





Health & Safety Program		Approved by	
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**C&M Electric**

## Health & Safety Program

**Ken Crawford**

President

**Disclaimer:** This H&S Manual has been prepared to aid workplace parties in understanding C&M Electric's policies and programs under the Occupational Health and Safety Act (OHSA) and the regulation however it is not intended to replace the OHSA, or the regulations and reference must always be made to the current version of the legislation.

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# Health and Safety Program

## Introduction and Scope of C&M Electric Health and Safety Program

Health and Safety is one of the main pillars that plays a particularly vital role in achieving success for C&M Electric. Our management is committed to providing and maintaining a safe and healthy working environment for employees and any person in the workplace.

In demonstrating our due diligence, C&M Electric will make every reasonable effort to provide a working environment that minimizes risk of incidents or personal injury, ill health, or property damage. The purpose of this manual is to provide employees with policies and programs governing their safe work practices. It will provide a clear set of guidelines for activities that if followed rigorously will reduce accidents and incidents of occupational injuries and illnesses.

This manual provides a framework for a comprehensive occupational health and safety system at C&M Electric. It implements rigorous standards that everyone must meet to ensure a safe and healthy workplace.

Every employee at C&M Electric is required to be familiar with the elements of the manual that apply to them and to complete all the training programs provided by C&M Electric as required. All employees are responsible for following safety policies and procedures in their work areas. The intent of these programs is not to affect the quality, the quantity or the freedoms normally associated with an employee's work.

Our management team is willing to hear specific concerns as they arise and to assist personnel involved with meeting the requirements as defined that will meet the spirit of these programs while protecting our employees and company assets.

C&M Electric will ensure that the health and safety program is working effectively, by taking adequate steps which will include responsibility and accountability, competency and training, documentation, and communication.

## Health and Safety Objectives

Management will ensure continual improvement by establishing measurable health and safety objectives for our organization. Objectives will focus on reducing harmful and/or risky exposures, occupational injuries and/or occupational diseases in the workplace.

Health and safety objectives will:

- Be set and we will assign responsibility for achieving the objectives through a documented Action Plan.
- Be practical and achievable.
- Contain time frames.
- Be clear and measurable.
- Identify responsibilities.
- Have documented approval by senior management.

Once annually we will set our annual goals and objectives with the sole intent of improving the effectiveness of our policies and procedures and to ensure compliance to the *Occupational Health and Safety Act* and applicable Regulations and industry standards.

Goals and objectives will be determined from the results of our performance level in the previous year's audit. Management will assign responsibility for its targets and will establish a timeline for completion.

C&M Electric's targets for our safety and health management are to:

- Achieve 100% legal compliance.
- Reduce incidents rates.
- Ensure required training is conducted.
- Complete inspections and audits as required by applicable legislation.

### **Networking**

Networking, as it applies to Health and Safety, involves the gathering of acquaintances or contacts to share information about health and safety in the workplace. Networking supplies an excellent opportunity for us to capitalize on external resources for the purpose of obtaining information about products and technical skills. It also allows us to gather data, both positive and negative, on issues that should help us to improve our best work practices. C&M Electric's goal will be to network with other firms for the purpose of health and safety, as often as reasonably practical.

## **Health and Safety Responsibilities**

### **Internal Responsibility System (IRS)**

Ontario's *Occupational Health and Safety Act (OHSA)* sets out the rights and duties for occupational health and safety of all workplace parties. One of the primary purposes of the OHSA is to facilitate a strong Internal Responsibility System (IRS) in the workplace. The IRS means that everyone in the workplace - employer, managers, supervisors, and workers - has a role to play in keeping workplaces safe and healthy. Each person takes initiative on health and safety issues and works to solve problems and make improvements on an ongoing basis. They do this both individually and co-operatively with others. Successful implementation of the IRS should result in progressively longer intervals between accidents or work-related incidents.

### **Employer Responsibilities**

Employer responsibilities include but are not limited to the following:

- Legal Obligations
  - Ensure that all applicable legal and other requirements are complied with.
  - Provide and maintain a safe, healthy work environment.
  - Ensure all workers working on a construction project are over the age of 16.
  - Post a copy of the OHSA in the workplace, as well as explanatory material prepared by the Ministry of Labour, Training and Skills Development that outlines the rights, responsibilities, and duties of employees in both English and in the majority language in the workplace.
- Joint Health and Safety Committee / H&S Representative
  - Ensure the establishment of a H&S Rep as required in the Occupational Health and Safety Act.
  - Provide support, compensation, training, and time to JHSC members.
  - Ensure that, on workplaces where the number of regularly employed workers exceeds five, on a project of a duration that exceeds three months that a Health and Safety Representative is chosen by the workers.
  - Ensure the workers select the Health and Safety Representative(s) and that those they select do not exercise managerial functions.
  - Require contractors to ensure a Health and Safety Representative(s) be selected by their workers

where the number of employees regularly exceed five (5). The Sub-contractor will communicate the name of his Health and Safety Representative to us.

- Support and cooperate with Health and Safety Representatives and JHSC.
- Respond to written recommendations received by Health and Safety Representative(s) within twenty-one (21) days.
- Provide the JHSC with the results of any occupational health and safety report that the employer has. If the report is in writing, the employer must also provide a copy of the parts of the report that relate to occupational health and safety.
- Advise employees of the results of such a report. If the report is in writing, the employer must, on request, make available to workers copies of those portions that concern occupational health and safety.
- Notify a director of the MLTSD if a JHSC 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 employees
- Ensure that every part of the physical structure of the workplace, whether it is temporary or permanent, is inspected at least monthly.
- Safety Policy and Program
  - Establish a safety policy and, when necessary, train personnel.
  - Review, at least annually, and revise, when necessary, our Health and Safety Program.
  - Provide resources to implement support and enforce the Health and Safety Program.
  - Ensure the development of a corporate Visitors Policy.
  - Ensure compliance with our Health and Safety Program.
  - Assign an individual to coordinate our Health and Safety Program.
  - Post a copy of the occupational health and safety policy in the workplace, where employees will be most likely to see it.
- General Duty
  - Take every reasonable precaution for the protection of the workers.
  - Take corrective measures to correct substandard acts and/or conditions.
  - Take every precaution reasonable in the circumstances for the protection of an employee.
- Supervision
  - Provide competent supervision for all workers.
  - Appoint competent persons as supervisors.
  - "Competent person" is a defined term under the OHSA as a person who:
    - Is qualified because of knowledge, training, and experience to organize the work and its performance,
    - Is familiar with the act and the regulations that apply to the work, and
    - Has knowledge of any potential or actual danger to health or safety in the workplace.
  - Ensure compliance with WHMIS regulations.
  - Commend positive health and safety behaviors.
  - Ensure supervisors complete weekly inspections and deliver weekly safety talks.
- Equipment, Personal Protective Equipment and Tools
  - Provide and maintain in good working order:

- Equipment
  - Materials
  - Safety equipment and protective devices
- Ensure equipment and machinery are used safely.
- Inform an employee or a person in authority over an employee, about any hazard in the workplace and train that employee in the handling, storage, use, disposal and transport of any equipment, substances, tools, material, etc.
- Training
  - Instruct, inform, and supervise employees to protect their health and safety.
  - Ensure workers are trained in Legislated Health and Safety responsibilities and industry standards.
  - Ensure all workers receive Health and Safety Awareness training– 4 Step Program.
  - Ensure all supervisors receive Health and Safety Awareness training – 5 Step Supervisors Program.
- Emergencies, Incidents or Accidents
  - Establish written emergency procedures.
  - Report accidents and injuries to authorities as required.
  - Investigate all injuries and accidents and take corrective measures.
  - Assist in a medical emergency by providing any information, including confidential business information, to a qualified medical practitioner and other prescribed persons for the purpose of diagnosis or treatment.
- Subcontractors and Suppliers
  - Ensure all contractors receive the necessary information to ensure compliance to the C&M Electric Health and Safety Program, policies, safe work practices and procedures.
  - Ensure all companies involved with a project, in any manner, submit a signed Contractor Agreement prior to the commencement of work.
- Workplace violence and workplace harassment
  - Prepare policies with respect to workplace violence and workplace harassment and review them at least once a year.
  - Ensure the policies in writing and posted in the workplace where employees are likely to see them.
  - Set up and maintain programs to implement the workplace violence and workplace harassment policies.
  - The workplace violence program must include the following:
    - Measures and procedures to control risks identified in an assessment of risks as likely to expose an employee to physical injury.
    - Measures and procedures for employees to report incidents of workplace violence.
    - Measures and procedures for summoning immediate assistance when workplace violence occurs or is likely to occur.
    - How the employer will investigate and deal with incidents or complaints of workplace violence.
    - How certain employees will be informed of the results of the investigation and of any corrective action.
    - The employer must provide appropriate information and instruction to employees on the contents of the workplace violence and harassment policies and programs.

- The workplace violence and harassment programs will be reviewed as often as necessary, but at least annually, to ensure it is current and valid.
- Hazardous Materials
  - Identify hazardous materials in the prescribed manner, e.g., labels.
  - Obtain or prepare (as may be prescribed) current Safety Data Sheets (SDSs) for all hazardous materials in the workplace.
  - Ensure employees who are exposed or likely to be exposed to hazardous materials and hazardous physical agents receive, and that the employees participate in, prescribed instruction and training.
  - Assess all biological and chemical agents that the employer produces for its own use to determine if they are hazardous materials.
  - Prescribe information related to hazardous materials as set out in Regulation 860 (WHMIS), which includes more detailed requirements related to employee education, labelling and safety data sheets, among other things.
- Workplace Safety and Insurance Board (WSIB)
  - Post the WSIB Form 82 in a visible location.
  - Report workplace incidents to the WSIB within three (3) days when the incident causes an employee to:
    - Lose time from work
    - Earn less than their regular day's pay
    - Receive healthcare treatment
    - Have a modified work at less than regular pay
    - Have a modified work at regular pay for more than seven calendar days following the date of accident (in this case, the reporting obligation begins on the eighth day of modified work)
  - Keep records of the incident, how it was managed, and the time it takes for the employee to recover.
  - Report any circumstantial changes that affect the employer's obligations to the WSIB within 10 days.
  - Stay connected with the employee to help ensure they return to suitable and available work. This includes:
    - Contacting the employee as soon as possible after the injury or illness.
    - Maintaining appropriate, and regular, communication with the employee throughout their recovery and return to work.
    - Providing suitable work that is available and within the employee's functional abilities and restores as much of their pre-injury earnings as possible.

### **Supervisors Responsibilities**

Supervisor responsibilities include but are not limited to the following:

- Ensure that an employee works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and the regulations.
- Ensure that any equipment, protective device, or clothing required by the employer is used or worn by the employee.
- Advise an employee of any potential or actual health or safety dangers known by the supervisor.



- If prescribed, provide an employee with written instructions about the measures and procedures to be taken for the employee's protection.
- Take every precaution reasonable in the circumstances for the protection of employees.

### **Employee Responsibilities**

Employees play a key role in health and safety at the workplace, employee responsibilities include but are not limited to the following:

- Work in compliance with the Act and regulations.
- Use or wear any equipment, protective devices or clothing required by the employer.
- Report to the employer or supervisor any known missing or defective equipment or protective device that may endanger the employee or another employee.
- Report any hazard or contravention of the Act or regulations to the employer or supervisor.
- Not remove or make ineffective any protective device (i.e., guard) required by the employer or by the regulations. If a guard must be removed, a temporary protective device must be installed.
- Not use or operate any equipment or work in a way that may endanger any employee.
- Not engage in any prank, contest, feat of strength, unnecessary running, or rough and boisterous conduct.

### **Joint Health and Safety Committee Responsibilities**

The Joint Health and Safety Committee (JHSC) acts as a link between workers and employers in supporting occupational health and safety at the workplace. As part of the Internal Responsibility System (IRS), the HSR helps prevent workplace injuries, illnesses, and deaths. Key responsibilities and powers of JHSC under the OHSA include:

- Identify actual and potential hazards in the workplace.
- Obtain information from the employer relating to health and safety in the workplace.
- Inspect the workplace on a regular basis.
- Be consulted about and have a worker JHSC member present at the beginning of any health and safety-related testing in the workplace.
- Recommend health and safety improvements in the workplace.
- Hold meetings at least once every three months.
- Participate in the incident investigation process.

### **Health & Safety / Operations Coordinator**

- Assist management in the development and implementation of Health and Safety Policies and Program.
- Review, as necessary but at least annually, and makes recommendations on the review of our OHSMS.
- Stay current with all legal and other requirements.
- Promote safety and health education at all levels.
- Co-ordinate all safety activities including training of employees, job-site inspections, safety meetings, distribution of safety materials.
- Participate in the incident investigation process and maintain all accident/incident records, investigation reports and complete all required WSIB forms.
- Participate in the incident investigation process.

- Analyze accident and Incident records and show trends.
- Provide regular reports to upper management on the results of the safety program and provides options and training for corrective actions.
- Prepare the annual audit of C&M Electric's OHSMS.

### **Subcontractors Responsibilities**

Any contractor or supplier engaged by C&M Electric must:

- Ensure that every employer and employee on the project complies with the Act and regulations.
- Ensure the health and safety of employees on the project are protected.
- Ensure all employees are trained in accordance with the legal requirements and always have training records and certificates available at the work site.
- Ensure a clean, safe, and healthy workplace, and comply with any request from C&M Electric for the clean-up or correction of any unsafe or hazardous condition caused by work performed by their employees.
- Ensure that no controlled product under WHMIS regulations is brought on or stored on site without the prior knowledge of C&M Electric.
- Provide SDS sheets for products brought to site and ensure all labelling requirements are complied with.
- Plan and execute all work in a manner that complies with all legislated regulations and C&M Electric's health and safety program.
- Report all accidents and injuries and investigate lost-time accidents.
- Cooperate with all safety representatives having jurisdiction at the site.
- If there is any doubt regarding the meaning or interpretation of our program, they must contact the job supervisor.
- Ensure that all employees and supervisors have received the appropriate safety training relating to their job.
- When there is an imminent danger, take immediate actions to stop the operation and evacuate employees as appropriate.

## Health and Safety Policy Statement

Each year C&M Electric Senior Management will set and review Occupational Health and Safety (OHS) objectives and we will strive to continually improve our Occupational Health and Safety Management System (OHSMS) and Occupational Health and Safety (OHS) performance.

C&M Electric recognizes the right of our workers to work in a safe, healthy work environment and will strive to ensure such for the prevention of injuries and illness.

C&M Electric will ensure compliance with the *Occupational Health and Safety Act*, applicable regulations, and other requirements to which we subscribe.

C&M Electric has adopted a team management style where we are committed to working in a spirit of consultation and co-operation with all our employees in pursuit of our objectives. The responsibilities of workplace parties which includes Senior Management, Supervisors, Workers, H&S Coordinator and H&S Representatives will be addressed as part of the 14 Program Elements.

Senior Management has developed, implemented, maintains, and monitors a comprehensive company health and safety program, which helps us to define a plan of action designed to prevent incidents, accidents and occupational diseases which includes the elements required by the health and safety legislation at a minimum.

Every person employed in Canada has the right to a safe and healthy work environment. Our employees play a key role in preventing work-related injuries and diseases. Our employees have an obligation to work in a manner that ensures their own health and safety and that of any person who may be affected by their work. Workers also have three legal rights: 1) the right to know about hazards in the workplace and how to protect themselves, 2) the right to participate in identifying and correcting work-related health and safety concerns and, 3) the right to refuse work they believe is unsafe.

At least annually, this policy statement will be reviewed by C&M Electric Senior Management, for completion, accuracy, and effectiveness and to ensure it is current with legislated requirements.

This policy statement will be posted on all health and safety bulletin boards, including in the Worker H&S Manual, and will be located in all on-site Health and Safety Binders. The intent of the policy statement will be communicated during the New Worker Orientation Program in which all workers will complete an Acknowledgment and Agreement Form confirming that they've understood and read the workplace health and safety policies. The policy statement will be re-communicated at the Annual H&S Meeting and is readily accessible to all employees as it's posted on the C&M Electric website.



**Ken Crawford**

President, C&M Electric

January 31, 2023

## Violence in the Workplace Policy Statement

The management of C&M Electric is committed to the prevention of workplace violence and is ultimately responsible for worker health and safety. We will take all reasonable steps to protect our workers from workplace violence from all sources.

Violent behaviour in the workplace is unacceptable from anyone. This policy applies to management and all employees. Everyone is expected to uphold this policy and to work together to prevent workplace violence.

There is a workplace violence awareness program that implements this policy. It includes measures and procedures to protect workers from workplace violence, a means of summoning immediate assistance and a process for workers to report incidents or raise concerns.

As the employer, C&M Electric, will ensure this policy and the supporting program are implemented and maintained and that all workers and supervisors have the appropriate information and instruction to protect them from violence in the workplace.

Supervisors will adhere to this policy and the supporting program. Supervisors are responsible for ensuring that workers follow measures and procedures and that workers have the information they need to protect them.

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 to report any violent incidents or threats.

Management pledges to investigate and deal with all incidents and complaints of workplace violence in a fair and timely manner, respecting the privacy of all concerned as much as possible.



**Ken Crawford**

President, C&M Electric

January 31, 2023

## Harassment in the Workplace Policy Statement

C&M Electric is committed to providing a work environment in which all workers are treated with respect and dignity. Workplace harassment will not be tolerated from any person in the workplace including workers, apprentices, clients, and subcontractors.

The workplace harassment program applies to all workers including managers, supervisors, temporary employees, students, and subcontractors.

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.

Reasonable action taken by the employer or supervisor relating to the management and direction of workers or the workplace is not workplace harassment.

If a worker has been a victim of or a witness to workplace harassment, workers can report incidents or complaints of workplace harassment verbally or in writing using the Incident/Accident Report. C&M Electric will ensure that an investigation appropriate in the circumstances is conducted when the employer, human resources, a manager, or supervisor becomes aware of an incident of workplace harassment or receives a complaint of workplace harassment.



**Ken Crawford**

President, C&M Electric

January 31, 2023

## Health and Safety Policies

The purpose of Health and Safety Policies is to communicate the organization's commitment, support and attitude to Health and Safety. As well as the principles and goals embodying this commitment. All workplace parties, including suppliers and contractors must regard the Health & Safety Policies as a directive for compliance with the Health and Safety Program.

### Roles and Responsibilities

Senior Management:

- Ensure the Health and Safety Policies are created, signed, and reviewed annually as per the Occupational Health and Safety Act.
- Ensure communication and distribution of these policies to all employees.

Supervisors:

- Will be trained and held responsible for ensuring that the employees, under their supervision, follow this policy.

Workers:

- Follow policies, procedures, rules, and instructions as prescribed by C&M Electric.

Operations / H&S Coordinator:

- Ensures documents are approved by management prior to distribution, as required.

Joint Health and safety Committee / H&S Representative:

- Is consulted on and provides input on the Health and Safety Policies.

### Procedure

#### Health and Safety Policy

The Health and Safety Policy statement will:

- Contain a written statement of principles and goals.
- Be signed by the chief executive officer.
- Be dated.
- Recognize the need to comply with the Occupational Health and Safety Act and applicable regulations.
- Acknowledge the right of every employee to work in a safe and healthy environment.
- Spell out management's commitment to providing a safe and healthy work environment by eliminating or minimizing the hazards that can cause accidents and injuries
- Recognize the priority of safety in relation to other organizational goals and policies
- Encourage cooperation with unions and workers to involve all employees in putting the health and safety policy into practice
- As well, the policy will be:
  - Clearly stated in terms that are easily understood.
  - Posted in a conspicuous place and distributed and explained to all employees.
  - Followed by every employee, including senior management, in all work activities.

- Reviewed annually to keep it up-to-date and in tune with current activities of the organization and with the latest legislation.

### **Workplace Violence Policy**

The workplace violence policy will:

- Show the employer's commitment to protecting workers from workplace violence.
- Address violence from all possible sources (customers, clients, employers, supervisors, workers, strangers, and domestic/intimate partners).
- Outline the roles and responsibilities of the workplace parties in supporting the policy and program.
- Be dated and signed by the highest level of management of the employer or at the workplace as appropriate.

### **Workplace Harassment Policy**

The workplace harassment policy will:

- Show the employer's commitment to addressing workplace harassment.
- Consider workplace harassment from all sources such as customers, clients, employers, supervisors, workers, strangers, and domestic/intimate partners.
- Outline the roles and responsibilities of the workplace parties in supporting the policy and program.
- Be dated and signed by the highest level of management of the employer or at the workplace as appropriate.
- The workplace harassment policy should encourage workers to bring forward workplace harassment concerns, whether their own, or information about workplace harassment that they have witnessed.

### **Communication**

The health and safety policies will be communicated and distributed to all workers as part of the New Worker Orientation, will be posted on all health and safety boards or binders and on the internal webpage.

## **Workplace Harassment and Violence**

C&M Electric will periodically assess the risk of violence in the workplace. Assessments and reassessments will be documented and will identify the potential violence risks in the workplace.

C&M Electric will develop specific controls to eliminate or mitigate risks for all identified risks that are associated with violence. The program will include measures and procedures for summoning immediate assistance when workplace violence occurs or is likely to occur.

### **Definition**

Workplace Harassment - 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. Workplace harassment may include bullying, intimidating or offensive jokes or innuendos, displaying or circulating offensive pictures or materials, or offensive or intimidating phone calls.

Workplace Violence - Workplace violence means the exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker; an attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to the worker; a statement or behaviour that it is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker.

Sexual Harassment - 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.

Workplace Party - A workplace party is a person, visitor, contract or temporary worker or group inside the workplace concerned with or affected by the OH&S perform of the organization.

Domestic Violence - Domestic Violence in the Workplace includes any person who has a relationship with a worker – such as a spouse, a former spouse, current or former intimate partner or family member – who may physically harm or attempt or threaten to physically harm a worker at work. Domestic violence can put a targeted worker at risk and may also pose a threat to co-workers.

## **Roles and Responsibilities**

All employees share the responsibility to support a violence, harassment, and sexual harassment free workplace.

### **Senior Management**

- Provide a workplace free from all forms of violence, harassment or sexual harassment, threats of violence, harassment or sexual harassment and other disruptive behaviour.
- Prepare and review, at least annually, a policy on workplace violence, as required by the OHSA. The president will sign the Violence and Harassment Policy Statements at least annual.
- Post policies on H&S bulletin boards, included in the Worker H&S Manual, and all Site- Specific Safety Plans (SSSP).
- The policy statement includes the right of the workers to work in a violence and harassment free work environment. This right will also include the right to work in a sexually harassing or violent environment.
- Conduct risk assessments of the workforce, the work being performed, and the exposure of workers to threats by the public, clients, workers from other trades, etc. When a risk of violence, harassment or sexual harassment occurring in the workplace is suspected, management will put measures into place for the protection of the worker.
- Conduct reassessments as often as necessary.

### **Supervisor**

- Ensure that violence, harassment, or sexual harassment is not tolerated, ignored, or condoned.
- Conduct risk assessments of the workforce, the work being performed, and the exposure of workers to threats by the public, clients, workers from other trades, etc.

### **Workers**

- Do not threaten violence, harass, sexually harass, or engage in any violence, harassment, or sexual harassment behaviour in the workplace, at any work-related functions, or in any other work-related circumstances.
- Report any incidents of violence, harassment or sexual harassment or threatened violence, harassment, or sexual harassment in the workplace to their supervisor.
- Co-operate fully in any investigation of a violence, harassment, or sexual harassment incident.
- Treat all other employees and members of the public with respect and dignity.



### **H&S / Operations Coordinator**

- Assist management in the development and implementation of this policy.

### **H&S Representative or JHSC Members**

- Be consulted on and make recommendations on the applicable policies and procedures.

### **Subcontractors**

- Ensure your workers work in compliance with this policy.

### **Visitors to the Site**

- Comply with this policy.

### **Forms**

C&M Electric will use the following for the purposes of this policy and procedure:

Violence and Harassment Report	VH2 A F1
Visitor Agreement	COM2 A F5
Worker Orientation Package	TRA2 A F3

### **Risk Assessment**

C&M Electric will address violence from all possible sources (customers, clients, employers, supervisors, workers, strangers, and domestic/intimate partners). We will assess the risks of violence, harassment or sexual harassment that may arise from the nature of the workplace, the type of work, or the conditions of work. Assessments will be documented and signed by a competent person. The assessment will consider, (a) circumstances that would be common to similar workplaces; (b) circumstances specific to the workplace; and (c) any other prescribed elements.

C&M Electric will repeat the assessment as often as necessary, but at least annually, to ensure the workplace violence policy and related programs effective in protecting workers from workplace violence and harassment. Relevant workplace parties will be informed of the results of re-assessments. Assessments and reassessments will be conducted by a competent worker.

Hazard	Rank Pre Post	Controls	PPE & Safety Devices	Training
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Workplace violence or harassment	Pre B Post C	<p>Never enter a situation/location where you feel threatened/unsafe. Exercise your right to refuse work.</p> <p>Never give out the physical location of a worker to a stranger.</p> <p>Make a scene, yell, or scream as loudly as possible. Try shouting words like STOP, FIRE or HELP.</p> <p>If you are being pulled along or dragged, fall to the ground and roll.</p> <p>Blow a whistle, activate your personal security alarm, or push the security alarm.</p> <p>Give bystanders specific instructions to help you. i.e., "You in the yellow shirt, call the police."</p> <p>If someone grabs something that belongs to you, do not resist. Throw the item on the ground several feet away from them and run in the opposite direction, yelling "help" or "fire."</p> <p>Run to the nearest safe place.</p> <p>Call the police immediately after the incident. File an incident report.</p> <p>Report to the supervisor/management if you fear domestic may enter the workplace.</p> <p>Management, procedures will be developed and implemented for the protection of the worker.</p> <p>Consider taking a self-defense course.</p>	Adequate means of communication	<p>Violence and Harassment Policy &amp; procedures</p> <p>First Aid, if required</p> <p>Working Alone, where required</p>
Domestic Violence	Pre B Post C	<p>Report to the supervisor/management if you fear domestic violence may enter the workplace.</p> <p>Management will investigate and deal with the concerns.</p> <p>Never give out the physical location of a worker to a stranger.</p>		
High Risk Work Location	Pre B Post C	<p>Never enter a situation/location where you feel threatened/unsafe.</p> <p>Management will decide specific procedures on a case-by-case basis and procedures may include:</p> <ul style="list-style-type: none"> <li>▪ Using the "buddy" system.</li> <li>▪ Rescheduling work to a safer time of day.</li> <li>▪ Establishing regular check in times for the duration of the project.</li> </ul>		
Isolated Work Locations	Pre B Post C	<p>Ensure vehicle is maintained and in good working order.</p> <p>Ensure a full tank of gas.</p> <p>Be equipped with an adequate means of communication.</p>		

Violence due to a robbery	Pre B Post C	Never challenge the thief. Do not chase a thief. If someone grabs something that belongs to you, do not resist. Throw the item on the ground several feet away from them and run in the opposite direction, yelling "help" or "fire." Retreat to a safe area. When safe, management and/or the police.		
Opening/closing the shop/office	Pre B Post C	Only authorized persons will be issued keys/access codes. The last person leaving for the day is responsible to ensure all doors are locked. Lighting will be provided at all access points. If lighting is not functional, report to the supervisor. If you notice a stranger in the yard either re-enter the building or do not approach the building, Contact management and/or the police.		
Required to work alone	Pre B Post C	Be equipped with an adequate means of communication. Ensure batteries are charged. Work in accordance with Working Alone Procedure Use a buddy system for regular check ins. Be trained in first aid.		
Working out of a company vehicle	Pre B Post C	Be equipped with an adequate means of communication. Ensure batteries are charged. Work in accordance with Working Alone Procedure Use an established check-in procedure or use buddy system. Be trained in first aid. Ensure vehicle is maintained and in good working order. Know emergency numbers and after-hours emergency number. Ensure that someone is aware of where and when you are expected somewhere.		

### Confidentiality

Management and supervisors have a duty to provide information to a worker, including personal information, which is related to a risk of workplace violence from a person with a history of violent behaviour if:

- The worker can be expected to encounter that person in the course of their work.
- The risk of workplace violence is likely to expose the worker to physical injury.

We will make every effort to ensure appropriate confidentiality where an incidence of violence, harassment or sexual harassment has occurred.

### The Right to Refuse Unsafe Work

Workers have always had the right to refuse work if workplace violence is likely to endanger the worker.

### **Summoning Help**

- Workers will summon immediate help assistance when workplace violence occurs or is likely to occur.
- Call out to attract attention of those around their workstation.
- In the event there is no immediate assistance available the worker will:
  - o In the case of extreme danger call the local police.
  - o Call the emergency numbers provided by our team.

### **Procedures for Responding to a Physical Attack**

If you are attacked:

- Make a scene, yell, or scream as loudly as possible.
- Try shouting words like STOP, FIRE or HELP.
- If you are being pulled along or dragged, fall to the ground and roll.
- Give bystanders specific instructions to help you. i.e., "You in the yellow shirt, call the police."
- If someone grabs something that belongs to you, do not resist. Throw the item on the ground several feet away from them and run in the opposite direction, yelling "help" or "fire."
- Do not chase the suspect.
- Run to the nearest safe place.
- Call site security or the police immediately after the incident.
- File an incident report.
- Take a self-defense course.

### **Procedures for Working Alone**

- Have access to a cellular telephone or similar means of communication.
- Use an established check-in procedure.
- Ensure that someone is aware of where and when you are expected somewhere.
- Be alert and make mental notes of your surroundings when you arrive at a new or different setting.
- Use a buddy system especially when you feel your personal safety may be threatened.
- Exercise your right to refuse work in clearly hazardous situations.
- Disclose feelings of discomfort or apprehension to your supervisor.
- Do not enter any situation or location where you feel threatened or unsafe.

### **Procedures for Use of Company Vehicles**

Vehicle drivers have an increased risk of workplace violence or harassment as they often work alone, therefore:

- All vehicles must be locked when not occupied and while driving.
- All truck drivers will carry a fully charged phone.
- Trucks be equipped with Vehicle H&S Binder containing emergency procedures and contact numbers.
- Vehicles, when not on the lot, should be parked in a spot where there is adequate lighting and where they are visible to lower the risk of break ins.
- Use of a buddy system, where possible.
- Workers, working alone, should never enter a building or situation when they feel at risk.
- Should a worker approach their vehicle and they suspect that someone is trying to steal the vehicle, they should shout out for the person to stop. If they do not stop, the worker should retreat to a safe place and call the police. Remain at the safe place until the police arrive.

- If a worker has any concerns, they should report to management.

### **Procedures for Reporting Incidents**

C&M Electric requires that all incidents involving violence, harassment or sexual harassment in the workplace are to be reported to the supervisor or a member of management immediately. Reports can be made orally or a written report using our Violence and Harassment Report.

Once the supervisor becomes aware of violence, harassment or sexual harassment, or the threat of violence, harassment or sexual harassment, action must be taken in accordance with this policy. If the supervisor becomes aware of violence or harassment in the workplace, or the threat of violence or harassment and the worker(s) has failed to report it, the supervisor will approach the worker(s) and assist them in making a report.

It may be necessary for supervisors to report incidents of violence or harassment if the employee who is the victim of violence or harassment is reluctant, too frightened, or otherwise unable to do so.

### **Procedures for Reporting Threats of Domestic Violence**

Workers must report their concerns to the supervisor/management if they fear the domestic violence may enter the workplace. Management will investigate and deal with these concerns on a case-by-case basis. When deemed necessary by management, procedures will be developed and implemented for the protection of the worker.

### **Procedures for Reporting Harassment**

If a worker believes they are being harassed and/or sexually harassed, they should speak up immediately. Do not ignore it or feel guilty. If possible, and only if the worker feels comfortable, they should tell the person that they are not comfortable with their behaviour, that they want it to stop and warn the harasser that any continuation will not be ignored. In the case of on-going, harassment or sexual harassment, the worker should report each and every incident to the supervisor. The worker must submit a report in writing. If the supervisor fails to act, contact senior management, H&S Representative, or member of the JHSC or H&S / Operations Coordinator.

### **Procedures for Investigations**

Management will investigate and deal with incidents or complaints of violence, harassment, or sexual harassment.

The supervisor and/or management within a timely manner will investigate all reports of violence, harassment, or sexual harassment. When applicable, reports will be submitted to the Joint Health and Safety Committee and/or Health and Safety Representative for review.

Action taken by management will be determined on an individual case basis. Management will report an incident to the police and/or WSIB and/or MLTSD in the event of physical injury or extreme harassment, or any other circumstance deemed necessary by management.

A worker who has allegedly experienced violence, harassment or sexual harassment and the alleged harasser will be informed of the results of the investigation and of any corrective action taken.

### **Reprisals**

Any form of retaliation against employees exercising their rights under this policy will be considered a serious violation of this policy and will not be tolerated. Such retaliatory actions may be subject to disciplinary action, up to and including dismissal.

### **False Accusations**

Any employee found to have lodged or otherwise supported a false accusation will be subject to appropriate disciplinary action up to and including dismissal.

### **Training**

Senior Management will ensure that affected employees receive adequate training to ensure the effective implementation of this policy. Training may be formal or informal being delivered either one-on-one with the worker(s), through courses provided by a competent worker and/or through 3rd party trainers.

### **Record Keeping**

All documents and records generated by the implementation of this policy, will be kept on file. Documents and records will be maintained as per the procedure outlined in the Document and Record Control.

### **Communication**

This policy will be communicated to all C&M Electric employees by way of meetings, safety talks, or any other method deemed effective by management.

### **Evaluation**

This policy will be evaluated at least annually by management, the JHSC, workers and H&S Coordinator. Evaluations will ensure the policy is compliant with current legislation, industry standards and that the policy is being implemented as required and that it is effective.

## Document and Record Control

Document control is about transferring information between relevant parties. C&M Electric will ensure that the information in all documents is accurate and will control the documents to ensure they remain current. In the event that information contained in a document needs to be altered, placing controls on the document ensures that the document always contains the correct information. The purpose of this procedure is to define methods for document and record control within our company.

### Relevant Definitions:

Document - Medium containing information related to the OHSMS i.e., H&S policy and manual, procedure, instruction, form, etc.

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

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

Active records - Records in constant use that need to be retained in the office close to users.

Semi-active records - Records no longer used constantly, but are required for reference, legal, audit, or other purposes. Semi-active records may be transferred to on-site or off-site secured storage to free-up limited.

### Forms

C&M Electric will use the following form for the purposes of this policy and procedure:

Document Change Record	DOC2 A F1
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### Roles and Responsibilities

#### Senior Management:

- Approve all documents generated and necessary as part of our OHSMS.
- Appoint a person to be responsible for the day-to-day management of documents.
- Responsible for document control activities as specified in this procedure.

#### Project Managers / Supervisors

- Ensure that documents and records generated at the project level are completed as required and are submitted to the appropriate parties in a timely manner.

#### Supervisors

- Ensure that documents and records generated at the site level are completed as required and are submitted to the H&S Coordinator in a timely manner.

#### Operations / H&S Coordinator

- Responsible for the day-to-day management of documents and records in compliance with this Policy

and Procedure.

- Ensures documents are approved by management prior to distribution, as required.
- Responsible for the storage and maintenance of documentation of eCompliance.

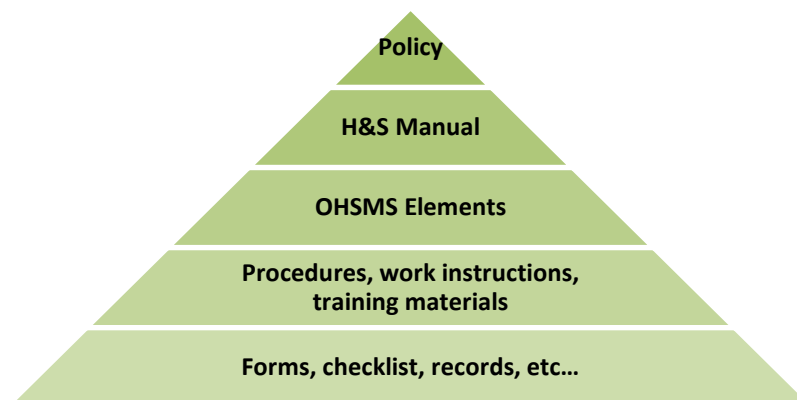
#### **Workers**

- Responsible for following the document control methods defined in the procedure
- Review documents and records.

