



**Joe Johnson  
Equipment**

*Subsidiary Of Federal Signal Corporation*

# **Environment, Health, and Safety Program**

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# Health & Safety Program Introduction

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The “Company” refers to all employees of FST Canada Inc.

**Joe Johnson Equipment** may be represented as “FST Canada Inc.”, “the Employer” or “the Company” at various times throughout this policy manual.

**Employee** may be represented as “the employee”, “employees”, “staff”, “team member”, “the worker” or specified position within the Company at various times throughout this policy manual.

The purpose of the manual is to educate all Company employees on the company’s health & safety policies, procedures and practices, and to ensure compliance with applicable Occupational Health and Safety laws and regulations. All employees must familiarize themselves with the contents of this manual. Changes may be made and/or additional policies may be added as the need is identified by the Company and/or the JHSC, or as required by legislation. The content is to be reviewed at least annually by the JHSC, approved by the General Manager, and then communicated to all employees as revisions or additions occur.

This Program will consist of the following elements:

- Legislative Postings
- Record keeping of required, work specific, certifications
- Facility and Equipment Maintenance inspections and documentation
- General housekeeping requirements
- Contractor Program
- Emergency Response Plan
- Incident Reporting record keeping and analysis

The Company will create policies and procedures to support these elements.

This manual will provide guidance that:

- Defines rights and responsibilities of the Owner, Employer, JHSC, Managers/Supervisors, Workers, Contractors, and Visitors within the framework of Occupational Health & Safety legislation.
- Defines the requirements set forth by the Provincial and State Acts and Regulations regarding health and safety and the reporting of Occupational Injury and Illness.
- Will establish consistent recording and reporting methods.
- Will outline policies, procedures and practices that may be implemented to ensure compliance with applicable legislation.

## Understanding the difference between a Policy, a Procedure and a Practice

**Health & Safety Policy:** The formal guidance needed to coordinate and execute health and safety activity throughout the workplace. When effectively deployed, policies help focus attention and resources on high priority issues, aligning and merging efforts to achieve the company’s safety conscious culture. Policy provides the operational framework within which the institution functions.

If a **policy** is "what" the institution does operationally, then a **procedure and practice** is "how" the Company intends to carry out and implement the company policy. Procedures and practices can be formal or informal, specific to a department or applicable across the entire organization.

**Safe Work Procedure (SWP):** A series of specific steps that guide a worker through a task from start to finish in a chronological order. Safe work procedures are designed to reduce the risk of injury or property damage, by identifying hazards and implementing controls.

**Health & Safety Program Compliance**

Anyone found to be in non-compliance with the Company's Health & Safety policies, procedures and practices will be subject to disciplinary action, up to and including termination of employment depending on the severity of the occurrence.

In the event of a Contractor being found in non-compliance, the Company will take corrective action up to and including severing the contractual relationship.

Any visitor found to be in non-compliance will also be subject to corrective action up to and including removal from the Company premises.

Requests for additional copies of this manual may be made to Human Resources. Copies will be maintained and can be accessed on the employee website; MyJJE.com.

## Health & Safety Program Definitions

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**Employer:** A person who employs one or more Workers or who hires the services of a contractor or subcontractor to perform work or supply services to the Company

**Owner:** Includes a trustee, receiver, mortgagee in possession, tenant, lessee, or occupier of any lands or premises used or to be used as a workplace; **the Company, if the property is owned by FST Canada Inc., the property owner if FST Canada Inc. leases the property**

**Manager:** A person who administers and/or supervises the affairs of a business, office or organization

**Supervisor:** Anyone who directs the work of another

**Worker:** A person who performs work or supplies services for monetary compensation

**Company Representative:** The Owner, General Manager, Manager, Supervisor or Worker of the Company

**Contractor or Contract Worker:** Worker(s) who represents a business to provide a service to the Company, a contractor may have direct Workers or Sub-contractors who work under their Supervision

**Visitor:** A person who enters the Company's premises for the purpose of meeting with a Company Representative

**Competent Person:** A person who is adequately qualified because of knowledge, training and experience to organize the work and its performance and to coach another worker

**The Act:** The Act represents all health & safety legislation and regulations for the province or state in which the Company employees work. Although the Act does not provide methods or process for compliance, it does clearly require the establishment of certain procedures by the workplace parties. The Act does provide legislated procedure for a worker's right to refuse unsafe work, and for the investigation of prescribed accidents and workplace injuries.

# Internal Responsibility System

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The Internal Responsibility System (IRS) is intended to ensure that every person or party at the workplace shares the responsibility for the development and implementation of the Health & Safety Program. Legislation clearly defines the responsibility of the Employer, Owner, Supplier, Supervisor, and Worker at a workplace, as well as JHSC Representatives.

## Owner:

- Prescribed facilities are provided and maintained in good, safe, operating condition
- The workplace complies with provisions of the Act and Regulations, and is not altered or renovated except in compliance with the Regulations

## Employer:

- Acquaint Supervisors and Workers with any hazards in the workplace, including exposure to toxic substances
- Provide information and supervision to a worker to protect the health and safety of the worker
- **Take every precaution reasonable** for the protection of Workers by establishing policies and procedures to deal with potentially hazardous situations
- Review, at least annually, Health & Safety Policies and establish the programs and procedures to implement those policies in the workplace
- Assertion that all levels of management are held accountable for their health and safety responsibilities in the same way they are accountable for any other management functions
- Ensure that equipment, materials and protective devices as prescribed are provided and are maintained in good condition and are used in accordance with Legislation and Company policies
- Co-operate with the JHSC and ensure JHSC reps are qualified to perform these duties
- Monitor and analyze incident data for the purposes of measuring TRIR rates, and identifying safety trends
- Post a copy of Legislation and any workplace inspection documentation

## JHSC:

- Meet at least once every three months at the workplace, or as otherwise agreed, and they shall keep minutes of their proceedings and make them available to a Ministry of Labour Inspector, upon request
- Maintain dedication and commitment to establishing a healthy and safe workplace, and to the integration of health and safety with all company activities
- Identify gaps and trends in the health and safety program
- Make recommendations to the Ownership Group in order to assist in their responsibilities for seeing that all policies and procedures are being followed and all reasonable precautions are taken to prevent illness and injury
- Consultation and cooperation between Managers and Workers for the effective implementation of policy objective
- Involve Human Resources in the development and revision of policies, procedures and practices
- Provide the President with a copy of the Health & Safety Program for annual review and will provide revised parameters/visions for the organization
- Management member of the JHSC will notify the applicable governing body (i.e. Ministry of Labour) concerning health and safety disputes
- Management member of JHSC will notify the Ministry regarding workplace disputes concerning the establishment of a committee, regulations for designed substances, and/or order compliance
- Receive notification by the Company regarding any workplace testing to be conducted, and to be present at the commencement of any testing

**Manager/Supervisor:**

- Establish safe work procedures and provide task specific instruction and observation
- Provide and maintain equipment and protective devices
- Provide required personal protective equipment and clothing and to ensure proper use
- Conduct regular inspections and advise Workers of any known actual or potential hazards
- Report any workplace incidents and illnesses, substandard acts and conditions to the JHSC/Branch Health & Safety Representatives
- Cooperate and respond to the hazards and concerns of Workers and the JHSC/Branch Health & Safety Representatives
- Promote awareness and enforce compliance with legislation as specified in all relevant acts, codes, regulations, standards, and guidelines as well as Company Policies and Procedures
- Take all reasonable precautions to protect Workers

**Accountability – The safety performance of the Manager and the Workers under their supervision will form a part of the Manager’s performance review.**

**Worker:**

- Receive task specific training and adhere to safe work procedures
- Work and act in a manner to protect myself and the health and safety of others
- Wear and use the required personal protective equipment and clothing
- Conduct pre-use inspections of equipment and protective devices
- Report any hazards or concerns, workplace incidents and illnesses, and substandard acts and conditions to my supervisor
- Promote awareness and comply with legislation as specified in all relevant acts, codes, regulations, standards, and guidelines as well as Company Policies and Procedures

**Accountability – The safety performance of the worker will form a part of the worker’s performance review.**

**Contractor:**

- Provide the Company with a completed Contractor Program package including all supporting documentation
- Produce a skilled trade certificate (if applicable) when requested to do so by a Company Representative
- Report to front reception to sign in upon arrival and to sign out upon departure
- Work in a safe manner and comply with legislation as specified in all relevant acts, codes, regulations, standards, and guidelines as well as Company Policies and Procedures
- Obey all signs posted on the Company premises
- Wear personal protective equipment and clothing in specified areas and as required by the task being performed
- Advise the Company’s Project Manager or Designate of all Health & Safety matters which may impact the operation of the Company, including incidents & hazards
- Immediately report any hazards to the Company’s Project Manager or Designate and follow Hazard Reporting procedures as instructed
- Immediately report injuries, illnesses, near misses, or property damage to the Company’s Project Manager or Designate and to follow reporting procedures as instructed
- Co-operate with Company personnel in all matters of health & safety
- Conduct regular inspections of the work area as well as pre-use inspections of machinery and equipment while on Company premises
- Participate in Health & Safety training and meetings when requested to do so
- Participate in a Familiarization Tour and/or Orientation when requested to do so

**Visitor:**

- Report to front reception to sign in upon arrival and to sign out upon departure

- Conduct themselves in a safe manner and comply with legislation as specified in all relevant acts, codes, regulations, standards, and guidelines as well as Company Policies and Procedures
- Be accompanied by or be accounted for by a Company Representative at all times
- Obey all signs posted on the Company premises
- Wear personal protective equipment in specified areas
- Immediately report hazards identified to a Company Representative and follow Hazard Reporting procedures as instructed
- Immediately report injuries, illnesses, near misses, or property damage to a Company Representative and to follow reporting procedures as instructed
- Co-operate with Company personnel in all matters of health & safety
- Participate in a Familiarization Tour when requested to do so

**Provincial Legislation - References:**

Canada Occupational Health and Safety

- <https://laws-lois.justice.gc.ca/eng/regulations/SOR-86-304/index.html>

Alberta Occupational Health and Safety

- <https://www.alberta.ca/ohs-act-regulation-code>

Manitoba Occupational Health and Safety

- <https://www.gov.mb.ca/labour/safety/wshl.html>

Ontario Occupational Health and Safety

- <https://www.ontario.ca/laws/statute/90o01>

Quebec – CNESST

- <https://www.cnesst.gouv.qc.ca/en>

Nova Scotia Health and Safety

- <https://www.novascotia.ca/Just/Regulations/regs/ohsworkplace.htm>



# **Health & Safety Policies**



## Policy & Procedure: P200

### Subject: Health and Safety Orientation

#### PURPOSE

To ensure that all new, transferred or returning employees are provided with general safety in the workplace orientation and training, are made aware of the potential hazards associated with the workplace and to inform and train them on the measures put in place to control or eliminate those hazards.

#### SCOPE

This policy is applicable to all the "Company's" (FST Canada Inc.), newly hired or transferred employees or employees who are returning to their position after a lengthy absence and where the hazards of the work may have changed.

#### POLICY

The Company is committed to Health and Safety awareness to all workers. Every employee shall complete the Health & Safety Orientation training during the first week of hire or return. **The orientation will cover the topics listed below:**

- Health & Safety Program
- Facility Safety Orientation Tour
- WHMIS (HAZCOM)
- Workplace Violence, Harassment and Sexual Harassment Prevention and Reporting Program
- Occupational Health and Safety Awareness Training (designated training for Workers, Supervisors, and Young Workers)
- Any legislative safety training that is specific to the province or state that the employee works in

#### DEFINITIONS

The "Company" - FST Canada Inc., operating as various business entities

#### ROLES AND RESPONSIBILITIES

The following responsibilities apply:

##### Employer will:

- Ensure the development, implementation and maintenance of the Health and Safety Orientation Program
- Ensure time and resources are available to conduct general and site-specific safety orientations
- Communicate with managers and supervisors on their responsibilities regarding the Health and Safety orientation
- Provide Health and Safety Orientation Training and maintain training records
- Review the adequacy of the orientation program and all orientation instructions annually

##### Manager/Supervisors will:

- Ensure that all applicable employees and workers have received the appropriate health and safety orientation and facility safety tour
- Ensure that all applicable employees and workers have adequate time within the first week to complete the required orientation and the appropriate health and safety training

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- Ensure that the completed documentation is forwarded to Human Resources (who will maintain the records) within the first week of employment

**Employees will:**

- Participate in orientation program to receive essential health and safety information vital to their safe work performances
- Question any area(s) of the orientation they may have misunderstood
- Contribute to their own, as well as others safety by participate in further training and/or orientation as required
- Perform work as described in the orientation programs as well as all appropriate job specific safe operating procedures

**Joint Health and Safety Committee (JHSC)/Health and Safety Members will:**

- Be consulted about the development, establishment and implementation of Health and Safety Orientation program
- Make recommendations to the employer for developing, establishing and providing training in health and safety awareness
- At least once a year, take part in a review of the Health and Safety Orientation policy

**Human Resources will:**

- Ensure that all their employees have received the appropriate health and safety orientation
- Maintain records that orientations have been complete for all employees

**PROCEDURE**

- A member of the HR Team will contact the hiring Manager and new employee via email with a schedule to participate in an orientation session within their first week of employment. This will be delivered via webex/teleconference communication, and through online training modules and assessments
- Employees new to the Company will be provided a Welcome Package which includes a Training Orientation Instructions listing the required training and training methods
- If an employee is transferred from one workplace to another, they are required to receive orientation training, specific to that site.
- Employees will participate in a Safety Orientation tour with a member of the HR Team or Manager at their facility to address hazards and controls specific to the new hire's job position
- Employees will review the Health and Safety Manual
- Employees will complete the required Online training
- Managers/Supervisors will review the applicable Standard Work Procedures (SWP's) relative to the new hire's job position
- Upon completion of the Health & Safety orientation, employees are required to forward to Human Resources a copy of the **Health & Safety Orientation Acknowledgement Form**

**COMMUNICATION**

Any of the following method(s) may be used to communicate this policy:

- Company email
- Company memo
- Online
- Posting of policies and procedures
- Training
- Meetings and Safety talks

**TRAINING**

The Company will ensure that all employees are trained and educated on the Company's Health and Safety Program, and that they are clear about their roles and responsibilities as well as this policy and its procedures.

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Legislative training will be facilitated through an Online Training platform. Internal Training will be facilitated through the Company's intranet platform, MaJE.

Completion will be validated based on the passing results of the quiz taken at the end of each training module. Quiz results will be tracked electronically and filed.

## **EVALUATION**

A yearly evaluation of the health and safety orientation program will be performed by Human Resources to determine if all applicable staff have been trained, if there are any weaknesses in the program or if organizational changes in the company require amendments.

## **EXHIBITS/FORMS**

F200.1 Health and Safety Orientation Tour Checklist  
New Hire Orientation Training Brochure

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## Policy & Procedure: P201

### Subject: Joint Health and Safety Committee (JHSC) and Health and Safety Representatives (HSR) Program

#### PURPOSE

The purpose of this policy is to establish ground rules for the creation and efficient operation of a Joint Health and Safety Committee or Health and Safety Representatives (HSR) in the workplace. It is intended to educate all employees on the roles and responsibilities of a Joint Health and Safety Committee (JHSC) or Health and Safety Representatives (HSRs) in the workplace.

#### SCOPE

This policy is applicable to all employees of the “Company” (FST Canada Inc.).

#### POLICY

The Company shall have Health and Safety Representatives (HSRs) or a Joint Health and Safety Committee (JHSC) where legislated. The JHSC or HSRs will act as the entity that meets the requirements as set out in the Occupational Health and Safety legislation. The JHSC or HSRs key functions are to:

- Identify hazards in the workplace through activities like workplace inspections, accident investigations and information analyses
- As an internal advisor to the Company, assist in developing standards, rules and/or procedures relating to health and safety to improve and ensure workers health and safety at the workplace.
- Make recommendations to the employer on health and safety issues and on programs and procedures to improve health and safety

The JHSC/HSRs will be structured in accordance with the OHSA and at least half of the members must be workers who do not exercise managerial functions; the workers must select these members.

JHSC members are expected to remain with the committee for a minimum 1-year term. Specific responsibilities of the JHSC are listed in the Internal Responsibility System section of this manual.

The Company considers the Joint Health and Safety Committee or Health and Safety Representatives to be a valuable partner in its efforts to identify, assess, and control workplace hazards and requires all personnel, including managers, supervisors, and workers to support its work and obey the provisions of this Policy.

#### DEFINITIONS

**The “Company”** - FST Canada Inc., operating as various business entities.

**Health and Safety Representatives** – In workplaces, at which the number of workers regularly exceeds five and at which no joint health and safety committee is required, employers must ensure that workers select a health and safety representative (HSR).

Workers at the workplace from workers who do not exercise managerial functions select an HSR.

**Joint Health and Safety Committee (JHSC)** – In the Canadian legislation, health and safety committees may use slightly varying names. For the purpose of this policy, we will use the name Joint Health and Safety Committee. The committee may also be known as the joint work site health and safety committee, occupational health committee, workplace safety and health committee, or occupational health and safety committee.

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A Joint Health and Safety Committee is a forum for bringing the internal responsibility system into practice consisting of worker and management representatives who meet on a regular basis to deal with health and safety issues.

**Workplace Inspection** – a critical examination of the workplace, inspections help to recognize, assess, control and evaluate hazards in the workplace and are conducted monthly as prescribed by legislation and regulation. Inspections will involve management, workers, and JHSC member or HSR.

**Hazard** – any source of potential damage, harm or adverse health effects on something or someone under certain conditions at work.

**Accident Investigation** – when a designated person who has been trained in investigation and reporting, investigates the details of an incident/accident to establish a series of events that should have taken place and compares it to what actually happened to identify areas such as workplace policies or procedures, or hazard control measures that need improvement.

**Health and Safety Board** – an area (bulletin board) ideal for posting legislated safety documents that is located conspicuously, which is accessible to all employees. More than one (1) board may be required in areas (facilities) with limited or restricted access.

## ROLES AND RESPONSIBILITIES

The following responsibilities apply:

### Employer will:

- Ensure each location is equipped with a Joint Health & Safety Committee or Health & Safety Representatives to address health and safety concerns in the workplace
- Provide information that the committee (or HSR) have the power to obtain
- Respond to recommendations in writing within 21 days, and include an implementation timetable or reasons for disagreement, if any
- Provide copies of all orders and reports issued by the MOL inspector
- Report any workplace deaths, injuries or illnesses to the JHSC or HS

### Human Resources will:

- Help to promote an awareness of health and safety issues and an atmosphere of cooperation between management and workers
- Monitor and analyze workplace inspection reports and incident reports to identify safety trends

### Joint Health and Safety Committee (JHSC)/ Health and Safety Representatives (HSR) will:

- Meet once per month or at least once every three months or as minimally prescribed per legislation
- Inspect the workplace at least once per month and document findings
- Review the monthly inspection reports, checklists
- Identify trends that will proactively address emerging health and safety issues employee comments and concerns
- Help in identifying problems, formulating policy and procedures, monitoring and improving workplace health and safety and support the JHSC in presenting recommendations
- Investigate accidents where there is a critical injury or death
- Represent a worker during a work refusal
- Accompany a Ministry of Labour Inspector or respective Government Health and Safety Inspectors
- Be consulted about and be present at the beginning of health and safety-related testing in the workplace

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## Joint Health and Safety Committee (JHSC) Roles

### Certified Members

At least one member representing both workers and managers must be certified; however, you may have more than one, or all members certified (this is recommended). Where more than one certified worker and/or management member exists, you must designate one or more certified members to become solely entitled to exercise rights and duties of certified members. (S. 9(15))

### Co-Chairs

Committees must be co-chaired by two members. One of the co-chairs must be selected from members representing workers, and management will select the other.

The meeting chair is responsible for preparing a meeting agenda and running that meeting. Co-chairs should alternate the meeting chair responsibilities.

- Jointly prepare and circulate the agenda in advance of an upcoming meeting
- Ensure that a meeting schedule is developed and accessible to all employees
- Arrange for special speakers/resource specialists
- Ensure that the responsible/appropriate manager will follow up on action items and shall track completed actions in the management log. If follow up is not successful, the action item will be raised with the management team

### Secretary

One member of the JHSC should be designated as the secretary. This member will take meeting notes, which include concerns, recommendations, and suggested actions. The clerk may also fulfill administrative duties such as ensuring meeting minutes are posted on the health and safety board or writing up recommendations to submit to the employer. Taking accurate minutes is a very important function, as the Ministry of Labour would most certainly request to see them during any inspection.

- Recording and preparing of minutes that will be shared among committee members
- A standard format for the minutes will be used, listing items, brief discussion notes and action points
- Posting of names and work locations of members
- Maintain JHSC bulletin board, including JHSC committee members, posting of minutes and inspection reports

## PROCEDURES

### COMPOSITION OF JHSC

A JHSC is a legal requirement for locations with 20 or more employees. Each province has their own legislation composition as per below:

Province	Committee Name	# of People on Committee	Composition of Committee
Alberta	Joint Work Site Health and Safety Committee	At least 3 and not more than 12	At least two employees and one employer or at least half employees
Manitoba	Workplace Safety and Health Committee	At least 4 and not more than 12	At least half to represent employees
Nova Scotia	Joint Occupational Health and Safety Committee	As agreed, upon by employees and employer	Equal representation

Ontario	Joint Health and Safety Committee	At least 2 (fewer than 50 employees); At least 4 (more than 50 employees)	At least half to represent employees
Quebec	Health and Safety Committee	At least 4	At least half to represent employees

### COMPOSITION OF HEALTH & SAFETY REPRESENTATIVES

For Company locations with less than 20 employees, a minimum of 2 members are required; at least one manager representative and one worker representative.

### SELECTION PROCESS

#### Joint Health and Safety Committee Members

**Selection of Worker Members** - Employees who do not exercise managerial functions are responsible for the selection of the worker members through an election/nomination process. Notice of vacancies will be communicated to all staff and eligible candidates' names will be forwarded to the Worker Co-Chair for inclusion in the voting process.

**Selection of Employer Members** - A member of the Company's senior management shall appoint the management member(s). The Management Co-Chair shall be appointed by management.

***If workers are given the opportunity to select worker members but do not do so, the Company will seek out and assign persons to act as worker members.***

#### **Certified Members**

- Certified member representing Management shall be appointed by management
- Employees who do not exercise managerial functions are responsible for the selection of the worker certified members through an election/nomination process

#### Health and Safety Representatives

**Selection of Worker Members** - Employees who do not exercise managerial functions are responsible for the selection of the worker members through an election/nomination process. Notice of vacancies will be communicated to all staff.

**Selection of Employer Members** - A member of the Company's senior management shall appoint the management member(s).

### MEETINGS

- Meetings will be held on a monthly basis and occasionally at other times as recommended by the committee
- A schedule of meetings will be drawn up annually and communicated

### MONTHLY WORKPLACE INSPECTIONS

- At least one Worker member accompanied by a management member (whenever possible), will complete a monthly inspection of the facility, and will review the Company's previous month's inspection report as a tool to follow up on previously identified items

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- Serious hazards requiring immediate action will be brought to the attention of management at the time of the inspection
- A completed Workplace Inspection Report will be reviewed and discussed at each scheduled JHSC or Safety meeting. Items requiring corrective action will be assigned to JHSC members, HSR, staff members and/or directors as appropriate

#### **JHSC RECOMMENDATIONS**

- The purpose of JHSC Recommendations is to inform the employer, in a formal way, of potential or existing health and safety issues that have been identified, and make recommendations for corrective action
- The JHSC can issue formal recommendations to management at any time utilizing the “JHSC Recommendations Form”

#### **ACCIDENT INVESTIGATION**

- Worker members will participate in accident investigations
- Recommendations for preventing future injuries and accidents will be brought forth using the JHSC recommendation process

#### **COMMUNICATION**

This procedure will be communicated to all JHSC via e-mail or in person.

Any of the following method(s) may be used to communicate this policy:

- Company email
- Company memo
- Posting of policies and procedures – Meeting Minutes and Inspections
- Posting of JHSC/HSR Member names and work location
- Training
- Meetings and Safety talks

#### **TRAINING**

The Company will ensure that all JHSC members and HSR are trained in accordance with their respective provincial legislation. By review of this policy and procedures, they will be about their roles and responsibilities.

Training is called JHSC (HSC) Part (Level) 1 and Part (Level) 2. Trained members of the JHSC are called 'Certified Members'. Certification training will be completed for a minimum of one management representative and one worker representative.

If Certification training not required by legislation, the Company will provide internal training on: JHSC (HSR) membership, Internal Responsibility, Hazard Identification, Workplace Inspections, and Accident Investigations.

#### **EVALUATION**

- Posting of minutes and inspections / Member names and work location

#### **EXHIBITS/FORMS**

- F201.1 JHSC Terms of Reference
- F201.2 JHSC Membership Acknowledgement
- F201.3 JHSC Recommendation Form
- F201.4 JHSC/Health & Safety Representative Nomination Form

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## **Policy & Procedure: P202**

### **Subject: Worker's Rights**

#### **PURPOSE**

To balance the employer's general right to direct the work force and control the production process in the workplace, Legislation gives three basic rights to Workers – the right to participate, the right to know and the right to refuse.

#### **SCOPE**

This policy is applicable to all employees of the "Company," (FST Canada Inc.).

#### **POLICY**

The three basic rights of Workers are as follows:

##### **The Right to Participate**

Workers have the right to be part of the process of identifying and resolving workplace health and safety concerns. This right is expressed through worker membership on JHSCs, or Workers identifying the concerns to one of the health and safety representatives.

##### **The Right to Know**

Workers have the right to know about any potential hazards to which they may be exposed. This means the right to be trained and to have information on machinery, equipment, working conditions, processes and hazardous substances. The parts of the Act that implement the Workplace Hazardous Materials Information System (WHMIS)/ Hazard Communication (HAZCOM), or applicable Hazardous Material legislation, play an important role in giving Workers the right to know.

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

Workers have the right to refuse work they believe is dangerous to either their own health and safety or that of another worker. The Act describes the exact process for refusing dangerous work and the responsibilities of the employer in responding to such a refusal.

##### **Dangerous Circumstances**

Management, JHSC/Branch Representatives can stop work in "dangerous circumstances". This means a situation in which all of the following apply:

- The Act or regulations are being contravened
- The contravention poses a danger or hazard to a worker
- Any delay in controlling the danger or hazard may seriously endanger a worker

#### **PROCEDURE**

Work refusals can be associated with a failure to communicate concerns about unsafe conditions to the Employer, Supervisor or to a Worker. The Company encourages the reporting of unsafe work, so that we may promptly investigate and take remedial action or implement the corrective measures that may be needed. If these initiatives fail however, work refusal procedures must be followed.

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**First Stage:**

**Worker:** When a worker “has reason to believe” the work performed is causing injury, illness or is likely to endanger themselves or another worker, the worker will promptly report the circumstances and the intent to refuse the work to his/her supervisor. The refusing worker is to remain in a safe place near the work location, while an investigation of the refusal takes place.

**Supervisor:** When a Worker has reported their intent to refuse unsafe work, the Supervisor will confirm the Worker’s “reason to believe” and will immediately notify the JHSC/Branch Representative (Worker member) to “attend without delay”. The Supervisor must then investigate the circumstances of the refusal and must do so in the presence of the refusing worker, and the JHSC/Branch Representative (Worker Member).

The Supervisor is entitled to retain and acquire such assistance as may be necessary for the effective investigation of the refusal, but it is important to remember that a supervisor’s legislated duties during the course of a work refusal cannot be delegated.

If the circumstances or conditions that led to the refusal are resolved to the worker’s satisfaction at this initial stage, the worker is expected to return to work and commence the performance of his/her normal duties.

If the circumstances of the work refusal are not agreeably resolved, then the worker may choose to continue to refuse the work but must now provide “reasonable grounds” that the conditions remain likely to endanger him/herself, or another worker.

In this case, the HR Manager or Senior Manager on-site will contact the Ministry of Labour (or equivalent based on state/provincial regulations) to report the situation and request that an Inspector be assigned to attend the workplace and investigate the circumstances of the refusal.

**Second Stage:**

The Inspector will attend the workplace or may provide direction over the telephone for interim action to be taken pending their arrival.

**Worker:** When a worker continues to refuse work after the initial investigation by the Supervisor, the worker must provide those investigating with “reasonable grounds” to suggest that the work conditions are likely to continue to endanger. The worker may be assigned other reasonable alternative work pending the investigation and decision by the Inspector, or must otherwise remain in a safe place, as directed.

**Supervisor:** In circumstances where a worker continues to exercise his/her right to refuse based on “reasonable grounds”, the Supervisor will make every effort to assign the refusing worker reasonable alternative work while waiting for the arrival of the Inspector. In the event that the alternative work cannot be found, the Supervisor will assign the worker to safe place, to await further direction.

**It is important to note that, at this stage, another Worker may be asked to perform the work refused by the refusing worker (unless directed otherwise by the Inspector), but only if the Worker being asked is notified of the initial refusal and the reasons for the refusal.**

Where the Supervisor can ensure that such action may be undertaken in a safe manner, and that every precaution reasonable in the circumstances has been taken to protect Workers, then he/she may ask another worker to perform the work that was refused.

The Supervisor will only make this request while in the presence of the JHSC/Branch Representative (Worker Member).

**Inspector:**

Upon arrival at the workplace, the Inspector will investigate the circumstance to the refusal in the presence of the refusing worker, the Supervisor, and the JHSC/Branch Representative (Worker Member).

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Upon the completion of the investigation, the inspector will render a decision in writing whether the machine, device, thing, workplace or part thereof in question, “is likely to” or “is not likely to” endanger the refusing worker, or any other worker. If the decision is “likely to endanger” the Inspector will issue appropriate orders for compliance.

The Inspector will provide copies of his/her decision to the worker who refused, the employer, and to the JHSC/Branch Representative (Worker Member). A copy must be provided to the Company’s Human Resources Department and a copy must be posted in the workplace.

**General Provisions:**

Where a Worker has refused to perform work in accordance with legislation the Company will make every effort to resolve the refusal amicably, effectively, and promptly. The Company will ensure a safe location for a refusing Worker to remain during the course of the initial investigation. In the instance of a second stage refusal, we will assign the refusing worker to reasonable alternative work that will not be demeaning or disciplinary in nature, pending the Inspector’s decision.

No employee involved in the conduct of work refusal will lose any pay for the time spent regarding this situation.

No reprisals of any kind will be taken against any worker involved in a legitimate work refusal conducted in accordance with the provisions of legislation.

Work refusals are a serious indicator of a break down in the Company’s Health and Safety Program and the Internal Responsibility System. Every work refusal will be investigated appropriately to determine the causes and failure of the system, and to determine corrective measures to prevent re-occurrence.

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## Policy & Procedure: P203

### Subject: Contractor Safety Program

#### PURPOSE

To ensure all Contractors are aware of their role in the Internal Responsibility System and understand and accept their health and safety responsibilities to maintain a safe environment for all employees and Workers while working for the “Company” (FST Canada Inc.) and on the Company premises.

#### SCOPE

This policy is applicable to all Contractors, Sub-Contractors and any Company employee who engages a contractor to perform work for the Company.

#### POLICY

This policy covers a wide range of security and safety related activities that may or may not be applicable to the entire scope of work the Contracted firm, and its employees, are being hired to perform. The Contracted firm’s representative reviewing this document must identify and ensure all sections that apply to the scope of the work that their Workers will be performing, is understood and that the required actions are taken by the Contracted firm to ensure all the workers supplied to the Company are competent to perform the work in a safe manner.

Except for emergency services, the Contracted firm representative will be required to review, complete all forms, attach supporting documentation, and return the completed package to the Project Manager before performing any work at the Company.

**Contractors** must report to the front reception desk upon arrival and will be requested to read the Contractor General Workplace Safety Requirements section of this document. Once complete, the Contractor will acknowledge that they understand the Company’s expectations by signing in using the **Visitor’s Log**. Contractors must visibly wear a Visitor’s Badge beyond the reception area and for the duration of the visit.

Upon leaving the Company premises, contractors must report to Reception/Office Administrator and sign out in the Visitor’s Log.

#### DEFINITIONS

**Contractor:** A person, partnership, or group of persons who, through a contract, an agreement, or ownership, directs the activities of one or more employers or self-employed persons involved in work at a work site.

**Project:** The construction, demolition, repair, alteration, or removal of a structure, building, pipeline, sewage system, or electric, telecommunication line; the installation, modification, repair, or removal of any equipment, machinery; or any work designated by a Company Project Manager.

**Project Manager:** A person designated by the Company in overall charge of the planning and execution of a particular project or work performed on the Company premises.

**Competent Person:** in relation to specific work, means a worker who,

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

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**Scope of Work:** Scope of work is a written document containing a detailed description of a job contract.

**SCOPE OF WORK**

Having a complete and clear scope of work before initiating the project allows the Company and the Contracted firm to accomplish project goals under the expected timeline while reducing potential misunderstandings and conflicts. A clear scope of work will be provided by the Contracted Firm to the Company’s Project Manager and include a brief, general description of the projected work, methodologies and tools used.

The Contract firm will ensure their subcontractors and/or workers have been trained on the tasks associated to the scope of work identified.

**RESPONSIBILITIES**

To maintain a positive and safe working relationship between Contractors and the Company, all parties must meet their obligations set out in the program.

**Employer/ Company:**

- Ensure that projects are defined and are approved by senior management prior to engaging in a Contracted firm
- Ensure that the scope of the work follows the Health & Safety Legislation for the province or state in which the work is being performed
- Provide training to Project Managers to deem them competent to oversee the Contracted firm and understands their roles and responsibilities
- Review the Contractor Program annually

**Project Manager:**

- Ensure the Contractor is listed in the Company Approved Contractor Database prior to hire
- Confirm a completed and up-to-date Contractor Program package is on file for the Contractor prior to work commencing
- Send a Contractor Program package to a Contractor under consideration for hire when it is identified that the Contractor is not listed in our Contractor Database or when their information is expired
- Obtain a copy of the Contract Worker’s skilled trade certificate (if applicable – i.e. Electrician, Plumber, etc.)
- Ensure all Contract Workers read and understand their Health & Safety responsibilities
- Review check-in procedures with Contract Workers
- Review emergency response and evacuation procedures including alarms and meeting place/muster point with Contract Workers
- Ensure Contractor’s Workers are working in a safe manner and are compliant with all the Company’s Health & Safety requirements, rules, regulations & applicable legislation
- Review hazards in the workplace and provide instruction on Hazard Reporting procedures to Contract Workers
- Provide instruction on reporting procedures for injuries, illnesses, near misses, or property damage to Contract Workers
- Provide an orientation to Contract Workers using the Contractor Site Orientation Acknowledgement checklist

**Contractors:**

- See Contractor Responsibilities in the Internal Responsibilities Section of this manual

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## CHECK-IN PROCEDURES

Due to the varying levels of Contractors based on the services they provide it is important to define and establish specific check-in procedures for each classification of Contractor. The Project Manager responsible for the Contractor will determine the level and check-in procedure for each Contractor based on the scope of the project. This will be established at each contract negotiation.

**Level 1** – Contractors who access the Company grounds but not premises (i.e., Lawn maintenance, couriers) are required to notify Reception of their arrival and departure. This level of Contractor is not required to sign in and out.

