duties under the Occupational Health and Safety Act, such as taking every reasonable precaution for the protection of workers in the workplace,



March 22/24

Colin Gray

Date

President – Govan Brown Associates Limited

## LEGISLATION PROGRAM & PROCEDURE

### PURPOSE

The purpose of this Legislation Program & Procedure is to outline GB's commitment to identify and comply with all applicable Occupational Health and Safety (OHS) legislation, as well as other requirements such as standards, codes, guidelines, and manufacturer's specifications. This program aims to ensure that the organization operates in compliance with all relevant legal and industry obligations when planning and executing all work.

### SCOPE

The Legislation Program & Procedure applies to all Govan Brown supervisors, managers, and workers. It encompasses the identification, understanding, and compliance with OHS legislation, as well as other requirements that are applicable to the organization's operations.

### GOALS

- Identify all applicable OHS legislation, including regulations, acts, standards, codes, guidelines, and manufacturer's specifications that pertain to the organization's work activities.
- Ensure compliance with all identified legal and industry requirements.
- Provide education and training to employees on their responsibilities related to OHS legislation and other applicable requirements.
- Regularly review and update the Legislation Program & Procedure to reflect any changes in legislation or other relevant requirements.
- Establish mechanisms for monitoring and verifying compliance with OHS legislation and other applicable requirements.
- Consider health and safety legislation during the job planning process, including all relevant acts and regulations.
- Ensure copies of relevant legislation are readily available at each project as required.

### DEFINITIONS

**OHS Legislation:** Refers to the legal framework that governs occupational health and safety, including regulations, acts, and other statutory requirements at the local, regional, and national levels.

**Other Requirements:** Includes standards, codes, guidelines, and manufacturer's specifications that are relevant to the organization's work activities and contribute to maintaining a safe and healthy work environment.

**Competent Person** is a person who:

- Is qualified because of knowledge, training and experience to organize the work and its performance.
- Is familiar with the Occupational Health and Safety Act and the regulations that apply to the work.
- Has knowledge of any potential or actual danger to health or safety in the workplace.

**Employees:** All of the individuals employed by the company (includes Managers, Supervisors, and Workers)

**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.

**Supervisor:** a person who has charge of a workplace or authority over a worker and is deemed a competent person.

**Worker:** an individual employed by a company (full time, part-time, volunteer or on a contractual basis). For the purpose of this H&S program, a worker will be defined as an individual who does not have management or supervisor responsibilities.

**Visitor:** a person who is designated as someone who is not regularly daily worker on site or office, any who will not be engaging in actual work.

## ROLES AND RESPONSIBILITIES

### MANAGEMENT

- Perform hazard assessments and evaluate the applicable legislative requirements for the job site.
- Ensure hazard assessments are conducted in alignment with the Hazard Recognition and Control Policy and procedure for identifying and controlling occupational health and safety hazards.
- Initiate and monitor site-specific controls as determined by hazard assessments, documenting inspections.
- Provide adequate training to relevant workplace parties regarding applicable legislative requirements, roles, and responsibilities.
- Appoint a competent supervisor.
- Provide required legislative training to the supervisor.
- Outline an action plan related to the legislation component when deficiencies are identified.
- Comply with all duties as an employer under the Occupational Health and Safety Act, R.S.O. 1990:

An **Employer** shall ensure that,

- a) the equipment, materials and protective devices as prescribed are provided;
- b) the equipment, materials and protective devices provided by the employer are maintained in good condition;
- c) the measures and procedures prescribed are carried out in the workplace;
- d) the equipment, materials and protective devices provided by the employer are used as prescribed; and
- e) a building, structure, or any part thereof, or any other part of a workplace, whether temporary or permanent, can support any loads that may be applied to it,
  - i. as determined by the applicable design requirements established under the version of the Building Code that was in force at the time of its construction,
  - ii. in accordance with such other requirements as may be prescribed, or
  - iii. in accordance with good engineering practice, if sub clauses (i) and (ii) do not apply. R.S.O. 1990, c.O.1, s.25(1); 2011, c.11, s.9.

In addition, an **Employer** shall:

- a) provide information, instruction and supervision to a worker to protect the health or safety of the worker;
- b) in a medical emergency for diagnosis or treatment, provide, upon request, information in the possession of the employer, including confidential business information, to a legally qualified medical practitioner and to such other persons as may be prescribed;
- c) when appointing a supervisor, appoint a competent person;
- d) acquaint a worker or a person in authority over a worker with any hazard in the work and in the handling, storage, use, disposal and transport of any article, device, equipment or a biological, chemical or physical agent;
- e) afford assistance and co-operation to a committee and a health and safety representative in the carrying out by the committee and the health and safety representative of any of their functions;
- f) only employ in or about a workplace a person over such age as may be prescribed;
- g) not knowingly permit a person who is under such age as may be prescribed to be in or about a workplace;
- h) take every precaution reasonable in the circumstances for the protection of a worker;
- i) post, in the workplace, a copy of this Act and any explanatory material prepared by the Ministry, both in English and the majority language of the workplace, outlining the rights, responsibilities and duties of workers;
- j) prepare and review at least annually a written occupational health and safety policy and develop and maintain a program to implement that policy;
- k) post at a conspicuous location in the workplace a copy of the occupational health and safety policy; provide to the committee or to a health and safety representative the results of a report respecting occupational health and safety that is in the employer's possession and, if that report is in writing, a copy of the portions of the report that concern occupational health and safety; and
- l) advise workers of the results of a report referred to in clause (l) and, if the report is in writing, make available to them on request copies of the portions of the report that concern occupational health and safety. R.S.O. 1990, c.O.1, s.25(2).

**SUPERVISOR**

- Conduct and review required hazard assessments and identify work tasks and associated hazards.
- Advise workers of identified hazards and guide them on mitigating risks and working safely.
- Comply with all duties under the Occupational Health and Safety Act.
- Ensure workers:
  - Work in compliance with the provisions of the OH&S Act and relevant regulations.
  - Use or wear the equipment, protective devices, or clothing required by the employer.
- Advise workers of any potential or actual danger to health or safety in the workplace.
- Provide written instructions, where prescribed, for worker protection.
- Take every reasonable precaution for the protection of workers as prescribed in R.S.O. 1990, c. O.1, s. 27.
- Assign another designated competent supervisor when absent from a project site.

**WORKERS**

- Demonstrate awareness, understanding, and acknowledgment of worker rights and responsibilities under the Occupational Health and Safety Act.
- Participate in all employer-mandated training.
- Actively participate in and adhere to employer-outlined legislative requirements and hazard assessments.
- Comply with all duties under the Occupational Health and Safety Act, including:
  - Working in compliance with the provisions of the OH&S Act and relevant regulations.
  - Using or wearing required equipment, protective devices, or clothing.
  - Reporting any equipment or protective device absence or defect that may endanger oneself or others.
  - Reporting any contraventions of the Act, regulations, or known hazards.

No Worker shall;

- remove or make ineffective any protective device required by the regulations or by his or her employer, without providing an adequate temporary protective device and when the need for removing or making ineffective the protective device has ceased, the protective device shall be replaced immediately;
- use or operate any equipment, machine, device or thing or work in a manner that may endanger himself, herself or any other worker; or
- engage in any prank, contest, feat of strength, unnecessary running or rough and boisterous conduct.

**CONTRACTOR/SUBCONTRACTOR**

- Conduct required hazard assessments and identify work tasks and associated hazards.
- Advise contractor/subcontractor workers of identified hazards and guide them on mitigating risks and working safely.
- Comply with all duties under the Occupational Health and Safety Act.
- Ensure workers:
  - Work in compliance with the provisions of the OH&S Act and relevant regulations.
  - Use or wear the equipment, protective devices, or clothing required by the employer.
- Advise workers of any potential or actual danger to health or safety in the workplace.
- Provide written instructions, where prescribed, for worker protection.
- Take every reasonable precaution for the protection of workers.
- Assign another designated competent supervisor when absent from a project site.

**VISITOR**

- Take reasonable care for your own and others' health and safety.
- Comply with any reasonable instructions, policies, and procedures established by Govan Brown and the employer.
- All visitors must come to the reception desk/work location at Govan Brown premises and sign the visitors' log immediately upon arrival. As part of the log-in process, visitors will be briefed on workplace hazards and emergency procedures.

- Always be escorted by their designated host at all times, unless previous arrangements have been made. If necessary, Govan Brown will accompany visitors to ensure their safety throughout the visit.
- Use and wear the provided personal protective or safety equipment at all times, which may include safety boots, hardhat, high visibility apparel, and others as required.
- Obey all posted safety signs and warning notices.
- Follow all verbal safety instructions from escorts, supervisors, and other Govan Brown officials or authorized personnel.
- Notify your host if you require special assistance during an emergency evacuation.
- Refrain from touching or attempting to operate any machine, device, or equipment.
- Refrain from distracting workers operating machines, devices, or equipment or engaging in safety-related functions like traffic control.
- Avoid pranks, horseplay, contests, feats of strength, running, rough and boisterous conduct.
- Stay out of restricted areas.
- Immediately report all injuries or problems, no matter how minor.
- If a visitor refuses to follow any policies and/or procedures directed by their host:
  - Ask the visitor to leave.
  - Report the incident to their supervisor.
- Visitors must leave through the same reception area they entered and log out.

## PROCEDURE

Govan Brown is committed to ensuring compliance with applicable Occupational Health and Safety (OHS) legislation and other relevant requirements. This procedure outlines the measures and steps taken by Govan Brown to achieve and maintain compliance.

### Methods for Compliance Monitoring

Govan Brown utilizes various methods to monitor compliance with OHS legislation and other relevant requirements. This involves both proactive and reactive monitoring methods to effectively monitor compliance with OHS legislation and other relevant requirements.

#### Proactive Monitoring:

**Regular Audits:** Govan Brown conducts scheduled audits to systematically review compliance with OHS legislation and other requirements. Audits involve a comprehensive assessment of processes, procedures, and workplace conditions to identify any areas of non-compliance or opportunities for improvement.

**Regular Inspections:** Regular inspections are conducted to assess the physical conditions of the workplace, equipment, and work practices. Inspections help identify hazards, non-compliance issues, and opportunities for improvement.

**Self-Assessments:** Govan Brown promotes a culture of self-assessment, where workers and supervisors actively participate in identifying and reporting non-compliance issues or potential hazards. This includes self-audits and self-inspections to address non-compliance at the individual level.

#### Reactive Monitoring:

**Incident Investigations:** Whenever incidents occur, Govan Brown conducts thorough investigations to determine the root causes and contributing factors. This helps identify any non-compliance issues and allows for corrective actions to be implemented.

**Enforcement Authority Notifications:** Govan Brown promptly addresses any notifications received from enforcement authorities, such as the Ministry of Labour, regarding non-compliance issues. These notifications may include orders, citations, or recommendations for improvement.

**Non-Compliance Reporting:** Govan Brown establishes reporting mechanisms to encourage workers to report non-compliance issues, potential hazards, or concerns. These reports are promptly investigated and appropriate actions are taken to address the reported issues.

### Document Management and Recordkeeping

Govan Brown maintains an effective document management system to ensure compliance with legislation, regulations, standards, and other requirements. This system includes the regular review and update internal reference documentation and list of applicable legislation to reflect any changes in the legal or regulatory landscape.

Additionally, Govan Brown maintains accurate records of compliance evaluations, training activities, and incidents or corrective actions taken. These records serve as evidence of the organization's commitment to compliance and can be used for reference and future evaluations.



By effectively managing documents and maintaining comprehensive records, Govan Brown ensures that up-to-date information is available and that evidence of compliance is readily accessible. This contributes to the organization's ongoing compliance efforts and supports the maintenance of a safe and compliant work environment.

### **Visible Posting of Legislation**

Govan Brown ensures the relevant OHS legislation is visibly posted or made readily available at each workplace as required. This ensures that workers have easy access to the information and can refer to it as needed.

### **Training and Education**

Govan Brown ensures that all workers and supervisors are trained on their rights and responsibilities and how to exercise them. This includes completing the mandatory Ministry of Labour, Training and Skills Development (MLTSD) Worker/Supervisor Health and Safety Awareness training. The organization provides ongoing training and education to employees, supervisors, and managers regarding their roles and responsibilities in relation to legislative requirements.

### **Compliance Evaluation and Corrective Action**

Govan Brown conducts regular evaluations of compliance to assess adherence to OHS legislation and other requirements. These evaluations may include internal audits, inspections, or assessments and are conducted at planned intervals to monitor ongoing compliance. In addition, Govan Brown recognizes the importance of reactive monitoring when non-compliance issues are identified by the enforcement authority, such as the Ministry of Labour, who may issue non-compliance orders.

When a non-compliance order is issued, Govan Brown investigates the root causes and implements corrective measures. The organization communicates the order to stakeholders and ensures timely compliance. Non-compliance incidents are seen as opportunities for improvement. Govan Brown analyzes them, identifies weaknesses, and develops preventive measures. Lessons learned are integrated into training, policies, and procedures.

If deficiencies or non-compliance issues are found during evaluations, Govan Brown develops corrective action plans. These plans outline the necessary steps to rectify the issues and ensure compliance. Responsibilities, timelines, and progress are monitored. This demonstrates the organization's commitment to continuous improvement and a safe work environment.

By combining compliance evaluation and corrective action, Govan Brown promptly addresses non-compliance and prevents future occurrences. This proactive approach maintains high compliance levels and fosters a culture of improvement and accountability.

### **Monitoring and Communication**

Govan Brown continuously monitors changes in legislation, regulations, standards, and industry best practices to ensure ongoing compliance.

Govan Brown recognizes the importance of effectively communicating updates and changes in legislation, regulations, standards, and industry best practices to workers. This ensures that workers are informed and aware of any modifications that may impact their health and safety. The organization employs the following methods for communication:

Regular Updates: Govan Brown stays up to date with changes in legislation, regulations, standards, and industry best practices through continuous monitoring. When updates occur, the organization promptly reviews and assesses the impact of these changes on its operations.

Internal Communication Channels: Govan Brown utilizes various internal communication channels to disseminate information to workers. This may include email notifications, intranet portals, bulletin boards, newsletters, or team meetings. These channels are used to communicate updates related to legislation, regulations, and industry best practices.

Training Programs: Govan Brown incorporates updates and changes in legislation, regulations, and standards into its training programs. Workers receive regular training sessions or refresher courses to ensure they are aware of the latest requirements and practices relevant to their roles.

Awareness Campaigns: The organization conducts awareness campaigns to highlight specific changes or updates in legislation or regulations that are particularly important or have a significant impact on the workplace. These campaigns may involve posters, safety talks, or workshops dedicated to specific topics.

Collaboration with HSR/JHSC/JOHSC: Govan Brown collaborates with health and safety representatives or committees to facilitate effective communication. These representatives act as a liaison between management and workers, ensuring that information regarding updates and changes is shared and understood.

**Supervision**

Govan Brown recognizes the crucial role of supervisors in ensuring compliance. Supervisors receive the necessary knowledge, information, and training to meet legislative requirements and are responsible for overseeing compliance within their areas of authority. They actively promote and enforce safe work practices, identify hazards, and address any non-compliance issues.

**Worker Rights**

Govan Brown upholds the rights of workers as outlined in OHS legislation. This includes the right to be informed of hazards, the right to participate in health and safety matters, and the right to refuse dangerous work. The organization ensures that workers receive the necessary information, training, and support to exercise their rights. Govan Brown encourages open communication channels for workers to raise safety concerns, provides avenues for worker involvement in safety committees or representatives, and follows established procedures for addressing and resolving health and safety issues promptly.

**Progressive Disciplinary Policy**

Govan Brown applies a progressive disciplinary policy to workers not meeting legislative or company standards. This policy ensures that non-compliance is addressed appropriately and consistently, promoting a culture of compliance throughout the organization.

**Annual Performance Reviews**

Senior Management conducts annual performance reviews to assess health and safety due diligence and compliance with legislative requirements. These reviews include a comprehensive assessment of the organization's compliance efforts and adherence to applicable OHS legislation and other requirements. As part of the review process, the list of applicable legislation is thoroughly examined to ensure ongoing compliance and identify any areas for improvement. Senior Management identifies opportunities for enhancing compliance measures, implementing corrective actions, and providing additional support and resources where needed.

**COMMUNICATION**

- Govan Brown Legislation Policy and procedures located in the Govan Brown health and safety binder and be posted in the workplace H&S safety Boards.
- Govan Brown's Legislation Policy and procedures will be communicated to all new Govan Brown workers, supervisors, and managers through new employee general orientation or site-specific induction and/ or through periodic management and staff safety meetings or toolbox talk meetings.
- All existing Govan Brown staff will receive orientation through the OHS Program / Occupational Health and Safety Management System (OHSMS) orientation and /or through Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) communication and periodic management and staff safety meetings as well as through periodic and ongoing safety training, internal communication protocols or structured training sessions.
- List of applicable regulations and documentation will be kept in workplace / on project site Safety board and communicated to work parties during the safety meeting, site orientation / toolbox talks.
- This procedure will be made available at the point of use to workers, subcontractors and suppliers upon request.

**TRAINING**

- All new managers, supervisors, and workers will receive training Govan Brown Legislation Policy, Program and Procedures during their on-boarding training upon hire.
- All new employees will receive awareness training as part of their orientation on their specific health and safety roles and responsibilities through the new hire orientation process.
- All existing employees will receive training on their health and safety roles and responsibilities through periodic staff OHS Program / Occupational Health and Safety Management System (OHSMS) orientation safety meetings as well as through periodic and ongoing safety training or structured training sessions.
- Verification of training will be confirmed via sign off and may include knowledge verification testing.

**EVALUATION**

- Legislation Policy, program and procedures will be reviewed on annual basis by Senior Management and /or during the annual OHS Program / Occupational Health and Safety Management System (OHSMS) internal audit and maybe changed due to business needs, any legal requirements and based on the results of the evaluation to ensure it continues to meet OHS regulation and standards and to ensure it is relevant with current operations and any changes will be indicated in the meetings minutes or reflected on the revision page.

- The Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) / Joint Occupational Health and Safety Committee (JOHSC) and management will also be involved with the evaluation by analyzing forwarded items of concern and suggesting corrective action.
- On a yearly basis, management will review OHS Program / Occupational Health and Safety Management System (OHSMS) to assess whether it is still compliant with current regulations and with the current work environment. If necessary and if required procedure will be amended to reflect the current operation.
- After the year-end audit a thorough analysis of the gaps identified will be conducted by the Internal Auditor & Senior Management will develop an action plan that addresses the deficiencies with an overall goal of continual improvement.
- Senior Management at least annually or more often as required should review and validate company Document Control Master List with indication supporting documents needed to implement, monitor and maintain active OHS Program / Occupational Health and Safety Management System (OHSMS) effectively and assess conformance with business, corporate and legal requirements as well as compliance with applicable standards.
- Document Controller or Designee will coordinate and manage Document Control Register to ensure changes to, and current versions status of, documents are identified and tracked in order to prevent the unintended use of obsolete documents and identify such documents if they are retained for any purpose

## **REFERENCES**

Occupational Health and Safety Act R.S.O. 1990

OHS Program / Occupational Health and Safety Management System (OHSMS)

Document Control Master List

Document Control Register

List of applicable legislation

Work Refusal Form

## **OCCUPATIONAL HEALTH HAZARD ASSESSMENT, ANALYSIS AND CONTROL POLICY STATEMENT**

Hazard assessment, analysis and control process is a critical component to Govan Brown Associates Limited Occupational Health & Safety Management System. Govan Brown Associates Limited is committed to the ongoing and proactive identification of health and safety hazards, to assessing the risks associated with the hazards, and to defining and implementing controls to mitigate the risks. The goal of this program is to identify occupational health and safety hazards, 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 conducted, documented and approved for the entire scope of work performed by Govan Brown Associates Limited employees, including routine and non-routine tasks. Hazard assessments will be developed using the RACE (Recognize, Assess, Control, and Evaluate) methodology, and will be in compliance with the Occupational Health and Safety Act and all applicable regulations.

At minimum, Govan Brown Associates Limited, will:

- Perform a comprehensive occupational health and safety hazard assessment for all activities, equipment, processes and property under our control.
- Review the comprehensive occupational health and safety hazard assessment regularly to ensure its ongoing suitability for our operational needs.
- Perform task occupational health and safety hazard assessment prior to the start of any job requiring activities which are new or unusual.
- Encourage all employees to participate in the Hazard Assessment, Analysis and Control process.
- Have in place a means of reporting occupational health and safety hazards, once identified, and a method for implementing appropriate controls.

Govan Brown Associates Limited as the employer and represented by Senior Management hold the responsibility for ensuring that all Managers and Supervisors are committed to and have implemented the Hazard Assessment, Analysis and Control Procedure which involves the ongoing development and maintenance of the systematic process for the identification and control of occupational health and safety hazards.

The Occupational Health Hazard Assessment, Analysis and Control Policy and Program procedural framework will be reviewed by senior management at least annually or more frequently as required.

Senior management will ensure that hazard assessments are developed using a team-based approach which will include the involvement of workers and/or workers Health and Safety representatives, joint health and safety committees, supervisors and management with additional technical support, engineering expertise, maintenance /suppliers input as required.

Occupational health and safety hazard assessments will be maintained and updated when required, to reflect process changes and re-approved as appropriate with retention of documented records of the review.

All employees will be informed of the occupational hazards and control strategies that pertain to their tasks will be communicated accordingly. Records of communication and/or training on occupational health and safety hazard assessments shall be retained.



March 22/24

Colin Gray

Date

President – Govan Brown Associates Limited

## OCCUPATIONAL HEALTH PROGRAM & PROCEDURE

### PURPOSE

As a commitment to provide a safe and healthy workplace Govan Brown developed occupational health program and procedural framework with intention to recognize occupational health risks in the workplace and provide guidelines on controls to mitigate occupational health hazards and effectively ensure occupational health, safety and hygiene are initiated and maintained in the workplace to prevent occupational illness and injuries.

### SCOPE

This program and framework apply to all of Govan Brown workplaces and operations within the province of Ontario ensuring that company, subcontractor and work parties' requirements are fulfilled with regards to identified health hazards and designated substances where there are risks of occupational health hazards.

### DEFINITIONS

**Hazardous Products Act / Hazardous Products Regulations:** The Hazardous Products Regulations (HPR) are Canadian federal regulations enabled by the Hazardous Products Act (HPA) and part of the national Workplace Hazardous Materials Information System (WHMIS 2015). The HPR applies to all suppliers (importers or sellers) in Canada of hazardous products intended for use, handling or storage in Canadian work places. The regulations specify the criteria for classification of hazardous products and information which must be included on labels and Safety Data Sheets (SDS's).

**Hazardous product:** a product, mixture, material or substance that meets the criteria to be classified in one or more of the hazard classes of the Hazardous Products Regulations (Canada).

**Label:** a group of written, printed or graphic information elements that relate to a hazardous product. The label is to be affixed to, printed on or attached to the hazardous product or the container in which the hazardous product is packaged.

**Manufacturer:** a supplier who, in the course of business in Canada, manufactures, produces, processes, packages or labels a hazardous product and sells it.

**Supplier:** a person who, in the course of business, sells or imports a hazardous product.

**Pictogram:** a graphical composition that includes a symbol along with other graphical elements, such as a border or background colour.

**Hazard Information:** information on the proper and safe use, storage and handling of a controlled product and includes information relating to the toxicological properties of the controlled product.

**Hazard statement:** a required phrase assigned to a category or subcategory of a hazard class that describes the nature of the hazard presented by a hazardous product.

**Safety Data Sheet (SDS):** a document that contains specified, required information about a hazardous product, including information related to the hazards associated with any use, handling or storage of the hazardous product in a work place.

**Signal word:** in respect of a hazardous product, the word "Danger" or "Warning" that is used to alert the reader of the product label or SDS to a potential hazard and to indicate its severity.

**Significant New Data:** new data regarding the hazard presented by a hazardous product that change its classification in a category or subcategory of a hazard class, or result in its classification in another hazard class, or change the ways to protect against the hazard presented by the hazardous product.

**WHMIS:** stands for Workplace Hazardous Materials Information System and is Canada's national hazard communication system for hazardous products in the work place. It applies to suppliers, importers, and distributors of hazardous products that are sold in or imported into Canada and intended for use, handling or storage in Canadian work places, as well as to the employers and workers who use those products.

On February 11, 2015, the Government of Canada published the Hazardous Products Regulations (HPR), which, in addition to the amendments made to the Hazardous Products Act (HPA), modified WHMIS 1988 to incorporate the GHS for workplace chemicals. This modified WHMIS is referred to as WHMIS 2015.

**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.

## ROLES AND RESPONSIBILITIES

### MANAGEMENT

- Provide information, training, instruction and supervision to workers exposed to a hazardous biological, chemical, physical agents and designated substances or to other safety hazards with potential risk to workers health and safety.
- Carry out occupational health and safety hazard assessments of the workplace and determine the risk that workers will be exposed to hazardous biological, chemical or physical agents and develop measures for controlling worker exposure.
- Ensure occupational health and safety hazard assessments completed as aligned with Hazard Recognition and Control Policy and procedure for identifying and controlling occupational health hazards.
- Effectively initiate and monitor site-specific controls as determined by occupational health and safety hazard assessments by means of documentation of inspection.
- Where workers are exposed to hazardous biological, chemical or physical agents, and it is not possible to control exposure by means such as substituting a safer material, or re-designing the work process, the employer will ensure the use of appropriate personal protective equipment.
- Ensure that workers are provided with the necessary equipment, materials and protective devices as prescribed.
- Ensure that the equipment, materials and protective devices provided are maintained in good condition and are used as prescribed.
- Ensure that Safety Data Sheets (SDS's) are maintained and readily available to workers.
- Ensure that workers receive annual WHMIS training.
- Instruct workers on the safe handling procedures and proper hygiene techniques to minimize contact with chemical or biological hazards.
- Outline Action Plan related to Occupational Health component, where deficiencies are identified.

### SUPERVISORS

- Conduct occupational health and safety hazard assessments as per Hazard Recognition and Control Policy and procedure for identifying and controlling occupational health hazards.
- Take the necessary steps to control identified occupational health hazards and implement corrective actions to minimize risk related to each hazard.
- Identify controls and communicate hazard, risk and adequate control measures to workers.
- Ensure workers are provided with and are wearing the necessary PPE when exposed to occupational health hazards.
- Ensure that SDS's are maintained and available to workers.
- Ensure that workers complete annual WHMIS training.
- Ensure adequate toilet and wash-up facilities are available.
- Ensure adequate drinking water is available to all workers.

### WORKERS

- Report all occupational health hazards and illnesses to supervisor.
- Wear the personal protective equipment, as required by the employer or supervisor to be worn, in order to minimize exposure to occupational health hazards.
- Ensure understanding, acknowledgement and compliance of Govan Brown ' Health and Safety Policies and Procedures including site-specific requirements.
- Be familiar with the hazards, safe handling and storage instructions, and emergency procedures of a product before starting to use it.
- Use a product the way the manufacture intended.
- Know the location of SDS, and participate in WHMIS training.
- Comply with all applicable Occupational Health policies and procedures.