Senior Management, in consultation with the H&S Coordinator and H&S Consultant will determine documents and records deemed necessary for the effectiveness of OHSMS. The list of documents will be re-evaluated annually at the Management Review meeting based on OHS performance, employee feedback and developments in legal requirements. Documents and records determined by our team to be necessary for the effectiveness of the OHSMS include but are not limited to:

• Incident/Accident Reports	• New Worker Orientation
• Site Specific Safety Plans (SSSP)	• H&S Policy and Program
• Workplace Inspections	• Training Records
• JHSC Meeting Minutes	• Statistics Reports
• Change Management Plan	• Company H&S Assessment
• Management Review Minutes	• Safety Talks

#### **Document and Record Hierarchy:**



#### **Document Management:**

- All H&S documents will be stored on eCompliance to facilitate the management of H&S documentation.
- Management has final responsibility for the review and approval of all documents prior to release/use, which includes initially released documents and documents that have been changed. C&M Electric utilizes the following 3-step review process prior to the release/use of H&S Documentation:



1. The H&S Coordinator performs a review of the H&S document to ensure OHSMS conformance.
2. The H&S Coordinator will seek the input of the Project Manager/Foreman in the event of the following:

- Creation of a Site-Specific Safety Plan
- Changes to any H&S Forms
- Changes to Incident/Accident Forms
- Changes to the Worker Task Manual.

3. Senior Management will provide final approval.

- The first page of all policies and procedures will have the name, position, signature, and the date of the person approving the document.
- Site and Project documents will be approved by the Project Managers/Supervisors unless otherwise prescribed in individual policies and procedures.
- All documents requiring specific approval, and/or approval of multiple persons, will have a section on the document indicating where the approving bodies must sign off providing their name, position, signature, and the date of approval.
- Management and the Operations/H&S Coordinator will ensure that documents are regularly reviewed at least annually and during periods of significant change and updated where applicable by a competent person to ensure that the information is current. Multiple drafts may be created which will not require approval however, prior to release of the final draft the document will be approved.
- Documents will be reviewed prior to release to ensure that:
  - It complies with legal and other legislation, industry standards etc.
  - Includes unique identifier, revision, and page information.
  - Where needed, management ensures other affected parties have an opportunity to perform a timely review of the new or changed items prior to final release approval.
- If, as a result of the review process, a document is significantly revised, the document will be re-approved as outlined in the Document Approval section.
- To protect from unauthorized editing, documents may be locked to only allow certain changes (e.g., comments or tracked changes).
- Where practical, documents will be shared in a PDF format via eCompliance or as a printed version.
- Obsolete documents and records will be withdrawn in a manner consistent with this policy.
- When a new version of a document is created, the H&S Coordinator will upload the document onto eCompliance and SharePoint to ensure that the most relevant version is available at the point of use. As all sites are equipped with a site tablet, all workplace parties will have access to the documentation. The H&S Coordinator will also provide hard copies to site for the Foreman to post on the H&S Board or Binder. eCompliance will also store document history which will allow the H&S Coordinator to track the most relevant version of applicable documentation.
- The H&S Coordinator will upload all new documents to the C&M Electric website regularly.
- Document adoption/revisions will be tracked on our Document Change Record form (DOC2 A F1). The information to be tracked on this form will include:
  - Notation if the document has been adopted or revised.

- Details about the adoption/revision.
  - Adoption/revision date.
  - Document number and revision number.
  - The name of the person who approved the document or document change.
- The introduction of new documents or revised documents changes will be tracked using our Document Change Record. This checklist will identify where updated documents are required, how they will be communicated and if additional training is required.
- Management will ensure that any person who was given access to the original document is informed when changes have been made.
- In the event that a document change is significant, this would trigger the implementation of a Change Management Plan. Refer to the C&M Electric Change Management Policy and Procedures.

#### **Subcontractor Documents:**

- Documents originating from external sources such as subcontractor submissions will be managed in the same way as internally generated documents.
- The date of receipt, for external documents, will be recorded. If sent electronically, the email will be saved as a record.
- In the event of a revision, the document will be assigned a revision number as necessary i.e., RA or R1.

#### **Obsolete Documents:**

- When new documents are released, management will be responsible to ensure the gathering and removal of obsolete items from usage. Manuals will be gathered and updated at the same time to ensure manuals are updated with accuracy, completeness and performed in a timely manner.
- Replacement, removal, or addition of new documents will happen in a timely manner.
- All obsolete documents will be disposed of in an effective manner to be determined by management. This may include shredding.
- Obsolete documents may be retained indefinitely on site, provided they are clearly marked as "Obsolete."

#### **Privacy and Security:**

- Senior Management will ensure appropriate measures are taken for the protection of privacy and confidentiality.
- Senior Management will protect the privacy of individuals by ensuring that records containing personal information are stored in a secure environment while in the office, are protected from harm, and are confidentially destroyed by shredding.
- Supervisors will work to ensure compliance with privacy guidelines for the collection, storage, and disposal of personal information records.
- Subject to legislation and regulations, employees will follow the approved retention and disposal procedures outlined in this policy and will notify their unit supervisor of any changes to their business processes that would require updating.

- Any person who knowingly, recklessly, or negligently releases personal or confidential information without appropriate authority may be subject to disciplinary action up to and including termination of employment.
- Management will develop procedures to collect, store and allow access to personal and confidential information in keeping with the requirements of appropriate legislation and provide employees with direction concerning the appropriate release of information that they may encounter during the course of their employment.
- All Contractors who may have access to confidential or personal information will be provided with a copy of this policy and required to adhere to its requirements as a condition of their contract.
- Any person outside of our organization who may have access to confidential or personal information will be provided with a copy of this policy and required to adhere to its requirements as a condition of their contract.
- Employees who leave C&M Electric or change positions will leave all official company records for their successors, subject to approved retention and disposal procedures.

### **Readability and Legibility**

- Readability refers to the measure of how easy it is to read text. C&M Electric will make every effort to ensure all documents and forms are well-formatted to ensure they are readable.
- Legibility refers to how distinguishable individual characters and words are to the reader. C&M Electric will ensure that all documents and forms are clearly legible and well-designed to be clear and concise.
- Management will ensure that all reasonable steps are taken to ensure the care of documents to ascertain they do not get dirty, faded, torn, lost, modified without authorization, etc.
- All stored documents, either paper or electronic, will be stored in a systematic way such that they are readily available.
- The format and storage of all documents must protect a document from being rendered unreadable due to wear or damage and every document must be clearly identified through a title, document number or other suitable identification.
- All signatures must be accompanied by a printed name.

### **Index of Records**

An Index of Records is an alpha numeric system based on fundamental OHS policies of our organization.

<b>Prefix</b>	<b>Details</b>
ADMIN	Administration
AUD	Health and Safety Audit
CM	Change Management
COM	Communication
CR	Company Rules
CON	Controls
DOC	Documents and Records
EP	Emergency Preparedness
HA	Hazard Assessments

INV	Investigations and Reporting
LEG	Legislation
MR	Management Review
PPE	Personal Protective Equipment
PM	Preventative Maintenance
PC	Procurement and Contractor Management
RTW	Return to Work
STA	Statistics & Records
TRA	Training
WI	Workplace Inspections
<b>Other</b>	<b>Details</b>
F	Form
WT	Work Task
SA	Stand Alone Document
B	Binder i.e., Office, site, H&S Representative
Bk	Inspection Booklets

### Document Retention

- Records will be retained for a minimum of 5 years to demonstrate conformity to the requirements of C&M Electric's OHSMS.
- Wherever possible, records will be stored electronically on eCompliance when they are developed, or they may be scanned to create an electronic copy.
- Paper copies of forms and other documents not kept in the office, will be returned to the office once they are no longer required on site, and will be either scanned and retained electronically on eCompliance or they will be stored systematically as hard copies in storage boxes, filing systems or another safe storage container.

### Training

Senior Management will ensure that affected employees receive adequate training to ensure the effective implementation of this policy. Training will be provided to employees through safety meetings, one-on-one training or through organized and topic- specific trainings or by any other means when and where necessary.

### Record Keeping

All documents and records generated by the implementation of this policy, will be kept on file, for a minimum of five years, to show that the incident investigation and reporting procedure is being followed.

### Communication

This procedure will be communicated to all workplace parties through safety meetings, orientation or by any other method determined by management.

### Evaluation

Evaluation of the program will be done on an annual basis by management, the JHSC, workers or the Operations/H&S Coordinator. Evaluations will ensure the policy is compliance with current legislation, industry standards and that the policy is being implemented as required and that it is effective.

# Hazard Management

## Policy Statement

C&M Electric is committed to establishing, implementing, monitoring, and maintaining a documented policy statement and procedure for assessing, analyzing, and controlling hazards that is appropriate to the nature of the hazards and level of risk.

Hazard assessments provide a thorough check of work environments with the sole purpose of identifying actual and potential workplace hazards. Once hazards are identified, risks will be analyzed, and adequate control measures will be taken to mitigate the risks.

At least annually, C&M Electric will perform a comprehensive hazard assessment for all activities, equipment, processes, and property under our control.

Hazard assessments will be maintained and updated to reflect process changes and re-approved as appropriate. Ongoing hazard assessments will include introduction of new activities, materials, equipment, etc.

When assessing hazards, C&M Electric will use a team-based approach, engaging the assistance of management personnel, supervisors, workers, H&S representatives and JHSC Member.

Workplace and job specific hazards will be clearly identified in the Site-Specific Safety Plan. The assessment will identify the hazards specific to the project.

Risks will be prioritized using a standardized methodology of assigning a risk rank that will be used to prioritize risks associated with the identified hazards.

All critical tasks, those ranked as the most dangerous, will be documented and C&M Electric will communicate the activities that are associated with risks above the threshold value.

Controls will be developed for all identified hazards to include procedures, standards, checklists, supervision, monitoring, etc. and will be implemented in a timely manner.

Appropriate personnel will be informed of the control strategies. Records of communication and/or training on controls will be retained.

Management supports the process of ongoing hazard assessments. Hazard assessment and risk reduction activities will be supported by management.



**Ken Crawford**  
President, C&M Electric  
January 31, 2023

## Procedure

C&M Electric is committed to assessing, analyzing, and controlling hazards in a method appropriate to the nature of the hazards and level of risk.

At least annually, C&M Electric will perform a comprehensive hazard assessment for all activities, equipment, processes, and property under our control. Hazard assessments will be maintained and updated to reflect process changes and re-approved as appropriate. Ongoing hazard assessments will include introduction of new activities, materials, equipment, etc. When assessing hazards, C&M Electric will use a team-based approach, engaging the assistance of management personnel, supervisors, workers, and H&S representatives or JHSC Member.

Risks will be prioritized using a standardized methodology of assigning a risk rank that will be used to prioritize risks associated with the identified hazards. Controls will be developed for all identified hazards to include procedures, standards, checklists, supervision, monitoring, etc. and will be implemented.

## Relevant Definitions

Hazard - Any agent that can cause harm or damage to humans, property, or the environment. Harm – physical injury or damage to health.

Risk - The probability that exposure to a hazard will lead to a negative consequence.

Risk Assessment - A systematic process of evaluating (ranking) the potential risks that may be involved in a projected activity or undertaking.

Control – A measure taken to reduce the risk to an acceptable or manageable level by reducing either severity, probability, or both.

Unsafe Conditions – circumstances, which could allow an accident to occur. For example, might include, defective equipment, unlabeled containers, poor lighting etc.

Hazardous Acts - Unsafe acts and/or behaviour that could lead to an accident, for example, failure to wear PPE, using equipment in an unsafe manner and horseplay on the job.

Incident - An unplanned event that under slightly different circumstances could have resulted in a loss or injury to people, equipment, property, or production.

Safe Work Practices (SWP) - Generally written methods outlining how to perform a task with minimum risk to people, equipment, materials, environment, and processes.

Task Hazard / Job Safety Analysis (JSA) - A procedure which helps integrate accepted safety and health principles and practices into a particular task or job operation where each step of the task or job is defined, hazards are identified, and appropriate controls are outlined.

## Forms

C&M Electric uses the following forms to record hazard assessment, analysis, and controls:

Site Specific Safety Plan	HA1 A F1
Supervisor Inspection	WI2 A F2
Health and Safety Representative Inspection	WI2 A F3

In addition, C&M Electric uses the Work Task Manual, daily Pre-Site Inspection Hazard Analysis and Job Hazard

Analysis (JHA) for the main tasks undertaken by C&M Electric Workers (New Construction Installation, Demolition and Service).

### **Roles and Responsibilities:**

#### **Senior Management**

- Develop a formal hazard management policy, program and procedure that are reviewed as often as required, at least annually.
- Ensure qualified, competent persons are appointed as supervisors.
- Provide all personal protective equipment or materials required for worker safety.
- Ensure workers are aware of the hazards in the workplace.
- Provide workers with required health and safety training.
- Ensure that emergency response plans are in place.
- Respond to any action items identified by the JHSC / H&S Representative.
- Ensure risk assessments are completed prior to the commencement of work, when equipment, substances or processes are introduced or changed or when a change to the OHSM may impact workplace operations and activities.

#### **Managers / Supervisors**

- Identify all potential hazards and risks to workers in their work areas using the SSSP and Pre-Site Inspection.
- Develop and implement measures to eliminate, reduce, or control the identified risks using the applicable forms.
- Ensure site specific emergency procedures are in place; communicate site specific emergency requirements.
- Conduct Pre-Site Inspection / Job Hazard Analysis daily.
- Deliver Toolbox / Safety Talks on a weekly basis.
- Ensure workers complete site orientation and health and safety training as required.
- Supervise workers to ensure they are following safe work practices and procedures.
- Conduct regular inspections, when required, and keep records of findings.

#### **Workers**

- Follow the safe work practices and procedures that comply with the regulatory requirements.
- Inspect the workplace, equipment, machines, devices, and PPE as required by management and always follow the manufacturer's recommendations.
- Participate in identification of unsafe conditions and practices and report them to the employer and/or committee or representative.
- Work with the supervisor to resolve unsafe conditions and practices.
- Attend worker orientation and health and safety training as required.
- Participate in reviewing Pre-Site Inspection / Job Hazard Analysis.

#### **Operations / H&S Coordinator**

- Assist the team in the identification, evaluation, and control of hazards.

- Ensure those required to participate in assessments are adequately trained on how to perform assessments required by C&M Electric.
- Assist in ensuring that current legislation, regulation, standards, guidelines, industry best practices are considered when conducting hazard and risk assessments.

#### **H&S Representatives and/or JHSC Member**

- Assist management and the supervisor to identify, assess, and control hazards.
- Conduct monthly site inspections, including a report to management identifying action items, if any.
- Monitor the effectiveness of the implemented controls.

#### **Subcontractor**

- Ensure their workers work in compliance with health and safety act and regulation and company policy/program.

#### **Competency**

Hazard assessments including daily PSI's and Supervisor Inspections will be conducted by qualified and competent persons. Only persons who meet the following criteria and training required are deemed competent:

- Certified electrician
- Foreman/Supervisor
- Valid WHIMIS & MOL 4/5 Step

C&M Electric will provide training on hazard identification, and the implementation of controls to mitigate risks.

At the company level, the Safety Team, composed of a member of Senior Management, the Operations/H&S Coordinator, a worker or worker representative and anyone else deemed to be valuable to the process, will conduct risk assessments including Site Specific Safety Plans, Job Hazard Analyses and the Work Task Manual.

At the site level, all hazard assessments are to be conducted by a competent person with the aforementioned criteria and reviewed by all workers on-site.

Workers will be trained, either formally or by a competent person, on all elements of hazard management as they apply to the work being performed and the completion of pre-use inspections. The C&M Electric Safety Team, as a whole, or individuals from within the Safety Team may be involved all elements of the hazard management process, but, when necessary, we may choose to call on the expertise of maintenance personnel, engineers, suppliers, the MLSTD, or independent H&S consultants.

#### **Hazard Reporting**

All workplace parties must accept the shared responsibility of reporting hazards. Failure to report a hazardous condition may result in disciplinary measures being taken, or worse, injury to a co-employee(s).

The identification of hazards may result from pre-start project visits, project pre-planning meetings, workplace inspections or hazards reported by workers. It is essential to the success of C&M Electric that hazards both actual and potential be reported in a timely manner and to appropriate personnel.

Without exception all hazardous conditions must be reported to the Manager/Supervisor, Operations/H&S Coordinator or JHSC Member/H&S Representative. Hazardous conditions include people, equipment and/or



process that could cause injury or damage to equipment.

The following hazardous situations must be reported to the supervisor immediately using the appropriate procedure:

- Supervisors, as part of their mandatory supervisors training, are trained in how to manage identified hazards and that if for any reason they are uncertain on how to proceed, they must stop the work, and contact management immediately.
- Actual and potential hazards.
- Hazards originating outside of the workplace that may pose harm to the health and safety of workplaces where C&M Electric has no control. i.e., a pandemic, natural disaster etc. will be reported to the supervisor or management so that the hazard management process can be initiated.
- Contraventions of the OHSA and its applicable regulations, industry standards and MLSTD guidelines and manufacturer's instructions are considered as hazards and must be reported to the supervisor immediately.
- Hazards must be taken seriously and must be reported to the supervisor immediately.

#### **Hazard Reporting Procedure:**

- Any employee recognizing a hazard is to immediately inform their supervisor. In most circumstances the employee may make a verbal report to a supervisor. Once reported, the supervisor will take the necessary action(s) to correct the hazard. No negative repercussion will be taken against those reporting hazardous conditions or acts.
- The supervisor will notify affected employees through direct or indirect communication on the measures taken to control the hazard. If possible, the supervisor will give direction to correct the hazard in a safe manner. If the supervisor is unable to effectively control/eliminate the hazard, they will take action(s) to protect the employees from the hazard and will report immediately to management for instruction.
- Where the correction of the hazard is beyond the control of the supervisor, the supervisor will contact management for further instruction.
- Management will take all necessary steps to correct the hazard.
- Hazards are to be identified and noted on the site inspection forms.

#### **Hazard Assessment Methodology**

A hazard assessment involves a systemic review of the workplace and all work tasks (including routine and non-routine, and human factors where work is performed) to be conducted with the purpose of identifying existing and potential hazards to the employee and eliminate or control them. This includes hazards originating outside of the workplace that may impact OHS.

When conducting the hazard assessment, the hazard is identified and evaluated based on the likelihood, frequency and severity and given a rating based on the assessment. Hazards are evaluated initially based on the risk ranking without any controls and then evaluated again once the controls have been implemented.

Hazards assessments will be required prior to the commencement of tasks, prior to the introduction, start-up or use of new equipment, material chemical or process, when there is a change to existing equipment, material, chemical or process or when there is a change to the OHSMS that may impact the work operations or activities. Hazard assessments will be reviewed regularly and updated as required. C&M Electric will also consider

ergonomic factors, design, and layout as they may have an impact on the workplace.

1. Identify the hazard.

- The goal of hazard identification is to find and record possible hazards that may be present in the workplace.
- The Work Task Manual, Site Specific Safety Plans (SSSP), Pre-Site Inspection, Job Hazards Analyses are tools used by C&M Electric to identify hazards.
- Formal workplace inspections will be performed on a regular basis. Some hazards may be obvious however they may also be more difficult to identify.
- C&M Electric's List of Applicable Legislation will be considered when identifying hazards.

2. Determine what the most likely outcome would be (consequence).

Consequence	How severely could someone be hurt
5 - Severe	Death or permanent disability to one or more persons.
4 - Major	Hospital admission required.
3 - Moderate	Medical treatment required.
2 - Minor	First Aid required.
1 - Insignificant	Injuries not requiring First Aid.

3. Determine how likely those consequences are based on how often the task is performed (frequency).

Rate of Occurrence	How Likely are Injuries
A - Regular work task	Extremely high risk due to occurrence rate.
B - Performed daily	High risk due to occurrence rate.
C - Performed weekly	Moderate risk due to occurrence.
D - Performed monthly	Moderate risk due to rare occurrence.
E - Rarely performed	Insignificant risk due to rare occurrence.

4. Calculate the risk ranking

Rate of Occurrence	1 Insignificant	2 Minor	3 Moderate	4 Major	5 Severe
A Regular work task	B	A	A	A	A
B Performed daily	B	B	A	A	A
C Performed weekly	C	B	B	A	A
D Performed monthly	C	C	B	B	A
E Rarely performed	C	C	C	B	B

5. Determining appropriate ways to eliminate the hazard or control the risk when the hazard cannot be eliminated.

- Once the risk ranking has been identified, the appropriate controls shall be implemented.
- Any hazard with an A or B rating has the potential to be life-threatening and must have controls in place to ensure the health and safety of workers.
- When implementing controls every effort will be made to use the most effective controls based on the hierarchy of controls – elimination, substitution, engineering, administrative and then PPE.
- When implementing controls, every effort will be made to ensure the control is implemented at the source of the hazard before examining ways to control the hazard along the path or at the worker.

### **C&M Electric Hazard Identification and Management Procedure**

1. A designated team including supervisor and JHSC member, H&S Representative and/or Operations / H&S Coordinator will review our Work Task Manual on an annual basis. The Work Task Manual will identify all critical tasks that have an “A” ranking or have the potential to result in a critical injury or accident onsite.
2. Job Hazard Analyses (JHA) of the main work tasks performed by C&M Electric employees (new construction, demolition, and service) outlines the main hazards and is reviewed regularly to ensure it provides adequate control for workplace hazards.
3. Site Specific Safety Plans (SSSP) will be developed for each workplace or job site in advance of C&M Electric employees going to site.
4. Pre-Site Inspection / Job Hazard Analysis will be conducted daily to ensure that hazard assessments are accurately reflected on site. Any new hazard(s) identified will be added to the Site-Specific Safety Plan and communicated to the team via Toolbox Talk. In addition, all safety investigations will be reviewed by senior management to determine a hazard, if applicable.
5. Weekly site inspections will be conducted by supervisors onsite, as required.
6. Monthly workplace inspections will be completed by the JHSC, as required.
7. New employee orientation and regular training will be provided to assist workers with identifying hazards and having knowledge on reporting observed workplace hazards.

### **Hazard Investigation**

C&M Electric is committed to the investigation of all reported workplace hazard conditions. The investigation process will attempt to determine the cause(s) of hazards such that, once identified, the appropriate corrective action(s) can be taken to prevent recurrence. Any changes to C&M Electric’s policy(s) and/or procedure(s) will be communicated to workers in a timely manner.

It will be the responsibility of supervisors to follow-up on corrective action(s) to ensure they are working effectively and have not created additional hazards. If actions taken have not sufficiently controlled or eliminated the hazard, or perhaps the action taken has created an additional hazard(s), further investigation will be performed by the supervisor.

### **Training**

Senior Management will ensure that affected employees receive adequate training to ensure the effective implementation of this policy. Training on hazard assessment will be provided to employees through safety meetings, one-on-one training or through organized and topic- specific trainings or by any other means when and where necessary.

**Record Keeping**

All documents and records generated by the implementation of this policy, will be kept on file per the Document and Record Control Policy.

**Communication**

This program will be communicated to all workplace parties through safety meetings, orientation or by any other method determined by management.

**Evaluation**

Evaluation of the program will be done on an annual basis by management, the JHSC, workers or the Operations/H&S Coordinator. Evaluations will ensure the policy is compliant with current legislation, industry standards and that the policy is being implemented as required and that it is effective.

# Controls

## Policy Statement

C&M Electric is committed to establishing, implementing, monitoring, and maintaining a documented policy statement and procedure for controlling hazards identified section 2 Hazard Assessments, Analysis and Controls.

Once hazards have been identified and assessed, management will take steps to determine if new controls (see section 2 Hazard Assessments, Analysis and Controls) need to be developed and/or the effectiveness of existing controls.

Priority will be given to attempts that control hazards at the source using engineering controls while ensuring the very last type of control to consider is PPE at the worker.

Wherever possible, C&M Electric will include the implementation of multiple controls to be implemented with a variety of backup controls in place should any one layer of protection fail.

The controls will be developed following the hierarchy of controls, accurately reflect the organization's activities, take into account applicable legal and other requirements such as standards, guidelines or manufacturer instructions.

Once hazard controls have been implemented, they will be monitored to ensure that hazard controls do not inadvertently introduce a subsequent hazard. An example of this would be the introduction of anti-fatigue floor mats that may inadvertently create a slip and trip hazard.

Control measures will be documented, communicated, and made readily available to the affected workplace parties at the point of use as required.

Hazard controls will be evaluated to determine their effectiveness and to assess if the intent of the control is being met. Management will take steps to ensure adequate evaluation methods for new controls prior to the implementation of the control.



**Ken Crawford**  
President, C&M Electric  
January 31, 2023

## Procedure

C&M Electric is committed to ensuring hazards have been adequately identified, assessed, and controlled. Priority will be given to control hazards at the source using engineering controls to ensure that last type of control is at the worker (PPE).

Wherever possible, C&M Electric will include the implementation of multiple controls with a variety of backup controls in place should any one layer of protection fail. The controls will be developed following the hierarchy of controls and will accurately reflect the organization's activities while considering applicable legal and other requirements such as standards, guidelines, or manufacturer instructions.

Once hazard controls have been implemented, they will be monitored to ensure that hazard controls do not inadvertently introduce a subsequent hazard. Control measures will be documented and communicated to workers through training, safety talks, documented policies and procedures or onsite supervision.

## Relevant Definitions:

Hazard - Any agent that can cause harm or damage to humans, property, or the environment. Harm – physical injury or damage to health.

Risk - The probability that exposure to a hazard will lead to a negative consequence.

Risk Assessment - A systematic process of evaluating (ranking) the potential risks that may be involved in a projected activity or undertaking.

Control – A measure taken to reduce the risk to an acceptable or manageable level by reducing either severity, probability, or both.

Unsafe conditions – circumstances, which could allow an accident to occur. For example, might include, defective equipment, unlabeled containers, poor lighting etc.

Hazardous Acts - Unsafe acts and/or behaviour that could lead to an accident, for example, failure to wear PPE, using equipment in an unsafe manner and horseplay on the job.

Incident - An unplanned event that under slightly different circumstances could have resulted in a loss or injury to people, equipment, property, or production.

Safe Work Practices (SWP) - Generally written methods outlining how to perform a task with minimum risk to people, equipment, materials, environment, and processes.

Task Hazard / Job Safety Analysis (JSA) - A procedure which helps integrate accepted safety and health principles and practices into a particular task or job operation where each step of the task or job is defined, hazards are identified, and appropriate controls are outlined.

Safe work practices (SWP) - generally written methods outlining how to perform a task with minimum risk to people, equipment, materials, environment, and processes.

Hierarchy of Controls - A system used to minimize or eliminate exposure to hazards.

Competent Person - A person who, because of knowledge, training, and experience, has the acquired skills to organize specific activities and is familiar with the Occupational Health and Safety Act and applicable Regulations.

Safety Team - The company Safety Team consists of members from Senior Management, the H&S representative or a JHSC worker member where applicable, and the Operations/H&S Coordinator.

## Forms

C&M Electric uses the following forms to record hazard assessment, analysis, and controls:

Site Specific Safety Plan	HA1 A F1
Supervisor Inspection	WI2 A F2
Health and Safety Representative Inspection	WI2 A F3
Fall Protection Rescue Plan	WT2 A F3

In addition, C&M Electric uses the Work Task Manual, daily Pre-Site Inspection Hazard Analysis and Job Hazard Analysis (JHA) for the main tasks undertaken by C&M Electric Workers (New Construction Installation, Demolition and Service).

## Roles and Responsibilities:

### Senior Management

- Promote hazard identification, assessment and control.
- Ensure health and safety controls are developed and implemented to ensure the safety of employees and that all legal and other requirements are met.
- Develop safe work practices and procedures for identified tasks that reflect C&M Electric's scope of work.
- Management has sole responsibility for review and approval of all controls prior to implementation. Management will ensure that an informal review or discussion, including getting input from affected users, is performed prior to approving the new item or change for release. Approve and sign off on all controls.
- Management will ensure that controls are regularly reviewed and updated by a competent person to ensure that the information is current. Prior to release of the final draft the control measures will be approved.
- Ensure controls measures clearly written and readily available and are communicated to all workers through the H&S Policies and Program, Job Hazard Analysis, Site Specific Safety Plan, Toolbox Talks, Work Task Manual, etc.
- Ensure training is provided to workers during new employee orientation and onsite.
- Use a team-based approach when performing hazard assessments. Where appropriate, involve competent workplace parties such as workers, supervisors, maintenance, engineering, and suppliers in the hazard assessment process.

### Supervisor

- Supervisors, at the site level, are required to involve workers in the development of controls, inspections, preventative maintenance, training, emergency response, and incident reporting systems.
- Supervisors are required to communicate control measures to affected workers and must ask if the workers have questions or suggestions involving the control measures.
- Controls developed for specific projects will be approved by the project manager or site supervisor.
- Controls developed on site will be approved by the site supervisor or designated representative.
- Implement and follow all applicable procedures developed to support compliance with any pertinent health and safety regulations as per management.

- Ensure all applicable hazard assessments, analyses and control requirements are met as per company health and safety programs.
- Recognize hazards and implement corrective measures to eliminate or control the identified hazard.
- Communicate actual and potential hazards onsite and respective control measures. Provide workers an opportunity to provide input, ask questions or give suggestions.
- Ensure safe work practices are followed.
- Ensure that all parties involved are adequately trained in their roles and responsibilities.

#### **Workers**

- Workers will be provided an opportunity to make comments or suggestions with the establishment and maintenance of Controls.
- Participate in hazard assessments and follow all health and safety training.
- Use all appropriate engineering controls, administrative controls, and PPE provided.
- Follow all applicable safety procedures for each work task.
- Work in accordance with our Health and Safety Program, the Occupational Health and Safety Act and applicable Regulations, and industry standards.
- Only perform a work task if you are competent to do so.
- Participate in Health and Safety training and safety meetings/talks.
- Ask about operating instructions, safe work procedures, processes, etc. Where applicable, refer to owner's manuals and always follow manufacturer's instructions.
- Pay attention to signs and other warnings in your work
- Consult the health and safety bulletin board and/or on-site safety binder regularly.

#### **Operations/H&S Coordinator**

- Assist in the identification, evaluation, and control of hazards.
- Ensure workers are aware of and trained on control procedures.
- May assist with finding additional expertise in the development and implementation of controls.

#### **H&S Representatives and/or JHSC**

- Health and safety representatives and/or members of the JHSC will be consulted in the establishment and maintenance of Controls.
- Make recommendations concerning this policy.

#### **Subcontractor**

- Ensure subcontractor workers comply with this policy at all times.

#### **Establishing Controls**

Controls will be established with the sole purpose of eliminating or controlling identified hazards starting with those of the highest risk. This will be accomplished using C&M Electric's *Four "C"s Approach to Safety* methodology.

- C - Consistent and aligned with our OHS Objectives of the protection of our workers and the



prevention of accidents and incidents.

- C - Complete, meaning that procedures are: 1) developed, 2) implemented, 3) maintained and 4) monitored.
- C - Comprehensive to include 1) all people and positions, 2) all equipment, tools machinery, and substances 3) all materials 4) all work environments and 4) all work tasks.
- C - Continuous which requires regular review/evaluation/auditing of all comprehensive aspects of our organization, which may result in 1) making revisions where necessary, 2) adding to our OHS program in the event of changes to scope of work or the addition of a new work position etc., 3) ensure adequate communication and training.

### **C&M Electric Hazard Control Procedure**

1. A designated team including supervisor and JHSC member, H&S Representative and/or Operations / H&S Coordinator will review our Work Task Manual and Job Hazard Analyses on an annual basis to ensure identified controls are effective. Recommendations will be made to Management if required.
2. Site Specific Safety Plans (SSSP) will be developed for each workplace or job site in advance of C&M Electric employees going to site to identify site level hazards and respectable controls.
3. Pre-Site Inspection / Job Hazard Analysis with controls will be completed by the foreman or site supervisor daily to identify the daily hazards to which the workers will be exposed and the necessary controls.
4. Supervisors will conduct weekly site inspections onsite, as required, to evaluate controls use and effectiveness.
5. Monthly workplace inspections will be completed by the JHSC, as required, to evaluate hazard controls use and effectiveness.
6. New employee orientation and regular training will be provided to assist workers in evaluating implemented controls.
7. Supervisors will supervise workers onsite to ensure they are following the predetermined controls and if workers are identified working unsafely the supervisor may initiate the progressive discipline policy.

### **Hierarchy of Controls**

The Hierarchy of hazard control is a system used to minimize or eliminate exposure to hazards. When considering how to reduce the risk, C&M Electric will consider the most effective control methods at the source before considering at the control methods along the path or at the worker, such as PPE.

The hierarchy of controls as it relates to the electrical industry is as follows:

- Elimination
  - Physically remove the hazard, such as by de-energizing all equipment.
- Substitution
  - Replace higher risks with lower risks, such as replacing 347V with 120V.
- Engineering controls
  - Reinvent ways to control electrical energy, such as remote operation.
- Administrative Controls
  - Change the way people work, such as through training, Lock Out / Tag Out Procedure, Policies and Procedures
- Personal Protective Equipment (PPE)
  - Reducing risk for workers working on electrical with Personal Protective Equipment (PPE).

Controls are listed in order of effectiveness however all controls will be considered. Controls often work best in combination.

### **Priority of Control Principles**

When implementing controls, every effort will be made to comply with the controls hierarchy below with #1 being the most desirable and #3 the least desirable:

1. At the source of the hazard – elimination, substitution, engineering
2. Along the path - between the source and the worker – isolation, administrative
3. At the worker – PPE

### **Legal and Other Requirements**

When developing controls, C&M Electric will ensure that applicable legal and other requirements such as standards, guidelines or manufacturer's instructions are met. This will be achieved by referencing the OSHA and its applicable regulations, industry standards, manufacturer's instructions, MLSTD guidelines etc.

### **Readily Available**

It is essential that workers have access to hazard assessment results and control measures. As all sites are equipped with a site tablet, all workplace parties will have access to control measures as the Health & Safety Program, Work Task Manual, Pre-Site Inspections and Site-Specific Safety Plans are stored in eCompliance and on C&M Electric's website. The H&S Coordinator will also provide hard copies to site for the Foreman to post on the H&S Board or Binder. In addition, workers will be given site-specific instruction, orientation, and supervision.

### **Monitoring/Reviewing Controls**

Once hazard controls have been implemented, they will be evaluated to determine their effectiveness and to assess if the intent of the control is being met. C&M Electric will ensure that hazard control recommendations do not inadvertently introduce a subsequent hazard while taking steps to eliminate, reduce or control another. Regular feedback from all workers as well as findings from site inspection and/or incident reports or near miss reports will provide valuable information where root cause analysis will be completed. In the event of an incident, management will review relevant safe work procedures and make any required changes which will then be communicated to workers through Toolbox Talks. Furthermore, an annual review of the safe work procedures included in the Work Task Manual will be reviewed by both workers and management at the Annual Health & Safety meeting.

### **Evaluating Controls**

During an evaluation, members can determine the effectiveness of controls by:

- Interviewing workers affected by the control.
- Monitoring site and conducting regular inspections.
- Observations and supervision of workers onsite.
- Reviewing accident and incident reports.
- Management will take steps to ensure adequate evaluation methods for new controls prior to the implementation of the control.

Management will consider:

- How will the control be implemented?
- What is the schedule for implementation and is it based on the hierarchy of controls?
- What is the feedback from supervisors and workers?
- What is an acceptable result?

- Have we considered an alternative control if this one does not work?

### **Training**

Senior Management will ensure that affected employees receive adequate training to ensure the effective implementation of this policy. Training on controls will be provided to employees through safety meetings, one-on-one training or through organized and topic-specific trainings or by any other means when and where necessary. The principles of the Hierarchy of Controls will be explained to workers during H&S training and orientation sessions. Senior Management, project managers, the Operations/H&S coordinator, and supervisors will be trained in the principles of the Hierarchy of Controls as part of C&M Electric's mandatory Basics of Supervising course. The level of training will be such that participants will be able to understand and apply the principles. Documentation of training will be kept in compliance with the C&M Electric's Training Policy and Procedures.

### **Record Keeping**

All documents and records generated by the implementation of this policy, will be kept on file as per the procedure outlined in the Document and Record Control.

### **Communication**

Communication is one of the fundamental keys to the success of C&M Electric's OHSMS. Senior Management is committed to ensuring workers are knowledgeable about, trained in and kept current with changes to developed control measures. Workers will be informed of control measures onsite or in-class training, safety talks, one-on-one discussions or by any other means deemed effective by management.