**Level 2** – Contractors who access the Company’s premises but do not perform high risk tasks, (Office equipment maintenance/repair, uniform supply service) are required to read the General Health and Safety Responsibilities and sign in and sign out at front reception.

**Level 3** – Contractors who access the Company’s premises to perform higher risk/skilled trade repairs (Electrician, plumber), or who are usually onsite for more than 1 consecutive day, (Camera installers, building repair/renovation contractors) are required to read Contractor responsibilities, sign in and out at front reception, produce trade certificate/license upon request and participate in an orientation with the Project Manager.

The Project Manager will conduct routine check-ins with the Contractor to verify the progress of the project and confirm the use of proper personal protective equipment and safety procedures.

## GENERAL WORKPLACE SAFETY REQUIREMENTS FOR CONTRACTORS

The Company is committed to building and preserving, for its employees, a safe work environment based on mutual respect which is **free from violence, threats of violence, discrimination, harassment of any kind, or intimidation.** All other persons: contractors, suppliers, customers, and visitors to the Company must also comply with legislative requirements and the requirements of this policy. Individuals failing to abide by this policy will be promptly removed from the properties(s).

### The Contractor will:

1. Appoint a competent person to supervise work and whenever requested to do so, provide the Company with certificates of training through a recognized industry organization as evidence of the individual’s competence
2. Ensure that all workers employed to carry out the scope of the work are properly trained, possess the knowledge, skills and protective devices required by law or recommended for use to allow them to work safely
3. Not operate any equipment owned or operated by the Company and must provide all tools and/or equipment required to perform their work
4. Not be under the influence of, or in possession of any alcoholic beverages or illegal drugs
5. Obey all signage and instructions
6. Report injuries and incidents to the designated Company’s Project Manager in accordance with the OHS Act as soon as possible and participate in investigations of injuries and incidents as requested.
- 7. Follow all safety guidelines and precautions in place at the facility**
8. Co-operate with any person exercising their duty under the act, the regulations, or the code and comply with the act, the regulations, and the code
9. Treat all employees with respect and abide by this policy while conducting business at the Company’s workplace

### WHMIS/HAZCOM

#### The Contractor will:

1. Comply with the requirements of WHMIS/HAZCOM legislation regarding the use, handling, storage and disposal of hazardous materials
2. Ensure that all controlled products used in performing the work are appropriately labeled

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3. Maintain, at all times during the work, copies of material safety data sheets for controlled products on site in an easily accessible location
4. Provide their Workers with the appropriate personal protective equipment required

Further to the requirements of WHMIS/HAZCOM, the Contractor will ensure that the application of flammable or toxic materials is commenced only after the following requirements are met:

- Adequate ventilation is provided during and after application
- Enclosures are provided, when required, to contain fumes/vapours within the application area
- The building heating, ventilating and air-conditioning system will not distribute fumes/vapours throughout the building
- Warning signs and barriers, as required by regulations or to prevent entry into the application area, are used
- Workers are provided with the necessary respiratory protection devices to safeguard their health
- A suitable number of fire extinguishers are immediately adjacent to the area of application for volatile and flammable materials
- All information regarding the handling of materials, avoidance of spills, cleanup, installation of materials, ventilation, or other features designed to minimize the level of worker exposure to airborne contaminants are appropriately communicated

**PROTECTIVE CLOTHING, EQUIPMENT AND DEVICES**

The Contractor shall maintain on-site compliance with all requirements respecting protective clothing, equipment and devices.

**FALL PROTECTION**

The Contractor shall maintain on-site compliance with all requirements regarding fall protection and shall use fall arrest protection devices when working at elevations of 6 feet or higher.

The Contractor is solely responsible for the training of their Workers who are using fall arrest equipment and working from heights. All fall arrest equipment will be supplied by the Contractor.

**HOUSEKEEPING**

The Contractor shall implement a daily job site clean-up program to maintain the work site in a tidy and safe condition. All work areas, stairways and walkways are to be kept clean and free of obstructions. Material must be piled or stacked in an orderly manner.

**CONFINED SPACE**

The Contractor is solely responsible for the training of their Workers who are required to work in confined spaces. The Contractor shall ensure if the work involves entering a confined space, that safe procedures are followed and that proof of competency of workers entering confined spaces is readily available.

**LADDERS**

The Contractor is solely responsible for the training of their Workers who are using ladders and must ensure that ladders are designed, constructed, installed and maintained in a manner consistent with all regulatory requirements.

**ELECTRICAL/MECHANICAL**

The Contractor will ensure:

1. Qualified competent workers holding a valid skilled trade license perform all work on or near electrical equipment or installation
2. All electrical equipment in use during performance of the work is appropriately designed, located, and inspected so as to prevent a hazard to workers or others
3. All workers performing work on or near electrical equipment and/or installations are provided with, and use, appropriate personal protective equipment
4. All work performed on electrical installations must comply with all relevant acts, codes, regulations and guidelines
5. All Plumbing & Mechanical work must comply with all relevant acts, codes, regulations and guidelines

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6. Any hazards arising from the worker's maintenance or repairs of electricity are to be reported to the Company's Designate immediately to ensure protection of all employees and workers

#### **LOCK OUT**

The Contractor is solely responsible for the training of their Workers who are locking out equipment and shall maintain on-site compliance with all requirements regarding lockout procedures. Should the Contractor be required to perform repairs on the equipment which has been locked out, the Contractor's worker will report to the Lead Manager to review the hazards of the equipment and reason for lock out.

If maintenance or repair cannot be completed, ensure that the equipment remains locked out and post signs warning "UNDER REPAIR – DO NOT OPERATE" prior to leaving the equipment and report this to the Company's Project Manager to ensure locks and tags are applied.

Upon completion of repair or maintenance, the worker will report to the Lead Manager to verify if the equipment is back to full and safe operation. Once the contract worker and Foreman/Manager agree that the equipment is safe, the internal lock out tag out process will be completed, and the equipment rendered available for use.

#### **LIFTING**

No worker is to lift over 20 kg independently - should assistance be required; the contract worker is to notify the Project Manager.

#### **FIRE PREVENTION**

Firefighting equipment shall not be moved, blocked or otherwise made inaccessible. Pre-authorization is required and must be obtained from the Company for all work that involves welding, cutting, grinding, use of open flames or any other operations where there is a risk of fire.

When welding or cutting must be done in a location not designated for this purpose, inspection and authorization shall be required in writing (Hot Work Permit) before any such operation commences. The permit shall be issued by an experienced Fire Safety Supervisor, or his/her appointee, who shall have inspected the work area and confirmed that all necessary precautions have been taken to prevent a fire.

#### **ROOF WORK**

No one is permitted to access the roof without the pre-approval of a Senior Manager.

All roof-top workers shall follow fall protection requirements. The Company must approve all lifting apparatuses used to transport materials and equipment on the roof. The Contractors shall supply lifting apparatus', preferably fixed to the ground, which are able to transport the material to a proper distance away from the roof curb.

Smoking on the roof is strictly prohibited.

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Subsidiary of Federal Signal Corporation

## Contractor Site Orientation Acknowledgement

A brief escorted tour or discussion conducted by JJE Representatives to inform the contractor to become **familiar** with the **worksite** and any areas where special caution is required. It also affords the contractor the opportunity to ask questions about the worksite and offer information that might assist JJE in providing for their health and safety needs. The tour should address the following elements:

- ✓ Contractor Responsibilities
- ✓ Violence & Harassment
- ✓ Exit locations
- ✓ Emergency evacuation notification & muster point
- ✓ Fire extinguisher locations
- ✓ Hazard Reporting
- ✓ Occupational Injury/Illness Reporting, Incident & Near Miss Reporting
- ✓ First aid supplies & identification of first aiders
- ✓ Washroom facilities
- ✓ Eyewash stations
- ✓ Identification of areas requiring personal protective equipment
- ✓ Restricted areas
- ✓ Designated smoking area
- ✓ SDS Online
- ✓ Housekeeping
- ✓ Scope of Work

Contractor Company Name: \_\_\_\_\_

Contract Worker's Name: \_\_\_\_\_

Date: \_\_\_\_\_

JJE Representative: \_\_\_\_\_

I hereby acknowledge that I have participated in a site orientation of the JJE facility and have been made aware of all of the elements as listed.

Contractor Signature: \_\_\_\_\_

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## Policy & Procedure: P204

### Subject: Visitors

#### PURPOSE

Monitoring visitor activity helps maintain safety standards, protects against theft, ensures security of equipment, protects confidential information, safeguards employee welfare, and avoids potential distractions and disturbances. Additionally, visitor monitoring is a key element of the “Company’s” (FST Canada Inc.) **Emergency Response Plan**.

#### SCOPE

This policy is applicable to all employees and visitors of the Company.

#### POLICY

Whenever possible, the Company Representatives should notify Reception/Office Administrator in advance of the arrival of an anticipated visitor. Unexpected visitors will be asked whether the employee is expecting them or whether it is an unplanned visit. In accordance with our Workplace Violence Prevention & Reporting Policy, caution should be used with any unexpected visitor. The Receptionist/Office Administrator will contact the employee with whom the visitor is requesting a meeting to confirm whether or not they are willing to meet with the Visitor.

If they are willing to meet, the employee will meet their guest at reception. If they are not willing to meet with the visitor due to scheduling, Reception/Office Administrator will notify the Visitor they must pre-schedule the meeting with the intended Company Representative in advance of arrival.

**Visitors** must report to the front reception desk upon arrival and will be requested to read the Visitor Responsibilities Section of the **Internal Responsibility System**. Once complete, the Visitor will acknowledge that they understand the Company’s expectations by signing in the **Visitor’s Log**. Visitors must visibly wear a Visitor’s Badge beyond the reception area and for the duration of the visit.

The Company representatives will escort their visitor to their meeting destination ensuring proper PPE is worn in designated areas. The Company representative must not leave their visitor unattended and will advise their visitor of specific policies that must be followed, direct them in the reporting of hazards and injuries/illnesses, and guide them through Emergency Response Procedures as required. The Company representatives are responsible for the conduct and safety of their visitors while on the Company premises.

**Employees** should notify their supervisor immediately if they observe an unfamiliar individual on the Company premises who is not wearing a Visitors badge, unauthorized entry of private offices or restricted areas and anyone not following company policies or procedures.

Upon leaving the Company premises, visitors must report to Reception/Office Administrator and sign out in the Visitor’s Log.

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## **Policy & Procedure: P205**

### **Subject: Hazardous Materials**

#### **PURPOSE**

To ensure all employees receive education and training regarding the safe storage, handling, use and disposal of hazardous materials in the workplace.

#### **SCOPE**

This policy is applicable to all employees of the “Company” (FST Canada Inc.).

#### **POLICY**

Employers are responsible to ensure that hazardous materials in the workplace are properly labeled, Safety Data Sheets (SDS) are current and made available to employees and that employees receive adequate training regarding hazardous materials.

All Company employees must be provided hazardous material training and complete a knowledge assessment within their first week of employment. The following topics are covered in the training:

- Rights of Workers
- Duties and Responsibilities of Employers, Workers and Supervisors
- What are hazardous materials
- How hazardous materials enter the body
- Warning symbols and classifications
- Supplier labels
- Workplace labels
- Safety Data Sheets (SDS)
- Hazard Controls
- Prevention

Employees must receive task specific training from their supervisor prior to working with or around hazardous materials. Upon successful completion of hazardous material training, a completed knowledge assessment is provided to Human Resources for training record purposes. Hazardous material refresher training will be provided every 3 years or as applicable.

Management must assign the responsibility of maintaining SDS sheets to a Company employee(s) who will keep the SDS binder up to date with revised or new forms.

When a new product is introduced to the workplace, the following procedure must be followed:

1. Using the SDS sheet specific to the chemical, provide workers with task specific training prior to allowing workers access to the chemical
2. Identify workplace specific controls to minimize exposure to the chemical including use, storage, handling, access, PPE, etc.
3. Provide a copy of the SDS sheet to the Company employee responsible for maintaining the SDS binder

P205 – Hazardous Materials	H&S Policies & Procedures	Review Date: July 2018	Revision Date: November 2018
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## Policy & Procedure: P206

### Subject: Workplace Incident Reporting and Investigation

#### PURPOSE

This policy and procedure outline the mandatory steps required for the reporting and investigation of incidents and near misses in the workplace. The “Company” (FST Canada Inc.) is committed to the safety of its employees and this policy and procedure is designed to provide the correct investigatory procedures in the event of a workplace incident/accident/near-miss and to remedy and to prevent reoccurrences.

#### SCOPE

This policy is applicable to all employees of the Company, its contractors, suppliers, customers and visitors.

#### POLICY

It is the policy of the Company that all incidents, injuries or occupational illnesses in the workplace, whether involving an employee, visitor or customer be investigated by the employer. The creation of complete documentation, proper reports and investigations of workplace incidents/ accidents will increase the Company’s overall readiness to identify and resolve workplace safety issues and reduce workplace injuries.

Where able and appropriate, all incidents will be resolved with corrective action and communication with the goal of preventing similar occurrences in the workplace.

The employer will ensure there is an immediate investigation of:

- Fatalities
- Critical Injuries
- Hazardous occurrences and “close calls/near miss”
- Lost Time Injuries
- Occupational Illnesses
- Property/Merchandise Damages
- Fires
- Environmental Releases

All Managers, Supervisors, Human Resources, JHSC and H&S Reps will be designated as an “Investigator” and the Company will ensure these individuals are trained in conducting investigations and reporting of all workplace incidents, accidents or near misses.

#### DEFINITIONS

**The “Company”** – FST Canada Inc., operating as various business entities.

**OH&S** – Occupational Health & Safety. The governing body of legislation pertaining to the health, safety and welfare of people while at work

**Investigator** – the designated person who has been training in investigation and reporting, investigates the details of an incident/accident to establish a series of events that should have taken place and compares it to what actually happened to identify areas such as workplace policies or procedures, or hazard control measures that need improvement

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**Near Miss** – an incident in which no property was damaged, and no personal injury was sustained, but where, given a slight shift in time or position, damage or injury easily could have occurred

**Work related injury** – an injury or illness caused, contributed or significantly aggravated by events or exposure in the work environment. Work related injuries occur on the job and as a direct result of the tasks allotted to the specific job. The following are the different classifications of injuries:

- **First Aid** - immediate care or treatment given to an ill or injured person before at the workplace by an employee of the Company who has been certified in providing first aid. First Aid includes but is not limited to:
  - cleaning minor cuts, scrapes, or scratches
  - treating a minor burn
  - applying bandages and/or dressings
  - applying a cold compress, cold pack, or ice bag
  - applying a splint
  - changing a bandage or a dressing after a follow-up observation visit.
  
- **Medical Aid** – medical treatment by a health care professional of a workplace illness or injury. Health care includes:
  - services requiring the professional skills of a health care practitioner (e.g., doctor, nurse, chiropractor, or physiotherapist)
  - services provided at hospitals and health facilities
  - requirement for prescription drugs
  
- **Fatal/ Critical Injury** – As per the *Occupational Health and Safety Act (OH&S) Regulation 834* “Critically Injured” means an injury of a serious nature that,
  - places life in jeopardy
  - produces unconsciousness
  - results in substantial loss of blood
  - involves the fracture of a leg, arm, wrist, hand, ankle, foot, more than one finger or more than one toe but not a single finger or single toe
  - involves the amputation of a leg, arm, hand, foot, more than one finger or more than one toe but not a single finger or single toe
  - consists of burns to a major portion of the body, or
  - causes the loss of sight in an eye
  
- **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.
  
- **Lost Time** – the requirement of an employee to be away from work beyond the date of the workplace injury

## ROLES AND RESPONSIBILITIES

The following responsibilities apply:

### Employer will:

- Ensure there is an immediate investigation of all incidents including injuries, illnesses, property damage, near misses, and motor vehicle accidents
- Assist in the investigation as required
- Review recommendations for corrective actions
- Ensure that all recommendations are responded to and ensure that recommendations are implemented where appropriate or provide alternative recommendation or explanation

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- Monitor and analyze incident data for the purposes of measuring TRIR rates, and identifying safety trends

**Manager/Supervisors will:**

- Ensure that first aid is provided. If health care is necessary, provide transportation for worker to a medical facility.
- Provide employee with appropriate forms
- If the injury is critical or a fatality has occurred, call 911 immediately and preserve the scene until further notice
- Participate in the investigation using the procedure contained in this standard
- Implement/schedule any corrective actions that are determined to eliminate a recurrence
- Follow up on corrective actions
- Communicate details of the incident and any corrective actions taken to all applicable employees
- Monitor situation to ensure corrective actions have achieved desired result

**Workers will:**

- Call for emergency help if required
- Promptly receive first aid treatment if an injury is sustained
- Report all incidents, injuries or near misses as soon as reasonably possible to their Supervisor/Manager
- If the Supervisor/Manager is not present, report to a Senior Manager, JHSC, H&S Rep or to the Human Resources Department
- Participate in the investigation if asked to provide their witness account about factual actions that were seen or heard or done
- Participate in the completion of the Workplace Incident Reporting and Investigation form if they were the injured worker, witness or employee reporting a near miss

**Investigators will:**

- Investigate the report of a workplace incident, injury or near miss immediately
- Complete the Workplace Incident Reporting and Investigation form and submit to Human Resources

**Joint Health and Safety Committee (JHSC)/Health and Safety Members will:**

- Assist in workplace investigations as required
- Make recommendations to remove hazards that have been identified by the investigation process

**Human Resources will:**

- Provide the necessary forms to the investigator(s)
- Review all investigations for completion and thoroughness
- Review all recommendations for corrective actions
- Submit and ensure all required reports are submitted to the Provincial or territorial governing body as per the applicable regulation
- Document and monitor incident details for purposes of analysis and safety trending

**Visitors & General Public will:**

- Notify their Company Representative of an incident/accident. The Company Representative accompanying their Visitor will notify a JHSC, Human Resources or Branch Manager

**PROCEDURE**

**Critical Injury or Fatality**

In the event a person including a worker is critically injured or killed at the workplace, the employer must notify the Ministry of Labor or governing body, by telephone immediately, and in writing within 48 hours of the incident occurring. The employer or their designate will immediately notify the following:

- 911 to obtain medical and police

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- Government Agency:
  - The Ministry of Labour (MOL)
  - The Ministry of Environment (MOE)
  - Human Resources Development Canada (HRDC)
  - Workplace Safety and Insurance Board (WSIB/WCB)
- The General Manager
- The JHSC or HSR

**Managing the Scene:** Where a person is killed or critically injured in the workplace, the Supervisor/Manager will secure the scene of accident and obtain medical attention for the injured person. No person shall interfere with, disturb, destroy, alter, or carry away any wreckage, article, or thing at the scene of or connected with the occurrence until permission has been given by a Ministry of Labour or Workplace Safety and Insurance Board, except for the purpose of:

- Saving a life or relieving human suffering
- Maintaining an essential public utility service or public transportation system
- Preventing unnecessary damage to equipment or other property

**Critical Injury or Fatality Investigation:** Where possible, the Company will establish an investigation team to investigate the occurrence. This team may include the following people:

- Human Resources
- Manager
- Supervisor
- At least one designated worker representative from the Joint Health & Safety Committee and or the Health & Safety Representative

The investigation team will investigate the site of the critical injury or fatality (without disturbing, destroying, altering, or carrying away any evidence), if possible, within 24 hours of the occurrence. The investigation team will interview witnesses; interview co-workers and supervisory personnel as required, review applicable policies and procedures.

In the case of a critical injury, the scene must not be disturbed until the governing agency has arrived and an investigation of the critical injury has been completed. Only the governing agency can release the scene after a critical injury has occurred.

**Critical Injury or Fatality Report:** The investigation team will complete the Injury or Illness Investigation Report. This report is to be signed by all persons participating on the investigation team and within 48 hours of the occurrence. It is to be sent to the Joint Health and Safety Committee or Health & Safety Representative, and a **Notice of Accident with Critical Injury Letter** is to be sent to a Director of the Ministry of Labour or the Workplace Safety Governing Authority, to will provide details of the circumstances of the occurrence and any information as prescribed by the legislation.

### General

**Reporting incident, injury, illness or Motor Vehicle Accident:** All employees must follow the Workplace Incident Reporting and Investigation Policy and are to report immediately all injuries, incidents, near misses or Motor Vehicle accidents to their Supervisor/Manager immediately after any incident has occurred.

Contractors and Visitors must notify their Company Representative who will notify a Joint Health and Safety Committee (JHSC) member or Branch Health and Safety Representative, Human Resources or Branch Manager.

The Supervisor/Manager, along with injured worker and First Aid Rep, will complete the **Workplace Incident Reporting and Investigation form (Smartsheet)**. Completed forms are to be forwarded to Human Resources.

**Managing the Scene:** Where a worker suffers a work-related injury or illness, the Supervisor/Manager will ensure the necessary treatment is provided as soon as possible.

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Immediate steps may include:

- Calling for emergency help (e.g., fire department, ambulance)
- Providing first aid/medical aid
- Ensure worker is provided with transportation to the nearest medical care facility, if required.
- Preventing further injury or damage; taking care of the needs of the injured worker; in the case of an incident involving violence, the worker will have to be placed in a safe location as appropriate

The Supervisor/Manager shall take immediate action and/or implement a temporary control measure to ensure no other worker is injured from the cause of initial accident.

This may include:

- Informing other workers of the incident or occurrence and how it is being controlled; and
- Securing or evacuating the site of the incident or occurrence.
- Securing the incident scene until the investigation at the scene is finished
- Reassuring other workers
- Identifying potential information sources

## **Investigation**

**Incident/Injury Investigation:** All investigations are to be completed by either a designated Investigator (Manager, Supervisor, JHSC or HSR or Human Resources). All work-related injuries and illness investigations will commence immediately and be completed within 24-48 hours.

Investigator(s) are to undertake the following the steps as part of the investigation process:

### **Step 1: Gather Evidence**

When gathering evidence:

- Gather data that gives a complete picture of what happened from the beginning of the incident inclusive of what contributed to the final event
- Ensure that the evidence is factual about actions that were seen, heard or done

Interviews:

- Conduct interviews with the involved worker(s) and identify witnesses asking for their recollection of what they saw before, during and after the incident
- A member of the JHSC and management should interview the eyewitnesses separately
- The interview should occur as soon as possible so that the memories are fresh
- The interviews should take place in a private area, but where it is necessary to visit the scene (to demonstrate what a witness saw); this is to be done discreetly
- Witness statements are to be recorded and attached to a Workplace Incident Reporting and Investigation Form.

Assessment of the Scene:

To gather evidence, look for clues from the scene of the incident, for example:

- Take pictures
- Note environmental conditions, housekeeping, lighting, noise, signs, and workspace
- Make sketches
- Take measurements
- If machinery or tools are involved, record their type and location
- List any personal protective equipment or lack thereof involved in the incident/accident
- Collect foreign objects or broken pieces of equipment
- Take samples of substances/fluids
- Check procedures

### Confidentiality

The investigator must remind all individuals involved in the investigation of their confidentiality obligation and protections.

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All documentation and reports regarding the workplace incident/accident will be securely maintained by the investigator(s) throughout the process. All completed investigation reports and supporting documentation will be retained in the Human Resources office unless legally requested or administrative proceedings arise out of the workplace incident/accident.

## **Step 2: Reporting**

### Identifying Contributing Factors:

Review the possibility of contributing factors that may have had impact, e.g., people, equipment, material, environment, process. This can be found on Section 2 of the **Workplace Incident Reporting and Investigation form (SMARTSHEET)**.

Put all facts gathered in the order they occurred. Make sure that there is enough evidence and no gaps. Analyze the findings to determine the immediate and root causes of the injury/incident. Incident Analysis Report is used to record findings.

**Note:** Section 1 of the Workplace Incident Reporting Form (**SMARTSHEET**) must be submitted to Human Resources within 24 hours of the incident report date. The remainder of the report (Section 2) can be submitted to Human Resources within 72 hours of the incident report date.

## **Step 3: Risk Analysis and Corrective Actions**

In order to take corrective actions, a risk assessment is required. This risk assessment can be found in Section 2 of the **Workplace Incident Reporting and Investigation form (SMARTSHEET)**.

Once the risk analysis is completed, determine the corrective actions to be taken that will improve health and safety in the workplace and will reduce the likelihood of the same or similar incidents occurring.

## **Step 4: Follow Up on Corrective Action**

The Supervisor/Manager should follow up on the corrective actions to determine whether they were implemented and, if so, whether they were effective. The JHSC or Health & Safety Reps should also review the corrective actions to ensure they have been implemented and are effective.

## **Reporting Obligations**

**Fatality or Critical Injury:** *In the event of a Fatality or Critical Injury the Provincial or territorial governing body is to be notified **immediately** after emergency services have been called.* This phone number will be listed in the branch specific **Emergency Response Plan (ERP)** and posted to each Health and Safety Board.

When reporting a Fatality or Critical Injury, the written report shall include:

- The name and address of the employer
- The nature and the circumstances of the occurrence and the bodily injury sustained
- A description of the machinery or equipment involved
- The time and place of the occurrence
- The name and address of the person who was killed or critically injured
- The names and addresses of all witnesses to the occurrence
- The name and address of the physician or surgeon, if any, by whom the person was or is being attended for the injury

**Workers Compensation Board:** The employer has a reporting obligation to the applicable Workers Compensation Board when they become aware that an employee requires health care due to a work-related accident and/or:

- Is absent from regular work
- Earns less than regular pay for regular work (e.g., part-time hours)
- Requires modified work at less than regular pay
- Requires modified work at regular pay for more than seven **calendar** days following the date of accident

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When deciding whether to report an accident where a worker requires modified work at regular pay for more than seven calendar days, employers should consider that,

- Shift workers, or those on irregular work patterns, may not be scheduled to work on the eighth calendar day. In these cases, the employer must report the accident if the worker requires modified work on the first shift that follows the eighth calendar day.
- The seven calendar day period is not reset for workers that initially require modified work for less than seven calendar days, return to regular work for a brief period, and then require further modified work. In these cases, the requirement to report is based on whether the worker requires modified work after the initial seven calendar days following the date of accident.
- If a worker initially returns to regular work, but then requires modified work, the employer must report the accident if the worker requires modified work for more than seven calendar days from the date that the modified work began.

Employers are **not** required to report a work-related accident if the worker:

- Receives only first aid
- Receives first aid and requires modified work at regular pay for seven calendar days or less, following the date of accident
- Does not receive first aid but requires modified work at regular pay for seven calendar days or less, following the date of accident.

## COMMUNICATION

This procedure will be posted on the Health and Safety Bulletin Board at each branch location and located in the H&S Policy Manual.

Any of the following method(s) may be used to communicate this policy:

- Company email
- Company memo
- On-line posting
- Posting of policies and procedures
- Training
- Meetings and Safety talks

## TRAINING

The Company will ensure that all designated Managers, Supervisors, and all JHSC members/HSR are trained and educated on the reporting and investigation procedures outlined in this policy and that they are clear about their roles and responsibilities.

## EVALUATION

The requirements of this procedure will receive an annual formal review by the JHSC or Health & Safety Representatives. Gaps will be identified and corrected as necessary. An analysis of incident reports will be reviewed annually by HR to identify Health and Safety trends.

## EXHIBITS/FORMS

Smartsheet - Workplace Incident Reporting and Investigation form  
Smartsheet Dashboard – Health & Safety Incident/Accident Branch Summary  
Notice of Accident with Critical Injury letter

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## Policy & Procedure: P207

### Subject: Hazard Reporting

#### PURPOSE

The purpose of the Hazard Reporting Policy and Procedure is to outline steps to follow in order to report potential or actual hazardous conditions in the workplace and to ensure that our work environment and all affected personnel are protected from exposure to any hazardous conditions.

This procedure does not replace the reporting and documentation requirements for workplace inspections, accidents or injuries, critical injuries, or work refusals.

#### SCOPE

This policy is applicable to all employees of the “Company” (FST Canada Inc.), Contractors and Visitors.

#### POLICY

The Company is committed to the protection of the health, safety, and wellbeing of all employee and visitors of the Company. The Company will strive to promote a strong health and safety culture in the workplace and will facilitate the awareness of risk and prevention of injury and illness. It is the policy of the Company that all hazards identified while working as an employee of the Company or while on the Company premises must be reported immediately. Based on the severity, appropriate immediate corrective action will be taken to control the hazard ensuring the safety and security of all. Once the hazard has been controlled, a Hazard Report Form will be completed.

#### DEFINITIONS

**The “Company”** - FST Canada Inc., operating as various business entities.

**Hazard** – A hazard is anything that can cause injury or illness to people, or damage to property. A hazard may occur from what people do, or may occur because of their working conditions

**Hazardous Act** – A hazardous act is any behavior that could lead to an accident/incident. Examples of hazardous acts: using equipment in an unsafe or careless manner or not using personal protective equipment as required

**Hazardous Condition** – A hazardous condition is any circumstance that could allow an accident to occur. Examples of hazardous conditions: inadequate, improper or lack of guarding, slippery work surfaces, electrical grounding requirements not observed, containers that are not labeled

**Major hazards (high rated)** – those with a high-risk potential. They are serious or significant hazards, and should receive high priority for immediate controls or elimination

**Moderate hazards (medium rated)** – those with medium risk potential and require controls as soon as possible

**Minor hazards** – those with low-risk potential and require controls after any higher priority hazards have been addressed

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## ROLES AND RESPONSIBILITIES

The following responsibilities apply:

### Employer will:

- Develop, implement and monitor a prescribed program for the prevention of hazards in the workplace
- Be responsible for ensuring that the Internal Responsibility System (IRS) is established, promoted, and that it functions successfully
- Ensure all incidents are adequately investigated in a timely manner and recorded
- Monitor progress of corrective and/or preventative actions
- Evaluate all recommendations stemming from the hazard report or incident investigation and initiate corrective or preventive actions as required

### Managers will:

- Ensure action is taken to address the hazard identified
- Initial and date the Hazard Report Form

### Supervisors will:

- Ensure workers are fully aware of the hazards that may be encountered on the job or in the workplace
- Ensuring that they work safely
- Respond to the worker's concern by the next shift
- Ensure that the form details the action or non-action which will be taken
- Provide a copy of the completed Hazard Report Form to management

### Employees will:

- Workers in the workplace who see a health and safety problem or contravention of the safety legislation, hazard or potential hazard in the workplace must report the hazard verbally to the site supervisor
- Provide recommendations to the supervisor on how to eliminate or control the hazard  
If the supervisor does not respond to the employee's concern, the employee is to inform next level management or Human Resources

### Joint Health and Safety Committee (JHSC)/Health and Safety Members will:

- Contribute to workplace health and safety because of their involvement with health and safety issues, and by assessing the effectiveness of the IRS
- Assist with the completion of Hazard Reports
- Assist when asked, to participate in identifying and making recommendations for corrective actions to the hazard reported

### Human Resources will:

- Review and update the Hazard Reporting Policy and procedures with the JHSC as required.

### Visitors & General Public will:

- Report all hazards to their Company contact
- Work safely and following safe work practices

## REPORTING PROCEDURE

Upon the discovery of a hazard, any employee of the Company must proceed in the following manner:

1. Every employee is responsible for the identification, immediate reporting and where possible elimination and control of hazards in the workplace
2. If the hazard is minor and can be corrected in a healthy and safe manner by the employee, they should proceed and then inform their supervisor of the correction. If they are unable to take corrective action

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themselves, they should act quickly to tell a manager or supervisor who can take action to prevent an accident or harm.

3. The completed form should be submitted to the Manager/Supervisor by the end of the day or shift on the day the hazard was identified
  4. For those hazards they believe are medium to high risk, the *Hazard Report Form* is to be completed and brought to the attention of their supervisor immediately.
  5. Upon completion of the ***Hazard Report Form*** by the employee, the supervisor will take every precaution reasonable in the circumstances for the protection of the worker. The immediate Supervisor is to:
    - Assess the hazard and initiate an action under their own control or through another appropriate individual, with the intent to eliminate or control the hazard
    - High ratings are hazards that could result in death, permanent disability, loss of body part or extensive loss of structure, equipment or material.  
Medium ratings are hazards where serious injury or illness could result in temporary disability, property damage that is disruptive,  
Low ratings are hazards that may result in minor injury or illness that is non-disabling
    - More immediate action must be taken when the risk is higher and controls available are less.
    - Indicate the action taken in the *Hazard Report Form*
    - Complete the second step of the form by identifying their response to the worker of the action taken to eliminate or control the hazard and provide feedback on their action to the employee having reported the hazard within a reasonable time frame
  6. At any stage, the employee reporting the hazard may enlist the support of their Joint Health & Safety Committee or Health & Safety Representative, whose role it is to facilitate discussions between the employee and supervisory level in remedying the hazard. At all times, the JH&SC/H&S Rep and employee must first allow the Supervisor the opportunity to address the hazard.
  7. To ensure communication and follow up, the supervisor will send copies of the completed form to the Joint Health & Safety Committee Co-Chairs or Health & Safety Representative as well as the next level of management.
- **Note:** All incidents of violence, harassment and sexual harassment will be documented, using the Workplace Violence, Harassment, and Sexual Harassment Incident Report Form (F208.1).

## COMMUNICATION

- This procedure will be fully communicated to every employee at the Company
- The communication session will be conducted during department meetings or toolbox talks

Any of the following method(s) may be used to communicate this policy:

- Company email
- Company memo
- Online Company Intranet
- Posting of policies and procedures
- Training
- Meetings and Safety talks

## TRAINING

The Company will ensure that all employees are trained and educated on Hazard Reporting and are clear about their roles and responsibilities as well as this policy and its procedures.

## EVALUATION

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This procedure will be evaluated annually in consultation with the JHSC. A review of the submitted Hazard Reporting Form (F207.1) will form the basis of the evaluation.

**EXHIBITS/FORMS – *Smartsheet Hazard Report Form***

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## Policy & Procedure: P208

### Subject: Workplace Violence, Harassment and Sexual Harassment Policy and Prevention Program

#### PURPOSE

To provide employees with a safe and healthy work environment that is free of violence and harassment and to ensure all employees receive equal respect and treatment, regardless of personal differences and to ensure a reporting process for workplace violence and harassment is made available and known by all employees.

#### SCOPE

This policy is applicable to all employees of the “Company” (FST Canada Inc.), its contractors, suppliers, customers and visitors.

#### POLICY

The Company is committed to building and preserving, for its employees, a safe work environment based on mutual respect which is free from violence, threats of violence, discrimination, harassment of any kind, or intimidation. Acts of violence or harassment against or by any employee will not be condoned or tolerated by the company and this policy outlines the Company’s violence and harassment program, including how incidents of violence and harassment will be handled and investigated. It is the policy of the Company to communicate this policy to all employees, provide training for employees regarding this policy and its procedures.

The Company will encourage employees to report all incidents regardless of who the alleged offender(s) might be and can do so without any fear of reprisal and will ensure that there are no negative consequences for reports made in good faith.

Employees who do not follow the requirements of this policy will be subject to disciplinary action up to and including termination. The degree of discipline will be proportional to the nature and seriousness of the incident.

Where a person employed by the Company has a history of violent behavior and the Company has knowledge of this history, the Company will provide personal information to any employee who is expected to encounter this person with a history of violent behavior and the employee is at risk of physical injury. The Company will only disclose to other employees as much information as necessary to protect other employees from physical injury.

All other persons: contractors, suppliers, customers and visitors to the Company must also comply with legislative requirements and the requirements of this policy. Individuals failing to abide by this policy will be promptly removed from the properties(s).