### HEALTH & SAFETY REPRESENTATIVE / JOINT HEALTH & SAFETY COMMITTEE MEMBER

- To work with supervisors and management to identify and control hazards in the workplace through the hazard assessment process.
- To participate in the development of hazard assessments and follow established safe work practices and safe job procedures.
- To participate in review existing job description and physical demands analysis with the site manager and supervisor.
- To immediately implement any possible controls to mitigate against risk based on risk rating level.
- To assist management to implement the action plan to mitigate identified hazard risk factors.
- To forward any hazard reports to management.
- Understand, review, and sign off on hazard assessments given by management or supervisor.
- Follow hazard control measures identified for their work.
- Review each hazard risk assessment with the supervisor and site manager.

### CONTRACTOR/SUBCONTRACTOR

- Conduct occupational health and safety hazard assessments for identifying and controlling occupational health hazards.
- Take the necessary steps to control identified occupational health hazards and implement corrective actions to minimize risk related to each hazard.
- Identify controls and communicate hazard, risk and adequate control measures to workers.
- Monitor and ensure the effectiveness of implemented controls.
- Ensure that there is an adequate drinking water and washroom facility available for all workers.
- Be familiar with the hazards, safe handling and storage instructions, and emergency procedures of a product before starting to use it.

### PROCEDURE

Govan Brown occupational health program primarily concerned with the recognition, assessment and control of work-related health hazards that may cause sickness, compromised well-being, or discomfort. The effects of exposure to health hazards may be serious and immediate or cause long-term problems.

Govan Brown developed and implemented framework and arrangements for workers and supervisors to readily identify hazards or potential hazards and determine the appropriate methods of protection.

**Hazard Recognition:** is a skill used by a trained individual who has the knowledge to make this determination. This could include trained workers, supervisors, members of a joint health and safety committee, or a health and safety professional. Whether identified or merely suspected, the objective is to anticipate hazards before they cause harm or damage.

**Hazard assessment** is the process where you identify hazards, analyze or evaluate the risk associated with that hazard and determine appropriate ways to eliminate or control the hazard.

### OCCUPATIONAL HEALTH HAZARD ASSESSMENT

Hazard Risk assessments are a systematic method of identifying workplace hazards and evaluating the risk they pose to workers. The purpose of a hazard risk assessment is to make recommendations to eliminate or reduce the risk that a hazard poses to workers.

Hazard risk assessments are conducted on hazards that arise out of the job processes or methods used within the workplace using the RACE (Recognize, Assess, Control, Evaluate) methodology.

Evaluation of job processes conducted only on work that is within the normal scope of daily work and is done only on work that follows established safe work procedures and/or legislated and regulated requirements.

Govan Brown has 3-tier(s) Hazard Risk Assessment process in place and this process include the following:

- Development & Maintenance of the Company Occupational Health & Safety Risk Registry (OHS RR) that encompasses hazards identification and risk evaluation for the activities/ tasks performed by Govan Brown or its subcontractors with identification of the control measures;
- Development & Maintenance of the Company Construction Hazard Assessment (CHA) based on the identified hazards associated with project specific operations and control measures according to the risk factors;
- Perform Job Hazard Analysis / Assessment (JHA) with all relevant workplace parties and assess the hazards associated with non-routine activities and identify the control measures according to the risk factors and ensure implementation as required.

Hazard assessments should be done by a competent person or team of individuals who have a good working knowledge of the situation and work to being studied/assess. This include either on the team or as sources of information, the supervisors and workers who work with the process under review as these individuals are the most familiar with the operation.

**Hazard Control:** refers to corrective actions resulting from the risk assessment that are meant to minimize injury, reduce adverse health effects and property damage. The main ways to control a hazard include:

- **Elimination:** remove the hazard from the workplace.
- **Substitution:** substitute (replace) hazardous materials or machines with less hazardous ones.
- **Engineering Controls:** includes designs or modifications to plants, equipment, ventilation systems, and processes that reduce the source of exposure.
- **Administrative Controls:** controls that alter the way the work is done, including timing of work, policies and other rules, and work practices/ procedures such as standards and operating procedures (including training, emergency preparedness, housekeeping, and equipment maintenance, and personal hygiene practices).
- **Personal Protective Equipment:** equipment worn by individuals to reduce exposure such as contact with chemicals or exposure to noise.

In general corrective actions and controls are usually placed **at the source** (where the hazard "comes from"); **along the path** (where the hazard "travels"); **at the worker**.

Supervisor in cooperation with workers / Health and Safety Representatives shall conduct occupational health and safety hazard assessment as per Hazard Recognition and Control Policy and procedure in EL 2 to identify all occupational health hazards related to:

- chemicals (solids, liquids, gases, and aerosols such as dust, mist, vapor, liquid, smoke, or fume),
- physical hazards (heat, cold, noise, vibration, radiation),
- biological agents (molds, viruses, bee stings),
- psychosocial- stress, violence, etc.,
- ergonomic hazards (improper lifting, poor tool design, repetitive motion)
- designated substances (lead, silica, asbestos)
- handling and storage of hazardous materials, chemical spill cleanup
- confined space entry (if any)

Safe Work Practices and Safe Job Procedures will be developed based on the identified hazards together with implementation of engineering controls reduce the source of exposure if elimination or substitution is not feasible.

All workplace parties who may be exposed or encounter one of the following hazards listed above will be trained on these procedures.



## **OCCUPATIONAL HYGIENE**

### **Toilet and wash-up facilities**

Govan Brown will ensure that each workplace is maintained in a clean and sanitary condition, and in a good state of repair so as not to affect adversely the health and safety of any employee.

Good hygiene practices must be strictly followed including prohibiting eating, drinking, and smoking in the work area; requiring washing of hands before eating, drinking, or smoking.

Govan Brown will ensure that there are an adequate number of toilet and wash-up facilities provided at each workplace according to applicable legislative requirements. At minimum facilities will:

- be adequately illuminated by natural or artificial light,
- be adequately heated, if that is possible,
- be adequately ventilated, and
- afford the user privacy and protection from weather and falling objects.
- have a toilet with an open-front toilet seat,
- have a toilet paper holder and an adequate supply of toilet paper, and
- have a self-closing door that can be locked from the inside.

Single-toilet facility will be completely enclosed unless it is a portable urinal. Each single-toilet facility will be provided with its own clean-up facility.

One readily accessible clean-up facility may be provided for every two single-toilet facilities if those single-toilet facilities are located together in the same area at the project.

If it is not reasonably possible to have a wash basin with running water at a clean-up facility, both of the following shall be provided:

- A means of cleaning hands.
- An alcohol-based hand sanitizer containing a minimum of 60 per cent alcohol.

Govan Brown will ensure that toilet and wash-up facilities are kept in good repair at all times. Toilet and wash-up facilities will be maintained in a state of reasonable cleanliness and will be serviced as required.

Toilet and wash-up facilities will be also available on-site and will be operated in accordance with the applicable regulations, serviced and be maintained in a state of reasonable cleanliness.

Separate toilet facilities will be provided for male and female workers, unless the facilities are intended to be used by only one worker at a time.

Where the minimum number of toilets required at a project under regulation requirement is five or more, at least one facility at the project shall be for the use of female workers only, where reasonable in the circumstances.

If the facility is intended for use by males only or females only, it shall have a sign indicating that.

If the facility is intended for use by female workers, there shall be a disposal receptacle for sanitary napkins.

If a project is being carried out in a remote unpopulated area and it is not reasonably possible to provide toilet facilities required under regulation, other types of toilet facilities will be provided.

### **Drinking Water**

Govan Brown will ensure that an adequate supply of potable drinking water is available for workers to use. Drinking cups will be available where required, and a method of sanitation will exist.

A reasonable supply of potable drinking water shall be kept readily accessible at a workplace /project.

All water (including ice) must be taken from federal, provincial and/or local health board approved sources; otherwise testing will be required to be conducted.

Only one-use paper cups or individual/personal receptacles should be used as drinking containers and these must be stored in a clean location.

Portable water dispensers should be tightly sealed (not open-topped) and have a tap.

## WORKPLACE HAZARDOUS MATERIALS INFORMATION SYSTEM (WHMIS)

WHMIS provides workers with information about hazardous products used in the workplace. Under WHMIS, workers have the right to receive information about each hazardous product they use, handle, or store (for example, its identity, hazards, and safety precautions).

WHMIS was updated in early 2015 (WHMIS 2015) to reflect elements of a new initiative called the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) developed by the United Nations.

GHS defines and classifies the hazards of chemical products and provides health and safety information on labels and safety data sheets, or SDSs (previously called material safety data sheets or MSDSs in the original WHMIS)

The goal of WHMIS 2015 is to reduce injury and disease by communicating specific health and safety information about hazardous products to workers. Workers can use this information to reduce their exposure to hazardous products.

The exclusions under WHMIS 2015 are:

- Explosives (as defined in the Explosives Act)
- Cosmetics, devices, drugs, or foods (as defined in the Food and Drugs Act)
- Pest control products (as defined in the Pest Control Products Act)
- Consumer products (as defined in the Canada Consumer Product Safety Act)
- Wood or products made of wood
- Nuclear substances, within the meaning of the Nuclear Safety and Control Act, that are radioactive
- Hazardous waste (being a hazardous product that is sold for recycling or recovery and is intended for disposal)
- Tobacco and tobacco products (as defined in the Tobacco Act)
- Manufactured articles

Govan Brown will provide WHMIS 2015 annual education and training to all employees that will be exposed to hazardous products and maintain an accurate record of training provided to make sure all employees understand WHMIS 2015 and to cover any new material used at the worksite.

Govan Brown WHMIS 2015 education and training in consultation with Health & Safety Representatives and Joint Health & Safety Committee members will include but not limited:

- Overview of WHMIS framework and information on how it works
- The major hazards of the hazardous products in use in the workplace
- The rights and responsibilities of employers and workers
- The content required on labels and SDSs, and the significance of this information
- Hazardous products, routes of entry, toxicity concepts and terms;
- Labels– the information required, the purpose and significance of the information;
- The information on both supplier labels and workplace labels and what that information means
- Safety Data Sheets (SDS) – the information required, the purpose and significance of the information, definitions of terms, trade secret protection, exposure limits;
- The procedures required for safe use, handling, and disposal of a hazardous product
- The site- and job-specific information to employees that will cover workplace’s procedures for storage, handling, use, disposal, emergencies, spills, and what to do in unusual situations.

## LABELS

Under WHMIS 2015, hazardous products used, handled, or stored in the workplace must be labelled. Labels are the first alert to users about the major hazards of these products and they also outline the basic precautions or safety steps that should be taken.

There are two main types of WHMIS 2015 labels: **supplier labels** and **workplace labels**.

**Supplier Label:** A label provided by a supplier disclosing the information and displaying the hazard symbols referred to in paragraph 13(b) of the Hazardous Products Act (Canada). A supplier label is provided for each hazardous product by the supplier. Supplier labels will appear on all hazardous products received at a workplace in Canada. If a hazardous product is always used in its original container with a supplier label, no other label is required.

**Workplace Label:** A label that discloses a product identifier identical to that found on the material safety data sheet/safety data sheet for the hazardous product, information for the safe handling of the hazardous product, and that a safety data sheet, if supplied or produced, is available.

A workplace label is required when any of the following apply:

- A hazardous product is produced (made) at the workplace and used in that workplace
- A hazardous product is decanted (for example, transferred or poured) into another container
- A supplier label becomes lost or illegible (unreadable)

**Exceptions for workplace labels and decanted products**

Workplace labels are not needed in following specific cases.

- When a hazardous product is decanted from a container that has a supplier or workplace label on it into another container and:
  - The decanted product stays under the control of the person who decanted it, and
  - The decanted product’s name (product identifier) is marked on the container, and
  - All of the decanted product will be used during that same shift

When a worker uses the decanted product immediately and completely.

**SAFETY DATA SHEETS**

Safety data sheets (SDSs) are documents that provide information about hazardous products and advice about safety precautions.

SDS provides more-detailed hazard information about products than labels do on what the hazards of a product are, how to use the product safely, what to expect if the recommendations are not followed, how to recognize symptoms of exposure, and what to do if emergencies occur.

Worker should keep the following points in mind:

- Always be familiar with the hazards of a product before start using it.
- Look at an SDS and match the name of the product on the container to the one on the SDS
- Know the hazards
- Understand safe handling and storage instructions
- Understand what to do in an emergency

SDSs are important resources having four main purposes that help workers to learn more about the products in use.

- Identification — for the product and supplier
- Hazards — physical (fire and reactivity) and health
- Prevention — steps you can take to work safely and reduce or prevent exposure
- Response — appropriate responses in various emergency situations (for example, first aid, fire, or accidental release)

Workers should use this information to identify:

- The hazards of the products workers use
- How to protect themselves from those hazards
- Safe handling and emergency measures

SDSs are usually prepared or obtained by the manufacturer or importer of a product.

Govan Brown will ensure that all Safety Data Sheets (SDS) are maintained, readily available, and easily accessible in the workplace to all workers and emergency response personnel.

Subcontractors shall provide current SDS prior to using a hazardous product at the project site.

## SAFE USE AND STORAGE OF HAZARDOUS PRODUCTS

When a hazardous product is transferred from the supplier container to another container the proper equipment must be used. When transferring a flammable or combustible liquid from one container to another both containers must be effectively bonded and grounded to prevent discharge of sparks or static electricity, which could cause an explosion.

All packaging or storage areas for hazardous products shall be labeled and any damaged or missing labels shall be replaced immediately. It is the responsibility of the Employee to read the workplace label and wear the proper personal protective equipment as stated in SDS information.

### Compressed Gas

- All compressed gas (oxygen, acetylene, argon, nitrogen, propane) must be stored in the designated storage location. Full cylinders need to be secured with a safety chain. When moving a cylinder, the cap covering the valve must stay on until the cylinder is secured at the workstation.

### Flammable and combustible materials

- All flammable and or combustible materials must be kept away from any/all sources of ignition.
- Flammable and combustible liquids should be stored in a yellow fire-resistant cabinet. The cabinet must be self-closing so that it remains closed.
- All flammable and combustible liquid received in a 45-gallon drums must to be stored outside the building in the area assigned for this purpose.

### Spills

Prior to work with hazardous materials:

- Determine spill procedures from SDS for all chemicals.
- Anyone handling hazardous materials needs trained in spill procedures.
- Obtain proper spill kits and cleaning material.

Small spills that pose no immediate threat to health:

- Stop – Think! Do not rush.
- Notify occupants in the immediate area of the spill.
- Carefully plan cleanup. Decide if you can safely handle the spill. (If unsure call MOE at 416-325-3000).
- Eliminate all ignition sources if flammable material is involved.
- Proceed with response to the spill only if you are trained on spill response procedure.
- Use adequate personal protective equipment and use spill kits to absorb and contain according to spill response procedure.
- Carefully remove other materials from the path of the spill.
- Confine the spill to a small area. Do not allow the material to spread.
- Place material in a secure and ventilated area.
- Contact supervisor for disposal instructions.
- Clean up area of spill and dispose of chemical waste as required.

Large spills or spills that pose an immediate threat to health:

- Notify occupants in the immediate area of the spill.
- Eliminate all ignition sources if flammable material is involved.
- Initiate emergency response protocol.
- Evacuate the immediate area.
- Call your supervisor or follow emergency response contact protocol.
- Follow the instructions from Emergency Response Coordinator.

Note: Refer to Govan Brown Emergency Response Plan for more specific details.

## WASTE

Proper waste disposal procedures must be followed at all times. It is important that all waste that is disposed of done so in compliance with environmental regulations. Do not put any hazardous materials in the regular garbage or into the drains.

All unused or waste hazardous products shall be disposed of as per Federal, Provincial and Municipal by-laws.

### DESIGNATED SUBSTANCES

Worker exposure to Designated Substances must be controlled in accordance with Ontario Regulation requirements (O. Reg. 278/05).

List of Designated Substances include but not limited:

- |                       |                  |
|-----------------------|------------------|
| • Acrylonitrile       | • Lead           |
| • Arsenic             | • Mercury        |
| • Asbestos            | • Silica         |
| • Benzene             | • Vinyl chloride |
| • Coke oven emissions | • Ethylene oxide |
| • Isocyanates         |                  |

**Note:** refer to O. Reg. 490/09: Designated substances under Occupational Health and Safety Act, R.S.O. 1990, c. O.1 for more details.

Use of a subcontractor is the preferred for any of Govan Brown project site activities which may encounter any of the above designated substances (i.e., removal, abatement and disposal). Govan Brown will participate in the minimum recommendations as required by legislation and by the subcontractor performing the task.

Subcontractor will require to provide Govan Brown the project specific program and procedure for review and awareness.

Posting monitoring results if needed for designated substances.

- When required under a control program that relate to the monitoring of airborne concentrations of a designated substance and worker exposure to airborne concentrations of a designated substance, the employer shall:
  - promptly post the results in a conspicuous place or places where they are most likely to come to the attention of workers who would be affected by them and leave them posted for no less than 14 days;
  - provide a copy of the results to the joint health and safety committee; and
  - Keep the results for no less than five years.

#### Personal Protected Equipment

- Any worker who is exposed to a designated substance will be required to wear any specified specialized personal protective equipment supplied from their employer.
- An employer who provides a worker with specialized personal protective equipment shall ensure there is training and instruction to the worker in the care and use of this equipment.

#### Discovery

- In the event a designated substance is discovered after a project has commenced the worker shall notify their supervisor immediately.
- The supervisor shall inform all employees in the area to leave the area and follow first aid procedures, if necessary.
- The supervisor will ensure barricading of the designated area (i.e., danger/red tape, locking area, danger signage) and engage an appropriate to conduct analysis to confirm the designated substance and recommendations.
- It is Govan Brown ' interest to have a subcontractor specialized in handling the substance at the project site, when a designated substance is present.

### CONFINED SPACES

Requirements for confined space work included into Govan Brown safe job procedure and based on the hazard assessment and confined space regulations under Occupational Health & Safety Act, for entry into confined spaces.

Govan Brown developed and maintain confined space safe job procedure, however Govan Brown outsourcing all confined space work scopes through utilization of the 3<sup>rd</sup> party subcontractors. Govan Brown might utilize competent workers and internal resources to assist in preparation stage for performing confined space entry operations following established safe job procedure, hazard assessment and confined space regulations under Occupational Health & Safety Act, but for actual entry and work in confined spaces only competent 3<sup>rd</sup> party subcontractors will be utilized.

In case multiple confined space entry operations are planned at project site, Govan Brown will elaborate, agree and communicate with Constructor and workers the site-specific confined space entry operations protocol.

Hazard Assessment will be conducted, if confined space hazards are identified in the workplace, then measures will be followed as part of Hazard Assessment process and work in Confined Space will be conducted under the Confined Space Entry Permit.

Project site-specific methods, arrangements and controls will include but not limited verification of air quality prior to entry into confined spaces, entry permits, air and personnel monitoring while in confined spaces, ventilation, entry procedures, attendant, communication, PPE, safe retrieval, emergency rescue procedures, equipment and records.

Site-Specific Training Requirements in the procedures are required prior to conducting work in confined spaces.

In case utilization of the 3<sup>rd</sup> party subcontractors is not feasible, at least two employees will be trained on confined space entry if such hazard exists for confined space work arrangements when and as required.

#### **General Considerations for Confined Spaces**

- The proper use and enforcement of personal protective equipment.
- Any persons involved and/or in the area will have the required training.
- Workers to ensure their signs and equipment are in good order prior to starting work.
- Barriers to isolate the work area.
- Any and all workers involved to have knowledge of this plan.
- Workers to ensure there is always constant/clear communication.
- Any workers entering the space to use adequate Fall Protection Equipment and never remove harness while in shaft.
- Use of industrial size air exchanger to purge and constantly ventilate the space.
- Any tasks which can be performed outside the space will be done to reduce and/or eliminate the time spent in the space by workers.
- Minimum of 2 workers involved (one in the space and one or more to monitor and assist the worker in the space).
- Only workers authorized by the supervisor are allowed in the designated areas.

#### **COMMUNICATION**

- The Hazard Assessment, Analysis and Control Policy and Procedure as well as Occupational Health policy, program and procedural framework will be communicated to all new hired employees through new employee general orientation or site-specific induction and/ or through periodic management and staff safety meetings or toolbox talk meetings
- The Hazard Assessment, Analysis and Control Policy and Procedure as well as Occupational Health policy, program and procedural framework will be communicated to all existing employees through the OHS Program / Occupational Health and Safety Management System (OHSMS) orientation and /or through Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) communication and periodic management and staff safety meetings as well as through periodic and ongoing safety training, internal communication protocols or structured training sessions.
- The Hazard Assessment, Analysis and Control Policy and Procedure as well as Occupational Health policy, program and procedural framework is located in the Govan Brown health and safety binder.

#### **TRAINING**

- All new managers, Supervisors, and Workers will receive training in the Hazard Assessment, Analysis and Control Policy and Procedure as well as Occupational Health policy, program and procedural framework during their on-boarding training upon hire.
- All existing Managers, Supervisors and workers will receive periodic refresher training on Hazard Assessment, Analysis and Control Policy and Procedure as well as Occupational Health policy, program and procedural framework during safety training, during general safety meetings, HSR/ JHSC/JOHSC, and safety talks.
- Each worker trained on the Hazard Assessment, Analysis and Control Policy and Procedure as well as Occupational Health policy, program and procedural framework will sign off confirming their attendance and understanding.

#### **EVALUATION**

- Hazard Assessment, Analysis and Control Policy and Procedure as well as Occupational Health policy, program and procedural framework will be evaluated by review of submitted work site hazard reports, risk assessment reports, accident reports, accident trends, orientation files, JHSC/JOHSC minutes and safety audits.

- The policy will also be evaluated through the analysis and feedback from all staff in involved in the Hazard Assessment, Analysis and Control Policy and Procedure as well as Occupational Health policy, program and procedural framework and form completion.
- Compliance and efficiency of policy will be measured by looking at the following:
  - Has legislation changed? Are there new best practices in the industry?
  - Is the health and safety standard being implemented?
  - Are the health and safety goals being met?
  - Is communication about the standard, both to and from employees, clear and understood?
  - Is training to the standards being completed and are employees benefiting from it?
  - Are employees following safe work procedures?
- This procedure will be reviewed on annual basis by Senior Management and /or during the annual OHS Program / Occupational Health and Safety Management System (OHSMS) internal audit and maybe changed due to business needs, any legal requirements and based on the results of the evaluation to ensure it continues to meet OHS regulation and standards and to ensure it is relevant with current operations and any changes will be indicated in the meetings minutes or reflected on the revision page.
- The Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) and management will also be involved with the evaluation by analyzing forwarded items of concern and suggesting corrective action.
- On a yearly basis, management will review OHS Program / Occupational Health and Safety Management System (OHSMS) to assess whether it is still compliant with current regulations and with the current work environment. If necessary and if required procedure will be amended to reflect the current operation.
- After the year-end audit a thorough analysis of the gaps identified will be conducted by the Internal Auditor & Senior Management will develop an action plan that addresses the deficiencies with an overall goal of continual improvement.
- Senior Management at least annually or more often as required should review and validate company Document Control Master List with indication supporting documents needed to implement, monitor and maintain active OHS Program / Occupational Health and Safety Management System (OHSMS) effectively and assess conformance with business, corporate and legal requirements as well as compliance with applicable standards.
- Document Controller or Designee will coordinate and manage Document Control Register to ensure changes to, and current versions status of, documents are identified and tracked in order to prevent the unintended use of obsolete documents and identify such documents if they are retained for any purpose

**REFERENCE**

- Occupational Health and Safety Act R.S.O. 1990
- OHS Program / Occupational Health and Safety Management System (OHSMS)
- Document Control Master List
- Document Control Register
- Occupational Health & Safety Risk Registry (OHS RR)
- Construction Hazard Assessment (CHA)
- Job Hazard Analysis / Assessment (JHA)
- Addendum: Subcontractor Safety Package
- Addendum: Index of Safe Work Practices (SWP)
- Addendum: Index of Safe Job Procedures (SJP)

**Additional References**

- Occupational Health and Safety Act (R.S.O. 1990, c. O.1)
- WHMIS Regulation (Ontario Regulation 860)
- Control of Chemical and Biological Agents (Ontario Regulation 833)
- Confined Spaces (Ontario Regulation 632/05)

## FIRST AID POLICY STATEMENT

Govan Brown Associates Limited recognizes its obligation and responsibilities with regard to providing and maintaining first aid supplies/equipment, stations, records and training employees in all work locations and as such will meet the minimum required standards of the Workers Safety and Insurance Board (WSIB) in Ontario, Worker Compensation Board of Alberta, and WorkSafeBC in British Columbia.

Govan Brown Associates Limited is committed to ensuring that appropriate first aid is provided as quickly as possible for any injured employee. We will provide and maintain a first aid program for the purpose of minimizing the suffering related to job-related injuries and illnesses, reducing absenteeism, maintaining productivity and meeting regulatory requirements.

Govan Brown Associates Limited will provide and maintain first aid services, supplies and equipment suitable to the degree of hazards of the job, travel time to a hospital and number of employees as specified by the Workplace Safety and Insurance Board (WSIB) Regulation 1101 and Occupational Health and Safety Act (OHSA) for Ontario and OHS Alberta, and WorkSafeBC for British Columbia.

Govan Brown Associates Limited will ensure that:

- At least one person is trained, at the designated level, on every shift.
- The designated first aider is available to render assistance at all times during that shift.
- Each first aid kit is adequately stocked with supplies and regularly inspected as required.
- A copy of the WSIB's In Case of Injury poster (Form 82) is posted in the workplace, at a location where all workers can see it (Ontario), or any other applicable posters required by provincial legislations.
- First aid treatment is reported and recorded.
- Arrangements for re-certification and training sessions booking are made accordingly prior to the expiry dates of designated First Aiders certification and required training arranged through recognized and certified training provider.

Govan Brown Associates Limited, as an employer, is ultimately responsible for worker health and safety. As president, I give you my personal commitment that I will comply with my duties under the Occupational Health and Safety Act, such as taking every reasonable precaution for the protection of workers in the workplace.



March 22/24

Colin Gray

Date

President – Govan Brown Associates Limited



## **FIRST AID PROGRAM & PROCEDURE**

### **PURPOSE**

Govan Brown has outlined the First Aid Policy and procedure to ensure to protect the safety and health of employees and will ensure that any person injured or suffering an illness in the workplace will be provided the utmost care; prompt and proper first aid treatment will be administered by a competent certified first aid attendant. Govan Brown will ensure that they provide properly stocked first aid kits and will keep a record of all first aid treatment provided or advice given.

The Purpose of First Aid Policy is also to ensure Govan Brown First Aid Policy and Procedures is following WSIB Regulations and/or individual provincial first aid guidelines.

### **SCOPE**

The Scope of the policy applies to first aid equipment, materials & handling; first aid reporting and first aid treatment and applies to all Govan Brown employees.

Govan Brown specific integrated supplementary Emergency Preparedness element policy with interrelated and interacting procedures within the scope of the current OHS Program / Occupational Health and Safety Management System (OHSMS) under Element 11.

### **DEFINITIONS**

**First Aid:** First aid is emergency care given immediately to an injured person. The purpose of first aid is to minimize injury and future disability. In serious cases, first aid may be necessary to keep the victim alive. First aid incidents refer to care or treatment given immediately by a qualified first aider to an ill or injured person who does not require treatment from a healthcare professional. Treatment for first aid incidents includes cleaning minor cuts, scrapes or scratches, treating a minor burn, applying bandages or dressings, cold compress, cold packs, ice bags, and splints.