### **Evaluation**

The program will be updated at least annually by management, and if necessary, after investigations, when the phase of a project changes, or to meet any new legislation or regulation.

# Procurement and Contractor Management

## Policy Statement

C&M Electric is committed to establishing, implementing, monitoring, and maintaining a documented policy statement and procedure for procurement and contractor management/outsourcing.

The procedure requires:

- Hazard assessment, analysis, and control for procured goods and services following the methodology outlined in the C&M Electric Hazard Management and Controls Policies and Procedures.
- OHS criteria for selecting, monitoring, and evaluating contractor/service providers. The criteria will include evidence that the subcontractor has:
  - The ability and competency of the contractor to be able to assess, analyze and control hazards arising from their own work that may impact the C&M Electric's workers.
  - The ability and competency of the contractor to be able to assess, analyze and control hazards arising from C&M Electric's work that may impact the contractor's workers.
  - Effective methods of communicating with their workplace parties when there are changes affecting the health and safety of the work.
- The subcontractor must acknowledge that C&M Electric's designated supervisor is the lead in the coordination and integration of relevant portions of the C&M Electric's OHSMS on multi-employer or multi-contractor worksites.

Contractors will be held accountable for executing on-site safety practices for the protection of their own employees, other subcontractors, and workers from C&M Electric in accordance with all applicable local, provincial, and federal regulations and the policies of C&M Electric. All work performed will be in full compliance with the requirements of the Occupational Health and Safety Act.



**Ken Crawford**  
President, C&M Electric  
January 31, 2023

## Procedure

C&M Electric is committed to establishing, implementing, monitoring, and maintaining a procedure for procurement and contractor management/outsourcing.

The procedure follows the hazard identification, assessment and control methodology outlined in the C&M Electric Hazard Management and Controls Policies and Procedures.

C&M Electric's established criteria for selecting, monitoring, and evaluating contractor/service providers will include evidence that the subcontractor has:

- The ability and competency of the contractor to be able to assess, analyze and control hazards arising from their work that may affect their own employees, other subcontractors, or workers from C&M Electric.
- Effective methods of communicating with their workplace parties when there are changes affecting the health and safety of the work.

The subcontractor must acknowledge that C&M Electric is the H&S lead and will follow any and all requirements outlined by C&M Electric when working under contract.

Contractors will be held accountable for executing on-site safety practices for the protection of their employees and the employees of subcontractors in accordance with all applicable local, provincial, and federal regulations and the policies of C&M Electric. All work performed will be in full compliance with the requirements of the Occupational Health and Safety Act and the applicable Regulations.

This procedure is applicable to all subcontractors of C&M Electric to ensure that all parties share health and safety responsibilities including applicable legislation, industry standards and guidelines and C&M Electric's H&S program.

## Relevant Definitions

Subcontractor Agreement - An agreement to define the health and safety expectations to be followed by a subcontractor and its employees. The subcontractor ensures that all work will be performed in accordance with C&M Electric's Health and Safety Policies and Programs.

Subcontractor Checklist – A document used to track subcontractor submittals to ensure they have provided all required documentation in advance of beginning work.

Approved Subcontractors - Subcontractor who has met all health and safety criteria required by the company.

Procurement - The process of finding and agreeing to terms, and acquiring goods, services, or works from an external source, often via a tendering or competitive bidding process.

Competent Person - A person who, because of knowledge, training, and experience, has the acquired skills to organize specific activities and is familiar with the Occupational Health and Safety Act and applicable Regulations.

## Forms

C&M Electric uses the following forms for Procurement and Contractor Management:

Subcontractor Agreement	PC2 A F
Subcontractor Management Package	PC1 A F
Site Specific Orientation Checklist	TRA2 A F4

## **Responsibilities**

### **Senior Management**

- Require that all subcontractors provide the required documents and sign the Subcontractor Agreement.
- Ensure that this procedure is implemented and adhered to at all C&M Electric workplaces.
- Ensure that the resources and training have been provided to personnel to do the work safely.
- Ensure that the contractor selection process is reviewed regularly to ensure its quality.
- Conduct a post contract evaluation of the subcontractor performance. Should a subcontractor receive a poor rating, management will communicate with the contractor company to determine if the contractor will be used again.
- Communicate with subcontractors, prior to construction to review safety submittals and clarify expectations.
- Ensure the subcontractor is aware that they must inform C&M Electric of any and all subcontractors to be used by the subcontractor throughout the duration of the project.

### **Supervisor**

- Provide C&M Electric's Site-Specific Safety Plan (SSSP), C&M Electric's H&S program and any other relevant H&S documentation to subcontractor.
- Periodically observe contractors performing work at jobsites to ensure work is complying with regulatory and C&M Electric health and safety requirements.
- Correct or notify the appropriate parties of any unsafe behaviors and/or conditions created by the contractors and initiate the subcontractor discipline policy if required.

### **Subcontractor**

The H&S Coordinator will be notified by the Project Manager when a subcontractor is required for a specific project. Prior to site mobilization, the H&S Coordinator will request all subcontractors to complete the Subcontractor Management Package which requires the subcontractor to provide the following documentation:

- ✓ Current clearance certificate from the applicable worker compensation board.
- ✓ Valid general commercial liability insurance certificate, listing C&M Electric as a certificate holder. The contractor must have adequate coverage per occurrence of public and property liability insurance to satisfy C&M Electric.
- ✓ Safety data sheets (SDS) for all WHMIS products used on the project.
- ✓ Copy of Form 1000 Registration of Constructors and Employers Engaged in Construction.
- ✓ A copy of their company Health and Safety Policy and Program.
- ✓ Copies of worker training and qualification records.
- ✓ A site-specific safety plan including a hazard assessment specific to the work and location.
- ✓ Signed copy of subcontractor agreement.
- Attend site specific orientation or training as required by the client or constructor.
- Ensure their workers work safely in compliance with the Occupational Health and Safety Act and applicable regulations, industry standards and the C&M Electric's Health and Safety Policy and Procedures.
- Ensure machinery and equipment are safe and workers work in compliance with safe work procedures.

- Ensure their workers receive adequate training in their specific work tasks to protect their own health and safety.
- Ensure their workers are instructed in the application and use of C&M Electric Health and Safety Policy and Procedures.
- Perform regular health and safety inspections, as required.
- Assess the workplace, equipment, and employees under their direction and, when necessary, implement controls for the elimination or control of hazards.
- Ensure that the work they are performing does not pose a threat to others working on the site.
- Report, immediately, any incidents, accidents or near misses to C&M Electric management.
- Clean up their respective debris on a regular basis or as necessary.
- Keep all access/egress emergency exits clear of any debris, material(s) and or equipment at all times.
- Follow all site level health and safety requirements as outlined by the client or constructor.
- Stop work, conducted in an unsafe manner or during unsafe conditions, which may present a risk to people, property, or the environment.

#### **Workers**

- Work cooperatively with subcontractors and their workers.
- Follow all company policies and procedures, legislation and regulations and onsite H&S requirements.
- Report any observed H&S infractions or any incidents/accidents to the C&M Electric supervisor onsite.

#### **Operations/H&S Coordinator**

- Assist Senior Management with the implementation of this Policy and Procedure by verifying contractor submittals and documentation.

#### **H&S Representatives and/or JHSC**

- Be consulted on and make recommendations concerning this Policy and Procedure.

#### **Procedure**

When selecting a subcontractor, the subcontractor must demonstrate their ability to identify hazards and control risks arising from their work. The subcontractor must further be competent in conducting hazard assessments specific to their scope of work. The subcontractor must consider workplace factors such as people, equipment, material, the environment, and work processes in their hazard assessment.

#### **Selection Process**

Subcontractors are required seldomly at C&M Electric however, if a subcontractor is required for a project they are selected based on their ability and competency. Furthermore, the subcontractor must demonstrate that they will comply with the Occupational Health and Safety Act and applicable regulations through the submission of the Subcontractor Management Package. Subcontractors are then monitored and evaluated using C&M Electric's Subcontractor H&S Evaluation. Once completed, this evaluation will be considered when selecting subcontractors for future projects. If a sub-trade doesn't have the capacity to run a H&S Management system, they are adopted under C&M Electric's system.

### **Multiple Subcontractors**

Multi-employer construction projects require a higher level of managing people, machines, and materials for the sake of efficiency and safety, therefore communication and coordination is essential. There must be one body responsible for the coordination of work and the communication of relevant information for the purpose of ensuring health and safety on the worksite.

When C&M Electric is acting as the constructor/general contractor working with multiple subcontractors, the C&M H&S Coordinator will have sole responsibility for the coordination and communication of information for the purpose of ensuring health and safety on the worksite.

When C&M Electric is hiring a subcontractor to work on the site of another constructor/general contractor, all constructor requirements will be followed in addition to the C&M Electric subcontractor procedure. If the general contractor requires further documentation than C&M Electric's requirements, the Subcontractor Management Package will be modified. The H&S Coordinator will compile all subcontractor requirements, distribute to the required employer levels and file in accordance with the procedures outlined in Document and Record Control.

### **Training**

Senior Management will ensure that affected employees receive adequate training to ensure the effective implementation of this policy. Training may be formal or informal and will be delivered either one-on-one through courses provided by a competent worker or designated representative.

### **Record Keeping**

All documents and records generated by the implementation of this policy, will be kept on file as per the procedure outlined in the Document and Record Control.

### **Communication**

The site orientation, toolbox talks, and site inspections will be used to communicate on-site health and safety issues and to raise health and safety issues with contractor's and their workers. Wherever possible, a designated contact for the subcontractor and C&M Electric will be appointed to allow for appropriate information to be communicated in a timely and consistent manner. Regular communication between site supervisors and management as well as workers onsite is required to ensure all required H&S information is being shared. Post contract the management of C&M Electric will evaluate the subcontractor and communicate any H&S concerns. This program will be communicated to all workplace parties through safety meetings, orientation or by any other method determined by management.

### **Evaluation**

This policy will be evaluated at least annually by management to ensure it is being fully implemented and effective. Any changes to the policy will be communicated to the appropriate parties.



# Company Rules

## Policy Statement

C&M Electric is committed to establishing, implementing, monitoring, and maintaining a documented policy statement and procedure for company rules.

Rules establish expectations and provide guidelines within which to conduct daily work. They also regulate compliance with legislation that govern our business operation.

The procedure will require:

- Roles and responsibilities for setting, implementing, and complying with company rules be developed and communicated.
- Company rules to be written and either visibly posted or provided to each employee.
- Company rules be clearly explained to workers through worker orientation.
- A progressive disciplinary procedure be developed and implemented.
- Company rules be applied and consistently enforced throughout the organization.
- All employees will be expected to act in a manner consistent with this policy and procedures.

Failure to comply with company rules may result in disciplinary action being taken following the C&M Electric's progressive disciplinary process. A worker found in a position of non-compliance will be disciplined in a manner as outlined in this policy.

Management reserves the right to circumvent the disciplinary process when deemed necessary.

All workplace parties to include management, supervisors, workers, and subcontractors must work in compliance with this policy. Disciplinary action will be taken consistently with all parties.



**Ken Crawford**  
President, C&M Electric  
January 31, 2023

## **Procedure**

All employees have certain responsibilities to both C&M Electric and fellow employees. Rules establish expectations and provide guidelines within which to conduct daily work. They also regulate compliance with legislation that govern our business operations. Failure to comply with company rules may result in disciplinary action being taken. All workplace parties to include management, supervisors, workers, and subcontractors must work in compliance with this policy. Disciplinary action will be taken consistently with all parties.

## **Purpose**

The purpose of this policy is to ensure that all workplace parties understand the expectations of C&M Electric concerning how our workers behave while performing work.

## **Relevant Definitions**

Rules - One of a set of explicit or understood regulations or principles governing conduct within a particular activity or sphere.

Enforcement - The act of compelling observance of or compliance with a law, rule, or obligation.

Progressive discipline - The process of taking progressively stricter action when an employee fails to correct a problem in their performance or behavior after being given reasonable time to do so.

Internal Responsibility System (IRS) - A system that exists within an organization, IRS requires that every individual working for an organization has direct responsibility for health and safety as an essential part of their job.

## **Responsibilities**

### **Senior Management**

- Ensure workers have the tools and resources to work safely.
- Review all applicable policies and procedures regularly.
- Ensure this policy is fully communicated to all workers.

### **Supervisors**

- Communicate the site-specific safety rules to all workers onsite.
- Continually supervise staff to ensure compliance and, when required, initiate the progressive disciplinary policy

### **H&S Coordinator**

- Ensure the most current version of Company Rules are posted in the workplace and on eCompliance.
- Ensure workers understanding of the company rules by overseeing the Acknowledgment and Agreement form.

### **Workers**

- Understand and follow C&M Electric's safety rules.

### **Subcontractors**

- Ensure subcontractor workers work in compliance with company rules and C&M Electric policies.

## **General Safety Rules**

- C&M Electric's Health and Safety Policy and programs are to be followed at all times. Company and site-specific safety rules will be strictly adhered to at all times. Site Specific rules and procedures, as defined by the supervisor or Constructor, will be strictly adhered to.
- Use any protective equipment, devices or tools required for the job.
- Operators of company vehicles/equipment shall have a valid and relevant drivers/operator's license.

- Consumption of alcohol, marijuana and/or any mind-altering substances during working hours, breaks, and at lunchtime is not permitted. Likewise, reporting to work while under the influence is not permitted.
- Appropriate personal protective equipment/apparel must be always worn as directed.
- Use proper lifting techniques when manual material handling is required.
- Obey all rules, signs, and instructions.
- Report immediately any condition or practice which may pose a risk to people, equipment, property, materials, or the facility to a C&M Electric supervisor.
- Electrical equipment or circuits are to be handled only by qualified and authorized personnel.
- Do not operate any piece of equipment, forklift truck unless assigned by your immediate supervisor and with the appropriate training or certification.
- Do not remove “danger” or “lock out” tags placed on machinery or equipment.
- Safety devices on equipment must not be removed or made inoperative.
- Lockout tagout procedures must be followed.
- Any incidents, accidents or near misses must be immediately reported to a C&M Electric supervisor.
- All defective tools or equipment are to be reported directly to the supervisor. Do not attempt to repair any machinery, electrical equipment or wiring requiring a qualified and authorized person.
- Using compressed air for blowing dust from clothing is forbidden. Never direct a stream of compressed air toward your own body or that of another person.
- Machine tools must be attended while they are in operation. An operator should not be distracted while his machine is running.
- “Rough House” or “Horse Play” will not be tolerated.
- Check equipment prior to use for unsafe conditions; always follow manufacturer operating manual.
- All flammable liquids and acids must be kept in safe containers and properly identified.
- Materials, parts, tools, oil, grease, or other articles must not be left wherever they may cause a tripping or slipping hazard to any person.
- Protect yourself and fellow employees through proper housekeeping onsite.
- Do not operate machinery unless all guards are in place.
- Stay clear of overhead loads.
- A signaler is required for all reversing vehicles or when working near overhead power lines.
- If in doubt, stop and ask questions.

### **Site Specific Safety Rules**

Any site-specific safety rules that must be followed will be communicated through the site orientation and Site-Specific Safety Plan (SSSP).

### **Consistency**

The implementation of eCompliance will allow the H&S Coordinator to post and make available the most current version of the Company Rules for all employees to access. Furthermore, the H&S Coordinator will ensure that all SSSP's include the most current version of the Company Rules to be posted on the H&S Board or Binder.

Consistent application and enforcement of company rules is the responsibility of Senior Management, Project Managers, the Operations/H&S Coordinator, or their delegate, and supervisors. The consequences of applying company rules inconsistently can jeopardize the success of our OHSMS and result in worker complaints about being treated unfairly and may result in injuries.

### **Comprehension**

There are two methods used to validate workers understanding of the company rules. Firstly, all new employees completing

the New Worker Orientation must complete the Acknowledgement and Agreement form which requires workers to sign-off that they know the company rules. Secondly, the company rules are included in the Site-Specific Safety Plan which all employees must review prior to commencing work at a new site.

### **Progressive Disciplinary Policy**

All workplace parties to include management, supervisors, workers, and subcontractors must work in compliance with this policy. Disciplinary action will be taken consistently with all parties. C&M Electric uses a progressive disciplinary policy. A worker found in a position of non-compliance will be disciplined in a manner as outlined below.

- Verbal Warning will be given when the safety infraction is minor in nature and does not endanger the welfare of the worker or others.
- Written warning will be given for a serious infraction that directly endangered the worker and/or others or when contravention is minor, but the worker failed to respond to verbal warnings. Documentation will be provided to the worker and filed in the worker's personnel file. The worker may be instructed to participate in a training course to refresh the worker as to expected behaviours.
- Written Warning and Instruction to Leave Worksite will be given when the infraction is serious in nature and would likely endanger the worker or another person(s) or when in contravention of a minor infraction but has not responded to previous written warnings. Any worker instructed to leave the worksite, will leave the jobsite immediately and will not be permitted to return to work until their return is authorized by upper management. At the discretion of management, the worker will either be suspended for a fixed period or the worker's employment may be terminated.

C&M Electric Senior Management reserves the right to issue any level of disciplinary action that it feels is appropriate for any infraction of any legislated requirement or our health and safety program. Each case of inconsistency will be handled on a case-by-case basis.

Disciplinary action can take many forms such as, an interview with Senior Management, re-training, probation, working under direct supervision, suspension, or termination.

Supervisors are expected to ensure that company rules are followed on any project for which they are responsible. Supervisors, have the right to ask a worker to leave sight, but they do not have the right to terminate an employee.

Any worker who is issued a ticket for violation by a Ministry of Labour, Training and Skills Development Inspector is subject to disciplinary action taken against them by our organization which may include suspension without pay or termination of employment.

### **Right to Refuse Unsafe Work**

An employee may refuse work if they believe that that machine, equipment, or tool is likely to endanger them, the physical condition of the workplace is likely to endanger them, there is a violation of the Act or Regulations, or the worker has a reasonable expectation that the work could place them in danger.

In the event that a worker exercises their Right to Refuse, the supervisor will be immediately notified, and the situation will be fully investigated. Should any dispute arise post investigation, the worker and supervisor may engage the Joint Health and Safety Committee or Health and Safety Representative or Ministry of Labour, Training and Skills Development.

### **Visitor Safety Rules**

In the event that a visitor will be onsite, C&M Electric will ensure the site-specific hazards have been communicated and that the visitor has sufficient supervisor or oversight will onsite. Visitors are only able to visit areas that are low risk and

must follow all onsite requirements regarding PPE, emergency evacuation and training.

### **Workplace Impairment Rules**

All individuals working at or for C&M Electric (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, marijuana, illicit drugs, non-prescription drugs, prescribed medications, or any other substance that may impair judgment or performance.

C&M Electric has taken the position that the presence of illicit drugs, recreational drugs and/or alcohol on the worksite is not permitted. Any individual failing to adhere to this policy will be subject to discipline up to and including dismissal. Managers and supervisors are to identify and handle all situations promptly where there are concerns about an individual's ability to perform their job safely due to impairment. Employees who are assessed and suspected of being impaired while at work will be sent home immediately, sufficient transportation will be arranged. Any incidence of suspected impairment will be fully documented and filed in the employee's records. Employees are encouraged to inform their supervisors, foreperson or management about any situation that may compromise their safety or the safety of others or impair their performance. If an employee has a legitimate reason to use a mind-alerting substance (i.e., a prescription), they are required to communicate this to their supervisor, and this will be addressed on a case-by-case basis.

### **Company Rules Regarding Electrical Equipment**

All electrical wiring and equipment shall be a type listed by a nationally recognized testing laboratory for the specific application for which it is to be used. All electrical work shall comply with applicable safety codes. All work shall be performed by qualified personnel familiar with applicable code requirements.

Isolation: Before work is begun, the person in charge shall determine if any part of an electric power circuit (exposed or concealed) is in such that the performance of work could bring any person, tool, or machine into physical or electrical contact with it. Whenever possible, all equipment and circuits to be worked on shall be deenergized before work is started and personnel protected by clearance procedures and grounding. Live parts of wiring or equipment shall be guarded to protect all persons or objects from harm. Transformer banks and high voltage equipment shall be protected from unauthorized access.

Extension Cords, Electrical Wire and Flexible Cord: Extension cords, electric wires and flexible cords passing through work areas shall be protected from damage (including that caused by foot traffic, vehicles, sharp corners, protections, and pinching). Flexible cords and cables passing through holes shall be protected by bushings or fittings. Patched, oil-soaked, worn, or frayed electric cords or cables shall not be used. Extension cords or cables shall not be secured with staples, hung from nails, or suspended by bare wire.

Live Electrical work: Live electrical work must be avoided if at all possible. The only type of live electrical work that should be conducted is testing or diagnostic in nature. However, if it is necessary to work on energized lines or equipment, applicable personal protective equipment must be worn. Live electrical work must be done under the supervision of a safety watcher who is trained, qualified and competent. The safety watcher must also be a certified first aider who can initiate the emergency response plan if required. Insulation mats or platforms of substantial construction and providing good footing shall be placed on floors and on the frames of equipment having exposed live parts so that the operator or persons in the vicinity cannot touch such parts unless standing on the mats, platforms, or insulated floors. Suitable barriers or other means shall be provided to ensure that workspace for electrical equipment cannot be used as a passageway when energized parts of electrical equipment are exposed.

Ground Fault Circuit Interrupters: All receptacle outlets that provide temporary electrical power during construction, remodeling, maintenance, repair, or demolition, shall have ground-fault circuit-interrupter (GFCI) protection for

personnel. GFCI protection shall be provided on all circuits serving portable electric hand tools or semi-portable electric power tools (such as block/brick saws, table saws, air compressors, welding machines, and drill presses).

Temporary Wiring and Lighting: Bulbs attached to temporary lighting strings and extension cords shall be protected by guards unless the bulbs are deeply recessed in a reflector. Temporary lights shall not be suspended by their electric wire unless cord and lights are designed for this suspension. Exposed empty light sockets and broken bulbs shall not be permitted. Portable electric lighting used in confined wet and/or other conductive locations as for example, drums. Tanks and vessels shall be operated at 12 volts or less. Temporary lighting circuits shall be separate from electric tool circuits. Receptacle circuits shall be dedicated to either temporary lighting or electric tools.

Testing: Temporary electrical distribution systems and devices shall be checked and found acceptable for polarity, ground continuity, and ground resistance before initial use and before use after modification.

Wet locations: Where a receptacle is used in a wet location it shall contained in a weatherproof enclosure, the integrity of which is not affected when an attachment plug is inserted. All temporary lighting strings in outdoor or wet locations (such as tunnels, culverts, valve pits, floating plant, etc.) consist of lamp sockets and connection plugs permanently molded to the hard service cord insulation.

Operations Adjacent to Overhead Lines: Overhead transmission and distribution lines shall be carried on towers and poles, which provide safe clearances over roadways or structures. Clearances shall be adequate for the movement of vehicles and for the operation of construction equipment. Work activity that could affect or be affected by overhead lines shall not be initiated until coordinated with the appropriate utility officials.

Hazardous Locations: Locations of electrical equipment and wiring shall be classified on the properties of the flammable vapors, liquids or gases, or combustible dusts or fibers which may be present therein and the likelihood that a flammable or combustible concentration or quantity is present. When classifying locations, each room, section, or area shall be classified on an individual basis. All equipment, wiring methods, and installations of equipment in hazardous (classified) locations shall be approved as intrinsically safe, approved for the hazardous location, or demonstrated to be safe for the location. Equipment and wiring approved for the hazardous (classified) location shall be approved not only for the class of location but also for the ignitable or combustion properties of the specific gas, vapor, dust, or fiber that will be present. This equipment shall not be used unless it is marked to show the class, group, and operating temperature or temperature range for which it is approved.

Underground Electrical Installation: Warning signs and rigid barricades shall be promptly placed when covers of manholes, hand holes, or vaults are removed. When an employee enters an underground opening the opening shall be protected with a barricade, temporary cover, or other guard appropriate for the hazard. Underground opening guards and warning signs shall be lighted at night. Maintenance holes and un-vented vaults shall be treated as, and subjected to the requirements of, confined spaces. Smoking shall be prohibited in maintenance holes and vaults. When open flames must be used in manholes, extra precautions shall be taken to provide ventilation. Before using open flames in maintenance holes or vaults, the holes/vaults shall be tested and found safe or cleared of any combustible gases or liquids. Before cutting into a cable or opening a splice, the cable shall be identified and verified to be the proper cable and de-energized.

Work in Energized Substances: When working in an energized substation, authorization shall be obtained from the designated person before work is begun. When work is to be done in an energized substation, the following shall be determined; what facilities are energized, and what protective equipment and precautions are necessary for the safety of personnel. Extraordinary caution shall be exercised in the handling bus bars, tower steel, materials, and equipment near energized facilities. Work on or adjacent to energized control panels shall be performed by qualified employees. Precautions shall be taken to prevent operation of relays or other protective devices due to jarring, vibration, or improper

wiring.

Use of vehicles, gin poles, and other equipment in unguarded high voltage equipment: Areas shall at all-time be controlled by qualified employees. When a substation fence must be expanded or removed, a temporary fence affording similar protection, when the site is unattended, shall be provided. Adequate interconnection with ground shall be maintained between temporary fence and permanent fence. All gates to all unattended substations shall be locked except when work is in progress.

#### **Company Rules regarding Lockout Tagout**

Equipment or circuits that are deenergized shall be rendered inoperative and have tags attached at all points where such equipment or circuits can be energized. Lockout procedures are designed to prevent the inadvertent starting of machinery, equipment, or the release of hazardous energy sources during maintenance, repair work, installation or tear out. All hazardous energy must be secured, locked out and tagged by a qualified, authorized employee before any work commences.

#### **Relevant Definitions**

Hazardous Energy - Any energy source (electric, compressed gas or steam, water, chemical, hydraulic tensioned spring, mechanical or elevated object or part) that could release or move and injure or endanger a worker.

Energy Isolating Device - The devices controlling the supply of energy to the machinery, tool or equipment and includes, but is not limited to, switches, circuit breakers, valves, Blind Flanges, and clutches. In the case of electrical controls, it means the device controlling the flow of current to the branch circuit that supplied the power to the machinery or Equipment. Individual control buttons or switches in control circuits are excluded. In the case of piping systems, a valve is considered a control device unless the work to be done is in a confined space or an enclosed space, in which case blanking or blinding is required.

Maintenance - Means all work done to keep a machine, process or system in efficient operating condition and includes repairing, servicing, adjusting, changing, cleaning, lubricating and the cleaning of obstructions to the normal flow of material. Lockout - The use of locks to positively secure the control device used to control the hazardous energy or other hazard.

Lockout Procedures - The methods by which energy sources are isolated, locked out and tested for effective protection.

Hazardous Energy - Any energy source (electric, compressed gas or steam, water, chemical, hydraulic tensioned spring, mechanical or elevated object or part) that could release or move and injure or endanger a worker.

Energy Isolating Device - The devices controlling the supply of energy to the machinery, tool or equipment and includes, but is not limited to, switches, circuit breakers, valves, Blind Flanges, and clutches. In the case of electrical controls, it means the device controlling the flow of current to the branch circuit that supplied the power to the machinery or Equipment. Individual control buttons or switches in control circuits are excluded. In the case of piping systems, a valve is considered a control device unless the work to be done is in a confined space or an enclosed space, in which case blanking or blinding is required.

Assigned Lock - Is a lock to which the worker personally controls the key.

Zero Energy State - Is the point at which machinery or equipment has no energy flowing to or from it and as a result, does not have the potential to cause accidental physical harm or injury if handled in this state.

Lockout Requirements: Lockout requirements (Zero energy Isolation) come into effect when a system or piece of equipment represents a potential hazard to life and property, and applies to all energy sources, i.e., compressed air, water, hydraulics, steam, gravity, electricity, pipelines, and vessels. The following procedure sets out the necessary action to be taken to lockout in a safe manner. These requirements are intended to supplement not replace the regulations set out by the regulatory bodies. When circumstances require the application of lockout procedures, the isolating device shall be secured in the inoperative position using scissors and locks. Such locks shall be marked and tagged to identify the person applying them. Locks issued to an individual employee shall be operable only by that employee's key and by a master key



for emergency use which is held by the supervisor. COMBINATION LOCKS SHALL NOT BE USED AT ANY TIME.

It is imperative that all employees using the lockout system have locks suitably identified which indicate the individual's name. This is necessary should the need arise to have the lock removed. Employees must not borrow or lend locks. Safe lockout and isolation of equipment is required to protect you, the employee, and your coworkers from personal injury.

Lockout Procedures: The lockout procedure is as follows:

- No person will work on any equipment that represents a safety hazard unless that equipment is properly locked-out.
- The supervisor / designate will determine what equipment needs to be locked-out and will inform area employees regarding the lockout before any work is started.
- The designated employee will physically isolate the equipment.
- Stop all drives and motors on the machine by means of the stop button.
- Where the machine utilizes a PLUG, disconnect the plug, the plug should be secured by a lock.
- If the lockout is by means of a local disconnect, the following shall apply; DO NOT OPEN A DISCONNECT WHILE UNDER LOAD:
  - STEP 1 Remove as much load as possible before opening.
  - STEP 2 Wear appropriate personal protective equipment (PPE).
  - STEP 3 Stand to the right of the switch
  - STEP 4 Turn face away and pull switch with left hand.
- Lockout the main power to the equipment to be worked on by placing a lock and tag on the power or disconnect switch while it is on the "OFF" position.
- Test the equipment to make sure it will not start, by pressing the "START" button. Then test the start operation again only then commence repair or maintenance work.
- When the work is completed, the designated employee will make a final check of the equipment to assure that it is safe to operate before proceeding with clearing of lockout and tag.
- Notify the workers in the area that the equipment will be re-energized.
- A start-up test will be completed to ensure the equipment operates normally.

If work is not completed by the end of the shift or if the lockout will be in place for some time (i.e., seasonal), discuss the appropriate lockout procedure with the supervisor or onsite personnel responsible for the equipment.

Lock Removal by Others: If the employee has left the site (quit, discharge or injured), his/her personal locks must be removed from service until the keys are recovered. No one shall remove any personal lock other than his/her own except as noted below. The owner of the personal lock must be positively identified. All reasonable efforts have been made to contact the employee who placed the lock and have him/her come back and remove his/her lock. If the employee cannot be contacted or is incapable of removing the lock, the supervisor must ensure that no other employees will be endangered if the lock is removed and that no process or machinery will be damaged. Lock removal should be done with the master key, cutting the lock or scissors as a last resort. All information regarding the personal lock removal must be documented and filed by the supervisor.

### **Training**

Senior Management will ensure that affected employees receive adequate training to ensure the effective implementation of this policy. Training may be formal or informal and will be delivered either one-on-one through courses provided by a competent worker or designated representative.



### **Record Keeping**

Written warnings or Instructions to Leave Worksite will be documented, and copies will be kept in the worker's personnel file. Documents and records will be maintained as per our Document and Record Control policy and procedures.

### **Communication**

Workers must be knowledgeable about company rules. Rules will be written and made available in the H&S Manual, in Site Specific Safety Plans, in On-Site Health and Safety binders and posted on the H&S bulletin board at the office. Additionally, company rules will be explained to workers through one or more of the following processes: rules specific to training, i.e., lockout tagout, working at heights, confined spaces etc. will be communicated by the training facilitator, explained as part of the New Worker Orientation process and/or included as part of the Site Orientation process.

### **Evaluation**

This policy will be evaluated at least annually by management to ensure it is being fully implemented and it is effective. Any changes to the policy will be communicated to the appropriate parties.

# Personal Protective Equipment (PPE)

## Policy Statement

C&M Electric is committed to establishing, implementing, monitoring, and maintaining a documented policy statement and procedure for Personal Protective Equipment (PPE).

The purpose of the Personal Protective Equipment Policies is to protect C&M Electric employees from exposure to workplace hazards and the risk of injury through the use of personal protective equipment (PPE). PPE is not a substitute for more effective control methods and its use will be considered only when other means of protection against hazards are not adequate or feasible. It will be used in conjunction with other controls unless no other means of hazard control exist.

Senior Management will ensure that:

- Work tasks requiring PPE are documented and specific criteria used to select appropriate PPE.
- Written rules and/or guidelines for the proper fitting, care and use of PPE be developed and that workers are made aware of them.
- Appropriate PPE be provided and/or made available to workers for specific activities.

PPE will be inspected and maintained as per manufacturers and legislative requirements.

Management, supervisors, workers, subcontractors, and suppliers use required PPE. All PPE will meet the requirements of Occupational Health and Safety legislation.

PPE that is damaged, or in need of service or repair will be removed from service immediately.

PPE that has been removed from service will be tagged "OUT OF SERVICE." Any PPE tagged "OUT OF SERVICE" will not be returned to service until repaired and inspected by a qualified person.

C&M Electric will maintain appropriate inspection and service logs for specialty PPE.

PPE will not be modified or changed contrary to manufacturer's instructions or specifications or applicable legislation.



**Ken Crawford**  
President, C&M Electric  
January 31, 2023

### Procedure

The purpose of the Personal Protective Equipment (PPE) is to protect C&M Electric employees from exposure to workplace hazards and the risk of injury through the use of personal protective equipment (PPE). PPE is not the most effective control methods, and its use will be considered only when other means of protection against hazards are not adequate or feasible. PPE will be used in conjunction with other controls unless no other means of hazard control exist.

Personal protective equipment (PPE) will be provided, used, and maintained when it has been determined that its use is required to ensure the health and safety of our employees and that such use will lessen the likelihood of occupational injury and/or illness.

### Purpose

The purpose of the Personal Protective Equipment Policy and Procedure is to protect C&M Electric employees and subcontractor employees from exposure to workplace hazards and the risk of injury through the use of personal protective equipment (PPE).

### Relevant Definitions

Personal Protective Equipment - Any device worn by a worker to protect against safety or health hazards. PPE reduces occupational risk but does not eliminate workplace hazards. Failure to use PPE properly may diminish the effectiveness of the protection. Standard PPE includes hard hats, safety boots, eyeglasses, etc.

Specialty PPE – Additional job specific or specialized PPE, such as rubber insulated gloves, arc flash clothing, etc.

Competent Person - A person who, because of knowledge, training, and experience, has the acquired skills to organize specific activities and is familiar with the Occupational Health and Safety Act and applicable Regulations.

Canadian Standards Association (CSA) - The CSA is a not-for-profit, independent, private sector organization that serves the public, governments, and business as a forum for national consensus in the development of standards, offers certification testing and related services.

### Forms

C&M Electric uses the following forms for Personal Protective Equipment:

Supervisor Inspection	WI2 A F2
Health and Safety Representative Inspection	WI2 A F3
EWP & Fall Arrest Inspection	WT2 A F6
Job Hazard Analysis, Work Task Manual, Site Specific Safety Plans	

### Responsibilities

#### Senior Management

- Ensure that work tasks requiring PPE are documented with specific criteria identified to use and select the appropriate PPE.
- Written rules and/or guidelines for the proper fitting, care and use of PPE be developed and that workers are made aware of them.
- Ensure that PPE is inspected and maintained as per manufacturers and legislative requirements.
- Management, supervisors, workers, subcontractors, and suppliers are expected to use PPE as required.
- Ensure that appropriate PPE be provided and/or made available to workers as required.

#### Supervisors

- Ensure damaged or defective PPE is removed from service and repaired or replaced, as required, by a qualified individual.

- Maintain inspection and service logs for specialty PPE, such as rubber insulated gloves.
- Ensure that PPE is not modified or changed contrary to manufacturer's instructions, standards, or laws.
- Reference job hazard assessments, work task manual and SSSP to review and assign the required PPE for a specific task.
- Ensure workers receive adequate training for the safe use, selection, and care of PPE.

#### **Workers**

- Wear and use any safety devices as directed by C&M Electric, constructor and/or regulation.
- Inspect PPE prior to use and report any defective or damaged items.
- Follow manufacturer guidelines for PPE selection, use and storage.
- Ask questions when in doubt.
- Attend and participate in any training provided by C&M Electric regarding PPE.

#### **Operations/H&S Coordinator**

- Occasionally, conduct PPE inspections to ensure PPE is in good order.
- When required, arrange for additional training for PPE.
- Support senior management and supervisors in determining the appropriate PPE to use and the applicable care, usage, and storage requirements.

#### **H&S Representative / JHSC**

- Participate in PPE selection and procurement.
- Be consulted when PPE is being purchased.
- Conduct workplace inspections and report any issues with PPE to supervisors.