The Company will review the Workplace Violence, Harassment and Sexual Harassment Policy and Prevention Program as often as necessary but at least annually. As part of this review, the Company will also conduct an annual workplace violence risk assessment.

This policy has been developed in consultation with the Joint Health and Safety Committee (JHSC) and will be reviewed on an annual basis.

#### DEFINITIONS

The “Company” - FST Canada Inc., operating as various business entities.

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**Complainant** – The person who has made a complaint about another individual whom they believe committed an act of violence against them.

**Harasser/Accused** – The person whom another individual has accused of committing an act of violence, an act of harassment or sexual harassment.

**Workplace Violence** – Any action, conduct, threat or gesture of a person towards an employee in their workplace that can reasonably be expected to cause harm, injury or illness to that employee.

**Prohibited workplace or threats of workplace violence** may include, but is not limited to, the following:

- Aggressive physical contact with another individual (e.g., hitting, shoving, pushing, kicking, sexual assault, throwing an object at or near another employee, kicking an object the employee is standing on such as a ladder, or trying to run down an employee using a vehicle or equipment such as a forklift).
- Threatening to harm an individual or their family, friends, associates or their property
- Intentional destruction or threat of destruction of property owned or operated by the Company
- Possession or use of any firearm, weapon, or any other dangerous device for the purpose of intimidation or injury of another person
- All threats or acts of violence occurring on Company property, regardless of the relationship between the Company and the parties involved in the incident
- All threats or acts of violence not occurring on Company property but involving someone who is acting in the capacity of a representative of the Company
- All threats or acts of violence not occurring on Company property, involving an employee of the Company, whereby the threats or acts of violence affect the interests of the Company

**Domestic Violence** – A person who has a personal relationship with an employee of the Company—such as a spouse or former spouse, current or former intimate partner or a family member—may physically harm, or attempt or threaten to physically harm, that employee at work. In these situations, domestic violence is considered workplace violence.

**Workplace Harassment:**

- (a) *Engaging in a course of vexatious comments or conduct against an employee in a workplace that is known or ought reasonably to be known to be unwelcome; or*
- (b) *Workplace sexual harassment.*

**Harassment toward another person can be related to one or more of the following:**

- age, size, weight, physical appearance
- nationality, ancestry or place of origin
- gender, sexual orientation
- marital status, family status, economic status
- religious or political beliefs, association or activity
- mental or physical disability
- alcohol or drug dependence

**Acts of Harassment** may include, but are not limited to, the following:

- Making harassing or threatening telephone calls, letters or other forms of written and electronic communication
- Intimidating or attempting to coerce an employee to do wrongful acts
- Harassing surveillance or “stalking” meaning the willful, malicious and repeated following of another person
- Making a remark suggesting or implying an act to injure persons or property

Reasonable action taken by the Company, Supervisor or Manager relating to the management and direction of employees or the workplace is not workplace harassment.

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**“Bullying”** behaviour may involve:

- Abuse of power, authority or control by a manager or person of authority
- Repeated humiliation or intimidation by any person that adversely affects an employee’s psychological or physical well-being
- A single instance so serious that it has a lasting, harmful effect on an employee

**“Discrimination”** behavior may involve:

- Differential treatment of an individual or group of individuals which is based, in whole or in part, on one or more than one of the prohibited grounds of discrimination, and which thus has an adverse impact on the individual or group of individuals.

**Workplace Sexual Harassment:**

- (a) *Engaging in a course of vexatious comment or conduct against an employee in a workplace because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome, or*
- (b) *Making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the employee and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.*

**Sexual harassment** includes, but is not limited to:

- Unwanted touching, leering, sexual assault
- Inquires or comments pertaining to an individual’s love life
- Telephone calls or e-mails with sexual overtones, gender bias jokes or insults
- Displaying of pornographic or sexually offensive material
- Repeated unwanted social invitations
- Abuse of power, authority or control by a Manager/Supervisor including sexual solicitation or advances made by a person in a position to confer, grant, or deny a benefit or advancement; placing a condition of a sexual nature on an employee’s continued employment or opportunity for training or promotion; a reprisal or a threat of reprisal for the rejection of a sexual solicitation or advance

**Workplace violence or harassment can occur:**

- At the workplace
- At employment-related social functions
- In the course of work assignments outside the workplace
- During work-related travel
- Over the telephone if the conversation is work-related or
- Elsewhere, if an incident takes place when an employee is there because of work-related responsibilities or a work-related relationship.

***Comments exhibiting bullying, harassment or sexual harassment, against another employee, by use of social media, will be considered the same as making those statements in the workplace and employees will be held accountable for their actions.***

**ROLES AND RESPONSIBILITIES**

The following responsibilities apply:

**Employer will:**

- Hold management accountable for responding to and resolving complaints of violence, harassment and sexual harassment in a fair, objective and expeditious manner.
- Ensure compliance by all who have a relationship with the organization, such as contractors, suppliers, customers and visitors

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- Consult with the JHSC or Health and Safety Committees, and conduct annual risk assessments
- Ensure strict confidence is adhered to by all parties involved
- Take necessary corrective actions
- Provide response measures

**Human Resources will:**

- Prepare a written policy with respect to Workplace Violence, Harassment and Sexual Harassment and develop and maintain a program to implement the policy and review the policy as often as is necessary but at least annually.
- Ensure the Workplace Violence, Harassment and Sexual Harassment Policy & Prevention Program is posted in a conspicuous place.
- Establish and deliver training and education for all employees
- Develop a reporting process for incidents of workplace violence, harassment or sexual harassment
- Participate in the investigation of all reports of workplace violence, harassment or sexual harassment in a prompt, objective and sensitive way
- Take necessary corrective actions
- Provide response measures
- Track and analyze incidents for trending and prevention initiatives

**Manager/Supervisors will:**

- Do everything reasonable to stop any incidents of workplace violence, harassment or sexual harassment that is suspected or are aware of in the workplace, whether or not a complaint is made
- Work with Human Resources to take corrective action with anyone under their direction who initiates a violent act or harasses another person and implement disciplinary action when necessary
- Provide continued training and communication of the Workplace Violence, Harassment, Sexual Harassment Policy & Prevention Program

**Employees will:**

- Assist in eliminating and preventing violence, harassment or sexual harassment in the workplace by working together in a professional and respectful manner
- Report all acts of violence, harassment and sexual harassment, which threaten, or perceive to threaten, a healthy and safe work environment to their Supervisor, Manager or Human Resources.
- Cooperate in the investigation of a violence or harassment complaint
- Maintain confidentiality - anyone who gives evidence or information in an investigation, or is involved in the process must keep this information confidential
- Report immediately any incident or occurrence they have witnessed of a co-employee who has been subjected to any acts of violence or harassment in the workplace

**Joint Health and Safety Committee (JHSC)/Health and Safety Members will:**

- Be consulted about the development, establishment and implementation of Workplace Violence, Harassment and Sexual Harassment Policy & Prevention Program
- Make recommendations to the employer for developing, establishing and providing training in prevention measures and procedures
- Take part in the review of the Workplace Violence, Harassment and Sexual Harassment Prevention Program at least once a year

**Visitors & General Public will:**

- Treat all employees with respect and abide by this policy while conducting business at the Company's workplace.

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## PROCEDURE

### How to Report Workplace Violence, Harassment or Sexual Harassment:

Any employee who believes they have been subject to an incidence of violence, harassment or sexual harassment should, in all confidence and without fear of reprisal, personally report the incident or occurrence as soon as possible to their immediate supervisor, manager, HR, or Federal Signal.

Federal Signal Corporation maintains a confidential toll-free hotline that allows Company employees, shareholders and interested third parties to report possible violations of laws, regulations, or Company policies. Reports may be made on an anonymous basis. The hotline is staffed 24 hours a day, every day.

Possible violations may also be reported online. Employees are encouraged first to report any issues to their local Human Resources Department. Matters reported through the Compliance Hotline are referred to Diane Bonina, the Company's General Counsel and Chief Compliance Officer, who will coordinate any investigation and resolution.

To report to Federal Signal Contact:

- Call United States or Canada: 1-866-776-7015
- On the internet visit [www.federalreports.com](http://www.federalreports.com)
- By Mail:
  - Mark your envelope "Confidential"
  - Federal Signal Corporation  
1333 Butterfield Road Suite 500  
Downers Grove Brook, IL 60515  
Attn: Diane Bonina, General Counsel and Chief Compliance Officer

Employees are encouraged to report any incidents or situations of violence, harassment or sexual harassment in a timely manner whether they have been subjected to such behavior or whether they observe, or know, of a fellow employee or group of employees who have engaged in, or been subjected to, workplace violence, harassment or sexual harassment.

If the harassed individual feels safe and unthreatened to confront the accuser without escalation, they are encouraged to do so. It is recommended that the harassed individual document any situations or discussions of harassment that have occurred.

Federal Government's Criminal Codes deal with matters such as violent acts threats and behaviors such as stalking. The police should be contacted immediately when an act of violence has occurred in the workplace or when someone in the workplace is threatened with violence. If an employee feels threatened by a co-employee, volunteer, contractor, student, vendor, visitor or client/ customer then an immediate call to "911" is required.

Employees can report incidents or complaints of violence, harassment or sexual harassment in writing using **Form 203.1 – Workplace Violence, Harassment or Sexual Harassment Incident Report Form**.

The report of the allegation(s) should include the following information:

- Name of the reporting employee, name of the Complainant, and name of the alleged harasser
- Identifying and nature of the relationship of the harasser
- Name and account of the witnesses
- Details of the incident including events leading up to, and after the violent act or incidents of harassment
- Emergency steps taken
- Signature of reporting employee and individual taking the report

The Company is committed to working with the employee every step of the way in an informed manner. The Company recognizes that this issue may be sensitive and may have an emotional impact on the individual; therefore, no time limit will be instituted for reporting an incidence of violence or harassment.

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**Who to Report Workplace Violence to:**

Employees are encouraged to report any incidents or situations of violence or harassment to their Supervisor, Manager or to Human Resources.

If the violent act is initiated by or the harasser is the Employer, Manager or Supervisor, the individual can report the violent act or harassment directly to the Human Resources Department.

Depending on the severity of the violent incident, the Supervisor/Manager or Human Resources will arrange transportation to a medical facility for medical care. The appropriate Labor Authority and/or Police will be contacted. The Supervisor will advise any employees who may be at risk.

**Who Will Investigate?**

The Manager/Supervisor and/or Human Resources will determine who will conduct the investigation into the incident or complaint of workplace violence, harassment or sexual harassment.

The investigator must not be directly involved in the incident or complaint and must not be under the direct control of the alleged offender or harasser.

The investigator should have knowledge of how to conduct an investigation that is appropriate in the circumstances.

The investigator must make reasonable efforts to interview all parties involved (including witnesses), even if they are not employees and must give the alleged offender or harasser the opportunity to respond to the specific allegations raised.

Depending on the allegations and the people involved, the investigation may be referred to an external investigator to conduct an impartial investigation.

**Timing of the Investigation:**

Investigations should be completed within 90 calendar days, unless there are extenuating circumstances (i.e. illness, complex investigation) warranting a longer investigation.

**Investigation:**

Once a complaint has been received, a thorough investigation will take place. The investigation will be appropriate to the circumstances of the complaint and all findings of the investigation will be formally documented.

- The “Investigator(s)” should review the Workplace Violence, Harassment and Sexual Harassment Policy and Prevention Program before starting the investigation process
- If the resolution of the incident is beyond the authority of a manager, supervisor or Human Resources, the General Manager is to be made aware of the incident
- In a crisis situation, the alleged offender or harasser may be immediately suspended or removed from the workplace to ensure the safety of others until the investigation is complete. The suspension will be with pay

In the event that a complainant’s concerns were not resolved at the workplace, or they feel the threat still exists then the complainant has a right to contact their Provincial or Territorial Employment Standards office with the complaint and can do so without any fear of reprisal.

**The following are the steps of the investigation process:**

1. Supervisor/Manager or Human Resources will take the complaint from reporting employee
2. Obtain a Description of the Incident/Claim
  - Listen to the employee, and ensure that they provide a full account of the incident(s)
  - Ensure that you treat the matter seriously, using a professional manner and avoid discounting their difficulties in coming forward and telling the story
  - Contact the company legal department where it appears that the situation may require legal action
  - Obtain a written, signed and dated statement from the claimant

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- Ensure that the employee is free from retaliation as a result of their coming forward
  - Ask the employee if there is a resolution that can be reached or if they wish to file a complaint with the authorities
  - Report the details by using the Workplace Violence, Harassment and Sexual Harassment Incident Report Form (F203.1)
3. Conduct an Investigation into the Incident / Claim
    - Conduct your investigation immediately after learning of the complaint
    - Ensure that the investigation remains confidential, and that all information gathered remains confidential. Information should be shared only where necessary, and with appropriate parties They must also be informed of the need to remain confidential
    - Investigate all claims seriously
    - Document all information appropriately
    - Contact the authorities where appropriate
  4. Interview the Complainant
    - Obtain a full account of the incident, and document all details provided
    - Determine any potential pattern involved, or if the incident was a singular occurrence
    - Determine if the incident was influenced by any contextual factors
    - Identify any reporting relationships, or hierarchical structures that may have influenced the incident(s)
    - Determine a timeline of events associated with the incident, and what the job duties of each party were at the time of the incident, and what their expected locations were
    - Examine the potential of a charge made under false pretenses, and any motivating factors that may be involved. Work to rule out these potential elements
    - Inform the complainant that a thorough investigation will take place
    - Obtain a written, signed and dated statement from the claimant
    - Ensure that the employee is free from retaliation as a result of their coming forward
  5. Interview the Accused
    - Obtain a written, signed and dated statement from the claimant
    - Describe the details of the accusation, and ask for clarification on any discrepancies between the two stories
    - Identify any reporting relationships, or hierarchical structures that exist between the parties
    - Determine a timeline of events associated with the incident, and what the job duties of each party were at the time of the incident, and what their expected locations were
    - Determine any potential for retaliation or reprisal, and inform the accused that this would be unacceptable
    - Document all pertinent details of the interview, including observations of behavior displayed and their account of the incident
  6. Interviewing Witnesses
    - Obtain written, dated and signed statements from any witnesses
    - Ensure that the employee is free from retaliation as a result of their coming forward
  7. Resolve the Complaint
    - Where a transfer is either requested or required, ensure that it does not create a negative impact on their employment
    - Where disciplinary action is required, determine the level of discipline based on the severity of the incident, previous action taken in similar circumstances, the employees' previous history, and the frequency
    - Review, revise and re-communicate Company policy on Workplace Violence, Harassment and Sexual Harassment

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- Place documentation of the complaint, investigation, rulings, discipline imposed, and any actions taken into confidential files and not the personnel files of the parties involved
  - Provide written findings to both the complainant(s), the alleged offender or harasser(s) of the outcome of the investigation and any remedies or disciplinary action taken as a result of findings
8. Finalize the Investigation report by reporting the details of the investigation, the parties involved, evidence gathered, authorities contacted, the summary of findings and the resolution of the complaint by using and **Form 203.2 – Workplace Violence, Harassment or Sexual Harassment Findings Report Form.**
9. Provide the completed investigation report to the General Manager.

**Results of the Investigation:**

The results of an investigation and any corrective action must be communicated in writing to the complainant and the alleged offender or harasser within 10 calendar days of the conclusion of the investigation. There is no requirement for the investigation report itself to be shared with such persons.

**Disciplinary Action:**

- Where the investigation finds evidence and a violation has been affirmed, The Company, in alignment with the Progressive Discipline Policy, will take appropriate action including disciplinary up to and including termination of employment
- Where the investigation does not find evidence to support the complaint, no action will be taken against the alleged harasser
- It is a violation of this Workplace Violence, Harassment and Sexual Harassment Prevention Policy for anyone to knowingly make a false complaint, or to provide false information about a complaint. If an investigation results in a finding that the complainant *intentionally falsely accused* another of workplace violence, the Company will take appropriate disciplinary action in alignment with the Progressive Discipline Policy

**Right to Refuse Unsafe (Dangerous) Work:**

Employees have the right to refuse work if there is (or can be reasonably interpreted to be) a threat or likelihood that he or she will be endangered by workplace violence. Upon refusing to work, the employee must follow the Work Refusal process and report the circumstance of the refusal to their manager or health and safety representative. An investigation will follow in the presence of the employee and the worker safety representative.

Where a worker receives a threat that does not cause him/her to fear for his/her personal safety, the worker should use the procedures in the workplace violence or harassment program to report the incident to his or her employer.

**Support:**

Any employee who has been harmed as a result of a violent act or incident of harassment or sexual harassment in the workplace has the right to assistance. The Company recommends that any employee who has been a victim at the workplace seeks health care assistance and/or consultation.

The Supervisor/Manager and HR Manager will review the incident and its effects and take reasonable steps to accommodate employees involved in the incident.

**Confidentiality:**

All records of violence, harassment and sexual harassment and subsequent investigations, are considered confidential and will not be disclosed to anyone except to the extent required by law. The Company will do everything it can to protect the privacy of the individuals involved and to ensure that complainants and offenders or harassers are treated fairly and respectfully.

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The investigator must remind all individuals involved in the investigation of their confidentiality obligation and protections.

All documentation and reports regarding workplace violence, harassment or sexual harassment complaint(s) will be securely maintained by the investigator(s) throughout the process. All completed investigation reports and supporting documentation will be retained in the Human Resources office unless legally requested or administrative proceedings arise out of the workplace violence, harassment or sexual harassment incident.

## **TRAINING**

The Company will ensure that all employees are trained and educated on workplace violence, and that they are clear about their roles and responsibilities, as well as this policy and its procedures. In accordance with the Canada Occupational Health and Safety Regulations, all employees shall receive the following information, instruction and training:

- The nature and extent of workplace violence and/or harassment and how employees may be exposed to it.
- The communication system established by the employer to inform employees about workplace violence and/or harassment.
- Information on what constitutes workplace violence and/or harassment and on the means of identifying the factors that contribute to these behaviors.
- The workplace violence and harassment prevention measures that have been developed; and
- The employer's procedures for reporting on risks and incidents of workplace violence, harassment and sexual harassment

## **COMMUNICATION**

A copy of this policy will be posted and made available to all employees.

Any of the following method(s) may be used to communicate this policy:

- Company email
- Company memo
- On-line posting
- Posting of policies and procedures
- Training
- Meetings and Safety talks

## **EXHIBITS/FORMS**

F208.1 – Workplace Violence, Harassment or Sexual Harassment Incident Report Form

F208.2 – Workplace Violence, Harassment or Sexual Harassment Complaint Findings Report

Workplace Violence Risk Assessment Survey

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## Policy & Procedure: P209(a)

### Subject: Psychological Harassment Prevention and Complaint Processing Policy Program (Quebec)

#### PURPOSE

To provide a psychologically safe and healthy working environment for all employees. Every employee has the right to a work environment free from harassment of any kind.

#### SCOPE

This policy is applicable to all employees of the “Company” (FST Canada Inc.), its contractors, suppliers, customers and visitors.

#### POLICY

The Company is committed to taking every reasonable action to prevent psychological harassment and put an end to any such behavior once becoming aware of it. This policy sets forth guidelines for preventing psychological harassment and the complaint process to be followed if a complaint of psychological harassment is received.

Through organizational policies and procedures, management practices, and working conditions, the Company will foster a workplace culture that prevents psychological harm and promotes psychological well-being. All parties have a responsibility to ensure the workplace is free from psychological harassment.

#### DEFINITIONS

**The “Company”** - FST Canada Inc., operating as various business entities.

**Psychological harassment** – Any vexatious behavior in the form of repeated and hostile or unwanted conduct, verbal comments, actions, or gestures, including behaviors of a sexual nature, that affects an employee’s dignity or psychological or physical integrity and that results in a harmful work environment for the employee. A single serious incident of such behavior that has a lasting harmful effect on an employee may also constitute psychological harassment.

#### ROLES AND RESPONSIBILITIES

The following responsibilities apply:

##### Employer will:

- Identify and control psychological hazards by assessing the work environment
- Engage all employees in regular dialogue about the prevention of psychological harassment and the protection of employees
- Communicate the importance of a psychologically safe and healthy working environment and encourage employees to participate in programs related to the prevention of psychological harassment
- Reinforce the importance of a healthy and safe working environment by ensuring company values align with company policies that prevent harassment in any form

##### Manager/Supervisors will:

- Participate in the development and implementation of policies, practices, and procedures that prevent, or put an end to, psychological harassment
- Positively influence employees and the organization by acting as an exemplary leader and role model, upholding the organization’s values and ethics

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- Identify psychological hazards and address them accordingly
- Engage workers to be aware of psychological health and safety hazards
- Provide necessary feedback to help the company determine the effectiveness of psychological harassment prevention policies and procedures.

**Employees will:**

- Abide by all policies, practices, and procedures that prevent or put an end to psychological harassment
- Report any witnessed or experienced incidents of psychological harassment
- Assist the organization with identifying psychological hazards
- Participate when able in workplace health and safety committees to promote psychological health and safety
- Ensure understanding and prevention of psychological harassment by taking any necessary training provided by the company

**Joint Health and Safety Committee (JHSC)/Health and Safety Members will:**

- Communicate the importance of a psychologically safe and healthy working environment and encourage employees to participate in programs related to the prevention of psychological harassment
- Positively influence employees and the organization by acting as an exemplary leader and role model, upholding the organization’s values and ethics
- Identify psychological hazards and address them accordingly

**Human Resources will:**

- Review and maintain policies related to psychological health and safety at least annually
- Conduct ongoing research such as focus groups, surveys, and audits to determine the psychological health and safety of the organization. Use the results from these evaluations to create and implement follow-up action plans that foster a positive working environment.

**Visitors & General Public will:**

- Abide by all policies, practices, and procedures that prevent or put an end to psychological harassment

**PROCEDURE**

**Identifying and Controlling Hazards**

Identifying and controlling hazards starts with an assessment of the working environment. The company will gather organizational data from a variety of sources to gain an understanding of the existing work environment. Doing so will help the company to identify gaps in existing policies, practices, and procedures and make improvements.

Factors to be considered when assessing the work environment include:

- Organizational culture, values, and ethics
- Existing company policies, practices, and procedures
- Incident reports, worker complaints, investigation findings, and risk assessments
- Relevant laws and regulations, including human rights, employment standards, and health and safety
- Psychological supports available to employees
- Communication of expectations
- Psychological job demands, workload management, and absenteeism rates
- Opportunities for growth and development
- Recognition and reward practices
- Stressors identified by employees and managers through feedback, such as surveys and participation rates
- Psychological protection from violence, bullying, and harassment; and
- Protection of physical safety

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## **Preventive and Protective Measures**

Once psychological hazards have been identified, preventive and protective measures will be implemented to protect employees. Every situation will be evaluated, as different circumstances require different measures. The company will implement the most effective measures given the nature of the hazard. If the hazard cannot be eliminated entirely, the company will implement controls that reduce associated risks.

## **Education, Awareness, and Communication**

The Company will inform employees of all psychological hazards and communicate the procedures in place for preventing such hazards. Employees should share ideas, concerns, or input for consideration and will not be penalized in any way for expressing their thoughts. The company will also ensure employees are aware of supports and resources available to them.

## **COMPLAINT PROCESSING**

For the purposes of this section, the following definitions apply:

**Complainant** – The person who has made a complaint about another individual whom they believe committed an act of psychological harassment against them.

**Respondent** – The person whom another individual has accused of committing an act of psychological harassment against.

### **Reporting**

Employees who witness or experience any form of psychologically harassing behaviour in the workplace are strongly encouraged to report the incident. All reports should be directed to the Manager of Human Resources, and include as much detail as possible, including the date of the incident, where the incident occurred, the complainant (or whoever was the object of the alleged harassment) and respondent, and the nature of harm.

### **Investigation**

Once an incident has been reported, the company will conduct an investigation to determine whether the incident constitutes psychological harassment. The investigation will aim to identify immediate and underlying causes of the incident, as well as possible corrective and preventive actions. A third party may be retained to conduct the investigation and make recommendations in certain circumstances.

The investigation will consist of:

- Informing the respondent of the complaint
- Interviewing the complainant, any person involved in the incident, and any identified witnesses
- Interviewing any other person who may have knowledge of the incidents related to the complaint or any other similar incidents
- Taking and documenting statements from all parties involved, then making a decision

The respondent will be invited to reply in writing to the complainant's allegations, and the reply will be made known to the complainant before the investigation proceeds further. Upon completion of the investigation, the Company will provide both the complainant and respondent with a written summary of the findings of the investigation and any corrective action that has been or will be taken as a result of the investigation.

If harassment in any form has occurred, appropriate disciplinary measures will be taken as soon as possible. The company will, within reason, protect the details of the incident being investigated and the identities of the complainant and the respondent.

Employees will not be demoted, dismissed, disciplined, or denied a promotion, advancement, or employment opportunities because they lodged a psychological harassment complaint when they honestly believed they were being harassed.

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## **TRAINING**

The Company will ensure that all employees are trained and educated on Psychological Harassment Prevention and are clear about their roles and responsibilities as well as this policy and its procedures.

Any of the following method(s) may be used to communicate this policy:

- Company email
- Company memo
- Posting of policies and procedures
- Training
- Meetings and Safety talks

## **CONFIDENTIALITY**

The Company will handle sensitive information confidentially and appropriately. All information related to the investigation will remain confidential unless absolutely necessary to disclose. However, the Company will communicate any potential hazards identified during the investigation to employees.

## **EVALUATION**

The Company will conduct ongoing research such as surveys to determine the psychological health and safety of the organization. Use the results from these evaluations to create and implement follow-up action plans that foster a positive working environment.

## **EXHIBITS/FORMS**

F209.1 – Psychological Harassment Report Form

F209.2 – Psychological Harassment Prevention and Complaint Processing Acknowledgment Form

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## Policy & Procedure: P210

### Subject: Working Alone

#### PURPOSE

To protect Workers in situations where there is no direct supervision and, in the event of injury, health impairment, victimization, or other adverse condition or emergency, assistance is not readily available.

#### SCOPE

This policy is applicable to all employees of the “Company” (FST Canada Inc.)

#### POLICY

The Company is committed to minimizing and, wherever possible, eliminating the risks associated with employees working alone. In the interest of the safety health and welfare of our employees, **NO PERSON shall be permitted to work alone or in isolation without authorization from their direct Supervisor.** Our practice is not to permit any Apprentices or casual/temporary employees to work unsupervised.

Employees including Regional Sales Managers, Demonstrators, Drivers and Road Technicians are required to work alone on a daily basis as a fundamental component of their employment. It is the responsibility of the Supervisor for each of these categories of Workers to establish and train Workers on an appropriate check-in procedure and ensure compliance.

For all other positions where working alone is not the norm, the Worker and their Supervisor will together have the responsibility to discuss the details of the work, develop practical safety procedures that are clearly defined and understood, and agree to all aspects prior to working alone. Ultimately, employees always maintain the right to refuse unsafe work conditions and must use their discretion when assessing the risks of working alone.

#### Working alone scenarios include:

- a) An employee who is working away from a Company location and is not accompanied by another person (RSM, Road Service Technician)
- b) An employee who is working in an isolated area at a Company location where they cannot be seen or heard by another person (yard work, wash bay)
- c) An employee who is working after hours at a Company location and is not accompanied by another person (office staff)

#### DEFINITIONS

**Buddy System** - a system to organize work so that the lone worker can always be seen or heard by at least one other **Company employee or competent person** at the workplace.

- **For example:** In the case of a pre-approved after-hours assignment involving a Mechanic working on customer equipment, where there is no other Company employee present, the “Buddy” may be the driver, operator or customer providing a written Safe Work Procedure is developed and agreed upon and signed by the mechanic and the Buddy.

**Designated contact** – a person who is not at the same workplace as the lone worker that is assigned and accepts the responsibility of carrying out a pre-determined check in procedure with the Worker. The “Designate” **does not necessarily** have to be an employee of Company but will have the Safe Work Procedures for the assignment. The Supervisor must approve of the designated contact person selected.

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- **For example:** In the case of an office employee pre-approved to work on the weekend, the “Designate” may be their spouse who they check- in with via text message when they arrive, at scheduled intervals and then upon departure.

## RESPONSIBILITIES

### Workers must:

- Work in the safest possible manner at all times
- Be trained on the Working Alone policy prior to working alone.
- Have pre-authorization from their supervisor
- Be trained and qualified to perform the tasks required
- Be knowledgeable and participate in the evaluation of the risks associated with the work and the work environment
- Follow any procedures outlined on the **Working Alone Safe Work Procedure Form**
- Search the scene for environmental and vicinity hazards
- Look for slip/trip hazards, fluid leaks from equipment
- Familiarize themselves with the location: area maps, worksite orientation, emergency response plan, nearest hospital, lighting etc.
- If relevant to the work, discuss issues with the Machine Operator
- Ensure all personal protective equipment is available and worn
- Ensure communication method is effective and is readily available
- Ensure first aid kits, and if applicable, fire extinguishers are readily available and are in good working order
- Be aware of potential violent situations that may occur and familiarize themselves with the response plans for those situations

### Supervisors must:

- Ensure the safety and security of Workers under their supervision and direction
- Identify any regulation, code or existing policy that prohibits a person from working alone
- Avoid having a lone worker whenever possible, especially for jobs with a recognized risk:
  - After hours - check with other Workers/Supervisors to determine if any other Company employees will be present in the workplace at that time
  - During regular business hours - institute the **“Buddy System”** to organize work so that the worker can always be seen or heard by at least one other **worker**
- Schedule higher risk tasks to be done during normal business hours, or when another worker capable of helping in the event of an emergency is present. Limit the time-of-day visits can be made to high-risk areas/clients
- Implement an appropriate check-in procedure to ensure regular contact is maintained with all employees and establish ways to account for people (visually or verbally) while they are working
- Establish an effective means of communication so employees can easily contact someone in case of emergency
- Where applicable, work in conjunction with the Worker to complete a **Working Alone Safe Work Procedure Form**
- Provide Workers with appropriate information and training
- Evaluate safety measures on a regular basis to ensure that the measures taken are working and reassess when changes occur in business operation
- Make every reasonable effort to ensure compliance by the Worker

## RISK ASSESSMENT

**Low Risk Activity:** minimal hazards with respect to the activity and the work environment (administrative duties such as general office work, computer work, etc.)

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**Medium Risk Activity:** minor hazard(s) exist in the activity and/or the work environment, but the risk is decreased by the control measures in place (janitorial/custodial duties that do not involve use of hazardous substances or materials, shipping/receiving duties that do not include forklift operation, off-site or after-hours duties that do not include any of the tasks listed as a high-risk activity)

**High Risk Activity:** considerable hazards in the activity and/or the work environment, but risks are minimized by multiple effective control measures (heights, confined spaces, electricity, chemicals, hazardous substances or materials, equipment or machinery, materials at high pressure, operate, repair and/or maintain heavy equipment, where there is a potential for violence)

**WORKING ALONE SAFE WORK PROCEDURE (SWP) FORM**

Information detailed on the SWP will include, but is not limited to, the following:

- Identifying the worker and work location
- Time frame in which working alone assignment will occur
- Identifying the possible risks and specific hazards that may be encountered
- Outlining the procedures to eliminate or minimize the identified risks
- Identifying the “Buddy” or designated contact person and their contact information
- Establishing the method and means of communication
- Check-in procedure including no contact procedures
- Providing details of how emergency assistance will be obtained in the event of an injury or incident
- List of other documentation or related materials that may assist in training the lone worker
- Maintaining a copy of the SWP on file and updating procedures as necessary

**CHECK -IN PROCEDURES**

Individuals who are working alone, off-site or after hours must make provisions to have their status checked by another individual to verify that they have not encountered any health, safety or security incidents. The frequency and method of checking on the individual depends on the degree of hazard of the work and the work environment. If practicable, the Supervisor/Buddy/Designate may call or visit the Worker periodically between check-in intervals to ensure safety.

To implement an effective check in procedure, the following should be addressed:

- Itinerary – agenda or completed **Travel Itinerary Form**
- Communication method - verbal or visual check-in, cell phone, landline, text, email
- Communication frequency
- Written check-in log
- No contact procedures
- Emergency procedures

The action required in the event of an emergency will be influenced by the location of the worksite, job factors, and the event which necessitated calling the emergency.

As lives often depend upon emergency procedures, it is important to preplan, document and execute the actions agreed upon on the SWP in the event that things do not go as intended. If there is ever any doubt as to whether or not to call for emergency assistance, it is far better to err on the side of safety rather than risk serious harm to an individual.

**FOLLOW UP**

The Supervisor shall conduct a post-assignment meeting with the lone worker and, if applicable, his “Buddy” or designated contact person to follow up on the assignment. Discussion will include:

- An overview of how the job went
- The effectiveness of the Safe Work Procedures
- Risks and hazards that were not identified in the original assessment – review/update Job Hazard Assessment

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- Challenges/obstacles
- Report injuries, illnesses, near misses, property damage or motor vehicle accident – complete Incident Report

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## Policy & Procedure: P211(a)

### Subject: Emergency Response (Ontario - AODA Compliant)

#### PURPOSE

The purpose of this policy is to establish and maintain procedures in the event of an emergency situation, and to ensure that all reasonable precautions and steps are taken to protect the safety of employees and visitors in the event of an emergency situation.

#### SCOPE

This policy is applicable to all employees of FST Canada Inc. (the “Company”), its contractors, suppliers, customers and visitors.

#### POLICY

In the event of an emergency where serious injury may occur, established procedures and protocols will be outlined in the branch specific Emergency Response Plan and must be followed. These procedures will address emergency situations such as fire, threats or acts of violence, and general evacuations of any nature.

This policy is in compliance with the **Accessibility for Ontarians with Disabilities Act, 2005, Ontario Regulation 191/11 Integrated Accessibility Standards**

#### DEFINITIONS

**The “Company”** - FST Canada Inc., operating as various business entities.

**Emergency Response Plan (ERP)** – A document that effectively responds to an emergency situation that could cause death, injury, disruption of operations or physical or environment damage

**Emergency Preparedness** – Training for the response of an emergency situation

**Fire Marshal** – A designated person(s) at each branch who will be responsible for maintaining an ordering evacuation, conduct a sweep of their area(s), and cooperate and communicate with fire officials

**Manager Designate** – This will be the most Sr. Manager that is on site at the time of the emergency

#### ROLES AND RESPONSIBILITIES

The following responsibilities apply:

##### Employer will:

- Ensure that an Emergency Response Policy and corresponding Emergency Response Plans are developed, maintained, and responsibilities are delegated
- Ensuring the necessary resources and training are provided to all employees

##### Manager/Supervisors will:

- Provide and maintain an updated emergency contact list
- Ensure employees participate in the Emergency Response training and all emergency response drills

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- Ensure the branches Emergency Response plan is communicated and made available to all employees and visitors at their branch

**Employees will:**

- Follow the Emergency Responses Plan procedures in the event of an emergency
- Participate in training
- Participate in all emergency response drills

**Manager Designate will:**

- Assume overall command of the emergency situation
- Participate in emergency response drills
- Cooperate and communicate with emergency response officials
- Participate in debriefing resulting from an emergency situation

**Fire Marshals will:**

- Execute the emergency response plan
- Conduct a sweep of their area to ensure evacuation is complete, including.
  - Washrooms, rest areas, or any place where alarms may not be audible
- Ensure building entrances are not congested
- Assist the Manager Designate in assuming overall command of the emergency situation
- Participate in emergency response drills when required
- Cooperate and communicate with emergency response officials
- Participate in debriefing resulting from an emergency situation

**Joint Health and Safety Committee (JHSC)/Health and Safety Members will:**

- Conduct emergency response drills at a minimum of once per year
- Participate in the evaluation of the drill results and assist in conducting a risk assessment to determine potential gaps in the Emergency Response Plan procedures
- After an emergency event, participate in the evaluation of the Emergency Response Plan to determine the effectiveness and to identify gaps in the plan based on those events
- Conduct risk assessments to determine potential emergency situations and the branch's ability to respond to the identified emergencies
- Based on the risk assessments and the evaluations of an evacuation drill or after an emergency event, make continuous improvement and corrective action recommendations to Management to address any findings

**Human Resources will:**

- Update or create new emergency response procedures in response to newly identified emergency situations
- Retain training records
- Develop individual emergency response plans as requested by those who acknowledge barriers in the workplace in case of emergency

**Visitors & General Public will:**

- Follow the Emergency Response Plan and its procedures in the event of an emergency

**PROCEDURES**

In the event of an emergency, the procedures outlined in each branch's Emergency Response Plan (ERP) must be followed. The emergency response procedures apply to all employees, visitors, and contractors of the Company. Should an emergency occur that is not addressed in the ERP, the Fire Marshals and Designate Manager on site should lead in the decision-making and provide direction in order to ensure everyone is kept as safe as possible.