## **ROLES & RESPONSIBILITIES**

### **FIRST AIDERS**

- Provide First Aid to injured persons and ensure that such injuries are recorded in a First Aid logbook.
- Ensure an injury package is taken by injured workers seeking medical, containing the functional abilities form and an injury report form that may be filled out as appropriate.
- Attend formal First Aid training and refresher courses from approved organizations recognized by WSIB in the First Aid Regulation.

### **MANAGEMENT**

- Provide adequate resources for staff to be trained in First Aid as required by this Standard.
- Ensure training is provided to designated First Aiders by a recognized training providers and re-certification process maintained and followed.
- Maintain a First Aid station containing a First Aid box (containing the items required by the First Aid Regulation), valid First Aid certificates of trained workers, and an inspection card recording the date of the most recent inspection of the First Aid box and the signature of the person making the inspection.
- Provide immediate transportation to a medical facility or the worker's home, as appropriate.
- Monitor and evaluate this policy and standards on a scheduled basis.

### **SUPERVISORS**

- Ensure all staff are trained & orientated regarding the First Aid Policy & procedures
- 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.
- Ensure that sufficient staff is trained and holds a valid First Aid certificate.
- Monitor compliance of this policy.

**WORKERS**

- Report the injury-causing incidents to supervisor or employer immediately.
- Report all workplace injuries to supervisor. If you require treatment from a health professional (beyond first aid), you must notify your employer or supervisor so that they can report it to WSIB and ensure that the Incident Investigation report is completed.
- If you subsequently lose time from work (i.e., you are not feeling well the day following the injury or illness and you choose to stay home because of the injury or illness), you must report your injury or illness to the WSIB.
- Inform the employer of any injury or the possible onset of work-related disease/condition.
- Cooperate in safe return to work.

**CONTRACTOR/SUBCONTRACTOR**

- Provide adequate resources for staff to be trained in First Aid as required by this Standard.
- Maintain a First Aid station containing a First Aid box (containing the items required by the First Aid Regulation), valid First Aid certificates of trained workers, and an inspection card recording the date of the most recent inspection of the First Aid box and the signature of the person making the inspection.
- Provide immediate transportation to a medical facility or the worker's home, as appropriate.
- Monitor and evaluate this standard on a scheduled basis.
- Ensure all Contractor/Subcontractor staff are trained & orientated with regard to the First Aid Policy & procedures
- Maintain contact with injured workers after they have sought medical
- Identify First Aid training requirements.
- Ensure that sufficient staff is trained and holds a valid First Aid certificate.

**PROCEDURE**

Each Govan Brown site will ensure to have minimum 1 (one) first aid attendants per shift working near the first aid kit or station.

During extra scheduled hours, there must be at a minimum 1 (one) first aider on site.

Govan Brown will ensure all offsite workers will maintain a basic first aid kit in their vehicle at all times. Each first aid station (kit) will include items as per applicable first aid regulations.

Each site Health & Safety Board will have the certified first aiders for the site posted.

Each individual first aid kit will be inspected monthly ensuring the contents meet the outlined requirements per applicable first aid regulations

A record of inspection shall be kept including the date of inspection and signature of inspector.

Storage of supplies shall be kept in (room) at each site. There will be a first aid log included with each first station.

Govan Brown senior management will ensure that designated First Aiders are recertified every 3 years and that all training records for designated First Aiders are retained in centralized database and tracked through the Govan Brown Training Matrix with notification and indication of the upcoming expiry date in advance.

Arrangements for re-certification and training sessions booking will be made accordingly prior to the expiry dates of designated First Aiders certification and required training arranged through recognized and certified training provider.

**PROCEDURE IN THE EVENT OF AN INCIDENT**

Report the injury-causing incidents to supervisor or employer immediately. The nearest First Aider is to be immediately notified. The First Aider must then decide, after assessing the situation, whether to;

- Provide First Aid to the injured person
- Contact management
- Determine based on severity to:
  - Arrange taxi to transport to a medical center
  - Call ambulance service to transport to Hospital

## **GUIDELINES**

In the event of an injury/incident where a worker has been provided first aid yet require medical attention for minor stitches; or the injured worker requests to seek further medical after first aid treatment Govan Brown will arrange transportation to a medical clinic.

Govan Brown will call emergency services for the following incidents:

- Any fracture injury
- Significant head trauma
- Loss of consciousness
- Significant loss of blood
- Significant burn to a major portion of the body
- Loss of sight in an eye
- Amputation
- In case placing life in jeopardy

Note: The above are guidelines yet as noted it is the certified first aid responder's duty to assess during treatment and make a decision based on the guidelines.

If the decision is made that emergency services are required the first aider should:

- Clearly state the exact location, number of casualties, suspected condition of casualty, and potential hazards.
- Delegate a person to get the injured employee's Health Card and personal belongings.
- Delegate a person to meet emergency service and direct them to the injured person.

If the injured person refuses the ambulance, then the employer should reiterate the importance of accepting the transportation to the hospital medical facility and contact emergency services anyway as the Emergency Medical Technician (EMT) can assess & address the worker.

If it is judged the emergency services are not required but that a visit to the medical clinic or hospital is needed, then the injured person shall be transported via taxi as noted.

The First Aider shall make all reasonable attempts to inform employee's emergency contact only if the employee is being hospitalized.

- All first-aid treatments should be recorded by completing the First aid injury log kept in each first aid kit and maintained along with all other First Aid records for a period suitable to the employer but not less than 7 years
- First Aid Inspection Card should be posted in the First Aid kits/room

## **REPORTING REQUIREMENTS**

The First Aid Attendant will be required to record in the First aid injury log, all first aid treatment given to an employee. Should the injury/illness be serious enough that medical attention is required; an injury/illness incident report shall be completed and a copy provided to the Manager. The injury/illness incident report shall record the circumstances surrounding the incident as described by the injured employee. Specifically, the report must include:

- the date of the injury
- time of the injury
- the names of witnesses
- the nature and
- exact location of the treatment given.

## **INSPECTION REQUIREMENTS**

Monthly as part of the Govan Brown inspection form, Health and Safety Representative (HSR) / the worker representative of the Joint Health & Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) shall inspect the First Aid Kit and the equipment in the First Aid Station to ensure that the kit is adequately stocked with supplies, that the stretcher and blanket are present (where required), and that a sufficient number of injury/illness incident forms are supplied.

If there are any supplies or deficiencies identified, it will be noted on the Monthly Inspection Record and the first aid kit will be restocked within a reasonable time (no later than one week). The inspection schedule and person responsible shall be defined according to the inspection schedule determined by Govan Brown and agreed by the Joint Health & Safety Committee with arrangements to conduct inspection at least once a month.

## **TRANSPORTATION**

Supervisor at the sites and project manager will ensure that a vehicle is available at all times for transporting any injured worker to a medical facility.

## COMMUNICATION

- Govan Brown Emergency Preparedness as well as First Aid policy and procedural framework and Emergency Response Plan located in the Govan Brown health and safety binder and be posted in the workplace H&S safety Boards.
- Govan Brown's Emergency Preparedness as well as First Aid policy and procedural framework and Emergency Response Plan will be communicated to all new Govan Brown workers, supervisors, and managers through new employee general orientation or site-specific induction and/ or through periodic management and staff safety meetings or toolbox talk meetings.
- All existing Govan Brown staff will receive orientation through the OHS Program / Occupational Health and Safety Management System (OHSMS) orientation and /or through Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) communication and periodic management and staff safety meetings as well as through periodic and ongoing safety training, internal communication protocols or structured training sessions.
- Project sites might have specific Emergency preparedness arrangements (including Emergency Contact Numbers, Map to the nearest hospital, site specific Emergency Response procedures etc.).
- Current Emergency Preparedness as well as First Aid policy and procedural framework and Emergency Response Plan and documentation will be kept in workplace / on project site Safety board and communicated to work parties during the safety meeting, site orientation / toolbox talks.
- This procedure will be made available at the point of use to workers, subcontractors and suppliers upon request.
- First Aid Policy and procedures will be posted in a conspicuous space in the workplace where it will be accessible by all employees. First Aid Inspection Card should be posted in the First Aid kits/room
- The Following documents will also be posted:
  - Copy of the First Aid Regulation
  - Copy of the WSIB Form 82 ("In Case of Injury at Work" poster) at all First Aid station/rooms and in other conspicuous places in the workplace
  - Copy of the content kit should be in or near by the First Aid kit/room
  - Copy of valid First Aid certificates including the names of designated First Aiders at each first aid location

## TRAINING

- All new employees will receive awareness orientation with regard to the emergency preparedness and first aid policy and procedural framework through the new hire orientation process. All existing employees will receive training on the policy through the safety manual training, through periodic safety meeting and formal safety training sessions.
- Employees at the office and shop will be trained in the emergency response plan as well as in emergency preparedness and first aid policy and procedural framework during their orientation. Employees on site will be trained in the emergency response plan during their site orientation.
- Additional and or specific training may be provided as part of fire drill/mock evacuation
- At least one employee from each work area per shift will receive First Aid/CPR training in accordance with the recommendations provided by St. John Ambulance 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.
- Verification of training will be confirmed via sign off and may include knowledge verification testing.
- Govan Brown offers First Aid training as outlined in this policy. Any employee interested in participating and obtaining First Aid certification shall speak to their immediate Supervisor or Manager.
- All designated First Aiders and field representative shall be trained and certified from a WSIB-recognized training provider every 3 year.
- All training records for designated First Aiders will be retained and tracked through the Govan Brown Training Matrix with notification and indication of the upcoming expiry date in advance.

## **EVALUATION**

- Emergency Preparedness as well as First Aid policy and procedural framework and Emergency Response Plan will be reviewed on annual basis by Senior Management and /or during the annual OHS Program / Occupational Health and Safety Management System (OHSMS) internal audit and maybe changed due to business needs, any legal requirements and based on the results of the evaluation to ensure it continues to meet OHS regulation and standards and to ensure it is relevant with current operations and any changes will be indicated in the meetings minutes or reflected on the revision page.
- The Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) and management will also be involved with the evaluation by analyzing forwarded items of concern and suggesting corrective action.
- On a yearly basis, management will review OHS Program / Occupational Health and Safety Management System (OHSMS) to assess whether it is still compliant with current regulations and with the current work environment. If necessary and if required procedure will be amended to reflect the current operation.
- After the year-end audit a thorough analysis of the gaps identified will be conducted by the Internal Auditor & Senior Management will develop an action plan that addresses the deficiencies with an overall goal of continual improvement.
- Senior Management at least annually or more often as required should review and validate company Document Control Master List with indication supporting documents needed to implement, monitor and maintain active OHS Program / Occupational Health and Safety Management System (OHSMS) effectively and assess conformance with business, corporate and legal requirements as well as compliance with applicable standards.
- Document Controller or Designee will coordinate and manage Document Control Register to ensure changes to, and current versions status of, documents are identified and tracked in order to prevent the unintended use of obsolete documents and identify such documents if they are retained for any purpose

## **ACKNOWLEDGEMENT AND IMPROVEMENTS**

- Any substandard condition or substandard First Aid policy and procedural framework will be addressed / corrected within a week by senior management.
- Senior management will acknowledge success by writing an email memo and posting it to communicate it to the all employees congratulating them on their success relating this standard.
- After review of the standard; and first aid injury tracking to monitor the success of the policy & procedures identifying any gaps; The Manager and senior management will develop an action plan to address identified gaps and areas of improvement.

## **REFERENCE**

Occupational Health and Safety Act R.S.O. 1990

OHS Program / Occupational Health and Safety Management System (OHSMS)

Document Control Master List

Document Control Register

Emergency Response plan

First Aid Injury Treatment Log

First aid kit checklist

### **Additional References**

Workplace Safety and Insurance Board (WSIB) Regulation 1101

Workplace Safety and Insurance Act

WSIB Form 82 ("In Case of Injury at Work" poster)

**HEALTH & SAFETY REPRESENTATIVES (HSR) AND JHSC/JOHSC POLICY STATEMENT**

Govan Brown Associates Limited's senior management recognizes that one of the basic rights of all workers is to participate in matters affecting workplace health and safety and is committed to work jointly with relevant personnel in the development and implementation of the Health and Safety Program.

By allowing input from all parties and encouraging consensus resolutions, Health and Safety Representative (HSR) and/or Joint (labour and management) Health and Safety Committees (JHSC)/Joint Occupational Health and Safety Committee (JOHSC) members are able to participate in all aspects of the health and safety program. An effective health and safety program must have the support of all workplace parties in pursuit of a common objective, which is the well-being of all personnel at the jobsite.

It is in the best interest of all parties to consider health and safety in every activity. Commitment to health and safety must form an integral part of our organization, from the president to the workers. Govan Brown Associates Limited senior management is committed to work jointly with relevant personnel in the development and implementation of the Health and Safety Program.

Govan Brown Associates Limited's vision and training and communication policy and procedural framework is also aiming to:

- Provide information, training and instruction to workers to protect their health or safety;
- Promotes positive attitudes and a improve safety culture;
- Reduce accident severity and frequency as well as injury and ill-health related absence;
- Reduce compensation claims and, possibly, insurance premiums;
- Improve staff morale and retention as well as corporate reputation;

Govan Brown Associates Limited, as an employer, is ultimately responsible for worker's health and safety and recognizes the right of workers to work in a safe and healthy workplace.

As president, I give you my personal commitment that I will comply with my duties under the Occupational Health and Safety Act, such as taking every reasonable precaution for the protection of workers in the workplace



March 22/24

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Colin Gray

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Date

President – Govan Brown Associates Limited

## **HEALTH & SAFETY REPRESENTATIVES (HSR) AND JHSC/JOHSC PROGRAM & PROCEDURE**

### **PURPOSE**

One of the basic principles of the Occupational Health and Safety (OH&S) Act & Regulations is the right of all workers to participate in matters affecting workplace health and safety. One provision of the Act that makes this involvement possible is the requirement for a health and safety representative or joint (labour and management) health and safety committee (JHSC)/Joint Occupational Health and Safety Committee (JOHSC). By allowing input from all parties and encouraging consensus resolutions, the JHSC members are able to participate in all aspects of the health and safety program. The support of all parties in the workplace for a common objective, the well-being of all personnel, is absolutely necessary to ensure an effective health and safety program.

A Joint Health and Safety Committee (JHSC)/Joint Occupational Health and Safety Committee (JOHSC) is a forum for bringing the internal responsibility system into practice. The committee consists of labour and management representatives who meet on a regular basis to deal with health and safety issues. The advantage of a joint committee is that the in-depth practical knowledge of specific tasks (labour) is brought together with the larger overview of company policies, and procedures (management). Another significant benefit is the enhancement of cooperation among all parts of the work force toward solving health and safety problems.

The established Joint Health and Safety Committee (JHSC)/Joint Occupational Health and Safety Committee (JOHSC) aimed to:

- Create and maintain active interest in health and safety and to reduce incidents.
- Discuss and recommend effective actions to prevent workplace incidents/accidents, injuries and illness.
- Promote an awareness of health and safety issues and an atmosphere of cooperation between management and workers.
- Help in identifying problems, formulating policy and procedures, monitoring and improving workplace health and safety.

Govan Brown is committed to provide a healthy and safe working environment for all of its employees. We strongly believe and are committed to working cooperatively with our employees. We believe that jointly we should strive to consistently manage and improve our health and safety system to ensure our employees understand safe work practices and procedures to work safe.

It is part of Govan Brown mandate to achieve these goals and further them through the work of the Health & Safety Representatives (HSR) designated at workplace and the Joint Health & Safety Committees (JHSC)/Joint Occupational Health and Safety Committee (JOHSC) where applicable.

The JHSCs/JOHSCs as documented in Occupational Health and Safety (OH&S) Act & Regulations will act also as an advisory group made up of employee and management representatives whom together will identify health & safety issues and recommend solutions to address the identified deficiencies.

Govan Brown committees will be formed to support the general goals of the Health & Safety System and to play a key role in helping to maintain effective system. Committees provide a forum for management and workers to cooperate in identifying and resolving individual site health and safety problems. Safety committees are to provide a good example for the rest of the Govan Brown work force and assist in safety promotion.

### **SCOPE**

Where established joint committee exists, it shall operate in accordance with this document and legislative requirements and whenever possible committee will represent the health and safety concerns of the entire workplace.

Health & Safety Representatives (HSR) /JHSC/JOHSC policy and procedures will be applicable to all Govan Brown sites and office locations and include:

- Roles and responsibilities for Govan Brown based on company requirements for Health and Safety Representative (HSR), Joint Health and Safety Committee (JHSC)/Joint Occupational Health and Safety Committee (JOHSC) and/or Worker Trade Committee (WTC).
- Composition and selection of HSR and/or JHSC and/or JOHSC and/or WTC members.

## ROLES AND RESPONSIBILITIES

### MANAGEMENT

- Ensure that a JHSC/JOHSC is established or H&S Representative has been elected where required by legislation.
- Assist and support the JHSC/JOHSC and H&S Representative to carry out their functions.
- Provide such information, time and assistance as the committee or representative may require for the purpose of carrying out their duties.
- Upon request of the JHSC/JOHSC and H&S Representative provide:
  - Information regarding the identification of potential or existing hazards involving materials, process or equipment.
  - Information about health and safety experience and work practices and standards in similar or other industries of which the constructor or employer has knowledge.
  - A copy of all orders or reports issued to the employer by an inspector of the Ministry of Labour.
  - The JHSC/JOHSC and H&S Representative with the opportunity to accompany a Ministry of Labour inspector on the physical inspection of the workplace.
  - Information and assistance the JHSC/JOHSC or H&S Representative required for purposes of inspecting the workplace.
  - Advise the JHSC/JOHSC and H&S Representative of the results of the assessment or reassessment of the risk of workplace violence and provide it with a copy of the assessment in writing.
  - Any other information where prescribed.
- Provide a written response to the JHSC/JOHSC or H&S Representative's recommendations within 21 calendar days.
- Report any workplace deaths, injuries, and illnesses to the JHSC/JOHSC or H&S Representative.
- Consult with the JHSC/JOHSC or H&S Representative on the development of health and safety programs and policies (including training programs), where prescribed.

### SUPERVISORS

- Ensure that a JHSC/JOHSC is established or H&S Representative has been elected where required by legislation.
- Provide the necessary support and resources to assist the JHSC/JOHSC or H&S Representative in performing their functions and duties.

### WORKERS

- Report any hazards or safety concerns to the JHSC/JOHSC or H&S Representative, as necessary.
- Participate or be a part of the JHSC/JOHSC or H&S Representative member selection process.
- Provide information and assistance as may be required by a JHSC/JOHSC or H&S Representative conducting an inspection or investigation.
- Not interfere or knowingly provide a JHSC or H&S Representative with false information.

### JOINT HEALTH AND SAFETY COMMITTEE / H&S REPRESENTATIVE

- Carry out their functions and duties, as outlined in this policy and as required by the Occupational Health and Safety Act.
- **Specific to Province of Alberta:** Allow workers to participate in occupational health and safety and support the 3 basic rights of workers: the right to know, the right to participate, and the right to refuse dangerous work.
- Assist Senior Management of Employer/Constructor to:
  - Recognize workplace hazards. Participate in the employer's hazard assessment.
  - Evaluate the hazards and risks that may cause incidents, injuries and illness.
  - Participate in development and implementation of programs to protect the employees' safety and health, including policy and procedure review
  - Respond to employee complaints and suggestions concerning safety and health. Ensure that all reports are escalated to the employer or management. The employer (management) must provide a written response to any recommendations to the JHSC/JOHSC or HSR within 21 days.



- The receipt, consideration, and disposition of concerns, complaints, and suggestions concerning the safety and health of workers.
- Ensure the maintenance and monitoring of injury and work hazard records.
- Monitor and follow-up hazard reports and recommend action.
- Set up and promote programs to improve employee training and education.
- Participate in safety and health inquiries and investigations, as appropriate.
- Consult with professional and technical experts.
- Participate in resolving workplace refusals and work stoppages.
- Make recommendations to management for incident prevention and safety program activities.
- Make recommendations to the employer respecting the health and safety of workers.
- Review the employer's work site inspection
- Monitor effectiveness of safety programs and procedures.

**PROCEDURE**

**HEALTH AND SAFETY REPRESENTATIVE (HSR)**

A Health and Safety Representative is required:

- At a project or other workplace where no committee is required under Section 9 of the OHS Act and where the number of workers regularly exceeds five to 19, 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. The term of office would be one year.

**Selection of Health and Safety Representative**

- The selection of a Health and Safety Representative shall be made by those workers who do not exercise managerial functions and who will be represented by the health and safety representative in the workplace, or the part or parts thereof, as the case may be, or, where there is a trade union or trade unions representing such workers, by the trade union or trade unions.

**Inspection Requirements**

- Unless otherwise required by the regulations or by an order by an inspector, a Health and Safety Representative shall inspect the physical condition of the workplace at least once a month.
- If it is not practical to inspect the workplace at least once a month, the Health and Safety Representative shall inspect the physical condition of the workplace at least once a year, inspecting at least a part of the workplace in each month.
- The inspection shall be undertaken in accordance with a schedule agreed upon by the Constructor or Employer and the Health and Safety Representative.
- The Constructor, Employer and workers shall provide a Health and Safety Representative with such information and assistance as the member may require for the purpose of carrying out an inspection of the workplace.

**Hazard Reporting**

A Health and Safety Representative 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 employer, the workers and the trade union or trade unions representing the workers.

**Powers of Health and Safety Representative**

- To obtain information from the Constructor or Employer concerning the conducting or taking of tests of any equipment, machine, device, article, thing, material or biological, chemical or physical agent in or about a workplace for the purpose of occupational health and safety.
- To be consulted about, and be present at the beginning of, testing conducted in or about the workplace if the Health and Safety Representative believes his or her presence is required to ensure that valid testing procedures are used or to ensure that the test results are valid.
- To obtain information from the Constructor or Employer respecting:
  - The identification of potential or existing hazards of materials, processes or equipment.
  - Health and safety experience and work practices and standards in similar or other industries of which the Constructor or Employer has knowledge.

**Additional Duties of the Health and Safety Representative**

- Be available to receive employee concerns, complaints, and recommendations.
- Provide input and review of existing and new health and safety policies and procedures.

- Be advised of the results of a workplace violence risk assessment in writing.
- Investigate work refusals and serious accidents.
- Obtain information from the WSIB about the company's compensation claims.
- Accompany an inspector during a physical inspection of the workplace.

**Response to Recommendations**

- A Constructor or Employer who receives written recommendations from a Health and Safety Representative shall respond in writing within twenty-one days.
- A response of a Constructor or Employer shall contain a timetable for implementing the recommendations the Constructor or Employer agrees with and give reasons why the Constructor or Employer disagrees with any recommendations that the Constructor or Employer does not accept.

**Notice of Accident**

- Where a person is killed or critically injured at a workplace from any cause, the Health and Safety Representative may, subject to subsection 51(2) of the OHS Act, inspect the place where the accident occurred and any machine, device or thing, and shall report his or her findings in writing to a Director.

**Entitlement to Time from Work**

- A Health and Safety Representative is entitled to take such time from work as is necessary to carry out his or her duties and the time so spent shall be deemed to be work time for which the Health and Safety Representative shall be paid by his or her Employer at the representative's regular or premium rate as may be proper. This may include time spent for inspection the workplace, investigating accidents, and attending work refusals.

**JOINT HEALTH AND SAFETY COMMITTEE / JOINT OCCUPATIONAL HEALTH AND SAFETY COMMITTEE**

A Joint Health and Safety Committee (JHSC)/Joint Occupational Health and Safety Committee (JOHSC) is required:

- at a workplace at which 20 or more workers are regularly employed.
- at a workplace with respect to which an order to an employer is in effect under Section 33 of the OHS Act.
- 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.

**Composition of Committee**

A committee shall consist of:

- The committee must have at least two members (one worker and one management) for workplaces with 20 to 49 workers.
- The committee must have at least four members (two workers and two managers) for workplaces with 50 or more workers.
- At least half the members of a committee shall be workers employed at the workplace who do not exercise managerial functions.

**Construction Project Requirements**

A Joint Health and Safety Committee(JHSC)/Joint Occupational Health and Safety Committee (JOHSC) is required on a construction project that lasts at least 3 months or longer, and where 20 or more workers are regularly employed.

- The committee must have at least two members (one worker and one management) for construction projects with 20 to 49 workers.
- The committee must have at least four members (two workers and two managers) for construction projects with 50 or more workers.

**Selection of Members**

- The members of the committee who represents workers shall be selected by workers they represent, or if union represents the workers, by the union.
- Selection will be done through a peer or self-nomination and/or voting process. If only one worker is nominated, this individual will automatically become a member of the committee.
- The employer shall select the remaining members from among persons who exercise managerial functions for the employer.
- **Specific to Province of Alberta:** Shall consist or at least 4 members, of whom at least half represent workers not associated with the management of the work site. They must be selected by the workers they represent. If the workers do not select members for the committee, then the employer must select those worker members.

### Committee Co- Chairs

- Two of the members of a committee shall co-chair the committee, one of whom shall be selected by the members who represent workers and the other of whom shall be selected by the members who exercise managerial functions.

### Committee Secretary

A secretary will be selected by nomination or election by JHSC/JOHSC members.

### Change of Members

- The MLTSD Ontario and OHS Alberta recommends a term of at least one year. Where there is more than one worker member and one employer member, terms should be staggered to allow continuity. Vacancies should be filled as quickly as possible.
- Members may serve consecutive terms if selected in accordance with this policy and legislative requirements.
- The two co-chairpersons are to be notified prior to any changes in membership in advance prior. Whenever possible, any changes to the committee membership shall occur during the new term/year cycle and must occur in a staggered manner to maintain continuity.

### Committee Member Termination

A majority vote of 75% by the committee can render a member terminated. The reasons for termination are as follows:

- Poor attendance
- Termination of employment
- Not working as a team player (as determined by the JHSC/JOHSC)
- Lack of respect for the position (as determined by the JHSC/JOHSC)
- Not completing committee work as required

NOTE. The only acceptable reasons for missing a committee meeting are:

- Absence from work due to illness or bereavement
- Vacation or other planned absences
- Extreme work assignments
- **Specific to Province of Alberta:** All JHSC/JOHSC members and co-chairs will remain in office for at least one year. A vote is required if there is a requirement for a change of members during their term. A special meeting may be held to find a replacement representative. When a replacement JHSC/JOHSC member is required, the new member must represent the same employee group being replaced.

### Certification Requirements

- Unless otherwise prescribed, a Constructor or Employer shall ensure that at least one member of the committee representing the constructor or employer and at least one member representing workers are certified members. (Refer to OHS R.S.O. 1990, c. O.1, s.9 (12).)  
This does not apply with respect to a project where fewer than fifty workers are regularly employed or that is expected to last less than three months.
- In order to be certified, both members must complete Parts 1 and 2 of mandatory training: JHSC Certification—Part One (Basic) and JHSC Certification—Part Two (Sector Specific) in Ontario. Refresher training is required every three (3) years to maintain certification. In Alberta ACSA's Joint Worksite Health and Safety Committees Course applies.
- *Prior to April 1, 2012 JHSC/JOHSC members were certified by the WSIB under the WSIA. Those certifications are still recognized under the OHS.*
- If no member representing workers is a certified member, the workers or the trade unions who selected the members representing workers shall select from among them one or more who are to become certified.
- If there is more than one certified member representing workers, the workers or the trade unions who selected the members representing workers shall designate one or more certified members who then become solely entitled to exercise the rights and required to perform the duties under this Act of a certified member representing workers.
- If there is more than one certified member representing the constructor or employer, the constructor or employer shall designate one or more of them who then become solely entitled to exercise the rights and required to perform the duties under this Act of a certified member representing a constructor or an employer
- If a certified member resigns or is unable to act, the constructor or employer shall, within a reasonable time, take all steps necessary to ensure that the requirement for the JHSC/JOHSC composition of members is met.