#### **Subcontractors**

- Work in accordance with C&M Electric policy, site specific and legal requirements for PPE.
- Ensure workers receive adequate training and supervision.

#### **PPE Program Elements**

- 1) Identification and risk assessment
  - a. Designated team members will conduct a hazard identification and risk assessment at the workplace and examine work practices, processes, job procedures, equipment, products, workplace layout, SDS and individual factors. Particular attention should be paid to job requirements as some types of hazards require more than one piece of PPE.
- 2) Selection of appropriate Controls
  - a. Controls will be established for the purpose of eliminating or controlling the hazards, PPE will be used as the last line of defense.
- 3) Selection of appropriate PPE
  - a. Once PPE has been established as the control the H&S Coordinator along with the H&S Consultant will determine the appropriate PPE and will consult product specifications to determine if the level of protection is sufficient. The selected PPE will match the hazard and will be evaluated by supervisors, workers, H&S representatives.
- 4) Fit verification
  - a. Once PPE has been selected, any specific fit components will be considered. This includes considerations for worker individual size and additional training for specialized PPE.
- 5) Regular maintenance and inspections

- a. Workers are required to conduct an inspection of the PPE prior to use. If a defect is noted, workers are to notify the Supervisor immediately who will remove the PPE from service and replace the item. C&M Electric will maintain an inspection log for specialty PPE as per manufacture and legislative requirements. All harnesses are inspected prior to use by the operator through the EWP & Fall Arrest Inspection. Only workers who have completed MOL required WAH will be issued a harness.

6) Education or training

- a. Workers are educated and made aware of the PPE guidelines during the New Worker Orientation and at the annual Health & Safety meeting. Furthermore, as PPE is a common topic for ToolBox Talks, workers are reminded periodically throughout the year. Management support
- b. Senior management and supervisors are committed to the ongoing evaluation of the PPE policy.

7) Auditing

- a. C&M Electric utilizes the services of a Health & Safety consultant to conduct monthly site inspections on sites with 5 or more workers. The intent of the third-party inspections is to ensure health and safety compliance and that management, supervisors, workers, and sub-contractors are adhering to the PPE policy. .

**PPE Requirements**

Head Protection

Head protection appropriate for the circumstances must be worn at all times on a project. Hard hats must have a shell which can withstand a dielectric strength test at 20,000 volts phase to ground. Hard hats must be Class "E" as per CSA Standard CSA Z94.1 - 15.

Foot Protection

Protective footwear appropriate for the circumstances must be worn at all times on a project. CSA approved Grade 1 safety boots or safety shoe bearing a green triangular patch will be worn at all times on a construction project as per CSA Standard CSA Z195 - 14 & 16. Other protective footwear classifications may be required depending on the work being performed. Waterproof boots meeting the above standards will be acceptable.

Eye Protection

Eye protection, appropriate in the circumstances, must be used where there is a danger of flying objects, particles, liquids, sprays, radiant energy, welding flash, or other matter entering the eyes. Protection can take many forms including safety glasses, goggles, or full-face protection. Properly fitted eye protection appropriate to the task and hazard that complies with CSA Standard CSA Z94.3 - 15 and CSA Standard CSA Z94.3.1 -16. The minimum requirement is CSA approved safety glasses, equipped with full side shields. Face shields are required when handling chemicals that could splash and cause eye or skin injury.

Hearing Protection

Hearing protection, appropriate in the circumstances, must be used where there is a danger of hearing injury or whenever sound levels exceed 85 decibels. C&M Electric will ensure hearing protection devices (HPDs) is used by workers to protect from sudden or prolonged noise exposure of 85 dB or more. HPDs include CSA approved earplugs or muffs. HPDs will be provided by C&M Electric. Ear buds or any listening device are prohibited and shall not be worn.

Respiratory Protection

Wherever possible, work areas will be ventilated to reduce hazards from dust, fumes, gases, or vapors. Where ventilation is not practical, respiratory protection will be used. Respiratory protection will include CSA approved dust

masks, air-purifying respirators, and supplied-air respirators. Fit testing is required every 2 years.

#### Hand and Skin Protection

Workers will use protection appropriate in the circumstances when there is a risk of injury. Workers will use protection appropriate in the circumstances when there is a risk of injury from contact between the worker's skin and: an object that may puncture, cut, or abrade the skin, a noxious gas, liquid, fume or dust, a hot object, hot liquid or molten metal or radiant heat. Adequately protect from extreme temperatures, vibration, contact stress, abrasions, punctures, energy sources and chemical agents defined under WHMIS regulations or any other act or legislation to protect against any noxious gas, liquid, fume, or dust will be worn by workers. Skin protection includes gloves (latex, Neoprene, leather), aprons or other impermeable clothing including long sleeve shirts and pants. Supervisors will ensure workers are wearing appropriate protective equipment for the task. Appropriate personal protection shall be used whenever injury or illness due to absorption of dangerous substances is possible. Reflective work wear is required for workers working outdoors and who may be exposed to vehicular traffic. Clothing should not be loose, greasy, oily, torn, or ragged. It is recommended that jewelry not be worn or worn under clothing. Long hair must be tied back or otherwise confined.

#### Fall Protection

If not practicable to install guardrails to protect workers fall protection PPE is required. Fall protection equipment including all components of a travel restraint system, fall restricting system, fall arrest system or safety net must be CSA approved.

For full details on the uses, care and maintenance of fall protection PPE, workers must complete Working at Heights (WAH) training. More information can be found in our Work Task Manual under *Working at Heights*.

#### Electrical - Live Wire Work

PPE adequate to protect a worker must be worn whenever a worker is exposed to the hazard of burns or shock from live electricity. Mats, shields and other protective devices or equipment, including personal protective equipment, adequate to protect the worker from electrical shock and burn must be worn when required - as per Section 191 (7) of the OHS Act and Regulations for Construction. Additional information on the use, care, inspection, and maintenance of specialized PPE can be found in our Work Task Manual under *Electrical Safety*.

#### **Availability of PPE**

Workers must use PPE in the workplace when it is required. Employer responsibilities include providing instruction on what PPE is needed, maintenance and cleaning of the equipment, and educating and training workers on proper use of PPE.

PPE, provided by us, will be available in sufficient quantities and sizes, and will be stored in a designated, safe, dry area when not in use.

#### **Training**

Any employee required to wear PPE will receive training on its importance, fit, usage, adjustment, maintenance, and inspection. Periodic retraining will be offered to both the employees and the supervisors, as needed.

#### **Record Keeping**

All documents and records generated by the implementation of this policy, will be kept on file per the Document and Record Control Policy.

#### **Communication**

PPE requirements will be documented and made available to workers using one or more of the following:

- Company H&S Manual, provided to every worker as part of the C&M Electric New Worker Orientation process.

- Documented in the Site-Specific Safety Plan (SSSP) posted at the work site.
- Documented in our Work Task Manual (WTM).

**Evaluation**

This policy will be evaluated at least annually by management to ensure it is being fully implemented and it is effective. Any changes to the policy will be communicated to the appropriate parties.

# Preventative Maintenance

## Policy Statement

C&M Electric is committed to establishing, implementing, monitoring, and maintaining a documented policy statement and procedure for preventative maintenance.

Keeping C&M Electric running efficiently and to ensure the safety of our workers, requires us to ensure that all equipment is functioning optimally. To do so, routine preventive maintenance will be conducted.

The procedure requires:

- An inventory of items to be maintained.
- The use of preventative maintenance schedules.
- Manufacturers' preventative maintenance guidelines and legislated requirements be met.
- Records including corrective actions taken be kept.

Worker(s) performing the inspection and maintenance be adequately qualified.

Overdue and/or defective tools, equipment, facilities, and vehicles be tagged and removed from service.

Corrective Actions will be recorded on work orders, maintenance logs, or checklists. The date the corrective action has been completed, indicating it is safe for the item to be used, and the name of the person performing the corrective action will be included on the record.

Only competent and qualified workers will perform inspections and maintenance. Training and qualification credentials will be filed for no less than four years and will be readily available. Credentials may include a certificate of qualification, specific manufacturer's training, and/or years of experience.

Tools, equipment, and vehicles that are overdue and /or defective tools, equipment and vehicles will be removed from service immediately and will not return to service until a competent and qualified worker indicates that the tool, equipment, or vehicle is in good working order.



**Ken Crawford**

President, C&M Electric

January 31, 2023



## Procedure

C&M Electric is committed to conducting preventive maintenance to ensure a safe work environment for all workers and to ensure the efficient operation of all tools and equipment. C&M Electric will ensure regular maintenance of tools, vehicle, and equipment to improve equipment life, minimize breakdowns and to prevent injury.

The preventative maintenance program includes:

- Annual inventory of all tools and equipment.
- Schedule of all preventative maintenance.
- Ongoing verification that manufacturer guidelines and legislative requirements are met.
- Training and certification for workers as required.
- Worker inspection prior to use of tools and equipment.
- Tagging and removing defective tools and equipment from the workplace.
- Only trained and qualified persons can perform repairs or maintenance.

## Definitions

Preventative Maintenance - Preventive maintenance is service that is regularly and routinely performed on physical assets to reduce the chances of failure. Maintenance may occur at schedule frequency, when a prescribed level of wear/time has been reached, when the tool or equipment requires maintenance due to a malfunction.

Scheduled Maintenance – A list of predetermined maintenance actions conducted at regular time intervals that are aimed at the prevention of breakdowns.

Qualified Person – An individual who has the required training, equipment, and knowledge to complete the repair or service.

## Forms

C&M Electric uses the following forms for Preventative Maintenance:

Preventative Maintenance Schedule	PM2 A F2
Tool & Equipment Inventory	PM2 A F1
Tags used to identify equipment that requires repair	

## Responsibilities

### Senior Management

- Generate an inventory of all tools and equipment that require regular maintenance.
- Develop a preventative maintenance schedule for tools and equipment to ensure they meet manufacturer's preventive maintenance guidelines and legislative requirements.
- Ensure operation manuals are readily available.
- Ensure preventative maintenance schedules are being followed.
- Ensure vehicles, tools and equipment are properly serviced as per schedule.
- Ensure that maintenance is performed only by trained and qualified persons.
- Maintain detailed maintenance records.
- Ensure defective tools and equipment are removed from service and are repaired per manufacturer requirements.

### Supervisors

- Ensure that tools and equipment are in good order before assigning them to a worker.
- Ensure that tools and equipment are removed from service if they are defective or not in good order.
- Follow all manufacturer guidelines for the use and maintenance of tools and equipment.
- Ensure workers complete inspection prior to the use of any tools or equipment.
- Ensure operation manuals are readily available.

#### **H&S / Operations Coordinator**

- Assist with the implementation of preventative maintenance program.
- Assist with inventory and record keeping ensuring all tools and equipment are being serviced or maintained as required.
- Provide ongoing support to management, supervisors and workers as requested.

#### **H&S Preventative / JHSC Member**

- Make recommendations and be consulted on the preventative maintenance program.

#### **Workers**

- Use tools and equipment as recommended by employer.
- Follow all manufacturer guidelines for the use and maintenance of tools and equipment.
- Report any defects identified.
- Never use any tools or equipment that appear defective or are missing the required maintenance.

#### **Subcontractors**

- Ensure tools and equipment used while working for C&M Electric is in good working order and maintained per manufacturer guidelines or legislative requirements.

#### **Annual Inventory of Tools and Equipment**

All tools, equipment, machines, and vehicles must be properly maintained so that workers are not endangered. Manufacturer requirements and construction regulations form the basis of the preventative maintenance program. All preventive maintenance will be planned as far in advance as possible. All jobs requiring the use of tools and equipment must ensure that they are in good order prior to use on site.

C&M Electric complies and keeps current a list of all tools, equipment, machines, and vehicles that require regular maintenance on eCompliance which is maintained by the Warehouse Manager.

The inventory list will include the following information:

- Description of the tool or equipment.
- Identification number, if any.
- For vehicles, include vehicle identification number and license plate number.
- Location where the equipment is stored.
- Maintenance records

Any tools or equipment used by C&M Electric will either be owned by us or rented through a qualified third-party rental company. In the event of using rental equipment, the rental company will be required to ensure that all tools and equipment are properly maintained and inspected prior to delivery to site.

As is required by legislation, regular maintenance must be documented and kept with the tool, equipment, machine, and vehicle. Proof of such training must be delivered at the same time as the tool, equipment, machines, or vehicle. Company operators must ensure such documentation is provided at time of delivery. If the documentation is not available, report to the supervisor and the supervisor will take adequate steps to receive the required documentation.

#### **Schedule of all Preventative Maintenance**

All tools and equipment are to be inspected and maintained in accordance with our maintenance schedule. Records or inspections and maintenance will be completed and maintained for review and approval by Senior Management. C&M Electric will create preventative maintenance schedules for tools, equipment, machines, and vehicles requiring regular maintenance. An annual inventory of all equipment is completed and documented along with a planned preventive maintenance, repair anticipation and long-range replacement plan. Based on the inventory, a calendar is developed that guides us in completing timely servicing and maintenance of all equipment. Maintenance work will be performed in a designated area. Those required to perform the work will be trained in spills management.

Preventative Maintenance will be recorded on work orders, maintenance logs, or checklists. The date the work has been completed, indicating it is safe for the item to be used, and the name of the person performing the work will be included on the record.

#### **Ongoing Verification that Manufacturer Guidelines and Legislative Requirements are Met**

All created schedules will meet the manufacturer's suggested preventive maintenance guidelines, legislated requirements, and requirements of our organization, for each specific tools, equipment, machines, and vehicles requires regular maintenance.

Preventive Maintenance will be completed in accordance with the defined procedure. When manufacturer's guidelines are available, preventative maintenance will be completed in accordance with the manufacturer's instructions. Tools, equipment, machines, and vehicles that are sent out to third party technicians, must still be included on maintenance schedules to ensure that they are sent out when required.

Maintenance records will be reviewed regularly but at least annually to ensure maintenance is systematically scheduled and completed as required according to manufacturer's and/or legislated requirements.

#### **Training and Certification for Workers as Required.**

Workers who perform inspections and/or maintenance and/or repair work will have the appropriate skills or will be under the direct supervision of a qualified technician or qualified contracted services.

Where required, persons performing specific work, must hold a current qualification certificate. Training certification of workers performing maintenance will be kept readily available.

All workers who operate tools, vehicles, equipment, and/or machinery will have the appropriate skills, accreditation and/or certification and must be trained in:

- Their responsibilities to operate the tools, vehicles, equipment, and/or machinery in a safe manner.
- The safety requirements for the tools, vehicles, equipment, and/or machinery.
- The manufacturer's operating and maintenance procedures.

Scissor lifts will be inspected prior to use by the operator with valid WAH training and Scissor Lift training. Annual inspections will be conducted by a licensed mechanic and a major inspection will be conducted every 10 years by an engineer. Safety harnesses will be inspected prior to use before the operator and annually by a qualified inspector.

### **Worker Inspection Prior to Use of Tools and Equipment**

Workers, under direct supervision, will ensure all tools and equipment are visually inspected prior to use.

Safety equipment will be inspected prior to use and as required by this policy. Any repairs/restocking etc. must be done prior to taking the equipment to the worksite. Once on site, safety equipment is to be inspected at least monthly by a competent worker.

Vehicle and equipment inspections will be completed by the first driver of the day, where required. The report is valid for 24 hours. Whenever a deviation from the required condition(s) occurs, the worker will report the deviation to the supervisor/technician immediately.

### **Tagging and Removing Defective Tools and Equipment from the Workplace**

Tools, equipment, and vehicles that are overdue and /or defective tools, equipment and vehicles will be removed from service immediately and will not return to service until a competent and qualified worker indicates that the tool, equipment, or vehicle is in good working order. No vehicle, machine, tool, or equipment is to be used if it is found to be defective or hazardous, if the weather or other conditions are such that use is likely to endanger a worker. C&M Electric will execute the following process when an inventory item is deemed by a Foreman or Supervisor as defective:

1. The Foreman/Supervisor will create an Action Item in eCompliance which will include a description of the issue, the required action, the due date and will assign the action to the Warehouse Manager.
2. Once the Action Item is received by the Warehouse Manager, they will update the status of the item to either "In for repair" if the item can be repaired or "Destroyed" if the item can't be fixed.
3. If the tool is classified as "In for repair", The Warehouse Manager will determine the Corrective Action required and once completed will note the Action Taken in eCompliance and will submit to the H&S Coordinator for approval.
4. The H&S Coordinator will review the Action Item and will either approve or reject the Corrective Action. If approved and corrected, the H&S Coordinator will update the status of the item to "In Service".

Workers must NOT use tools/equipment/vehicles where the inspection timeframe has lapsed. Broken or damaged equipment will be tagged and removed from service. Report to the supervisor Equipment will be repaired by qualified personnel only prior to being returned to service.

### **Only Trained and Qualified Persons can Perform Repairs or Maintenance**

Workers who perform maintenance work on company tools will have the appropriate skill, accreditation and/or certifications. This applies to both company employees and to contracted maintenance services. Only competent and qualified workers will perform inspections and maintenance. Training and qualification credentials will be kept on file, if required. Credentials may include a certificate of qualification, specific manufacturer's training, and/or relevant work experience.

### **Training**

Any employee to use tools and equipment must be trained in the proper use and maintenance of the items. Periodic retraining will be offered to both the employees and the supervisors, as needed.

### **Record Keeping**

All documents and records generated by the implementation of this policy, will be kept on file per the Document and Record Control Policy.

### **Communication**

The preventative maintenance program will be documented and made available to workers using one or more of the following:

- Company H&S Manual, provided to every worker as part of our New Worker Orientation process.

### **Evaluation**

This policy will be evaluated at least annually by management to ensure it is being fully implemented and it is effective. Any changes to the policy will be communicated to the appropriate parties.

# Training

## Policy Statement

C&M Electric is committed to establishing, implementing, monitoring, and maintaining a documented policy statement and procedure for training.

The procedure requires:

- Setting roles and responsibilities for those administering and managing the training procedure.
- Identifying competencies for each task.
- Determining health and safety training needs by:
  - Reviewing legislated training requirements.
  - Determining how training will be administered and managed.
  - Implementing a method for the evaluation of learning.
  - Implementing a method for maintaining training records.

Worker Orientation is mandatory for all workplace personnel prior to the commencement of work. Site Specific Orientation will be delivered to all workers prior to the commencement of work.

A Worker Orientation Package has been developed to ensure consistency of information communicated. Worker Orientation packages will require both the worker and the program facilitator to sign the orientation record upon completion of the training.

Training Records will identify and record what mandatory training and legislated requirements have been completed. Workers will be required to provide adequate proof of training to be credited.

C&M Electric will ensure that workers receive task specific training prior to performing the work. Training Records will indicate additional task/job specific training provided.

Training will be delivered by a "competent person" as defined under the OHSA.



**Ken Crawford**  
President, C&M Electric  
January 31, 2023

## Procedure

C&M Electric is committed to ensuring all workers receive the required training to competently complete their work. Workers will receive training as outlined in our H&S program in addition to any training that is required by legislation.

Training provided to workers can be formal, informal, or one-on-one. It can be desktop training, practical training, blended training, or it can be delivered by a designated trainer, a mentor or supervisor/delegate. Formal training will be delivered primarily by third party trainers. In house training will be delivered by a "competent person" as defined by the OHSA.

Training will be provided to workers through safety meetings, one-on-one training or through organized and topic-specific trainings or by any other means when and where necessary. C&M Electric recognizes that workers have the "right" to know how to perform their work safely.

## Definitions

New Worker – For the purpose of this program, a new worker is any person who is a new worker, employee, student, intern, or apprentice with C&M Electric.

New Worker Orientation – A training package required for all workers upon initial hiring and prior to be granted access to C&M Electric worksites. A systematic process of familiarizing the worker with legislated, company and industry standards.

Training Record – List of all workers indicating the course name and date of all training, certificates or courses taken. Will identify and record what mandatory training and legislated requirements have been completed. Workers will be required to provide adequate proof of training to be credited.

Task-Specific Training – Any job specific training that provides goal-directed practice to improve functional abilities. the process of familiarizing the worker with the jobsite and work tasks necessary for the worker to perform their job safely on a specific project. We will ensure that workers receive task specific training prior to performing specific work, this may include site specific orientation, confined space entry and rescue, site specific fall rescue training, etc. Training Records will indicate additional task/job specific training provided.

Third Party Training – Courses or programs provided by a third party to provide additional knowledge and skill.

Trades and Qualifications – Completion of a certified trade or apprenticeship program through an accredited party.

Competent Trainer – Individual who has the required training, knowledge, and certification to deliver training.

## Forms

C&M Electric uses the following forms for Training:

Record of Training	TRA2 A F2
Worker Orientation Package	TRA2 A F3
Site Specific Orientation Checklist	TRA2 A F4
Site Specific Safety Plan	HA1 A F1

## Responsibilities

### Senior Management

- Identify and outline training requirements for all levels of workers within our organization.
- Ensure new workers receive H&S Orientation prior to the commencement of work included in the C&M Electric New Worker H&S Manual.

- Ensure workers are trained in legislated H&S responsibilities and industry standards.
- Ensure training requirements, specific to a project, are identified.
- Ensure additional training for workers being promoted or assuming new responsibilities.
- Ensure a competent and qualified person(s) delivers all training, as defined under the OHSA.
- Ensure Records of Training (ROT) and Training Records are recorded, kept, and maintained.
- Regularly, but at least annually, evaluate training qualifications at all levels to ensure they are adequate and that they are current with legislated standards and best practices.

### **Supervisors**

- Be knowledgeable in the training expectations and standards of our company.
- Ensure that all workers have completed the Worker Orientation process prior to working.
- Complete the site-specific orientation with all workers on a project.
- Ensure workers have received necessary training so they can perform their work in a safe manner.
- Require at least one representative from each subcontractor to complete the site-specific orientation.
- Keep accurate records of training delivered on site.

### **H&S / Operations Coordinator**

- Assist in ensuring workers have adequate training for the work tasks they will be expected to perform.
- Deliver or arrange for training when it is deemed a worker has inadequate training.
- Assist Senior Management with the implementation of this Policy and Procedure.
- Continually monitor for changes to codes, standards, or regulations where additional training may be required and advise management on new training requirements.

### **H&S Preventative / JHSC Member**

- Make recommendations and be consulted on the training program.

### **Workers**

- Participate in any safety meeting and or training required by our organization.
- Use all skills and techniques when performing work related to the training.
- Always carry proof of training or certification.
- Work in a manner consistent with company and training expectations.
- Report any infractions to the supervisor.

### **Subcontractors**

- Ensure workers have the required training prior to commencing work on a C&M Electric site.

### **Training Needs**

The H&S Coordinator will present recommendations for OHS training needs to Senior Management at the annual Management Review meeting by:

- Conducting a review of all jobs and positions within C&M Electric and ensuring the applicable training requirements have been outlined.
- Reviewing legislated and other training requirements.
- Taking into consideration various levels of responsibilities and abilities, language skills and literacy.



- Ensuing the training provides adequate accommodations, if required. Including information on our H&S policies and procedures to including purpose, roles, responsibilities and rights, importance of conformity, potential consequences for deviations or noncompliance and importance of workers' participation.

Senior Management will review the recommendations and any additions to training competencies based on specific work tasks/tools/equipment will be documented in our Work Task Manual.

#### **Minimum Required Training**

All employees, including Senior Management, Supervisor, H&S / Operations Coordinator, and workers will receive the following training at a minimum:

- Worker 4 Step / Supervisor 5 Step H&S Awareness Training
- New Worker Orientation outlining our H&S policy and program.
- Workplace Hazardous Material Information System (WHMIS) 2015

Additional training that may be required depending on the worker duties and responsibilities include but are not limited to:

- Working at Heights (WAH)
- Standard First Aid and CPR
- Joint Health and Safety Committee Certification
- Site-specific, tool or equipment specific training such as elevated work platform, confined space entry, chainsaw, etc. These training requirements will be reviewed at the planning stages of upcoming projects prior to starting work.

Site visitors will receive a site-specific orientation outlining any hazards they may be exposed to, the site-specific PPE and emergency response procedures, as well as any other relevant information prior to allowing access to site. Visitors may require escort to specific areas and must be accompanied by a competent person.

#### **In-House Trainer Qualifications**

In-house trainers are required for both the onboarding process and daily site activities. The H&S Coordinator who conducts Employee Orientation training must meet the following requirements:

- Part of management
- 1 year of experience

As apprentices are required to complete 8160 hours of on-the-job work experience, apprentices are to be trained by electricians who hold a valid 309a license in Construction and Maintenance.

#### **New Worker Orientation**

The New Worker Orientation is mandatory for any person who is a new worker, employee, student, or apprentice with C&M Electric prior to commencing work. Workers will not be allowed to start work until all training requirements have been met.

The orientation will outline but is not limited to the following information:

- Company H&S policy and program
- Company rules
- Progressive disciplinary policies
- 3 worker rights
- Workplace violence and harassment policies

- Workplace parties and their roles and responsibilities
- Reporting requirements
- Training

Upon completion of the New Worker Orientation, the Acknowledgment and Agreement Form will be kept in eCompliance.

### **Site Specific Orientation**

Prior to starting work at a new site or on a site under the control of another Constructor, workers will be required to complete a site-specific orientation. Supervisors will deliver site-specific orientation prior to a worker commencing work on the project. Proof of attendance will be recorded using the Site-Specific Orientation form.

#### **C&M Electric Site**

- Workers will review the Site-Specific Safety Plan (SSSP) with the site supervisor.

#### **Constructor Site**

- Workers will complete the site orientation in addition to reviewing the C&M Electric SSSP.

Information to review in the site orientation includes but is not limited to:

- Emergency response procedures
- Names of site personnel (first aider, H&S rep, project manager, etc.)
- PPE requirements
- Specific training requirements
- Any other relevant information regarding the site that may have an impact on worker health and safety.

### **Trade Qualification or Certifications**

Any workers who have trade certifications must provide a copy to their supervisor and/or the H&S / Operations Coordinator to file in the employee record. Additionally, if the worker has any other relevant H&S training, records must be provided and stored in the employee record. This information will also be included in the training record.

### **Training Record**

Training records allow for a quick and over-all view of the training status of all workers. C&M Electric will ensure that accurate training records, for all employees, are readily available to provide a snapshot of worker training qualifications. Training will be tracked by the H&S Coordinator, or their delegate, using eCompliance. The database will be used to monitor and track training and the following reports will be generated to identify when training requirements have not been met or when training requirements are no longer current:

- Valid certificates, certificates expiring within 3 months and certificates required.
- Certificates outstanding by course.
- Certificates outstanding by employee.
- Certificates outstanding by job profile.

Training records will be updated after the delivery of training or at least annually. It will be the responsibility of the Health and Safety Coordinator, or their delegate, to ensure the records are kept current.

### **Ensuring Records are Updated**

At least annually, Senior Management and/or the H&S /Operations Coordinator, or their delegate, will review the training needs. Through this process it will be determined what training is required and/or would be beneficial to our team and what training is lapsed or will expire. The H&S Coordinator, or their delegate, will arrange to have the training delivered. The H&S coordinator will regularly update the Training Records when workers have completed a training requirement.

### **Supervision**

C&M Electric believes that adequate training is essential to the attainment of our goal of no injuries. Training is to be considered a condition of employment by all workers. Workers will be expected to attend training courses as required. Their participation in the course will be mandatory and will be considered a component of the evaluation process. Workers who willingly do not attend training, will be subject to discipline as per our disciplinary policy.

### **Training**

Senior Management will ensure that affected employees receive adequate training to ensure the effective implementation of this policy.

### **Record Keeping**

All documents and records generated by the implementation of this policy, will be kept on file per the procedure outlined in the Document and Record Control.

### **Communication**

This policy will be communicated to all employees by way of meetings, safety talks, or any other method deemed effective by management.

### **Evaluation**

This policy will be evaluated at least annually by management to ensure it is being fully implemented and it is effective. Any changes to the policy will be communicated to the appropriate parties.

# Communication

## Policy Statement

C&M Electric is committed to establishing, implementing, monitoring, and maintaining a documented policy statement and procedure for health and safety communication.

Communication is the act of transferring information from one place, person, or group to another. There are a wide range of ways in which we communicate and more than one may be occurring at any given time.

This procedure requires:

- Senior management to ensure that an annual company-wide health and safety meeting is held with all employees to include the OHSMS and its implementation.
- Communication will be delivered in a manner that is understood by the receiver of the message while considering ability, language skills and literacy.
- Communication provides the opportunity for input from workers.
- Procedures for receiving, documenting, and responding to internal and external OHS communications are implemented.
- Safety Talks are held at least weekly and documented to indicate the date, topic, attendees and facilitator and any resulting action items.
- Bulletin boards will be used to post relevant and legislated and relevant information. These bulletin boards will be posted in high traffic areas and will be updated at least annually.
- On-site safety binders will be available on each jobsite and within each company vehicle to provide workers with valuable information that they can review regularly.



**Ken Crawford**  
President, C&M Electric  
January 31, 2023

## Procedure

Communication is the act of transferring information from one place, person, or group to another. C&M Electric is committed to ensuring the relevant information is transferred to the appropriate personnel as it relates to health and safety matters. Effective internal communication is critical to the success of our organization. It is the policy of C&M Electric to ensure that communication is well coordinated, effectively managed and responsive to the information needs of employees.

The written policies and procedures provide the foundation of the health and safety program, but the written elements must be fully communicated to be effective.

Communication must be delivered in a manner that is understood by the receiver of the message and considers ability, language skills and literacy. Additionally, effective communication is two-way in that it provides the opportunity for input from workers.

C&M Electric will communicate health and safety through our written H&S policies and program, safety talks, job hazard analyses, work task manual, bulletin boards and on-site safety binders.

## Definitions

Communication – The exchanging of information by speaking, writing, or using other medium. The successful conveying or sharing of ideas and feelings.

Verbal communication – Communication that involves the exchange of words, includes face-to-face, telephone or other media (such as video conference).

Non-Verbal Communication – Communication that is non-communicative, includes body language, gestures, posture.

Written Communication – Communication that involves written words, such as letters, e-mails, social media, books, magazines, or other media.

Visualizations – Communication through graphs and charts, maps, or other visualizations.

Visitor – An individual, other than an employee of the company, may include delivery companies, clients, members of the public and service providers who is entering the workplace.

Host – The employee of the company who is assigned to accompany or escort a visitor.

Competent Person – A person who, because of knowledge, training and experience has the acquired skills to organize specific activities and is familiar with the OSHA and applicable Regulations.

## Forms

C&M Electric uses the following forms for Communication:

All Company H&S Meeting Minutes	COM2 A SA10
Safety Toolbox Talk	COM2 A F3
Visitor Agreement	COM2 A F5
Supervisor Inspection	WI2 A F2
Site Specific Safety Plan	HA1 A F1
Worker Orientation Package	TRA2 A F3

## Responsibilities

### Senior Management

- Ensure compliance with relevant legislative requirements and standards of best practice.
- Approve all written health and safety communication.

- Approve website information prior to it being included on the website.
- Ensure communication is delivered in a manner that is understood by the receiver of the message by considering ability, language skills and literacy.
- Establish, implement, and maintain a process for internal and external communications relevant to our OHSMS, which provides for the gathering, updating and dissemination of information.
- Ensure safety talks are delivered by supervisors and documented at least weekly.
- Ensure supervisors record attendance for meetings and safety box talks.
- Ensure records of all communications governed by the policy, are retained per our retention policy.
- Senior Management will promote and plan for worker participation in the development and review of OHS policies, procedures, processes, and objectives. This will be achieved by consulting with workers and/or worker representatives and the JHSC concerning, but not limited to:
  - The development, implementation, maintenance, and monitoring of our OHS program.
  - Communicating goals and objectives and providing regular feedback on progress achieved.
  - Conducting anonymous worker surveys.
  - Involvement in the annual internal audit process.
  - An annual review of parts of our OHS program, OHSMS and Work Tasks Manual.
  - The planning and organization of health and safety training.

#### **Supervisors**

- Ensure communication is delivered in a manner that is understood by the receiver of the message by considering ability, language skills and literacy.
- Ensure opportunity for input from workers wherever possible.
- Ensure safety talks are delivered at least weekly.
- Ensure records of all communications governed by the policy, are accurate and retained as required.

#### **Workers**

- Actively participate in any H&S meetings and sign name to confirm attendance.
- Ask questions and provide input on H&S matters.
- Complete and submit forms and checklists as required.

#### **Operations/H&S Coordinator**

- Assist management with the implementation of this policy.

#### **H&S Representative / JHSC Members**

- Be consulted on and make recommendations concerning this policy.

#### **Subcontractors**

- Ensure their workers always work in compliance with this policy.
- Ensure a representative of the company attend all on-site safety meetings.
- Appoint a contact person to be responsible for communicating with C&M Electric representative.

#### **Communication Channels**

C&M Electric has several existing internal communication channels available, including:

### **Annual Safety Meetings**

Safety meetings are an opportunity for management to communicate with workers on how they can do their jobs safer and better. Management will hold an annual safety meeting with the sole purpose of delivering safety information to the workers. C&M Electric will prepare an agenda for the meeting and an attendance record will be kept. The president of C&M Electric will attend the annual safety meeting. There will always be a minimum of one member of upper management at a safety meeting. Records of the safety meeting will include meeting agendas, attendance lists, minutes, and action items.

### **Bulletin Boards**

Bulletin boards will be used to post relevant and legislated and relevant information. These bulletin boards will be posted in high traffic areas and will be updated at least annually. There are several documents required by the OSHA that will be posted on bulletin boards. Where bulletin boards are not practical all required information will be kept in the on-site H&S binder.

### **Job Safety Binder**

On smaller or short-term projects where installation of a Health and Safety Bulletin Board is not practical, supervisors will be equipped with a Jobsite Health and Safety Binder that will contain all the required posted materials.

### **Vehicle Health and Safety Binder**

Each company truck will be equipped with a Vehicle Health and Safety Binder containing all required materials and all H&S information pertinent to the driver.

### **Weekly Toolbox Talks**

Safety meetings are an opportunity for management to communicate with workers on how they can do their jobs safer and better. Safety meetings also allow employees an opportunity to relay H&S concerns and/or improvement ideas. Safety Talks are one of the easiest channels of communication and will be held at least weekly. Safety talks will be documented and will indicate the date, topic, attendees and facilitator and any resulting action items. Safety talks are intended to help workers recognize and control hazards that may be found on construction sites. Safety talks advise workers of existing or potential dangers to their health and safety. Safety Talks will be related to the work being conducted and they will address the hazards and control measures as they relate to the work. Supervisors may reinforce training standards through safety talks. Safety Talks may also serve as a reminder and to reinforce information necessary for workers to perform their work in a safe and healthy manner.

### **Site Specific Safety Plans (SSSP)**

The SSSP will provide supervisors and workers with site specific information relevant to the specific job and location where the work is occurring. The SSSP will be created for each new job and will be reviewed at the onset of the work with the supervisor and workers onsite.

### **New Employee Orientation**

The new employee orientation provides new employees with an introduction to our H&S policies and programs. The orientation provides a detailed overview of our organization and provides workers an opportunity to discuss or raise any H&S concerns.

### **Worker Health and Safety Manual**

The health and safety manual provides an overview of health and safety legislation and outlines the responsibilities of the employer, the supervisor and the worker as defined in the OSHA. All workers will receive a copy of the worker

health and safety manual. Workers will be issued new manuals when information or policies within the manual have been revised or information added.

### **H&S Representative or JHSC**

Management will ensure that workers, or their representatives, are selected in accordance with the OHS Act Section 8 and 9 and that they are consulted in the establishment and maintenance of the OHSMS. The H&S Representative or JHSC will play an integral role in communicating H&S elements onsite and acting as a point of contact for workers.

### **Communication Goals**

It is the aim that all communications will be appropriate, comprehensible, and intelligible for the audience at which it is aimed and consider diversity aspects such as gender, language, culture, literacy, and ability. All workers are required to complete the Worker Emergency Information Form in which they can list if they have a learning disability. If a worker discloses that they have a learning disability, the H&S Coordinator will adapt communication and ensure that the message has been understood. Communications will consider legal and other requirements and ensure that the information to be communicated is consistent. C&M Electric will retain documented information as evidence of its communications, as appropriate.

At every opportunity, the workers will be encouraged to actively participate in all matters concerning our H&S program. Management will make every effort to answer questions, or if necessary, get back to the worker(s) with answers in a timely manner.