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**An Emergency Response Plan includes:**

- Identification of emergency responses to incidents and disasters specific to their location which may include but are not limited to.
  - Fire or Explosion
  - Severe Storms or Tornadoes
  - Environmental Hazards
  - Active Shooter or Act of Violence
  - Serious Injury
- Written emergency procedures to respond to each potential emergency incident or disaster. The plan includes:
  - Emergency contact list
  - Employee personnel emergency contact list
  - Communication procedures
  - Evacuation and Take-Cover (shelter) information and procedures

The following must occur at each branch:

- Employee must be trained to understand their responsibilities related to emergencies and disasters in the workplace
- Fire Marshals must be established and trained to perform specific tasks to facilitate the Emergency Response Plan procedures
- An emergency contact list must be posted on the health and safety board
- The Emergency Response Plan must be posted at the designated exits of the building as well as on the health and safety board

**Emergency Response Off-site**

- Where employees perform work at sites that are not on the Company premises, all Company managers must know the whereabouts of their employees and have established check-in procedures. Employees must complete a risk-assessment of potential emergencies prior to performing their work at that site.

**Alternative Formats**

The Company is dedicated to ensuring the health and safety of all employees, contractors, visitors, and customers. As such, the Company will provide the emergency response plan in a format that considers the individual needs of the person who requested it.

A designated Fire Marshal and/or Manager/Supervisor will work with the individual, as soon as practicable, to identify solutions and options that consider their needs. Alternative options include, but are not limited to:

- Enlarged text.
- Braille format.
- Communication support either in person or over the phone; and
- Documents provided by e-mail.

If an alternate format of this information is required, please contact:

Human Resources  
(705-733-7700)  
hrsupport@jjei.com  
Innisfil, Ontario

If an employee is temporarily or permanently disabled by any barriers in the workplace, they should contact the Human Resource Manager to request an individual emergency response plan that acknowledges and responds to those barriers in case of emergency. Tailored emergency response plans are available to employees who may face

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special risks due to a disability and, with the employee's permission, the Company will share that information with a designated person in the organization who agrees to help that employee during an emergency.

## **COMMUNICATION**

All employees must be aware of the Emergency Response Plans and Procedures. Communication of these procedures will be reviewed with the department supervisor through the new hire health and safety orientation process.

Visitors will be accompanied by a Company representative who will advise the visitor to stay with them during an emergency situation as well as point out the emergency exits and designated meeting point.

## **TRAINING**

The Company will ensure that all employees are trained and educated on the Emergency Response Plan and ensure that they are clear about their roles and responsibilities as well as this policy and its procedures.

Any of the following method(s) may be used to communicate this policy:

- Company email
- Company memo
- Posting of policies and procedures
- Training
- Meetings and Safety talks

The individuals assigned specific responsibilities during an emergency will be trained on their responsibility annually. Human resources will retain records of training.

Practical training will occur during planned drills. Employees will sign and date attendance at the drills, as required.

## **EVALUATION**

The JHSC/ Health and Safety Representatives will evaluate the Emergency Response Plan annually, as a minimum to ensure:

- Emergency Response Plans are created for high-risk emergency situations and are current
- Training has occurred as required
- Emergency contact list is current

## **EXHIBITS/FORMS**

F211.1 – Emergency Response Drill Record

F211.3 – Emergency Response Accommodation Form (Ontario)

P206 – Incident Reporting and Investigations Policy

(SMARTSHEET) – Incident Reporting Form

P208 – Workplace Violence, Harassment, and Sexual Harassment Prevention and Reporting Policy

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## Policy & Procedure: P211(b)

### Subject: Emergency Response (Manitoba - AMA Compliant)

#### PURPOSE

The purpose of this policy is to establish and maintain procedures in the event of an emergency situation, and to ensure that all reasonable precautions and steps are taken to protect the safety of employees and visitors in the event of an emergency situation.

#### SCOPE

This policy is applicable to all employees of FST Canada Inc. (the “Company”), its contractors, suppliers, customers and visitors.

#### POLICY

In the event of an emergency where serious injury may occur, established procedures and protocols will be outlined in the branch specific Emergency Response Plan and must be followed. These procedures will address emergency situations such as fire, threats or acts of violence, and general evacuations of any nature.

This policy has been updated to reflect the Accessible Employment Standard Regulation under the **Accessibility for Manitobans Act (AMA)**.

#### DEFINITIONS

**The “Company”** - FST Canada Inc., operating as various business entities.

**Emergency Response Plan (ERP)** – A document that effectively responds to an emergency situation that could cause death, injury, disruption of operations or physical or environment damage

**Emergency Preparedness** – Training for the response of an emergency situation

**Fire Marshal** – A designated person(s) at each branch who will be responsible for maintaining an ordering evacuation, conduct a sweep of their area(s), and cooperate and communicate with fire officials

**Manager Designate** – This will be the most Sr. Manager that is on site at the time of the emergency

#### ROLES AND RESPONSIBILITIES

The following responsibilities apply:

##### Employer will:

- Ensure that an Emergency Response Policy and corresponding Emergency Response Plans are developed, maintained, and responsibilities are delegated
- Ensuring the necessary resources and training are provided to all employees

##### Manager/Supervisors will:

- Provide and maintain an updated emergency contact list
- Ensure employees participate in the Emergency Response training and all emergency response drills
- Ensure the branches Emergency Response plan is communicated and made available to all employees and visitors at their branch

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**Employees will:**

- Follow the Emergency Responses Plan procedures in the event of an emergency
- Participate in training
- Participate in all emergency response drills

**Manager Designate will:**

- Assume overall command of the emergency situation
- Participate in emergency response drills
- Cooperate and communicate with emergency response officials
- Participate in debriefing resulting from an emergency situation

**Fire Marshals will:**

- Execute the emergency response plan
- Conduct a sweep of their area to ensure evacuation is complete, including.
  - Washrooms, rest areas, or any place where alarms may not be audible
- Ensure building entrances are not congested
- Assist the Manager Designate in assuming overall command of the emergency situation
- Participate in emergency response drills when required
- Cooperate and communicate with emergency response officials
- Participate in debriefing resulting from an emergency situation

**Joint Health and Safety Committee (JHSC)/Health and Safety Members will:**

- Conduct emergency response drills at a minimum of once per year
- Participate in the evaluation of the drill results and assist in conducting a risk assessment to determine potential gaps in the Emergency Response Plan procedures
- After an emergency event, participate in the evaluation of the Emergency Response Plan to determine the effectiveness and to identify gaps in the plan based on those events
- Conduct risk assessments to determine potential emergency situations and the branch’s ability to respond to the identified emergencies
- Based on the risk assessments and the evaluations of an evacuation drill or after an emergency event, make continuous improvement and corrective action recommendations to Management to address any findings

**Human Resources will:**

- Update or create new emergency response procedures in response to newly identified emergency situations
- Develop individual emergency response plans as requested by those who acknowledge barriers in the workplace in case of emergency
- Retain training records

**Visitors & General Public will:**

- Follow the Emergency Response Plan and its procedures in the event of an emergency

**PROCEDURES**

In the event of an emergency, the procedures outlined in each branch’s Emergency Response Plan (ERP) must be followed. The emergency response procedures apply to all employees, visitors, and contractors of the Company. Should an emergency occur that is not addressed in the ERP, the Fire Marshals and Designate Manager on site should lead in the decision-making and provide direction in order to ensure everyone is kept as safe as possible.

**An Emergency Response Plan includes:**

- Identification of emergency responses to incidents and disasters specific to their location which may include but are not limited to.
  - Fire or Explosion

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- Severe Storms or Tornadoes
- Environmental Hazards
- Active Shooter or Act of Violence
- Serious Injury
- Written emergency procedures to respond to each potential emergency incident or disaster. The plan includes:
  - Emergency contact list
  - Employee personnel emergency contact list
  - Communication procedures
  - Evacuation and Take-Cover (shelter) information and procedures

The following must occur at each branch:

- Employee must be trained to understand their responsibilities related to emergencies and disasters in the workplace
- Fire Marshals must be established and trained to perform specific tasks to facilitate the Emergency Response Plan procedures
- An emergency contact list must be posted on the health and safety board
- The Emergency Response Plan must be posted at the designated exits of the building as well as on the health and safety board

Emergency Response Off-site

- Where employees perform work at sites that are not on the Company premises, all Company managers must know the whereabouts of their employees and have established check-in procedures. Employees must complete a risk-assessment of potential emergencies prior to performing their work at that site.

### Alternative Formats

**Note:** Under the Accessible Employment Standards Regulation, only large employers and public-sector employers must provide this document in an accessible format.

The Company is dedicated to ensuring the health and safety of all employees, contractors, visitors, and customers. As such, the Company will provide the emergency response plan in a format that considers the individual needs of the person who requested it. If an alternate format of this information is required, please contact:

Human Resources  
(705-733-7700)  
hrsupport@jjei.com  
Innisfil, Ontario

If an employee is temporarily or permanently disabled by any barriers in the workplace, they should contact the Human Resource Manager to request an individual emergency response plan that acknowledges and responds to those barriers in case of emergency. Tailored emergency response plans are available to employees who may face special risks due to a disability and, with the employee's permission, the Company will share that information with a designated person in the organization who agrees to help that employee during an emergency.

A designated Fire Marshal and/or Manager/Supervisor will work with the individual, as soon as practicable, to identify solutions and options that consider their needs.

### COMMUNICATION

All employees must be aware of the Emergency Response Plans and Procedures. Communication of these procedures will be reviewed with the department supervisor through the new hire health and safety orientation process.

Visitors will be accompanied by a Company representative who will advise the visitor to stay with them during an emergency situation as well as point out the emergency exits and designated meeting point.

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## **TRAINING**

The Company will ensure that all employees are trained and educated on the Emergency Response Plan and ensure that they are clear about their roles and responsibilities as well as this policy and its procedures.

Any of the following method(s) may be used to communicate this policy:

- Company email
- Company memo
- Posting of policies and procedures
- Training
- Meetings and Safety talks

The individuals assigned specific responsibilities during an emergency will be trained on their responsibility annually. Human resources will retain records of training.

Practical training will occur during planned drills. Employees will sign and date attendance at the drills, as required.

## **EVALUATION**

The JHSC/ Health and Safety Representatives will evaluate the Emergency Response Plan annually, as a minimum to ensure:

- Emergency Response Plans are created for high-risk emergency situations and are current
- Training has occurred as required
- Emergency contact list is current

## **EXHIBITS/FORMS**

F211.1 – Emergency Response Drill Record

F211.2 – Emergency Response Accommodation Form (Manitoba)

P206 – Incident Reporting and Investigations Policy

(SMARTSHEET) – Incident Reporting Form

P208 – Workplace Violence, Harassment, and Sexual Harassment Prevention and Reporting Policy

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## Policy & Procedure: P211(c)

### Subject: Emergency Response (All Other Jurisdictions)

#### PURPOSE

The purpose of this policy is to establish and maintain procedures in the event of an emergency situation, and to ensure that all reasonable precautions and steps are taken to protect the safety of employees and visitors in the event of an emergency situation.

#### SCOPE

This policy is applicable to all employees of FST Canada Inc. (the “Company”), its contractors, suppliers, customers and visitors.

#### POLICY

In the event of an emergency where serious injury may occur, established procedures and protocols will be outlined in the branch specific Emergency Response Plan and must be followed. These procedures will address emergency situations such as fire, threats or acts of violence, and general evacuations of any nature.

#### DEFINITIONS

**The “Company”** - FST Canada Inc., operating as various business entities.

**Emergency Response Plan (ERP)** – A document that effectively responds to an emergency situation that could cause death, injury, disruption of operations or physical or environment damage

**Emergency Preparedness** – Training for the response of an emergency situation

**Fire Marshal** – A designated person(s) at each branch who will be responsible for maintaining an ordering evacuation, conduct a sweep of their area(s), and cooperate and communicate with fire officials

**Manager Designate** – This will be the most Sr. Manager that is on site at the time of the emergency

#### ROLES AND RESPONSIBILITIES

The following responsibilities apply:

##### Employer will:

- Ensure that an Emergency Response Policy and corresponding Emergency Response Plans are developed, maintained, and responsibilities are delegated
- Ensuring the necessary resources and training are provided to all employees

##### Manager/Supervisors will:

- Provide and maintain an updated emergency contact list
- Ensure employees participate in the Emergency Response training and all emergency response drills
- Ensure the branches Emergency Response plan is communicated and made available to all employees and visitors at their branch

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**Employees will:**

- Follow the Emergency Responses Plan procedures in the event of an emergency
- Participate in training
- Participate in all emergency response drills

**Manager Designate will:**

- Assume overall command of the emergency situation
- Participate in emergency response drills
- Cooperate and communicate with emergency response officials
- Participate in debriefing resulting from an emergency situation

**Fire Marshals will:**

- Execute the emergency response plan
- Conduct a sweep of their area to ensure evacuation is complete, including.
  - Washrooms, rest areas, or any place where alarms may not be audible
- Ensure building entrances are not congested
- Assist the Manager Designate in assuming overall command of the emergency situation
- Participate in emergency response drills when required
- Cooperate and communicate with emergency response officials
- Participate in debriefing resulting from an emergency situation

**Joint Health and Safety Committee (JHSC)/Health and Safety Members will:**

- Conduct emergency response drills at a minimum of once per year
- Participate in the evaluation of the drill results and assist in conducting a risk assessment to determine potential gaps in the Emergency Response Plan procedures
- After an emergency event, participate in the evaluation of the Emergency Response Plan to determine the effectiveness and to identify gaps in the plan based on those events
- Conduct risk assessments to determine potential emergency situations and the branch’s ability to respond to the identified emergencies
- Based on the risk assessments and the evaluations of an evacuation drill or after an emergency event, make continuous improvement and corrective action recommendations to Management to address any findings

**Human Resources will:**

- Update or create new emergency response procedures in response to newly identified emergency situations
- Retain training records

**Visitors & General Public will:**

- Follow the Emergency Response Plan and its procedures in the event of an emergency

**PROCEDURES**

In the event of an emergency, the procedures outlined in each branch’s Emergency Response Plan (ERP) must be followed. The emergency response procedures apply to all employees, visitors, and contractors of the Company. Should an emergency occur that is not addressed in the ERP, the Fire Marshals and Designate Manager on site should lead in the decision-making and provide direction in order to ensure everyone is kept as safe as possible.

**An Emergency Response Plan includes:**

- Identification of emergency responses to incidents and disasters specific to their location which may include but are not limited to.
  - Fire or Explosion
  - Severe Storms or Tornadoes
  - Environmental Hazards

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- Active Shooter or Act of Violence
- Serious Injury
- Written emergency procedures to respond to each potential emergency incident or disaster. The plan includes:
  - Emergency contact list
  - Employee personnel emergency contact list
  - Communication procedures
  - Evacuation and Take-Cover (shelter) information and procedures

The following must occur at each branch:

- Employee must be trained to understand their responsibilities related to emergencies and disasters in the workplace
- Fire Marshals must be established and trained to perform specific tasks to facilitate the Emergency Response Plan procedures
- An emergency contact list must be posted on the health and safety board
- The Emergency Response Plan must be posted at the designated exits of the building as well as on the health and safety board

Emergency Response Off-site

- Where employees perform work at sites that are not on the Company premises, all Company managers must know the whereabouts of their employees and have established check-in procedures. Employees must complete a risk-assessment of potential emergencies prior to performing their work at that site.

## COMMUNICATION

All employees must be aware of the Emergency Response Plans and Procedures. Communication of these procedures will be reviewed with the department supervisor through the new hire health and safety orientation process.

Visitors will be accompanied by a Company representative who will advise the visitor to stay with them during an emergency situation as well as point out the emergency exits and designated meeting point.

## TRAINING

The Company will ensure that all employees are trained and educated on the Emergency Response Plan and ensure that they are clear about their roles and responsibilities as well as this policy and its procedures.

Any of the following method(s) may be used to communicate this policy:

- Company email
- Company memo
- Posting of policies and procedures
- Training
- Meetings and Safety talks

The individuals assigned specific responsibilities during an emergency will be trained on their responsibility annually. Human resources will retain records of training.

Practical training will occur during planned drills. Employees will sign and date attendance at the drills, as required.

## EVALUATION

The JHSC/ Health and Safety Representatives will evaluate the Emergency Response Plan annually, as a minimum to ensure:

- Emergency Response Plans are created for high-risk emergency situations and are current
- Training has occurred as required
- Emergency contact list is current

P211(c) – Emergency Response (All other jurisdictions)	H&S Policies & Procedures	Review Date: December 2019	Revision Date: January 2020
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## EXHIBITS/FORMS

F211.1 – Emergency Response Drill Record

P206 – Incident Reporting and Investigations Policy

(SMARTSHEET) – Incident Reporting Form

P208 – Workplace Violence, Harassment, and Sexual Harassment Prevention and Reporting Policy

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## Policy & Procedure: P212

### Subject: First Aid

#### PURPOSE

To ensure that any person injured or ill in the workplace shall be provided with the utmost care, and that prompt and proper first aid will be administered by a certified First Aid Attendant.

#### SCOPE

This policy applies all employees, customers and visitors of the Company (FST Canada Inc.).

#### POLICY

The scope of the program will include First Aid treatment and reporting as well as the maintenance of the First Aid stations and training. First Aid emergency medical treatment will be administered to an injured or sick person before professional medical care is available. The Company is committed to meeting all legislative regulations regarding First aid facilities, training, records, and reporting under the respective Provincial or State Occupational Health and Safety Regulations and Workers Compensation Board.

The Company shall meet all legislative requirements regarding First Aid, including:

- The Company shall ensure that at least one person with appropriate first aid training is scheduled and present on every shift
- The designated first aider will always be available to render assistance during that shift
- A copy of the legislated (WSIB or WCB) First Aid/Injury Poster will be posted in a high-visibility location
- Injuries that occur in the workplace will be recorded and reported
- The Company will investigate all accidents that result in injury or illness

To ensure that we have this assistance available to all employees, each Company branch must have the following:

- 1) **Certified First Aid Attendants** – per provincial or state legislative requirements – certificates must be in good standing and posted on Health & Safety boards at each Company's branch.
- 2) **First Aid Kit** – must have the required supplies as per provincial or state legislative requirements.
- 3) **Naloxone Kit - nasal spray** - must have the required supplies as per provincial or state legislative requirements.
- 4) **First Aid Record Form** – must be completed in the event of an incident that requires supplies be used from a First Aid Station. Completed forms must be provided to Supervisors for confidential record keeping, and for potential use in an investigation. Training must be provided to all employees as to First Aid reporting procedures. The First Aid Record Form will contain the following information:
  - Date and time of accident
  - Date reported
  - Name of person injured
  - Where injury occurred
  - Description of injury or illness
  - Cause of injury or illness
  - First Aid provided
  - Name of First Aider

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## DEFINITIONS

The “Company” - FST Canada Inc., operating as various business entities.

**First Aid** - As described by the WSIB/WCB, first aid includes, but is not limited to:

- Cleaning minor cuts, scrapes, or scratches.
- Treating a minor burn.
- Applying bandages and/or dressings.
- Applying a cold compress, cold pack, or ice bag.
- Applying a splint.
- Changing a bandage or a dressing after a follow-up observation visit.

**Life-threatening Injury** – an injury involving a substantial risk of death; loss or substantial impairment of the function of a bodily member, organ, or mental faculty that is likely to be permanent; or an obvious disfigurement that is likely to be permanent

**Non-Life-threatening Injury** – an injury that doesn’t put the victim’s life directly at risk

**Opioids:** Drugs with pain-relieving properties, primarily used to treat pain. They can also induce euphoria, sometimes resulting in them being used recreationally. This combination of properties can lead to dependence and substance abuse. An overdose of opioids can be fatal.

**Opioid Poisoning:** Opioid poisoning occurs when a person has excessive unopposed stimulation of the opiate pathway. This can lead to decreased respiratory effort and possibly death.

**Naloxone hydrochloride (naloxone):** A fast-acting drug that can temporarily reverse the effects of an opioid poisoning.

## ROLES AND RESPONSIBILITIES

The following responsibilities apply:

### Employer will:

- Ensure that the number of First Aid associates, their qualification as well as their training complies with the respective Provincial or State Occupational Health and Safety Regulation
- Provide all First Aid services, supplies and equipment, and when required, a first aid room according to respective Provincial or State Occupational Health and Safety Regulations - First Aid Requirements
  - Including:
    - each remote location where work is being performed
    - each Company vehicle or rental vehicle used for Company business
- Keep first aid treatment records
- Post First aid certificates of all trained First-Aid associates at all First Aid Stations
- Ensure the required documentation is created and posted, employees are made aware of the requirements of this standard and will retain First Aid Incident Reports and First Aid Inventory Logs for a period of two years, as a minimum.
- Identify first aid equipment and training requirements for the facility as defined by the Provincial or State regulations.

### Manager/Supervisors will:

- Ensure appropriate first aid treatment is provided, and the necessary incident reports are completed
- Ensure that first aid kits are located within quick and easy access for all employees
- Ensure that appropriate numbers of staff have first aid and CPR training based on various shift and off-site work schedules

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- Communicate requirement to notify a supervisor of any injury and illness requiring first aid attention to employees during orientation.

**Employees will:**

- Report all injuries and illnesses to their supervisor immediately and will obtain the necessary first aid treatment

**Joint Health and Safety Committee (JHSC)/Health and Safety Members will:**

- Assist with the evaluation of the program by periodically inspecting the condition of the first aid stations and verifying that inspection of the first aid equipment has been conducted at the specified frequency.

**Human Resources will:**

- Ensure the training requirements are met and will retain records of training

**First Aiders will:**

- Ensure appropriate first aid treatment is provided promptly and will complete the First Aid Report and/or incident report as required
- Arrange for transportation to a medical treatment facility via ambulance (life-threatening injury or symptom) or by other means such as a taxi (non-life-threatening injury or symptom)
- Participate in First Aid Training from a WSIB/ WCB approved organization
- Conduct first aid kit inspections on a regular schedule, and maintain records
- Participate in investigations of all accidents that result in injury

**Visitors & General Public will:**

- Report all injuries and illnesses to the Company and will receive the necessary first aid treatment

**PROCEDURE**

- The Company’s Emergency procedures and Emergency phone number shall be posted at the first aid station
- First-aid kits shall be inspected monthly and maintained by the designated first aid associate who works in the vicinity of the area
- First-aid kits shall be restocked as needed with items as prescribed by the appropriate regulation at the expense of the Company
- All First Aid services, First Aid equipment and supplies shall be in or near the worksite and will be accessible during all working hours
- All First Aid supplies and equipment will be maintained by the Company in a clean, dry and working condition
- All supplies and equipment shall be stored in a container which shall protect its content from the environment, and which clearly identifies the First Aid equipment and supplies
- The Company shall post, in a conspicuous place, signs which will indicate the location of the First Aid station and equipment. If signs are not practicable all workers must be informed of said location

**First Aid Kit Requirements**

The Company will stock all first aid kits in a manner that complies with local Provincial or State Legislation.

- **Ontario** - <https://www.wsib.ca/sites/default/files/documents/2019-01/faeng.pdf>
- **Alberta** – <https://open.alberta.ca/publications/fa011-workplace-first-aiders-and-legal-requirements>
- **Manitoba** - <https://web2.gov.mb.ca/laws/regs/current/217.06.pdf>
- **Quebec** - <http://legisquebec.gouv.qc.ca/en/showdoc/cr/A-3.001,%20r.%2010>
- **Nova Scotia** - <https://novascotia.ca/just/regulations/regs/ohsfirst.htm>
- **New York** [https://www.osha.gov/pls/oshaweb/owadisp.show\\_document?p\\_id=9863&p\\_table=standards](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_id=9863&p_table=standards)

**Inspection of First Aid Supplies**

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- The First Aid Inventory form, based on the requirements of Provincial or State Regulations, will be stored with the First Aid Supplies
- The First Aid Certified designate will inspect first aid stations monthly, but no less than quarterly, to ensure adequate supplies are available. First aid supplies must be in good condition and replenished as required.
- The First Aid Inventory form will be used to document the inspection. The Inspector will also sign and date the Inspection card posted at the First Aid Station. The First Aid Inventory form will be forwarded to the health and safety representative for retention.

**First Aid Treatment**

Only authorized and trained First Aid Attendants shall provide first aid treatment for which they have been trained.

First Aid Attendants shall follow universal precautions and ensure the scene is safe for themselves and others prior to administering first aid. The First Aid Associate will, as needed:

1. Contact Emergency Medical Services (EMS) as required by calling 9-1-1.
2. Request a by-stander to meet the EMS and direct them to the closest door to where first aid is being administered.
3. Provide the necessary first aid treatment.
4. If medical attention is required, the First Aid Associate will remain with the injured person until the EMS arrives.
5. Request Human Resources to notify the employee’s emergency contact when emergency medical attention is required.
6. Arrange transportation to a medical clinic or hospital for "non-life-threatening injuries or symptoms".
7. Ensure that the employee takes the Injured Worker Package with them prior to them leaving the facility. This package includes the medical practitioner form and offer of available modified duties.

If the injured worker requires “Emergency Care” and is taken by Ambulance to a hospital with "life-threatening injuries and symptoms", the Regional Director and or Human Resources will notify the injured person's next of kin / emergency contact (where applicable) immediately and provide an update of the status of the injured persons' condition.

**Post Incident Duties**

- Dispose of contaminated waste first aid supplies in the designated waste receptacle
- Disinfect surfaces at the first aid station and any other contaminated surface (i.e. floors, machinery, parts, etc.). Dispose of cleaning supplies in designated waste receptacle
- Arrange to have first aid supplies replenished.
- Document first aid treatment of minor injuries (such as small cuts) on the First Aid Report Log located with the first aid kit.
- Supervisor to document injury or illness incidents that require more comprehensive first aid treatment or medical treatment using the Incident Reporting and Investigation Form.

**TRANSPORTATION**

The Company will ensure that appropriate transportation of an injured or ill employee is provided when treatment with a health care facility is necessary.

All "life-threatening" emergencies require professional intervention, 9-1-1 should be immediately called and EMS will provide care and transportation of an employee to a medical facility

Emergency care will usually be warranted anytime:

- Something that shouldn’t be in the body enters the body

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- The body is unable to maintain what it needs to survive (like blood or oxygen)
- Pain becomes so severe that it interferes with normal day to day activities
- Person appears incoherent and not in their usual frame of mind (possible sign of severe heat related injuries or severe head injuries)

Other examples of "life-threatening injuries and symptoms" include, but are not limited to:

- Compound fractures
- Seizures
- Major head injuries
- Severe pains
- Ingestion of poisons
- Bites
- Severe burns
- Chest pains
- Difficulty breathing

If an ambulance 911/EMS is called the EMS will have an employee "sign off" if they refuse care/transportation.

The Company will offer transportation arrangements to a medical clinic or hospital for "non-life-threatening injuries or symptoms."

Examples of "non-life-threatening injuries and symptoms" include, but are not limited to:

- Allergic reactions
- Minor aches and pains
- Sprains
- Injuries only requiring stitches
- Minor fractures
- Mild fever
- Sore throat
- Nausea
- Superficial cuts and scrapes, etc.

## **RECORDS**

The Company shall create and maintain First Aid records. These records will include the following information as outlined in the respective Provincial or State Occupational Health and Safety Regulation:

- the name of the worker.
- the date and time of the illness or injury.
- location at the work site that the incident occurred.
- the nature of injury/illness
- the work-related cause of the incident, if any
- the first aid treatment provided to the injured/ill worker.
- time first aid was provided
- injured or ill worker's signature
- the First Aid Associate's signature; and
- the date and time the illness or injury was reported
- name of person to whom the injury was reported

All First Aid related records will be kept for a minimum of three years from the date the incident was recorded.

## **COMMUNICATION**

The Company will post the information required by WSIB/WCB at or near the first aid station and in other conspicuous places (Health and Safety Boards). Posting requirements will at a minimum include:

- WSIB/WCB legislated poster

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- The valid first aid certificates of the trained First Aid Associates
- Inspection record with the most recent inspection date and signature of the person completing the inspection.
- Copy of the Provincial or State First Aid Regulation
- Emergency Contact Numbers

Any of the following method(s) may be used to communicate this policy:

- Company email
- Company memo
- Posting of policies and procedures
- Training
- Meetings and Safety talks

## **TRAINING**

The Company will ensure that all employees appointed as First Aid Associates are trained and educated in First Aid and CPR/AED and are clear about their roles and responsibilities as well as this policy and its procedures.

The Company will coordinate training to ensure enough First Aid Attendants are trained to meet legislative requirements and will ensure that there is a qualified First Aid Attendant available at all times and who works in the immediate vicinity of each first aid station.

Human Resources will retain training records and local branch health, and safety representatives will ensure copies of the first aid certificates are posted at the first aid station.

## **CONFIDENTIALITY**

The Company shall ensure that no employee will have access to other employees' records unless:

- The record does not identify the worker.
- The worker has given their written permission; or
- Access, use and disclosure of the information is in accordance with the Province or State authorities or requires the authorized disclosure.

## **EVALUATION**

Joint Health and Safety Committees or Health and Safety Reps will periodically evaluate the program during the monthly inspections to ensure the inspections are being conducted at the specified frequency and to verify first aid stations are in good condition and accessible.

The Company will evaluate the First Aid Program annually, as a minimum to ensure:

- Required material is posted.
- First aid stations are inspected at the appropriate frequency and supplies are replenished, as needed.
- Inspection reports are available and signed. Latest inspection report is posted.
- First aid reports are completed for first aid injuries.
- Current training certificates for designated first aiders are posted.

## **EXHIBITS/FORMS**

St. John Ambulance – OHS Regulations (indicates provincial requirements)  
First Aid Inventory Form  
First Aid Report Log  
F226.1 Incident Reporting and Investigations Form

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## Policy & Procedure: P213

### Subject: Fire Prevention, Impairment and Extinguishers

#### PURPOSE

To ensure fire extinguisher inspections are completed, extinguishers are in good working condition and that training is provided on the use of a fire extinguisher in the event of a fire.

#### SCOPE

This policy is applicable to all employees of the “Company” (FST Canada Inc.).

#### POLICY

All branches will have Fire Emergency Response Procedures in their Emergency Response Manual. A review of these procedures as well as the conducting and documentation of fire drills must be completed at least annually.

**Although we strongly encourage everyone to always put their safety first**, all employees and some specified Contractors will be instructed on the locations and use of fire extinguishers as a component of their orientation training.

Extinguishers will be located throughout the Company workplace in accordance with provincial and state guidelines.

- Any employee performing work where there is a potential for fire must have a fire extinguisher at hand.
- All Company Service vehicles must be equipped with a fire extinguisher.
- All fire extinguishers in Company workplaces must be rated for A, B and C class fires.

#### FIRE CLASSIFICATIONS

**Class A** - combustible materials such as paper or wood

The preferred method of extinguishment is to use water to cool or remove the heat.

**Class B** - flammable liquids such as oil, solvents, and gasoline

The preferred method of extinguishment is to smother with carbon dioxide or dry chemicals if the fire is small (e.g., a grease fire in a restaurant) or to cool with water if the fire is large (e.g., a petroleum tank fire).

**Class C** - electrical

Water cannot be used in this situation because of the possibility of electrocution. Carbon dioxide is the recommended medium for extinguishment. In some special cases, such as computer rooms, halon may be used.

#### DEFINITIONS

**Contractor/Maintenance** – is any person or organization responsible for assuring that all Fire Protection Systems are functioning and in proper working condition or those who perform fire system installation, maintenance, testing, repair or other operation which requires impairment of a fire system.

**Fire Protection Systems** – shall include automatic fire sprinklers, standpipe systems, fire alarms and detection systems, under/above ground water supply mains, chemical fire suppression systems, fire doors, stench systems and other alarms used to warn employees of a potential hazard.

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**Impairment** – is any situation in which all or part of a Fire Protection System is turned off, damaged, interrupted, disabled, or otherwise temporarily rendered inoperable. Impairment includes maintenance, repair, or alteration of a Fire Protection System.

## **ROLES AND RESPONSIBILITIES**

### **The Employer:**

- Will assure this standard is followed when any Fire Protection System is to be worked on.

### **Managers/Supervisors:**

- Can be a Company employee or a contractor/vendor working or traveling on any Company site. They are responsible for enforcement of all requirements, rules, and established guidelines as outlined in this procedure. They ensure personnel are provided with the necessary and proper training and instructions for this procedure.

### **Employees:**

- All employees in any position whether COMPANY or contracted employees working on any COMPANY site. They are responsible for complying with the requirements as outlined in this procedure.

### **Contractors/Vendors:**

- Businesses performing a service for the Company. They are responsible for ensuring their employees working on Company sites understand and comply with the requirements as outlined in this procedure.

### **Visitors:**

- Anyone not employed by the Company in any capacity but are traveling or touring on a Company site. They are responsible for complying with the requirements as outlined in this procedure.

## **PREVENTION**

The following are the elements of fire:

- 1) Fuel, which is any combustible material.
- 2) Heat, spark, or other source of ignition.
- 3) Air, which includes the oxygen necessary for burning; and
- 4) Chemical reaction caused when the above three elements combine.

Oxygen, heat, and fuel compose what is known as the fire triangle. When chemical reaction is included, it is now known as a fire tetrahedron. If you remove any one of the four elements the fire will be extinguished. Fires can be prevented by keeping the first three elements of fire from combining.

Sources of ignition such as a spark, friction, hot surfaces, or processes emitting hot air can cause a fire when you add oxygen, thus forming the fire triangle.

When we suppress a fire using a fire extinguisher, we do two things:

1. We starve the fire of oxygen or smother it
2. We discontinue the chemical reaction because we have soaked the combustible and removed the oxygen

However, when the fire extinguisher is emptied, the oxygen can return, the combustible still exists, and the heat can remain in the fire. The chemical reaction then causes re-ignition of the fire.