**Powers of Committee**

- Identify situations that may be a source of danger or hazard to workers.
- Make recommendations to the Constructor or Employer and the workers for the improvement of the health and safety of workers.
- Recommend to the Constructor or Employer and the workers the establishment, maintenance and monitoring of programs, measures and procedures respecting the health or safety of workers.
- Obtain information from the Constructor or Employer respecting:
  - the identification of potential or existing hazards of materials, processes or equipment, and
  - health and safety experience and work practices and standards in similar or other industries of which the constructor or employer has knowledge;
- Obtain information from the Constructor or Employer concerning the conducting or taking of tests of any equipment, machine, device, article, thing, material or biological, chemical or physical agent in or about a workplace for the purpose of occupational health and safety.
- Be consulted about, and have a designated member representing workers be present at the beginning of, testing conducted in or about the workplace if the designated 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.
- The members of the committee who represent workers shall designate one of them who is entitled to be present at the beginning of testing.

**Additional Duties of the Committee**

- Be available to receive employee concerns, complaints, and recommendations.
- Provide input and review of existing and new health and safety policies and procedures.
- Be advised of the results of a workplace violence risk assessment in writing.
- Investigate work refusals and serious accidents.
- Obtain information from the WSIB about the company’s compensation claims.
- Accompany an inspector during a physical inspection of the workplace.
- If the committee has failed to reach consensus about making recommendations after attempting in good faith to do so, either co-chair of the committee has the power to make written recommendations to the Constructor or Employer.

**Recommendations**

- All recommendations the committee makes shall be recorded in the minutes and on a recommendations form. A member will be assigned to follow up with the Constructor or Employer on the action after a meeting is adjured. All recommendations should provide as much detail as possible to expedite the process for both the employer and the JHSC/JOHSC.
- The Employer has 21 days to respond to the recommendations. If the response affirms that action will be acquired, there shall be an action plan with timeline attached for completion. If the response is no, the employer shall give reasons why. In this case the committee may re-work the recommendation, investigate further into the issue, or arrange a special meeting with the employer to fulfill a positive outcome.

**Response to Recommendations**

- A Constructor or Employer who receives written recommendations from a committee or co-chair shall respond in writing within twenty-one days.
- A response of a Constructor or Employer shall contain a timetable for implementing the recommendations the constructor or employer agrees with and give reasons why the constructor or employer disagrees with any recommendations that the constructor or employer does not accept.

**Administrative Tasks**

- The two co-chairs and/or JHSC/JOHSC Secretary shall set up the meeting room prior arrival of members, as well as prepare for the meeting. Such preparation could include refreshments, cleaning the area, and ready materials needed for the meeting such as paperwork and presentations.

**Agenda**

- An agenda shall be formed and distributed by the co-chairpersons one week prior to the meeting. All committee members will submit topics to the co-chairpersons before this time. A summary of accidents, incidents, illnesses, and diseases will be attached.

- Anyone with a workplace related health and safety concern should approach a committee member prior to the scheduled meeting. The committee member shall address the concern at the next meeting. If the nature of the concern is of an immediate hazard, the member will take the appropriate action immediately. If the nature of the concern is not an immediate hazard, the member will bring the topic up to be discussed at the next scheduled meeting.

**Committee Meeting Typical Agenda**

- |   |  |
|---|--|
| <ul style="list-style-type: none"> <li>• Call to order</li> <li>• Roll call – Chairman introduces any guests or visitors present</li> <li>• Review business arising out of previous minutes</li> <li>• Reading of relevant correspondence and reports</li> <li>• First Aid, Incident/Accident, near miss review, hazard reports</li> <li>• Recommendations and suggestions</li> </ul> | <ul style="list-style-type: none"> <li>• Training Reports</li> <li>• Hygiene Reports</li> <li>• Ministry of Labour visits, reports</li> <li>• Discuss the work schedule and its impact on safety</li> <li>• New business</li> <li>• Set date, time and location for next meeting</li> <li>• Adjournment</li> </ul> |
|---|--|

**Committee Meetings**

- A committee shall meet at least once every three months at the workplace and may be required to meet by order of the Minister. The committee may need to meet more often if there are specific workplace health and safety issues to address or if the work involves a hazardous substance or procedure.
- A committee shall maintain and keep minutes of its proceedings and make the same available for examination and review by an inspector.
- Every effort will be made to research and discuss items so the committee can reach a consensus. On occasion where a consensus is not possible, a vote may be required. A vote for all members present is taken and majority carries.
- At minimum, members representing both workers and the employer must be present. Ideally, both co-chairs should also be present at every meeting.
- The meeting must be separate from production meetings or General Site Safety Meeting
- The meeting minutes must be documented and filed.

**Special Meetings**

- Emergency or special meetings may be required. The process is that the two co-chairpersons plus the requesting member must agree the meeting is required. The co-chairperson that is scheduled to chair the next regular meeting will be responsible for notifying all JHSC/JOHSC members of the date, time, and location of the special meeting.

**Meeting Guests**

- The two co-chairpersons mutually may invite a guest to attend the meeting. The purpose of a guest attending a meeting would be to obtain technical information or comment on a specific agenda item. The guest shall not participate in the regular business of the meeting, and should be excused from the meeting after their presentation is complete.

**Voting**

- The committee shall strive to operate with consensus, meaning that everyone must agree on the decision. Reaching consensus can be a long and challenging process, but the outcome is superior. Some decisions may have to be voted on and the majority will determine the outcome.

**Committee quorum**

- The committee shall have a quorum of (%) members present to conduct business. The number of management members shall never be greater than the number of worker members. At least one co-chair shall be present to conduct business. If one co-chair is absent the other co-chair will direct the meeting, and appoint a member to take minutes.

**Meeting Minutes**

- Minutes are a permanent record of all business that took place at the meeting. Specific employee names shall not appear on the posted copy of the minutes.
- The minutes of the meeting are to be taken at each meeting by the JHSC/JOHSC Secretary. Approved copies of the minutes shall be posted on the safety board within one week after the meeting. The JHSC/JOHSC and Managers shall receive copies of the minutes.
- The minutes of all committee meetings will be kept by the members for future reference.

**Inspections**

- The members of a committee who represent workers shall designate a member representing workers to inspect the physical condition of the workplace.
- If possible, the member designated under subsection shall be a certified member.
- The members of a committee are not required to designate the same member to perform all inspections or to perform all of a particular inspection.
- Unless otherwise required by the regulations or by an order by an inspector, a member designated shall inspect the physical condition of the workplace at least once a month.
- If it is not practical to inspect the workplace at least once a month, the member designated shall inspect the physical condition of the workplace at least once a year, inspecting at least a part of the workplace in each month.
- The inspection) shall be undertaken in accordance with a schedule established by the committee.
- The constructor, employer and the workers shall provide a member designated with such information and assistance as the member may require for the purpose of carrying out an inspection of the workplace.

**Inspection documentation**

- All documents used in the inspection will be made available to each member at the next JHSC/JOHSC meeting. A copy of the inspection will become part of the JHSC/JOHSC minutes. The member’s inspection report to the JHSC/JOHSC shall be noted in the minutes as a summary. The actual inspection report will not be posted on the safety boards.

**Hazard Reporting**

- The member shall inform the committee of situations that may be a source of danger or hazard to workers and the committee shall consider such information within a reasonable period of time.

**Notice of Accident**

- The committee shall be notified of all critical injuries and fatalities at the workplace. It shall be the worker certified member’s decision to participate in the investigation of the accident. A critical injury is defined as an injury that:
  - Places life in jeopardy
  - Produces unconsciousness
  - Results in a 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
  - Causes loss of sight in an eye
- When members of a committee who represent workers becomes aware of an accident in which he will be required to investigate, he shall notify his supervisor or an alternate supervisor / manager immediately, then proceed directly to the accident scene to coordinate participation in the investigation with the Manager. The role of the worker member investigating the accident is to meet legal requirements, determine the cause(s) and to provide a report with recommendations to the JHSC/JOHSC.
- The members of a committee who represent workers shall designate one or more such members to investigate cases where a worker is killed or critically injured at a workplace from any cause and one of those members may, subject to subsection 51 (2) of the OHSA, inspect the place where the accident occurred and any machine, device or thing, and shall report his or her findings to a Director and to the committee.
- The JHSC submits the report to the Manager/Supervisor and they cooperatively review and finalize the report identifying all contributing factors and identified proposed corrective actions. The Manager/Supervisor signs the specific report and forwards a copy to the Senior Management. The Report will then be forwarded by the Senior Management to the applicable ministry officer.
- The JHSC/JOHSC in the case of injury ensures the injured worker(s) receives appropriate medical and receives injury package.

**Posting of Names and Work Locations**

A Constructor or an Employer required to establish a committee under this section shall post and keep posted at the workplace the names and work locations of the committee members in a conspicuous place or places where they are most likely to come to the attention of the workers.

**Entitlement to Time from Work**

A member of a committee is entitled to:

- One hour or such longer period of time as the committee determines is necessary to prepare for each committee meeting.
- Such time as is necessary to attend meetings of the committee.
- Such time as is necessary to carry out the member's duties under the OHSA.

**Entitlement to Be Paid**

- Member of a committee shall be deemed to be at work during the times described in and the member's employer shall pay the member for those times at the member's regular or premium rate as may be proper.
- A member of a committee shall be deemed to be at work while the member is fulfilling the requirements for becoming a certified member and the member's employer shall pay the member for the time spent at the member's regular or premium rate as may be proper.

**Notification**

- JHSC/JOHSC members shall notify their immediate supervisor of regularly scheduled committee meetings at minimum 1 week prior to the meeting.

**WORKERS TRADE COMMITTEE**

- If a committee is required at a project, other than a project where fewer than fifty workers are regularly employed or that is expected to last less than three months, the committee shall establish a worker trades committee for the project.
- The members of a worker trades committee shall represent workers employed in each of the trades at the workplace.

**Selection of Members**

- The members of a worker trades committee shall be selected by the workers employed in the trades the members are to represent or, if a trade union represents the workers, by the trade union.

**Function**

- It is the function of a worker trades committee to inform the committee at the workplace of the health and safety concerns of the workers employed in the trades at the workplace.

**Entitlement to Time from Work**

- A member of a worker trades committee is entitled to such time from work as is necessary to attend meetings of the worker trades committee and the time so spent shall be deemed to be work time for which the member shall be paid by the employer at the member's regular or premium rate as may be proper.
- The committee for a workplace shall determine the maximum amount of time for which members of a worker trades committee for the workplace are entitled to be paid for each meeting of the worker trades committee.

**Consultation on Industrial Hygiene Testing**

- The constructor or employer at a workplace shall consult a health and safety representative or the committee with respect to proposed testing strategies for investigating industrial hygiene at the workplace.
- The constructor or employer shall provide information to a health and safety representative or the committee concerning testing strategies to be used to investigate industrial hygiene at the workplace.
- A health and safety representative or a designated committee member representing workers at a workplace is entitled to be present at the beginning of testing conducted with respect to industrial hygiene at the workplace if the representative or 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. The committee members representing workers shall designate one of them for the purpose of being present during the testing.

**Worker Health and Safety Concerns**

- All employees are encouraged to discuss their concerns with their immediate supervisor before bringing it to the attention of the JHSC/JOHSC or H&S Representative. When a supervisor is informed of a worker safety concern, they shall promptly and courteously investigate and address the issue with the worker. If the supervisor cannot correct or resolve the issue at the time of reporting, he shall notify the worker of an approximate time frame for the concern to be resolved.
- If the concern is satisfactorily resolved, the worker may take the concerns to a member of the JHSC/JOHSC or H&S Representative and request that it be addressed at the earliest opportunity. When the committee or representative has addressed the concern and/or made a recommendation for the resolution of the issue, the worker shall be notified; and shall be informed when the concern is resolved.

**WORK REFUSAL**

A worker can refuse work if they have 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 – 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 the act or the regulations, and such contravention is likely to endanger himself, herself or another worker.

**PROCESS**

- 1) The worker shall report immediately to supervisor and reasons why.
- 2) The supervisor shall check the circumstances immediately and rectify the problem if possible.
- 3) If the supervisor cannot rectify the problem, the supervisor shall investigate the refusal immediately in the presence of the refusing worker, and the worker certified member of JHSC/JOHSC (if possible) or a worker member of the committee.
- 4) If the refusing worker feels the problem has been corrected the work refusal process ends and the worker returns to work.
- 5) If the refusing worker is not satisfied with the results of the investigation (still have reasonable grounds) the worker, supervisor, or committee member shall notify the Ministry of Labour who will investigate the refusal.
- 6) Pending the investigation and decision of the Ministry of Labour inspector, the supervisor will assign reasonable alternate work.
- 7) The supervisor, while waiting for the Ministry of Labour inspector, can ask another worker to perform the refused work. The second worker shall be informed in the presence of the committee member, that the work has been refused and the reasons why. The second worker has the same right to refuse the work.
- 8) The Ministry of Labour inspector's decision must be given in writing, to the worker, the employer, and the committee representative.

**WORK STOPPAGE**

Certified members of the JHSC/JOHSC have the right to issue a work stoppage if they believe that dangerous circumstances exist (i.e., Work Refusal Investigation). Dangerous circumstances are:

- A provision of the act or regulations is being contravened,
- The contravention poses a danger or a hazard to the worker, and
- The danger or hazard is such that any delay in controlling it may seriously endanger a worker

All 3 of these criteria must be present to be considered dangerous circumstances.

**PROCESS**

- 1) The certified member, who has reason to believe dangerous circumstances exist, may request that a supervisor (employer) investigate the matter and the supervisor will promptly do so in the presence of the certified member which may include involvement of the (Designated Manager).
- 2) If the certified member believes that dangerous circumstances continue to exist after the employer's investigation and remedial actions, the certified member shall request a second certified member (representing the other side) to investigate the matter in the presence of the first certified member.
- 3) If both certified members find that dangerous circumstances exist; the certified members may direct the employer to stop work or to stop the use of any part of the workplace, equipment, machine or device. The employer shall immediately comply.
- 4) If the certified members do not agree that dangerous circumstances exist, either member may request that a Ministry of Labour inspector investigate the matter and provide the certified member with a written decision.
- 5) The Ministry of Labour inspector's decision will be in writing and will be given to the certified members. The employer shall immediately comply with the inspector's report.
- 6) After taking remedial steps to correct the dangerous circumstances, the employer may request the cancellation of the stop work order.
- 7) The certified members who issued the direction may jointly cancel it or a Ministry of Labour inspector may cancel it.



## COMMUNICATION

- Govan Brown Health & Safety Representatives (HSR)/JHSC/JOHSC policy and procedures located in the Govan Brown health and safety binder and be posted in the workplace H&S safety Boards.
- Govan Brown's Health & Safety Representatives (HSR)/JHSC/JOHSC policy and procedures will be communicated to all new Govan Brown workers, supervisors, and managers through new employee general orientation or site-specific induction and/ or through periodic management and staff safety meetings or toolbox talk meetings.
- All existing Govan Brown staff will receive orientation through the OHS Program / Occupational Health and Safety Management System (OHSMS) orientation and /or through Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC)/Joint Occupational Health and Safety Committee (JOHSC) communication and periodic management and staff safety meetings as well as through periodic and ongoing safety training, internal communication protocols or structured training sessions.
- List of applicable regulations and documentation will be kept in workplace / on project site Safety board and communicated to work parties during the safety meeting, site orientation / toolbox talks.
- This procedure will be made available at the point of use to workers, subcontractors and suppliers upon request.

## TRAINING

- All new managers, supervisors, and workers will receive training Govan Brown Health & Safety Representatives (HSR)/JHSC/JOHSC policy and procedures during their on-boarding training upon hire.
- All new employees will receive awareness training as part of their orientation on their specific health and safety roles and responsibilities through the new hire orientation process.
- All existing employees will receive training on their health and safety roles and responsibilities through periodic staff OHS Program / Occupational Health and Safety Management System (OHSMS) orientation safety meetings as well as through periodic and ongoing safety training or structured training sessions.
- Verification of training will be confirmed via sign off and may include knowledge verification testing.
- The members of the JHSC/JOHSC will be required to take appropriate training in health and safety material. The employer will strive to ensure that each member receives proper training in the following:
  - Joint Health & Safety Committees
  - Health & Safety law
  - Investigating accidents
  - Hazard identification
  - Workplace inspections
- The employer will provide the appropriate training to the JHSC/JOHSC. Where applicable at least two JHSC/JOHSC representatives will be certified; one management and one worker representative and will receive the prescribed training per the regulations by an outside designated third party.

## EVALUATION

- Legislation Policy, program and procedures as well as Health & Safety Representatives (HSR)/JHSC/JOHSC policy and procedures will be reviewed on annual basis by Senior Management and /or during the annual OHS Program / Occupational Health and Safety Management System (OHSMS) internal audit and maybe changed due to business needs, any legal requirements and based on the results of the evaluation to ensure it continues to meet OHS regulation and standards and to ensure it is relevant with current operations and any changes will be indicated in the meetings minutes or reflected on the revision page.
- The Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC)/ Joint Occupational Health and Safety Committee (JOHSC) and management will also be involved with the evaluation by analyzing forwarded items of concern and suggesting corrective action.
- On a yearly basis, management will review OHS Program / Occupational Health and Safety Management System (OHSMS) to assess whether it is still compliant with current regulations and with the current work environment. If necessary and if required procedure will be amended to reflect the current operation.
- After the year-end audit a thorough analysis of the gaps identified will be conducted by the Internal Auditor & Senior Management will develop an action plan that addresses the deficiencies with an overall goal of continual improvement.
- Senior Management at least annually or more often as required should review and validate company Document Control Master List with indication supporting documents needed to implement, monitor and maintain active

OHS Program / Occupational Health and Safety Management System (OHSMS) effectively and assess conformance with business, corporate and legal requirements as well as compliance with applicable standards.

- Document Controller or Designee will coordinate and manage Document Control Register to ensure changes to, and current versions status of, documents are identified and tracked in order to prevent the unintended use of obsolete documents and identify such documents if they are retained for any purpose

## **REFERENCE**

Occupational Health and Safety Act R.S.O. 1990

OHS Program / Occupational Health and Safety Management System (OHSMS)

Document Control Master List

Document Control Register

Workplace Inspection Report

Injury, illness & incident reporting chart

JHSC package:

HSR JHSC Members Poster;

JHSC Meeting Schedule;

JHSC Meeting Minutes;

HSR / JHSC Recommendation to Senior Management

## **WORKPLACE VIOLENCE AND HARASSMENT POLICY STATEMENT**

The Senior Management of Govan Brown Associates Limited is committed to providing a work environment in which all workers are protected from workplace violence and harassment. Management recognizes that all workers have the right to work in a violence and harassment free work environment.

Any violence and/or harassment committed by or against any member of our workplace or the public will not be tolerated.

There is a workplace violence and harassment program in place that implements this policy. It includes measures and procedures to protect workers from workplace violence and harassment, a means of summoning immediate assistance, training of workers and a process to report incidents or raise concerns.

Govan Brown Associates Limited as the employer will ensure that this policy and supporting program are implemented and maintained and that all workers and supervisors have the appropriate information and instruction to protect them from violence and harassment in the workplace.

Supervisors will adhere to this policy and the supporting program. Supervisors are responsible for ensuring that measures and procedures are followed by workers and that workers have the information they need to protect themselves.

Every worker must work in compliance with this policy and the supporting program. All workers are encouraged to raise any concerns about workplace violence and harassment and to report such matters to their supervisor, management and/or human resource department following the framework of the Workplace Violence and Harassment Program & Procedure.

Management will investigate and deal with all incidents and complaints of workplace violence and harassment in a fair and timely manner respecting the privacy of all concerned parties. Govan Brown Associates Limited senior management along with Health and Safety team will review and assess this policy annually.

Govan Brown Associates Limited, as an employer, is ultimately responsible for worker's health and safety and recognizes the right of workers to work in a safe and healthy workplace.

As president, I give you my personal commitment that I will comply with my duties under the Occupational Health and Safety Act, such as taking every reasonable precaution for the protection of workers in the workplace



March 22/24

Colin Gray

Date

President – Govan Brown Associates Limited

## **WORKPLACE VIOLENCE AND HARASSMENT PROGRAM & PROCEDURE**

### **PURPOSE**

Govan Brown is committed to providing a safe and healthy work environment for employees by using every precaution reasonable for the protection of a worker under section 25(2)(h) of the OH&S Act. The Violence and Harassment in the Workplace policy outlines the policies and procedures that will be implemented to ensure that workers are aware of the hazards of violence/harassment; are aware of the legislation; and are aware of the safe job procedures in the workplace. These are created through the violence harassment risk assessment conducted by the employer. The Harassment and Violence Policies and Procedures are not intended to discourage anyone from exercising their rights under any and all other laws, including the OHS Act, Alberta Human Rights Act, WorkSafeBC and any other acts and regulations.

Govan Brown Violence & Harassment Policy statement will be posted in the workplace in a conspicuous location accessible to all workers and outline the following:

- Procedures that will assess the risk of violence/harassment in the workplace & the process to implement controls.
- Procedures for workers to report any incident/complaint of violence/harassment to their supervisor or management.
- Procedures to investigate such reports.
- How Govan Brown will investigate & deal with the incidents/complaints of workplace violence/harassment when reported.

Govan Brown believes in providing a safe work environment free from any harassment or violence. Any act of violence/harassment in the workplace will not be tolerated, is not acceptable, and is not condoned by Govan Brown.

### **SCOPE**

This policy, program and procedural framework applies to all of Govan Brown workplaces and operations within Canada ensuring that work parties' requirements are fulfilled with regards to identification and assessment of the risk of workplace violence and harassment and the process to implement controls

Program and procedural framework will include but not limited:

- Outline Management commitment, as well as roles and responsibilities for all Govan Brown workplace parties; (management, supervisors, and workers) for Workplace Violence and Harassment prevention
- Procedures to identify & assess risks of workplace violence and harassment
- Recognize the right of workers to work in a violence and harassment free work environment
- Identification of safe procedures to mitigate identified risks with recommended controls
- Procedures for reporting workplace violence & harassment
- Steps to obtain necessary assistance

### **DEFINITIONS**

#### **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 behavior that is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker;

#### **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.

#### **Workplace sexual harassment means:**

- 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
- 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;

## **ROLES & RESPONSIBILITIES**

### **MANAGEMENT**

- Ensure that a workplace violence and harassment risk assessment is conducted and updated when there is a change in regulations or operations; at a minimum, annually.
- Review of the violence and harassment risk assessment and implementation of a risk reduction plan to achieve acceptable levels.
- Formulation of Workplace Violence and Harassment Policy, program and commitment towards elimination of workplace related violence and harassment incidents. The policy shall consider any party that may visit the workplace such as fulltime worker, visitor, contractor and temporary workers.
- Consider measures and procedures for workers to report incidents of workplace harassment to a person other than the employer or supervisor, if the employer or supervisor is the alleged harasser.
- Identify how a worker who has allegedly experienced workplace harassment and the alleged harasser (if s/he is a worker of the employer) will be informed of the results of the investigation and of corrective action that has been, or will be, taken.
- Identify process for workers to obtain assistance in the event of exposure to violence and/or harassment.
- Ensuring current posting of Govan Brown Workplace Violence and Harassment Statement, as follows:
  - o Communication by means of posting in required area(s), such as Safety Boards, Employee Handbooks, Supervisor Handbooks, Worker Orientation and Subcontractor Contract Package, any revisions will be through safety talk, email or bulletins, along with updates in the Occupational Health and Safety Program Manual.
  - o Evaluation by regular scheduled inspection reports
- Review the Workplace Violence and Harassment Policy and program at a minimum annually; after an incident of violence or harassment or upon any change in regulations.
- Develop and implement action plan based on any gaps identified in the review.

### **SUPERVISORS**

- Ensure all reports and complaints of incidents involving workplace violence and are reported and investigated in a timely manner.
- Ensure the Workplace Violence and Harassment policy and program is properly enforced and communicated.
- Provide employees with a safe work environment that is free of workplace violence and harassment.
- Be aware of the signs of workplace violence/ harassment and be prepared to intervene when appropriate.
- Perform a project site-specific risk assessment with the assistance from the health and safety representative at the start of a project along with an annual review
- Ensure that timely investigation is conducted in a confidential manner when suspicion or awareness to violence and/or harassment risk has been identified.

### **JOINT HEALTH AND SAFETY COMMITTEE / H & S REPRESENTATIVE**

- Assist the Employer in maintaining the Workplace Violence and Harassment program and provide feedback, whether orally or in writing.
- Be advised of the results of a workplace violence risk assessment.
- Participate in an investigation where there is a work refusal as a result of workplace violence or harassment.
- Respond to employee concerns related to workplace violence or harassment.
- To review the completed initial violence/harassment assessment with Govan Brown and forward a copy to the JHSC/JOHSC.
- Work cooperatively with Govan Brown to implement controls to address the identified risk(s) (if applicable) and ensure that all workers are advised of the safe work procedures identified through the control process.

**WORKERS**

- Report all incidents of the workplace violence or harassment to a supervisor/manager immediately, whether verbally or in writing.
- Treat everyone in the workplace with dignity and in a manner that is respectful and free of violence, threats, intimidation and harassment.
- Refuse to accept violent behavior from others, regardless of whether that behavior is perpetrated by one's manager or co-workers, or by a supplier or member of the public.
- Intervene and/or report instances of inappropriate behavior on the part of others which could amount to workplace violence immediately to a supervisor/manager.
- Cooperate fully with any and all workplace violence or harassment investigations.
- Participate in education and training programs in order to be able to appropriately respond to any incident of workplace violence and harassment.
- Comply with Workplace Violence and Harassment Policy and program requirements.
- Active participation to bring forward to Govan Brown any incidences of workplace violence or harassment.
- Awareness, understanding and acknowledgement of Govan Brown Workplace Violence and Harassment Policy Statement along with the affiliated project site-specific risk assessment and controls.

**CONTRACTOR/SUBCONTRACTOR**

- Ensure all reports and complaints of incidents involving workplace violence and are reported and investigated in a timely manner.
- Ensure the Workplace Violence and Harassment policy and program is properly enforced and communicated.
- Provide employees with a safe work environment that is free of workplace violence and harassment.
- Comply with Workplace Violence and Harassment policy and program requirements.
- Active participation to bring forward to management any incidences of violence or harassment.
- Awareness, understanding and acknowledgement of Govan Brown Workplace Violence and Harassment Policy Statement along with the affiliated project site-specific risk assessment and controls.

**PROCEDURE**

Govan Brown is committed to providing a safe and healthy work environment for employees by using every precaution reasonable for the protection of a worker under section 25(2)(h) of the OHSA.

The Violence and Harassment in the Workplace policy outlines the policies and procedures that will be implemented to ensure that workers are aware of the hazards of violence/harassment; are aware of the legislation; and are aware of the safe job procedures in the workplace. These are created through the violence harassment risk assessment conducted by the employer.

Govan Brown's Violence/Harassment Policy will be posted in the workplace in a conspicuous location accessible to all workers and outline the following:

- Procedures that will assess the risk of violence/harassment in the workplace & the process to implement controls.
- Procedures for workers to report any incident/complaint of violence/harassment to their supervisor or Govan Brown.
- Procedures to investigate such reports.
- How Govan Brown will investigate & deal with the incidents/complaints of workplace violence/harassment when reported.