### **Internal Communication**

It is important to effectively communicate information about health and safety risks and our health and safety management system, including changes to the system. As a result, the H&S Coordinator sends quarterly newsletters to all workers which includes information relating to any of the below topics:

- Management's commitment to the OH&S management system.
- The identification of hazards and risks.
- Health and safety objectives and programs to achieve them.
- Progress in eliminating hazards and associated OH&S risks.
- Operational changes that might impact our health and safety management system.
- Changes in legislation and regulatory requirements
- Changes to our safe work procedures
- Upcoming H&S Training

For project specific OHS communications, the H&S Coordinator will communicate directly to the Project Manager and address the H&S related issues.

### **External Communication**

External communications pertaining to OHS are overseen by the Project Manager who will communicate directly with the General Contractor and other Sub-Contractors.

### **Subcontractor Communication**

C&M Electric will use a service contract to ensure specific health and safety requirements are communicated to subcontractors. Subcontractors will be required to attest to their commitment to meet these requirements. Site-specific orientation procedure will be used to communicate on-site health and safety issues and to raise health and safety issues.



with contractor's and their workers.

Wherever possible, a designated contact for the subcontractor and the company will be appointed. This allows for appropriate information to be communicated in a timely and consistent manner. This can be especially important in emergency situations where regular updates are required to be delivered in a clear manner.

The following will be considered when communicating with external providers:

- Information about our OHSMS.
- Legal and other requirements that impact on the method or extent of communication.
- Previous H&S performance and history of identifiable incidents.
- The use of multiple contractors at the workplace.
- Emergency response plans.
- Subcontractor coordination.
- The need for additional consultation and/or contractual provisions relating to high-risk tasks.
- Reporting of OH&S performance, incidents, non-conformities, and corrective actions.

#### **Visitor Communication**

Visitors who gain access to a C&M Electric worksite must be communicated some relevant health and safety information must be communicated. The visitor should be accompanied by a host who provides the information as follows:

- Health and safety requirements relevant to their visit.
- Evacuation procedures and responses to alarms.
- Access controls and escort function.
- Details relating to required personal protective equipment (PPE).

#### **Training**

Senior Management will ensure that affected employees receive adequate training to ensure the effective implementation of this policy. Training will be provided to employees through safety meetings, one-on-one training or through organized and topic- specific trainings or by any other means when and where necessary.

#### **Record Keeping**

All documents and records generated by the implementation of this policy, will be kept on file per the procedure outlined in the Document and Record Control.

#### **Communication**

This policy will be communicated to all employees by way of meetings, safety talks, or any other method deemed effective by management.

#### **Evaluation**

This policy will be evaluated at least annually by management to ensure it is being fully implemented and it is effective. Any changes to the policy will be communicated to the appropriate parties.

# Workplace Inspections

## Policy Statement

C&M Electric is committed to establishing, implementing, monitoring, and maintaining a documented policy statement and procedure for workplace and pre-use inspections.

The procedure requires:

- Workplace inspections be conducted, with records kept, to include identifying and preventing potential nonconformities and corrective actions.
- The conducting, with records kept, of pre-use inspections of vehicles, machines, tools, and equipment to include corrective actions.
- Inspection schedules be developed to include identifying who is responsible, when and where.
- Appropriate worker participation in the inspection process
- Meeting all legislation and manufacturers' requirements.

Supervisors and H&S Representatives will be trained on how to conduct inspections, reporting responsibilities and follow up procedures.

Workers are required to perform pre-use inspections of vehicles, machines, tools, and equipment as stipulated by this policy and procedure.

Specific forms and checklists will be developed to record inspections and actions taken. Inspection frequencies will be adhered to.

Workers will be involved in the inspection process by conducting the inspection, being involved in discussions during or following the inspection i.e., safety talks or by any other means as applicable.

Deficiencies will be corrected in a timely manner. Corrective actions will be documented. Workplace inspections will be communicated to senior management and other relevant workplace parties.



**Ken Crawford**  
President, C&M Electric  
January 31, 2023

## Procedure

Workplace inspections are conducted, with records kept, to include identifying and preventing potential nonconformities and corrective actions. C&M Electric will ensure that all vehicles, machinery, tools, equipment, facilities, and worksites be inspected to ensure the safety of the user as well as workers in the area.

The purpose of workplace inspections is to identify hazards with the goal of implementing controls to protect workers. Inspections will be completed by appropriate personnel using the applicable forms to document the inspection. The intent of workplace inspections is that identified deficiencies will be corrected in a timely manner.

Supervisors and H&S Representative / JHSC Members will be responsible for conducting workplace inspections as required by legislation.

Workers are also required to complete pre-use inspections of vehicles, machines, tools, and equipment they are required to use.

## Definitions

Workplace – A workplace is an area where workers are conducting work on behalf of the company, includes construction site, office, shop, yard, projects, vehicles etc.

Inspection – A careful examination of a machine, tool, equipment, or vehicle.

Inspector – The qualified or knowledgeable individual performing the inspection.

Pre-Use Inspections – Inspection of equipment, tools, machinery, or equipment that is conducted prior to use.

Competent Person - A person who, because of knowledge, training, and experience, has the acquired skills to organize specific activities and is familiar with the Occupational Health and Safety Act and applicable Regulations.

C&M Electric will ensure checklist or inspection forms, tailored to the specific inspection requirements, will be developed, and used by those required to perform weekly, monthly, and pre-use inspections. This will be accomplished by:

- Requiring workers to complete the forms/checklists and to submit to the supervisors as required.
- Inspection forms/checklists being submitted to the office in a timely manner.
- Forms/checklist being signed and dated prior to submission.
- Management reviewing completed inspections forms/checklists prior to them being filed.
- Management filing, either as hard copies or electronically.
- Documents and records being maintained as per our Document and Record Policy and Procedure.

If C&M Electric introduces a new vehicle, machine, tool, equipment or process, an evaluation of the inspection process will be done to determine if a new inspection form or procedure must be implemented.

## Forms

C&M Electric uses the following forms for Workplace Inspections:

Health and Safety Representative Inspection	WI2 A F3
Office Inspection	WI2 A F1
Supervisor Inspection	WI2 A F2
Pre-Site Inspection/Job Hazard Analysis	WI2 A F4
EWP & Fall Arrest Inspection	WT2 A F6

Fall Arrest System Inspection	PPE2 A F4
Vehicle Inspection	WT2 A F7

## Responsibilities

### Senior Management

- Develop a Workplace Inspections Policy and Procedure.
- Ensure procedures meet requirements of all legislation.
- Identify what must be inspected to include when, by whom, where and how.
- Develop specific forms for recording workplace and pre-use inspections
- Ensure workplace inspections are being conducted and records kept identifying and preventing potential non-conformities and corrective actions.
- Ensure pre-use inspections of vehicles, machines, tools, and equipment are being conducted and records kept identifying and preventing potential non-conformities and corrective actions.
- Establish inspection frequencies and who is responsible to conduct them.
- Ensure reports are kept in a manner consistent with our Documents and Records policy and
- Develop new procedures to control or eliminate hazards identified through Workplace Inspections.
- Review inspection reports, prioritizing actions to correct any identified deficiencies.
- Ensure identified deficiencies are corrected in a timely manner.
- Ensure inspections are being performed regularly as required and are recorded by this program.
- Involve workers regularly during the inspection process.

### Supervisor

- Document, at least weekly, workplace inspections making safety observations on employees, the work tasks, and the site conditions.
- Conduct and keep records for workplace inspections including identifying and preventing potential non-conformities and corrective actions.
- Communicate site inspection results to the workers working at the time of the inspection and ask the workers for feedback on inspection results and action taken.
- Conduct and keep records for pre-use inspections of vehicles, machines, tools, and equipment including corrective actions.
- Routinely talk to the workers, at the time of the inspection, on inspection results, their questions, and health and safety trends, and changes in industry practices etc.
- Rectify and document safety infractions encountered during inspections and corrective actions taken.
- Ensure identified deficiencies corrected in a timely manner.
- Ensure maintenance records and Operator/Maintenance Manuals are available as prescribed.
- Ensure reports are kept in a manner consistent with our Documents and Records policy.
- Post site inspection reports on site or where a bulletin board is not practical, in the on-site H&S binder.

### Workers

- Review and sign-off on Pre-site Inspections and Supervisor Inspections
- Perform pre-use inspections and document inspections as required by this policy.

- When recording inspections, use the required forms and fill them out completely.
- Report any deficiencies to the supervisor.
- Do not use any equipment that has exceeded scheduled maintenance.
- Give your full cooperation to Inspectors.
- Submit all required documentation to the supervisor.

#### **H&S/Operations Coordinator**

- Assist management in the implementation of this Policy and Procedure.
- Ensure workplace inspections are being conducted and records kept identifying and preventing potential non-conformities and corrective actions.
- Ensure pre-use inspections of vehicles, machines, tools, and equipment are being conducted and records kept identifying and preventing potential non-conformities and corrective actions.
- Ensure reports are kept in a manner consistent with our Documents and Records policy

#### **H&S Representative / JHSC Member**

- Be consulted on and make recommendations concerning this policy.
- Ensure reports are kept in a manner consistent with our Documents and Records policy.

#### **Subcontractor**

- Ensure their workers always work in compliance with this policy.
- Perform and document inspections in accordance with the manufacturer's instructions, this policy, and legislated requirements.
- Submit all site inspection results to the site supervisor.

#### **Pre-Use Inspections**

C&M Electric will conduct and keep records of pre-use inspections of vehicles, machines, tools, and equipment including corrective actions. This will be accomplished by conducting pre-use inspections prior to use for the first time that day. It will be the responsibility of individual workers to check the inspection log and determine if it has been inspected previously that day. If equipment is used several times a day, only one-pre-use inspection is required on any given day. In cases where equipment is not used daily, a pre-use inspection is not necessary until the day it is used.

Random checks will be performed by the supervisor to ensure that, prior to the use of any vehicle, machine, tool or equipment, pre-use inspections are completed as required. Where identified, inspection results will be recorded on standard forms/checklists developed by C&M Electric for the specific vehicle, machine, tool, or equipment. The requirements for visual and/or documented inspections will be identified in the Work Task Manual. The vehicle, machine, tool, and equipment owner's manual will be consulted to ensure that the requirements of the manufacturer are being met.

Wherever possible, pre-use inspection forms will be kept with the vehicle, machine, tool, or equipment or within proximity and completed pre-use inspections readily available for review. Supervisors will be held accountable for identifying site vehicles, machines, tools, and equipment that are to be inspected and to ensure that required pre-use inspection are completed using the pre-use Inspection forms. The worker conducting the pre-use inspection will complete the inspection, date, and sign it and return it to the appropriate location. Completed inspection forms/books will be submitted to the supervisor and a new inspection form/book will be provided. In the event that a deficiency is found during the pre-use inspection, the worker will determine if it is a minor issue that the worker can correct prior to use. If the deficiency is of a nature that the worker cannot correct it to make the equipment safe to use, then the worker will ensure the equipment is tagged and taken out of service and ensure that the supervisor is notified immediately. Management will file, either as hard

copies or electronically, all inspection forms/checklists.

### **Legislative and Manufacturer Requirements**

C&M Electric will make every effort to ensure that workplace inspections meet all legislation and manufacturers requirements. This will be accomplished through:

- Consulting with the vehicle, machine, tool, and equipment owner's manual to ensure that the requirements of the manufacturer are being met.
- Requiring pre-use visual inspections at a minimum for all tools where no recommendation is given.
- Including the inspection of emergency Equipment during the Supervisor Workplace Inspection. Emergency equipment will include but not be limited to:
  - o Fire extinguishers
  - o First Aid Kits
  - o Eye wash bottle/station
- Consulting with the master list of vehicles, machinery, equipment, and tools requiring regular inspection.
- Consulting the Ministry of Labour, Training and Skills Development website periodically, but at least annually, for regulation updates and taking necessary action in compliance with our Change Management procedures to ensure all affected parties are informed of the changes and to ensure adequate training where required.

### **Inspections**

C&M Electric will be responsible to identify what must be inspected. In accordance with legislative requirements, C&M Electric will follow the procedures listed below:

- Unless otherwise required by the regulations or by an order by an inspector, health and safety representatives will inspect the workplace at least once a month. R.S.O. 1990, c. O.1, s. 9 (26).
- Subject to subsection (24), the members of a committee who represent workers shall designate a member representing workers to inspect the physical condition of the workplace. R.S.O. 1990, c. O.1, s. 9 (23).
- If it is not practical to inspect the workplace at least once a month, the member designated under subsection (23) shall inspect the physical condition of the workplace at least once a year, inspecting at least a part of the workplace in each month. R.S.O. 1990, c. O.1, s. 9 (27).
- An inspection shall be made at least once a week or more frequently as the supervisor determines is necessary to ensure that the machinery and equipment referred to in subsection (3) do not endanger any worker. O. Reg. 213/91, s. 14 (4).

C&M Electric further requires the following inspections to be completed on eCompliance by the appropriate personnel:

- Pre-Site Inspections completed daily by the Supervisor.
- Supervisor Inspections completed weekly by the Supervisor on sites with 5 or more workers.
- Toolbox Talks completed weekly by the Supervisor on sites with 5 or more workers.
- Third Party Inspections completed by the H&S Consultant on sites with 5 or more workers.

As all inspections are completed and stored on eCompliance, the H&S Coordinator will review the database weekly to ensure that the required personnel are complying to the inspection requirements. If issues are identified, the H&S Coordinator will send the individual a reminder. If the issue persists following the reminder, Senior Management will be notified and will issue a verbal warning. If the individual continues to not comply, disciplinary action will be taken.

### **Communicating Inspection Results**

The following process is utilized when communicating the inspection results of PSI's and Supervisor Inspections to relevant workplace parties:

1. The Foreman conducts the inspection and shares results with all workers on site who are required to sign-off.
2. The Foreman submits the inspection to the H&S Coordinator who reviews the inspection and signs-off.
3. At the weekly meeting with Senior Management, the H&S Coordinator reviews inspection results and presents any safety infractions or issues.

In regard to monthly Third-Party Inspections, the H&S Consultant will email the results to the H&S Coordinator who distributes the results to the Project Manager and Senior Management.

### **Deficiencies or Unsafe Conditions**

If deficiencies are found during an inspection, it should be indicated on the inspection form and the appropriate corrective actions must be taken.

If the inspection reveals unsafe conditions, practices or procedures, the supervisor must:

- Act immediately to rectify the problem if possible.
- If unable to rectify the problem, cease work, reassign workers, if possible, notify management and not allow work to resume until the hazard has been eliminated or controlled.
- Complete the inspection form to include the date, action taken and the results.

If the supervisor is unable to rectify the situation, they are to stop work and report to management. Senior management will review inspection reports, prioritizing actions to correct any identified deficiencies and providing resources as needed within 48 hours. In the case that 48 hours is unachievable, an action plan will be created by Senior Management in consultation with the H&S Coordinator and Supervisor.

### **Training**

Senior Management will ensure that affected employees receive adequate training to ensure the effective implementation of this policy. Training on workplace inspections will be provided to employees through safety meetings, one-on-one training or through organized and topic- specific trainings or by any other means when and where necessary.

### **Record Keeping**

All documents and records generated by the implementation of this policy, will be kept on file per the procedure outlined in the Document and Record Control.

### **Communication**

This policy will be communicated to all employees by way of meetings, safety talks, or any other method deemed effective by management.

### **Evaluation**

This policy will be evaluated at least annually by management to ensure it is being fully implemented and it is effective. Any changes to the policy will be communicated to the appropriate parties.

# Investigation and Reporting

## Policy Statement

C&M Electric is committed to establishing, implementing, monitoring, and maintaining a documented policy statement and procedure for reporting and investigating incidents.

The procedure requires:

- Roles and responsibilities of workplace parties pertaining to the reporting of accidents and incidents, including near misses, the conducting of investigations in a timely manner and the implementation of corrective and preventive actions as a result of the investigations.
- Employees to be trained in legislative and company specific reporting requirements and investigation procedures.
- Action be taken to mitigate any additional consequences of the incident.
- The determination of health and safety deficiencies including root causes of the incident.
- The determination of corrective and preventative actions.
- Communication of investigation results, corrective, and preventative actions to relevant parties.
- A process measuring the effectiveness of the corrective and preventative actions.
- The maintenance of records of incidents and investigation reports.

A standard investigation form will be used uniformly throughout C&M Electric to record incident investigations. Completed forms will be retained per the document and record keeping policy. Workers will be made aware of reporting procedures. Supervisors will be trained in accident investigation and reporting procedures.

Corrective and preventive actions will be implemented in a timely manner and will be monitored to ensure effectiveness.



**Ken Crawford**  
President, C&M Electric  
January 31, 2023



## Procedure

It is the policy of C&M Electric to ensure that all incidents and accidents are reported. To accomplish this task, an investigation and reporting policy and procedure has been developed to ensure comprehensive investigations are conducted to determine the cause of accidents, incidents and near misses for the purpose of establishing controls to prevent reoccurrence.

## Definitions

Incident – An event that results in injury to people and/or damage to the environment, equipment, property and/or material.

Accident – An event that results in injury to people that requires medical attention and/or serious damage to the environment, equipment, property and/or material.

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.

Near Miss – An event that under different circumstances could have resulted in physical harm to an individual or damage to the environment, equipment, property and /or material.

Competent Person – A person who, because of knowledge, training, and experience, has the acquired skills to organize specific activities and is familiar with the Occupational Health and Safety Act and applicable Regulations.

Corrective action – Action taken to eliminate the causes of non-conformities, incidents, accidents, near misses or other undesirable situations to prevent recurrence.

Preventive action – Action taken to prevent the occurrence of undesirable situations, such a training, JHA, etc.

Critical Injury – As defined in Ontario Regulation 420/21, critical injury is an injury of 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, causes the loss of sight in an eye.

Medical Attention – Means treatment from a legally qualified medical professional.

## Forms

C&M Electric uses the following forms for Incident Investigation and Reporting:

Accident Investigation Package	INV2 A F1
Corrective and Preventative Action Plan	INV F 01
Enforcement Notification	CR2 A F1
First Aid Treatment Logs	EP2 A F2
Incident Report	WI3 A F3
Medical Treatment Package	EP2 A F4
Return to Work Coordinator Package	RTW2 A F1
Vehicle Incident Report	INV2 A F2
Violence and Harassment Report	VH2 A F1

## Responsibilities

### Senior Management

- Ensure workplace parties report incidents, accidents and near misses and ensure investigations are conducted in a timely manner.
- Conduct an immediate investigation of reported incidents, accidents and near misses that includes the description of the incident, any evidence collected during the investigation, an explanation of the causes of the incident, and corrective and preventive actions.
- Assemble an investigation team that may include but not be limited to workers, witnesses or bystanders, supervisor,

management representatives, the H&S representative or committee members, and our H&S coordinator.

- Develop new procedures to control or eliminate the chances of an incident/accident being repeated.
- Ensure employees who will, and those who may, be required to be part of an investigation are provided training in legislative and company specific reporting requirements and investigations procedures.
- Take action to mitigate any additional consequences of the incident.
- When investigations are conducted take every measure possible to determine health and safety deficiencies and to determine the root causes of accidents, incidents, and near-misses.
- Ensure reporting to the relevant authorities, as required.
- Review, on a regular basis, all incident, accident, and near-miss reports.

### **Supervisor**

- Ensure injured workers receive adequate medical attention.
- Take immediate action to ensure the protection of other workers and notify management.
- Secure the accident scene and preserve the evidence until the investigation is completed by the required parties.
- Assist with investigations and ensure the Accident/Incident Investigation Package is completed.
- Communicate any changes in policy and/or procedures to the workers in a timely manner.
- Monitor procedure changes to ensure that the new procedures are effective in controlling the hazards.
- Ensure workers report incidents, accidents and near misses and ensure that they are investigated in a timely manner.
- Ensure workers are trained in legislative and company specific reporting requirements.
- Take action to mitigate any additional consequences of the incident.
- Take every measure possible to determine H&S deficiencies and to determine the root causes of accidents, incidents, and near-misses.

### **Workers**

- Report incidents, accidents and near misses to supervisor immediately.
- Obtain medical attention as required and report such treatment to the supervisor.
- Do not disturb the scene of an accident, unless to do so would endanger others or cause damage to property.
- Cooperate with the accident or incident investigation, as required.
- In the event of injury, follow all company policies and procedures regarding return to work and reporting.

### **H&S / Operations Coordinator**

- Assist Senior Management with the implementation of this Policy and Procedure.
- Assist in incident or accident investigation, as required.
- Draft and communicate any company wide documentation post-incidents.

### **H&S Representative / JHSC Member**

- Included as part of investigation team investigating an accident or incident.
- Be consulted on and make recommendations concerning this policy and procedure.

### **Subcontractors**

- Ensure their workers always work in compliance with this policy and procedure.
- Report all accidents, injuries, near-misses etc. to the C&M Electric site supervisor.

- Participate in completing forms and reports as directed.

### Legal Duty to Report

Some incidents, accidents or occupational illnesses must be directly reported to the Ministry of Labour, Training and Skills Development. All notices and reports will be submitted as required by applicable regulation including the Occupational Health and Safety Act and Ontario Regulation 420/21.

### Notification and Reporting Procedure and Responsibilities

Near miss: Notification and Reporting	
Responsibility	Action
Employees	<ul style="list-style-type: none"> <li>- Immediately report all work-related incidents including near misses, injuries, illnesses, property damage, environmental incidents, and motor vehicle incidents to the Supervisor.</li> </ul>
Supervisors	<ul style="list-style-type: none"> <li>- Educate team on proper reporting procedures</li> <li>- Record the incident using Near Miss Investigations Report and submit the report to Management.</li> </ul>
Management	<ul style="list-style-type: none"> <li>- Provide a copy of the report to JHSC.</li> </ul>
JHSC	<ul style="list-style-type: none"> <li>- Participate in the incident investigation process</li> <li>- Review all incident Reports and submit recommendations</li> </ul>
Incident or Accident: Notification and Reporting	
Employees	<ul style="list-style-type: none"> <li>- Immediately report all work-related incidents including near misses, injuries, illnesses, property damage and environmental incidents to the Supervisor.</li> <li>- Not disturb the work area where the accident has occurred</li> <li>- Complete the Injured Employee Forms (WSIB Form 8 and FAF form or the provincial equivalent) and return it to Management the next working day.</li> </ul>
Supervisors	<ul style="list-style-type: none"> <li>- Educate team on proper reporting procedures</li> <li>- Ensure injured employees receive adequate medical care.</li> <li>- Take immediate action to ensure the protection of other employees and notify management.</li> <li>- Give the employee: Functional Abilities Form and WSIB form 8.</li> <li>- Perform an investigation of the accident scene. If available, include the injured employee in the investigation process</li> <li>- Complete WSIB's employer's report of injury (form 7).</li> <li>- Record the accident using Supervisor Incident - Accident Investigation Report and submit the report to Management within 24 hours of the accident.</li> </ul>

Management	<ul style="list-style-type: none"> <li>- Provide a copy of the report to the JHSC.</li> </ul>
JHSC	<ul style="list-style-type: none"> <li>- Participate in the incident investigation process.</li> <li>- Review all accident Reports and submit recommendations.</li> </ul>

### Critical Injury: Notification and Reporting

Employees	<ul style="list-style-type: none"> <li>- Immediately report all work-related incidents including near misses, injuries, illnesses, property damage and environmental incidents to the Supervisor.</li> <li>- Not disturb the work area where the accident has occurred</li> <li>- Complete the Injured Employee Forms (WSIB Form 8 and FAF and return it to Management the next working day.</li> </ul>
Supervisors	<ul style="list-style-type: none"> <li>- Educate team on proper reporting procedures</li> <li>- Ensure that the emergency services have been notified</li> <li>- Ensure injured employees receive adequate medical care.</li> <li>- Take immediate action to ensure the protection of other employees and notify management.</li> <li>- Give the employee: Functional Abilities Form and WSIB form 8.</li> <li>- Secure the accident scene by erecting a barrier or cordoning off an area preventing access</li> <li>- If a piece of evidence must be moved, then a picture or representative drawing will be taken to record the actual layout of the area</li> </ul>
Management	<ul style="list-style-type: none"> <li>- Immediately notify the JHSC and Ministry of Labour, Training and Skills Development and advise of accident 1-877-202-0008</li> <li>- Ensure a proper investigation team is created, at minimum the HSR and Supervisor, to perform an accident investigation. All evidence and information shall be gathered to discover the root cause of the accident. After the information is gathered, the Manager with the HSR will analyze it and make known their findings and recommendations to avoid a recurrence or related accident or incident.</li> <li>- Submit a written report of the occurrence within 48hrs to the Ministry of Labour, Training and Skills Development using the Accident Investigation Report - Critical Injury or Fatality form.</li> </ul>
JHSC	<ul style="list-style-type: none"> <li>- Participate in the incident investigation process.</li> <li>- Review all accident Reports and submit recommendations.</li> </ul>

### Occupational Illness: Notification and Reporting

All	<ul style="list-style-type: none"> <li>- If an employee (current or former) has an occupational illness, or a claim for an occupational illness has been filed with the Workplace Safety and Insurance Board, Management must notify, in writing, within 4 days of being advised: <ul style="list-style-type: none"> <li>✓ Director of the Ministry of Labour, Training and Skills Development</li> <li>✓ JHSC</li> </ul> </li> <li>- The notice should include: <ul style="list-style-type: none"> <li>✓ the name, address, and type of business of the employer</li> <li>✓ a description of the occupational illness and what may have caused it</li> <li>✓ the period when the employee was affected</li> <li>✓ the name and address of the employee affected</li> <li>✓ name and address of the physician or other medical practitioner, if any, who was or is attending to the person for the illness</li> <li>✓ the steps taken to prevent further illness</li> </ul> </li> </ul>
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### Incident or Accident Procedure

In the event of an incident or accident, the primary concern is ensuring the worker who is injured receives medical attention and that no other workers will be hurt.

The supervisor will work closely with fire, police, and other agencies to ensure the site is safe and secure and that all immediate hazards are addressed. If needed, a Stop Work Order will be issued, so that work cannot resume at the site until it is determined that all workers are safe.

Whenever possible the accident scene must be secured to preserve evidence for the investigation team or authorities to fully investigate. This will not apply when the following conditions require disturbance of the scene:

- To save a life or to relieving human suffering.
- To maintain an essential public utility service or public transportation system.
- To prevent unnecessary damage to equipment or other property.

To ensure the accident scene is not disturbed, it will be secured and all work activity in this area will cease until the investigation is complete.

The investigation team will be engaged which may include the supervisor, injured worker, member from upper management, H&S Representative / JHSC Member and third-party investigator, if required.

The key role of the team is to collect facts, data, and any evidence, while establishing the sequence of events that led up to the event that caused the investigation. The team will also analyze the information and develop any findings into a report. C&M Electric will take all reasonable steps to ensure a person's right to privacy and will keep all aspects of the accident as reported or witnessed during the investigation confidential. Senior Management will ensure that all interview notes and C&M Electric's investigation will be filed at a location where there will be limited access.

When investigating an accident, the investigation team will consider 1) the people directly or indirectly involved in the accident 2) the equipment involved, 3) the materials involved, 4) the work environment considering both physical factors and human factors, and 5) the work processes involved. Investigations will consist of four steps:

- Collecting Information
  - o Investigation team will conduct interviews, take witness statements, and write worker report(s).
- Reviewing the Scene
  - o Investigation team will take photographs, draft sketches, review documents, etc.
- Identifying Contributing Factors
  - o Investigators will consider the people, equipment, materials, environment and policies and procedures which may have contributed to the accident.
- Writing the Report
  - o All reports will be written using C&M Electric's Accident Report form and submitted to management. The report will include OSH deficiencies including the root cause and the corrective and preventative action plan which recommends the implementation of controls to ensure the accident/incident is not repeated. The findings of the investigation will be communicated to the relevant parties.

As a result of accident investigation, the Investigation Team will recommend to Senior Management corrective actions that should be taken to fix the cause of the accident. In addition, the team may further make preventative action recommendations to prevent the recurrence of a similar accident. To ensure that corrective and preventative actions are implemented, the Investigation Team will complete the Corrective Action/Preventative Action (CAPA) Effectiveness Plan which includes:

- Person responsible for the CAPA effectiveness check
- Frequency and amount of checks
- Location of the check
- How effectiveness will be measured
- Method for verifying effectiveness
- Findings

The person identified as responsible will then complete checks as per the CAPA Effectiveness Plan to ensure that the measures to prevent reoccurrence are being adhered to on-site.

### **Incident Investigation Package**

All accident and incident investigations will be recorded using our Incident Investigation Package. The package will:

- Be readily available on site.
- Include the name and address of the constructor.
- Include the name, address, and type of business of the employer.
- Include the name of the person completing the Investigation Form, the name of the supervisor and the names of those involved in the accident investigation.
- Include the name address and phone # of the injured, those involved and witnesses.
- Include the nature and circumstances of the occurrence and the bodily injury sustained by the person.
- Include a description of the machinery or equipment involved.
- Include the time and place of the occurrence.
- Indicate if the accident resulted in first aid treatment, lost time, health care and/or critical injury.
- Include a description of where the accident occurred.
- Include a description of property damage if applicable.

- Include a description of first aid/medical treatment received by whom and where or nature of the illness.
- Include the contributing factors involved in the accident.
- Include corrective actions to ensure the accident will not be repeated to include:
  - Date and time when actions are to be implemented.
  - Person(s) responsible for implementation.
  - Person responsible for follow up.
- Statements by witnesses to include:
  - Name, phone number, address of the witness(s) and printed name with signature and date.
  - Name and phone number of the interviewer and printed name with signature and date.
  - Details either written by the witness or dictated by the witness.

### **Procedures for Reporting a Company Vehicle Accident**

In the event of a vehicle accident the following procedures should be followed:

- Stay calm, park safely.
- Assess the situation – evaluate worker medical condition. Avoid unnecessary movement as neck, spine or back injury may have occurred.
- Use warning devices or signals available, if any.
- Call local police or 911. Request a police accident report, no matter how minor the accident is.
- Be courteous. Answer police questions. Share any required information with the other party involved, if any.
- Provide any First Aid, if physically able and certified.
- Protect yourself and the vehicle from further injury or damage, if physically able.
- Direct traffic around accident scene; move vehicle from roadway, when directed; position yourself away from vehicle, if vehicle cannot be moved, etc.
- Report the accident to supervisor.
- Provide any information as required including operator number, license number and registration.
- Discuss the accident only with police or emergency services, avoid communication with other driver(s) or witnesses.
- Ensure all witnesses remain on scene to give witness information.
- Comply with completing all legal paperwork, if any.
- Document the accident using C&M Electric's Vehicle Accident Report.

### **Implementing and Measuring Corrective and Preventive Measures**

The investigation following any incidents or accidents will focus on corrective and preventative measures that will be put in place to prevent the incident from recurring. The process to implement and measure corrective and preventative actions is:

- Identify the need: Determine the issue triggering the corrective and preventive action (i.e., incident or accident).
- Promptly identify and document the problem: C&M Electric will investigate the incident to determine the root cause.
- Implement a temporary action or repair, if required: While the investigation is ongoing actions may be required to correct, contain or repair the issue temporarily.
- Find the cause of the issue: Investigate the incident and determine what events, processes, systems, etc. contributed to the event to determine the root cause of the issue.
- Determine the solution that will prevent a recurrence: Corrective and preventative actions will be identified which may include new parts, process, procedures, or system changes to prevent a recurrence of the problem.
- Verification: Verify that the corrective and preventative action continues to be effective and that the problem does not recur.

### **Training**

Employees who will, and those who may, be required to be part of an investigation will be required to complete a Basics of Supervising course to gain knowledge of legislation and reporting requirements. Workers will also be required to complete a company specific reporting requirements and investigations procedures outlining C&M Electric's specific requirements as outlined in this policy. Certified Members of the JHSC will be required to complete the Part I and II certification courses which outline their duty regarding accident and incident investigation.

### **Record Keeping**

All documents and records generated by the implementation of this policy, will be kept on file per the procedure outlined in the Document and Record Control.

### **Communication**

Senior Management will incorporate one or more communication channels mentioned in the Communication Policy and Procedure, to communicate investigation results the Corrective/Preventative Action Plan to relevant parties. This policy will be communicated to all employees by way of meetings, safety talks, or any other method deemed effective by management. The chosen method of communication will include preventative measures to prevent reoccurrence. The Incident Investigation package includes a Notice of Occurrence form, which is to be completed and submitted to the MLSTD within the time guidelines set out.

### **Evaluation**

The Investigation Team will monitor situations where corrective actions have been implemented to ensure desired results are being obtained and to ensure the controls are not creating new hazards. Determining the effectiveness of the corrective actions will be accomplished by conducting a site audit within sixty days of the incident. Records will be kept of all incidents and all investigation reports will be reviewed and evaluated at least annually as to the effectiveness of corrective and preventative actions.



# Emergency Preparedness

## Policy Statement

C&M Electric is committed to establishing, implementing, monitoring, and maintaining a policy and procedure for emergency prevention, preparedness, and response.

The procedure will require:

- Identification of potential emergency situations.
- Documented response plans including roles and responsibilities of relevant personnel.
- Input from relevant interested parties.
- Identification of resources needed to implement the emergency response plans taking into consideration the needs of other interested parties.
- Emergency equipment to be in place, well-marked and regularly inspected and maintained.
- Prevention or minimization of injury or illness for identified emergency situations.
- C&M Electric to provide adequate first aid which includes first aid supplies and qualified first aiders.
- An appropriate emergency communication system be in place.

Emergency response training will be provided to managers, supervisors and workers outlining their roles and responsibilities in emergency planning. Communication of relevant information to all involved including workers, visitors, contractors, emergency response services, government authorities and the community regarding emergency response.

Site Specific Safety Plans (SSSPs) are created for each project and include the emergency response procedures for each individual work site. Workers will follow all client or constructor emergency response procedures when working on a site or client location.

An Emergency Response Plan (ERP) has been created for our main office location. The ERP will be reviewed at least annually, with appropriate revisions made. A test or drill will be conducted annually at head office to ensure workers are aware of their duties in emergency response.

The appropriate number and type of fire extinguishers and first aid kits will be provided as required in marked locations. Workers will have the required training or certification to operate emergency equipment. Emergency response equipment will be regularly inspected and maintained according to the manufacturer's requirements.



**Ken Crawford**  
President, C&M Electric  
January 31, 2023

## Procedure

It is our goal as a company to prevent, as far as reasonably practical, an emergency from occurring. This will involve, but not be limited to recognizing potential emergency situations prior to the start of a project, identifying hazardous materials and processes required on the project, ensuring workers are aware of their emergency procedures roles and responsibilities and ensuring workers are adequately trained in the procedures required to prepare a written Site-Specific Safety Plan (SSSP) or Emergency Response Plan (ERP).

## Definitions

Emergency Response - Is the actions taken to manage, control, or mitigate the immediate effects of an incident.

Emergency Response Plans (ERP's) – Is a documented plan outlining the actions to be taken by individuals to mitigate the damage of potential events that could endanger a worker.

First Aider – An individual who provides immediate medical care and who is trained and certified to give first aid.

Health Care Provider - A person who is licensed to provide medical treatment, such as a doctor, nurse, etc.

Competent Person - A person who, because of knowledge, training, and experience, has the acquired skills to organize specific activities and is familiar with the Occupational Health and Safety Act and applicable Regulations

## Forms

C&M Electric uses the following forms for Emergency Preparedness:

First Aid Kits Inspection Log	EP2 A F1
Site Specific Safety Plan	HA1 A F1
Accident Investigation Package	INV2 A F1
Corrective and Preventative Action Plan	INV F 01
Enforcement Notification	CR2 A F1
First Aid Treatment Logs	EP2 A F2
Incident Report	WI3 A F3
Medical Treatment Package	EP2 A F4
Return to Work Coordinator Package	RTW2 A F1
Vehicle Incident Report	INV2 A F2
Violence and Harassment Report	VH2 A F1

Additional information includes fire extinguishers annual and monthly inspections and Emergency Response Plan (ERP) for our main office.

## Responsibilities

### Senior Management

- Ensure SSSP's are developed to identify potential emergency situations and the response plan.
- Develop an Emergency Response Plan (ERP) for head office.
- Ensure Emergency Response Plan (ERP) is documented and includes the roles and responsibilities of relevant employees during emergencies.
- When developing SSSP's or ERP, input from relevant interested parties will be incorporated.
- Ensure adequate emergency equipment is available on-site and that it is well- marked and regularly inspected and maintained.
- Ensure plans are developed with the sole purpose of minimizing injuries and illnesses for identified emergency situations.