**WHEN IN DOUBT, GET OUT!**

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## **IMPAIRMENT PROCEDURE**

This procedure assures that when a Fire Protection System is disabled, interrupted, or damaged that proper steps are taken to reduce possible loss during an emergency while the system is impaired.

An impairment is anything that results in the planned or unplanned shutdown of a fire protection system. This includes, but is not limited to, the shutdown of the fire protection water supplies, sprinklers, fire pumps, special protection systems, and fire alarm system controlling interlocks.

The Company will use FM Global's Red Tag Permit system at the 2521 Bowman St. Innisfil, ON location to manage all impairments caused by employees, contractors, or their subcontractors.

The Company will select a Contractor, who specializes in Fire Safety, Prevention and Inspection as the Company's designated Fire Safety inspector.

### **BEFORE AN IMPAIRMENT**

- Plan to work on fire protection when the facility is not operating. Shut down any hazardous processes.
- Prohibit any process with an inherent ignition source, such as hot work. Smoking also should be prohibited.
- Be prepared. Have everything ready before impairing protection, e.g., excavating equipment, pipe plugs, repair parts and personnel.
- Plan to have temporary fire protection on hand: extra extinguishers, charged hose lines, temporary sprinkler protection, etc.
- Notify your emergency response team (ERT) and the public fire service so they can be ready to handle any emergency that might occur.
- Assign a fire watch to patrol the area where protection is impaired.

### **NOTIFICATION**

The following departments shall be notified by the Branch Senior Manager for all Fire Protection System impairments.

- Site Health and Safety Representatives
- Service Department employees
- Warehouse employees

Written notification of Fire Protection System impairments is required 5 days in advance when substantial risk to life or property is involved, critical operations are affected, numerous occupants are affected, or the impairment is for an extended period of time (in excess of 24 hours). All coordination and scheduling of impairments shall be completed a minimum of 48 hours prior to the impairment, except for minor and emergency outages which are addressed below.

Minor and emergency fire system impairments may be accomplished with less than 48 hours' notice, provided that all notification and coordination is complete. Minor fire system impairments may ONLY be serviced by qualified.

Fire system impairments considered to be minor in nature include:

- Fire system testing
- Maintenance and repairs which are of a short duration
- 24 hours or less
- Do not impact critical operations
- Do not include substantial risk for loss of life or property

When a fire system is placed back in service, all personnel who were previously notified of the system impairment shall be notified that the fire system is back in service.

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## RESTRICTIONS

No automatic fire sprinkler system shall be turned off or otherwise rendered inoperable while welding, cutting or other open flame work is in progress.

No contractor or COMPANY employee shall operate or impair any Fire Protection System unless they are qualified.

## SYSTEM IMPAIRMENT

- Before the scheduled impairment of any Fire Protection System, the Service and Parts department shall be notified. The Manager/Supervisor shall ensure adequate Emergency Response capability.
- All work on a Fire Protection System shall, when possible, be continuous until the system is restored to operational status. All work on a Fire Protection System shall be completed as quickly as possible to minimize downtime.
- Upon completion of all Fire Protection System work, all affected components of the system shall be inspected and tested by a qualified person to ensure they are operating correctly.
- All fire systems shall be mechanically secured when they are placed back in service (fire alarm system panels shall be locked, fire sprinkler system valves shall be locked open, etc.)
- Any unauthorized fire system impairment shall be reported to the Manager for immediate follow-up and initiation of appropriate action.

## INSPECTIONS

**Monthly:** Members of the JHSC/Branch Representatives will receive instruction on what to look for when inspecting a fire extinguisher as part of their JHSC/Branch Membership Orientation Training and will be responsible to conduct a visual inspection of all fire extinguishers each month as part of their regular workplace inspection. The inspection will confirm the extinguishers are in the proper location, have not been used or tampered with since the last inspection, are fully charged and have no obvious signs of physical damage that might prevent its effective operation. They will locate the inspection tag and initial beside the month that they are conducting the inspection.

Any deficiencies found during this monthly inspection will be documented and corrective action will be taken to replace the fire extinguisher immediately.

**Annually:** Every year a qualified supplier will conduct an inspection of the sprinkler system quarterly (at applicable locations), extinguishers monthly, and emergency lighting annually. These inspections will also include:

- 1) **Maintenance** - a “thorough check” of the extinguisher, intended to give maximum assurance that the extinguisher will operate effectively and safely. This includes a thorough examination, including necessary repair or replacement, and must be conducted by qualified personnel. Maintenance shall be conducted at least annually and must comply with all manufacturers’ requirements.
- 2) **Recharging** - includes the replacement of the extinguishing agent, and the propellant for most types of extinguishers. Recharging must be conducted by only trained personnel to comply with all manufacturers’ specifications. Extinguishers shall be recharged after each use, or as indicated by inspection or maintenance.
- 3) **Sprinkler Inspection** – Water flow switch and valve inspections and flow tests of all wet pipes

**Hydrostatic Testing** - a pressure test to determine whether the extinguisher is capable of withstanding the pressures to which it is subjected during use must be carried out annually by qualified personnel trained and equipped to conduct such testing.

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## **Policy & Procedure: P214**

### **Subject: Chemical Spill Response**

#### **PURPOSE**

To provide employees with guidelines for spill prevention and spill response. Responding to chemical spills can lead to severe illness and injuries, and environmental damages when not approached properly. The purpose of this policy is to establish requirements and a procedure to respond to a workplace chemical spill in an effective and safe manner.

#### **SCOPE**

This policy is applicable to all employees of the “Company” (FST Canada Inc.), and its contractors.

#### **POLICY**

The Company is committed to the prevention of chemical spills in its operation. If a spill were to occur the Company will ensure the proper response is taken to mitigate any associated risks as well as to follow all legislative measures.

There shall be a minimum of two employees at each branch trained in spill response and will comprise the “Spill Response Team” (SRT), one of which shall be in a management position. Only the Spill Response Team shall respond to and attempt the clean-up of a chemical spill.

**Clean up is only permitted when the chemical is known.** Government Emergency Response must be contacted to remove any unknown chemical spills.

The safety the Company’s employees are our first priority – DO NOT put yourself or others at risk.

Each Company premise should have at least two (2) spill kits on site.

#### **DEFINITIONS**

**The “Company”** - FST Canada Inc., operating as various business entities.

**Chemical** – Any substance used in, or obtained by a chemical process

**Hazardous Material** – Any substance or material that could adversely affect the safety of the public, handlers, and/or environment

**Pollutant** – A substance or condition that contaminates air, water, or soil. **Pollutants** can be artificial substances, such as pesticides and PCBs, or naturally occurring substances, such as oil or carbon dioxide, that occur in harmful concentrations in a given environment.

**Reportable Spill** – Reportable spill is defined as a release of a pollutant that is likely to be an imminent environmental or human health hazard. It must be reported.

**Small Spill** – A spill of 5-10L or less of material; considered a low-risk spill

**Medium Spill** – A spill of 10L-22L of material; considered a moderate to high-risk spill

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**Large Spill** – A spill greater than 22L; considered a high-risk spill

**SDS** – Safety Data Sheet is a summary document that provides information about the hazards of a product and advice about safety precautions. SDSs are usually written by the manufacturer or supplier of the product

## **PREVENTION**

### **ROLES AND RESPONSIBILITIES**

The following responsibilities apply:

#### **Employer will:**

- Assess the workplace for any possible hazards associated with spills
- Prepare a written hazard assessment which will be reviewed periodically and changed as required
- Take all precautions to eliminate or control all identified hazards
- Involve workers in the hazard assessment and control process
- Educate all workers on the hazards and the methods of elimination or control

#### **Spill Response Team (SRT) will:**

- Take all necessary precaution to protect themselves and other worker's health and safety
- Participate in all training
- Provide consultation and assistance in the management of spills when requested
- Ensure that appropriate spill response materials and personal protective equipment are available and accessible
- Ensure that all spills or incidents involving hazardous materials are reported to the branch Health and Safety Committee and to HR by submitting a Spill Response Report (Form F214.1)

#### **Manager/Supervisors will:**

- Take all precautions to eliminate or control all identified hazards
- Report all hazards and spills
- Notify the SRT and First Aid Responders to attend a spill site
- Contact the Government Emergency Spill Response department (refer to Reporting section in this policy for details)
- Participate in completing the Spill Response Report form with the SRT

#### **Employees will:**

- Take all necessary precaution to protect themselves and other worker's health and safety
- Participate in all training
- Report any hazards or spills

#### **Joint Health and Safety Committee (JHSC)/Health and Safety Members will:**

- Inspect the kit containers and contents monthly at the time of the departmental inspections (verify proper WHMIS and workplace labels are affixed to containers)

#### **Human Resources will:**

- Provide a Spill Response policy
- Training Spill Response Team members and Managers/Supervisors on Spill Response procedures, and hazard identification
- Maintain copies of training documentation, electronically and in employee files
- Participate in the incident reporting procedure
- Track and analyze incidents for trending and prevention initiatives

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**Visitors & General Public will:**

- Report any hazards or spills to their designated Company employee

**INSPECTIONS**

- Spill kit containers and contents will be inspected monthly at the time of the workplace inspections.

**STORAGE HANDLING**

- The Company will ensure that all substances are stored in a safe location in compliance with all legislation and manufacturer's specifications
- The Company will ensure all substances are handled appropriately according to all health and safety guidelines and best practices

**KITS**

- Spill response materials or spill kits will be readily available for any anticipated spills
- A proper spill kit will contain the appropriate supplies for materials that may be spilled
- Supplies will be easily accessible when required, and considerations will be made for both the type and quantity of materials
- The contents of spill response kits shall be periodically assessed to ensure the availability of adequate spill response supplies

**SDS (Safety Data Sheets)**

- SDSs will have specific information on "Preventive Measures" which will outline the specific procedures to be followed if the product is spilled.
- Employees will be trained on how to read and where to find SDSs.
- Assessments shall be required once a spill has occurred to assist in the determination of the following:
  - What components make up the spill.
  - How dangerous is the spill.
  - How far has the spill travelled.
  - What damage has been caused by the spill.
  - What remedial action is required to alleviate damage caused by the spill; and
  - If there has been environmental damage.

**PROCEDURE**

**NOTIFICATION:**

When an individual has identified a spill has occurred, immediately:

- 1) The individual will alert others in the immediate vicinity and notify a manager
- 2) The Manager will notify the SRT and First Aid Responders to attend the spill site
- 3) If the chemical is unknown, extremely hazardous and may pose a risk to the health and safety of the SRT or if the spill is too large, the Manager must contact Government Emergency Spill Response (please refer to Reporting a Spill in this policy for details)
- 4) The SRT will instruct all employees, contractors, and anyone else who may be exposed to leave the area
- 5) In accordance with the Emergency Evacuation Plan, use 3 long air horns to evacuate the facility. Refer to the Emergency Evacuation Policy for further details.
- 6) The SRT will notify all Managers once the area is free from associated hazards
- 7) Managers will notify employees that it is safe to return to regular work

**RESPONSE:**

**SRT Responder(s):**

- 1) Secure the area to prevent unauthorized entry

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- 2) Identify the chemical
  - i. Obtain as much information as possible from the employee, the container label and/or from the Safety Data Sheet (SDS)
  - i. Using the SDS, obtain information re: personal protective equipment, first aid measures, and data relating to fire or reactivity risk.
- 3) Ensure all SRT's and First Aiders wear the appropriate PPE
- 4) Assess the scene for any other hazards
- 5) Use the chemical spill kit to contain the spill
- 6) Eliminate any fire or explosive hazards
- 7) Shut off any valves and turn off ignition sources in the presence of flammables if safe to do so.
- 8) Disperse gases or vapors to outside atmosphere using doors, windows, exhaust systems, fans, etc.
- 9) Notify First Aid Responders in the event of exposure
- 10) Before returning the spill response kit to its designated storage location, an inventory of all items will be conducted, and all replacement items will be ordered.

**First Aid Responder(s):**

- 1) Follow all protocols as outlined in the First Aid Policy
- 2) In a safe location, treat injuries and illnesses using SDS if available
- 3) Complete all related documentation (First Aid Report Form, Incident Report Form)

**CONTAINMENT:**

Only clean up a spill when the chemical is known and is considered to be a small to moderate size spill. Do not put yourself or others at risk. The clean-up method depends on the situation, product, SDS specifications and resource affected.

- Initiate spill containment by first determining what will be affected by the spill
- Assess speed and direction of spill and cause of movement (water, wind, slope)
- Determine best location for containing spill, avoid any water bodies
- Wear the proper PPE
- Contain spill by securing floor drains, shut down ventilation, assess the need to evacuate the facility
- Methods of clean up include absorbents, pumps, and vacuums
- Initiate the clean from the far end of the spill moving toward the center of the spill
- Ensure the clean-up process is very thorough
- Refer to the **Safe Work Procedure (SWP)** for Spill Containment

**ON-SITE RESOURCES:**

Spill kits are located throughout the site. The contents are described below.

- Spill Kit Bags: (10) 15 X 19" Pads, (2) 3" x 4' Sorbent Socks, (1) pair Nitrile Gloves, Instructions and Disposal Bag.
- Spill Kit 55-Gallon Drum: (50) 15 x 19" Pads, (4) 3" x 12' Sorbent Socks, (8) 18 x 18" Pillows, (1) Paid Nitrile Gloves, Emergency Handbook, Goggles, and (5) Disposal Bags.
- Dry Absorbent

**DISPOSAL:**

Once the spill has been cleaned, proper disposal of contaminated items must take place.

- Do not mix contaminated water with other materials
- Dispose of waste as indicated in the SDS and applicable municipal requirements
- Store contaminated materials in an approved waste container in a designated area until a designated disposal company can be contacted and the material is removed
- All PPE used during the Spill Response will be thoroughly cleaned or properly disposed

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## REPORTING:

### WHEN:

Any reportable spills must be brought to the attention of a direct supervisor as soon as it is immediately safe to do so, the supervisor will then contact their respective Ministry of Environment if:

- The spill may, is, or has caused an adverse effect and/or
- The spill is oil or gas if it is not confined to the site from which it occurred or is on-site and is in excess of two cubic metres
- Damage property or cause injury to animal life
- Impair the quality of the natural environment (air, water or land)
- Cause negative health effects
- Create a safety risk
- Render the environment unfit for use
- Create a loss of enjoyment of the normal use of the property
- Cause a disruption with the normal conduct of business

### HOW:

- **Halifax:** Nova Scotia Environment → 1-500-565-1633
- **Quebec:** Urgence-Environment → 1-866-694-5454
- **Ontario:** Ministry of Environment and Climate Change's Spill Action Center → 1-800-268-6060
- **Manitoba:** Manitoba Conservation → 1-204-944-4888
- **Alberta:** Alberta Environment and Parks → 1-800-222-6514

### WHAT TO REPORT:

Should Government Emergency Spill Response need to be contacted, the Manager will provide the following information (if known):

- Location (address, phone number)
- Chemical information
- Quantity spilled
- When the spill occurred
- What has been done and if help is needed
- Environmental conditions and possible hazards (explosive, near high temperatures)

### INVESTIGATION:

The JHSC/Branch Health and Safety Representatives will conduct an investigation with the assistance of the SRT, Manager, Workers and/or witnesses. Should an injury/ exposure occur, the injured/exposed employee would complete an Incident Reporting and Investigation form and include witnesses and the JHSC/branch Health and Safety Representative. Refer to P206 Incident Reporting and Investigation. All findings will be documented and submitted to HR and will be discussed at the next JHSC/H&S meeting. Refer to Form F214.1 for the Company Spill Response Report Form.

### NON-COMPLIANCE

The Company understands that if we are responsible for a spill, and cannot respond to properly clean up the spill, the Minister has the authority under the *Environmental Protection Act* to order those responsible to clean it up. As well, failing to do so could result in the ministry undertaking the cleanup and recovering from the company the costs.

### COMMUNICATION

Any of the following method(s) may be used to communicate this policy:

- Company email
- Company memo
- Posting of policies and procedures
- Training

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- Meetings and Safety talks

### **TRAINING**

The Company will ensure that all employees are trained and educated on spill prevention and response procedures, and that they are clear about their roles and responsibilities as well as this policy and its procedures. Training may be performed in-house or by a 3<sup>rd</sup> party.

### **EVALUATION**

The Company will review the policy, with the JHSC as required, at least annually, and or/after a spill incident.

### **EXHIBITS/FORMS**

F214.1 Spill Response Report Form

F214.2 SWP Spill Response

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## Policy & Procedure: P215

### Subject: Personal Protective Equipment (PPE)

#### PURPOSE

The purpose of this policy is to minimize injuries to employees by the use of Personal Protective Equipment.

#### SCOPE

This policy is applicable to all employees of the “Company” (FST Canada Inc.), its contractors, suppliers, customers and visitors.

#### POLICY

The Company is concerned about the protection of its employees from occupational injuries and illnesses. All employees of the Company have and assume the responsibility of working safely. The objective of this program is to:

- Provide safety standards specifically designed to cover Personal Protective Equipment (PPE)
- Ensure that each employee is trained and made aware of the safety procedures which are associated with PPE

It is our policy to require that Personal Protective Equipment be used by employees whenever workplace hazards are discovered that could damage any part of the body.

**NOTE:** PPE is not to be used and will not be used as a substitute for safe work practices, machine guards, or other controls designed by equipment manufacturers or other engineering sources. PPE is to be used in conjunction with these controls to increase employee protection.

The PPE provided to an employee should be of a type and condition that will provide the employee with an appropriate level of protection given the work environment, as per recognized protection and manufacturer standards.

PPE provided to an employee may be replaced at any time as deemed appropriate, by the Company.

Clothing to protect an employee from adverse weather is only provided to employees who are required to work outdoors on a regular basis, or who are required to regularly operate or travel in open vehicles.

The Company determines the PPE that may be issued to employees. In making such a determination, the Company will consider the relevant legislation (eg: *OHS Act*), risk factors, the season in which the employee is working, and the nature of the work.

The following is a list of PPES that may be required while performing work and it must meet or exceed current CSA standards.

- Head Protection
- Foot Protection
- Eye Protection
- Hearing Protection
- Face Protection
- Limb and Body Protection
- Respirators

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- Other Applicable Equipment

## DEFINITIONS

The “Company” - FST Canada Inc., operating as various business entities.

PPE – Personal Protective Equipment - is any device worn by a worker to protect against hazards. Some examples are respirators, gloves, ear plugs, hard hats, safety goggles, and safety shoes or boots.

## ROLES AND RESPONSIBILITIES

The following responsibilities apply:

### Company will:

- Establish safe work procedures and provide task specific instruction and observation
- Provide appropriate PPE and make it available to employees

### Manager/Supervisors will:

- Implement and enforce PPE use and policies in their work area.
- Ensure employees are trained on the proper use, care, and cleaning of PPE
- Ensure that defective or damaged PPE is immediately disposed of and replaced

### Workers will:

- Properly wear PPE as required
- Attend required training sessions
- Properly care for, cleaning, maintaining, and inspecting PPE as required
- Following PPE policies and procedures
- Inform the supervisor of the need to repair or replace PPE

Employees who repeatedly disregard and do not follow PPE policies and rules will be subject to disciplinary action.

### Contractors will:

- Properly wear PPE as required in specified areas and as required by specific tasks being performed

### Visitors will:

- Properly wear PPE as required in specified areas

## PROCEDURE

### HEAD PROTECTION

Must be worn in any work area where there is a danger of head injury from overhead work, falling objects or other harmful contacts.

### FOOT PROTECTION

To ensure all applicable Employees possess the approved foot protection with minimal personal financial impact, the Company shall provide the following:

- All shop and warehouse staff shall receive a reimbursement of **\$180.00** towards the purchase on an annual basis.
- All other staff members who are required to work in the designated areas shall receive reimbursement towards the purchase on an as needed basis upon Manager’s approval, but no more than once per year.

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Foot protection can be a boot or shoe that is CSA approved and must have a steel toe as a minimum requirement. As a best practice, protective footwear should be oil resistant, slip resistant and be 6 to 8 inches in height. The softer the rubber or polyurethane sole the more slip resistant the boot will be.

**Foot Protection must:**

- Be worn at all times in designated areas as indicated by signage, where hazards exist from falling or rolling objects, uneven terrain, abrasion, extreme temperatures, corrosive substances, punctures, crushing, electrical shock or any other recognizable hazards
- Be of a design, construction and material appropriate for the protection required for the work and the environment
- Use dielectric protection where employee may be subjected to an electrical hazard. Dielectric protection must be made of rubber.
- Safety toe caps are available for any individual who will be entering a designated area and are not in the possession of personal foot protection

**EYE PROTECTION**

To ensure all applicable Employees who require wearing prescription eyewear, the Company shall provide the following:

- Applicable employees who work permanently in the shop shall receive a **\$300.00 reimbursement** towards the purchase of prescription safety glasses every two years

Safety Eye Wear must be CSA approved protective eyeglasses or CSA approved protective prescription glasses, both must be equipped with side shields or CSA approved protective eye goggles or face shield.

**Safety Eye Protection must:**

- Be worn at all times in designated areas as indicated by signage, and while operating any hand- held power tools or when working in conditions that are likely to injure or irritate the eyes.
- Must fit properly
- Must include side shields
- Must be free from scratches

**Persons requiring corrective eye wear shall wear:**

- Goggles that can be properly worn over corrective eye wear or CSA approved prescription safety glasses

**HEARING PROTECTION**

- Must be worn where noise exposure levels are greater than 85 decibels (daily noise exposure level)
- Where noise levels cannot be practically met, the Company will implement the following controls:
  1. Post warning signs regarding noise hazard areas
  2. Provide hearing protection (ear plugs) and ensure use in noise hazard areas
  3. Where the Workers are exposed for an extended period of time on a regular basis, appropriate hearing protection such as rated earmuffs are required

**FACE PROTECTION**

Must be worn where there is a risk of face injury, while performing welding work, using grinders, cut off saws or where a risk of exposure to a carcinogenic chemical exists

**LIMB AND BODY PROTECTION**

**NOTE:** Due to the nature of our business and the associated biohazards, the Company provides gloves and uniform service to all Workers who may be at risk of exposure. Uniforms, gloves and foot protection should not be worn outside of the workplace as cross-contamination may occur.

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## **CLOTHING**

### **Non-Flammable clothing:**

- Must be worn where the Worker may be exposed to sparks or sources of ignition
- Cotton coveralls are recommended

### **Welding Apron:**

- Must be worn where flame retardant uniforms are not available, and the Worker maybe exposed to sparks or sources of ignition
- Must cover the front of the body

## **HAND PROTECTION**

**NOTE:** There is no glove that provides protection against all potential hand hazards. Therefore, it is important to select the most appropriate glove for a particular application.

### **Selecting task appropriate hand protection:**

Factors to consider include the degree of dexterity required, the duration and frequency of use, the degree of exposure of the hazard and the physical stresses that will be applied. Types of hand protection provided include latex gloves, work gloves, neoprene gloves.

Gloves:

- Must be CSA approved
- Must be worn where Worker's hands are exposed to hazards such as those from skin absorption or harmful substances, severe cuts or lacerations, severe abrasions, punctures, chemical burns, thermal burns and harmful temperature extremes
- Must be free from holes
- Must be made from material that provides adequate grip
- Must be impermeable when handling chemicals

## **RESPIRATORY EQUIPMENT**

Many types of respirators are available to protect against a variety of atmospheric hazards. It is important that the respirator being used for the particular job protects against the hazard in question. Using the wrong respirator is as dangerous as not wearing one at all.

### **Disposable respirators:**

- Must be worn where dusts, mists and fumes may be inhaled
- Must be discarded after use
- Not intended for use in oxygen deficient atmospheres

### **Chemical cartridge respirators:**

- Must be worn where gases, particulate and organic vapors may be inhaled
- One wearer per mask – not to be shared
- Must fit well and provide a proper seal to the wearer's face as tested by a competent person
- The wearer must be tested at least annually or when there is significant weight loss or gain to ensure proper fit and seal
- Respirator will be replaced when seal is broken and no longer prevents exposure, and the wearer can smell or taste airborne contaminants
- Inside of mask should be cleaned after every use in order to prevent bacteria accumulation
- Are not intended for use in oxygen deficient atmospheres

## **HI-VISIBILITY VESTS**

- Must be worn when working on or near a roadway, on premises where mandated to comply with site specific policy, or where low visibility due to weather or nightfall may present a risk to the Worker
- International orange or fluorescent contrasting with the environment
- Stripes shall be retro-reflective and fluorescent

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- Designed with side and front tear-away features

## **TRAINING**

All employees who are expected to wear Personal Protective Equipment as part of their job shall be trained in the proper selection, fitting, use, cleaning maintenance and storage of that equipment.

The Company will provide on-going training:

- At regular intervals
- When employees use PPE on an infrequent basis
- When new equipment is introduced into the workplace
- When there is a change in legislation

## **COMMUNICATION**

**The Company will:**

- Provide consistent, coordinated, timely, and effective communications of this policy and the requirements of Personal Protective Equipment.
- Ensure that employees have access to readily accessible and appropriate Personal Protective Equipment.

Any of the following method(s) may be used to communicate this policy:

- Company email
- Company memo
- Posting of policies and procedures
- Training
- Meetings and Safety talks

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## Policy & Procedure: P216

### Subject: Fall Arrest and Elevated Platforms

#### PURPOSE

The purpose of this fall protection program is to establish guidelines to protect all employees of the “Company” (FST Canada Inc.), engaged in outdoor or indoor work activities that expose them to potential falls from elevations.

#### SCOPE

The scope of this fall protection program is applicable to all Company employees and Contractors. In particular, those staff engaged in work activities which expose them to falls from heights of 6 feet or more.

#### POLICY

Through effective education and controls, the use of fall protection systems, and enforcement of the program, prevention of falls from elevations of 6 feet or higher may be achieved.

While off site, any trained employee required to use the fall arrest system shall notify their Manager/Supervisor prior to working. The Supervisor/Manager shall review the task to examine if any engineering controls can be used prior to working at heights.

When working at heights is required, the Supervisor shall determine the level of risk associated with the task. If a high level of risk is possible, a spotter will be provided in the event of a fall. Should there be less of a risk, the Supervisor shall give the employee authorization to perform and use the equipment. The Supervisor shall continue to monitor the employee periodically.

#### DEFINITIONS:

**Anchor Point** – A secure point of attachment for lifelines, lanyards, or deceleration devices. An anchor point must be capable of supporting at least 5000 pounds (3600 pounds if engineered/certified by a qualified person) per person and must be independent of any anchorage being used to support or suspend platforms.

**Full Body Harness** – Webbing/straps which are secured about an employee’s body in a manner that will distribute the fall arrest forces over the thighs, pelvis, waist, chest and shoulders. Having means for attaching it to other components of a personal fall arrest system, preferably at the shoulders and/or middle of the back. It is recommended to have a fall arrest harness with a D-ring in the mid to upper back, for which to connect the lanyard.

**Connector** – A device which is used to couple (connect) parts of the personal fall arrest system together.

**Cage** – A device used in conjunction with a regulated forklift to help lift and lower trained people from heights greater than 6 feet. The cage will be equipped with a safety bar on all side and have a constructed steel hook on the back of the cage to link the fall arrest harness.

**Free Fall** – The act of falling before a personal fall arrest system begins to apply force to arrest the fall.

**Free Fall Distance** – The vertical displacement of the fall arrest attachment points on the employee’s body harness between the onset of the fall and just before the system begins to apply force to arrest the fall. Free fall distance must not exceed 6 feet. **This distance excludes deceleration distance and lifeline/lanyard elongation distance.**

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**Total Fall Distance** – The maximum vertical change in distance from the bottom of an individual’s feet at the onset of a fall, to the position of the feet after the fall is arrested. This includes the free fall distance and the deceleration distance.

**Guardrail System** -- A barrier erected to prevent employees from falling to lower levels. This system includes a toe board, mid-rail and top-rail able to withstand 200 pounds of force applied in any direction.

**Lanyard** – A flexible line of rope or strap that has self-locking snap hook connectors at each end for connecting to body harnesses, deceleration devices and anchor points. A lanyard can be shocking absorbing, tie back or self-retracting.

**Lifeline** – A component consisting of a flexible line for connection to an anchorage at one end to hang vertically (vertical lifeline), or for connection to anchorages at both ends to stretch horizontally (horizontal lifeline). This serves as a means for connecting other components of a personal fall arrest system to the anchorage.

**Personal Fall Arrest System** – A system used to arrest (catch) an employee in a fall from a working level. It consists of an anchorage location, connectors, a body harness, and may include a lanyard, deceleration device, lifeline, or any combination of the before-mentioned items.

**Toe board** – A low protective barrier that will prevent the fall of materials and equipment to lower levels, usually 4 inches or greater in height.

**Unprotected Sides and Edges** – Any side or edge of a walking or working surface (e.g., floor, roof, ramp, runway, etc.) where there is no guardrail at least 39 inches high.

## FALL PROTECTION SYSTEMS

Appropriate fall protection will be determined by the task (job) to be performed.

- 1) An articulating man lift provided with a restraint system and full body harness to an anchor point below the waist (preferably at the floor level)
- 2) Guardrail with a toe board, mid-rail and top rail (i.e. cage)
- 3) Personal fall arrest systems
  - Anchor points (rated at 5000 pounds per person)
  - Full body harness
  - Restraint line or lanyard
  - Retractable lanyard
  - Rope grabs
  - Connectors (self-locking snap hooks)
- 4) Engineered lifelines

## LOCATIONS

Fall protection is required wherever the potential to fall 6 feet or more exists. The Company has identified the following places concerning fall protection:

- All equipment vehicles, when the employee is required to be on top of the vehicle and where the top of the vehicle is 6 feet or above
- All exterior and interior equipment platforms, mezzanine and balcony edges, catwalks, without the required foot board, mid and upper rails
- All exterior and interior fixed ladders above 6 feet
- All open excavations or pits
- All tasks requiring use of the articulating man lifts
- All tasks requiring employees to lean outside the vertical rails of ladders (i.e., painting, stairwell light bulb replacement, etc.)
- Scaffolding structure – 6 feet in height or greater

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## CONTROLS

Evaluate the task and examine other feasible options prior to working at heights whenever possible or utilizing a contractor in extremely hazardous areas.

### Guardrails:

On all projects, only guardrails made from steel, wood, and wire rope will be acceptable. All guardrail systems will comply with the current standards (i.e., contain a 42" high top-rail, a mid-rail and toe board, which can withstand 200 pounds of force in any direction). These guardrails will be placed in the following areas if necessary or feasible based on job location or requirements:

- On all open sided floors
- On leading edges of mezzanines
- Any man lifts

### Personal Fall Protection Systems:

All employees on any project that will be required to wear a personal fall arrest or restraint system will follow these guidelines:

- 1) A full body harness will be used at all times
- 2) Only shock absorbing lanyards or retractable lanyards are to be used so as to keep impact forces at a minimum on the body
- 3) Only nylon rope or nylon straps with locking snap hooks are to be used for restraints
- 4) All lanyards will have self-locking snap hooks
- 5) The employee will inspect all personal fall arrest equipment before each use. Any deteriorated, bent, damaged, impacted, and/or harness showing excessive wear will be removed from service

### Total Free Fall Distance:

The maximum free fall distance is not to exceed 6 feet. Consideration must be given to the total fall distance. The following factors can affect total fall distance:

- Length of connecting fall arrest (i.e. lanyard length, use of carabineers, snap hooks, etc.)
- Position and height of anchorage relative to work platform/area (keep above the head whenever possible).
- Position of attachment and D-ring slide on the full body harness.
- Deployment of shock absorber (max. 42").
- Movement in the lifeline.
- Initial position of worker before free fall occurs (i.e., sitting, standing, etc.).

**Total Free Fall Distance Calculation** = total length of shock absorbing lanyard + height of the person + the location distance of the D-ring from the work surface or platform

**Always allow a minimum of 6 feet of clearance above the ground, equipment, etc., at the end of the fall from the fall arrest point.**

### Engineered Lifeline:

Lifeline systems must be designed and approved by an engineer or competent person.

## INSPECTIONS

### Full Body Harnesses:

1. Inspect before each use
2. Closely examine all of the nylon webbing to ensure there are no burn marks, which could weaken the material
3. Verify there are no torn, frayed or broken fibers, pulled stitches or frayed edges anywhere on the harness
4. Examine the D-ring for excessive wear, pits, deterioration or cracks

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5. Verify that buckles are not deformed, cracked, and operate correctly
  6. Check to see that each grommet (if present) is secure and not deformed from abuse or a fall
  7. The harness should never have additional punched holes
  8. All rivets should be tight and not deformed
  9. Check tongue/straps for excessive wear from repeated buckling
- A competent person will complete an annual inspection of all harnesses and documentation will be maintained (see Appendix 1)
  - Storage will consist of hanging in an enclosed cabinet, to protect from damage
  - All harnesses that are involved in a fall will be destroyed

**Lanyards/Shock Absorbing Lanyards:**

1. Inspect before each use.
  2. Check lanyard material for cuts, burns, abrasions, kinks, knots, broken stitches and excessive wear
  3. Inspect the snap hooks for distortions in the hook, locks, and eye
  4. Check carabineer for excessive wear, distortion and lock operation
  5. Ensure that all locking mechanisms seat and lock properly
  6. Once locked, locking mechanism should prevent hook from opening
  7. Visually inspect shock absorber for any signs of damage, paying close attention to where the shock absorber attaches to the lanyard
  8. Verify that points where the lanyard attaches to the snap hooks are free of defects
- A competent person will complete an annual inspection of all lanyards and documentation will be maintained (see Appendix 2)
  - Storage will consist of hanging in an enclosed cabinet, to protect from damage
  - All lanyards that are involved in a fall will be destroyed

**Snap hooks:**

1. Inspect before each use.
  2. Inspect snap hook for any hook and eye distortions
  3. Verify there are no cracks or pitted surfaces
  4. The keeper latch should not be bent, distorted, or obstructed.
  5. Verify that the keeper latch seats into the nose without binding
  6. Verify that the keeper spring securely closes the keeper latch
  7. Test the locking mechanism to verify that the keeper latch locks properly
- A competent person will complete an annual inspection of all snap hooks and documentation will be maintained (see Appendix 3)
  - All snap hooks involved in a fall will be destroyed

**Self-Retracting Lanyards/Lifelines:**

1. Inspect before each use
  2. Visually inspect the body to ensure there is no physical damage to the body
  3. Make sure all nuts and rivets are tight
  4. Make sure the entire length of the nylon strap/wire rope is free from any cuts, burns, abrasions, kinks, knots, broken stitches/strands, excessive wear and retracts freely
  5. Test the unit by pulling sharply on the lanyard/lifeline to verify that the locking mechanism is operating correctly
- A competent person will conduct a monthly inspection of all self-retracting lanyards/lifelines and documentation will be maintained (see Appendix 4)
  - If the manufacturer requires, make certain the retractable lanyard is returned to the manufacturer for scheduled annual inspections

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- Service per manufacturer specifications (1-2 years)
- Inspect for proper function after every fall

**Tie-Off Adapters/Anchorages:**

1. Inspect for integrity and attachment to solid surface.
  - A competent person will complete an annual inspection of all tie-offs and anchorages and documentation will be maintained.
  - All tie-offs and anchorages will be destroyed after a fall.