Govan Brown believes in providing a safe work environment free from any harassment or violence. Any act of violence/harassment in the workplace will not be tolerated, is not acceptable, and is not condoned by Govan Brown as employer, Govan Brown will ensure the creation of a clear and concise Workplace Violence and Harassment Policy Statement from the most senior management member to include

- Commitment
- Responsibilities
- Date & Signature

## PROHIBITED BEHAVIOUR

**Discrimination:** The conduct prohibited by this policy includes any discriminatory employment action and any unwelcome conduct (verbal, visual or physical) that affects someone because of that individual's protected status. Among the types of unwelcome conduct prohibited by this policy are epithets, slurs, negative stereotyping, intimidating acts, and the circulation or posting of written or graphic materials that show hostility toward individuals because of their protected status. Govan Brown prohibits that conduct even if it is not sufficiently severe or pervasive to constitute unlawful harassment.

**Bullying:** The conduct prohibited by this policy also includes bullying. Bullying is the use of aggression with the intent to harm another individual. Bullying can include any written, verbal or physical act, when the act physically harms an individual or damages the individual's property, when the act interferes with an individual's peace of mind or ability to work, or when the act is severe or part of a pervasive pattern of conduct that creates an intimidating or threatening work environment.

The following are examples of prohibited behaviours under this policy and are in no way intended to be exhaustive:

- Threats or intimidation
- Possession of weapons of any kind
- Assault
- Physical restraint or confinement
- Sexual harassment
- Yelling, screaming, rudeness, angry outbursts, swearing or making humiliating demeaning comments
- Blatant or intentional disregard for the safety or well-being of others
- Retaliation against anyone who has made a complaint or who has participated in an investigation under this policy
- Failure to report an incident of workplace violence and harassment to which the worker is aware
- Making false allegations of harassment or discrimination
- Breaches of this policy
- Any other act which is considered to be a violation of this policy, whether or not specifically listed above.

## Workplace Violence Risk Assessment

Govan Brown will complete a workplace violence risk assessment and identify controls to address hazards identified.

As a part of hazard assessment process Govan Brown will:

- Assess the risk of workplace violence that may arise from the nature of the workplace, type of work or conditions of work
- Take into account the circumstances of the workplace and circumstances common to similar workplaces, as well as any other elements prescribed in regulation and,
- Develop measures and procedures to control identified risks that are likely to expose a worker to physical injury. These measures and procedures will be part of the workplace violence program.

The risk assessment may include review of records and reports: e.g., security reports, employee incident reports, staff perception surveys, health and safety inspection reports, first aid records, or other related records. Specific areas that may contribute to risk of violence may include, but are not limited to, contact with the public, and exchange of money, receiving doors, delivery of goods and services, domestic violence, working in mobile workplaces, driving/working alone or in small numbers, working late at night or during early morning hours, working in the downtown core which has seen an uptick in crime, working with tools that may be seen as valuable to others, workers who travel by transit late at night, and working in community-based settings. Research may also include a review of similar workplaces with respect to their history of violence, if required.

The risk assessment will be re-assessed as often as necessary to protect workers from workplace violence and will be reviewed at least annually. The Joint Health and Safety Committee will be advised of the results of the assessment and any re-assessments conducted, in writing.

Govan Brown will ensure that the proper measures and procedures are in place to control the risk identified in the assessment.

**Reporting Harassment in the Workplace**

- All incidents of alleged discrimination, harassment, retaliation, or other conduct inconsistent with this policy must be reported immediately.
- Anyone who is subjected to, witnesses, or has knowledge of, any incidents or threats of workplace violence and harassment, including sexual harassment, must report to a management or supervisor at Govan Brown immediately. This includes domestic violence situations that would likely expose employees to physical injury in the workplace.
- If the worker's supervisor or reporting contact is the person engaging in the workplace harassment, the worker can contact any other member of the management team (i.e., manager or supervisor of another department or work area) or Human Resource department.
- If the Employer (e.g., owner, senior executive, director) is engaging in workplace harassment, the employee can report directly to the Human Resources department. If deemed necessary, the Human Resources department may have an external person who is qualified in investigating incidents of workplace harassment and has relevant knowledge of workplace harassment law, conduct the investigation.
- Information about complaints and incidents shall be kept confidential to the extent possible. Information obtained about an incident or complaint of workplace harassment, including identifying information about any individuals involved, will not be disclosed unless disclosure is necessary to protect workers, to investigate the complaint or incident, to take corrective action or otherwise as required by law.
- While the investigation is on-going, the worker who has allegedly experienced harassment, the alleged harasser(s) and any witnesses should be told not to discuss the incident or complaint or the investigation with each other or other workers or witnesses unless necessary to obtain advice about their rights. The investigator may discuss the investigation and disclose the incident or complaint-related information only as necessary to conduct the investigation.
- All records of the investigation will be kept confidential.

**Reporting Violence in the Workplace**

In the event that an employee is either directly affected by or witness to any violence in the workplace, it is imperative for the safety of all Govan Brown employees that the incident is reported immediately to supervisor, management, or the Human Resources department.

In the event of an emergency situation or where an employee feels that his or her life is in direct danger, the employee is to call 911 prior to contacting their supervisor or manager.

Any violence, perceived or actual, shall be immediately reported to the Supervisor, who will notify Govan Brown.

Assistance from Govan Brown can be made by telephone or most effective means of communication.

If the worker does not feel comfortable reporting to their manager/supervisor, they can report to their Human Resources representative.

Once the incident has been reported, all reports shall be investigated, and dealt with appropriately in a timely manner.

Incidents that constitute criminal acts (whether felony or misdemeanor) will be referred to the local police department or other government authorities.

All reports and records shall be kept confidential and will not be disclosed to anyone except to the extent required by law. Govan Brown will do everything it can to protect the privacy of the individuals involved and to ensure that complainants and respondents are treated fairly and respectfully. Govan Brown will protect this policy so long as doing so remains consistent with the enforcement of this policy and adherence to the law.

In no way shall any employee who reports threats or acts of violence be retaliated against through disciplinary action.



***Specific to Province of Alberta***

Investigate the incident. Interview all parties involved, separately. Receive witness statements. Investigations are to be performed by the safety officer and/or supervisor or member of the management team and/or HS rep/ HS Committee and/or designated recipient. All discussions must be kept private. The investigator will be someone who is agreed to by yourself, the principal party and the responding party. Check the definitions for harassment and violence to ensure they meet guidelines.

You must inform the responding party when you first contact them:

- that they have been named or identified as the responding party in a notice of an occurrence
- how to access the workplace harassment and violence prevention policy of each step of the resolution process, and that they may be represented during the resolution process.

**Govan Brown will:**

1. Initiate a negotiated resolution with the principal party within 45 days of receiving the notice of an occurrence.
2. Define corrective actions and recommendations.
3. Implement corrective actions (jointly agreed upon with HS Rep and Committee where applicable)
4. Discuss the outcome of the incident investigation once completed with involved parties, privately and with discretion, on a one-on-one basis. Ensure any parties who want a copy of the investigator’s report receives one.
5. Follow up. You must provide monthly updates regarding the status of the resolution process to the principal and responding parties.

Regarding domestic violence situations, any employee found in that situation is encouraged to:

1. Call their local police department and/or local CPS detachment.
2. Seek medical attention.
3. Contact their employer. Govan Brown will offer assistance to employees with regards to job scheduling, etc. and whatever means are appropriate to the situation.

**Summoning Immediate Assistance**

In the event that workplace violence occurs, where an employee feels that their life is at risk or that of a co-worker the employee is to immediately contact police or emergency responders and seek the assistance of others in the immediate area. If possible, the employee should try to separate themselves from the situation and move to a safe area. When safe to do so the employee is to inform their supervisor or manager of the incident. The site supervisor will immediately summon police assistance, by dialing 9-1-1, if the threat for physical violence is believed or an assault has been committed.

Employees who need to summon immediate assistance have a number of options including, but not limited to:

- Using a panic button or air horn, as appropriate.
- Using personal, building or vehicle alarms.
- Using code words with co-workers to seek immediate assistance.
- Yelling for assistance from co-workers.
- Phoning immediate supervisor or Health & Safety Representative /Joint Health and Safety Committee member for immediate assistance.
- Phone police or emergency services assistance

**Making a Police or Emergency Services Call:**

- Avoid delay in making the call.
- Remain calm.
- Use the phone to dial 9-1-1 or your emergency assistance contact.
- When asked by the operator, state the service you require; for example, police, fire or ambulance.
- Let the operator control the conversation. They have standard questions for obtaining critical information from you in a timely and orderly manner.

- Clearly state your location and the location of the situation you are reporting using the street address, major intersection, location if you know it.
- State briefly and clearly what you have observed or why you are calling.
- If possible, without exposing yourself to danger, stay on the line until emergency services arrive, unless the operator specifically asks you to hang up.
- Panic buttons/ air horns can be used to summons immediate assistance if provided depending on your location.
- Be proactive and be prepared. Employees should check with their supervisor for other methods or procedures to obtain immediate assistance.

Any violence, perceived or actual, shall be immediately reported to the Supervisor, who will notify Govan Brown.

Assistance from Govan Brown can be made by telephone or most effective means of communication.

If the worker does not feel comfortable reporting to their manager/supervisor, they can report to their Human Resources representative.

### **Domestic violence**

- Govan Brown will take every precaution reasonable in the circumstances for the protection of a worker when we are aware, or ought reasonably to be aware, that domestic violence may occur in the workplace, and that it would likely expose a worker to physical injury. All acts of domestic violence including violence at the hands of one's current or former spouse or partner will not be tolerated.
- Govan Brown encourages all employees who fear that domestic violence may enter the workplace to report their concerns to their supervisor or manager.
- Govan Brown is prepared to investigate and deal with these concerns on a case by case basis. We will work closely with the targeted worker to develop reasonable precautions to address the situation while attempting to respect the workers privacy and sensitivity of the issue.
- If an employee is experiencing domestic violence or an employee has reason to believe that a co-worker is experiencing domestic violence that could expose that employee or another employee to physical injury in the workplace, the employee should seek immediate assistance. Refer to section above for Summoning Immediate Assistance guidelines.
- In the event that an employee is either directly affected by or witness to any violence in the workplace, it is imperative for the safety of all Govan Brown employees that the incident is reported immediately to supervisor, management, or the Human Resources department.
- In the event of an emergency situation or where an employee feels that his or her life is in direct danger, the employee is to call 911 prior to contacting their supervisor or manager.

### **Investigation**

Govan Brown will ensure that an investigation appropriate in the circumstances is conducted when the employer, manager/supervisor, or Human Resources department becomes aware of an incident or complaint of workplace violence and harassment. Ensure the investigator has been trained in investigations.

All Employees/Management have a responsibility to co-operate with any efforts to investigate and resolve matters pertaining to this policy.

Upon receipt of a formal complaint of violence and harassment, the company will determine whether a formal investigation is necessary and inform the parties involved in writing of the investigation. The investigation may be carried out by an internal or external party and will be done as quickly as possible.

The investigator will explore the alleged incident by interviewing the complainant, alleged violator, and/or those who may have knowledge of the circumstances that led to the complaint.

The person designated to conducting the investigation, will be competent and trained in doing so. In some situations, Govan Brown may decide to conduct an investigation using an impartial person, such as a 3rd party consultant or company.

Such situations may include when allegations of workplace violence involve a member of senior management or above, Govan Brown will refer the investigation to an external investigator to conduct an impartial investigation.

Govan Brown may also take appropriate interim measures (such as temporary reassignments or shift changes, etc.) to protect workers and witnesses while the incident or complaint is being investigated, as may be appropriate.

Investigation is required in writing when anyone files a report in accordance with this policy and procedure. All incidents of harassment and/or violence must be reported to Senior Management.

The investigation shall be conducted as per Govan Brown Investigation and reporting policy and protocol.

Govan Brown will ensure that all information obtained during the course of an investigation will not be disclosed, unless the disclosure is necessary for the purposes of investigating or taking corrective action or is otherwise required by law. Failing to use discretion when dealing with harassment and violence could have legal recourse through Canada Labour Code, OH&S, Canadian Human Rights Act as well as other applicable laws or regulations. If the investigation finds a violation of this policy has been committed appropriate disciplinary action will be taken, up to and including termination.

**Filing the Complaint**

When filing a formal report of the incident the following should be noted:

- Specific details of the incident
- The nature of the violent or harassing act
- The names of any person(s) who may have witnessed the incident

Reported incidents will be treated as confidentially as possible. In order to properly investigate the incident and offer adequate support to those involved, complete confidentiality cannot be guaranteed. Disclosure may be necessary in conducting the investigation or required by law.

**Disciplinary Action**

If it is determined by the company that any employee has been involved in a violent behaviour, unacceptable conduct, or harassment of another employee, immediate disciplinary action will be taken. Such disciplinary action may involve counselling, a formal warning, or dismissal. **Specific to Province of Alberta:** to be reviewed when an incident occurs related to violence and harassment, if the HSC or HS Rep recommends a review and/or update, and/or at least once annually). Upon determination as to the validity of such claims, the employee shall only then be allowed to return to work with pay or be terminated.

**Support**

Govan Brown will provide support to victims of violence or harassment. Employees who are victims of violence or harassment are encouraged to seek assistance and can be assured that any counselling and/or treatment administered are completely confidential. Consult a health professional (of the worker’s choice) for treatment or referral. Please note that employers cannot make any deductions from the worker’s wages and benefits if the treatment sessions occur during regular work hours. **Specific to Province of Alberta:** Some resources to consider are:

- Alberta Health Services- (403) 367-5000
- Calgary Police Service - 403-266-1234
- Occupational Health and Safety Anywhere in Alberta 1-866-415-8690
- Supports for Albertans Fleeing Abuse - Alberta Works 24-hour line: 1-866-644-5135
- The Distress Center 24-hour crisis line: 403-266-HELP (4357)
- Calgary Counselling Center Telephone: 403-691-5991 (business hours)
- Eastside Family Counseling Center 24-hour crisis line: 403-269-9699 Telephone: 403-299-9696

**Preventative Measures**

- Employees should not enter any situation or location where they feel threatened or unsafe. If they find themselves in a situation where they feel threatened; Govan Brown recommends that they do not attempt to “handle” the situation by themselves.
- The employee should remain calm at all times even if a person becomes adversarial.
- Govan Brown recommends the use of the "buddy system", especially when employees feel that their personal safety may be threatened.
- Govan Brown employees should not work alone and ensure they have contact with their manager.
- Employees should not attempt to restrain a person and should follow established procedures for the prevention and reporting of incidents of violence.
- Employees are encouraged to provide input into incident investigations.

- Workers whose physical safety is threatened by violence, in any form in the workplace, should contact the police immediately. In addition, a worker should report to his or her employer, supervisor or human resources the existence of any situation that has the potential for violence.
- If necessary, employees should call 911 and request the assistance of Police.
- Any incidents of violence that are witnessed or Govan Brown employee must be reported immediately to your manager or human resources representative.
- Workers are encouraged to refuse any unsafe work situation and follow Work Refusal procedures.
- Ensure harassment and violence is part of your hazard assessment every day
- Always stay alert and look around
- Check in regularly if working alone and always ensure your cell phone is charged
- Never leave workers alone with someone they do not know or that is a new work contact
- Maintain physical distancing. Position yourself between people and an exit/ doorway
- Weapons are prohibited so they cannot be used against you
- In late hours of the day do not exit from a secluded, dark doorway
- Avoid poorly lit bus stops that cross alleyways and hiding spots. Do not arrive at bus stop too early
- Do not engage with strangers
- Keep the office door locked when working alone, and vehicle doors locked at all times
- Stay in well lit areas

**Work Refusal**

- All workers have the right to refuse work if they have a reason to believe that they are in danger from workplace violence/harassment. Reprisals by Govan Brown will not occur. Workers are to follow work refusal protocol. Workers will be entitled to be paid their normal wages and benefits while their refusal is being investigated.

**No Reprisal**

- The complainant is assured that no complaint under this policy, made in good faith, will be subjected to reprisal of any kind. However, complaints made in bad faith will render the complainant subject to disciplinary action.
- Reprisals will not be tolerated, and disciplinary action will be taken against those who engage in such activity.
- An individual that submits a complaint in good faith, even where the complaint cannot be proven, will not have been deemed to be in violation of this policy. If, however, an investigation reveals that the complainant made false accusations of workplace harassment knowingly or in a malicious manner, the complainant will be subject to disciplinary action, up to and including termination.
- It is noted that an inconclusive finding by an investigator will not equate to finding the complaint to have been made in bad faith.

**COMMUNICATION**

- Govan Brown Workplace Violence and Harassment Policy, program and procedures located in the Govan Brown health and safety binder and be posted in the workplace H&S safety Boards.
- Govan Brown's Workplace Violence and Harassment Policy, program and procedures will be communicated to all new Govan Brown workers, supervisors, and managers through new employee general orientation or site-specific induction and/ or through periodic management and staff safety meetings or toolbox talk meetings.
- All existing Govan Brown staff will receive orientation through the OHS Program / Occupational Health and Safety Management System (OHSMS) orientation and /or through Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) communication and periodic management and staff safety meetings as well as through periodic and ongoing safety training, internal communication protocols or structured training sessions.
- List of applicable regulations and documentation will be kept in workplace / on project site Safety board and communicated to work parties during the safety meeting, site orientation / toolbox talks.
- This procedure will be made available at the point of use to workers, subcontractors and suppliers upon request.
- The Workplace Violence and Harassment Policy statement itself will be posted at each project site.

## **TRAINING**

- All new managers, supervisors, and workers will receive training Govan Brown Workplace Violence and Harassment Policy, program and procedures during their on-boarding training upon hire.
- All new employees will receive awareness training as part of their orientation on their specific health and safety roles and responsibilities through the new hire orientation process.
- All existing employees will receive training on their health and safety roles and responsibilities through periodic staff OHS Program / Occupational Health and Safety Management System (OHSMS) orientation safety meetings as well as through periodic and ongoing safety training or structured training sessions.
- Verification of training will be confirmed via sign off and may include knowledge verification testing

## **EVALUATION**

- Workplace Violence and Harassment Policy, program and procedures will be reviewed on annual basis by Senior Management and /or during the annual OHS Program / Occupational Health and Safety Management System (OHSMS) internal audit and maybe changed due to business needs, any legal requirements and based on the results of the evaluation to ensure it continues to meet OHS regulation and standards and to ensure it is relevant with current operations and any changes will be indicated in the meetings minutes or reflected on the revision page.
- The Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) and management will also be involved with the evaluation by analyzing forwarded items of concern and suggesting corrective action.
- On a yearly basis, management will review OHS Program / Occupational Health and Safety Management System (OHSMS) to assess whether it is still compliant with current regulations and with the current work environment. If necessary and if required procedure will be amended to reflect the current operation.
- After the year-end audit a thorough analysis of the gaps identified will be conducted by the Internal Auditor & Senior Management will develop an action plan that addresses the deficiencies with an overall goal of continual improvement.
- Senior Management at least annually or more often as required should review and validate company Document Control Master List with indication supporting documents needed to implement, monitor and maintain active OHS Program / Occupational Health and Safety Management System (OHSMS) effectively and assess conformance with business, corporate and legal requirements as well as compliance with applicable standards.
- Document Controller or Designee will coordinate and manage Document Control Register to ensure changes to, and current versions status of, documents are identified and tracked in order to prevent the unintended use of obsolete documents and identify such documents if they are retained for any purpose

## **CONTINUAL IMPROVEMENT**

During periodic report evaluations, safety meetings, and yearly audits, Govan Brown will evaluate the Workplace Violence and Harassment Policy, program and procedures through the audit and if necessary, an action plan will be created to improve or raise the standard addressing any identified gaps or areas of improvement.

## **REFERENCE**

Occupational Health and Safety Act R.S.O. 1990  
OHS Program / Occupational Health and Safety Management System (OHSMS)  
Document Control Master List  
Document Control Register  
Workplace Violence and Harassment Policy Statement  
Workplace Violence and Harassment General Environment Risk Assessment  
Injury, illness & incident reporting chart  
Occupational Health & Safety Risk Registry (OH&S RR)  
Construction Hazard Assessment (CHA)

**RETURN TO WORK & WORKER REINTEGRATION POLICY STATEMENT**

Govan Brown Associates Limited is committed to the safe return to work for any workers who have sustained workplace injuries while employed by Govan Brown Associates Limited. Through the Return to Work program (RTW), Govan Brown Associates Limited will provide gainful employment to workers in the event of a disabling workplace injury to accommodate the needs of the worker to the extent of undue hardship.

Supervisors and foremen are responsible to participate in the implementation of the RTW program where and when it is required. Once a worker has been placed on the RTW program, the supervisor and/or foreman will be responsible for follow-up with the program, constant communication with the worker, and updating the safety manager, where required.

The RTW program has two main functions:

1. To prevent workers from losing time due to workplace injuries (achieved using the WSIB Functional Abilities Form, provided at the initial stage by the treating medical physician).
2. To return workers to gainful employment as soon as medically authorized through permanently modified work or temporary modified work, as may be required by WSIB.

Workers are responsible to report all workplace injuries or incidents to their immediate supervisor. Workers are also responsible to ensure all medical visits are reported to the employer and applicable forms are filled out and returned to the employer, health care practitioner or WSIB, when required. Workers are expected to participate in the RTW program with their supervisor and encourage maintaining active two-way communication to ensure the success of the RTW program.

Govan Brown Associates Limited and supervisors will receive copies of the RTW program and participate in an orientation and instructional training session to ensure full understanding of the RTW program. In addition, all Govan Brown Associates Limited employees will be made aware of the RTW program during their orientation/training session.

In addition to my commitment to health and safety, I am committed to ensuring an early and safe return to work for any worker suffering from a disabling workplace injury and provide a modified work program to any of our injured employees until he/she is able to return to their pre-accident job, wherever possible.



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Colin Gray

President – Govan Brown Associates Limited

March 22/24

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Date

## **EARLY AND SAFE RETURN TO WORK PROGRAM & PROCEDURE**

### **PURPOSE**

Govan Brown developed, implemented and maintain Early and Safe Return to Work Program (ESRTW) with provision of framework for the organization and the worker to co-operate in developing the return to work process and worker reintegration to accommodate the needs of the worker to the extent of undue hardship as set out under the Workplace Safety and Insurance Act (WSIA) Ontario Human Rights Code and/or Canadian Human Rights Act.

Govan Brown as the employer with co-operation and re-employment obligations (if applicable) has a duty to modify the work to accommodate the needs of the worker to the extent of undue hardship and when Govan Brown as the employer has control of the workplace, it also has a duty to modify the workplace as required by the worker, to the extent of undue hardship.

In cases where a job is or becomes available that can be made suitable through accommodation, and the accommodation does not cause the employer undue hardship, Govan Brown as the employer will make every reasonable effort to provide temporary or permanent accommodation to allow the worker to remain at or to return to work, and ensure compliance with WSIA and the applicable human rights legislation and providing workers protection from discrimination on a number of grounds including disability, sex (pregnancy, gender identity), creed, ethnicity, family status and age.

### **SCOPE**

This policy and program apply to all Govan Brown sites and activities, and to all Govan Brown employees working for the company. This document must be read and used in conjunction with Govan Brown Occupational Health and Safety Program and associated standards.

When applying practices and procedures to meet the needs set out in this document, all relevant legislation must be complied with.

Procedures will be applicable company wide and include:

- Roles and responsibilities related to return to work and worker reintegration (RTW & WR).
- Outline Senior Management commitment for RTW & WR obligations.
- Early and Safe Return to Work (ESRTW) package (also known as Workplace Injury Package)

## **ROLES AND RESPONSIBILITIES**

### **MANAGEMENT**

- Draft the Return To Work & Worker Reintegration Policy
- Ensure the current Return to Work & Worker Reintegration Policy statement is posted and communicated to Govan Brown workers
- Effectively initiate and monitor the ESRTW Program with modified work or the workplace to accommodate the needs of the worker to the extent of undue hardship as established under the Workplace Safety and Insurance Act (WSIA), Ontario Human Rights Code and/or Canadian Human Rights Act.
- Cooperating in the injured worker's early and safe return to work; minimizing the human and financial impacts, by focusing on getting the injured employee back to safe and productive work as soon as medically possible.
- Ensuring that restoring the injured/illness employees' source of income, staying active and productive, both of which are important to the healing/recovery process.
- Offer to re-employ employees who are medically fit to return to the essential duties of their pre-injury job or suitable work that is safe, productive, consistent with the worker's functional abilities, and that restores the worker's pre-injury earnings, to the greatest extent possible as established with the Workplace Safety and Insurance Act (WSIA) and the applicable human rights legislation.
- Ensure work parties cooperation in:
  - o initiating early contact
  - o maintaining appropriate communication throughout the worker's recovery
  - o identifying and securing work reintegration opportunities for the worker
  - o giving the Workplace Safety and Insurance Board (WSIB) all relevant information concerning the worker's work reintegration, and
  - o notifying the WSIB of any dispute or disagreement concerning the worker's work reintegration.
- Conduct an annual review of the program, identify gaps or areas of improvement develop and implement action

**SUPERVISORS**

- Ensure that the injured worker receives prompt medical attention in the event of an injury/illness occurring at the workplace.
- Conduct an accident investigation if applicable and elaborate any recommendations to prevent a reoccurrence.
- Effectively cooperate and support ESRTW Program with modified work or the workplace to accommodate the needs of the worker to the extent of undue hardship.
- As appropriate contact the injured employee and present Offer of Modified Duties to Employee.
- Complete Modified & Suitable Work Offer and retains a copy on record in files.
- Ensures that the worker received the Workplace Injury Package containing copies of form:
  - Offer of Modified Duties
  - ESRTW Letter for Healthcare Professional
  - Weekly or otherwise completed Modified Work Follow Up Form
  - ESRTW Contact Log
  - Physical Demands Analysis
  - Modified Work Job Tasks
- Completed relevant forms from issued Workplace Injury Package as required.

**CLAIMS ADMINISTRATOR**

- Create Physical Demand Analysis form for all job titles which workers have been involved in workplace injuries.
- Complete and submit WSIB form 7 to report the injury to WSIB within 3 days.
- Record of all communication regarding claims

**WORKERS**

- Report all work-related injuries/illnesses to their supervisor as soon as possible.
- Inform the employer as soon as possible after seeing the physician as a result of a workplace injury/illness if worker seeks medical help after leaving the workplace.
- Obtain Workplace Injury package and forms if the injured worker requires medical attention outside of company premises.
- Awareness, understanding and acknowledgement of Govan Brown Early and Safe Return to Work Program (ESRTW).
- Participate with development of ESRTW Program with maintaining regular contact with direct Manager and/or designate
- Communicate any concerns or problems to their immediate supervisor.
- Obtain the necessary forms from the treating agencies as may be required by the employer. The employee may be responsible for the costs of any forms that are required.
- To ensure that participation and cooperation in 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 the WSIB and Govan Brown.
- Report immediately any material changes to direct Supervisor.