- Ensure plans include first aid requirements and address first aid stations, the availability of qualified first aiders and ensuring adequate first aid supplies.
- Ensure workers receive adequate training on emergency response, including fire extinguisher, first aid, etc.
- Ensure workers receive transportation to medical facilities, when required.
- Ensure all facilities and work sites are equipped with an adequate means of communication in the case of an emergency. This may include phones, air horns or other equally effective means of communication.
- Ensure ERP is periodically tested and that records of testing and corrective actions, if any, are kept and maintained.
- At least annually, ensure emergency procedures and response plans are reviewed and where necessary, make revisions.
- Ensure ERPs and relevant information are communicated to all relevant persons including workers, visitors, contractors and where applicable to emergency response services and government authorities.
- Post or have available a list of emergency telephone contact numbers at every job site.
- Ensure all workers have knowledge about our ERP and SSSPs.
- Ensure supervisors are competent and knowledgeable about emergency response.

### **Supervisor**

- Ensure assessments of all workplaces to identify hazards and potential emergency situations.
- Ensure SSSPs are posted and available onsite.
- Ensure emergency equipment is regularly inspected and maintained.
- Ensure first aider(s) are available on site in compliance with regulations.
- Ensure workers receive adequate transport to medical facilities, if required.
- Ensure the sites are equipped with an adequate means of communication in the case of an emergency.
- Ensure workers are trained as required to ensure they can perform their roles with respect to the emergency response.
- Ensure relevant information is communicated to all relevant persons to include workers, visitors, contractors.
- Ensure specific forms relevant to emergency response are completed, including inspection of equipment.
- Ensure all emergency equipment is in place as outlined in the SSSP.
- Ensure the adequate supply of emergency equipment and its corrective action as per the SSSP.
- Ensure that emergency equipment is inspected regularly.
- Designate a meeting spot where workers will meet and be accounted for in the event of an emergency.

### **Worker**

- Attend all training, safety talks and other information activities required.
- Report all emergency situations to the supervisor.
- Follow the procedures outlined in this policy and/or directions of those with designated responsibilities.

### **H&S / Operations Coordinator**

- Assist with arranging and documenting training on emergency response procedures.
- Responsible for coordinating and recording the annual emergency response drill.
- Assist management with the implementation of this policy and program.

### **H&S Representatives and/or JHSC**

- Be consulted on and make recommendations concerning this policy.

### Subcontractor

- Ensure workers always work in compliance with this policy.

### Annual Emergency Response Plan (ERP) Drill at C&M Electric Head Office

Our main office, located in Carp has an Emergency Response Plan (ERP) which has been developed outlining the emergency procedures to follow for workers and staff in the office. At least annually, an emergency drill will be conducted at the head office to determine if existing procedures are in place remain adequate or if the procedures need to be revised to better prepare for emergencies. When required, revised emergency plans will be posted and/or made readily available to the workers.

### Site Specific Safety Plans (SSSPs) for Project Site Locations

Site specific emergency plans will be done prior to the commencement of work on a project, a site-specific assessment will be completed to identify potential emergency situations. Assessments will be used to ensure that procedures are in place, to better prepare for emergencies. The responsibilities of the Project Manager, Supervisor, H&S Coordinator, First Aider and workers in the event of an emergency will be identified in the site-specific emergency plans. Emergency plans will be included in the project Site Specific Safety Plan (SSSP) and will be reviewed and updated as often as required, but at least annually on longer duration projects.

### Emergency Equipment

Emergency response equipment, such as first aid kits, eye wash stations, and fire extinguishers, will be provided at readily accessible and well-marked locations to allow for the successful execution of the ERP. First aid emergency equipment will be supplied in accordance with regulation. Emergency response equipment including first aid kits, eye wash stations and ladders will be inspected weekly as part of the supervisors weekly site inspection process and monthly by the H&S Representative or JHSC member as part of their inspection responsibilities. The H&S Coordinator will monitor adherence to the inspection requirements through eCompliance. If it is found that emergency response equipment is not available, or is not capable of functioning as required, the inspector will make arrangements immediately, to have the deficiencies corrected or to arrange for the placement of the missing equipment.

Fire Extinguishers	<ul style="list-style-type: none"> <li>• Every worker who may be required to use fire extinguishing equipment will be trained in its use.</li> <li>• Fire extinguishers will be located within quick and easy access for workers in the workplace.</li> <li>• Fire extinguishers will be provided and kept in close proximity in the following situations:             <ul style="list-style-type: none"> <li>○ Where flammable liquids or combustible materials are stored, handled, or used.</li> <li>○ Where oil-fired or gas-fired equipment is being used.</li> <li>○ Where welding or open-flame operations are carried on.</li> <li>○ On each story of an enclosed building being constructed or altered.</li> <li>○ The location of fire extinguishers will be adequately marked for easy location.</li> <li>○ Supervisors will ensure workers under their direct supervision are aware of the site-specific evacuation routes in case of an emergency.</li> <li>○ Fire extinguishing equipment will be of a suitable type and size to permit the evacuation of workers during a fire.</li> <li>○ Training may be performed in-house or by a 3rd Party.</li> <li>○ Fire extinguishers will be inspected for defects or deterioration at least monthly by a competent worker who will record the date of the inspection on the tag attached to it. If the fire extinguisher indicates it is NOT charged immediately remove it from service and replace with a fully functioning fire extinguisher.</li> </ul> </li> </ul>
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	<ul style="list-style-type: none"> <li>○ Monthly inspections will be recorded on the inspection tag provided with the fire extinguisher.</li> <li>○ A third-party technician will perform annual inspections. Records of the date of inspection and name of the inspector will be logged and kept within the first aid kit.</li> <li>○ After a fire extinguisher is used, it will be recharged or replaced immediately.</li> </ul>
Eye Wash Stations	<ul style="list-style-type: none"> <li>● Eye wash stations/bottles will be provided as required.</li> <li>● Eye wash stations/bottles will be in the vicinity of the first aid kit.</li> <li>● Supervisor will ensure eye wash stations/bottles are inspected regularly.</li> <li>● Eye wash bottles will be filled with saline and will be protected by a secure lid.</li> <li>● All workers will immediately flush the eye as directed.</li> </ul>
First Aid Kits	<ul style="list-style-type: none"> <li>● First Aid Kits will be located on each job site and in the office.</li> <li>● Locations of first aid kits will be identified on project site plans.</li> <li>● It is the responsibility of the supervisor to ensure First Aid kits are located within quick and easy access for all workers and in the vicinity of a certified first aider.</li> <li>● First Aid kits will be manned by qualified first aiders. It is the H&amp;S Coordinator's, or their delegates, responsibility to track first aid training status, to ensure an adequate number of first aiders are available within C&amp;M Electric.</li> <li>● It is the responsibility of the supervisor, or the person in charge of the first aid kit, to inspect and restock its original contents at least four times a year. Records of the date of inspection and name of the inspector will be logged and kept within the first aid kit.</li> <li>● Periodically, but at least annually, the H&amp;S Coordinator, or their delegate, will review first aid training records to ensure first aiders have adequate and current training.</li> <li>● Project managers will identify the first aider assigned to a project in the Site-Specific Safety Plan.</li> <li>● Workers will report to the qualified first aider on site, all injuries, requiring treatment.</li> <li>● Copies of First Aid certification will be posted on each project.</li> </ul>

### **Emergency Procedures Involving Critical Injuries or Fatalities**

In the event of a critical injury or fatality, the following list covers basic actions to be taken. The supervisor will arrange for immediate medical treatment to be provided. Management will notify the client and/or constructor. The supervisor will ensure an accident investigation is conducted and prepare a detailed report of the event.

Workers will cooperate with the investigation process. Workers are to direct media questions to a spokesperson designated by upper management. In the case of a fatality, it will be the responsibility of the Police to notify the next of kin. The scene must be left as is and cannot be disturbed. Upper management will notify Government Authorities, as required.

### **Emergency Procedures Involving Medical Injuries**

#### **General First Aid Procedure**

The supervisor will take the necessary steps to ensure the hazard causing the injury is either eliminated or controlled. Notify management, the H&S Coordinator, or their delegate, and, when applicable, the Health and Safety Rep. of the situation. Ensure the injured worker is not left unattended. Arrange immediate transportation of the worker to the nearest hospital or medical clinic. If possible, accompany the worker to the hospital or clinic or, if not possible, arrange for someone to accompany the worker. Provide the injured worker with a company Medical Treatment Package for Injured Workers. If the injury is such that the worker requires medical treatment, the supervisor should consider the event an incident and complete the Accident/Incident Investigation Report.

The First Aider will take the appropriate actions based on their level of training and send someone to notify the supervisor immediately. When required, send someone to meet EMS and direct them to the site of the accident. Continue to administer first aid until relieved by an Emergency Medical Service worker. Record the date, time, names of witnesses, and the type and location of the injury on the Treatment Record provided with the first aid kit. If the first aid kit does not have a Treatment Record form, the First Aider will complete the Treatment Record located in the on-site Health and Safety Binder.

The worker will obtain first aid promptly and notify the supervisor immediately. If necessary, the worker will be accompanied to hospital or clinic by designated individual. If medical treatment is required, complete the required paperwork for incident reporting and WSIB. Return the completed package to the office or to the supervisor as soon as possible.

### **Emergency Procedures Involving Fire Extinguishers**

All workers who may use a fire extinguisher will receive adequate training on their use. Fire extinguishers to be located within quick and easy access for workers in the workplace. Fire extinguishers will be provided and kept in proximity in the following situations:

- Where flammable liquids or combustible materials are stored, handled, or used.
- Where oil-fired or gas-fired equipment is being used.
- Where welding or open-flame operations are carried on.
- On each story of an enclosed building being constructed or altered.

The location of fire extinguishers will be adequately marked for easy location. Supervisors will ensure workers under their direct supervision are aware of the site-specific evacuation routes in case of an emergency. Fire extinguishing equipment will be of a suitable type and size to permit the evacuation of workers during a fire. Every fire extinguisher will be selected to be appropriate for the workplace and type of fire that may occur. Fire extinguishers will be inspected for defects or deterioration at least monthly by a competent worker who will record the date of the inspection on the tag attached to it. If the fire extinguisher indicates it is NOT charged immediately remove it from service and replace with a fully functioning fire extinguisher. Monthly inspections will be recorded on the inspection tag provided with the fire extinguisher. A third-party technician will perform annual inspections. Records of the date of inspection and name of the inspector will be logged and kept within the first aid kit. After a fire extinguisher is used, it will be recharged or replaced immediately.

### **Fire Emergency**

If possible, use a fire extinguisher to extinguish the flames. The fire extinguisher may also be used to assist with evacuating to clear a path for exit. If the fire is too large, locate the nearest pull station and pull to set off the alarms. If the building or location is under construction and there are no fire alarms, use the horns or other communication system onsite to notify worker of a fire. Dial 911 to dispatch the fire department. Follow all onsite evacuation procedures and go to the muster location to await further instruction.

### **Emergency Procedures Involving Evacuations**

If the site or location must be evacuated, remain calm. If possible, shut down machines and equipment. Leave the area and warn others using the appropriate communication system. Fire wardens may be in place to check that all others in the area are leaving as instructed. Provide any assistance required or as requested by fire wardens, particularly for any workers that require assistance. As you exit, secure doors, if possible. Go to the muster location and await further instruction.

### **Emergency Procedures Involving Cave-Ins**

It is natural to try to rescue casualties caught or buried by a cave-in, but care must be taken to prevent injury and death to rescuers, whether from a further cave-in or other hazards. Scene was made safe to enter and isolated. Call for help, use bystanders, if any, and retrieve a first aid kit, AED and call 911. Notify the supervisor. If able to assist, use a

tarp/fencing/plywood, etc. to cover the ground, then excavate the area around the headfirst before excavating the area in front of the chest. Use rope and harness. Remove worker using backboard, tarp, etc. and provide first aid while awaiting emergency medical services.

### **Emergency Procedures Involving Lightning**

Monitor the weather reports and plan work accordingly to avoid working when lightning may occur. Be prepared: Identify safe and unsafe locations beforehand. Planning is the single most important means to achieve lightning safety. Supervisors will monitor weather conditions and report hazards to all outdoor workers. Outdoor workers should monitor weather conditions and report hazards to supervisors and work should be suspended if lightning poses a risk to workers.

If hopelessly isolated from shelter during close-in lightning, adopt a low crouching position with feet together and place hands on ears.

In the event a worker receives a lightning strike, seek medical attention immediately. People who have been struck by lightning do not carry an electrical charge and are safe to handle. Follow the first aid procedures for the site or location.

### **Emergency Procedures Involving Electrical Contact**

Ensure scene is safe to enter and isolate the electricity, if possible. Workers should stay on or in the equipment unless it unsafe to do so. Contact the local utility company to shut off power for high voltage. Aid and rescue only if trained to do so. Any worker who receives an electrical shock, even minor, must be monitored by a medical professional. Follow the first aid procedures.

### **Emergency Procedures Involving a Gas Line Break**

In the event of gas line contact, contact the gas utility and alert the supervisor/office immediately. The gas company will check the line and close the supply if necessary. Remove all sources of ignition and leave area immediately. If damage to the coating or pipe occurs and no gas is escaping, leave the pipe exposed and contact local gas company. No attempt should be made to control escaping gas.

### **Emergency Procedures Involving Chemical Spills**

In the event of a small or large spill refer to the safety data sheet (SDS) for detailed cleanup. If required, engage an environmental cleaning contractor to assist with the clean-up. Report the incident to supervisor. The incident may also need to be reported to government officials.

### **Emergency Procedures Involving Traffic Accidents**

If a worker is involved in a collision during work time in a personal or company vehicle, the worker must not leave the scene unless authorized by a police officer or other authority. The worker must immediately notify the supervisor and document events. If the worker requires medical attention, call 911 and request an ambulance for transport.

### **Rescue Procedures for Fall Arrest**

If a worker wearing a full body harness should fall to a suspended position, a rescue must be performed. A written rescue plan must be completed prior to the work being performed. Furthermore, a rescue requires someone to complete the rescue and it is for this reason that no person required to wear a full body harness is allowed to work alone. There are several options that can be used to perform a rescue. If a rescue cannot be performed safely then the rescuer will call the local fire department for assistance. If it is suspected that a rescue cannot be performed successfully within twenty minutes, call the local fire department immediately for help. If the worker has sustained medical injuries because of the fall, proceed with medical procedures.

### **Emergency Equipment**

Emergency response equipment will be regularly inspected and maintained according to the manufacturer's requirements. Records of inspections will be retained. Adequate emergency equipment will be available on-site and that it is well- marked and regularly inspected and maintained.



### **Emergency Plan Reviews**

Emergency prevention procedures and response plans will be reviewed periodically, but at least annually and will be revised as appropriate. Emergency prevention procedures and response plans will be reviewed at the site level, as part of the Site-Specific Orientation process.

### **Emergency Resources**

C&M Electric will identify the necessary resources to implement the prevention procedures and activate the response plans, including considering the needs of other interested parties, such as emergency services, authorities or the public. Resources will include but not limited to:

- Ensuring adequate training
- Ensuring the proper emergency equipment is provided in adequate numbers and in adequate locations to ensure that ERPs can be executed as required.
- Where necessary, enlisting the services of experts to contribute to the planning, communication, and training of specific ERPs.
- Providing effective means of communication when situations may place limitation on such communication.
- Ensuring that the identified Muster Station will protect evacuated personnel from the elements such as severe heat or cold.

### **Transport of Injured Worker**

Management is responsible for the transportation to medical facilities of any worker who is injured or made ill while working on a jobsite. It will be the responsibility of the supervisor or first aider to determine the proper means of transportation on a case-by-case basis. A medical facility may include the hospital or other facility where the injured worker will receive treatment from a health care provider. If the worker does not require transportation by ambulance, the injured worker will be transported to the nearest health care facility by taxi, supervisor, a co-worker or the first aider.

### **Emergency Drills**

When possible, training will include a practical component, such as a drill, to ensure workers are trained and familiar with their roles and responsibilities in the event of an emergency. Workers will receive emergency response training appropriate for their role. First aid training will be provided as necessary to ensure that one trained first aider is always available on site.

C&M Electric will ensure that emergency drills and/or testing of the ERPs identified emergency situations are conducted every quarter, and in a manner that does not introduce new hazards. The H&S Coordinator will send out an Action Item through eCompliance requesting the Supervisor to conduct an emergency response drill. Once completed, the Supervisor will provide feedback to determine if a corrective action is required. Records of drills and testing will be retained. Each year, as part of the annual all-company Health and Safety Meeting, there will be a mock fire/evacuation drill.

### **Review**

Emergency prevention procedures and response plans will be reviewed periodically, but at least annually, by the H&S Consultant who will visit each site to ensure the effectiveness of the procedures and will revise as appropriate. Revisions resulting in substantial change will trigger the implementation of our Change Management Policy and Procedures.

### **Training**

Workers will be trained such that they have a basic understanding of what is required to prepare for workplace emergencies, how they can be ready to respond as well as what they should know about their site ERP. Additional training will be given on the use of emergency equipment where applicable, and on the roles and responsibilities of workplace parties concerning emergency response procedures. Senior Management will ensure that affected employees receive adequate training to ensure



the effective implementation of this policy. Training will be delivered through the New Worker Orientation by the H&S Coordinator and during the Site Orientation delivered by the Supervisor. In addition, each year, as part of the annual all-company Health and Safety Meeting, there will be a review of our emergency procedures, CPR, fire extinguisher use and eye wash procedures.

### **Emergency Communication**

Emergency prevention procedures and ERPs will be communicated with all workplace parties and known external interested parties, including specific training for any person with defined duties or responsibilities in relation to the procedures or plans. If, due to extraordinary circumstances such as working in a remote location, performing work outside of the general scope of our company, C&M Electric deems it would be beneficial to seek advice from relevant interested parties, this action will be taken. Site-specific safety plans include an orientation checklist where workers will be required to sign off that they received the necessary information, that they have no outstanding concerns, and that they will work within the plan.

There will be an appropriate emergency communication on all work sites. The system may include a foghorn, a car horn, or other means with the greatest odds of being heard by the workers. All emergency situations must be reported to the supervisor immediately in person, by phone, by text or email or by any other effective method.

All emergency phone numbers are to be posted on the jobsite bulletin board or, on smaller projects, available in the jobsite health and safety binder. Supervisors will be equipped with a means of communication when on a project. Supervisors are required to check their method of communication to ensure it is maintained in good working order.

In the event that phones are not available or are not functioning, three long blasts of an emergency horn, car horn can be used to indicate an emergency. Pulling the fire alarm is also a means of communicating an emergency.

It will be the responsibility of the supervisor to ensure communication equipment is maintained in excellent operational condition to facilitate emergency communications. Records will be kept of all communication equipment maintenance.

### **Record Keeping**

All documents and records generated by the implementation of this policy, will be kept on file per the Document and Record Control Policy.

### **Communication**

This policy will be communicated to all employees by way of meetings, safety talks, or any other method deemed effective by management. Emergency prevention procedures and response plans will be communicated with all workplace parties and known external interested parties, to include specific training for any person with defined duties or responsibilities in relation to the procedures and/or plans. Communication will include training, worker orientation, emails, or by any other means deemed effective by management. Health and safety documents related to emergency procedures will be posted on the Project Health and Safety Bulletin Board or, on short term duration projects, will be located in the On-site Health and Safety Binder.

### **Evaluation**

This policy will be evaluated at least annually by management, the JHSC, workers and/or the Safety Team. Evaluations will ensure the policy is compliant with current legislation, industry standards and that the policy is being implemented as required and that it is effective. When corrections/revisions are deemed necessary, policies, programs, supporting forms etc. will be developed and recorded. Corrections/revisions will be communicated to workers in a timely manner through posted materials, meeting minutes, toolbox talks, safety meetings etc. Records will be retained as per our policy. ERPs will also be reviewed periodically but at least annually when applicable, to ensure effectiveness. If corrective action or revisions are required, they will be recorded and communicated to all relevant workers.

# Statistics

## Policy Statement

C&M Electric will establish, implement, monitor, and maintain a documented policy statement and procedure to organize, monitor, and regularly measure their OHS performance.

OHS performance will be measured at a specified frequency and will:

- Include qualitative and quantitative measurements appropriate to the organization.
- Include leading and lagging performance measures.
- Compare current health and safety performance with past performance.
- Include analysis of statistics and identification of trends.
- Include analysis of first aid treatment records.

Results from the annual statistics will be recorded and communicated to relevant workplace parties.

It is the policy of C&M Electric to use good record keeping to:

- Monitor and evaluate the health and safety performances of our organization, specific job site, supervisory personnel, and workers.
- Identify common factors and trends in accidents and incidents to assist in the development of policies and programs that will help in our goal of reducing the severity and frequency of accidents and illness.
- Monitor and evaluate the effectiveness of corrective actions.

All records and documents related to statistics will be retained and stored per our company policy.



**Ken Crawford**  
President, C&M Electric  
January 31, 2023

## Procedure

Annual statistics will be analyzed and needs, or trends will be identified. Analysis verification may include, but must not be limited to minutes, trend analysis, corrective action plans which identify areas such as:

- Where additional training is required.
- Where equipment should be repaired or replaced.
- Where a new safe work practice should be developed or an existing one should be improved.
- Where a specific job task analysis should be undertaken.

First aid treatment analysis verification may include first aid treatment records, minutes, trend analysis, corrective action plans.

## Definitions

Statistics – A form of mathematical analysis that uses quantified models, representations and synopses for a given set of experimental data or real-life studies.

Analysis - A systematic examination and evaluation of data or information, by breaking it into its component parts to uncover their interrelationships.

Trends – Once statistics and data have been collected, trends may appear within the data, such trends may be indicative of potential problems (hazards, risks, reoccurring incidents, etc.) that must be addressed.

Leading indicators - Measurable or observable variable of interest that predicts a change or movement in another data series, process, trend, or other phenomenon of interest before it occurs.

Lagging indicators - Measures performance outputs. Data is collected after the fact and provides information on the results of processes, policies, and procedures. Lagging indicators are a record of past performance and determine an organization's bottom line on safety and health.

## Forms

C&M Electric uses the following forms for Statistics:

Statistics Report	STA A SA11
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## Responsibilities

### Senior Management

- Ensure records are reviewed and that statistics are documented.
- Maintain records of orientation, project inspections, safety audits, MLTSD reports and follow up actions.
- Monitor injury frequency rates.
- Compile an annual report on all health and safety activities and occurrences.
- Ensure follow up performed for all action items.
- Ensure appropriate actions are taken.

### Supervisor

- Record all accidents, incidents, first aid occurrences, lost time injuries, equipment. damage, MLTSD reports and JHSC minutes and make available on the project.
- Send all relevant health and safety information to head office.
- Coordinate first aid response, accident investigation or other follow up procedures after an occurrence.

### Worker

- Report accidents, incidents, first aid occurrences, lost time injuries and equipment damage to project supervisor.

### H&S / Operations Coordinator

- Assist Senior Management with the implementation of this Policy and Procedure.

#### **H&S Representatives and/or JHSC**

- Be consulted on and make recommendations concerning this policy.

#### **Subcontractor**

- Report accidents, incidents, first aid occurrences, lost time injuries and equipment damage to project supervisor.

#### **Frequency**

Senior Management will ensure that, at least annually, and under the direction of the Health and Safety Coordinator, or delegate, data will be collected, analyzed, and compared to past performance indicators to predict future performance. The results of this process will be documented.

Yearly reports will be analyzed to identify gaps in the OHSMS, opportunities where we can improve such as the provision for additional training, equipment repair or replacement, the need for the development of safe work practices and/or safe job procedures or changes to company policies and procedures.

Statistical results will help C&M Electric to:

- 1) Monitor the effectiveness of control measures.
- 2) Ensure legal and other requirements are being fulfilled.
- 3) Determine conformance to our OHSMS objectives.

Records to be analyzed may include but will not be limited to:

- Accident and Incident Reports
- Inspection Records
- Disciplinary Action Records
- First Aid Treatment Records
- JHSC Meeting Minutes, if applicable
- Health and Safety Program Review
- WSIB Records
- Worker Orientation and Training Records
- Hazard Reports
- Worker Surveys or Interview Results

#### **Qualitative and Quantitative**

Quantitative data deals with numbers and statistics while qualitative data deals with words and meanings. C&M Electric will use methods of monitoring, measurement, analysis, and performance evaluation as applicable to ensure valid results. We will aim to collect both qualitative and quantitative measurements wherever possible.

- Qualitative analysis will be conducted through interviews, questionnaires, and survey.
- Quantitative results will be gathered through inspection scores and incident reports.

#### **Leading and Lagging Indicators**

When analyzing statistics, we will consider leading and lagging indicators. Leading indicators are considered to point toward future events and will help to predict future performance results such as providing additional training, increasing inspection frequency etc. Lagging indicators are seen as confirming a pattern that is in progress and provide an overview of health and

safety performance, such as the tracking of injury statistics, exposure incidents, etc.

### Tracking

C&M Electric will measure OHS performance against past performance to track the success and status of implemented strategies, processes, and activities to control risks to health and safety. To achieve this, specific questions will be asked, such as:

- Where are we now relative to our overall health and safety aims and objectives?
- Where are we now in controlling hazards and risks?
- How does our current performance compare to past performance?
- Are we improving?
- Is our management of health and safety reliable and consistent?
- Is our workplace culture supportive of health and safety?

### Trends

When analyzing data, it will be the intent of C&M Electric to identify trends either positive or negative. Positive trends, such as a reduction in accidents, would lead to further analysis as to what we are doing right and if we can build upon those strategies. Negative trends, such as an increase in disciplinary action taken would indicate something that we want to analyze as to why the increase and what we can do, moving forward, to reduce the trend.

### First Aid

As part of the statistic process, we will analyze first aid treatment records to identify reoccurring incidents and with the intent of developing controls to prevent reoccurrence.

### Performance Statistics

The following performance statistics shall be collected, where applicable, and evaluated:

#### 1. Quantitative Lagging Indicators

- a. Number of near misses
- b. Number of first aids
- c. Number of accidents
- d. Frequency and Severity of accidents

The following formulas will be used to calculate overall incident rate, frequency, and severity:

$\text{Injury Severity Rate} = (\text{Number of lost workdays}) \times 200\,000 / \text{total hours worked}$

$\text{Lost Time Frequency} = (\text{Number of lost time injuries} \times 200\,000 / \text{total hours worked})$

- e. Work refusals
- f. Health and Safety Representative / JHSC outstanding/unresolved concerns
- g. MLTSD OHSA citations (number of citations and type)
- h. WSIB Claims

#### 2. Quantitative Leading Indicators

- a. HSE Training
- b. HSE Inspections
- c. HSE Audits
- d. Safety Talks
- e. HSE Meetings
- f. Risk Assessment
- g. Hazards identified and corrected

#### 3. Qualitative Indicators

- a. All employees feel safe at work
- b. Employees satisfaction with management's commitment to health and safety

### **Procedure**

The supervisor will keep, maintain, and ensure accuracy for all records as required. All project safety data will be reviewed, organized and filed by management so that they are readily available. This may be done either with hard copies or electronic copies. Records submitted from a project will be compiled into reports/charts/graphs etc. at least annually. Statistics will be analyzed to identify trends, repeated contravention or repeated injuries or commonly identified hazards. Action required will be noted to ensure that appropriate action will be taken, to respond to trends, repeated contravention, repeated injuries, or commonly identified hazards.

### **Training**

Senior Management will ensure that effected employees receive adequate training to ensure the effective implementation of this policy.

### **Record Keeping**

Statistical analysis will be recorded using our Annual Statics Report form. All documents and records generated by the implementation of this policy, will be kept on file as per document retention policy, to show that the incident investigation and reporting procedure is being followed.

### **Communication**

A copy of the Annual Statistics Report will be made available to Senior Management for review and to relevant workplace parties upon request. General findings from the report will be communicated to all employees during the annual all-company health and safety meeting. Trends, both positive and negative, will be communicated.

### **Evaluation**

This policy will be evaluated at least annually by management, the JHSC, workers and H&S Representative. Evaluations will ensure the policy is compliant with current legislation, industry standards and that the policy is being implemented as required and that it is effective.

# Legislation

## Policy Statement

C&M Electric is committed to establishing, implementing, monitoring, and maintaining a documented policy statement and procedure for identifying and complying with all applicable legislation.

Ensuring compliance with relevant obligations is fundamental to the achievement of company objectives. The procedure includes:

- Identification of applicable legislation, regulations, standards, and any other requirements.
- Methods to ensure compliance with applicable legislation.
- Documentation related to legislation, regulations, standards, or other requirements be current.
- Visible posting or availability of relevant legislation at each workplace as required.
- The evaluation of compliance to legislation at regularly planned intervals and retention of records of evaluations.

C&M Electric strives to meet all compliance obligations and is committed to having in place appropriate and effective systems and tools to enable us to do so. C&M Electric is further committed to having a workplace culture of integrity and compliance in conducting its business activities lawfully in a manner that is consistent with its compliance obligations.



**Ken Crawford**

President, C&M Electric

January 31, 2023

C&M Electric is committed to regularly monitoring, measuring, and assessing the effectiveness of its OHSMS and compliance performance and to fostering a positive compliance culture and encouraging proactive, transparent, and accountable management of compliance.

## Definitions

Legal Compliance – The process by which a company adheres to the complex rules, policies and processes that regulate business practice in a particular jurisdiction.

Standard - Formal document that establishes uniform engineering or technical criteria, methods, processes, and practices.

Manufacturers' Specifications - Contains all the information pertaining to the use, maintenance, safety, etc. as written by the producer of a product, tool or equipment. It describes the stages of manufacture and the materials needed, using flowcharts, diagrams, notes, and samples. This means that if more than one product is made then each product should be the same.

Revision – Process of making changes to it to improve it, make it more modern, or make it more suitable for a particular purpose.

## Forms

C&M Electric uses the following forms for Legislation:

Company Health and Safety Assessment	HA2 A SA2
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## Responsibilities

### Senior Management

- Know and ensure understanding of legislation that applies to the business and the work it performs.
- Ensure applicable legislation, regulations, standards, and any other requirements are identified.
- Ensure compliance with all legal requirements at all times.
- Develop and maintain procedures that facilitate and monitor compliance.
- Develop procedures to ensure adequate documentation related to legislation, regulations, standards, and any other requirements are up to date.
- Ensure all record keeping within the company is strong, that employees know what to keep a record of, and that records are readily available and stored safely.
- Ensure current copies of applicable legislation are visibly posted or available at each workplace.
- Know and meet C&M Electric's reporting obligation to authorities governing applicable legislation.
- Ensure employees know and understand their responsibilities when it comes to compliance.
- Evaluate compliance to current applicable legislation at least annually.
- Ensure legislated posting requirements are being met.
- Implement and track approved changes to policies and procedures.
- Ensure appropriate workplace parties are made aware of the changes.
- Appoint competent supervisors who are knowledgeable about the work, the actual and potential hazards and the applicable laws and regulations.

### Supervisor

- Be fully knowledgeable about the work, the actual and potential hazards and the applicable laws and regulations.
- Know and ensure understanding of legislation that applies the work being performed.
- Ensure workers know and understand their responsibilities when it comes to compliance.
- Monitor and ensure compliance at all times.



- Meet all documentation requirements of this policy and its procedures.
- Ensure current copies of applicable legislation are visibly posted or available at your worksite.
- Ensure legislated posting requirements are being met.
- Require employees take personal responsibility and accountability for satisfying compliance obligations.

#### **Worker**

- Know and understand legislation that applies the work you performed.
- Know and understand rights and responsibilities when it comes to compliance.
- Work in compliance with company policies and procedures.
- Perform your duties in an ethical, lawful, and safe manner.
- Report any unsafe act or any observed violations of legislation.

#### **H&S / Operations Coordinator**

- Monitor legislation by visiting relevant websites (MLTSD, WSIB, IHSA, ESA, etc.) at least annual.
- Assist management in the implementation of this Policy and Procedure.

#### **H&S Representatives and/or JHSC**

- Be consulted on and make recommendations concerning this policy.

#### **Subcontractor**

- Ensure their policies and procedures are current with legislated requirements and ensure workers work in compliance with all company policies, program, legislation, standards, regulations, etc.

#### **Applicable Legislation**

Senior Management ensure the identification all applicable H&S legislation, standards, codes, guidelines, and manufacturer's specifications that must be considered when developing procedures that are compliant with requirements. This will be achieved through our Assessment process. C&M Electric will ensure that the documentation of legal and other requirements is kept current, and that relevant information related to the legal and/or other requirements are communicated to workplace parties as appropriate.

#### **Procedure**

1. Identification of all new applicable legal and other requirements.
2. Management will evaluate all new applicable legal and other requirements with the participation of the JHSC and set an action plan to meet these requirements.
3. Management will incorporate legal and other requirements into the OHSMS.
4. Management will communicate the new legal or other requirements to the appropriate work parties and posted at each workplace.
5. Management will record all current legal and other requirements in the OHSMS Legislation Register and keep them up to date.
6. Employees will be educated in their roles and responsibilities and the rights of the employees.
7. Management will evaluate at least annually compliance to legal or other requirements and will record the evaluation in OHSMS Legislation Register. If a noncompliance is found, management will take corrective actions immediately.

#### **Currency**

All documentation related to legislation, regulations, standards, and any other requirements will be reviewed at least annually to ensure they are up to date. Other codes, standards, guidelines, and manufacturer's specifications that must be considered include but are not limited to building code, CSA standards, fire code, electrical code, etc.

### **Posting**

Relevant legislation will be posted/available at each workplace as required. A list of legally required documents to be posted in the workplace or on site includes but is not limited to:

- Copy of the Occupational Health and Safety Act and Construction Regulations
- Notice of Project and Form 1000, where required
- MLTSD Field Visits and Reports
- Emergency Procedures and Contact List
- First Aid Certificates
- In Case of Injury Poster
- Danger Signs, where required
- Form 82
- Name of H&S Rep or JHSC members
- MLTSD Address and Phone Number

### **Health and Safety Binders**

Where having a health and safety board onsite is not practical i.e., service vehicles and short-term work, a health and safety binder will be onsite which meets most posting requirements. Workers will be familiarized with the on-site safety binder.

### **Evaluation**

C&M Electric will establish, implement, and maintain a procedure to evaluate, at least annually, compliance with all legal requirements, as well as other requirements for which our organization subscribes. This policy will be reviewed annually, by upper management, for completion, currency, and effectiveness and to ensure it complies with current legislated requirements. Procedures will be evaluated at least annually to ensure they also follow legislated requirements and other requirements such as standards, codes, guidelines, and manufacturer's specifications. When corrections/revisions are deemed necessary, policies, programs, supporting forms etc. will be developed. corrections/revisions will be communicated to workers in a timely manner through posted materials, meeting minutes, toolbox talks, safety meetings etc. Documentation will be kept. We will ensure records of evaluations are documented and records are retained.

### **Training**

Senior Management will ensure that effected employees receive adequate training to ensure the effective implementation of this policy.

### **Record Keeping**

C&M Electric will ensure records of evaluations are documented and records are retained. All documents and records generated by the implementation of this policy, will be kept on file as per document retention policy to show that the incident investigation and reporting procedure is being followed.

### **Communication**

This policy will be communicated to all C&M Electric employees by way of meetings, safety talks, or any other method deemed effective by management.

### **Evaluation**

This policy will be evaluated at least annually by management, the JHSC, workers and the H&S Coordinator. Evaluations will ensure the policy is compliance with current legislation, industry standards and that the policy is being implemented as required and that it is effective.

# Management Review

## Policy Statement

C&M Electric is committed to establishing, implementing, monitoring, and maintaining a documented policy statement and procedure for senior management to review the effectiveness of the OHSMS at regularly planned intervals, and at least annually.

The input to the management review will include:

- Evaluation of the effectiveness of all elements of the OHSMS.
- Status of actions from previous management reviews.
- Results of internal audits, including COR audits.
- Results of participation and consultation with employees/ H&S Representative / JHSC.
- Communication from external parties.
- OHS performance of the organization.
- Evaluation of the extent to which OHS objectives have been met.
- Status of incident investigations, trends identified, implementation of corrective actions, implementation of preventive actions and status of action taken.
- Changing circumstances related to the OHS such as developments in legal requirements or technology.
- Recommendations for improvement.