**Articulating Man Lift:**

1. Inspect before each use.
2. Inspect/service per manufacturer guidelines. Forklift and scissors lifts will be inspected at the beginning of each day it is in use. Structural integrity of the forklift Cage will be checked per the same schedule.
  - A competent person will complete an annual inspection of the forklift Cage and documentation will be maintained.
  - Fall protection will be worn when working in lifts.

**Horizontal Lifelines:**

1. Inspect before each use for structural integrity of line and anchors.
  - A competent person will complete an annual inspection.

**Guardrails:**

- Temporary systems – Daily visual inspection will be completed by a competent person.
- Temporary systems – Weekly, a complete structural inspection will be completed by a competent person.
- Permanent systems – Annual structural inspections will be completed by a competent person with future frequency of inspection defined based on conditions/controls present.

**STORAGE & MAINTENANCE**

1. Never store the personal fall arrest equipment in the bottom of a toolbox, on the ground, or outdoors exposed to the elements (i.e., sun, rain, snow, etc.).
2. Hang equipment in a cool, dry location in a manner that retains its shape.
3. Always follow manufacturer recommendations for inspections.
4. Clean with a mild, nonabrasive soap and hang to dry.
5. Never force dry or use strong detergents in cleaning.
6. Never store equipment near excessive heat, chemicals, moisture, or sunlight.
7. Never store in an area with exposures to fumes or corrosive elements.
8. Avoid dirt or other types of build-ups on equipment.
9. Never use this equipment for any purpose other than personal fall arrest.
10. Once exposed to a fall, remove equipment from service immediately.

**TRAINING**

Document the attendance of all trainees (see Appendix 5). All employees engaged in fall protection will be trained and have the knowledge to:

1. Recognize the fall hazards of/on their job sites.
2. Understand the hazards associated with working near fall hazards.
3. Work safely in hazardous areas by utilizing appropriate fall protection measures.
4. Understand and follow all components of this fall protection program.
5. Identify and understand the enforceable CSA/OSHA standards and ANSI standards that pertain to fall protection.

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## **EMERGENCY REPSONSE**

### **The Company Premises**

Prior to beginning any work activity where fall protection equipment is going to be used, the following emergency response plan must be discussed and understood by employees in case of a fall:

1. The Supervisor will be notified
2. The Supervisor will assign a qualified employee to obtain either the articulating man lift or ladders where feasible.
3. The Supervisor will remain with the employee to ensure safety.
4. Both the assigned employee and the Supervisor will quickly, and with caution, rescue the fallen employees.
5. In the event where equipment will not allow for rescue or the employee is unconscious or significantly injured, the Supervisor will assign an employee to contact 911 emergency services.
6. All employees involved in a fall arrest or fall will be sent immediately for a medical evaluation to determine the extent of injuries, if any.

### **Off-site**

The most important step in this process is for the employee to advise their Manager/Supervisor of the fall arrest requirements, as well as another party who can assist in the rescue should the employee fall. Communication remains the same.

In the unlikely event that a fall occurs off-site (road mechanic) the following fall arrest and rescue plan shall include:

1. Prevention: any trained employee required to use the fall arrest system shall notify their Manager/Supervisor prior to working. If the employee has not received training, the employee is instructed not to use the fall arrest system nor are they able to work from heights above 6 feet.
2. The Supervisor/Manager shall review the task to evaluate if any engineering controls can be used prior to working at heights. When working at heights is required, the Supervisor shall determine the level of risk associated with the task.
3. If a high level of risk is possible, the employee is to request a fellow employee to be available in the event of a fall. Should no employee be available, the employee shall request the Manager on-site, customer or contractor to monitor them. Should a fall occur, the Manager on-site shall be called and will assign a qualified employee to obtain either the articulating man lift or ladders whenever feasible. The On-site Manager will remain with the employee to ensure safety and the assigned employee, and the Onsite Manager will quickly and with caution rescue the fallen employee(s). The employee is to provide these instructions to the customer/contractor prior to performing climbing. The in-house Manager/Supervisor shall continue to contact the employee during the task to ensure safety.
4. Should there be less of a risk, the Supervisor shall give the employee authorization to perform and use the equipment. The Supervisor shall continue to supervise the employee every 5 minutes during this plan through the phone system to request contact to ensure their safety. In the event of a fall, the employee is instructed to call 911 whenever feasible. In the event the employee does not respond to contact request. The Supervisor is to call 911 immediately.
5. In the event where equipment will not allow for rescue or the employee is unconscious or significantly injured, the Supervisor will assign an employee to contact 911 emergency services.
6. All employees involved in a fall arrest or fall will be sent immediately for a medical evaluation to determine the extent of injuries, if any.

## **NOTIFICATION**

In the event of a fall, the following people will be notified as soon as possible and in the following in order:

1. Manager/Supervisor
2. Assigned or dedicated employee
3. Fire Department and emergency medical services if necessary
4. HR Manager

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## **REPORTING**

As soon as practicable following the accident:

1. The Supervisor and Worker will complete the Occupational Injury/Illness Report Interviews with employees and witnesses, including customers or contractors
2. A copy will be sent to HR
3. With a JHSC Representative, the employee shall complete the Incident/Accident Investigation report
4. The JHSC Representative and the Supervisor shall also complete the Incident Accident Investigation report.

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## Policy & Procedure: P217

### Subject: Powered Lift Truck Policy and Procedure

#### PURPOSE

The purpose of this program is to establish procedures for the safe operation of powered lift trucks and to define standards and best practices that will aid in the prevention of any injury or possible fatality from happening while operating a powered lift truck.

#### SCOPE

This policy is applicable to all employees of FST Canada Inc. ("the Company") who operate powered lift trucks and other powered material handling equipment.

#### POLICY

The Company will adhere to all applicable legislated standards with regards to powered lift truck use, maintenance and training. No employee of the Company is to operate a powered lift truck without expressed authorization of management and without being deemed competent by management. The Company is committed to the safe operation practices of powered lift trucks and in an effort to reduce the risk associated with the operation of powered lift trucks, the Company has adopted the procedures contained within.

These procedures are based on best practices and are in compliance with legislation and are meant to be guidelines rather than exhaustive procedures. Compliance will require attention in the following areas:

- General safety inspection and maintenance
- Assessment of load-handling capacity
- Competence of person doing load-handling assessment
- Equipment Inspection and frequency
- Record keeping
- Operator competence
- Operating procedures
- Training

#### DEFINITIONS

**The "Company"** - FST Canada Inc., operating as various business entities.

**Lifting Device** – a device that is used to raise or lower any material or object and includes its rails and other supports but does not include a device to which the Elevating Devices Act applies. This definition clearly applies to powered lift trucks and should be interpreted broadly as including not just the elevating section of a truck but the entire vehicle.

**Powered Lift Truck** – Also referred to as a "forklift" is a powered industrial vehicle used to **lift** and transport materials for short distances.

**Competent Person** - "Competent person" is defined by the OHSA as someone who:

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

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## ROLES AND RESPONSIBILITIES

The following responsibilities apply:

### Employer will:

- Ensure that a lift truck safety program is developed for the workplace
- Provide safe equipment and resources necessary to implement this program and ensure this program is followed
- Ensure only competent persons as defined in the *Occupational Health and Safety Act (OHSA)* operate lift trucks
- Identify the ways in which a worker who operates or works around a powered lift truck could be harmed or injured, taking into consideration the equipment that will be used, the jobs to be done and the workplace environment
- Prepare a written report that mentions all the potential sources of harm or injury identified in step one above
- Periodically review the hazard assessment, in case there is a significant change in how the work is carried out, and make appropriate changes to the written report if necessary
- Ensure that all supervisors and workers who work around lift trucks have been informed of the hazards, instructed in the rules and procedures to avoid harm, and know where the written rules and procedures are located
- Inform supervisors and workers of any revisions to the rules and procedures arising from changes in the work

### Manager/Supervisors will:

- Identify Lift Truck hazards
- Ensure safe operating procedures are known, understood and used
- Arrange for yearly inspections of lift trucks to be conducted in accordance with legal requirements (as referred in *Regulations for Industrial Establishments*)
- Ensure powered lift trucks manuals are followed and available to workers
- Ensure maintenance and repair procedures are developed in accordance with the manufacturer's recommendations (including the maintenance of vehicle seats to control MSD hazards)
- Maintain inspection and maintenance documentation
- Ensure the appropriate staff are trained in the hazards and safe operating procedures for lift trucks (for example, supervisors, maintenance personnel)
- Confirm barriers, warning signs, or other safeguards are put in place
- Ensure all safety equipment is available and appropriately used, e.g. seatbelts
- Pre-use inspections are performed and documented
- Hazards that are reported are acted upon
- Lift trucks operators are regularly monitored to verify 'competence' as defined in the *Occupational Health and Safety Act (OHSA)* as an operator who understands sections of the Act and Regulation that apply to the work; hazards associated with the work (including those related to the operating environment; manufacturer's specifications and workplace-specific procedures and practices)
- Enforce procedures as necessary and ensure that employees who are found to have insufficient skills or understanding of safe powered lift truck operations receive retraining before continuing to operate any powered lift trucks
- Ensuring employees comply with all safe work practices described in this program
- Observing powered lift truck operations in their department and correcting any unsafe practices

### Employees will:

- Follow these safe work procedures developed by the Company
- Only operate powered lift trucks for which they have been specifically trained and authorized
- Operate all powered lift trucks in a safe manner, consistent with the powered lift trucks safe work practices
- Conduct powered lift trucks inspections at the beginning of each work shift and document the inspection on the appropriate inspection forms

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- Report all equipment malfunctions and/or maintenance needs to their supervisors immediately
- Wear a seatbelt at all times while operating a powered lift truck
- Notify their supervisors if they begin taking a Substance that impairs their ability to safety operate a powered lift truck
- Follow legal requirements
- Participate in training, skills evaluations, and retraining as required by the procedure.

**Joint Health and Safety Committee (JHSC)/Health and Safety Members will:**

- Participate in an annual review of this procedure and make recommendations if necessary
- Observe powered lift trucks operations and report unsafe practices to the appropriate supervisor
- Review copies of inspection checklists

**Human Resources will:**

- Ensure safe operating procedures are developed, known, understood and used
- Maintain copies of training and evaluation documentations, electronically and in employee files

**PROCEDURES**

*Powered lift trucks are widely used in Ontario industries and, as a result, all three Ministry sector regulations ([Mining and Mining Plants](#), [Construction Projects](#), and [Industrial Establishments](#)) have provisions that deal with them. The majority of companies are covered by the Regulation for Industrial Establishments, Regulation 851. For this reason the short discussion of the legal requirements, which follows, is restricted to the [Occupational Health and Safety Act](#) (OHSA) and Regulation 851 and the Guideline itself has been developed with these legal provisions in mind.*

**Training**

All employees required to operate a powered lift truck will be trained by a recognized training provider.

Employees who have not been trained and licensed, are not to operate a powered lift truck. If required, the Company will conduct a competency confirmation with the employee to ensure they are capable of safety operating the forklift

**Equipment Inspection and Frequency**

- An inspection of the powered lift truck is to be carried out at the beginning of the truck operator's shift.
- A checklist, to facilitate this pre-shift inspection, is to be used. The inspection should cover:
  - fork condition and wear
  - tire condition and pressure
  - fluid and fuel levels
  - battery condition and electrolyte levels
  - steering, brake, and limit switch operation
  - and cleanliness.
- The operator should also examine the chains and mast; check for damage or leaks; and inspect the condition of the lift mechanism.
- Any defects should be reported to the operator's supervisor. If possible, the powered lift truck will be immediately repaired. If immediate repair is not possible, a determination will be made as to whether the powered lift truck can be used safely until repairs can be made.
- Report to your Supervisor any damage or problems that occur to a powered lift truck during your shift
- Employees may not operate an unsafe powered lift truck at any time.
- Clause 51(1)(b) of Regulation 851 requires the load-handling capability to be assessed, after the initial examination, "as often as necessary but not less frequently than recommended by the manufacturer and in any case at least once a year.

**General Operating Procedures**

As a minimum, the following existing regulatory requirements are to be followed:

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- An operator must use all available safety devices available on a unit (i.e. seatbelt)
- No part of a load must pass over any worker.
- A lift truck left unattended must be immobilized and secured against accidental movement and forks, buckets or other attachments must be in the lowered position or firmly supported.
- No load may exceed the maximum rated load, and loads must be handled in accordance with the height and weight restrictions on the vehicle's load chart.
- When a load is in the raised position, the controls must be attended by an operator.
- If an operator does not have a clear view, a signaller who has been instructed in a code of signals for managing traffic in the workplace must be used.
- Loads must be carried as close to the ground or floor as the situation permits.
- Loads that may tip or fall and endanger a worker must be secured.
- Where a lift truck is required to enter or exit a vehicle to load or unload, that vehicle must be immobilized and secured against accidental movement.
- A lift truck must not be used to support, raise or lower a worker on a construction site and must only be so used in an industrial establishment if the work is carried out in accordance with Regulation 851(Section 52).
- Barriers, warning signs, designated walkways or other safeguards must be provided where pedestrians are exposed to the risk of collision.

## COMMUNICATION

Any of the following method(s) may be used to communicate this policy:

- Company email
- Company memo
- Posting of policies and procedures
- Training
- Meetings and Safety talks

## TRAINING

The Company will ensure that all employees who operate a Lift Truck for work are trained and educated general hazards, legal requirements, safe operating procedures and that they are clear about their roles and responsibilities as well as this policy and its procedures.

Operators will be trained (prior to authorization to operate lift truck) in:

- Hazards
- Pre-use inspections
- Safe operating procedures
- WHMIS, emergency procedures (as necessary)
- Refueling/recharging

Specifics of operator training will include (but not limited to):

- Mounting and dismounting of truck
- Start-up
- Travelling with and without a load
- Pedestrian safety
- Load handling
- Load selection and security
- Load pickup and placement
- Stacking/de-stacking
- Handling specific to docks, trucks
- Driving on ramps and grades
- Shut down and parking.

The evaluation will include a written test and also a practical skills evaluation. The evaluation will address specific work tasks and will include the training specifics. The evaluation results will be filed with HR

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Operators will be retrained every 3 years and practical skills evaluations will be conducted by supervisors every 18 months in accordance with the Canadian Standards Association (CSA) standard (the purpose of this evaluation will be to provide feedback for immediate correction/action and information/direction for future training).

An authorized person's record of training document will be dated and signed to reflect training. Documentation of training completed will be filed electronically and in the employee file with HR.

## **EVALUATION**

Human Resources collaborate with the Joint Health and Safety Committee, to evaluate the success of the program by reviewing:

- Supervisor and JHSC inspections and reports
- Accident and incident data

## **EXHIBITS/FORMS**

- F217.1a – Daily Pre-shift Operator Checklist – Electric Lift Truck
- F217.1b – Daily Pre-shift Operator Checklist - Propane, Gas, Diesel Lift Truck
- F217.2 - SWP – Forklift Safe Operation
- F217.3 – SWP – Safe Handling of Propane
- F217.4 – SWP – Mounting and Dismounting Units: 3 Points of Contact
- F217.5 – SWP – Charging Forklift Battery (English)
- F217.6 – SWP – Charging Forklift Battery (French)
- F217.7 – SWP – Loading and Unloading Trucks

## **ADDITIONAL REFERENCES**

- Regulations for Industrial Establishments: Sections 51, 52, 57, 58, and 59*
- Ministry of Labor Guideline for the Safe Operation and Maintenance of Powered Lift Trucks.
- CSA Standard B335-04: Safety Standard for Lift Trucks*

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## **Policy & Procedure: P218**

### **Subject: Power Operated Equipment**

#### **PURPOSE**

To ensure all employees are using power operated machinery and tools properly and to minimize the number of injuries or hazards in the workplace.

#### **SCOPE**

This policy is applicable to all employees of the "Company" (FST Canada Inc.) and includes Company owned, employee supplied, and rental equipment.

#### **POLICY**

The use of power operated equipment requires training, precision, and care on the part of the operator. Knowledge of the equipment or tool, and an understanding of the job to be done, is imperative if the task assigned is to be conducted efficiently and safely.

Power tools can be hazardous when improperly used. There are several types of power tools that are based on the power source they use: electric, pneumatic, liquid fuel, hydraulic, and power actuated.

No employee shall operate any equipment unless training has been provided and the Manager has determined that the employee is competent to operate that specific equipment. If an employee is instructed to operate the equipment, but has not received training, the employee is required to report it to their manager.

Operating manuals and instructions shall be made available and reviewed when equipment is being put into operation. CSA approved electrical equipment, and tools only shall be used.

Maintenance procedures specified by the manufacturer shall be followed and records shall be kept.

All exposed moving parts and pinch points shall be guarded to prevent access to the moving part. Guards shall be kept in place and maintained in good working order.

Loose clothing or jewelry shall not be worn near any rotating shaft, spindle, gear, belt, or other source of entanglement.

Appropriate personal protective equipment shall be worn when working on or around power operated equipment. Signs to this effect shall be posted.

#### **INSPECTION**

All belts, gears and pulleys, plugs and wiring shall be inspected prior to each use for signs of wear or fatigue which could cause mechanical failure of the equipment. All lifting devices shall be maintained in accordance with applicable regulations.

Any circuit or piece of equipment shall be positively identified and carefully tagged and locked out (using the proper lock out procedures) prior to attempting any repairs, intrusive maintenance, lubrication or set-up.

All portable electric tools that are damaged shall be removed from the use and tagged "DO NOT USE".

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**PRECAUTIONS**

- Never carry a tool by the cord or hose.
- Never yank the cord or the hose to disconnect a tool from the receptacle.
- Keep cords and hoses away from heat, oil and sharp edges.
- Disconnect tools when not in use, before servicing, and when changing accessories such as blades, bits and cutters.
- All observers should be kept at a safe distance away from the work area.
- Secure work with clamps or vice, freeing both hands to operate the tool.
- Avoid accidental starts by ensuring the power source is disconnected before carrying the tool. When this is not feasible, the worker should not hold a finger on the switch button while carrying a plugged-in tool.
- Be sure to keep good footing and maintain good balance.

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## **Policy & Procedure: P219**

### **Subject: Machine Guarding**

#### **PURPOSE**

To ensure safe and appropriate machine guarding is in place on all machinery and power equipment in order to protect workers from injury or incident.

#### **SCOPE**

This policy is applicable to all employees of the “Company” (FST Canada Inc.) who are required to use and operate equipment requiring guarding.

#### **POLICY**

Guarding on machinery is to prevent injury to a worker from reckless discharge of material or product from a machine. No worker shall operate machinery unless instruction has been provided, and the worker is familiar with all rules and safeguards pertaining to the safe and effective operation of the machine or equipment. Guarding is for worker’s protection - they must be in place before starting the machine. It is a serious infraction of legislation and Company Policy to operate any unguarded equipment or to make ineffective any guard or safety device.

Although machine guards are almost as varied as machines themselves, the essentials of machine guarding are quite simple. A well-guarded machine protects the worker from possible contact with any moving part during the entire process or operation. Well-guarded machines are also protected from unexpected hazards such as broken parts, unexpected start-up after outages, or even worker slips and falls on to the machinery.

The best machine guards are built into machines designed with the necessary safety features in mind, and where no additional guarding is required. However, some workplace machinery may require some additional guarding depending on the work performed.

It is the responsibility of all employees to immediately report any inefficient, missing or broken guarding on a machine or piece of power equipment to their supervisor.

#### **GUARDING**

Operating procedures and controls, work rests, protective shields, hoods and interlocking devices are all forms of machine guarding. Guarding is required when:

- Any prime mover or machine transmission equipment has any exposed moving parts, they shall be guarded in a manner that prevents access to the moving part
- There is an exposed “in-running nip hazard” or other part of machine or device that may endanger a worker, preventing access to the pinch point

Machine guards should be considered a permanent part of the machine or equipment, and should be designed to protect the operator, maintenance Workers and even Workers just passing by. Machine guards should be strong enough to resist normal wear and tear, durable enough to require little maintenance, and easy to repair if necessary.

Guards should not interfere with the efficient operation of the machine, cause discomfort to the operator, or complicate cleaning, oiling or normal daily maintenance. Nor should machine guards create additional hazards, such as pinch points, rough edges, sharp corners, or splinters.

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## **Policy & Procedure: P220**

### **Subject: Lock Out/ Tag Out**

#### **PURPOSE**

The purpose of this procedure is to establish the standards required for the lockout/tagout (LOTO) of hazardous energy isolating devices.

#### **SCOPE**

This policy is applicable to all employees of “the Company”, (FST Canada Inc.). Appropriate employees shall receive specific instruction in the safety and significance of the lockout/tagout policy and procedure. Only those personnel described by name and/or title on last page of this program are authorized to lockout/tagout machinery and equipment.

All new employees and employees transferred into operations or employees who are or may be in the area of the service/maintenance work being performed on their machine(s) shall be instructed in the purpose and use of the lockout/tagout procedure. Employees will be re-trained as indicated by OH&S’s lockout/tagout standard.

The Department Supervisor and the Manager shall be responsible for the implementation, compliance and annual review of this policy/procedure.

#### **POLICY**

This policy shall be used to ensure that the machinery or equipment is isolated from all potentially hazardous energy and locked out and tagged out before employees perform any servicing or maintenance activities on any machine or equipment where the unexpected energization, start-up or release of stored energy could cause injury to the employee(s) performing the service or maintenance or damage to machine, equipment or property. “Lockout” involves more than merely disconnecting or locking out a power source. All machines or equipment capable of being energized or activated electrically, pneumatically, air, gravity or hydraulically must be de-energized or de-activated by physically disconnecting or otherwise making the apparatus inoperable prior to any maintenance or repair work performed on it. This is often referred to as zero energy, or zero mechanical state.

The Company will ensure that all appropriate employees who work with or are or may be in the area of an energized source when work is being performed on machinery or equipment is informed of the hazards associated, is trained in the Lockout/Tagout policy and procedure and adheres to this standard.

#### **DEFINITIONS**

**The “Company”** – FST Canada Inc., operating as various business entities.

**Equipment** – Includes but is not limited to machinery, devices, stationary tools, vessels, pipes, tanks, and vehicles.

**Energy source** – Includes but is not limited to electrical, pneumatic, hydraulic, chemical, gravity, thermal, steam, tension, momentum, spring pressure, head pressure and line pressure (fluid/gas).

**LOTO** – is an acronym that stands for Lock Out/Tag Out

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**Lockout** – Means disengaging all energy sources from equipment, safely releasing stored energy or materials, and securing the control device(s) in the "off" position with an approved lock, thereby rendering it incapable of operation, release or movement.

**Tagout** – Means an approved/durable label that is made of non-conductive material, which provides information about the purpose of locking the equipment out, and particulars such as whose lock it is and the date/time.

**Control Device** – Means a device that physically isolates equipment from its energy source, and can be secured, locked or isolated in the "off" or closed position (e.g. keyed locks, lockout bars, braces, line blanks, line caps, electrical disconnect switches, programmable logic controllers, blocks).

## RESPONSIBILITY

### Employer will:

- Establish a process for evaluating work operations, machinery and equipment to determine where lockout/tagout procedures, devices and training are needed
- Develop and maintain a written lockout/tagout program that includes a lockout system
- Develop and maintain specific lockout/tagout-related safe working procedures, where necessary, in compliance with occupational health and safety legislation, this policy and associated guidelines
- Ensure all existing equipment and machinery has the capability for lockout, de-energizing or isolation from all sources of energy, including stored energy or materials
- Provide and maintain necessary equipment to enable lockout/tagout of equipment or machinery, where necessary
- Ensure that new equipment or machinery is designed and installed in a manner that provides the capability for lockout, de-energizing or isolation from all sources of energy, including stored energy or materials
- Provide general and specific training to workers who work on machinery or equipment under conditions requiring lockout/tagout provisions
- Ensure that work is performed in compliance with the Occupational Health and Safety Act and applicable regulations and industry standards

### Supervisor will:

- Be familiar with all aspects of the lockout/tagout program
- Evaluate work operations, machinery and equipment to determine where lockout/tagout procedures, devices and training are needed
- Ensure that the requirements of the program and related elements of the Occupational Health and Safety Act and regulations, and applicable industry standards, are applied at all times
- Ensure that all employees under their supervision who work on machinery or equipment are competent to do assigned work, are provided with written instructions and training (where required), and are authorized to perform the lockout procedure
- Conduct appropriate inspections to ensure procedures are followed and, when violations are found, take appropriate action
- Maintain a record or training and a list of equipment or locations with specific lockout/tagout procedures

### Workers will:

- Attend lockout/tagout training and apply knowledge acquired through training in the performance of their work
- Acquire permission to work on equipment that requires a lockout
- Use lockout/tagout devices provided as specified in the procedures

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## PROCEDURE

Control switches, power sources, computer-controlled sources, robotics or other such devices must be personally **locked out and tagged** by an authorized worker and Manager/Supervisor who are involved in the operation or repair.

The initial lock will be placed on by the Supervisor/Manager, Foreman or acting body of authority. This Supervisor, Manager, Foreman or acting body of authority shall only remove the lock after all work is completed and an inspection has been conducted to ensure that all Workers are clear of any danger.

### ***Each employee must:***

- Use his or her personal lockout/tagout device
- Install his or her personal device only
- Remove his or her personal device only
- Never exchange devices with others
- Each worker's lock must have a tag attached with the following information:
  - a) Worker's name
  - b) Home and work phone number
  - c) Date and time of lockout
- Each worker must retain his or her key while the lock is in place. Only the worker in charge of the lock should have a key.

It is the responsibility of the Supervisor running the shift transition meeting to ensure the next shift is aware of the active Lockout/Tagout(s) that are currently in place.

In any of the following steps, if more than one individual is required to work on the machine or equipment being repaired, this will require more than one lockout or tagout device. Each person shall place his/her own personal lockout/tagout devices on the energy isolating device.

Multiple lockout/tagout devices are to be used where the energy, isolating device has provisions for more than a single lockout/tagout device.

All company employees must be aware of our prescribed Lockout/Tagout program in order to prevent accidental or inadvertent energization or operation of locked/tagged machines or equipment.

Employees will not attempt to operate any switch{s}, valve{s} or other isolating devices where it is locked/tagged out.

The following steps outline the application and use of lockout/tagout procedures and will apply to all employees involved in the repair and maintenance of machinery or equipment, and must be followed at all times without exception:

### **STEP 1: Identify Energy Sources**

Identify all energy sources affecting the equipment or machinery. An inventory/survey of all forms of hazardous energy sources must be made to identify various energy forms to determine which switch(s) 1 valve(s) or other energy isolating devices apply to the machinery or equipment that is to be locked out/tagged out. More than one energy source may be involved. The most common forms of energy sources are:

- Electrical
- Pneumatic
- Hydraulic
- Mechanical
- Fluids, gases and chemicals
- Gravity

### **STEP 2: Parts to Be Locked Out or Isolated**

Identify systems that affect, or are affected by, the work being performed. These may include primary, secondary, backup, or emergency systems and interlocked remote equipment.

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Review the current system for remote energy sources and confirm the existence and location of any switches, power sources, controls, interlocks, or other devices necessary to isolate the system.

Remember that equipment may also be affected by:

- Time restrictions for completing the work
- Time-activated devices

### **STEP 3: Notify All Affected Employees**

All affected employees must be notified that a lockout/tagout is going to be utilized and the reason. The person authorized to implement the lockout/tagout shall know the type(s) and magnitude(s) of energy that the machine or equipment utilizes and shall understand the hazards. Employees shall request assistance if they are not aware of all energy sources of a machine(s) and all lockout procedures.

### **STEP 4: Shut Down Equipment and Machinery**

Authorized personnel must shut down the equipment, machinery, or other system components, placing them in a zero-energy state. Trace all systems to locate and lock out energy sources.

To isolate or block energy, take the following steps:

#### Electrical

- De-energize electrical circuits by disconnecting the power source from the circuit.
- Unplug machine, use plug lockout or use a disconnect switch with padlock, lockouts and tags.
- Bleed off stored electrical energy to zero state.
- Use a tester to ensure that all circuits are dead.
- Lock and tagout all power sources.

#### Pneumatic

- Release pressure to zero energy state.
- Use shut off valves, energy isolation valves, padlocks, lockouts and tags to lockout energy source.

#### Hydraulic

- Release pressure to zero energy state.
- Use shut off valves, energy isolation valves, padlocks, lockouts and tags to lockout energy state.

#### Mechanical

- Disconnect or shut down engines or motors that power mechanical systems.
- Release and/or block all stored mechanical energy
- Be aware of gravity, springs, tension and other sources of energy that are not always obvious.
- Use blocks to restrain energy.
- Use padlocks, lockouts, tags to lock and tagout mechanical energy.

#### Fluids, gases and chemicals

- Block fluid (gas, liquid, or vapor) flow in hydraulic, pneumatic, or steam systems by using control valves or by capping or blanking the lines.
- Recognize all hazards.
- Insert a blank or blind in the line.
- Use valve lockouts, padlocks, lockouts and tags at isolating source.

#### Gravity

- Block machine parts against motion that might result from gravity (falling).

Some forms of energy must also be dissipated after a system has been de-energized. System components such as electrical capacitors, hydraulic accumulators, or air reservoirs may retain sufficient energy to cause serious injury or death— even though the component has been de-energized, isolated, or blocked from the system and locked out.

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**STEP 5: Tagging**

Regulation requires each worker involved in a lockout operation to attach a durable tag to his or her personal lock. The tag must identify the worker's name, the worker's employer, the date and time of lockout, the work area involved, and the reason for the lockout.

A tag in itself offers no guarantee that a machine or system is locked out. It simply provides information.

**STEP 6: Restoration of Machines or Equipment to Normal Operations:**

Upon completion of repair or maintenance ensure all tools have been removed, guards have been re-installed, and Supervisor or Manager have checked the area around the machine or equipment to ensure that no one is exposed to the operating parts of the machine or equipment. The Supervisor or Manager will verify if the equipment is back to full and safe operation by cautiously starting the equipment and look for any movement or functions issues or irregularities.

- If none are observed, the worker and Supervisor/Manager will agree that the equipment is safe.
- Remove all lockout and/or tagout devices.
- Re-engage all energy isolating devices to restore energy to the machine or equipment.
- Re-start the equipment back to regular safe function.

The person removing the last lockout device should inform all affected personnel, especially the affected machine operator{s} that lockout has been removed and the machine is operable.

Records of lock outs and verification of the repair or maintenance must be written and kept in the Maintenance Logbook

**EXHIBITS:**

Lockout Tagout Form

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## **Policy & Procedure: P221**

### **Subject: Motor Vehicle Accidents and Safe Driving**

#### **PURPOSE**

To ensure all employees of take precautions to ensure their safety and the public while operating a motor vehicle and follows the appropriate procedures when a motor vehicle accident occurs.

#### **SCOPE**

This policy is applicable to all employees of the “Company”, (FST Canada Inc.).

#### **POLICY**

It is a requirement in certain positions at the Company that employees drive a company vehicle. Those employees must be at least 18 years of age and show a current, valid Driver’s License for the applicable classification. A Driver’s abstract check is conducted prior to hiring and at the discretion of the company during the staff’s employment. Before any company vehicle can be driven by an employee, that employee must have a driving record acceptable to the company vehicle insurance carrier.

**Those insured by the Company may undergo driver safety training throughout the course of their employment.**

Employees who are given authorization to drive owned vehicles are responsible to keep the vehicle clean, both inside and out. Company vehicles are a reflection of the Company itself, and, in some instances, act as a billboard for our business. Therefore, it is the responsibility of all employees who are given authorization to drive a company vehicle to drive responsibly and maintain the vehicle at a high company standard of cleanliness, both internally and externally.

Personal use of the Company-owned vehicle shall be limited. Any personal use of Company vehicles shall be cleared with their Manager first and the employee shall use and pay for their own fuel for any personal use. No weekend, vacation trips or travels of long duration shall be made in a company-owned vehicle unless first approved by management.

**Unauthorized use of company vehicles will be considered theft and grounds for immediate termination of employment and/or criminal charges.**

#### **MAINTENANCE**

In an effort to ensure all company owned vehicles are operating safely and maintained properly, all employees operating company vehicles must check the oil level at each fill up. An oil or fluid leak can happen at any time and preventative maintenance services cannot solely identify all problems.

In addition, all shop/parts vehicles have daily vehicle check report (VCR) books that must be completed by the first operator of the day. That person is responsible to hand in the previous day’s VCR. The engine oil and all other levels **must** be checked as part of the VCR completion. Every operator thereafter for that day will check to make sure the VCR was done for that particular day. If an operator notices a problem with the vehicle, that operator must record it on the VCR report and report it to their manager.

This will enable the service department to identify and to decide if additional repairs are required prior to the next PM servicing. If the repair is significant enough, and poses a safety concern, the vehicle will be taken out of service.

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All shared vehicles will be returned to the yard and parked with fuel. A combined effort by all employees on this matter will keep our vehicles operating as reliably and as safely as possible.

## **VIOLATIONS**

Company vehicles must be driven with care, caution, and all traffic laws must be observed. Evidence of careless, reckless driving, and/or speeding is basis for termination of employment.

Any employee who receives a traffic violation, (speeding, parking, etc.), while operating a Company owned vehicle, must report it to their supervisor immediately. DO NOT attempt to pay the ticket without first consulting your manager. Once the company has determined how to proceed with the violation, any/all fines or court costs will be paid by the employee and will not be reimbursed by the Company.

If an employee loses their license, their driving privileges and possibly their employment with the Company will be terminated. Employees have a duty to inform their manager immediately after having their license revoked or suspended.

In the case of an employee charged and/or convicted with DWI/DUI prior to and/or after date of hire, the employee must be cleared through the company's Insurance Carrier. This may limit the person's driving privileges, require other restrictions or prevent further employment should the employee's driving need be of primary importance to fulfilling their job description and responsibilities.

## **DISTRACTED DRIVING**

It is prohibited to use a Blackberry, iPhone etc. or other type of phone for calls, texting or other means of communication while driving a Company vehicle, unless a hands-free device is used. Manage cell phone distractions by making your calls before you start driving, take a break to return your calls, and let your voicemail take your messages for you while you pay attention to the road.

The following are common distractions and should be avoided while driving a Company vehicle:

- Eating/drinking
- Changing Music
- Applying makeup or personal grooming

## **PRECAUTIONS:**

- When you feel drowsy behind the wheel, pull over somewhere safe and get some rest
- Do not drink and drive
- Keep a safe distance between you and the vehicle in front of you
- When driving near a pedestrian area, slow down, look for pedestrians and, only then, proceed with caution. Reminder: PEDESTRIANS DO HAVE THE RIGHT OF WAY
- While on Company premises:
  - All employees and visitors must drive under the speed limit of 10 km in the yard including when entering the facility ground from the road, and entering the roadway from our facility grounds
  - No employee shall pass another moving vehicle in the parking lot or yard
  - When mobile equipment, such as a forklift, appears to be crossing near your driving path, please stop and wait for the employee to wave you through and then proceed with caution

## **ACCIDENTS**

In the event of a Motor Vehicle Accident, the following procedure should be followed:

- 1) If possible, relocate yourself to a safe place, out of the way of traffic – do not get out of the vehicle if the accident occurred on a high traffic highway
- 2) Call 911 if there are injuries to the driver or anyone else involved in the accident
- 3) Examine the company vehicle and document all damages using the Accident Report form
- 4) Use the camera feature on blackberry to take pictures of all damages to the company vehicle
- 5) Do not discuss the accident with anyone at the scene other than police or paramedics

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- 6) Notify the insurance company of the accident by calling the phone number on the insurance documentation in the glove box
- 7) Notify your manager and/or HR about the accident as soon as possible and no later than 12 hours after the accident has occurred
- 8) Ensure all repairs required due to the accident are pre-approved by your manager

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## **Policy & Procedure: P222**

### **Subject: Ventilation Exhaust Systems**

#### **PURPOSE**

To ensure all employees work in a safe environment free from hazardous fumes.