**CONTRACTOR/SUBCONTRACTOR**

- Create relevant return to work programs and procedures.
- Monitor the ESRTW Program with modified work or the workplace to accommodate the needs of the worker to the extent of undue hardship.
- As appropriate contact the injured employee and present Offer of Modified Duties to Employee.
- Complete Modified Work Job Tasks Form or equivalent and retains a copy on record as an attachment.
- Participate with development of ESRTW Program with their employee and inform Govan Brown as appropriate.
- Create Physical Demand Analysis form for all job titles which workers have been involved in workplace injuries.
- Complete and submit WSIB form 7 to report the injury to WSIB within 3 days.
- Co-operate with all requests for documentation as required by the WSIB.



## PROCEDURE

Govan Brown will ensure that a one-page, clear and concise Return to Work & Worker Reintegration Policy Statement is created and includes:

- Requirements of Commitment
- Intent of the ESRTW Program
- Date and signature of the most senior Govan Brown executive

The policy statement will be supported by the established ESRTW Program with that will also reflect framework for the Employer's obligation to re-employ begins when it is notified that an injured worker is medically able to perform:

- the essential duties of his or her pre-injury job
- suitable construction work, or
- suitable non-construction work

Govan Brown as the employer in cooperation with worker and WSIB will strive to return the worker to a job that:

- they have the skills to perform
- is safe, productive, and consistent with their functional abilities and
- restores their pre-injury earnings to the extent possible.

The RTW opportunity selected for the worker must take into account any required accommodations, and may be adjusted as required throughout the worker's recovery and impairment period.

Following notification, the employer must offer to re-employ the injured worker in the first job that becomes available that is consistent with the worker's medical ability to return to work.

The employer's offer of work must take into account its obligation to accommodate the work or the workplace to the needs of the worker, to the extent that the accommodation does not cause the employer undue hardship.

Employer's obligation to re-employ continues until the earliest of:

- two years from the date of injury
- one year after the worker is medically able to do the essential duties of the pre-injury job
- the date the worker declines an offer of work, or
- the date the worker reaches age 65

Govan Brown will maintain contact with the employee via the employee's direct supervisor or designate, who will ensure:

- Immediate follow-up on the next scheduled shift in person, or via telephone call following the notification of incident/illness/occurrence
- Weekly review of the modified duties will be conducted using the (ESRTW) package or Contact Log equivalent
- Written or electronic communication directly to the employee will be made when required (i.e., Offer of Modified, Schedule of Meetings, Meeting outcomes)

Govan Brown will ensure that adequate Medical Monitoring and Treatment take place:

- Regular use of the WSIB Functional Abilities Form (FAF) will be used as a means of medical monitoring and treatment awareness
- Requesting update FAF's will be determined on a case-by-case basis by the HR or Health and Safety Department

Govan Brown will establish provisions for Modified Duty and review the restrictions outlined by the attending physician and determine if the employee's regular job duties are within the restrictions. Where possible, the pre-injury job may be modified in some form, such as, but not limited to:

- Physical modifications
- Redesigning the job environment
- Reducing hours and/or volume of work
- Receiving assistance from co-members for more difficult tasks

The use of the written Offer of Modified Duties Form will be provided to confirm the duties and responsibilities outlined.

If modified duties have been recommended, the supervisor will arrange for the appropriate or designate member to meet and discuss the following considerations:

- Determine if the modified work will be temporary or permanent.
- Determine if the work is beneficial to both employer and the employee.

### **Duty to Accommodate**

During the RTW process, Govan Brown and, when relevant, unions and workers are expected to comply with the Ontario Human Rights Code, and for federally regulated employers, the Canadian Human Rights Act.

Govan Brown with co-operation and re-employment obligations (if applicable) have a duty to modify the work to accommodate the needs of the worker to the extent of undue hardship. If the Govan Brown has control of the workplace, they also have a duty to modify the workplace as required by the worker, to the extent of undue hardship.

If a worker can perform the essential duties of their pre-injury job with accommodation, or if a job becomes available that can be made suitable through accommodation, and the accommodation does not cause the Govan Brown undue hardship, Govan Brown will provide the accommodation to allow the worker to remain at or return to work. A worker's accommodation requirements may be temporary or permanent.

During the co-operation and re-employment obligation periods, Govan Brown may have accommodation requirements beyond the work-related injury/disease. Human rights legislation protects workers from discrimination on a number of grounds including disability, sex (pregnancy, gender identity), creed, ethnicity, family status and age.

### **Accommodation**

An accommodation can be a modification to the terms and conditions of the work or the workplace (e.g., reduced hours, provision of assistive devices) that results in a job that is consistent with the worker's functional abilities.

Accommodation is an individualized process and fact dependent, taking into account the nature of the work/workplace, the worker's abilities and limitations, and the essential duties and requirements of the worker's pre-injury job and other jobs with the injury employer.

In addition, when determining whether existing suitable work or alternative work is available when offered at a worksite location that is not the pre-injury worksite following factors should be considered, whether:

- the distance to travel to an alternate worksite location is reasonable, taking into account both the mode(s) of travel available to the worker and the amount of travel that was required before the injury
- the worker's injury restricts their capability to travel safely, and
- the job offered at an alternate worksite is more suitable than work available at the pre-injury worksite.

### **Undue hardship**

When determining what constitutes undue hardship, the Ontario Human Rights Code provides that consideration is given to:

- the cost of accommodation
- the health and safety needs of employees and/or customers, and
- any outside sources of funding that may be available to the employer.

If the employer believes that accommodating a worker would result in undue hardship, the employer is expected to provide supporting evidence to demonstrate this (e.g., a cost-benefit analysis that includes the long-term financial impact if the claimed undue hardship is financial).

If the WSIB determines that a proposed accommodation would create undue hardship, the employer is not required to provide that accommodation. However, the employer is required to consider if there are other options that would accommodate the worker without undue hardship.

### **WSIB financial support for accommodation**

In cases where the expense to accommodate the work or the workplace will result in undue hardship for an employer, the WSIB will consider paying for a portion or the entire cost of the accommodation. The WSIB will provide financial support if this allows the worker to return to their pre-injury job or a permanent suitable job within the worker's abilities, and restores the worker's pre-injury earnings to the greatest extent possible.

**Offer of Modified Duties**

Letter to initiate the offer of modified to a worker in writing included into Workplace injury package. Worker has to indicate acceptance or non-acceptance with signature and date.

**Health Care Professional**

Template letter from the Supervisor to the Health Care Professional is included into Workplace injury package to provide awareness and intent of ESRTW Program.

**ESRTW Contact Log**

To be completed by Govan Brown member for discussions or actions taken during the claim.

**Physical Demands Analysis**

Determination of requirements for the worker performing regular job duties.

**Modified Work Job Tasks**

List of duties and description of tasks requesting to be performed.

**Worker Reintegration**

The Employer with assistance of the direct Supervisor, Employee and (if required) a designate of the WSIB will help ensure successful reintegration of the worker into the workplace. Upon return to work the following is recommended:

- Review the modified job duties with the employee.
- Assure the employee that they will be able to return to the normal job function, once given a clearance from the physician or WSIB Representative.
- Instruct the employee to not exceed the physical restrictions outlined by the physician or treating health care provider.
- Instruct the employee to immediately notify the direct supervisor of any difficulties encountered while on the modified duty program.
- The injured employee must be advised of changes made to the work area such as additional safety precautions, temporary modifications as per the modified work job description.
- Once the instructions are given to Govan Brown must observe the employee for a period of time to ensure that the work performed does not exceed the employee's physical restrictions and that no difficulties are encountered.
- Once the employee has been re-integrated into the workforce, an integral aspect of the Modified Duties program will be the follow-up. Through follow-up, Govan Brown will be able to evaluate the progress of the employee and the effectiveness of the modified duties.
- Ongoing communication with meetings and discussion between Govan Brown and Employee will continue while on perform Modified Duties program. The follow-up reviews with the employee using the modified work follow-up form and/or Written Offer of Modified form will be used.
- In cases where suitable and available work with the employer is unsuccessful a Work Transition Assessment may be implemented by the WSIB. This assessment is usually provided six to nine months following the date of injury, or as soon as the worker is fit to return to suitable work.
- Upon completion of an assessment the WSIB may develop a Work Transition Plan which outlines activities designed to optimize the worker's current skills or provide the worker with new skills to prepare the worker for employment in a suitable occupation. The employee and employer will cooperate fully with the WSIB in the development of work transition plans and any training requirements. This work transition plan will be signed by the worker, the WSIB and an authorized manager for the employer (if applicable). There is a special provision for older workers; for qualified workers over 55 there is an option that allows them to either participate in a work transition plan with the WSIB, or opt to self-direct their own plan over a period of 12 months and find employment on their own.
- All work transition reasonable expenses are compensated by the WSIB according to established policies, schedules and documentation, and an estimate of the plan may be sent to the participating employer for review. All ongoing expenses will be reviewed and monitored by the employer using the WSIB accident costs statements and protocol.

- If no suitable occupation (SO) is available with the employer, or in the local labour market, WSIB may offer relocation services as part of the work reintegration program. In the process of identifying available work, the WSIB will look:
  - first, to a SO with the employer in the local labour market, or in the surrounding area with a reasonable commute for the worker;
  - then, to a SO with a new employer in the local labour market, and
  - finally, to a SO with a new employer in the broader labour market.

**Reporting Requirements to WSIB**

Reporting requirements with regards to the WSIB will be met and include reporting in the following circumstances: wage changes, change in duties, and change in the duration of the return to work program, failure of the injured person to cooperate, and the end of the modified work program.

Use of the WSIB Form 7 or appropriate/additional WSIB forms due to an employee injury/illness:

- Is absent from regular work
- Earns less than regular pay for regular work (e.g., part-time hours)
- Requires modified work at less than regular pay
- Requires modified work at regular pay for more than seven calendar days following the date of accident.

**Work Transition Expenses**

- The WSIB pays for expenses that it considers appropriate to enable the worker to engage in the RTW assessment and RTW plan.
- A worker entitled to benefits under the insurance plan is entitled to such health care as may be necessary, appropriate, and sufficient as a result of the injury.
- Generally, workers receive health care at the office or facility of the health care practitioner. In some cases, the WSIB must pre-approve the worker’s health care, as well, the WSIB must pre-approve treatment from a health care practitioner who is not registered with the WSIB.
- If there are health care practitioners available in the worker’s region, the WSIB does not expect the worker to travel outside of his/her region to obtain care. As well, the WSIB does not expect a health care practitioner to travel to the worker’s region to provide care.
- However, there may be situations when workers are entitled to emergency or elective health care outside the province as a result of a work-related injury or an occupational disease. If the WSIB approves such care, it is provided and paid for at a rate that the WSIB determines is proper and reasonable.
- The WSIB pays temporary total disability/loss of earnings benefits to workers who incur a wage loss due to absence from work for health care reasons.
- The WSIB may enter into agreements with preferred suppliers for the provision of health care products/services to injured workers.
- The WSIB expects Ontario workers to use preferred suppliers when the WSIB has entered into such agreements. Use of preferred supplier(s) ensures a worker will not have to pay when obtaining a health care product/service that is required as a result of a work-related injury/disease and for which there is entitlement in his or her claim. The preferred supplier(s) will submit the bill directly to the WSIB for payment.
- The WSIB pays all reasonable expenses incurred when, on the direction or approval of the WSIB, a worker, or another person designated by the WSIB, must travel in relation to a claim.
- The WSIB only pays the cost of public transit fares when public transportation is available in worker area, and work injury/illness does not prevent worker from using public transit.
- Mileage and parking is paid when there is no public transit available, the medical precautions for work injury/illness prevent worker from travelling by public transit, or travelling by transit is agreed by the WSIB to be impractical.
- Travel by taxi requires prior approval, and is only allowed when the medical precautions for work injury/illness prevent worker from taking public transit or driving worker own vehicle. If appropriate, the WSIB can pre-arrange direct billing of taxi services with a preferred company.
- When required to lodge away from home while keeping an appointment or participating in a program authorized by the WSIB, accommodation expenses (hotel, or room and board) require pre-approval and are paid at approved rates.

- Meal allowances are paid at approved rates if workers are required by the WSIB to lodge away from home, attend scheduled appointments, out-patient health care programs, etc. Meal expenses require pre-approval, and generally are paid for out-of-town travel.
- If claiming expenses for monthly transit passes, parking, taxis, meals, books, room and board, and accommodations original receipts must be submitted to the WSIB according to established policies, schedules and documentation.
- Training and educational expenses, such as text books and tools require pre-approval.
- Travel expenses for an escort are paid when there is a clinical necessity, or for compassionate or practical reasons.
- If a worker is unable to travel due to the work-related medical condition, payment of travel and related expenses is extended to enable one family member to visit the worker.

## **COMMUNICATION**

- Govan Brown Return to Work & Worker Reintegration Policy, program and procedures located in the Govan Brown health and safety binder and be posted in the workplace H&S safety Boards.
- Govan Brown's Return to Work & Worker Reintegration Policy, program and procedures will be communicated to all new Govan Brown workers, supervisors, and managers through new employee general orientation or site-specific induction and/ or through periodic management and staff safety meetings or toolbox talk meetings.
- All existing Govan Brown staff will receive orientation through the OHS Program / Occupational Health and Safety Management System (OHSMS) orientation and /or through Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) communication and periodic management and staff safety meetings as well as through periodic and ongoing safety training, internal communication protocols or structured training sessions.
- This procedure will be made available at the point of use to workers, subcontractors and suppliers upon request.
- The Return to Work & Worker Reintegration Policy statement itself will be posted at each project site.

## **TRAINING**

- All new managers, supervisors, and workers will receive training Govan Brown Return to Work & Worker Reintegration Policy, program and procedures during their on-boarding training upon hire.
- All new employees will receive awareness training as part of their orientation on their specific health and safety roles and responsibilities through the new hire orientation process.
- All existing employees will receive training on their health and safety roles and responsibilities through periodic staff OHS Program / Occupational Health and Safety Management System (OHSMS) orientation safety meetings as well as through periodic and ongoing safety training or structured training sessions.
- Verification of training will be confirmed via sign off and may include knowledge verification testing

## **EVALUATION**

- Return to Work & Worker Reintegration Policy, program and procedures will be reviewed on annual basis by Senior Management and /or during the annual OHS Program / Occupational Health and Safety Management System (OHSMS) internal audit and maybe changed due to business needs, any legal requirements and based on the results of the evaluation to ensure it continues to meet OHS regulation and standards and to ensure it is relevant with current operations and any changes will be indicated in the meetings minutes or reflected on the revision page.
- The Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) and management will also be involved with the evaluation by analyzing forwarded items of concern and suggesting corrective action.
- On a yearly basis, management will review OHS Program / Occupational Health and Safety Management System (OHSMS) to assess whether it is still compliant with current regulations and with the current work environment. If necessary and if required procedure will be amended to reflect the current operation.
- After the year-end audit a thorough analysis of the gaps identified will be conducted by the Internal Auditor & Senior Management will develop an action plan that addresses the deficiencies with an overall goal of continual improvement.

- Senior Management at least annually or more often as required should review and validate company Document Control Master List with indication supporting documents needed to implement, monitor and maintain active OHS Program / Occupational Health and Safety Management System (OHSMS) effectively and assess conformance with business, corporate and legal requirements as well as compliance with applicable standards.
- Document Controller or Designee will coordinate and manage Document Control Register to ensure changes to, and current versions status of, documents are identified and tracked in order to prevent the unintended use of obsolete documents and identify such documents if they are retained for any purpose

**REFERENCE**

Occupational Health and Safety Act R.S.O. 1990

OHS Program / Occupational Health and Safety Management System (OHSMS)

Document Control Master List

Document Control Register

Return To Work & Worker Reintegration Policy Statement

Workplace Injury Package

- Offer of Modified Duties
- ESRTW Letter for Healthcare Professional
- Weekly or otherwise completed Modified Work Follow Up Form
- ESRTW Contact Log
- Physical Demands Analysis
- Modified Work Job Tasks

## MANAGEMENT REVIEW AND CONTINUAL IMPROVEMENT POLICY STATEMENT

Govan Brown Associates Limited senior management is vitally interested in the health and safety of every employee. Our philosophy is that the well-being of our company depends on the health and safety of our workforce.

To enable us to keep our quality and production at the highest levels, we must ensure that the health and safety of our workforce is maintained at all times. To achieve this goal, we shall endeavor to develop, implement and evaluate our health and safety program to be as effective as possible.

Govan Brown Associates Limited senior management will:

- Ensure that the workplace parties, including workers, supervisors and managers, have the time, resources and competency to implement the health and safety management program and to achieve its policy, objectives and targets.
- Make health and safety an organizational priority similar to other priorities and integrates the management system into all aspects of the organization.
- Monitor and evaluate the suitability, adequacy and effectiveness of the health and safety program with progress evaluation towards the company health and safety objectives and evaluates the effectiveness of follow-up actions from earlier management reviews.
- Promote participation of, and seeks feedback from, all workplace parties in developing, implementing and maintaining the health and safety management program, and recognize the value of these contributions including information from the system evaluations, worker input, investigation results, corrective and preventive actions records, reports and any other information that may be of benefit.

The overall effectiveness of continual improvement including corrective actions and recommendations taken as well as the overall progress towards achieving corporate level improvement objectives will be assessed through our management review and continual improvement process.

Govan Brown Associates Limited senior management is committed to ensure continual improvement of the health and safety and implemented health and safety program will be evaluated to assess the suitability, adequacy, and effectiveness of the program. This will be completed annually as minimum, or more often as necessary, to make revisions as required.

All management reviews will be documented and recorded including observations, conclusions, recommendations and action plans for further necessary action from the review.

If any corrective action must be taken, senior management will follow up to ensure that the action was effectively implemented.



Colin Gray

President – Govan Brown Associates Limited

March 22/24

Date

**MANAGEMENT REVIEW AND CONTINUAL IMPROVEMENT PROGRAM & PROCEDURE****PURPOSE**

Govan Brown senior management is committed to ensure the continual improvement of the active Health and Safety Program and implemented Management Review and Continual Improvement Policy in order to ensure this continuous improvement process where the occupational Health and Safety Program is monitored and evaluated to assess the suitability, adequacy, and effectiveness of the program.

Management Review and Continual Improvement Policy will ensure that a review of the Govan Brown Health and Safety Management System and program is completed through:

- The monitoring and examination of all the elements of Govan Brown Health and Safety Management System and program to determine the level of implementation and its effectiveness and efficiency including the information from the system evaluations, investigation results, documentation review, observations and input from senior management, supervisors and workers.
- Periodic review of the Health and Safety Program as per established policy of conducting periodic reviews (minimum on an annual basis) of the Health and Safety Management System and program by senior management in order to ensure continual improvement by evaluating the suitability, adequacy and effectiveness of the health and safety system and program.
- Outlining the aspects, inputs and outcomes addressed during the periodic review process and elaboration of action plan to address any non-conformities and identify opportunities for improvement to the Health and Safety Management System and program.
- Development of annual Health and Safety objectives and their communication throughout the company.
- Establishment and monitoring of key performance indicators (KPIs) to track the performance of the Health and Safety Management System and program.

**SCOPE**

This program and framework apply to all of Govan Brown workplaces and operations within Canada and address:

- Continuous improvement by evaluating the suitability, adequacy and effectiveness of the Govan Brown Health and Safety Management System and program.
- Fulfillment of legal responsibilities as well as the requirements for compliance with the Certificate of Recognition (COR™) Program through conducting an annual Health and Safety Management System Internal Audit with review and evaluation of all 19 elements of the Health and Safety Management System and program.

**ROLES AND RESPONSIBILITIES****SENIOR MANAGEMENT**

- Establish company annual health and safety objectives and ensure adequate communication of the annual health and safety objectives throughout the company.
- Ensure evaluation of progress towards OHS objectives and their accomplishment status.
- Establish key performance indicators (KPI's) to monitor progress of achieving the health and safety objectives as well as monitor performance of the health and safety system and program.
- Effectively initiate and monitor the Health and Safety Management System and program elements.
- Appoint the Internal Auditor for the Company and support the Internal Auditor in their role and ensures that the internal audit is performed as required, at minimum annually.
- Hold periodic reviews to evaluate the effectiveness and efficiency of the Health and Safety Management System and program elements, health and safety system KPI's and level of health and safety objective achievement.
- Prepare and distribute a notice on an annual basis to all employees of the purpose for the review and or audit, with any requirements and means of distribution (i.e. meetings, tool box talks, and memo).
- Conduct a formal review of all Health and Safety Management System and program elements and review the audit report and supporting evidence with the auditor.



- Implement corrective actions using the action plan to address any deficiencies or shortfalls identified during the review and or audit of Health and Safety Management System and program elements, health and safety KPI's and health and safety objectives progress.
- Implements corrective actions where deficiencies are identified using the action plan to address any deficiencies or shortfalls identified during the review of the KPI's and health and safety objective progress.
- Identify overall action plan for all Health and Safety Management System and program elements and or audit, which will be reviewed at a senior management meeting and approval will be reflected in the minutes and meeting sign-off.
- Retain records of any senior management review meetings, internal /external audits, action/corrective actions plan and communication records. Records are to be retained for at least 3 years.

**HEALTH AND SAFETY MANAGEMENT SYSTEM COORDINATOR OR DESIGNATE**

- Prepare management review meeting documentation and record management review minutes and action plans.
- Prepare all required KPI's and relevant trend analysis reports to be presented during management review.
- Implement and communicate corrective actions resulting from the management review meetings.
- Complete the review/revision tracking while reviewing the system procedures for adequacy.

**INTERNAL AUDITOR**

- Administer and oversee the Govan Brown COR™ program and determine the audit scope and complete the audit plan for review in the pre-audit meeting with Senior Management and auditees.
- Complete and submit the Govan Brown COR™ Internal Audit and the supporting documentation by the anniversary date with completion pre and post audit meetings.
- Develop a written corrective/preventive action plan (CAPA) to ensure continuous improvement.
- Provide additional audit information to the External Auditor if requested.
- Act as the liaison person between the Govan Brown and IHSA for the COR™ program.
- Comply with COR™ program guidelines and perform to industry standards and ethical practices.
- Close out issued CAPA after verification that the corrective action taken was effective at addressing the non-conformity.
- Complete an Internal Audit Summary Report prior to having the post audit meeting. Discuss the findings from the internal audit with Senior Management during the post audit meeting.

**SUPERVISORS**

- Aware, understand and acknowledge Govan Brown Management Review and Continual Improvement Policy and procedural framework and communicated internal /external audit action plan(s).
- Lead and coordinate implementation of identified and communicated corrective actions.
- Complete corrective actions as requested by management.
- Promote safety culture in workplace.

**WORKERS**

- Aware, understand and acknowledge of the Govan Brown Management Review and Continual Improvement Policy and procedural framework and communicated internal/external audit action plan(s).
- Cooperate and participate in the implementation of identified corrective actions.

**CONTRACTOR/SUBCONTRACTOR**

- Ensure appropriate communication is made to direct reports.
- Retain all required site-specific documents for report and submission to Govan Brown.
- Aware, understand and acknowledge of Govan Brown Health and Safety Management System and program and internal/external audit goals and outcomes.

**PROCEDURE**

**H&S PROGRAM AND PERFORMANCE EVALUATION**

Senior management review will be conducted on an annual basis that includes the evaluation of all elements of the Health and Safety Management System and program:

- H&S Policy Statement and program
- Hazard Assessment & Analysis policy & program
- Controls policy & program: Safe Work Practices, Safe Job Procedures, Occupational Health
- Procurement and Contractor Management policy & program
- Company Rules & Progressive Disciplinary policy & program
- Personal Protective Equipment policy & program
- Preventive Maintenance and Workplace Inspection policy & program
- Training & Communication policies & programs
- Investigations & Reporting policy & program
- Emergency Preparedness, First Aid policy, program & ERP
- Statistics & Records policy & program and trend analysis and monitoring
- Legislation policy & program and applicable regulations
- Health & Safety Representative /JHSC/JOHSC policy & program
- Workplace Violence & Harassment policy, program and risk assessment
- Return to Work policy & program
- Management Review and continual improvement policy, program and action plans
- Management of Change (MOC) policy & program
- Document and Records control protocols

The annual Senior Management review will evaluate the efficiency of the entire Health and Safety Management System, encompassing all program elements. It will also take into account a diverse array of **inputs**, extending beyond specific elements, and not limited to, the following:

- Follow up and validation status of actions and outcomes from previous management reviews
- Results and reports of internal / external audits including communication and outcomes for opportunities for improvement and recommendations
- Evaluation status of actions and compliance with legal requirements including verification of corrective actions as a result of enforcement authority interventions, regulatory bodies inspections & investigations, compliance orders and prosecutions
- Progress in the risks reduction arrangements with evaluation effectiveness of processes and procedures to identify hazards, assess, and prioritize risk and addressing underlying causes, controls implementation and system deficiencies
- Employees feedback and reports including recommendations and outcomes from participation and consultation with Health & Safety Representatives (HSR) / Joint Health and Safety Committees (JHSC) /Joint Occupational Health and Safety Committee (JOHSC)
- Identified barriers to worker participation in the OHSMS and corrective actions and measures effectiveness evaluation including but not limited analysis of trends and training needs, internal communication protocols, performance plans, goals, milestones and incentives, allocated time, resources as well as administration and even accountability
- External parties' information, communication and guidelines including strategic plans, initiatives, programs, enforcement campaigns and monitoring arrangements from external parties such as: Ministry of Labour, Training and Skills Development (MLTSD), Infrastructure Health & Safety Association (IHSA), Workplace Safety and Insurance Board (WSIB), Canadian Standards Association (CSA) and any other federal / provincial regulative authorities or sector specific regulators
- External benchmarking data analysis and comparison against other companies / competitors, other industries/ industrial sectors, best known practices amongst similar business or insurance reports, recommendations and guidelines
- H&S performance statistical records and trends analysis reports and communication including proactive and reactive monitoring outcomes and evaluation of leading & lagging Key Performance Indicators (KPI's)
- Internal data and records including but not limited workplace inspections, hazard assessments, incident reports, statistical reports, near misses, first aid / medical treatment cases, enforcement authorities noncompliance orders with validation status of implemented corrective and preventive actions and their effectiveness together with evaluation alignment with the strategic direction as well as suitability, adequacy and effectiveness of the company Health and Safety Management System and program

- Evaluation of action plans progress, milestones and achievements towards the accomplishment of company measurable H&S objectives and targets
- Evaluation of the extent to which OHS objectives have been met, including an analysis of the target outcomes and their actual attainment.
- Changing circumstances, including introduction of new/updated legislation, emerging technology, changes in industrial codes/standards, competitors' activity, developments in legal and other requirements related to OH&S (changes in business conditions, organizational structures, security measures, staffing resources, materials and services as well as conflicting priorities, legal and other requirements).
- Recommendations for improvement and decisions on measures, actions, budgets and resources allocation for continual improvement of integrated Health and Safety Management System and supports both H&S goals
- and business needs and strategies

Based on annual and/or periodic Senior Management reviews and evaluation effectiveness of all elements of the Health and Safety Management System and program as well as analysis of the above mentioned the inputs, at the conclusion of the review Senior Management will determine outcomes on how to improve performance of Health and Safety Management System and program.

The results of the Senior Management review will consist of decisions and directives pertaining to the sustained adequacy, effectiveness, and suitability of the Health and Safety Management System and program elements in achieving their intended outcomes and identifying opportunities for continuous improvement. Additionally, the review will determine the necessary resources and ensure their alignment with the company's business needs and overall strategic direction.