The output to the management review will include:

- OHS policy updates.
- Measurable OHS objectives.
- Action plan to achieve objectives.
- Required resources.
- Any other elements of the OHSMS as appropriate.
- Communication of the objectives and action plan(s) to all personnel.



**Ken Crawford**

President, C&M Electric

January 31, 2023

Senior Management will periodically review the OHSMS to ensure its continuing suitability, adequacy, and effectiveness while addressing the possible need for changes to quality policy, objectives, targets, and other elements of the OHSMS.

## Definitions

Health and Safety Management System - Organized efforts and procedures for identifying workplace hazards and reducing accidents and exposure to harmful situations and substances.

Goals - The long-term outcomes the company wants to achieve.

Objectives - Measurable step the company will take to achieve its goals.

Action Plan – A detailed set of instructions to be followed to achieve an objective or goal.

Qualitative Research - A research method of collecting descriptive (non- numerical) data i.e., interview and observation.

Quantitative Research - Refers to research method of collecting numerical data i.e., charts and graphs

Corrective Action - Action taken to eliminate the cause of a non-conformity and to prevent recurrence.

Preventative Action - Action taken to eliminate the cause of potential non-conformity or another potential undesirable potential situation.

Inputs - Resources that are needed or used in the execution of a process - what makes a process work.

Outputs - Results or outcomes that are created through the execution of a process or process step.

## Forms

C&M Electric uses the following forms for Management Review:

Management Review Minutes	MR2 A SA15
Master Action Plan (MAP)	MR2 A SA13
Accident Investigation Package	INV2 A F1
First Aid Treatment Logs	EP2 A F2
Incident Report	WI3 A F3
Medical Treatment Package	EP2 A F4
Recommendation Report	SC2 A F4
Revisions Report	DOC2 A F2
Risk Management Report	HA2 A SA4
Statistics Report	STA A SA11
Change Management Plan	CM2 A SA16

## Responsibilities

### Senior Management

- At least annually, ensure an evaluation of the effectiveness of all elements of the OHSMS.
- As a result of the annual management review management will ensure adequate outputs are generated.
- Ensure forms are available for the recording of the management review and all input and output functions.
- Ensure all those required in the management review process have the time, resources, and competency to implement our health and safety program and to achieve its policy, objectives, and targets.
- Make health and safety an organizational priority like other priorities and integrates the management system into all aspects of the organization.
- Promote participation of, and seeks feedback from, all workplace parties in developing, implementing, and maintaining the HSMS and recognizes the value of these contributions.
- Appoint a competent person responsible for the coordination of our health and safety program.
- Provide support and leadership to all parties.
- Include responsibility and target dates for attaining goals.

### **Supervisor**

- Assist Senior Management with this Policy and Procedure.

### **Workers**

- Assist Senior Management with this Policy and Procedure.

### **H&S / Operations Coordinator**

- Assist Senior Management with this Policy and Procedure.
- Gather required documents to be reviewed and make available at the Management Review meeting
- Ensure changes resulting from the management review process are handled in accordance with our Change Management Policy and Procedure.

### **H&S Representative or JHSC Members**

- Be consulted on and make recommendations for improvement of any and all elements of our H&S Program.

### **Inputs**

As a part of our management review process, management will review of the following inputs.

- Monitor the status of action items from previous management reviews.
- Review the results of internal audits, including COR audit.
- Review evaluations of legislation, standards, etc. and compliance with these requirements.
- Review worker opinions about program effectiveness as a documented in safety talks, inspections, surveys, Q&A session, H&S Representative reports, JHSC recommendations or any other effective means.
- Identify barriers to worker participation in the OHS program.
- Review communication with external parties which may include reports, emails, etc.
- Review the annual Statistics Report to evaluate the overall H&S performance of the team
- Review the annual Action Plan from the current year and the past year to evaluate the status of actionable items and how they indicate the degree of success towards meeting our H&S objectives.
- Review Accident Investigation Reports to determine their status, trends identified, implementation of corrective actions, implementation of preventative actions and status of actions taken.
- Review Revision Reports to ensure the changes such as legislation or best practices, have been reflected in current policies, procedures, forms, and documents.
- Evaluate recommendations for improvement made to us from any source.

### **Outputs**

As a result of our management review process, we will ensure adequate outputs are generated.

- H&S policy, program, forms etc. updates as required due to changes such as legislation.
- C&M Electric will generate measurable H&S objectives for the upcoming year.
- An Action Plan will be generated to include a detailed set of instructions to be followed to achieve an objective or goal.
- Resources required will be determined to include people, equipment, facilities, funding, or anything else required for the completion of an action item.
- Revisions will be made to any other elements of our H&S policies and programs as appropriate.
- Steps will be identified, and action items determined to remove barriers to worker participation in our H&S program.

Yearly objectives and action items will be communicated to workers at the annual all-company H&S meeting.

### **Program Evaluation and Improvement**

At least annually, management will step back and evaluate our OHSMS and OHS program to see what is working and what is not, and whether the program is on track to achieve its goals. C&M Electric will share the results of monitoring and evaluation within the workplace, and celebrating successes, will help drive further improvement. Program evaluation and improvement will include:

- Establishing, reporting, and tracking goals and targets that indicate whether the program is making progress.
- Evaluating the program initially and periodically thereafter to identify shortcomings and opportunities for improvement
- Providing ways for workers to participate in program evaluation and improvement.

### **Monitor Performance and Progress**

C&M Electric will define indicators that will help track performance and progress. We will establish procedures for the collection, analyzing, and review of performance data. We will hold workplace parties accountable to ensure they are following established procedures.

### **Leading and Lagging Indicators**

Both lagging and leading indicators will be used. Lagging indicators track worker exposures and injuries that have already occurred. Leading indicators track how well various aspects of the program have been implemented and reflect steps taken to prevent injuries or illnesses before they occur. Indicators can be either quantitative or qualitative. Whenever possible, we will select indicators that are measurable (quantitative) to help us determine whether we have achieved our program goals. The number of reported hazards and near misses would be a quantitative indicator.

### **Evaluating Performance and Progress**

At least annually, C&M Electric will evaluate our OHS policies and programs to ensure that they are operating as intended, are effective in controlling identified hazards, and are making progress toward established company H&S goals and objectives. When evaluating our OHSMS we will:

- Verify that the core elements of our program have been fully implemented.
- Verify that workers are involved in all aspects of program evaluation, including reviewing information and identifying opportunities to improve the program.
- Verify that the following key processes are in place and operating as intended:
  - Reporting injuries, illnesses, incidents, hazards, and concerns.
  - Conducting workplace inspections and incident investigations.
  - Identifying hazards, analyzing, and developing controls for routine and non-routine work.
  - Collecting and reporting any data needed to monitor progress and performance.
- Review the results of any compliance audits to confirm that any program shortcomings are being identified. Verify that actions are being taken that will prevent recurrence.
- Continuous nonconformity items will be analyzed and assessed for reasons and presented to management for review.

### **Corrective and Preventative Action**

When shortcomings or gaps are identified through the management system, management will ensure that actions are taken to correct them. This will be accomplished by:

- Proactively seeking input from workers, supervisors, and other relevant people on how we can improve our program.
- Determining whether changes in equipment, facilities, materials, key personnel, or work practices trigger any need for changes in the program.
- Determining whether our performance indicators and goals are still relevant and, if not, how we could change them to drive improvements more effectively in workplace health and safety.

### **Training**

Senior Management will ensure that affected employees receive adequate training to ensure the effective implementation of this policy.

### **Record Keeping**

All management review records including the agenda, meetings notes, and report will be filed on eCompliance by the H&S Coordinator and in accordance with the procedures outlined in Document and Record Control. Observations, conclusions, and recommendations for further necessary action from the review must be recorded. If any corrective action or preventive actions must be taken, the H&S Coordinator will be responsible to ensure that the action was effectively implemented.

### **Communication**

C&M Electric will communicate OHS objectives and action plans to all employees at least annually at the Annual Health & Safety meeting. Following the meeting, all employees will receive an email re-iterating the objectives for their own records. This policy will further be communicated to all employees by way of safety talks, or any other method deemed effective by management.

### **Evaluation**

This policy will be evaluated at least annually by management, the JHSC, workers and H&S Coordinator, or their delegate. Evaluations will ensure the policy is compliance with current legislation, industry standards and that the policy is being implemented as required and that it is effective.

# Change Management

## Policy Statement

C&M Electric is committed to establishing, implementing, monitoring, and maintaining a documented policy statement and procedure for managing occupational health and safety change.

Ensuring effective change management within our organization is extremely important. The intent of this Policy and its procedures is to ensure the effective management of change while reducing risk. Key components to C&M Electric's Change Management policy and program include:

- Accurate Documentation
  - Identify the information relevant to a specific change that needs to be collected throughout the change management process.
- Continuous Oversight
  - C&M Electric will monitor and evaluate change to minimize risks.
- Formal, Defined Approval Process
  - All changes will follow the established management approval process to ensure routine changes are completed.
- Effective communication
  - C&M Electric will take adequate steps to ensure all affected workplace parties understand all aspects of change plans. Employee input will be encouraged and welcomed.
- Training
  - Adequate training will be provided to all workplace parties, specific to their roles and responsibilities regarding the change process and procedures.



**Ken Crawford**

President, C&M Electric

January 31, 2023



The Change Management procedure will be initiated by changes in legal requirements, significant changes in work processes, control measures, equipment, organization, industry best practices or work location, introduction of new products, processes, or services and/or introduction of new developments in OHS knowledge or technology.

### Definitions

Change Management - The process of guiding and supporting employees to successfully adopt a new way of working.

### Roles and Responsibilities

#### Senior Management

- Ensure adequate resources to support change procedures.
- Appoint a competent person to coordinate change management plans.
- Ensure a team approach to evaluation of the actual impact of changes.
- Cooperation with respective employees and other affected personnel involved in the change.

#### H&S / Operations Coordinator

- Lead the of processes connected to change management.
- Evaluation of the actual impact of changes.
- Cooperation with respective project teams and further managers involved in the organizational change.
- Identification of potential risks for resistance as well as development of plans to intervene.
- Support and management of the necessary communication activities related to the changes.
- Provide status updates when requested.
- Review change plans and schedules.
- Plan activities include scheduling the change request, assessing risk and impact, creating plans, defining, and sequencing the tasks needed to accomplish the change request, and scheduling people and resources for each task.
- Be involved in the planning, implementation, and post-implementation stages.
- Conduct post-implementation reviews to validate the results of the change request.

#### Workers

- Work cooperatively with workplace parties to accommodate changes and offer input into the change process for the betterment of the change.
- Report and hazards to the supervisor immediately.

#### H&S Representatives and/or JHSC

- Be consulted on and make recommendations concerning this policy.

#### Subcontractors

- Ensure workers work in compliance with this policy at all times.

### Forms

C&M Electric uses the following forms for Change Management:

Change Management Plan	CM2 A SA16
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### Significant change

When a significant change is required, management will assume control over all aspects of change to include budgeting,

scheduling, determining scope, communication, and other resources. The change management plan will minimize the impact a change can have on the business, our employees, and customers.

This policy and procedure will be implemented when a significant change is identified, to include, but not be limited to:

- Changes in legal requirements
- Significant changes in work processes, control measures, equipment, organization, industry best practices and/or work location.
- Introduction of new products, processes, or services.
- Introduction of new developments in OHS knowledge or technology.

### **Change Management Plan**

When a significant change is required, management will follow these steps to ensure a smooth transition. Determining the reasons for the change, which will include at a minimum: changes in legal requirements or significant changes in work processes, control measures, equipment, organization, industry best practices and/or work location.

#### **Process for Changes in Legal Requirements**

1. When the H&S Coordinator receives a change in legal requirements from MOL or IHSA, applicable sections of the program will be reviewed by senior management and updated accordingly by executing the Change Management Review Process.
2. The change will be communicated to workers through a Toolbox Talk the week following the change.
3. An audit will be conducted to ensure successful implementation one month following the change.

#### **Process for Changes in Work Processes, Control Measures, Equipment, Organization, Work Location**

1. When a notice of change is received from OCA, ECAO, IBEW or ESA, applicable sections of the program will be reviewed by senior management and updated accordingly by executing the Change Management Review Process.
2. The change will be communicated to workers through a Toolbox Talk the week following the change.
3. An audit will be conducted to ensure successful implementation one month following the change.

#### **Process for Introduction of New Products, Processes or Services**

1. When a new product, process or service is introduced at C&M Electric, senior management will review the WTM and the applicable sections of the program and update accordingly by executing the Change Management Review Process.
2. The change will be communicated to workers through a Toolbox Talk the week following the change.
3. An audit will be conducted to ensure successful implementation one month following the change.

#### **Process for Introduction of New Developments in OHS Knowledge or Technology**

1. When new developments in OHS knowledge or technology is received from the MOL, IHSA or H&S Consultant, applicable sections of the program will be reviewed by senior management and updated accordingly by executing the Change Management Review Process.
2. The change will be communicated to workers through a Toolbox Talk the week following the change.
3. An audit will be conducted to ensure successful implementation one month following the change.

### **Change Management Review Process**

- Senior management will perform a review of the program by executing the following: Perform a hazard assessment if the changes proposed may present a hazard to those affected i.e., the introduction of a high-risk tool, equipment, machinery and/or work task. The hazard assessment will be completed using the processes and procedures outlined in our Hazard assessment, Analysis and Control and Control policies and

procedures.

- Relevant controls will be developed in compliance with our Controls policy and program.
- Relevant controls will be communicated to all affected employees.
- When necessary, adequate training will be developed and delivered to relevant workplace parties
- Determining change impact, including policies, processes, job roles, and organizational structure
- Identify who will be responsible for overseeing smooth change transition from the planning stage through to the final evaluation process. This person will be known as the change manager for the project
- Assign who will be involved in the change process and determine their roles and responsibilities
- Clarify the expected benefits so that everyone involved understands the advantages of proceeding with the change.
- Establish systems for ensuring that all aspects of the change process will be allow for clear communication and that allows for feedback from affected parties.
- Establish processes and systems to monitor success, troubleshooting, milestones, and resistance to the plan. Allow for the need to update or to revise processes and systems.
- Document the plan and keep accurate records from the planning stages through completion of the change process.
- Conduct a gap analysis to determine if workplace parties have adequate training to address the change.

### **Training**

Senior Management will ensure that affected employees receive adequate training to ensure the effective implementation of this policy. When a significant change occurs, relevant training will be communicated to all workplace parties via Toolbox Talks. If the Supervisor lacks the expertise to deliver the training, the H&S Consultant or H&S professional will deliver the training.

### **Record Keeping**

All documents and records generated by the implementation of this policy, will be kept on file. Documents and records will be maintained as per the procedure outlined in the Document and Record Control.

### **Communication**

Changes resulting from the implementing of this policy, will be communicated to all employees by way of meetings, safety talks, or any other method deemed effective by management.

### **Evaluation**

This policy will be evaluated at least annually by management, the JHSC, workers and H&S Coordinator, or their delegate. Evaluations will ensure the policy is compliance with current legislation, industry standards and that the policy is being implemented as required and that it is effective.

# Health and Safety Audits

## Policy Statement

Safety audits are essential because they review existing policies and procedures designed to keep people safe, improve operational efficiency and reduce maintenance costs and the findings are used to improve safety, help with equipment scheduling, set budgets, among other things.

C&M Electric is committed to revealing the need for major corrective actions and minor actions that we need to consider when implementing in the short or long term. The audit team will work cooperatively with management, supervisors, and workers to set priorities based on audit finding. Issues that possess biggest risks will receive priority over items with lower risks.

Workplace safety audits help to identify whether safety management systems are operating effectively and efficiently. In general, workplace injuries and accidents are the result of minor issues that could have been identified by conducting workplace safety audits earlier. Therefore, these assessments protect both employees and the organizations by reducing injuries and operating costs and, because of this, increasing productivity.



**Ken Crawford**

President, C&M Electric

January 31, 2023

C&M Electric will ensure the internal auditors are trained, authorized, and provided with adequate resources to direct, comprehensive program of internal auditing in compliance with COR standards.

To facilitate the audit process, C&M Electric will establish, implement, monitor, and maintain a documented policy statement and procedure.

Management will demonstrate our commitment, leadership, and effective participation by taking ultimate responsibility for C&M Electric's occupational health and safety performance and the OHSMS.

### Definitions

Audit: A systematic, independent, and documented process for obtaining evidence and evaluating it objectively to determine the extent to which pre-determined criteria is fulfilled.

Compliance: Meeting all requirements outlined within applicable legislation and regulations. Conformity: Fulfillment of a requirement.

Nonconformity: Non-fulfillment of a requirement.

### Forms

C&M Electric uses the following forms for Audits:

Audit Summary Report	MR2 A SA12
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### Roles and Responsibilities

#### Senior Management

- Designate one or more employee(s) and a member(s) of senior management with responsibility and accountability for ensuring that an OHSMS is established, implemented, monitored, and maintained in accordance with the requirements of COR 2020. The identity of this person(s) shall be made available to all workplace parties in the workplace.
- Ensure planning and promotion of the effective implementation and continual improvement of the OHSMS.
- Ensure that the resources needed for the OHSMS are available.
- Ensure that all appropriate workplace parties (e.g., Joint Health and Safety Committee (JHSC), Health and Safety Representative (H&S Representative)) are consulted and have the information, mechanisms, time, and resources to participate in the OHSMS.
- Management will facilitate the audit process and approve the internal audit prior to submission to IHSA.
- Provide auditors with documentation necessary for the completion of the audit.
- Appoint a qualified, permanent full-time employee of the company and ensure they have completed IHSA training as outlined in this policy.
- Ensure a team approach to the audit process.
- Define roles, assign responsibilities, and establish accountabilities for relevant workplace parties to contribute to the OHSMS and identify and ensure competencies.

#### Auditor

- Complete and submit the Employer's COR Internal Audit and the supporting documentation.
- Comply with COR program guidelines and COR Audit Instructions.
- Cooperation with respective project teams and further managers involved in the organizational change.
- Provide direction and leadership to the audit team members.
- Work co-operatively with all employees.

### **Workers**

- Work cooperatively with all audit team members and provide truthful information when requested.
- Report and hazards to the supervisor immediately.

### **H&S / Operations Coordinator**

- Assist management with the implementation of this policy.

### **H&S Representatives and/or JHSC**

- Be consulted on and make recommendations concerning this policy.

### **Documentation**

The procedure for documentation will include, as a minimum:

- Documents and records required by this Standard.
- Documents and records determined by us to be necessary for the effectiveness of the OHSMS.
- A description of the main elements to include their interaction with and/or reference to related documents.
- The creation, collection, retention and distribution of documents and records will comply with all applicable legal requirements, collective agreements, and company policies, as appropriate.

Documents and records will be maintained as per the procedure in our Document and Record policy and procedures.

In keeping with our Document and Records policy and procedures, documents will:

- Be approved prior to issue.
- Be review, update, re-approve or withdraw documents, as necessary.
- Be assigned an identifier, include their current revision status, and will be tracked if changes are made.
- Readily available at the point of use and will be the relevant version.
- Be legible and will remain legible, and readily identifiable.
- Be controlled to prevent the unintended use of obsolete documents.
- Be clearly marked as "Obsolete" to prevent the unintended use of obsolete documents if the document must be retained for any purpose.

Documents of external origin, which may be necessary for the planning and operation of the OHSMS, will be identified.

### **Elements**

C&M Electric will establish, implement, monitor, and maintain an occupational health and safety management system (OHSMS) in accordance with the requirements of this COR 2020 Standard. The OHSMS will:

- Have a written policy statement and procedure(s) for each element. This will include roles and responsibilities for relevant workplace parties.
- Support worker participation by identifying and removing barriers to participating in the Occupational Health and Safety Management System.
- Have a mechanism for communication to and from all appropriate workplace and external parties. Communication must be in a way that the receiver understands the message.
- Ensure workplace parties are trained and competent for the implementation of the element.
- Be evaluated to ensure effectiveness and continual improvement.
- Be revised and updated as needed.

### **Health and Safety Policy Statement**

Management will establish, implement, monitor, and maintain a documented occupational health and safety policy appropriate to the scale and nature of the organization's operations and activities, and associated risks. The policy will:

- Provide a framework for setting and reviewing OHS objectives and continual improvement of the OHSMS and OHS performance.
- Confirm senior management and management's commitment to provide a safe and healthy work environment for the prevention of injuries and illnesses.
- Express a commitment to follow applicable OHS legal and other requirements.
- Express a commitment to work in a spirit of consultation and co-operation with workers.
- Address health and safety responsibilities for workplace parties.
- Be signed by senior management and dated.
- Be current.
- Be visibly posted in the workplace.
- Be reviewed at least annually.
- Be communicated to workplace parties.

### **Hazard Assessment and Analysis**

Management will establish, implement, monitor, and maintain a documented policy and procedure for assessing, analyzing, and controlling hazards that is appropriate to the nature of the hazards and level of risk. The procedure will include:

- Requirement to conduct hazard assessments for all operations, including routine and non-routine and human factors, where work is performed.
- Requirements for reporting actual and potential hazards.
- Requirement to conduct risk assessment for identified hazards:
  - Proactively prior to commencement of tasks.
  - When equipment, material, substance, or process is introduced or changed.
  - When a change to the OHSMS may impact workplace operations or activities (Refer to element Management of Change).
- Requirement to Identify hazards originating outside of the workplace that may impact OHS within the workplace for which the organization has control.
- Consideration of legal requirements and associated standards and guidelines.
- Consideration of design and layout of the work area, ergonomics, machinery, and processes.
- Requirement for involvement of appropriate competent personnel such as workers, supervisors, maintenance, engineering, and suppliers in the hazard assessment process.
- Requirement to prioritize risks before and after identifying controls.
- Development of a list of identified critical tasks and/or activities.
- Determination of control measures using the hierarchy of controls:
  - o Elimination
  - o Substitution
  - o Engineering controls
  - o Administrative controls
  - o Personal protective equipment
- The hazard assessment, analysis and control measures will be documented, current, reflect actual practice and made available to affected workplace parties.

## **Controls**

- We will establish, implement, monitor, and maintain a documented policy statement and procedure for controlling hazards identified in Element 2 - Hazard Assessment, Analysis and Control.
- The controls will be developed following the hierarchy of controls, accurately reflect the organization's activities, consider applicable legal and other requirements such as standards, guidelines, or manufacturer instructions.
- Control measures will be documented, communicated, and made readily available to the affected workplace parties at the point of use as required.

## **Procurement and Contractor Management**

C&M Electric will establish, implement, monitor, and maintain a documented policy statement and procedure for procurement and contractor management/outsourcing. The procedure will include:

- Hazard assessment, analysis, and control for procured goods and services following the methodology required in Element 2 Hazard Assessment, Analysis and Control and element 3 Controls of the COR 2020 Standard.
- Occupational health and safety criteria for selecting, monitoring, and evaluating contractor/service providers.
- The criteria will include:
  - o The ability and competency of the contractor to be able to assess, analyze and control hazards arising from their own work that may impact the organization's workers.
  - o The ability and competency of the contractor to be able to assess, analyze and control hazards arising from our work that may impact the contractor's workers.
  - o Communication with workplace parties when there are changes affecting the health and safety of the work.
  - o Requirement for C&M Electric to lead the coordination and integration of relevant portions of our OHSMS on multi-employer or multi-contractor worksites.

## **Company Rules**

C&M Electric will establish, implement, monitor, and maintain a documented policy statement and procedure for company rules. The procedure will:

- Include responsibilities for setting, implementing, and complying with company rules.
- Ensure both standard and work location specific rules are available.
- Require company rules to be written and either visibly posted or provided to each employee.
- Ensure company and workplace specific rules are clearly explained to workers in a way that they understand them.
- Include a progressive disciplinary policy.
- Ensure company rules are applied and consistently enforced throughout the organization.

## **Personal Protective Equipment**

C&M Electric will establish, implement, monitor, and maintain a documented policy statement and procedure for Personal Protective Equipment (PPE). The procedure will:

- Ensure activities requiring PPE are documented and specific criteria is used to select appropriate PPE for all activities.
- Include written rules and/or guidelines for the proper fitting, care and use of PPE and ensure workers are made aware of them.
- Ensure that appropriate PPE is provided and/or made available to workers for specific activities.
- Include requirement for inspection and maintenance of PPE as per manufacturers and legislative requirements.
- Ensure management, supervisors, workers, sub-contractors, and suppliers of service use required PPE.

## **Preventative Maintenance**

C&M Electric will establish, implement, monitor, and maintain a documented policy statement and procedure for preventative maintenance. The procedure will include:

- An inventory of items to be maintained.



- Requirement for use of preventative maintenance schedules.
- Requirement to meet manufacturers' preventative maintenance guidelines and legislated requirements.
- Requirement to keep records including corrective actions taken.
- Qualifications for worker(s) performing the inspection and maintenance.
- Requirement to remove overdue and/or defective tools, equipment, facilities, and vehicles from service.

### **Training**

C&M Electric will establish, implement, monitor, and maintain a documented policy statement and procedure for training. The procedure will include:

- Setting roles and responsibilities for those administering and managing the training procedure.
- Identifying competencies for each task.
- Determining OHS training needs by:
- Reviewing legislated training requirements.
- How the training will be administered and managed.
- Evaluation of learning.
- Method for maintaining training records.

Training will:

- Take into consideration differing levels of responsibilities, ability, language skills and literacy.
- Include training as prescribed by relevant legislation and other requirements.
- Include information on the organization's OHSMS including purpose, roles, responsibilities and rights, importance of conformity, potential consequences for deviations or noncompliance and importance of workers' participation within the OHSMS.
- Be provided prior to the individual performing the relevant task.
- Include a relevant orientation program that:
- Is completed prior to starting work.
- Is provided for new and young workers, returning workers, change of position.
- Is mandatory for all workers.

### **Communication**

C&M Electric will establish, implement, monitor, and maintain a documented policy statement and procedure for OHS communication. The procedure will include:

- Senior management holding regularly scheduled company wide OHS meetings with all employees that includes the OHSMS and its implementation.
- Communication delivered in a manner that is understood by the receiver of the message and considers ability, language skills and literacy.
- Communication that provides opportunity for input from workers.
- Receiving, documenting, and responding to internal and external OHS communications.
- Tailgate or toolbox talks or their equivalent.

### **Workplace Inspections**

C&M Electric will establish, implement, monitor, and maintain a documented policy statement and procedure(s) for workplace and pre-use inspections. The procedure will include:

- Requirement to conduct and keep records for workplace inspections including identifying and preventing potential nonconformities and corrective actions.
- Requirement to conduct and keep records for pre-use inspections of vehicles, machines, tools, and equipment including corrective actions.

- Inspection frequencies and who must complete them.
- Appropriate worker participation in the inspection process.
- Requirement to meet all legislation and manufacturers' requirements.

### **Investigating and Reporting**

C&M Electric will establish, implement, monitor, and maintain a documented policy statement and procedure for reporting and investigating incidents. The procedure will include:

- Roles and responsibilities of workplace parties for reporting incidents and for conducting investigations in a timely manner.
- Requirement that personnel have been trained in legislative and company specific reporting requirements and investigation procedures.
- Actions to mitigate any additional consequences of the incident.
- Determination of OHS deficiencies including root causes of the incident.
- Determination of corrective and preventative actions.
- Communication of investigation results and corrective and preventative actions to interested parties.
- A process measuring the effectiveness of the corrective and preventative actions.
- Records of incidents and investigation reports.

### **Emergency Preparedness**

C&M Electric will establish, implement, monitor, and maintain a documented policy statement and procedure for emergency prevention, preparedness, and response. The procedure will include:

Identification of potential emergency situations.

- Documented response plans including roles and responsibilities of relevant personnel.
- Input of relevant interested parties.
- Identification of resources needed to implement the emergency response plans taking into consideration the needs of other interested parties.
- Requirement for emergency equipment to be in place, well-marked and regularly inspected and maintained.
- Prevention or minimization of injury or occupational illness for the identified emergency situations.
- Provision to transport injured workers to medical facility.
- An appropriate emergency communication system.
- Requirement for training for emergency response appropriate for roles and responsibilities.
- Periodic testing of the emergency response (e.g., drills) in a way that does not introduce new hazards and the maintenance of records of testing and corrective actions.
- Periodic review of emergency procedures and response plans at least annually and revision as appropriate.
- Communication of relevant information to all involved including workers, visitors, contractors, emergency response services, government authorities and the community regarding emergency response.

### **Statistics and Records**

C&M Electric will establish, implement, monitor, and maintain a documented policy statement and procedure to organize, monitor, and regularly measure their OHS performance. OHS performance shall be measured at a specified frequency and:

- Include qualitative and quantitative measurements
- Include leading and lagging performance measures.
- Compare current health and safety performance with past performance.
- Include analysis of statistics and identification of trends.
- Include analysis of first aid treatment records.
- Results shall be recorded and communicated to relevant workplace parties.

### **Legislation**

C&M Electric will establish, implement, monitor, and maintain a documented policy statement and procedure for identifying and complying with all applicable legislation. The procedure will include:

- Identification of applicable legislation, regulations, standards, and any other requirements.
- Methods to ensure compliance with applicable legislation.
- Currency of all documentation related to legislation, regulations, standards, and any other requirements.
- Visible posting or availability of relevant legislation at each workplace as required.
- Evaluation of compliance to legislation at regularly planned intervals and retention of records of evaluations.

### **Management Review**

C&M Electric will establish, implement, monitor, and maintain a documented policy statement and procedure for senior management to review the effectiveness of the OHSMS at regularly planned intervals, and at least annually.

The input to the management review will include:

- Evaluation of the effectiveness of all elements of the OHSMS.
- Status of actions from previous management reviews.
- Results of internal audits, including COR audits.
- Results of participation and consultation with employees/ H&S Representative / JHSC.
- Communication from external parties.
- OHS performance of the organization.
- Evaluation of the extent to which OHS objectives have been met.
- Status of incident investigations, trends identified, implementation of corrective actions, implementation of preventive actions and status of action taken.
- Changing circumstances related to the OHS such as developments in legal requirements or technology.
- Recommendations for improvement.

The output to the management review will include:

- OHS policy updates.
- Measurable OHS objectives.
- Action plan to achieve objectives.
- Required resources.
- Any other elements of the OHSMS as appropriate.
- Communication of the objectives and action plan(s) to all personnel.

### **Change Management**

C&M Electric will establish, implement, monitor, and maintain a documented policy statement and procedure for managing occupational health and safety change. The Change Management procedure will be initiated by:

- Changes in legal requirements.
- Significant changes in work processes, control measures, equipment, company, or work location.
- Introduction of new products, processes, or services.
- Introduction of new developments in OHS knowledge or technology.

Hazard Assessment, Analysis, Control, and Controls will be applied to any identified and significant changes. Where appropriate, we will provide information and training for any affected personnel.

**Record Keeping**

All documents and records generated by the implementation of this policy, will be kept on file. Documents and records will be maintained as per the procedure outlined in the Document and Record Control.

**Training**

Senior Management will ensure that effected employees receive adequate training to ensure the effective implementation of this policy.

**Communication**

Changes resulting from the implementing of this policy, will be communicated to all employees by way of meetings, safety talks, or any other method deemed effective by management.

**Evaluation**

This policy will be evaluated at least annually by management, the JHSC, workers and H&S Coordinator, or their delegate. Evaluations will ensure the policy is compliance with current legislation, industry standards and that the policy is being implemented as required and that it is effective.

## Safety Committees

### Policy Statement

C&M Electric will ensure that a Health and safety representatives be selected by the workers or appointed by trade union, at worksites with five to nineteen employees.

C&M Electric will ensure that a Joint Health and Safety Committee (JHSC) is established when 20 or more regular employees are employed or as ordered by the Ministry of Labour (MLTSD). The JHSC will be formed and will function in accordance with Occupational Health and Safety Act.

In workplaces with less than 50 workers, C&M Electric will require the committee to have a minimum of two members. one worker member and two management members. Where there are 50 or more workers, we will require the committee to have a minimum of four members, two worker member and two management members.

Health and safety representatives and worker members of JHSC will share the same functions; inspect the workplace monthly, identify hazards, assess identified hazards, and make recommendations to management.

Inspections of the workplace will be carried out at least monthly. Where it is not practicable to inspect the entire workplace monthly, a portion of the workplace will be inspected each month such that the entire workplace will be inspected at least annually. Records of inspections will be retained.

Recommendations resulting from review of workplace inspections, observations, discussions, reviews of training programs, worker requests or concerns, will suggest time frames to ensure a timely response to identified hazards.



**Ken Crawford**

President, C&M Electric

January 31, 2023

H&S representatives and JHSC members' names and work locations will be posted on company jobsite health and safety bulletin boards. Where bulletin boards are not practical, names and locations will be posted in the on-site health and safety binder.

JHSC meetings will be held at least every three months. A week prior to the meeting a committee member will post and/or make workers aware as to when and where the meeting will take place. This will give the workers time to notify the committee that they want an issue to be included on the agenda.

Minutes of each meeting will be recorded and made available for review by workers and/or MLTSD inspectors.

### Definitions

Health and Safety Representative – Worker elected to represent fellow workers on health and safety matters where a JHSC is not required.

Joint Health and Safety Committee - 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).

Worker Trade Committee - A worker trades committee represents workers employed in each of the trades in the workplace.

Internal Responsibility System (IRS) - The IRS gives everyone within the company direct responsibility for health and safety as an essential part of their job. Each person takes initiative on health and safety issues and works to solve problems and make improvements on an ongoing basis. They do this both singly and co-operatively with others.

### Forms

C&M Electric uses the following forms regarding Safety Committees:

JHSC Meeting Agenda	SC2 A F2
JHSC Meeting Minutes	SC2 A F3
Health and Safety Representative Agreement	SC2 A F1
Health and Safety Representative Inspection	WI2 A F3
Recommendation Report	SC2 A F4

### Roles and Responsibilities

#### Senior Management

- Ensure a JHSC is established when 20 or more regular employees are employed and to maintain the committee until such time as there are less than 20 regular employees at the workplace or until the project has completed, whichever comes first.
- Ensure that the names and locations of the JHSC members, and alternates, are posted at designated locations determined by the Committee.
- When required, ensure management members and worker members are certified.
- Compensate committee members for time spent performing committee functions.

#### Supervisor

- Support and cooperate with the JHSC and its members.
- Ensure that committee members receive required time to prepare for committee meetings and to perform committee functions.

### **Worker**

- Bring forward health and safety concerns to management or H&S Rep / JHSC members.
- Report any observed actual or potential hazards.
- Report all incidents or injuries.

### **Joint Health and Safety Committee**

- Follow requirements as outlined in the Occupational Health and Safety Act.
- Develop and follow terms of reference regarding how the committee operates.
- Have at minimum 1 certified management and 1 certified worker member on the committee.
- Inspect work areas at least monthly to identify hazards and make recommendations to management on the control of identified hazards.
- Participate in accident investigation.
- Assist with work refusals.

### **Subcontractor**

- Support and cooperate with the JHSC and its members.

### **H&S Representative**

- Hold a valid First Aid Certificate.
- Be familiar with the requirements of the Occupational Health and Safety Act and applicable Regulations.
- Be familiar with our Health and Safety Program.
- Identify hazards, assess identified hazards, and make recommendations to management.
- Attend and participate in health and safety meetings on site.
- Inspect work areas at least monthly to identify hazards and make recommendations to management on the control of identified hazards.
- Assist the supervisor in accident investigation.
- Represent the workers in health and safety matters.
- When requested, assist management in the annual review of the Health and Safety Program.

### **H&S Representative**

The Health and Safety Representative (HSR) has a vital role to play in protecting the health and safety of everyone at the workplace. Having a designated person on the site to deal with any concerns about workplace hazards demonstrates to workers that the employer is committed to protecting them. The HSR is entitled to take time from work to carry out their duties and will be paid their regular wages while performing their duties.

### **Selection of Representative**

- At a project or other workplace, where no committee is required, and where the number of workers regularly exceeds five and is less than 20, we will ensure that the workers select a H&S representative from among the workers at the workplace who do not exercise managerial functions or that the health and safety representative is chosen by the trade union or trade unions, if applicable.
- If no H&S representative is required and no committee is required, the Minister of Labour, Training and Skills Development may, by order in writing, require our management to ensure the workers select one or more H&S representatives from among the workers.