#### **SCOPE**

This policy is applicable to all employees of the “Company” (FST Canada Inc.).

#### **POLICY**

To control the concentration level and prevent exposure to airborne hazardous substances, proper ventilation system must be adequate for all areas of the workplace.

**Ventilation Systems** shall be constructed, installed, operated and maintained to:

- Meet all legislative requirements
- Provide proper ventilation to minimize exposure to hazardous substances and cold viruses to maintain a healthy work environment

**Shop Exhaust Systems** will consist of the following:

- Portable units will consist of a flexible hose, fitter, and exhaust fan
- Permanent units will be built into the ventilation system
- Where the flexible hose reel is required, it must have the proper diameter to cover the exhaust pipes; free from any rips, burns or holes where fumes can escape indoors; meet temperature requirements to avoid replacements and burning; and is long enough to exist out of the building or up into the permanent and engineered suitable ventilation system



## Policy & Procedure: P223

### Subject: Mezzanine Safety

#### PURPOSE

To ensure that all employees are informed and adhere to the procedures required when using the parts and storage mezzanines at applicable branches.

#### SCOPE

This policy is applicable to all employees of the “Company” (FST Canada Inc.), who use a mezzanine for parts and storage.

#### POLICY

The mezzanine safety gate must be left open only when items are being loaded or unloaded from the mezzanine. It must be closed at all other times and must not be blocked by boxes or other items.

No boxes or objects may lean against or hang over the railings of the mezzanine.

Under no circumstances should any boxes or items be dropped from the mezzanine down to the floor or to a person.

Employees must report any compromise/deficiency in the shelving unit immediately to a member of the JHSC/ Branch H&S Representative.

For mezzanines without shelving, the maximum load capacity (MLC) must be posted in an accessible place. The total weight on the mezzanine must not exceed the MLC at any given time. Items must be weighed and the current weight on the mezzanine must be recorded at all times.

#### STORAGE

All items stored on mezzanines must be pre-approved by the Parts Manager or designate. If there is shelving on the mezzanine, each shelf on the mezzanine must be labeled with its maximum load capacity. Before storing goods on the mezzanine shelves, the weight of the goods must first be determined.

- Every box/item must have its weight visibly written on it.
- Determine which shelf can accommodate the goods without exceeding the maximum load capacity by verifying with the shelf label.
- If there is more than one box on a shelf, the weight of all boxes must be calculated to ensure that the combined weight does not exceed the load capacity for that shelf.
- Heavier boxes must be stored on the lower shelves. Re-organization of the previous goods stored may be required to comply with this policy.
- Any boxes stored above shoulder height must be removed from the shelving unit using a ladder.

To determine the maximum load capacity for mezzanine floor = MLC (found on engineering documents for the mezzanine), complete the following calculation:

- Length of shelving x Width of Shelving = Square footage
- Square Footage x MLC = Maximum allowable lbs. per sq. ft. for the entire shelving unit
- Maximum allowable lbs. per sq. ft. for the entire shelving unit / # of shelves = Maximum load per shelf

For assistance calculating load capacities, contact a member of the JHSC/Branch H&S Representative.

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## **Policy & Procedure: P224**

### **Subject: Housekeeping and Storage**

#### **PURPOSE**

To ensure all employees participate in maintaining a clean, organized and unobstructed work environment in order to prevent workplace injuries and illnesses.

#### **SCOPE**

This policy is applicable to all employees of the “Company” (FST Canada Inc.).

#### **POLICY**

All employees share the responsibility for following the established housekeeping procedures. Supervisors and the JHSC will be responsible to monitor housekeeping as part of their facility safety inspection procedures. Management has the additional responsibility to provide disciplinary action when necessary to reinforce compliance.

#### **Floors:**

- Clear and unobstructed
- Adequate aisles and walkways
- Free of loose materials, debris, spills or worn carpeting

#### **Offices and Work Areas:**

- Office areas are to be kept neat and orderly
- All aisles, emergency exits, fire extinguishers, first aid supplies and eyewash stations etc. must be kept clear of product material storage (temporary and permanent) at all times
- Storage areas will be maintained orderly at all times
- Keep file and desk drawers closed when not in use.
- At the end of the business day, turn off all office equipment (area heaters, lamps, coffee maker, PC’s, etc.) and lights to save energy and prevent fires.
- All leaks will be reported to supervision and maintenance for immediate repair and clean up

#### **Rest rooms, Locker Rooms and Lunchrooms:**

- Employees are expected to clean up after themselves
- Flammable materials may not be stored in lockers

#### **Spills:**

- Spills must be cleaned up immediately to avoid slips
- All environmentally hazardous spills must be dealt with in accordance with the Chemical Spill Policy

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## Policy & Procedure: P225

### Subject: Underground and Overhead Utilities

#### PURPOSE

To protect workers in situations where the worker may be exposed to high voltages due to unseen underground utilities or close proximity to overhead utilities.

#### SCOPE

This policy is applicable to all employees of the “Company” (FST Canada Inc.).

#### POLICY

Working near electrical hazards is dangerous and can be fatal. A major cause of accidents involving electricity comes from the failure to identify the hazards associated with live electrical equipment and wiring. Incidental power line contact happens too often, especially considering the potential severity of the consequences. Workers must be aware of electrical hazards when operating equipment near an energized overhead electrical conductor, or when excavating equipment will be operated near underground power lines.

#### PROCEDURES

##### Underground Utilities:

Contacting buried cable as a result of excavating prior to facilitating a locate (getting a location) of the service, can be fatal. To ensure that workers are not exposed to underground utilities, absolutely no digging or hydro-excavation will be permitted without a documented and clearly marked locate from the local utility authority – **See Appendix A**. If the locate proves that utilities exist in the proposed dig site, the work must be moved to a safe location that has been deemed to not have any underground utilities.

If work must be performed in the area of underground utilities, the worker must have proper training on Electrical Safety – Hydro-vac Operators from the Infrastructure Health & Safety Association or an approved alternate training provider.

##### Overhead Utilities:

Prior to commencing work on, operating, demonstrating or testing any equipment, a site assessment must be conducted to determine that no overhead wires are present. If there are overhead wires present, the worker must confirm that the equipment is not within reach and could not possibly encroach on the minimum permitted distances from live overhead power lines. After review of all provincial/state legislative requirements, the **Company has established that the minimum permitted distance is 6 metres (19’8”)**.

If overhead wires are present that may be contacted while operating or testing the unit, the unit must be moved to a safe location.

#### EMERGENCY RESPONSE

In the event of contact between equipment and overhead power lines:

1. **Stay on equipment.** Don’t touch equipment and the ground at the same time. Touching anything in contact with the ground can be fatal. Stay on the equipment unless forced off because of a life-threatening hazard such as fire.
2. **Keep others away.** Warn everyone not to touch the equipment or its load. That includes buckets, outriggers, load lines, and any other part of the machine. Beware of time-delayed relays. After line

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damage trips a breaker, relays may still try to restore power. They may reset automatically two or three times.

3. **Break contact.** If possible, break contact by moving the equipment clear of the wires. This may not be feasible where contact has welded conductors to equipment, the hoist line, or the load.
4. **Call 911.**
5. **Call the local utility.** Get someone to call the local electrical utility for help. Stay on the equipment until the utility shuts down the line and *confirms* that power is off.
6. **Jump clear.** If forced to leave the equipment, jump carefully *off* the equipment onto the ground landing only on your feet, with your feet together. **Touching the equipment and the ground at the same time can be fatal.** Touching the ground at different points can also be fatal. Shuffle slowly away from the equipment using very small steps to minimize the contact area with the ground.
7. **Report the contact.**

## REPORTING

All accidents, regardless of severity, must be reported promptly to the immediate Supervisor who will complete the Occupational Injury/Illness report. The completed form will be forwarded to the

Report incidents of power line contact to the Utility Authority so they can check for damage that could cause the line to fail later.

**Any serious electrical incident must be reported to the Inspection Department of the ESA within 48 hours after the occurrence.**

**“Serious electrical incident”** means:

- any electrical contact which causes death or critical injury to a person
- any fire or any explosion or any condition suspected of being electrical in origin which might have caused a fire, explosion, loss of life, critical injury to a person, or damage to property
- any electrical contact with electrical equipment operating at over 750 volts
- any explosion or fire of electrical equipment operating at over 750 volts

**“Critically injured”** means an injury of a serious nature that,

- places life in jeopardy
- produces unconsciousness
- results in substantial loss of blood
- involves the fracture of a leg or arm but not a finger or toe
- involves the amputation of a leg, arm, hand, or foot but not a finger or toe
- consists of burns to a major portion of the body
- causes the loss of sight in an eye

## INVESTIGATIONS

The JHSC/Branch Representatives, Supervisors and Workers will collaboratively conduct a thorough investigation. Care should be taken not to disturb the scene, nor should equipment or tools involved in the accident be removed.

### One Call Locate Services

#### Canada

Alberta	1-800-242-3447	<a href="http://www.alberta1call.com">www.alberta1call.com</a>
Manitoba	1-204-777-6590	<a href="http://www.mb1call.com">www.mb1call.com</a>
Ontario	1-800-400-2255	<a href="http://www.on1call.com">www.on1call.com</a>
Quebec	1-800-663-9228	<a href="http://www.info-ex.com">www.info-ex.com</a>
Nova Scotia	1-800-428-6230	<a href="http://www.nspower.ca">www.nspower.ca</a>

#### United States

All States	811	<a href="http://www.call811.com">www.call811.com</a>
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## Policy & Procedure: P226

### Subject: Workplace Inspections Policy and Procedure

#### PURPOSE

The purpose of this policy is to enable the “Company” (FST Canada) to continuously improve the general health and safety conditions of the workplace and its equipment, processes, procedures, buildings and materials. The Workplace Inspection Policy and Procedure provides a format for ensuring that workplace inspections are conducted in a proactive and consistent manner and once hazards have been identified that steps are taken to minimize or eliminate the hazard.

#### SCOPE

This policy is applicable to all employees of the Company.

#### POLICY

The Company is committed to ensuring that regular Workplace Inspections are performed as they are a proactive means of recognizing hazards before they result in an illness, injury or property damage and for recommending improvements to eliminate or minimize those hazards.

All workplace parties shall be vigilant and shall exercise appropriate diligence to minimize or eliminate risks in the workplace.

The physical condition of the workplace will be inspected at least annually and at least part of the workplace will be inspected monthly. Planned Workplace Inspections must be completed by members of the Joint Health and Safety Committee (JHSC) or by the Health and Safety Representatives from each branch or facility.

Inspections must be completed by at least one worker health and safety representative and one management health and safety representative. Planned Workplace Inspections are to be completed using the Workplace Inspection Form **F226.1 Workplace Inspection Form**.

All completed Workplace Inspections are to be reviewed by the JHSC or Health & Safety Representatives. The Senior Branch Manager must also review and sign the Workplace Inspection report and take the necessary corrective actions to eliminate or control the recognized hazards.

#### DEFINITIONS

**The “Company”** - FST Canada Inc., operating as various business entities.

**Workplace Inspection** – involves scheduled monthly inspections of the workplace as prescribed by legislation and regulation to recognize, assess, control and evaluate hazards in the workplace. Inspections will involve management, workers, JHSC member and health and safety representatives.

**Pre-Shift Inspection** – involves inspecting any equipment, tools, and Personal Protective Equipment (PPE) prior to commencing work and completing the required inspection documentation.

**Hazard** – any source of potential damage, harm or adverse health effects on something or someone under certain conditions at work.

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

**Workplace Hazards** - include:

- Safety Hazards: inadequate machine guarding, unsafe workplace conditions, unsafe work practices
- Biological Hazards: viruses, bacteria, fungi, parasites
- Chemical Hazards : liquid, vapours, fumes, dust, gas, etc.
- Ergonomic Hazards: repetitive and/or forceful movements, temperature extremes, improperly designed workstation
- Physical Hazards: noise, vibration, energy, water, electricity, radiation, pressure

**Frequency of Exposure** – indicated the number of exposure events during an exposure time period

**Probability of Occurrence** - indicates how likely it is that the hazard will cause injury, illness and/or property damage

**Severity** – indicates how serious an injury, illness or property damage could be

*OH&S Act and WSI Act*

## **ROLES AND RESPONSIBILITIES**

The following responsibilities apply:

**Employer will:**

- Provide adequate time for the JHSC and Health and Safety Representatives to complete the monthly Workplace Inspections and will ensure this time is paid
- Take all necessary precautions and actions reasonable to prevent, eliminate or minimize hazards in the workplace
- Provide the designated representative with the required information and assistance they may require for the purpose of carrying out an inspection of the workplace.
- Ensure all inspection reports are reviewed by senior management and that hazards identified are corrected and controlled

**Senior Manager will:**

- Review the findings identified during the Workplace Inspection
- Participate in the development of an action plan to address the findings
- Ensure corrective action is taken to address hazards identified
- Sign and acknowledge review of workplace inspection report

**Manager/Supervisors will:**

- Conduct planned and unplanned workplace inspections (as required, but at least monthly) and ensure corrective action is taken to address any hazards identified. Make available documentation of planned and unplanned workplace inspections in accordance with this policy.
- Cooperate with any persons performing a workplace inspection.
- Where possible, participate in the Health and Safety Representative/Joint Health and Safety Committee (H&S Rep./JHSC) inspection process.
- Review and ensure all items identified on the Workplace Inspection Report are addressed in a timely manner by initiating the appropriate correction action.
- Discuss the results of the inspections and the corrective actions taken with employees
- Ensure that employees have completed pre-use inspections in accordance with designated departmental written procedures

**Employees (Workers) will:**

- Report any hazards or unsafe working conditions to their Manager/Supervisor or member of the JHSC or Health and Safety Representative

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- Cooperate with any persons performing a workplace inspection
- Conduct pre-shift equipment inspections of equipment prior to the start of a shift or prior to work commencing on equipment. Verification of this process is audited during the Workplace Inspection

**Joint Health and Safety Committee (JHSC)/Health and Safety Members will:**

- Will ensure that at least one worker member and one management member is certified as required by legislation
- Review previous month’s Workplace Inspection to identify any outstanding action items
- Conduct the Workplace Inspections as per the schedule (monthly)
- Prepare an inspection report identifying any hazard or unsafe acts/conditions observed during the inspection
- Make recommendations to the employer for workplace improvements to protect employee health and safety
- Participate in the resolution process for unresolved safety issues

**Human Resources will:**

- Provide Workplace Inspection and hazard identification training to JHSC members and Health and Safety Representatives
- Create the Workplace Inspection tools and evaluate those tools at least annually or as required
- Review the completed monthly Workplace Inspection forms from each branch facility
- Act as a resource for JHSC members and Health and Safety Representatives and respond to any questions or concerns regarding the Workplace Inspections process

**PROCEDURE**

There are several other types of workplace inspections that should be conducted in conjunction with the scheduled monthly workplace inspections. These may include any of the following:

- Pre-use inspections
- Daily workplace inspections
- Spot inspections
- Job observations by Managers or Supervisors
- Job hazard assessments

While conducting the workplace inspections, the Inspector should adhere to the safety procedures and PPE posted for that area and ensure that their presence is known by other employees in those areas.

**Workplace Inspection:**

- Walk around the area under inspection; check the working environment and equipment
  - Inspect areas subject to repeated injuries or health/illness complaints
  - Check to see that problems identified during the last inspection have been resolved
  - Make sure all postings required by the *OH&S Act* and *WSI Act* are posted and current.
  - Observe and record employee activities; ensure that employees are operating and maintaining equipment according to the manufacture’s instructions, safety training and work instructions
  - Obtain and record input from department workers and supervisors (if applicable) on hazards and potential risks
  - Watch for hazards such as wet floors, unguarded equipment, chemical odours, unusual noises, etc.
  - Note any new hazards, undesirable housekeeping, poor job practices, or any other unsatisfactory or substandard conditions; record observations and finding
- All identified hazards must be eliminated or controlled immediately. If this is not possible, interim control measures must be implemented immediately until further action can be taken
  - Warning signs must be posted at the location of a hazard
  - All affected employees should be notified of the location of the hazard and the interim controls

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- Report the findings on the Workplace Inspection Form
  - Describe the hazards, including locations in the workplace
  - Assess identified hazards based on Frequency of Exposure, Probability of Occurrence, and Severity
  - Rate identified hazards as:
    - Immediate Action Required – rating >12
    - Action Required – rating 9-11
    - Action may be required – rating 6-8
    - Action not likely required - <5
  - Identify if this is a repeat finding
  - Recommend corrective actions for observed problems or hazards, and
  - Sign and date the report and forward the report to the Senior Manager to sign
  - Post a copy of report to the Health and Safety Board
  - Save the completed workplace inspection form in the public drive under **T:\Health and Safety\ Meetings & Inspections**

All hazards identified on the Workplace Inspection Form must be addressed and appropriate corrective actions implemented with sign-off on the form before the next inspection. If it is not possible for a hazard to be addressed or corrected before the next inspection, then that same hazard needs to be carried over and recorded again on the following inspection.

## TRAINING

The Company will ensure that all employees who are designated to conduct investigations are trained and educated in Workplace Inspections, hazard identification, assessing risk, and identifying controls, and that they are clear about their roles and responsibilities as well as this policy and its procedures.

Individuals who have been assigned responsibilities under this policy will be trained on their duties and expectations. Training will be coordinated by the Senior Manager and the new Health and Safety representative. A record of training will be maintained and filed with Human Resources.

## COMMUNICATION

A copy of this policy will be made available to all employees.

Any of the following method(s) may be used to communicate this policy:

- Company email
- Company memo
- On-line posting
- Posting of policies and procedures in the public drive
- Training
- Meetings and Safety talks

## EVALUATION

Monthly, the worker Health and Safety Representative will review the status of the items raised during the previous month's inspection by:

- Reviewing the Workplace Inspection Report to ensure sign-off by Senior Management indicating they have reviewed the inspection report.
- Reviewing Management's response to the recommended actions
- Verifying corrective actions have been implemented and are working
- Reporting findings to Senior Management

Annually, Human Resources will evaluate conformance with the Workplace Inspection Program by:

- Reviewing the Workplace Inspection Report to ensure:
  - Inspections were completed according to the schedule
  - Inspections were conducted by designated and trained individuals

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- Reports were distributed within the defined timeline
- Sign-off by Senior Management indicating the report was reviewed monthly.
- Reports were filled out accurately including assigned responsibility for corrective actions and target dates
- Completion dates were identified for corrective actions
- Verify corrective actions have been completed in a reasonable amount of time
- Verifying the Workplace Inspection Reports and Inspection schedule have been posted by checking the Health and Safety Board for the most current inspection report and schedule.
- Reviewing the Workplace Inspection Form to verify that it is appropriate for the hazards being identified and the current business activities.

## **EXHIBITS/FORMS**

F226.1 Workplace Inspection Form Template

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## **Policy & Procedure: P227**

### **Subject: Management of Change**

#### **PURPOSE**

The purpose of this policy is to outline the health and safety requirements when changes to the operation are implemented. This will ensure the effective management of workplace change consistent with sound health and safety practices.

#### **SCOPE**

This policy is applicable to all employees of the “Company” (FST Canada Inc.).

#### **POLICY**

The need for change at the Company may result from, but is not limited to, internal and/or external influences such as legislation, equipment purchases, process or procedure changes, injuries or incidents, near misses or a change in a member of staff.

Workplace change should be planned and supported by the Owners and Senior Management Team of the Company. Change must be effectively implemented to ensure safety.

#### **PROCEDURE**

Job Hazard Assessments (JHA’s) must be reviewed when changes to the operation are implemented. Specific requirements are outlined below when a (an):

##### **New Employee is Hired:**

1. When a new employee is hired, an Assessment of Training Requirements: Checklist must be completed.
2. The new employee must be provided with a copy of the JHA for the role in which they were hired.
3. The new employee must review the JHA to ensure they are aware of the hazards associated with their role, as well as the controls that are in place to reduce the hazards.
4. The employee will be encouraged by their manager to ask any questions they may have when reviewing the JHA.
5. Once the JHA has been reviewed and understood, there must be sign-off by the employee. A copy of the sign-off must be kept at the branch and a copy must also be sent to Human Resources to be stored in the employee’s personnel file.

##### **Employee is Transferred or Promoted:**

1. When an employee is transferred or promoted, an Assessment of Training Requirements: Checklist must be completed.
2. The employee who has been transferred or promoted must be provided with a copy of the JHA for their new role.
3. The new employee must review the JHA to ensure they are aware of the hazards associated with their new role, as well as the controls that are in place to reduce the hazards.
4. The employee will be encouraged by their manager to ask any questions they may have when reviewing the JHA.

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- Once the JHA has been reviewed and understood, there must be sign-off by the employee. A copy of the sign-off must be kept at the branch and a copy must also be sent to Human Resources to be stored in the employee's personnel file.

**Legislation Change:**

- When there is a legislation change that affects a role or roles at the Company, the JHA's must be reviewed and updated. Employees, manager's and the HR department will work together to update the JHA's.
- Any additional hazards incurred from the legislation change must be added to all applicable JHA's.
- The updated JHA's must then be reviewed by all employees in a role in which their JHA was affected.
- Once the JHA has been reviewed and understood, there must be sign-off by each employee. A copy of the sign-off must be kept at the branch and a copy must also be sent to Human Resources to be stored in the employee's personnel file.

**Process or Procedure Change:**

- When there is a process or procedure change that affects a role or roles at Company, the JHA's must be reviewed and updated. Employees, manager's and the HR department will work together to update the JHA's.
- Any additional hazards incurred from the process or procedure change must be added to all applicable JHA's.
- The updated JHA's must then be reviewed by all employees in a role in which their JHA was affected. The supervisor is responsible for ensuring this is completed.
- Once the JHA has been reviewed and understood, there must be sign-off by each employee. A copy of the sign-off must be kept at the branch and a copy must also be sent to Human Resources to be stored in the employee's personnel file.

**New Equipment is Purchased:**

- When a new piece of equipment is purchased, JHA's must be reviewed and updated. Employees, manager's and the HR department will work together to update the JHA's.
- Any additional hazards incurred from the purchase and use of the new equipment must be added to all applicable JHA's.
- The updated JHA's must then be reviewed by all employees in a role in which their JHA was affected. The supervisor is responsible for ensuring this is completed.
- Once the JHA has been reviewed and understood, there must be sign-off by each employee. A copy of the sign-off must be kept at the branch and a copy must also be sent to Human Resources to be stored in the employee's personnel file.

**First Aid is Provided:**

- When first aid has been provided to an employee in the workplace, the JHA for that employee's role must be reviewed and updated.
- If the task that was being completed at the time of the first aid injury is not listed on the JHA, it must be added, along with any hazards associated with that task and the controls that are put into place to reduce those hazards.
- If the task is listed on the JHA but the hazard that caused the injury is not, then the hazard as well as controls must be added to the JHA.
- Employees, manager's and the HR department will work together to update the JHA's.
- The updated JHA must then be reviewed by all employees in the role in which the JHA was affected.
- Once the JHA has been reviewed and understood, there must be sign-off by each employee. A copy of the sign-off must be kept at the branch and a copy must also be sent to Human Resources to be stored in the employee's personnel file.

**Injury or Incident Occurs in the Workplace:**

- When there is an injury or incident in the workplace, the JHA for that employee's role must be reviewed and updated.

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2. If the task that was being completed at the time of the injury or incident is not listed on the JHA, it must be added, along with any hazards associated with that task and the controls that are put into place to reduce those hazards.
3. If the task is listed on the JHA but the hazard that caused the injury is not, then the hazard as well as controls must be added to the JHA.
4. Employees, manager's and the HR department will work together to update the JHA's.
5. The updated JHA must then be reviewed by all employees in the role in which the JHA was affected.
6. Once the JHA has been reviewed and understood, there must be sign-off by each employee. A copy of the sign-off must be kept at the branch and a copy must also be sent to Human Resources to be stored in the employee's personnel file.

**When a Near Miss Occurs:**

1. When a near miss occurs in the workplace, the JHA for the role in which the near miss occurred must be reviewed and updated.
2. If the task that was being completed at the time of the near miss is not listed on the JHA, it must be added, along with any hazards associated with that task and the controls that are put into place to reduce those hazards.
3. If the task is listed on the JHA but the hazard that caused the near miss is not, then the hazard as well as controls must be added to the JHA.
4. Employees, manager's and the HR department will work together to update the JHA's.
5. The updated JHA must then be reviewed by all employees in the role in which the JHA was affected.
6. Once the JHA has been reviewed and understood, there must be sign-off by each employee. A copy of the sign-off must be kept at the branch and a copy must also be sent to Human Resources to be stored in the employee's personnel file.

For any changes that occur at the Company that are not listed above, please consult the Human Resources Department for specific requirements that must be followed in order to ensure the health and safety of all employees.

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## **Policy & Procedure: P228**

### **Subject: Return to Work Program**

#### **PURPOSE**

To assist workers if they have been injured (physically or mentally) in the return to work in a safe and timely manner. This policy will outline the expectations of how the “Company” (FST Canada Inc.), will work with healthcare providers, employees and management to facilitate the return-to-work process and how it will provide accommodation for an employee who is temporarily or permanently unable to return to their duties as a result of an occupational injury or illness.

#### **SCOPE**

This policy is applicable to all employees of the Company.

#### **POLICY**

The Company is committed to co-operating with all of their employees who have been injured on the job and will do everything they can for an early and safe return to work. The program is a proactive and collaborative process that consists of a return-to-work process, a modified work program for any injured employee until he/she is able to return to their pre-accident job and it will have a component that will enable joint responsibility to achieve the outcome of a safe and timely return to work. This program will facilitate the employee’s recovery and return to work in as safe a manner as possible, is fair, consistent and cost effective, while also minimizing the human and financial impact on the employee.

#### **DEFINITIONS**

**The “Company”** - FST Canada Inc., operating as various business entities.

**Occupational Injury** – any kind of injury that results at the workplace, including illness or disease

**Occupational disease** - a disease contracted as a result of an exposure over a period of time due to hazards arising from work activity.

**Occupational Accident** - a sudden and unexpected accident caused by external factors due to which the employee suffers injuries

**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 employee is impaired.

**Temporarily Disabled Employees** - Employees who are temporarily unable to do their regular job duties due to a compensable injury

**Permanently Disabled Employees** – Employees who are permanently disabled due to a compensable injury

**Lost Time** – Wage loss due to a work-related injury or illness resulting in missing scheduled time past the day of the injury or illness

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**Loss of Earnings (LOE) Benefit** – A benefit equal to 85% of employee’s pre-injury net average earnings, less any earnings that he or she earns while co-operating in an RTW Program.

**Work Reintegration** – Integration of effort and co-operation of the workplace parties (workers and employers), as well as the treating health professional, and the WSIB in participation in the rehabilitation of the employee through goal-oriented work transition plans in an accessible, timely manner.

**Return to Work (RTW)** – A program to enable employee to remain at the workplace following an injury or to return to the workplace in a safe and timely manner if there has been lost time from work

**Work Transition** – A WSIB/WCB program to help injured employees get back to work. The primary focus of WT is to find long-term, suitable work with current employer or in the general labor market.

**Re-employment** – When an injured employee is able to perform the **essential functions** of the preinjury job, the employer must:

- Offer to re-employ the injured worker in the job that was held on the day of the injury, or
- Offer to provide another job that is similar in nature and pays at least 90% of what the injured worker was earning before the injury.

**Accommodated, Modified and Suitable Work** – The Company recognizes that a temporarily disabled employee can, and should, be performing meaningful and productive work. The modification of an employee’s position allows for the employee to carry out the work assigned within the employees’ capabilities. Note: this might include, but not be limited to, a change in work tasks.

**Functional Abilities** – The actual or potential **capacity** of an individual to perform the activities and tasks that can be normally expected. A given **function** integrates biological, psychological and social domains.

**Essential Function (duties)** – The basic and important job functions performed in a position and must be based on the work performed rather than the capabilities of an individual. An essential function is a complete task rather than how a task can be completed. If an essential function is removed, then the need for that particular position will not exist. For example, removing the essential function “provide guidance and resources to clients” from a customer service position would fundamentally change the job position.

## ROLES AND RESPONSIBILITIES

The following responsibilities apply:

### Employer will:

- Provide a fair and consistent rehabilitation policy for injured employees
- Provide meaningful employment for temporarily disabled employees and promote modified duties
- Ensure that all employees are informed of the Return-to-Work program
- Train all Managers in effective Return to Work strategies
- Ensure Workplace Safety and Insurance Act is adhered to
- Assist in the modification of the workplace as required, up to the point of undue hardship
- Pay full wages and benefits for the day or shift on which the injury occurred
- Make certain that workers understand their obligations to co-operate
- Set clear procedures to follow in reporting injuries. (Establish an Accident/Injury Reporting Policy)

### Managers will:

- Take appropriate action when an injury or illness is reported
- Provide workers with **Injured Worker Package** that includes a Functional Abilities Form to take to the treating practitioner for completion
- Inform Human Resources immediately when it becomes known that an employee under their care requires assistance from the RTW program

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- Along with HR, contact employees that have not returned to work the day following a work-related injury or illness, and discuss return to work options
- Educate workers about the return-to-work program
- Participate in the Return-to-Work planning by identifying appropriate work duties, transitional work options and temporary or permanent job accommodations for employees with disabilities
- Determine training requirements to meet the skills required for any new tasks as determined by assigning temporary or permanent job accommodations
- Follow Health Care Professional’s opinions and/or recommendations whenever possible to assist with safe work offerings
- Monitor safe work practices of workers who are returning to work to help ensure employees perform only the work offered and are not assigned other duties then described in the written RTW offering without first assessing new work
- Assist with monitoring employee’s progress during injury or illness recovery and the effectiveness of the work assigned and the integration back into regular duties when required
- Provide feedback to Human Resources

**Injured Workers will:**

- Report all job-related injuries or illnesses to Supervisor/Manager immediately
- When needed receive proper medical treatment immediately following a work-related injury/illness
- Ensure that they take an **Injured Worker Package** when seeking medical and to provide this package to the treating health professional that Return-to-Work opportunities are available in the workplace to accommodate their abilities
- Upon return from seeking medical provide the appropriate medical documentation to the Manager or HR within 24 hours the WSIB Form 7, to develop with the employer, a return-to-work plan
- Help identify and co-operate in suitable work arrangements
- Give WSIB information as required
- Maintain regular contact with the Manager and Human Resources as outlined in this program
- Follow the restrictions and recommendations of treating health professionals and work within the scope of limitations and do not perform work that has not been developed within the work reintegration plan
- Communicate any concerns or changes in medical condition to their Manager and/or Human Resources
- When requested, provide the necessary progress reports (WSIB/WCB – Functional Abilities Form) to Health Care Providers and ensure forms are returned to the manager and/or Human Resources and WSIB case manager as soon as possible
- Ensure all rehabilitative appointments and independent assessments provided are attended as required and whenever possible schedule outside normal scheduled working hours
- Co-operate with all requests of documentation to be provided/ obtained or completed as required by the employer or the WSIB/WCB

**Joint Health and Safety Committee (JHSC)/Health and Safety Members will:**

- Work with Human Resources to review the RTW Program on an annual basis

**Human Resources will:**

- Work with injured worker, the healthcare professional and the Manager to create an offer of Modified Duties, Accommodation and Suitable Work
- Monitor the progress of the employees’ modified duties through regularly scheduled meetings with the employee and manager. These meetings are to be documented by using the Follow-Up Accommodated, Modified, Suitable Work Offering form (F228.3)
- If there are any changes in the injured workers medical, ensure medical follow-up documentation is obtained
- Obtain education and training resources from WSIB to ensure compliance with Work Reintegration polices
- Support Work Reintegration Program
- Facilitate the RTW Program with key stakeholders

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- Communicate with the Employee, Manager, Medical Personnel, and WSIB as appropriate
- Provide support as required, guidance and interpretations of this policy and legislation to all parties as required

**Workplace Safety and Insurance Board (WSIB) will:**

- Process the claim on a timely basis
- Act as a resource
- Follow the Workplace Safety and Insurance Act
- Assist employer and injured worker with a Return-to-Work plan (if applicable)

**PROCEDURE**

**Injured Worker Package includes the following documents:**

- Letter to Health Practitioner
- Letter to Employee
- Functional Abilities Form (FAF) or Form 8 or
- Occupational Mental Stress Report Form CMS8

Report all work-related injuries and medical complaints immediately to your manager. All critical injuries and fatalities MUST be reported to the Ministry of Labor.

If a worker requires more than first aid, send worker for medical treatment. The **Injured Worker Package** is to be sent along with the employee to provide it to the attending physician.

**Steps to Follow:**

1. When a worker requires health care, has incurred Lost Time or where modified work is required based on the Functional Abilities Form (FAF), the Manager and/or Human Resources will establish contact with the injured employee, no later than 2 business days after learning of the occupational injury, illness or disease. Contact details are to be logged using Form F228.1.
2. The FAF is to be returned by the employee after seeking healthcare.
3. Upon contact, an offer of modified work will be made to the employee (depending on the severity or circumstances)
  - A verbal offer is only acceptable if the employee did not immediately return to work after seeking health care but did make contact with the Company representative. All verbal offers will be temporary in nature until a formal Offer of Modified/Suitable work can be presented and signed by the employee. Verbal offers of modified work will be based on the recommended functional abilities (if any) as listed on the Health Professional Report (WSIB Form 8), FAF or other acceptable medical documentation.
4. All communication is to be logged and detailed using the Contact & Communication Log throughout the process (form F228.1). This log is to record dates of contact (or attempts to contact) and a summary of the communications. Where a verbal offer of modified work has been given, details of that offer and conversation are to be recorded.
5. Once the worker and the Company representative have been in contact, the Company representative will make the formal written Offer of Modified/Suitable work offering using form F228.2. Once the offer has been accepted the Worker/Manager/Human Resources Representative will create and discuss the Return-to-Work plan. This plan will be documented and approved by all parties by using a Return-to-Work Plan - Offer of Modified, Suitable Work Form (F228.2). A copy will be provided to the WSIB/WCB and it is recommended that the employee provide this offer of modified/accommodated work description to their Healthcare practitioner for review when possible.

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6. It is the responsibility of the employee to keep their manager informed of the status of any changes to their medical recovery and any absences related to an occupational injury, illness or disease.
7. The employee will be expected to schedule medical and/or rehabilitation appointments, when possible, outside of scheduled working hours.
8. For occupational injury, illness or disease, failure to comply with the procedure may impact an employee's benefit eligibility or may result in financial penalties to the department.
9. In cases where the workplace parties are unable to agree on the details or implementation of the RTW plan, the plan will be referred to WSIB for mediation and decision.
10. Based on the Return-to-Work plan and duration of the plan's requirements; regular follow up of the recovery progress may be required. The follow up discussions or potential changes to the RTW plan are to be documented on the Follow-Up Accommodated, Modified, Suitable Work Offerings (F228.3). This will be considered the working document to be used throughout the duration of the Return-to-Work program.
11. Contact with the WSIB is essential to maintain reporting requirements as outlined by WSIB. Information will be provided to the WSIB during the Return-to-Work process. Such information will include:
  - work related injuries/illnesses/diseases sustained when healthcare treatment was obtained
  - medical monitoring
  - work offering programs, or changes in duties/requirements/restrictions
  - loss time or wages or changes in wage
  - change in any information or statuses as they become known
  - information of any failure to cooperate in the programs as outlined in this policy
  - the end of the program
12. Upon the completion of the Return-to-Work Program, it is important for the worker to complete the Return-to-Work Employee Survey (P228.5). The Company's goal is to conduct this survey 6-9 months following the date of an injury). This participation assists the Company with gaining an understanding of the effectiveness of the RTW Program and will contribute to the continuous improvement of the Health & Safety Program.