The **outputs** of the annual and/or periodic Senior Management reviews will encompass various aspects, including, but not limited to:

- Needs for changes to the company policies, statements of intent, procedural framework, priorities, objectives, resources, or other elements of Health and Safety Management System and program
- Revision, update and approval of policies, statements of intent and procedural framework within Health and Safety Management System and program
- Elaboration of new elements of Health and Safety Management System and program or standard operating procedures or protocols for further participation and consultation with Health & Safety Representatives (HSR) / Joint Health and Safety Committees (JHSC) / Joint Occupational Health and Safety Committee (JOHSC)
- Setting, prioritisation and approval of measurable Occupational Health & Safety (OHS) objectives and targets together with action plan(s) specifying responsible personnel/departments and target dates towards their achievement and accomplishment aligned with the strategic direction
- Identification and allocation required methods and arrangements, time frames, budgets and resources for continual improvement of sustainable, adequate and effective integrated Health and Safety Management System to support OHS objectives, goals and targets as well as business needs and strategies
- Identification and allocation of measures to remove barriers preventing workers participation in Health and Safety Management System and program and to avoid uneven accountability and absenteeism with elaboration of internal protocols, adjustment of performance incentives and motivation programs to encourage active workers participation and two-way communication as well as to promote and support positive safety culture and Internal Responsibility System
- Identification, agreement and establishment of formal communication channels, systems and methods to ensure measurable OHS objectives, goals and action plan(s) communicated and transmitted to workers, workers representatives and relevant work parties

Health and Safety Management System Coordinator or Senior Management designate will monitor the KPIs and schedules senior management review meetings to discuss the performance of the Health and Safety Management System and program as well as the status of health and safety objectives.

Senior Management review meetings will discuss Health and Safety Management System and program performance, outcomes and results of Health and Safety Management System and program elements review/audit and progress of health and safety objectives and action plan(s).

As a result of the annual review, an action plan will be developed based on identified deficiencies/non-conformity to Govan Brown Health and Safety Management System and program.

Changes to the Health and Safety Program Manual with latest revision to the documentation will be communicated to workers, workers representatives and distributed to relevant workplace parties.

An approved, prioritized action plan (completed with assignment of responsibility and anticipated implementation dates) as well as objectives will be elaborated and communicated to all Govan Brown staff. This will be accomplished in any or all the following manners:

- At a regular company meeting,
- Safety committee(s) meeting
- During tool box talks
- At site progress meetings
- Memo/newsletter to all staff acknowledging the results of the formal review/evaluation and thanking everyone for their support and participation

Senior Management review, develop and communicate the annual health and safety objectives and establishes KPI's to monitor the health and safety system performance. Objectives must be SMART:

- Specific
- Measurable
- Achievable
- Realistic
- Time bound

Govan Brown will retain documented information as evidence of the results of management reviews.

Records of the annual/periodic Senior Management review, evaluation of H&S performance and OHS objectives progress with associated action plan(s) as well as internal /external audits reports, action/corrective actions plan(s) and communication records are to be retained for at least 3 years.

**INTERNAL AUDIT**

Internal audits are performed at minimum on an annual basis. The completion date of the internal audit is not to surpass the anniversary date of Govan Brown COR™ certification.

Internal audit frequencies may increase based on the occurrence of an accident or incident (hazard based) considering the status and significance of the incident, with the expected outcome of determining preventive actions required to prevent a reoccurrence.

**Internal Auditor Qualifications**

Audits are conducted by an Internal Auditor who is competent based on knowledge, experience and training. Auditors must have successfully completed the following minimum training requirements prior to commencing an internal audit described by this procedure:

- COR™ Essentials
- Basic Auditing Principles
- COR™ Internal Auditor
- Introduction to Hazard and Risk Management

In addition to the above it is suggested that the Internal Auditor have a minimum of one year working with Govan Brown, or equivalent of external knowledge and experience to understand the process and associated hazards.

To prevent bias, internal auditors should be independent of the area or system being audited, yet knowledgeable enough of the area or system being audited to conduct a fair assessment.

**Internal Auditor Performance**

The evaluation of the Internal Auditor's performance is to ensure the effectiveness and consistency of the internal audit process and is not meant to be a performance appraisal of the individual. If deficiencies are identified during the evaluation, Senior Management will address with the Internal Auditor and propose the appropriate corrective action, which may include training, mentoring or coaching.

Senior Management may utilize an external (consultant) or internal party to evaluate the Internal Auditor's performance.

The Internal Auditor's performance will be evaluated through the verification of the following content of internal audits conducted:

- Completeness and validity of evidence provided,
- Approach for conducting interviews, any feedback from interviewees
- Meeting Internal Audit timeliness

### **Conducting the Audit**

There are three phases in the audit process:

- Preparing for the audit
- Performing the audit
- Summarizing the audit

### **Preparing for the Audit**

Senior Management and the Internal Auditor determine a mutually agreed upon timeframe for the internal audit. The timeframe established must include the completion of the Internal Audit Summary and the post-audit meeting. The Internal Auditor should utilize the COR™ Pre-Audit Checklist as guidance for completing the Internal Audit.

### **Performing the Audit**

The COR™ Audit Tool will be utilized by the Internal Auditor for determining if each element of Govan Brown Health and Safety Management System and program conforms to the COR™ program, requirements.

The Internal Auditor will document the findings in the “Auditor’s Notes” section in the COR™ Audit Tool. The findings need to be clear and specific, and readily retraceable to the element audited. This includes listing the following:

- Document reviewed (title, document control number if applicable) and the specific section of the document (i.e. section, subsection, bullet number, paragraph number etc.).
- Record reviewed (title, date of record, person who completed, if applicable).

Note: Internal Auditor is to use the guideline provided in the COR™ Audit Tool and the IHSA’s Instructions for Completing the COR™ Audit for clarification and to ensure the correct record and document are being reviewed.

In addition to COR™ criteria, the Internal Auditor will assess the effectiveness and successful usage of Govan Brown Health and Safety Management System and program. This will be done by reviewing the usage of any prescribed forms or procedures that may not be a COR™ requirement but is a requirement of the Govan Brown.

### **Interviews**

The intention of management, supervisor and worker interviews is to determine the implementation of the active Health and Safety Management System and program as well as workers comprehension. The interview process is still a method for auditing the functionality of the system, this is not an audit of the individual.

General practices for interviewing:

- One on one interviews; group interviews are not permitted.
- Put the interviewee at ease and remind them that this is an audit of the system, and not them as an individual.
- Ask questions as they are written. Do not provide answers.
- Ask the interview all the questions that pertain to their position.
- Be polite and thank the individual for their time.

The Internal Auditor will use the number of interviews will be determined by the Audit Interview Ratio provided in the IHSA’s Instructions for Conducting the COR Audit.

### **Observations**

The number of sites visited will be determined by the Worksite Observations Guidelines in the IHSA’s Instructions for Conducting the COR Audit and will include head office.

### **Scoring the Audit**

The Internal Auditor will score each element according to the verification technique utilized (document, interview and or observation). The technique employed is as prescribed in the COR™ Audit Tool.

A score of zero or partial marks are recorded where the element cannot be verified. If partial marks are assigned, the Auditor must specify why in the notes section. Partial marks can only be assigned to the elements that are shaded in grey.

The minimum **total** score required to pass the COR™ Audit is 80%. For each **individual element** the passing score is 65%. Must obtain 100% on all items identified as legislated requirements

Regulatory requirements are denoted with an asterisk (\*). Regardless of the success of all other aspects of the element, if a regulatory section is nonconforming then the element fails.

**Summarizing the Audit**

Upon completion of the audit the Internal Auditor must complete an Audit Summary Report, that includes a:

- Description of the Company,
- Reference to some of the positive findings,
- Summary by element of the audit outcome listing the strengths and opportunities for improvement
- Overall summary of opportunities for improvement (corrective action plan)

**Corrective Action Plan**

Deficiencies and recommendations identified during the Internal Audit will be communicated and reviewed by Senior Management.

As a result of the audit review, an action plan will be developed based on identified deficiencies/non-conformity to Govan Brown Health and Safety Management System and program.

Action items will be prioritized, clearly identify the required corrective action, assign responsibilities, list target dates and completion date.

An approved, prioritized action plan (completed with assignment of responsibility and anticipated implementation dates) as well as objectives will be elaborated and communicated to all Govan Brown staff.

The approval of the action plan will be captured in the meeting minutes and sign in.

Changes to the Health and Safety Program Manual with latest revision to the documentation will be distributed to relevant workplace parties.

**Submitting Audits**

Senior Management review meetings will discuss Health and Safety Management System and program performance, outcomes and results of Health and Safety Management System and program elements review/audit and progress of health and safety objectives.

Completed annual internal COR™ audits are submitted to the IHSA. Please refer to the IHSA Instructions for Completing the COR™ Audit.

**HAZARD-BASED AUDITS**

Additional hazard audits and hazard risk assessment may be conducted as required as per Govan Brown Hazard Recognition & Control Policy.

Following an accident or an incident a hazard-based audit could be conducted to determine whether additional controls are required to prevent reoccurrence. In this case the Auditor will refer to the hazards assessment protocol outlined in the Element 2 of this manual and audit the current controls for adequacy and effectiveness.

Audits for hazard-based audits can be carried out by Site Supervisors, Joint Health and Safety Committee members, Senior Management and or designate.

**COMMUNICATION**

- Govan Brown Management Review and Continual Improvement Policy, program and procedures located in the Govan Brown health and safety binder and be posted in the workplace H&S safety Boards.
- Govan Brown's Management Review and Continual Improvement Policy, program and procedures will be communicated to all new Govan Brown workers, supervisors, and managers through new employee general orientation or site-specific induction and/ or through periodic management and staff safety meetings or toolbox talk meetings.
- All existing Govan Brown staff will receive orientation through the OHS Program / Occupational Health and Safety Management System (OHSMS) orientation and /or through Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) communication and periodic management and staff safety meetings as well as through periodic and ongoing safety training, internal communication protocols or structured training sessions.

**TRAINING**

- All new managers, supervisors, and workers will receive training Govan Brown Management Review and Continual Improvement Policy, program and procedures during their on-boarding training upon hire.
- All new employees will receive awareness training as part of their orientation on their specific health and safety roles and responsibilities through the new hire orientation process.

- All existing employees will receive training on their health and safety roles and responsibilities through periodic staff OHS Program / Occupational Health and Safety Management System (OHSMS) orientation safety meetings as well as through periodic and ongoing safety training or structured training sessions.

The Internal Auditor will receive training by an accredited training provider on the following COR™ courses:

- COR™ Essentials
- Basic Auditing Principles
- COR™ Internal Auditor
- Introduction to Hazard and Risk Management

The Senior Management Representative is required to receive the COR™ Essentials course at minimum.

## **EVALUATION**

- Management Review and Continual Improvement Policy, program and procedures will be reviewed on annual basis by Senior Management and /or during the annual OHS Program / Occupational Health and Safety Management System (OHSMS) internal audit and maybe changed due to business needs, any legal requirements and based on the results of the evaluation to ensure it continues to meet OHS regulation and standards and to ensure it is relevant with current operations and any changes will be indicated in the meetings minutes or reflected on the revision page.
- The Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) and management will also be involved with the evaluation by analyzing forwarded items of concern and suggesting corrective action.
- On a yearly basis, management will review OHS Program / Occupational Health and Safety Management System (OHSMS) to assess whether it is still compliant with current regulations and with the current work environment. If necessary and if required procedure will be amended to reflect the current operation.
- After the year-end audit a thorough analysis of the gaps identified will be conducted by the Internal Auditor & Senior Management will develop an action plan that addresses the deficiencies with an overall goal of continual improvement.
- Senior Management at least annually or more often as required should review and validate company Document Control Master List with indication supporting documents needed to implement, monitor and maintain active OHS Program / Occupational Health and Safety Management System (OHSMS) effectively and assess conformance with business, corporate and legal requirements as well as compliance with applicable standards.
- Document Controller or Designee will coordinate and manage Document Control Register to ensure changes to, and current versions status of, documents are identified and tracked in order to prevent the unintended use of obsolete documents and identify such documents if they are retained for any purpose

## **REFERENCE**

Occupational Health and Safety Act R.S.O. 1990

OHS Program / Occupational Health and Safety Management System (OHSMS)

Document Control Master List

Document Control Register

### **Additional References**

COR™ Audit Tool

IHSA's Instructions for Completing the COR Audit

COR™ handbook

Health and Safety Statistic and Trend Analysis Report

Corrective Action Plan

Senior Management Meeting minutes

## MANAGEMENT OF CHANGE (MOC) POLICY STATEMENT

Govan Brown Associates Limited senior management recognizes that applying the change analysis concept is essential within a management of change process and will establish and maintain formal, standardized methodology for managing changes to processes and other aspects of the management system in a controlled manner aiming to be transparent in our work, prevent change-related incidents, minimize negative impact on delivery of services to our users and clients and comply with legal requirements.

Govan Brown Associates Limited believes that change is best managed when the organization anticipates its potential impacts, risks and loss exposures created by temporary or permanent change and when workers and worker representatives are consulted to assure that:

- The hazards and risks that may arise are identified and assessed and that appropriate control measures are taken.
- New hazards created are evaluated and controlled to an acceptable risk.
- Previously resolved hazards are not negatively impacted increasing the risk.
- Occupational Health and Safety Management System (OHSMS) is not negatively impacted.
- Organization compliance with legislative requirements

The objective of Govan Brown Associates Limited management of change process is to minimize the introduction of new hazards and risks into the work environment when temporary or permanent changes are made such as in technology, equipment, facilities, work practices and procedures, design specifications, raw materials, organizational staffing changes, and standards or regulations.

Govan Brown Associates Limited will ensure all hazards, impacts, risks and loss exposures associated with new or changed processes, plant & equipment and / or materials with the potential to adversely affect the health and safety of our people and others impacted by our business are identified and the risks eliminated or effectively controlled at the designed stage prior to the introduction of that change.

Govan Brown Associates Limited management will ensure that management of change process follows a Plan-Do-Check-Act model of continual improvement and prior authorizing the implementation of changes following is verified:

- All necessary technical, safety, security, risk assessments and environmental reviews are completed;
- Risks and consequences assessed and adequate controls identified during the review processes and addressed to the utmost satisfaction;
- Proposed changes comply with regulatory and legal requirements;
- Necessary approvals are obtained from the regulatory and/or legal authority wherever required;
- All affected personnel are informed of the changes and adequately trained where necessary;
- Documentation pertaining to changes and reviews is complete.

Govan Brown Associates Limited senior management is committed to ensure continual improvement of the health and safety and implemented health and safety program will be evaluated to assess the suitability, adequacy, and effectiveness of the program. This will be completed annually as minimum, or more often as necessary, to make revisions as required.

All management reviews will be documented and recorded including observations, conclusions, recommendations and action plans for further necessary action from the review.

If any corrective action must be taken, senior management will follow up to ensure that the action was effectively implemented.



Colin Gray

President – Govan Brown Associates Limited

March 22/24

Date



## MANAGEMENT OF CHANGE (MOC) PROGRAM & PROCEDURE

### PURPOSE

Govan Brown senior management is committed to ensure the continual improvement of the active Health and Safety Program and implemented Management of Change Policy and program in order to ensure the continuous improvement process where the occupational Health and Safety Program is monitored and evaluated to assess the suitability, adequacy, and effectiveness of the program.

Govan Brown recognizes that any change to plant, process or people could introduce risk and furthermore, changes can have unintended or unsuspected consequences. A review of incidents across industry indicates that ineffective management of change processes can result in:

- Change management that focuses on the expected benefits without properly considering the possible risks;
- A tendency to focus on technical change rather than all types of change e.g., organizational, materials and legal and regulatory requirements;
- Failure to communicate changes to the people affected by the change;
- Failure to update or revise key documents such as operating procedures; and
- Failure to address all relevant aspects of a change, which is a factor in many incidents and poor business decisions.

Govan Brown management of change program is based on change analysis concept and is about identifying potential hazards that a change can introduce, then assessing the risks associated with these hazards, and systematically addressing them.

Govan Brown recognizes that applying the change analysis concept is essential within the scope of the OHS Program / Occupational Health and Safety Management System (OHSMS) including the management of change process and established a formal process that is used to manage any change from conception and design stage through to implementation to identifying foreseeable potential hazards and managing their risks.

The objective of implemented management of change process is to minimize the introduction of new hazards and risks into the work environment when changes are made such as in technology, equipment, facilities, work practices and procedures, design specifications, raw materials, organizational staffing changes, and standards or regulations.

### SCOPE

This policy and program apply to Govan Brown work arising from temporary and permanent changes to physical structures/buildings, and systems/processes/procedures used to manage OHS risks, equipment, materials or substances or external changes including new or amended legal and other requirements; and new OHS knowledge or technologies. The scope does not include change in personnel except in the case where the organizational structure of the Govan Brown is affected

Within the scope of the current OHS Program / Occupational Health and Safety Management System (OHSMS) this policy and program interrelated and interacting with following elements:

- |  |  |
|--|--|
| • Hazard Assessment, Analysis and Control          | • Training and Communication   |
| • Controls   | • Emergency Preparedness and First Aid   |
| • Procurement and Contractor Management            | • Statistics & Records   |
| • Company Rules                                    | • Legislation and Other Requirements   |
| • PPE  | • Occupational Health  |
| • Preventative Maintenance & Workplace Inspections | • Health & Safety Representative (HSR) / Joint Health & Safety Committee (JHSC) / Joint Occupational Health and Safety Committee (JOHSC) |
| • Investigation & Reporting                        | • Management Review  |

## **ROLES AND RESPONSIBILITIES**

### **MANAGEMENT**

- Define the purpose of the MOC system and establish organizational responsibilities and accountability levels.
- Establish a process for change requests and assign responsibility for acceptance or rejection or modification of the change request, in accordance with the results of the change analysis.
- Outline a method to determine actions needed as a result of the MOC process.
- Design the strategic approach to MOC and lead MOC activities within a structured process framework supporting operations that fall within the MOC domain.
- Ensure employees understand and follow the MOC requirements outlined in the policy and procedural framework.
- Ensure ownership, stewardship, and effectiveness of the MOC process is in place and assign MOC review and approval authority as appropriate for employees within their area(s).
- Evaluate the change impact and organizational readiness to limit potential risk providing adequate controls and actionable guidelines on reducing the impact.
- Provide training and communication as part of MOC including designing or delivering specialized training resources to appropriate.
- Evaluate resistance and manage the MOC process allowing the organization to prepare for and successfully adopt the change at the user, process, and technology level.
- Conduct post-implementation reviews to assess the decisions and performance related to the change request.
- Ensure all supervisors, managers, and workers are adequately trained on the MOC protocol including procedural framework for Hazard Assessment, Analysis and Control Policy.
- Ensure that appropriate resources and personnel are assigned for implementing and maintaining the functionality of the MOC process when addressing at a minimum change in legal requirements; significant changes in work processes, control measures, equipment, organization, work location; introduction of new products, processes or services or introduction of new developments in OHS knowledge or technology.
- Ensure work is completed according to the approved MOC including attached documentation and reviewers conditions of approval.
- Ensure change analysis concept applied during the MOC process when evaluating design of machines, equipment, and facilities and risk are best addressed, eliminated and controlled at the design stage.
- Ensure that hazard and risk identifications and assessments carried out by competent personnel and involve participation by workers and workers representatives before any modification or introduction of work methods, materials, processes, machinery, or equipment in the workplace.
- Ensure hazard and risk assessment conducted and controls identified and communicated when there is significant changes to work procedures, equipment, organizational structures, staffing, products, services, suppliers, or in case of external changes including new or amended legal and other requirements; and new OHS knowledge or technologies.
- Authorize major change requests and coordinate MOC process with relevant work parties for changes presenting higher risk.
- Implement corrective actions using the action plan to address any deficiencies or shortfalls identified during the review and or audit of Health and Safety Management System and program elements, health and safety KPI's and health and safety objectives progress.
- Identify overall action plan for all Health and Safety Management System and program elements and or audit, which will be reviewed at a senior management meeting and approval will be reflected in the minutes and meeting sign-off.
- Retain records of any senior management review meetings, internal /external audits, action/corrective actions plan and communication records.
- Ensure adequate communication between affected work parties about the changes and provision of information sessions and training for affected workers and worker representatives.

**SUPERVISOR**

- Implement and maintain functional MOC program and protocols with completion change management assessments.
- Identify, analyze and prepare risk mitigation tactics, and manage anticipated resistance.
- Coordinate efforts with other specialists and integrate change management activities into project plan.
- Evaluate and ensure user readiness, define and measure success metrics and monitor change progress with support change management at the organizational level.
- Ensure appropriate resources are allocated to achieve and maintain compliance to MOC for critical risk processes.
- Utilize appropriate resources and personnel while implementing and maintaining the functionality of the MOC process when addressing at a minimum change in legal requirements; significant changes in work processes, control measures, equipment, organization, work location; introduction of new products, processes or services or introduction of new developments in OHS knowledge or technology.
- Lead the hazard assessment process by ensuring that hazard assessments are completed, documented, and reviewed for all operations and activities when evaluating design of machines, equipment, and facilities and risk are best addressed, eliminated and controlled at the design stage.
- Ensure work is completed according to the approved MOC including attached documentation and reviewers conditions of approval.
- Ensures MOC procedure is followed when undertaking change associated with existing critical risk or its controls, or if introducing potential critical risk into the business.
- Communicate hazards and controls identified on the hazard assessments (i.e., through safety meetings, site safety plan, orientation, training sessions, site specific hazard assessments) and ensure workers understand, review, and sign off on the hazard assessments and ensure that controls are developed and implemented for identified hazards in a timely manner.
- Support and review the process of ongoing hazard assessments and ensure that all workers/subcontractors are trained with regard to the procedural framework as part of Govan Brown MOC process and Hazard Assessment, Analysis and Control Policy and program.
- Provide appropriate coaching, mentoring and training as requested by management within the scope of MOC domain.
- Develop, collect and report KPIs for the MOC process, and perform process compliance audits to identify deficiencies and opportunities for improvement.
- Authorize minor change requests and coordinate with work parties the management for changes presenting higher risk.
- Lead post-implementation reviews to assess the decisions and performance related to the change request.
- Assist management to implement the action plan to mitigate identified hazard risk factors and follow up on implementation.
- Review and educate all workers with regards to the hazards of the workplace and job duties and to confirm their understanding and awareness.
- Review all hazard reports forwarded by any/all Govan Brown employees with the Site Manager and immediately implement corrective action or develop an action plan to implement corrective actions to eliminate or reduce the identified hazard(s).

**HEALTH & SAFETY REPRESENTATIVE / JOINT HEALTH & SAFETY COMMITTEE MEMBER**

- Work with supervisors and management to identify and control hazards in the workplace within functional MOC program with completion MOC assessments through the hazard assessment process.
- Participate in the development of hazard assessments and safe work practices and safe job procedures related to MOC process.
- Immediately implement any possible controls to mitigate against risk based on risk rating level and assist management to implement the action plan to mitigate identified hazard risk factors.
- Forward any hazard reports to management related to hazard and risks associated with changes in legal requirements; significant changes in work processes, control measures, equipment, organization, work location; introduction of new products, processes or services or introduction of new developments in OHS knowledge or technology.
- Understand, review, and sign off on hazard assessments developed in consultation with management or supervisor within MOC domain.
- Follow hazard control measures identified with MOC process with changes in legal requirements; significant changes in work processes, control measures, equipment, organization, work location; introduction of new products, processes or services or introduction of new developments in OHS knowledge or technology.

**WORKERS**

- Actively participate in the MOC process lifecycle, including all of its phases and stages as required including hazard assessments developed in consultation with management or supervisor within MOC process and monitor efficiency and effectiveness of change.
- Cooperate in the workplace hazard risk assessment process and follow hazard control measures identified with MOC process with changes in legal requirements; significant changes in work processes, control measures, equipment, organization, work location; introduction of new products, processes or services or introduction of new developments in OHS knowledge or technology.
- Review each hazard risk assessment provided to them by management / supervisors and to ensure to follow the identified safe work procedures to mitigate against identified hazards of the workplace and job duties.
- Share concerns and report abnormalities or observed unsafe conditions and contribute to ensure all relative health & safety consideration are given to the changes being made and maintain functional MOC program with completion MOC assessments.
- Support and participate in communication, information sessions and training provided within the MOC process and related to implemented changes in legal requirements; significant changes in work processes, control measures, equipment, organization, work location; introduction of new products, processes or services or introduction of new developments in OHS knowledge or technology.
- Carry out work in a manner so as not to create a health and safety hazard to themselves or others.
- Do not remove, displace or interfere with the use of any safeguards.
- Report defects in workplace equipment to manager / supervisor immediately and take all necessary steps to prevent accidents from occurring while the defects are being reviewed or repaired.
- Comply and follow identified safe work procedures and regulatory requirements.
- Co-operate with Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) where appropriate.

**CONTRACTOR / SUBCONTRACTOR**

- Contractors working on behalf of Govan Brown shall have a Management of Change process within their own organization that is consistent with this program and Govan Brown shall confirm and verify contractors' Management of Change process prior to awarding work.

## MOC EXECUTION ACCOUNTABILITIES

### MOC Initiator

- Initiate the change request.
- Identify the purpose and expected benefits from the change.
- Provide justification for the change.

### MOC Approver

- Assess the documented change request to ensure validity of the justification, risk assessment, impacts, and feasibility.
- Decide if the change will proceed to planning while considering alignment with company goals, risks, and impacts.
- Assign the MOC Leader.
- Review the completed information from the planning step.
- Decide if the changing will proceed to the implementation.
- In complex operations where a change involves multiple disciplines, the MOC approver(s) accountability may be delegated to the cross functional team committee or equivalent.
- Before authorizing the implementation of changes, ensure that following points are verified:
  - All necessary technical, safety, security, and environmental reviews are completed;
  - Risks and consequences identified during the review processes are addressed to the utmost satisfaction;
  - Proposed changes comply with regulatory and legal requirements;
  - Necessary approvals are obtained from the regulatory and/or legal authority wherever required;
  - All affected personnel are informed of the changes and adequately trained where necessary;
  - Documentation pertaining to changes and reviews is complete.

### MOC Leader

- Coordinate, track, and manage all aspects of the MOC process.
- Ensure required reviews and approvals are in place prior to implementation of change.
- Review the proposed changes in detail using available documentation such as plans, change schedules, drawings etc.
- Identify assess potential hazards and risks associated with the change to ensure new hazards created are controlled to an acceptable risk and previously resolved hazards are not negatively impacted - increasing the risk.
- Evaluate the merits of the proposed change and determine the actions necessary to address and implement the intended changes with consultation with subject matter experts including but not limited engineers, contractors, consultants, or other relevant parties before according approval for the proposed change.
- Agree and document interim controls and action plans associated with the change including the length of time temporary changes or permanent changes with critical risk controls in place.
- Develop processes for monitoring adherence to the action plans for temporary or permanent changes.
- Ensure the change is documented and change records retain including but not limited process safety information, drawings, plans and any other documentation required for the change.
- Ensure changes are implemented and carried out in accordance with the applicable statutory requirements.

### MOC Team Member

- Assist the MOC Leader in the planning and implementation of the change.
- Ensure assigned tasks are carried out.