### **Duties and Functions**

- Workplace Inspections:
  - o H&S representatives will 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 H&S representative will inspect the physical condition of the workplace at least once a year, inspecting at least a part of the workplace in each month.

- C&M Electric and workers will provide H&S representatives with information and assistance as required.
- H&S Representative(s) will use our H&S Representative Inspection form to record inspection results.
- Whenever an “A” ranked hazard is observed or is foreseeable, the H&S Representative will instruct the supervisor to immediately stop the work and investigate the hazard.
- A copy of inspection results will be submitted to the supervisor and the JHSC when required.
- Obtain Information from Employer
  - The health and safety representative has the power to obtain information from the constructor or employer concerning tests, if any, on equipment, machine, agents, etc. in the workplace.
  - The HSR may also obtain information related to actual or potential hazards related to materials, processes or equipment used in the workplace.
- Be Consulted on Workplace Testing
  - If the employer intends to do specified testing in or about the workplace that is related to occupational health and safety, the representative has the right to be consulted before the testing takes place. The HSR may be present at the time of testing.
- Make Recommendations
  - The representative has the power to make recommendations to the employer on ways to improve workplace health and safety.
  - Health and safety representatives have the power to identify situations that may be a source of danger or hazard to workers and to make recommendations or report their findings to the employer, the workers and the trade union or trade unions representing the workers.
  - Recommendations resulting from review of workplace inspections, observations, discussions, worker requests or concerns etc., will include time frames to ensure a timely response to identified hazards. The constructor or employer must respond in writing within 21 calendar days to any written recommendations. The response will contain a timetable for implementing the recommendations that management agrees with and give reasons why management disagrees with any recommendations that management does not accept.
  - Management recognizes that the more informed H&S Representatives are, the better recommendations the value of their recommendations will be. Therefore, management will take every effort to ensure H&S Representatives are included in, though not limited to, the following activities:
    - Review of site data and reports.
    - The generation of corrective action plans, both at the company and site level, to include their implementation and follow up through monitoring.
    - Review of company policies and procedures.
    - Identification of necessary training requirements.
    - In training courses delivered by C&M Electric whether they directly pertain to the work performed by the H&S Representative in the normal course of their work tasks.
    - The development of hazard assessment, controls SWP, SWP etc.
- Investigate Work Refusals
  - The health and safety representative must be present at the employer’s investigation of a work refusal unless another worker, who has been selected by a trade union or the workers in the workplace to represent them in work refusal investigations, is present.
- Investigate Serious Injuries
  - If a worker is killed or critically injured on the job, the representative has the power to inspect the scene where the injury occurred and any machine, device, thing, etc. subject to subsection 51(2) of the OHSA. The findings must be reported in writing to a Director of the Ministry of Labour, Training and Skills Development.
- Request information from the Workplace Safety and Insurance Board (WSIB)



- In workplaces to which the WSIA applies, the health and safety representative has the power to request specified types of information from the WSIB (e.g., number of employer's work-related fatalities, number of employer's lost workdays).

### **Joint Health and Safety Committee**

A joint health and safety committee will be required:

- At a workplace at which twenty or more workers are regularly employed.
- At a workplace with respect to which an order to an employer is in effect.
- 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.
- When ordered by the Ministry of Labour, Training and Skills Development. In the event that Ministry orders are received requiring us to establish a JHSC, we will do so in the strictest compliance with the orders received.

### **Composition of Committee**

A joint health and safety committee will consist of:

- At least two persons, for a workplace where fewer than fifty workers are regularly employed.
- At least four persons or such greater number of people as may be prescribed, for a workplace where fifty or more workers are regularly employed.
- At least half the committee members must be worker members: non-management employees at the workplace who are selected by the workers or trade union(s).

### **Selection of Members**

- The members of a committee who represent workers will be selected by the workers they are to represent or, if a trade union or unions represent the workers, by the trade union or unions.
- The constructor or employer will select the remaining members of a committee from among persons who exercise managerial functions for the constructor or employer and, to the extent possible, who do so at the workplace.
- A member of the committee who ceases to be employed at the workplace ceases to be a member of the committee.

### **Certified Members**

- C&M Electric will ensure that at least one member of the committee representing the constructor or employer and at least one member representing workers are certified members.

### **Posting**

- C&M Electric will ensure that the names and work locations of JHSC members are posted in a visible location and on all job sites. The names and work locations will also be included in all on-site safety binder.
- If a certified member resigns or is unable to act, they will be replaced with an equally certified member.

### **Co-chairs**

- Two of the members of a committee will co-chair the committee, one of whom will be selected by the members who represent workers and the other of whom will be selected by the members who exercise managerial functions.
- If the committee has failed to reach consensus after attempting in good faith to do so, co-chair of the committee has the power to make written recommendations.

### **Duties and Functions**

- Identify Workplace Hazards / Workplace Inspections
  - One of the main purposes of the JHSC is to identify workplace hazards, such as machinery, substances, production processes, working conditions, procedures, or anything else that can endanger the health and safety of workers.

- To a substantial extent, this purpose is met by carrying out inspections of the workplace. It may obtain and review specified types of information (e.g., information identifying potential or existing hazards) from the employer so that corrective action can be recommended.
- Unless otherwise required by Regulation or an inspector's order, the Act requires that a designated member of the committee, who represents workers, inspect the workplace at least once a month. In some cases, this may not be practical. For example, the workplace may be too large and complex to be inspected fully each month. Where it is impractical to conduct monthly inspections, the committee must establish an inspection schedule that will ensure that at least part of the workplace is inspected each month and the entire workplace is inspected at least once a year.
- Obtain Information from the Employer
  - The committee has the power to obtain information from the employer, such as information about any actual or potential hazards in the workplace, about the health and safety experience and work practices and standards in other workplaces of which the employer is aware and about any workplace testing that is being carried out for occupational health and safety purposes.
- Be Consulted on Workplace Testing
  - If the employer intends to do specified testing in or about the workplace that is related to occupational health and safety, the joint health and safety committee has the right to be consulted before the testing takes place.
  - A designated member of the JHSC representing workers may also be present at the beginning of such testing if the committee believes that his or her presence is necessary to ensure that valid testing procedures are used or to ensure that test results are valid.
- Make Recommendations to the Employer
  - The committee has the power to make recommendations to the employer and to the workers on ways to improve workplace health and safety.
  - If the committee has failed to reach a consensus about making recommendations after trying to reach a consensus in good faith to do so, either co-chair of the committee has the power to make written recommendations to the constructor or the employer.
  - The employer must provide a written response within 21 calendar days, to any written recommendations from the committee or co-chair. If the employer agrees with the recommendations, the response must include a timetable for implementation.
  - If the employer disagrees with a recommendation, the response must give the reasons for disagreement.
- Investigate Work Refusals
  - The committee members who represent workers must designate one committee member to be present at the investigation of a work refusal.
- Investigate Critical Injuries or Fatalities
  - The members of a committee who represent workers must designate one or more worker members to investigate cases in which a worker is killed or critically injured at a workplace.
  - The designated member(s) may inspect the place where the accident occurred and any machine, device, etc. and report his or her findings to a director and the committee.
- Obtain Information from the Workplace Safety and Insurance Board (WSIB)
  - In workplaces which are subject to the *Workplace Safety and Insurance Act, 1997* (WSIA), at the request of the employer, a worker, committee, health and safety representative or trade union, the Workplace Safety and Insurance Board (WSIB) must provide the employer with an annual summary of information about the employer [subsection 12(1)]. This information must include:
    - number of work-related fatalities.
    - number of lost time injuries.
    - number of workdays lost.
    - number of injuries requiring medical aid but that did not involve lost workdays.

- incidence of occupational illnesses; and,
- number of occupational injuries.
- The WSIB can include any other information it considers necessary.
- When this report is received from the WSIB, the employer must post in the workplace.

### **Preparation Time**

Each member will be paid for one hour of preparation time before every committee meeting. If it becomes apparent that one hour is not sufficient, the committee can decide that more paid preparation time is required.

### **JHSC Meetings**

- Committee members are required to meet at the workplace at least once every three months.
- Committee meetings must be co-chaired by two members. One of the co-chairs is chosen by the members who represents workers, the other by members who represent the employer. The two chairs will alternate chairing the meetings.
- An agenda will be prepared and distributed one week in advance of the meeting date. Members who wish to have items added to the agenda should give chairpersons ample notice.
- Minutes will contain details of all matters discussed, as well as a full description of problems and their resolution or any action deemed necessary.
- Minutes of each meeting must be recorded and available for review by a MLTSD Inspector upon request. Minutes will be retained for a minimum of four years.
- Meeting dates should be scheduled at the conclusion of each committee meeting.
- A copy of the minutes should be distributed to JHSC members a few days after the meeting. If no corrections are required, minutes should be posted and/or made available in the workplace within one week of the meeting.

### **Record Keeping**

All documents and records generated by the implementation of this policy, will be kept on file. Documents and records will be maintained as per the Document and Record Control Policy.

### **Communication**

This policy will be communicated to all C&M Electric employees by way of meetings, safety talks, or any other method deemed effective by management.

### **Evaluation**

This policy will be evaluated at least annually by management, the JHSC, workers and/or 3rd party consultants. Evaluations will ensure the policy is compliance with current legislation, industry standards and that the policy is being implemented as required and that it is effective.

# Early and Safe Return to Work

## Policy Statement

C&M Electric is committed to providing a safe workplace for all workers. In the event of an injury or illness, every possible effort will be made to provide suitable return to work (RTW) options for workers who are unable to perform their regular duties. This policy and the program that supports it will apply to all team members who are absent from work and/or require temporary or permanent accommodations.

We will ensure that injured worker have the best opportunities available for successful return to work with us, or if required, to the labour market.

The return-to-work program will be a collaborative and outcome-based process to assess, plan, implement, coordinate, monitor and evaluate the options and services required to meet an individual's needs.

C&M Electric will provide a re-entry plan for the worker's eventual transition to full employment.

C&M Electric will communication Return to Work and Re-Employment program responsibilities to all involved parties and promptly report work-related injuries to the WSIB.

Documented procedures will address modification of duties based on job tasks and their specific physical demands.

C&M Electric will notify the WSIB whenever worker wage changes i.e., all expenses related to return to work, when there are changes in worker duties, or adjustment to the duration of RTW program. Further notification will be given if there is a failure to cooperate on behalf of any party involved in the plan. All other miscellaneous correspondence and return to full employment/close out etc. will be communicated to the WSIB

C&M Electric has developed a comprehensive policy program to support and ensure compliance to this policy. Each year programs will be reviewed for completion, currency, and effectiveness. When corrections/revisions are deemed necessary, policies, programs, supporting forms etc. will be developed. corrections/revisions will be communicated to workers in a timely manner through posted materials, meeting minutes, toolbox talks, safety meetings etc. Records will be retained as required.



**Ken Crawford**

President, C&M Electric

January 31, 2023

C&M Electric will make every reasonable effort to help an injured employee to stay at work (SAW) or to return to work (RTW) following a work-related injury or illness. The return-to-work program will ensure that as a company we are committed and able to supply modified duties to all employees, where possible, without undue hardship.

The purpose of this policy and program is:

- To provide for the early rehabilitation and return to work of injured employees.
- To provide gainful employment for employees who are permanently disabled due to an injury in the workplace.
- To ensure that all reasonable steps are taken to restore at least the employee's ability to perform the essential duties of their pre-injury job.

### Definitions

Modified Work – Is the modification of an employee's work tasks that allows the employee to carry out the work assignment within the worker's capabilities.

Suitable Work – Work that is safe, productive, and consistent with the worker's functional abilities.

Form 6 - The form provides information on injury/illness details from the employee to the WSIB.

Form 7 - This form will be completed and submitted to the WSIB for every injury/illness involving lost time or modified work. The form provides preliminary information on injury/illness details from the employer to the WSIB and the employee. Submission of this form initiates the process of returning the injured/ill employee to regular duties.

Form 8 – The form that provides the employer and WSIB with clear information from the Health Care Provider about the capabilities and limitations of the employee's current physical condition.

Form 9 - The form that is completed and submitted to WSIB upon completion of all ESRTW plans. Submission of the Form 9 notifies the WSIB that the employee has returned to work or is able to return to work.

Functional Abilities Form (FAF) - The intent of this form is to provide the employer and WSIB with updated information from the Health Care Provider about the capabilities and limitations of the employee's current physical condition.

### Forms

C&M Electric uses the following forms regarding early and safe return to work:

Return to Work Coordinator Package	RTW2 A F1
Applicable WSIB Paperwork (Form 6, 7, 8, Functional Abilities Form, etc.)	

### Responsibilities

#### Senior Management

- Promote and implement an ESRTW program and ensure the policy is updated as required.
- Discuss the plan with the employee's supervisor and ensure that the objective of the ESRTW program is understood.
- Determine the frequency of conducting evaluations of the ESRTW program and the employee's progress in the plan.
- Ensure the employee signs all formal ESRTW plan(s).

#### Supervisor

- Report the employee's injury or illness by submitting a Form 7.
- Remind employee to ask treating physician to give employee a copy of Form 8.
- Contact the injured employee as soon as possible after the injury or illness.
- Work with Management to design the RTW plan.
- Maintain regular contact with the employee during his or her absence from work.
- Try to provide suitable work. Suitable work is work that:
  - o is safe,

- is productive,
- is within the employee's functional abilities, and,
- matches the employee's pre-injury pay as closely as possible.
- Coordinate with the department staff to discuss required accommodation/assistance.
- Meet with the returning employee at the start and end of the first shift to review and discuss any concerns the employee may have.
- Attend regularly scheduled meetings with the employee during the work plan to discuss progress.
- Provide Management with any information requested about the employee's return to work.
- Inform Management about any disputes or disagreements with the employee about his return to work.
- Co-operate in the return-to-work process.
- Conduct an evaluation of the modified work program on a yearly basis, to determine its effectiveness.

#### **H&S / Operations Coordinator (RTW Coordinator)**

- Implement an RTW Plan immediately after the injury or illness occurs.
- Work cooperatively with all parties in identifying and arranging suitable modified work which is consistent with the worker's functional abilities and restores pre-injury wages while on temporary modified work.
- Communicate with the worker as soon as possible after an injury/illness and maintain regular contact.
- Keep accurate records of all aspects pertaining to the plan using the RTW Coordinators package.
- Keep a log of all communication pertaining to the plan.

#### **Workers**

- Get medical treatment immediately after a work-related injury or illness and follow the recommendations of the health-care professional.
- Report your injury or illness to the supervisor as soon as possible.
- Ask treating physician for a copy of Form 8
- Contact the supervisor after the first health-care treatment to begin talking about return to work.
- Stay in contact with the supervisor throughout the recovery and provide him with information on the progress. Try to be in contact regularly and keep a record of when you contact the supervisor.
- Work with the supervisor to identify suitable work opportunities.
- Provide WSIB or equivalent with requested information about the return to work.
- Inform WSIB or equivalent any significant changes in the medical condition or income.
- Significant changes can include:
  - Returning to work.
  - Starting to receive other income or government benefits; or
  - Important updates in the medical condition.
- Inform about any disputes or disagreements with the employer about the return to work.
- Co-operate in the return-to-work process.

#### **Workplace Safety and Insurance Board (WSIB) or Equivalent Board**

- Provide information about the return-to-work process
- Monitor progress and co-operation.
- Get and clarify information on functional abilities.
- Help resolve any difficulties and disputes throughout the process.
- Decide whether the employee need the return-to-work services
- Make all claim-related decisions.

#### **Principles of Modified Work**

C&M Electric recognizes that the temporarily disabled employee can and should be performing meaningful and productive work. The Early and Safe Return to Work program gives structure and organization to this principal and recognizes the employer's and employee's joint responsibility to participate in the rehabilitation of the injured or ill employee. In keeping with

these principles, we will make every effort to ensure the work offered:

- Is productive and the results must have value.
- Will not aggravate or limit the rehabilitation of the injury or illness.
- Will not constitute an additional hazard to the employee or co-employees while performing the assigned duties.
- Must assist the employee in returning to their original position if possible.
- Confidentiality will be a priority with every ESRTW Plan.

### **Early and Safe to Work Plan (ESRTW Plan)**

An ESRTW plan will be developed for each and every employee who is required to have their work tasks modified due to injury or illness. The plan will encompass all aspects of a plan from implementation to closure of the plan.

To ensure the development of a successful plan, Management he will have to review all documents concerning the employee's injuries/illness. Some documents to review may include but should not be limited to:

- Medical Treatment for Injured Employee.
- WSIB Form 6; Form 7; Form 8; Form 9.
- WSIB Functional Abilities Form (FAF).
- Medical reports and records.
- General Guidelines for maximum Medical Recovery.

A plan will be considered closed whenever one of the following criteria has been reached:

- The injured/ill employee has returned to their regular job at full capacity.
- The injured/ill employee has returned to full functional capacity supported by functional ability
- C&M Electric is unable to identify suitable, available work; or,
- The injured/ill employee has been placed permanently in alternative work.

### **Coordinator's Package**

C&M Electric has developed an RTW Coordinators Package to ensure a systematic and fair handling of each RTW plan. One RTW Coordinators Package will be used to document each RTW Plan. The RTW Coordinators Package will include but is not limited to the following:

- The name and contact information of the injured/ill worker.
- The date on which the plan begins and the target date for its expiration.
- The name and contact numbers for the treating physician and WSIB.
- The name of the worker's supervisor(s) while performing duties under the plan.
- A brief overview of the program.
- Procedures for initiating and monitoring a plan.
- A Contact Log that is to be used to log all communications throughout a plan.
- An RTW Return to Work Offer.
- An RTW Agreement.
- An RTW Workers Journal.

### **Procedure**

The following procedure create a framework for our organization and the injured/ill worker to co-operate in developing a RTW and re-employment plan for the worker.

- Management Upon Notification of an Injury:
  - o Provide first aid immediately, if needed.
  - o Arrange for and pay for transportation to a medical facility, if needed.



- Pay workers' wages for date of injury.
  - Complete and submit a form 7 to the WSIB within three days if the injury/ illness involves healthcare treatment or time away from work or lost wages.
  - Investigate the accident.
  - Contact the worker as soon as possible after the injury. Maintain communication throughout the recovery and return to work.
  - Provide return to work information to the worker and review the process with the worker. Attempt to identify suitable work together with the worker. Work that it is safe, within the workers functional physical capabilities and restores the workers pre-injury wages as closely as possible.
  - Develop a RTW plan in all cases where the worker requires ongoing medical treatment, job modifications or accommodations. Document the plan.
  - Provide copies of any RTW plans or related forms to the worker and to the WSIB.
  - Monitor RTW plans by scheduling regular meetings to assess progress, obtain current functional abilities information, and make any adjustments to the RTW plan, as needed.
  - Notify the WSIB of any RTW disputes, changes to wages, type of accommodations or length of RTW plan.
  - Obtain WSIB assistance if the RTW plan is not progressing or if there are difficulties implementing the plan.
- Supervisors Upon Notification of an Injury:
- Initiate early in support of contact with the workers soon as possible after the injury or illness occurs.
  - Provide RTW information to the worker. Review RTW procedures and processes. Remind worker to bring back the completed Injured Worker Package after initial medical treatment.
  - Participate in the development of workers RTW plan.
  - Maintain regular and supportive contact with the worker throughout recovery.
  - Establish a follow-up schedule with the worker and document progress.
  - Obtain support and input from co-workers, as needed.
  - Evaluate success of RTW plan with the worker and implement any necessary adjustments or improvements to ensure long-term success.
- Worker Upon Injury:
- Obtain first aid or healthcare immediately.
  - Report injury/illness to supervisor on the same day or as soon as possible.
  - If healthcare is required or there is lost time from work, confirm that C&M Electric has filed a form 7 with the WSIB and obtain a copy.
  - Complete Workers Report of Injury/Disease (form 6), sent to the WSIB and provide a copy to the main office.
  - Provide any required forms from healthcare professionals to the safety team.
  - Maintain regular contact with the office throughout recovery and attend scheduled RTW meetings.
  - Comply with medical and rehabilitation treatment and arrange appointments during non-work hours, wherever possible.

### **Initiating an ESRTW Plan**

- Set up ESRTW contact log to document all communication involving the injured employee.
- Upon receipt of the Personal Injury Form and the WSIB Form 8, complete and submit WSIB Form 7.
- Prepare a Return to Work Offer letter and have employee sign.
- Complete ESRTW Agreement as per the WSIB Form 8. Explain to the employee that the ESRTW plan will provide temporary modified work until the time when the employee should be able to return to regular duties.
- Supply employee with a copy of the ESRTW Agreement and ESRTW Journal. Be sure to provide instructions to the



employee on how to properly fill out the ESRTW Journal.

- Set an appointment date and time for next meeting, to be held within at least a week.
- Continue to document all communication involving the injured employee using contact log.
- Maintain records of the employee's progress and up-to-date restrictions.
- Attach copies of all correspondence, medical reports, etc. to this plan.

### **Monitoring an ESRTW Plan**

Once the employee commences work under the conditions of the ESRTW Plan, Management will monitor the progress of the plan as follow:

- Contact the employee at least weekly for the first month to ensure the plan is working as anticipated by both parties.
- Ensure the employee is attending all required medical appointments and meetings with C&M Electric.
- Contact the employee's supervisor for progress reports.
- Modify the ESRTW Agreement as per updated FAF's or other reports provided by recognized medical care givers.
- Report immediately to WSIB:
  - o Changes in wages to the employee.
  - o Changes in duties and duration of the plan.
  - o Failure of the employee to cooperate.
  - o Completion of the program.
- Continue to document all communication involving the injured employee using Contact Log.
- Attach copies of all correspondence, medical reports, etc. to this plan.
- An ESRTW plan shall be closely monitored to ensure that the employee's physical restrictions are being fully respected. An ESRTW that exceeds 8 weeks may be considered a permanent position.
- Supervisory personnel may provide modified work for the duration of 5 working days. When changing medical restrictions of an ESRTW plan that has exceeded 5 days, the company physician may be consulted for approval.

### **Work Reintegration (WR)**

Work Reintegration (WR) is a return-to-work process mandated by WSIB through the Workplace Safety and Insurance Act which came into effect July 15, 2011. WSIB WR policies are aimed at ensuring that a worker has the best opportunities available for successful return to work with their employer or, if required, in the labour market.

### **Principles and Concepts**

Appropriate and early work reintegration maintains a worker's dignity and productivity and plays a significant role in their recovery and rehabilitation. A worker's prospects for successful work reintegration both in the short and long term are often best achieved by maximizing opportunities for return to work with the injury employer, including retraining for a suitable occupation (SO) with that employer.

A worker should be offered programs that are of high quality and practical, and the WSIB must provide the worker with meaningful input and choice in relation to the programs offered.

- WR is often part of the recovery plan.
- Report immediately to WSIB:
  - Changes in wages to the worker.
  - Failure of the worker to cooperate.
  - Changes in duties and duration of the plan
  - Completion of the program.
  - Miscellaneous correspondence.
  - Expenses related to the plan.
- Continue to document all communication involving the injured worker using Contact Log.

- Attach copies of all correspondence, medical reports, etc. to this plan.

### **Duty to Accommodate**

C&M Electric has a duty to modify the work or the workplace to accommodate the needs of a worker to the extent of undue hardship. This duty arises through the obligation to re-employ set out in the Act, and/or, the Ontario Human Rights Code or the Canadian Human Rights Act.

### **Obligation to Cooperate**

The workplace parties must co-operate with each other and the WSIB in the RTW process by:

- Initiating early contact
- Maintaining appropriate communication throughout the worker's recovery
- Identifying and securing WR opportunities for the worker
- Giving the WSIB all relevant information concerning the worker's WR, and,
- Notifying the WSIB of any dispute or disagreement concerning the worker's WR.

### **Penalty**

Both workers and employers can be penalized for non-cooperation

### **Employer, requirements concerning re-employment**

Management will comply with the following requirements concerning the re-employment of a worker:

- Management will comply with this policy.
- Management will 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.
- At the request of the worker or the Board, the employer will give written notice to the worker and to the Board of the particulars of the way in which the employer intends to accommodate the work or the workplace to the needs of the worker

### **Presumption, non-fulfillment of employer's obligations**

Management is presumed not to have fulfilled the employer's obligations if the employer re-employs the worker and then terminates the worker's employment within six months after the date on which the worker was re-employed.

Management is presumed not to have fulfilled the employer's obligations if the worker is terminated before their work on the project is completed or within six months after the date on which the worker was re-employed.

Management is presumed not to have fulfilled the employer's obligations if management fails to re-employ the worker at the construction project or at another construction project within six months after the date on which the worker was re-employed although the worker is able to perform the essential duties of their pre-injury employment, and the pre-injury employment, or employment that is comparable to it, is or becomes available at the construction project or at another construction project, or suitable work is or becomes available at the construction project or at another construction project.

Management may terminate the worker, by showing that the failure to re-employ was not related to the injury.

### **Re-employment**

**Worker Medically Able to Perform Essential Duties**

- When management receives information indicating that the worker is medically able to perform the essential duties of their pre-injury employment, then re-employment will be offered to the worker in the worker's trade at the workplace where the worker was injured, if such a position, is available, or is occupied by another worker who was hired, assigned or transferred on or after the date on which the worker was injured; or at a comparable workplace of the employer, if such a position is available.

#### **Worker Medically Able to Perform Suitable Work**

- When management receives information indicating that the worker, although unable to perform the essential duties of their pre-injury employment, is medically able to perform suitable work, then re-employment will be offered to the worker in the worker's trade in a position whose duties consist of suitable work in the worker's trade and classification at a collective agreement workplace, if such a position is available or if there is no position, in a position whose duties consist of suitable work in the worker's trade at a collective agreement workplace, if such a position is available or in a position whose duties consist of suitable work in construction at another workplace of the employer, if such a position is available.
- When management receives information indicating that the worker, although unable to perform the essential duties of their pre-injury employment, is medically able to perform suitable work, then re-employment will be offered to the worker in a position whose duties consist of suitable work in the worker's trade at the workplace where the worker was injured, if such a position is available or if there is no position, in a position whose duties consist of suitable work in the worker's trade at a comparable workplace, if such a position is available.

#### **Work Other than Construction**

- When management receives information indicating that the worker although it is unlikely that they will be medically able to perform construction work again, is medically able to perform suitable work other than in construction, then re-employment will be offered to the worker in a position whose duties consist of suitable work other than in construction, if such a position is available or at the request of the worker or the employer, the Board will provide the worker with a labour market re-entry assessment and, if the Board determines that it is required, a labour market re-entry plan to facilitate the worker's return to work with the employer.

#### **Work Transition Plans**

The WSIB pays expenses that it considers appropriate to enable the worker to engage in work transition assessments and work transition plans. The expenses paid by the WSIB during the work transition assessment consist primarily of the service fees for the assessment/evaluations, interpreters if needed, and travel expenses. Expenses to be paid by the WSIB related to a work transition plan are set out and agreed to before commencement of the plan. These may include expenses for services, tuition fees, books, supplies, special accommodation needs, living accommodation if needed, and travel.

It will be the responsibility of the RTW Coordinator to review and monitor the work transition expenses to be paid by the WSIB. The expenses will be reviewed at least monthly.

#### **Relocation Services**

Relocation is an option that may be considered when a suitable occupation (SO) is not available with the injury employer or in the local labor market. The WSIB pays for appropriate expenses related to the worker looking for work, and relocation expenses when a bona fide offer of employment is secured.

The WSIB will offer relocation services when the following conditions are met:

- Permanent work-related restrictions require the worker to change jobs.
- No SO with the injury employer in the local labour market, or in the surrounding area within a reasonable commuting distance.
- Labour market information indicates there are no SO's in the local labour market with a new employer, and,
- The broader labour market offers greater employment prospects in the SO.

#### **Communication**

The roles and responsibilities of this program will be communicated to all affected workplace parties such as the RTW coordinator, supervisors, injured worker, WSIB, third party consultants and any other workplace party that would be beneficial to this program.

### **Re-employment - Duration of Obligation**

The employer is obligated until the earliest of the following:

- The second anniversary of the date of injury.
- One year after the worker is medically able to perform the essential duties of their pre-injury employment.
- The date on which the worker declines an offer from the employer to re-employ the worker.
- The date on which the worker reaches 65 years of age.

### **Communication**

This program will be communicated to all workplace parties through safety meetings, orientation or by any other method determined by management.

### **Record Keeping**

All documents and records generated by the implementation of this policy, will be kept on file. Documents and records will be maintained as per the procedure outlined in the Document and Record Control.

### **Training**

C&M Electric will ensure that effected employees receive adequate training to ensure the effective implementation of this policy. Training may be formal or informal being delivered either one-on-one with the worker(s), through courses provided by a competent worker and/or through 3rd party trainers.

### **Evaluation**

This policy will be evaluated at least annually by management, the JHSC, workers and H&S Coordinator. Evaluations will ensure the policy is compliance with current legislation, industry standards and that the policy is being implemented as required and that it is effective.

## Appendix 1: List of Applicable Forms

Form Name	Form ID
Accident Investigation Package	INV2 A F1
All Company H&S Meeting Minutes	COM2 A SA10
Audit Summary Report	MR2 A SA12
Change Management Plan	CM2 A SA16
Company Health and Safety Assessment	HA2 A SA2
Confined Space Entry Permit	WT2 A F2
Confined Space Plan	WT2 A F1
Corrective and Preventative Action Plan	INV F 01
Document Change Record	DOC2 A F1
Enforcement Notification	CR2 A F1
EWP & Fall Arrest Inspection	WT2 A F6
Fall Arrest System Inspection	PPE2 A F4
Fall Protection Rescue Plan	WT2 A F3
First Aid Kits Inspection Log	EP2 A F1
First Aid Treatment Logs	EP2 A F2
Health and Safety Representative Agreement	SC2 A F1
Health and Safety Representative Inspection	WI2 A F3
Incident Report	WI3 A F3
Near Miss Report	WI3 A F4
JHSC Meeting Agenda	SC2 A F2
JHSC Meeting Minutes	SC2 A F3
Management Review Minutes	MR2 A SA15
Master Action Plan (MAP)	MR2 A SA13
Medical Treatment Package	EP2 A F4
Office/Warehouse Inspection	WI2 A F1
Preventative Maintenance Schedule	PM2 A F2
Recommendation Report	SC2 A F4
Record of Training	TRA2 A F2
Revisions Report	DOC2 A F2
Return to Work Coordinator Package	RTW2 A F1
Safety Toolbox Talk	COM2 A F3
Site Specific Orientation Checklist	TRA2 A F4
Site Specific Safety Plan	HA1 A F1
Statistics Report	STA A SA11
Subcontractor Agreement	PC2 A F
Subcontractor Management Package	PC1 A F
Supervisor Inspection	WI2 A F2
Tool & Equipment Inventory	PM2 A F1
Vehicle Inspection	WT2 A F7
Violence and Harassment Report	VH2 A F1
Visitor Agreement	COM2 A F5
Worker Orientation Package	TRA2 A F3

## Appendix 2: Terminology and Definitions

<b>Audit</b>	systematic, independent, and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which audit criteria are fulfilled.
<b>Audit program</b>	a set of one or more audits planned for a specific time frame and directed towards a specific purpose.
<b>Conformity</b>	fulfillment of a requirement. For the purpose of this Standard, conformance is synonymous with conformity.
<b>Continual improvement</b>	<p>recurring process of enhancing the occupational health and safety management system in order to achieve improvements in overall OHS performance consistent with the organization's OHS policy, to:</p> <ul style="list-style-type: none"><li>i. enhance OHS performance</li><li>ii. promote a culture that supports an occupational health and safety management system</li><li>iii. promote participation of workers in implementation of actions for continual improvement of the occupational health and safety management system</li><li>iv. communicate relevant results of continual improvement to workers, and where they exist, worker representatives</li><li>v. maintain and retain documented information of the results of continual improvement</li></ul>
<b>Consultation</b>	process by which the organization seeks the views of the workers, worker representatives, and workplace parties before it decides.
<b>Contractor</b>	person or organization providing services to another organization in accordance with agreed-upon specification, terms, and conditions.
<b>Corrective action</b>	action to eliminate the cause of a detected nonconformity or other undesirable situation (for the purposes of this Standard, this refers to any action taken to correct an existing OHS problem or hazard.)
<b>Document</b>	medium containing information related to the occupational health and safety management system.
<b>Hazard</b>	source, situation, or act with a potential for harm in terms of human injury.
<b>Hazard identification</b>	process of recognizing that a hazard exists and defining its characteristics.
<b>Incident</b>	work related event(s) in which an injury, fatality or occupational illness occurred; and includes event(s) where no injury or illness occurred, such as a near hit or property damage.
<b>Interested parties</b>	persons or groups, inside or outside the workplace, concerned with or affected by the OHS performance of an organization.
<b>Internal Audit</b>	is conducted internally by the organization or can be carried out by an external party on the organization's behalf if the organization does not have the internal resources. Note:

the use of an external party for the purposes of internal audit does not replace third party audit requirements for seeking recognition.

<b>Legal requirements</b>	all applicable legislation, including but not limited to the Occupational Health and Safety Act and its regulations.
<b>Non-conformity</b>	non-fulfillment of a requirement.
<b>Occupational Health and Safety (OHS)</b>	conditions and factors that affect or could affect the health and safety of employees or other workers, inclusive of temporary workers and contractor personnel, visitors, suppliers, vendors, or any other person in the workplace.
<b>Occupational Health and Safety Management System (OHSMS)</b>	a coordinated system of procedures, processes and other measures that is designed to be implemented by employers in order to promote continuous improvement in occupational health and safety.
<b>Occupational Illness</b>	as defined in the OHSA, “means a condition that results from exposure in a workplace to a physical, chemical or biological agent to the extent that the normal physiological mechanisms are affected and the health of the worker is impaired thereby and includes an occupational disease for which a worker is entitled to benefits under the Workplace Safety and Insurance Act, 1997.”
<b>OHS Objective</b>	OHS goal, in terms of OHS performance, that an organization sets itself to achieve.
<b>OHS Performance</b>	measurable results of an organization’s management of its OHS risks.
<b>OHS Policy</b>	overall intentions and direction of an organization related to its OHS performance as formally expressed by senior management in relation to the implementation of OHSMS.
<b>Organization</b>	company, corporation, firm, enterprise, authority or institution, or part or combination thereof, whether incorporated or not, public, or private, that has its own functions, management, and administration.
<b>Other requirements</b>	requirements or provisions the organization subscribes, however are not legally binding, such as industry standards.
<b>Participation</b>	involvement of workers, or worker representatives, in decision-making process(es) regarding the occupational health and safety management system.
<b>Plan</b>	detailed method for doing or achieving something.
<b>Preventative action</b>	action to eliminate the cause of a potential non-conformity or other undesirable potential situation (for the purposes of this Standard, this refers to any action taken to fix a potential OHS problem)
<b>Procedure</b>	a documented, specified method to carry out an activity.
<b>Process</b>	a set of interrelated or interacting activities that transforms inputs into outputs
<b>Record</b>	document stating results achieved or providing evidence of activities performed.

<b>Residual risk</b>	combination of the likelihood of the occurrence after the hierarchy of controls has been implemented for an identified hazard.
<b>Risk</b>	combination of the likelihood of an occurrence of a hazardous event or exposure(s) and the severity of injury or occupational illness that can be caused by the event or exposure(s).
<b>Risk assessment</b>	process of evaluating the risk(s) arising from a hazard(s), considering the adequacy of any existing controls, and deciding whether the risk(s) is acceptable.
<b>Senior management</b>	the person(s) at the highest level of an organization's structure responsible for leading, managing and/or directing an organization's day-to-day activities and/or operations.
<b>Third Party Audit</b>	are performed by an external auditor or audit organization independent of the customer-supplier relationship, the employer and/or organization, as well as being free of any conflict of interest. Independence of the auditor or audit organization is a key component of a third-party audit.
<b>Worker</b>	<p>as defined in the OHSA "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:</p> <ul style="list-style-type: none"> <li>i. A person who performs work or supplies services for monetary compensation.</li> <li>ii. 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.</li> <li>iii. A person who performs work or supplies services for no monetary compensation under a program approved by a university, private career college or other post-secondary institution.</li> <li>iv. Such other persons as may be prescribed who perform work or supply services to an employer for no monetary compensation."</li> </ul>
<b>Workplace</b>	as defined in the OHSA, "means any land, premises, location or thing at, upon, in or near which a worker works."
<b>Workplace parties</b>	includes, but is not limited to, the employer, supervisor(s), workers, constructor, and owner.