## PROCEDURE

Govan Brown Management of Change (MOC) process based on following steps:

### 1. Change request

MOC initiator:

- Determine the scope of the proposed change including a justification for the change, (risk reduction or opportunity), and impacts of the change.
- Validate type of change and if the change requires application of MOC.
- Perform initial risk assessment using the Govan Brown Risk Matrix for changes intended to reduce risk to determine risk rank using the Govan Brown Risk Matrix and applying Hazard assessment, analysis and control requirements as per company procedural framework (EL 2 and EL 3).
- Initiate the documented change request with identification at minimum:
  - o Name of person making the request;
  - o Date of request;
  - o Department, section, or area;
  - o The equipment, facility, or process affected;
  - o Brief description of the proposed change and what it will accomplish;
  - o Potential performance, safety, health, and environmental considerations;
  - o Effect the change may have on standard operating procedures, maintenance, and training, etc.;

### 2. Approval to Plan

MOC Approver:

- Assess the change request to ensure validity of the justification, risk assessment, impacts, and feasibility.
- Decide on approval of the change request, taking into consideration alignment with organization goals, risks, and impacts, and document the decision.
- Assign the competent MOC Leader and allocate appropriate resources and personnel for implementing and maintaining the functionality of the MOC process.

### 3. Planning

MOC Leader:

- Refine and validate the scope and justification of the change.
- Assess the impact of the change.
- Conduct hazard and risk assessment and develop risk treatment plan for implementation of the change when there is significant change to work procedures, equipment, organizational structures, staffing, products, services, suppliers, or in case of external changes including new or amended legal and other requirements; and new OHS knowledge or technologies.
- Ensure that hazard and risk identifications and assessments carried out before any modification or introduction of work methods, materials, processes, machinery, or equipment in the workplace applying Hazard assessment, analysis and control requirements as per company procedural framework (EL 2 and EL 3)
- Develop implementation plan and ensure that hazards and risk are best addressed, eliminated and controlled at the design stage.
- Identify and assign the MOC Team members.
- Ensure key stakeholders are identified and engagement planned through communications.
- Outline effectiveness review requirements and plan.
- Determine resourcing, cost, and schedule.
- Consultation with subject matter experts including but not limited engineers, contractors, consultants, or other relevant parties before approval for the proposed change
- Develop processes for monitoring adherence to the action plans and temporary changes.

#### 4. Approval to Implement

MOC Approver:

- Review and validate the work completed in planning the change including the implementation plan and risk treatment plan.
- Assess the change for potential impacts on:
  - o Not implementing the change
  - o Corporate and legal requirements and commitments
  - o Asset integrity
  - o Other ongoing projects, changes and initiatives
  - o Relevant stakeholders
  - o Approve, reject, or postpone the MOC implementation.

#### 5. Implementation

MOC Leader & MOC Team Member(s):

- Implement change in accordance with implementation plan. If changes are made to the implementation plan, approvals are required to be obtained for the deviation.
- Identify, track, and complete assigned tasks until the change is fully implemented and ready for commissioning, and documents are properly updated.

#### 6. Commissioning

MOC Leader & MOC Team Member(s):

- Validate completion of implementation steps for successful utilization, turnover, and commencement of the change.
- Conduct a pre-start-up safety review (PSSR) with stakeholders.
- Identify outstanding tasks with responsibilities and timing and decide if commencement of the change can proceed prior to their completion.
- Put the change into effect as “start-up” the change.

#### 7. Post – Commissioning Review

MOC Leader & MOC Team Member(s):

- Verify the change was effective in achieving the desired outcome and complete Effectiveness Review.
- Manage and track outstanding tasks.
- Close-out the MOC.

### DETERMINING CHANGE STATUS

The following criteria outlined by Govan Brown Management of Change (MOC) process to determine the change status as temporary, permanent and emergency.

**Permanent Change** – any change which is to remain in effect for an extended and undefined period of time.

**Temporary Change** - any change which is temporary in nature and is reviewed on the basis that the change will not be permanent and implemented for a time period that is known, short, predetermined, finite. Temporary would typically be intended to last for a period of time not to exceed twelve (12) months.

A Temporary Change is an interim solution only and shall require review and re-approval at a minimum every 12 months. Within 12 months of implementation of a Temporary Change, one of the following shall occur:

- Remove the Temporary Change and return to original condition
- Extend the Temporary Change pending evaluation and approval
- Remove the Temporary Status and ensure proper completion of MOC to implement the permanent change or return operations to normal.

Temporary Change arrangements follow the same rigour for adherence to the MOC process with additional attention required due to the significant risks the change may introduce.

Close-out shall detail the steps taken to remove the Temporary Change and return operations to normal.

**Emergency Change** - any change which is required immediately to avoid personnel injury, environmental incident, equipment damage, reputational impact, security incident, economic loss.

Emergency change status shall only be used in situations where the time required to implement through the normal change process would not be acceptable.

An Emergency Change does not remove the requirement to:

- Conduct a Risk Assessment of the change
- Obtain approval for the change

Senior Management or designate shall approve when a change may be designated as an Emergency.

On the next work day after the emergency situation has passed the change shall be processed via the MOC process.

### **DOCUMENTATION REQUIREMENTS**

All changes required to follow the MOC Process shall be formally documented and retained as a change record.

Documentation associated with a change shall be included as part of the change record.

Changes shall be documented in a way that allows Govan Brown to:

- Maintain a record of the change
- Learn from the change
- Monitor the progress of the change
- Help manage impacts of the change
- Drive continuous improvement
- Aid in determining the root cause of incidents

The change record and associated documentation shall be updated / maintained as the change progresses through the process.

Documentation associated with the change shall be approved and evidence of approval retained with the change record.

### **IMPLEMENTATION OF CHANGES**

Changes must be implemented as documented and agreed with controls and written procedures to manage changes.

These written procedures must ensure that the following considerations are addressed from a health and safety perspective prior to any change:

- Ensure there is knowledge and understanding of the purpose of the proposed change;
- Impacted stakeholders;
- Impacted processes and controls;
- Modifications to operating procedures;
- Necessary time period for the change; and
- Authorization requirements for the proposed change.

All workers who operate a process, or part of a process that will be affected by change, or whose job tasks will be affected by change, must be informed of, and trained in, the change prior to start-up. If a change is covered by a standard operating procedure or practice, the required safety information must be updated accordingly.

Once the change has been introduced, performance should be tracked to ensure there are no adverse impacts as measured by the identified key results indicators or other measures. Unfavourable impacts may require further analysis and development of additional action items. Action items identified for completion after the date of the change must be tracked to completion as well.

The approved action plan should be communicated to the personnel involved. The potential benefits of such communication include easier and faster implementation of the actions, familiarity with and feedback on the planned monitoring process and improved understanding and support of the change itself. Such communication may result in the identification of other issues or actions not previously identified.



Once all recommendations are complete and sufficient time has elapsed to evaluate the effects of the change, change leaders should conduct a final review to verify that all actions are complete and that key results indicators do not indicate any unfavourable results. That being the case, the change is considered complete and signed off by management.

Upon implementation of change, Govan Brown management will verify the following:

- Implemented changes are as intended;
- Documentations are complete pertaining to changes;
- Changes are communicated
- Applicable regulatory and legal requirements are fulfilled;
- Project Plan and Budget are amended

## **COMMUNICATION**

- Govan Brown Management of Change (MOC) Policy, program and procedures located in the Govan Brown health and safety binder and be posted in the workplace H&S safety Boards.
- Govan Brown's Management of Change (MOC) Policy, program and procedures will be communicated to all new Govan Brown workers, supervisors, and managers through new employee general orientation or site-specific induction and/ or through periodic management and staff safety meetings or toolbox talk meetings.
- All existing Govan Brown staff will receive orientation through the OHS Program / Occupational Health and Safety Management System (OHSMS) orientation and /or through Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) communication and periodic management and staff safety meetings as well as through periodic and ongoing safety training, internal communication protocols or structured training sessions.

## **TRAINING**

- All new managers, supervisors, and workers will receive training Govan Brown Management of Change (MOC) Policy, program and procedures during their on-boarding training upon hire.
- All new employees will receive awareness training as part of their orientation on their specific health and safety roles and responsibilities through the new hire orientation process.
- All existing employees will receive training on their health and safety roles and responsibilities through periodic staff OHS Program / Occupational Health and Safety Management System (OHSMS) orientation safety meetings as well as through periodic and ongoing safety training or structured training sessions.

## **EVALUATION**

- Management of Change (MOC) Policy, program and procedures will be reviewed on annual basis by Senior Management and /or during the annual OHS Program / Occupational Health and Safety Management System (OHSMS) internal audit and maybe changed due to business needs, any legal requirements and based on the results of the evaluation to ensure it continues to meet OHS regulation and standards and to ensure it is relevant with current operations and any changes will be indicated in the meetings minutes or reflected on the revision page.
- The Health and Safety Representative (HSR) / Joint Health and Safety Committee (JHSC) /Joint Occupational Health and Safety Committee (JOHSC) and management will also be involved with the evaluation by analyzing forwarded items of concern and suggesting corrective action.
- On a yearly basis, management will review OHS Program / Occupational Health and Safety Management System (OHSMS) to assess whether it is still compliant with current regulations and with the current work environment. If necessary and if required procedure will be amended to reflect the current operation.
- After the year-end audit a thorough analysis of the gaps identified will be conducted by the Internal Auditor & Senior Management will develop an action plan that addresses the deficiencies with an overall goal of continual improvement.
- Senior Management at least annually or more often as required should review and validate company Document Control Master List with indication supporting documents needed to implement, monitor and maintain active OHS Program / Occupational Health and Safety Management System (OHSMS) effectively and assess conformance with business, corporate and legal requirements as well as compliance with applicable standards.
- Document Controller or Designee will coordinate and manage Document Control Register to ensure changes to, and current versions status of, documents are identified and tracked in order to prevent the unintended use of obsolete documents and identify such documents if they are retained for any purpose

**REFERENCE**

Occupational Health and Safety Act R.S.O. 1990

OHS Program / Occupational Health and Safety Management System (OHSMS)

Document Control Master List

Document Control Register

Change Request Form

## STO/GB ENVIRONMENTAL POLICY AND PROCEDURE

### ENVIRONMENTAL POLICY STATEMENT

#### 1. Policy Statement

**Govan Brown & Associates Limited staff are not trained or certified to perform hazardous Materials abatement. Govan Brown & Associates Limited is not and does not want to be in the business of performing contaminated or hazardous remediation work. It is critical that Govan Brown & Associates Limited Business Units take all steps possible to insulate Govan Brown & Associates Limited from the risks of abating existing hazardous materials.**

It is the Owner's responsibility to provide the contractor with a comprehensive environmental report from a licensed environmental consultant to indicate whether hazardous materials are present or anticipated. Normally it is the owner's responsibility to arrange for the remediation of any contaminated or hazardous materials, whether found before the project is bid and awarded, or if discovered during construction. Govan Brown & Associates Limited requires that the Owner provide assurances via a Clean Letter from a certified/licensed Remediation Contractor that a project site is either free from environmental hazards before work begins or that the environmental hazard identified during an ongoing project has been successfully remediated or rendered harmless.

If Govan Brown & Associates Limited anticipates they may become contractually obligated to perform contaminated or hazardous remediation, or that the Owner will sign an Agreement of Convenience as described herein, the procedures described below will be followed.

**At no time will Govan Brown & Associates Limited "self-perform" any remediation.**

Details involving our response to hazardous materials under different scenarios are provided below.

### ENVIRONMENTAL PROCEDURES

#### **A. Identifying and responding to an existing Environmental Risk Before Govan Brown & Associates Limited proposes on or bids a job and begins work:**

Identification of the Environmental Risk in the Govan Brown & Associates Limited Salesforce "Go- No Go" risk register.

*If an Environmental Risk or required abatement is identified during the pre-bid process, it must be identified by checking off (X) the category marked "Environmental Risk". They must review the Environmental Policy to comment whether they are able to comply with the guidance specific to this environmental risk.*

#### **B. Pre-Proposal Planning:** Prior to proposing on or bidding work, the Business Unit must determine if any hazardous material exists within the proposed project site or limits or qualify that our Work excludes any abatement or remediation work.

**A Phase I Environmental Assessments** primarily assesses the likelihood that a site is contaminated through visual observations, historical use reviews and regulatory records.

*New construction after 1978 has no lead-based paint or asbestos per the 1976 Toxic Substances Control Act (TSCA). \* Some roofing products may have an asbestos exemption.*

The Canadian Environmental Protection Act, 1999 (CEPA) provides the Government of Canada instruments including regulations to protect the environment and human health and establishes strict timelines for managing substances found toxic under the act. Substances that are determined to be "toxic" under CEPA are recommended for addition to the List of Toxic Substances (Schedule 1) of the act.

Based upon the results of the Phase I Environmental Assessment:

**A Phase II Environmental Assessment** may be recommended to further investigate the environmental risk of the property. A **Phase II Environmental Assessment** includes physical testing to identify the hazard(s) and may include (but is not limited to) lead, mold, asbestos, mercury, PCBs, arsenic, radon, underground storage tanks, soil, air, groundwater, and chemicals stored on the property. Physical testing and may require more invasive accessibility to hidden conditions.

If Govan Brown & Associates Limited is not contractually obligated to deal with hazardous material, the Owner is responsible for providing Govan Brown & Associates Limited with an Environmental Assessment (Phase I)/Pre-demolition Survey. If this is not available, the Business Unit should hire an environmental consultant and perform the Phase I before submitting a price or proposal and we would qualify our proposal accordingly. Should it be suspected that an environmental hazard exists on a project site or limits as a result of the Phase I being performed, the Owner must perform a Phase II inspection that is to be completed by a qualified (certified or licensed according to provincial regulations) Environmental consultant. This will include any existing mold discovered during pre-project walks. We must ensure that Govan Brown & Associates Limited walks the job site before we put in a proposal.

**High Risk Projects** that should receive an Elevated Environmental review (Corp. Safety, RM, Legal):

- School buildings
- Government buildings
- Healthcare Facilities
- Manufacturing and Industrial Facilities
- Airports
- Developers with whom we do not have a long-term working relationship
- Conversions of any building type to residential – rentals or condos

**C. Prior to Project Mobilization:**

- a. All hazardous materials will be abated under a separate contract held by the Owner. This must occur prior to Govan Brown & Associates Limited Construction mobilizing on site. Upon completion by the Owner's consultant(s) and/or subcontractors, Govan Brown & Associates Limited will be issued a **Clean Letter** documenting and verifying the successful remediation and subsequent clearance to proceed with construction.

**Note:** The clean letter **must** be obtained prior to mobilization.

If there are existing hazardous environmental conditions and it is not our contractual obligation to perform the remediation work (our preferred position), but the Owner wants Govan Brown & Associates Limited to contract with a Remediation Contractor to do the work on a project which is not High Risk (see list above):

The Owner **must** agree to sign the Govan Brown & Associates Limited **Agreement of Convenience** indemnifying Govan Brown & Associates Limited for liability.

**D. Contractually Obligated:**

- a. During the negotiation of the General Contract, if the Business Unit GM feels he must become contractually obligated to remediate contaminated or hazardous material, the Business Unit must obtain sign-off of the Govan Brown & Associates Limited Corporate Safety, Risk Management and Legal.
- b. Insert the 'Agreement of Convenience' Language. *Not possible? Contact Risk Management if other risk transfer means need to be considered. (Insurance limits, etc.)*
- c. Exclude any **Liquidated Damages** "arising out of" remediation or abatement delays.
- d. Subcontract with a qualified (certified or licensed per state/local regs) Environmental Contractor for the remediation.

When a remediation contractor performs the remediation, the Project Superintendent is responsible for ensuring that remediation is complete and that Govan Brown & Associates Limited has received a **Clean Letter** prior to any workers entering the space. At no time shall Govan Brown & Associates Limited personnel or subcontractors enter a space that has not been formally approved as safe to enter.

**E. Identifying and Responding to Existing Environmental Exposures After Govan Brown & Associates Limited begins work:**

If an environmental exposure is identified on the project site after Govan Brown & Associates Limited begins work, the project must make sure that the following happens to fully protect Govan Brown & Associates Limited's interests and all workers and staff.

- 1. Immediately Stop Work in Area / Control the Situation:** The Project Superintendent is responsible to stop all work directly associated with the area in question. The area should be controlled in such a manner to eliminate the potential for both worker and public exposure.
- 2. Post Warnings:** The Project Superintendent shall post signage, barricades, and other protective measures to ensure the area remains undisturbed. Work with the Business Unit Safety Director to assure all signage meets OSHA regulations.

**Inform Staff:** Govan Brown & Associates Limited shall inform everyone working on the project.

- 3. Review Owner Contract and Inform Owner of Conditions:** Govan Brown & Associates Limited shall first review the applicable terms and conditions of our contract with the Owner and then promptly inform the owner in writing of conditions identified. If the owner is contractually obligated to perform all remediation work, the owner will hire the remediation company, perform the remediation work, and issue Govan Brown & Associates Limited a "clean letter" prior to anyone returning to work. **The clean letter must be posted.**

***If Govan Brown & Associates Limited is contractually obligated to perform remediation and the Owner signs an Agreement of Convenience, proceed with steps four through six.***

4. **Notify Safety and Claims:** The Project Superintendent shall immediately notify the BU Safety Director and the BU Claims Coordinator.
  - a. **Remediation Work < \$1,000,000:** BU Safety Director, Risk Management, Operations Manager & Purchasing Manager will approve.
  - b. **Remediation Work > \$1,000,000:** The above individuals as well as CORP Safety, BU Leader and CEO.

5. **Purchasing Policy-Hiring of Consultants and Remediation Subcontractors**

Remediation contractors must be certified and/or licensed through their respective state agencies for the work to be performed. Special attention should be placed on any transportation issues and DOT regulations to assure hazardous material is disposed of properly in lined landfills that are authorized to accept the hazardous waste.

Each B.U. should develop a list of “pre-qualified” Environmental Consultants (to be used for Phase I and Phase II Assessments, Environmental Engineering work, Testing and Monitoring) and Remediation Subcontractors (to be used to remove, transport and dispose of mold, contaminated or hazardous materials)

6. **Remediation:** The remediation contractor will provide a written remediation plan to Govan Brown & Associates Limited to eliminate the environmental risk and fully satisfy Govan Brown & Associates Limited, state, federal, and OSHA requirements for performing the work. This plan will be reviewed by project staff and the BU Safety Director.

Govan Brown & Associates Limited superintendent must collect and maintain copies of all manifests signed by the Remediation Contractor, the Transporter and the Disposal Site. **NEVER have Govan Brown & Associates Limited’s name on the manifest and NEVER sign the manifest. [Generator of the waste or their representative must sign]**

**Owner’s representative must sign manifests as the “generator”.**

These conditions apply to any project where Govan Brown & Associates Limited, through its subcontractors, is responsible to handle, store, remediate or abate any contaminated or hazardous material including, but not limited to asbestos, lead, mold, PCB’s, underground storage tanks and/or contaminated soils

**ENVIRONMENTAL INSURANCE REQUIREMENTS**

**Environmental Consultants** must have “Environmental Consultants Professional Liability” insurance with a minimum of \$5M per claim \$5m aggregate, on a “claims made” form. Such coverage shall apply continuously throughout the Term and, without lapse, for a period of five (5) years beyond the termination and acceptance of all Services provided under the Agreement. The retroactive date or “prior acts inclusion date” section 9 of any such “claims made” policy must be no later than the date that activities commenced. Govan Brown & Associates Limited, Owner, et al **not to be** named as Additional Insureds;

**Remediation Subcontractors** must have Contractor’s Pollution Liability Insurance with a minimum of \$5M/per occurrence and \$10M aggregate to include coverage for Contingent Transportation and Contingent Non-Owned Disposal Site. Any deductibles or self-insured retentions over \$50,000 must be disclosed and approved by Govan Brown & Associates Limited. Govan Brown & Associates Limited, Owner, et al **must be** added as Additional Insureds. Risk Management must review policies and endorsements.

**Large Remediation Projects** include any project where the abatement or remediation portion of the work exceeds **25%** of the overall construction volume or the abatement /remediation contract exceeds **\$1,000,000** may require increased pollution liability limits of **\$10,000,000** or more. If any of these conditions exist, consult with Risk Management to review coverage and determine if a project specific placement of insurance will be necessary.

The above requirements are in addition to our General Liability, Excess Liability, Workers Compensation and Auto Liability requirements.

**Remediation subcontractors should be excluded from CCIP’s (Contractor Controlled Insurance Program).** Govan Brown & Associates Limited will never subcontract separately with a “Transporter” or the “Disposal Facility”; this must be part of the Scope of the Remediation Subcontractor.

**ENVIRONMENTAL ROLES AND RESPONSIBILITIES**

**BU Leader or Business Development Lead:**

- Attempt to negotiate the General Contract to specifically exclude Govan Brown & Associates Limited from any obligation to perform remediation of any existing contaminated or hazardous materials.
- Require that the owner sign the “Agreement of Convenience” change order if owner insists that Govan Brown & Associates Limited remediate existing contaminated or hazardous materials.

**Operations Manager:**

- Ensures adherence to all corporate policies.
- Does not allow Govan Brown & Associates Limited to contract remediation work without securing the proper approvals and with adherence to this Environmental Policy.

**Account Executive/Project Manager:**

- Assist in developing Job Hazard Analysis and pre-task plans to ensure hazardous materials are abated properly.
- Obtain Phase I inspection and report findings to OM. This is accomplished before contract is executed or GMP established.
- Obtain Phase II report if Phase I identifies any hazardous materials.
- If it is contractually possible, get the Owner to accept responsibility for existing conditions and to carry remediation as a separate contract and obtain the “clean letter” from the Owner or his environmental consultant and review for completeness.
- If we are contractually obligated or if Owner signs Agreement of Convenience
- Ensure that Project Staff understand and comply with all corporate policies relating to Hazardous and Contaminated Material Remediation.

**BU Purchasing Manager:**

- Provide technical expertise to the project team regarding the contractual obligations associated with Hazardous Material Remediation.
- Ensure all consultants and subcontractors hired by Govan Brown & Associates Limited to engage in this work are qualified and able to perform this type of work.

**BU Safety Director:**

- Provide technical expertise to the project team regarding all aspects of hazardous materials.
- Assist in the review of any subcontractor (Govan Brown & Associates Limited executed contract) remediation plan.
- Review “clean letter” for completeness and advise project staff on how to proceed.

**Project Superintendent:**

- When the Remediation Contractor performs the remediation, the Project Superintendent is responsible for ensuring that all remediation is complete and Govan Brown & Associates Limited has received a **Clean Letter** prior to any workers entering the space. At no time shall Govan Brown & Associates Limited Personnel or subcontractors enter a space that has not been formally approved as safe to enter.
- The clean letter must be communicated to every subcontractor and worker and then posted conspicuously. Ensure all consultants and subcontractors hired by Govan Brown & Associates Limited to engage in this work are qualified and able to perform this type of work.

**Project CMiC Record Retention**

- Copies of all environmental documents should be maintained in the project document CMiC folders under **OPS – Environmental**.

**SAMPLE - ENVIRONMENTAL CLEAN LETTER**

**(Testing Company Name)**

**CLEAN LETTER**

This clearance approval pertains to the following Address and specifically the containment area defined below:

**Description of Environmental Concern: (Type, nature of problem, location):**

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**Project Name/Number:**

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**Address:**

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**[Govan Brown & Associates Limited] Project Representative:**

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**Description of Containment Area:**

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Based on the abatement observations made by (Testing Company Name) personnel while on-site and the final sampling results performed on \_\_\_\_\_, abatement work the above-listed containment area is complete and the area is cleared for normal construction activities.

**Prepared by:**

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NAME OF TESTING COMPANY INVESTIGATOR

**Date:**

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DD/MM/YYYY

**ENVIRONMENTAL AGREEMENT OF CONVENIENCE**

*“The Owner will hire an independent consultant to determine the means, methods, techniques, safety precautions and certify upon completion that the Work was performed properly. Whereas the Contractor does not normally perform this type of Work, but at the Owner’s request and as a contractual convenience for the Owner will enter into an agreement with an abatement subcontractor, any recovery of losses and damages by the Owner is limited to that actually recovered from the abatement Subcontractor, and Owner hereby expressly waives, releases and indemnifies Contractor from any and all liability, losses, costs, expenses and damages with the limited exception of that actually recovered from the abatement Subcontractor. The Contractor hereby assigns whatever rights Contractor may have to assert against the abatement Subcontractor for damages suffered by Owner. The Owner hereby accepts the aforesaid assignment.”*

Where does the ‘Agreement of Convenience’ language reside?

1. **In the General Conditions contract AIA A201-2017 section 10.3** (Hazardous Materials) – if request is made before the contract is executed. (not typical)
2. **Assumptions and Qualifications (or Clarifications)** – if the contract wording cannot be modified. As & Qs take precedence.
3. **Change Order to the Contract** – Notice or event occurs after the contract is fully executed. The change order must be executed before work can start.



## CODE OF CONDUCT

STO Building Group's Code of Conduct and Business Ethics (the "Code"), available [here](#), is the keystone to our commitment to ethical conduct. It provides guidance on upholding STO Building Group's core values and helps employees and business partners understand the legal and ethical principles that govern the way we conduct business.

The Code applies to all STO Building Group employees, and to members of the board of directors, agents, consultants, contracted labor, and others when they are acting for or on behalf of STOBG. This Code also applies to the company's vendors, subcontractors, suppliers, and other business partners.

The Code is an indispensable resource, but it cannot address every situation that may arise. We rely on you to exercise common sense and good judgment in applying the principles contained in the Code, and to ask for help when you need it. These key principles include:

- maintaining compliance with the letter and spirit of all applicable laws and regulations
- upholding our commitment to maintaining a respectful workplace, free from discrimination and harassment, and to fair employment practices providing business opportunities to minority, women-owned, and disadvantaged business enterprises (M/W/DBEs)
- avoiding conflicts of interest—actual, potential, and perceived
- promoting fair competition and making business decisions exclusively on the basis of price, service, and the ability to meet the company's and clients' needs
- operating in a fair and transparent fashion and disclosing material terms and conditions of our engagements
- keeping accurate company documents and records

As a member of the STOBG family, you also have a duty to let the company know about any potential misconduct. Managers have a duty to act and to ensure that reports of potential misconduct made to them are promptly escalated and handled in accordance with the Code. You can report potential misconduct to or seek guidance from any of the following company resources:

- Your manager, a more senior manager, or your business unit leader
- A member of STOBG executive management
- Your compliance liaison or the Compliance & Ethics Department, which can be reached by email at: [compliance@stobuildinggroup.com](mailto:compliance@stobuildinggroup.com)
- The Human Resources Department
- The Legal Department

You may also report potential misconduct anonymously through our 24/7 helpline, operated by a third party unaffiliated with STOBG, by calling the below toll-free numbers or visiting the online portal.

Call toll-free:

800.461.9330 in the United States

1.800.235.6302 in Canada

0808.189.1053 in the United Kingdom

1800.904.177 in Ireland

Online: [compliancehelpcenter.com](http://compliancehelpcenter.com)



# SUBCONTRACTOR SAFETY PACKAGE

REVISION / APPROVAL	NAME & POSITION	DATE	SIGNATURE
Reviewed by:			
Reviewed by:			
Reviewed by:			
Approved by:			



# INDEX OF SAFE WORK PRACTICES (SWP)

REVISION / APPROVAL	NAME & POSITION	DATE	SIGNATURE
Reviewed by:			
Reviewed by:			
Reviewed by:			
Approved by:			



# INDEX OF SAFE JOB PROCEDURES (SJP)

REVISION / APPROVAL	NAME & POSITION	DATE	SIGNATURE
Reviewed by:			
Reviewed by:			
Reviewed by:			
Approved by:			