The return-to-work program is completed when the employee can do the pre-accident job. If the employee cannot return to pre-accident duties at the conclusion of the plan, the manager shall contact the WSIB claims adjudicator for further assistance.

## **COMMUNICATION**

All employees of the Company will receive communication of this policy during orientation within the first week of hire. If revisions are made to the policy, additional communication will be provided to all employees.

Any of the following method(s) may be used to communicate this policy:

- Company email
- Company memo
- Posting of policies and procedures
- Training
- Meetings and Safety talks

## **TRAINING**

The Company will ensure that all employees are trained and educated in the RTW Procedures and that they are clear about their roles and responsibilities as well as this policy and its procedures.

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All training shall be documented in an electronic training database and a copy shall be provided to Human Resources for filing.

## **EVALUATION**

This procedure shall be evaluated by the JHSC, and Human Resources annually. The evaluation completed will identify the success of the program or identify if improvements are necessary to further the effectiveness of the program's requirements.

- Ensure legislation is current or has it been changed
- Ensure policy is clear and able to be understood
- Ensure appropriate individuals have received communication of the program
- Ensure proper use of the Return-to-Work Contact and Communication Log
- Ensure proper use of the Accommodated, Modified, and Suitable Work Offerings Report
- Measure lost time injuries in current year against past years
- Evaluate at least annually employee surveys to determine the effectiveness of the program

## **EXHIBITS/FORMS**

F228.1 Contact and Communication Log

F228.2 Return to Work – Offer of Modified, Suitable Work

F228.3 Follow-up Accommodated Modified and Suitable Work Offerings Form

F228.4 Return to Work Program Employee Survey

F228.5 Return to Work Program Self-Assessment

### ***Additional References***

- Form 7
- Form 8
- Functional Abilities From (FAF)
- Letter to Health Practitioner
- Letter to Employee

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## Policy & Procedure: P229

### Subject: Severe Storms and Tornado

#### PURPOSE

The following procedure is outlined to assist in protecting individuals against severe winds caused by severe storms and tornadoes.

#### SCOPE

This policy is applicable to all employees of the “Company” (FST Canada Inc.), its Contractors and Visitors.

#### DEFINITIONS

**Tornado Watch** – Means that conditions are favorable for tornadoes to develop. Tornadoes are most likely to occur in the late afternoon on a hot spring day. However, tornadoes have occurred in every month at all times of the day or night.

**Tornado Warning** – Is an alert issued by weather services to warn that [severe thunderstorms](#) with [tornadoes](#) may be imminent. It can be issued after a tornado or [funnel cloud](#) has been spotted by eye or more commonly if there are [radar](#) indications of tornado formation. **If a Tornado Warning is issued for your area, you need to seek shelter in the facilities designated storm shelter area IMMEDIATELY!**

#### PROCEDURE

1. Managers, Supervisors and Employees (as a team effort) need to communicate to one another when weather conditions (sky color, wind, and hail) are looking severe.
2. Once it has been determined that weather conditions are looking severe, Managers and Supervisors are responsible for monitoring the weather and any alerts, watches or warnings that may be issued. Use cell phones and computers and monitor your local weather station.
3. If a **Tornado Watch** is issued for the area, the Manager or Supervisor is responsible for informing all shift managers of the watch who will in turn ensure their employees are aware. NO ALARM will be sounded for a Tornado Watch.
4. If a **Tornado Warning** is issued for the area, the first individual to become aware of the Tornado Warning is responsible for activating the “*Tornado Warning Signal*”. The “*Tornado Warning Signal*” will consist of either one or both of the following:
  - An announcement made over PA system
  - A single, long sounding blast of the air horn
5. Upon hearing one of the above “*Tornado Warning Signals*” – immediately proceed to the closest [storm shelter area](#) at your facility. Do not stay in the shop as large buildings with wide span roofs may collapse if a tornado hits
6. In the event that you cannot get to a [storm shelter area](#), then the ideal shelter would be in the kneehole of a desk, table or workbench. Move away from windows, doors, outside walls, parts storage racks, file cabinets or any other items which may fall or become flying missiles. Remain in the protected area until your manager or Supervisor contacts you.
7. Stay in the shelter until a member of management has informed you that an all clear has been issued
8. Following the Tornado Warning, Managers and Supervisors are responsible for conducting a head count of their employees

9. In the event of a **direct hit by a tornado**:
  - Kneel face down with your hands covering the back of your head to reduce neck injury
  - Where possible, get under a desk or table
  - Keep calm and stay in your shelter until after the storm is over. Do not leave the shelter unless directed to do so by a manager or Supervisor
10. Once the storm is over:
  - Check the people around you for injuries
  - Administer first aid as required
  - Call local emergency services at **911**
  - Managers and Supervisors are responsible for conducting a head count of their employees and reporting to emergency response personnel any missing individuals
  - Check all utility lines:
    - Check for the smell of gas and if gas odor is noticeable, open doors and turn off the main valves. Do not turn on lights until the gas has dissipated.
    - If electric wires are shorting out, turn off the power
    - When you go outside, watch out for downed power lines
  - Employees will be instructed of next steps following a tornado by Executives and Senior Managers

**If you are outdoors:**

1. Find shelter, preferably in a building with a strong foundation
2. If no shelter is available, lie down in a ditch - beware of flooding from downpours and be prepared to move
  - Kneel face down with your hands covering the back of your head to reduce neck injury
  - Keep calm and stay in your shelter until after the storm is over

**If you are driving:**

1. If you spot a tornado in the distance, go to the nearest solid shelter
2. If the tornado is close, get out of your car and take cover in a low-lying area, such as a ditch
  - Kneel face down with your hands covering the back of your head to reduce neck injury
  - Keep calm and stay in your shelter until after the storm is over

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## Policy & Procedure: P230

### Subject: Hot Work Policy & Procedure

#### PURPOSE

To provide employees with a procedure to follow when conducting hot work, in order to ensure hot work activities are conducted in a safe manner.

#### SCOPE

This policy is applicable to all employees of the “Company” (FST Canada Inc.), and its contractors who perform Hot Work at the Company’s site.

#### POLICY

This policy was developed to ensure that the **Hot Work** will be managed, and proper actions are taken to prevent loss due to fire caused by **Hot Work** (cutting, soldering & welding, explosion or any other activity that involves an open flame). All affected employees and contractors will receive instruction as to the expectations of them to ensure compliance with this policy.

#### DEFINITIONS

The “**Company**” - FST Canada Inc., operating as various business entities.

**Hot Work** – any operation that produces flames, sparks or heat that is capable of initiating fires or explosions such as torch heating/cutting, welding, brazing, grinding, etc.

**Fire Watch** – is a person, other than the person conducting the **Hot Work**, and who works alongside the employee who performs hot work, who is designated to maintain a constant vigil for stray sparks, ignition or other fire hazards during the hot work. This could be the person who is working directly beside the person who is conducting the **Hot Work** or a designated person who works with the person conducting the **Hot Work**.

#### ROLES AND RESPONSIBILITIES

The following responsibilities apply:

##### Employer will:

- Assess the workplace for any possible fire hazards associated with **Hot Work**
- Prepare a written **Hot Work** Program which will be reviewed periodically and changed as required
- Take all precautions to eliminate or control all identified **Hot Work** hazards
- Involve workers in the hazard assessment and control process
- Educate all workers on the hazards and the methods of elimination or control of performing **Hot Work**
- Ensure all applicable PPE is available to perform Hot Work safely

##### Manager/Supervisors will:

- Ensure Hot Work equipment (gas cylinder, torch, valve, hose, etc.) is in good condition
- Ensure Hot Work operators are trained and are provided the required PPE
- Ensure fire prevention measures have been taken
- Sign off on the **Hot Work Permit** form

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**Employees will:**

- Inspect to ensure **Hot Work** equipment (gas cylinder, torch, valve, hose, etc.) is in good condition
- Use the appropriate PPE for **Hot Work**
- Complete the **Hot Work Permit** checklist as a fire prevention precautionary measure

**Fire Watch will:**

- Assist Hot Work Operator in preparation and clean-up of Hot Work area
- Assess 35' radius for potential fire hazards
- Be alert to any changes and identify changes or concerns to Hot Work Operator

**Joint Health and Safety Committee (JHSC)/Health and Safety Members will:**

- Participate in an annual review of this procedure and make recommendations if necessary
- Observe powered lift trucks operations and report unsafe practices to the appropriate supervisor
- Review copies of inspection checklists

**Human Resources will:**

- Ensure safe operating procedures are developed, known, understood and used
- Maintain copies of training and evaluation documentation, electronically and in employee files

**Contractors will:**

- Report any fire hazards to their designated Company employee
- When **Hot Work** is to be performed by Contract employees the Contractor's Supervisor will be the requester, sign the **Hot Work Permit form**, and serve as supervisor for the work. A Company Manager or Supervisor person's initials are required to endorse the work and ensure discussion of any special requirements with the Contractor.
- See also Contractor Responsibilities in the Internal Responsibilities Section of this manual

**PROCEDURE**

The **Hot Work** Operator performing **Hot Work**:

- Is responsible for performing a fire prevention hazard assessment by completing the **Hot Work** Permit checklist.
- If any flammable/ combustible materials exist within the Hot Work area, NO Hot Work is permitted until all material is removed
- If any flammable/combustible surfaces exist within 11m (35ft) of the **Hot Work** area, **NO** Hot Work is permitted until the surfaces are shielded, covered, or barricaded with heat resistance/welding blankets/ curtains or materials
- Obtain an authorization signature from a manager or supervisor on the checklist is complete, PRIOR to conducting **Hot Work**
- Must inspect the area after the **Hot Work** is completed to identify any potential smoldering fires
- Must periodically monitor the **Hot Work** area for a minimum of 1 hour after the **Hot Work** is complete so any fire risk is able to be assessed

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## FIRE WATCH MONITORING PERIODS

<b>Occupancy Factors</b>	Noncombustible with any combustibles contained within closed equipment (e.g., ignitable liquid within piping)					
	Office, retail or manufacturing with limited combustible loading					
	Manufacturing with moderate to significant combustible loading except as noted below					
	Warehousing					
	<b>Exceptions:</b> Occupancies with processing or having bulk storage of combustible materials capable of supporting slow-growing fires (e.g., paper, pulp, textile fibers, wood, bark, grain, coal or charcoal)					
<b>Construction Factors</b>						
Noncombustible construction, or FM Approved Class 1 or Class A building materials		Combustible construction without concealed cavities		Combustible construction with unprotected concealed cavities		
<b>Watch</b>	<b>Monitor</b>	<b>Watch</b>	<b>Monitor</b>	<b>Watch</b>	<b>Monitor</b>	
30 minutes	0 hours	1 hour	3 hours	1 hour	5 hours	
1 hour	1 hour	1 hour	3 hours	1 hour	5 hours	
1 hour	2 hours	1 hour	3 hours	1 hour	5 hours	
1 hour	2 hours	1 hour	3 hours	1 hour	5 hours	
1 hour	3 hours	1 hour	3 hours	1 hour	5 hours	

## COMMUNICATION

Any of the following method(s) may be used to communicate this policy:

- Company email
- Company memo
- Posting of policies and procedures
- Training
- Meetings and Safety talks

## TRAINING

The Company will ensure that all employees authorized to perform **Hot Work** are trained and educated in performing **Hot Work** and that they are clear about their roles and responsibilities as well as this policy and its procedures.

## EVALUATION

Human Resources collaborate with the Joint Health and Safety Committee, to evaluate the success of the program by reviewing:

- Hot Work Permit
- Accident and incident data

## EXHIBITS/FORMS

Hot Work Permit  
SWP – Hot Work  
SWP – Oxy-Fuel Application Safety  
SWP – Connecting and Adjusting Gas Supply

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## WARNING - HOT WORK IN PROGRESS!

This Hot Work Permit is required for any temporary operation involving open flames or producing heat and/or sparks, conducted outside a Hot Work Designated Area. This includes, but is not limited to brazing, cutting, grinding, soldering, torch-applied roofing, and welding.

HOT WORK PERFORMED BY:	Date	Time
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HOT WORK LOCATION	VEHICLE #	HOT WORK DESCRIPTION
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NAME OF PERSON PERFORMING FIRE WATCH:

I verify the above location has been examined, the required precautions have been taken, and permission is authorized for this work.

NAME OF PERSON AUTHORIZING PERMIT

Print:	Sign:
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THIS PERMIT EXPIRES ON (LIMIT PERMIT TO ONE SHIFT)

DATE:                      TIME:                       AM     PM

Hot Work Start Time: <input type="checkbox"/> AM <input type="checkbox"/> PM	Hot Work Finish Time: <input type="checkbox"/> AM <input type="checkbox"/> PM
---------------------------------------------------------------------------------	----------------------------------------------------------------------------------

\*\*\*THIS LOCATION WILL BE EXAMINED AND THE NECESSARY PRECAUTION WILL BE TAKEN TO PREVENT A FIRE OR EXPLOSION OR INJURY/ILLNESS FROM OCCURRING.

### INITIAL CHECK

CUMBUSTIBLES IN AREAR ARE CLEARED, SHEILDED, OR ISOLATED AND ARE KEPT 35FT AWAY FROM THE WORK AREA	<input type="checkbox"/> YES	<input type="checkbox"/> NO
WALL/FLOOR/ELECTRICAL COVERINGS IN PLACE?	<input type="checkbox"/> YES	<input type="checkbox"/> NO
FLOOR AREAS ARE CLEAN?	<input type="checkbox"/> YES	<input type="checkbox"/> NO
FIRE EXTINGUISHER IS AVAILBLE?	<input type="checkbox"/> YES	<input type="checkbox"/> NO
PORTABLE EXHAUST EXTRACTOR AVAILABLE?	<input type="checkbox"/> YES	<input type="checkbox"/> NO
WELDING CURTAINS ARE AVAILABLE?	<input type="checkbox"/> YES	<input type="checkbox"/> NO
REQUIRED PERSONAL PROTECTIVE EQUIPMENT AVAILABLE?	<input type="checkbox"/> YES	<input type="checkbox"/> NO
EQUIPMENT HAS BEEN INSPECTED AND IS IN GOOD REPAIR?	<input type="checkbox"/> YES	<input type="checkbox"/> NO

\*\*\* If "NO" is answered in any question, special precautions must be taken! Please report to your Manager or Team Lead for assistance as necessary.

Special Precautions to be taken:

### WARNING HOT WORK IN PROGRESS FIRE WATCH

1-hour post-work fire watch check	Permit Holder Signature:
2-hour post-work fire watch check	Permit Holder Signature:
Final post-work check. Enter Time: <input type="checkbox"/> AM <input type="checkbox"/> PM	Supervisor/Manager Signature:

In case of emergency, call 911



## Policy & Procedure: P231

**Subject: Hazard Identification, Risk Assessment and Control**

### PURPOSE

The Company (FST Canada Inc.) will take a proactive approach to health and safety by implementing a system of hazard identification and risk control to prevent workplace injuries and illnesses.

### SCOPE

This policy applies to all employees of the Company.

### POLICY

The Company will ensure the ongoing health and safety of all employees through Hazard Identification and Risk Assessment reporting to track and monitor workplace hazards, risks and controls. The scope of the program will include a Job Hazard Assessment (JHA) for each position in the organization and specifies the methods that will be used to control or eliminate the hazards.

### DEFINITIONS

**The “Company”** - FST Canada Inc., operating as various business entities.

**Hazard** - A hazard is anything that can cause injury or illness to people, or damage to property. A hazard may occur from what people do, or may occur because of their working conditions

**Health Hazard** – A physical, chemical, biological or psychological hazard which may cause acute or chronic health effects in exposed employees (e.g. dust, heat, ergonomics, etc.). For example, noise induced hearing loss is often not detected until it is well advanced.

**Safety Hazard** – A substance, process, action or condition, which may endanger the immediate safety of employees (e.g. chemical burns, shear points, etc.). For example, if a worker trips and falls to the floor breaking an arm or gets their fingers caught in a piece of moving machinery.

**Exposure** – A measurement of how often the task that is exposed to a hazard is completed

**Severity** – A measurement of how serious the result of the incident might be in terms of injury or loss

**Probability** – The likelihood that the hazard will result in an incident

**Risk** = Exposure + Severity + Probability

**Job Hazard Assessment (JHA)** – a technique to identify the dangers of specific tasks in order to reduce the risk of injury to workers. The process will identify existing and potential hazards and assess the risk and identify methods to eliminate or protect against the hazard.

**Hierarchy of controls** – a list of controls based on most efficient mechanic of reducing or eliminating hazards.

1. Elimination
2. Substitution
3. Engineering
4. Administrative

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5. PPE

**ROLES AND RESPONSIBILITIES**

The following responsibilities apply:

**Employer will:**

- Ensure, as far as it is reasonably practicable, the health and safety of all workers at the work site and that all workers are aware of their responsibilities and duties under the applicable safety acts/regulations
- If reasonably practicable, to involve and inform workers in assessing, controlling and eliminating potential hazards
- Eliminate hazards whenever it is reasonably practicable to do so. If elimination is not reasonably practicable, hazards must be controlled:
  - first by using engineering controls.
  - then substitution, and/or administrative controls; and
  - finally, as a last option, by using personal protective equipment
- In situations where emergency action is required to control or eliminate a hazard that is dangerous to the safety or health of workers; only those workers competent in correcting the hazardous condition may be exposed to the hazard. The number of these exposed workers must be kept to a minimum – as few as is necessary to correct the condition. The employer must make every possible effort to control the hazard while this is being done.

**Manager/Supervisors will:**

- Ensure hazards are controlled using the hierarchy of controls.
- Ensure identified hazards are evaluated and prioritized according to their risk.
- Participate in the review and updates to the JHA's associated to their position

**Workers will:**

- Take reasonable care to protect the health and safety of themselves and other workers, and to cooperate with the employer to protect the health and safety of themselves and other workers
- Be involved in the hazard identification and assessment processes
- Report new or uncontrolled hazards or changes to work operations affecting existing hazard assessments
- Participate in the review and updates to the JHA's associated to their position
- Sign and acknowledge review of their JHA annually or whenever changes to operations or procedures are implemented

**Joint Health and Safety Committee (JHSC)/Health and Safety Members will:**

- Assist with the evaluation of the JHA's annually or as updates are required

**Human Resources will:**

- Ensure the JHA requirements are met

**PROCEDURE**

**Types of Hazards**

**1. Biological Hazards**

- Viruses and bacteria (e.g. SARS, hepatitis, HIV, COVID-19) found in blood, body fluids and human waste
- Mould and fungi found in damp spaces within buildings

**2. Chemical Hazards**

- Gases (e.g. chlorine, hydrogen, oxygen)
- Vapours (e.g. formaldehyde, acetone, paint, varsol, gasoline)
- Dusts (e.g. asbestos, wood dust)
- Fumes (e.g. welding, engine exhaust)
- Chemicals (e.g. cleaning supplies, laundry detergent, solvents)

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### 3. Physical Hazards

- Ergonomic
  - Awkward postures (e.g. stooping to pick up boxes, reaching across equipment to perform work)
  - Highly repetitive motions (e.g. mopping floors, fabrications)
  - Static (fixed) positions (e.g. sitting or standing for long periods)
- Wet floors, slippery sidewalks
- Moving parts of machinery (e.g. mechanical lifts, bench grinder)
- Working at heights (e.g. falling off roof or elevated platform)
- Pressurized systems (e.g. boilers, air lines)
- Electrical hazards (e.g. poor wiring, worn cords)
- Excess noise (e.g. hand tools, running trucks)
- Inadequate lighting (e.g. task lighting, general lighting in hallways, storage rooms)
- Extreme temperatures (hot and cold)

### 4. Psychological Hazards

- Employee stress (e.g. resident illness and death)
- Employee fatigue (e.g. work demands, shift work)
- Workplace violence (e.g. resident to staff, visitor to staff)

## Types of Hazard Assessments

### Informal Hazard Assessment

- Completed by workers before they start & while they are completing their tasks
- May or may not involve a checklist

### Formal Hazard Assessment

- Completed by employees on an annual basis (at a minimum)
- Uses a formal hazard assessment form to systematically identify, evaluate, prioritize and control hazards for all jobs and tasks in the organization

### Field Level Hazard Assessment

- Completed by workers before they start work at a customer/vendor site
- Will include a checklist to be signed by the worker and the site contact

## CONDUCTING A FORMAL HAZARD ASSESSMENT

A Job Hazard Assessment (JHA) Matrix contains four basic categories for the hazard identification, risk assessment and risk control process.

1. Job Task Inventory Analysis
2. Hazard Identification
3. Risk Assessment
4. Control Measures

- **Elimination/substitution** — Remove the hazard from the workplace or replace it with something less harmful.
- **Engineering controls** — Control the hazard at the source. Examples include machine guards to prevent access, enclosing processes to reduce exposure and ventilation systems.
- **Administrative controls** — Control the hazard along the path. Implement standard operating procedures, provide training and education to employees, and administer housekeeping and preventative maintenance programs.

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- **Personal protective equipment (PPE)** — The use of PPE is not a stand-alone control because it controls the hazard at the worker.

**5. Review Process**

- At least annually
- When changes to the operation are implemented
- When new equipment comes into the facility
- If incident investigations indicate any deficiencies
- If trend analysis of incident statistics indicates problem areas
- If regular workplace inspections indicate there are hazards that are not being controlled
- If hazards are reported and the controls are not implemented or are not appropriate

**CONDUCTING A FIELD LEVEL HAZARD ASSESSMENT**

Prior to starting any non-routine task or work at a temporary work site, a hazard assessment should be completed using a Field Level Hazard Assessment form. Doing so improves the workers ability to identify and eliminate hazardous conditions before they lead to a health or safety incident.

1. Complete site checklist
  - The checklist prompts workers to consider a wide range of hazard
2. Assess hazards in area
  - When the hazards have been identified and documented, the next step is to determine how to eliminate or control the hazards to protect the health and safety of workers
3. Notify the site supervisor of hazards identified
4. Develop or identify controls
  - The controls must be in place prior to starting work
5. Obtain site contact signature
  - The completed Site-specific Hazard Assessment form should be signed and dated by the workers, including the supervisor, to confirm that everyone is aware of the hazards and understands how the hazards will be controlled

All employees must comply with control measures and procedures and take responsibility to routinely monitor work activities and immediately report any new hazards.

**COMMUNICATION**

Once the hazard controls are implemented, the Company must ensure that workers affected by the hazards identified in a hazard assessment report are informed of the hazards and of the methods of control used to control or eliminate the hazards.

Any of the following method(s) may be used to communicate this policy:

- Company email
- Company memo
- Posting of policies and procedures
- Training
- Meetings and Safety talks

**TRAINING**

The Company will ensure that all employees are trained and educated in the Hazard Identification and Risk Assessment process and are clear about their roles and responsibilities as well as this policy and its procedures.

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**EVALUATION**

The Joint Health and Safety Committee/Safety Representatives will periodically evaluate the JHA's during the monthly inspections to ensure the JHA's are being updated when an incident occurs, new equipment is introduced or there has been a change in the workplace environment.

The Company will evaluate the JHAs annually, as a minimum to ensure:

- Job tasks are identified, associated risks are identified, and suggested controls are in place and effective.

**EXHIBITS/FORMS**

- SWP Conducting a Formal Hazard Assessment
- SWP Conducting a Site-Specific Hazard Assessment
- F231.1 Formal Hazard Assessment Form
- Job Hazard Assessment (JHA) Inventory
- F207.1 Hazard Reporting Form
- F226.1 Workplace Inspection Form

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## **Policy & Procedure: P232**

### **Subject: Health and Safety Training**

#### **PURPOSE**

This policy reflects the obligations of the Company's (FST Canada Inc.) requirements to provide information, instruction, training, and supervision and assess competence as necessary to ensure, as far as reasonably practicable the health and safety of employees.

#### **SCOPE**

This policy applies to all employees of the Company. Employees with temporary/short-term contracts might attend trainings at their manager's discretion.

#### **POLICY**

Worker training is an important element in achieving company objectives in a safe and effective manner. It is the policy of the Company that all workers must be thoroughly trained so that they have the knowledge and skill base to work in a healthy and safe manner.

New workers, including transfers, rehires, seasonal, temporary and part-time workers all have different training needs. These training needs are to be identified for each individual and/or group. The Company will perform training internally or outsource training to a qualified training agency.

The Company is committed to establishing a training system that:

- Identifies competencies, skills, licenses and qualifications required by all employees
- Establishes a system to identify training needs for health and safety, provides training and assesses the effectiveness of training
- The competency required by all employees is defined for their particular job and a process to ensure that they been acquired and maintained. Competency includes having the knowledge of legal and workplace requirements and the proficiency to carry out their health and safety duties and responsibilities
- Employees receive training that is effective and appropriate for the workplace; this includes periodic refreshers as required
- All employees are oriented to the Health and Safety Management System, emergency procedures, injury reporting, hazard reporting and safe work procedures
- Training is provided for new workers, when workers change jobs or return to work and when a process or legislation is changed
- All occupational health and safety training is documented, and records are maintained; training needs are reviewed regularly

#### **ROLES AND RESPONSIBILITIES**

The following responsibilities apply:

##### **Employer will:**

- Provide all mandatory health and safety training in accordance with the provincial or state legislation.
- Provide specific training for all employees where new technology and / or work processes / environment and task changes.
- Ensure periodic refresher training is undertaken i.e. where employees' duties change, accident / incident and root cause analysis recommendations are put in place, which change the existing process / technology and to assist in the prevention of staff complacency

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- Liaise with Supervisory teams on a regular basis about the planning and organization of health and safety training required for the employees they represent
- Ensure specific training is undertaken for young workers in the workplace

**Managers will:**

- Act in a competent manner in accordance with their respective provincial or state legislation, ensuring that,
  - The training plan is reviewed at least twice per year, where possible quarterly
  - Supervisors have the tools and training to ensure the roles and responsibilities for new employees are appropriate and realistic
  - Training needs of supervisors and managers are identified

**Supervisors will:**

- Be responsible for ensuring on a day-to-day basis that the workers under their supervision are trained and competent to undertake their respective duties based on the required provincial or state legislation
- Provide job-specific training as required

**Employees will:**

- Attend safety training as scheduled and participate in the activities
- Not perform work until they have received the appropriate training and certifications according to provincial/state legislative requirements
- Evaluate the effectiveness of the training classes and provide feedback for improvement, or indicate additional subjects of interest
- Ensure they understand the materials provided at training classes and apply the knowledge to job tasks. If the information provided is not understood, the employee(s) should notify the trainer and/or immediate supervisor of any uncertainties

**Joint Health and Safety Committee (JHSC)/Health and Safety Members will:**

- Participate in the review of the Health and Safety Policy as required

**Human Resources will:**

- Ensure all training records are recorded, and records kept for the duration of employee’s employment or contract, or 3-year period or as local legislation dictates
- Coordinate with Senior Managers, Regional Directors and Managers/Supervisors to provide employee orientation safety training
- Provide assistance for development, and/or coordination for specific training needs

**PROCEDURE**

**INTERNAL TRAINING**

- New hire orientation training includes safety related topics that meet provincial/state legislative requirements using a variety of teaching methods including in-class, online, and practical demonstration training
- Training on Safe work practices, policies and procedures relative to the Health and Safety program is completed internally

**EXTERNAL TRAINING**

- Where external training is required, the company will ensure that a suitable training syllabus has been provided, stating clearly the course training objectives and outcomes
- Records of the course content and certificates of attendance will be entered into the Health and Safety Training matrix retained by Human Resources.

Where no training certificates are issued an evaluation of the training will be completed and recorded on Training Course Evaluation form **F232.3**

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## RECORDS

Safety Training for All Employees will be reviewed or required:

- Periodically by the Department (Quarterly and/or as needed) to determine if specific education, training or instruction on workplace hazards is needed (eg. WHMIS, fall arrest, office ergonomics etc).
- Before a new process, or piece of equipment, is to be put into operation
- Annually to maintain certification or competence
- When situations call for pre-operations training, to ensure a safe operation or procedure

All training activities will be documented. This documentation will include the name of the trainer, the name(s) of the employee(s) trained, the subject of the training, the date and duration of the training.

The Health and Safety Task Specific Training Record form (**F232.1**) will be used as the training documentation and corporate form.

**Training records should be retained and distributed as follows:**

- Copy to HR Department Training File for internal or external review purposes; and
- Copy to Employee File All training certificates are to be provided to HR for record keeping.

Refer to the Health and Safety Training *Smartsheet* to reference various training requirements and expiration timelines.

The effectiveness of training will be evaluated by use of a Post-Training Course Evaluation Form. Employee competence will be evaluated through quizzes or demonstrations.

## TRAINING

- The Company will facilitate training by class-room training, online E-Learning, and external training vendors.
- The Company will ensure that all employees are trained and educated on the Health and Safety Training Policy and ensure they are clear about their roles and responsibilities as well as this policy and its procedures

## COMMUNICATION

Any of the following method(s) may be used to communicate this policy:

- Company email
- Company memo
- Posting of policies and procedures
- Training
- Meetings and Safety talks

## EXHIBITS/FORMS

F232.1 Task Specific Training Record

F232.2 Competency Compliance Sign Off

F232.3 Health and Safety Training Matrix by Position

F232.4 Policy Training Acknowledgment

Training Evaluation Survey (*online platform - Survey Monkey*)

Health and Safety Training Tracker (*Smartsheet*)

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## **Policy & Procedure: P233**

### **Subject: Heat Stress Prevention**

#### **PURPOSE**

To establish, implement, and maintain effective written procedures to prevent the occurrence of heat-related illness and to ensure the ongoing health and safety of employees that are exposed to high levels of heat, and/or other climatic conditions that may cause adverse effects to health and safety in the performance of their regular job duties for the “Company” (FST Canada Inc.). This policy is intended to include both indoor and outdoor work where temperature is a concern.

#### **SCOPE**

This policy is applicable to all employees of the Company. These employees are required to comply with this Heat Stress Prevention Policy and are encouraged to actively participate in identifying ways to reduce the risk of experiencing heat-related illness in the workplace.

#### **POLICY**

The Company is committed to ensuring that our workplace is in compliance with health and safety regulations, and that the threshold values for heat stress and heat strain recommended by the federal, and provincial legislation are observed, and actions are taken appropriately in response to any concerns where an un-acclimatized worker’s core temperature is in danger of exceeding 38 degrees Celsius (100.4 degrees Fahrenheit).

#### **DEFINITIONS**

**The “Company”** - FST Canada Inc., operating as various business entities.

**Heat Stress** - occupational illnesses and injuries due to exposure to extreme heat or work in hot environments resulting in heat stroke, heat exhaustion, heat cramps, or heat rashes

**Dehydration** - A condition that occurs when the body loses too much water and other fluids that it needs to work normally. Dehydration can be caused by not drinking enough water or other fluids and sweating too much.

#### **ROLES AND RESPONSIBILITIES**

The following responsibilities apply:

Employer will:

- Ensure that hazard identification and risk assessments are performed, and that work is safe

Manager/Supervisors will:

- Where temperature is a concern, management and supervisory staff will be required to evaluate the work that will be performed, ensure that appropriate safeguards (first aid plans and materials) are in place, ensure that relief measures (drinking water, rest periods scheduled) are available and implemented, and that staff are appropriately acclimatized to heat when performing work in areas where hot weather exists
- Will communicate information regarding the signs and symptoms of heat stress / disorders

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**Employees will:**

- Participate in health and safety training, and adhere to all health and safety policies and safe work procedures

**Joint Health and Safety Committee (JHSC)/Health and Safety Members will:**

- Review the policy annually

**Human Resources will:**

- Review the policy annually
- Review incident reporting due to heat stress for trending and analysis

## **HEAT STRESS DISORDERS**

The following disorders are commonly associated with exposure to excessive heat. In the event that any of the following are observed or experienced, the symptoms should be immediately communicated to management or the immediate supervisor, and appropriate first aid measures will be taken.

### **1. Heat Cramps**

- Root Cause(s): Dehydration due to excessive sweating; imbalance of internal pH due to the loss of salt and other electrolytes through excessive sweating
- Signs and Symptoms: Cramping and painful spasms; excessive sweating
- Treatment: Drink water to replenish lost fluids; rest, and where possible, removal from area where the heat is excessive to a cooler area, or under shade; massage cramps

### **2. Heat Exhaustion**

- Cause: Dehydration due to excessive sweating; shock due to a failure to properly acclimatize to conditions.
- Signs and Symptoms: Excessive sweating; increased level of thirst; increased heart rate / rapid pulse; dizziness / fatigue / weakness; loss of consciousness (fainting / collapse)
- Treatment: Drink water to replenish lost fluids; rest lying down with legs elevated, and where possible, removal from area where the heat is excessive to a cooler area, or under shade

### **3. Heat Stroke**

- Cause: Extended / over-exposure to excessive heat
- Signs and Symptoms: Failure of ability to internally regulate temperature; temperature of worker continues to rise, even with addition of water, and removal from area with heat; excessive body temperature (above 98.6 degrees Fahrenheit); sweating has stopped; skin appears red, and is very hot and dry; heart rate is increased and pulse is rapid; breathing is laboured; worker is dizzy and/or disoriented; worker experiences fatigue and/or weakness; loss of consciousness
- Treatment: HEAT STROKE IS A MEDICAL EMERGENCY! Immediately call for help and contact emergency services (ambulance). Where possible, immerse the worker in water and ice in an effort to cool them down.

## **HEAT STRESS PREVENTION**

The following guidelines should be followed to prevent heat-related disorders:

Engineering Controls: Where possible, venting and/or air-conditioning shall be applied. Alternate methods will include the use of fans and opening of windows. For outdoor work, the Company shall work to ensure that a shaded area is available

Acclimatization: In an effort to avoid shock associated with exposure to heat, workers will be required to use appropriate acclimatization procedures to adapt them to new temperatures. This shall be accomplished by scheduling the worker to incrementally longer periods of exposure to heat over a period of 5-10 days

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Work Conditions: The Company’s managers/ supervisors will regularly check the weather conditions that will affect work, and will adapt the schedule(s) and tasks as appropriate

Work/Rest Cycles: Where possible, work requiring strenuous physical activity shall be scheduled for cool periods in the day (early morning or evening), and non-essential tasks will be re-scheduled until such time as the risk of injury or illness due to heat stress falls into an acceptable range. Scheduling of tasks will ensure that workers are rotated in a manner that allows for sufficient break periods in a cool and/or shaded area

Personal Protective Equipment: The Company employees required to perform work duties in hot environments will be directed to utilize appropriate lightweight / breathable garments that provide maximum protection against the sun, and potential health and safety hazards involved in both the work, and heat stress. Where work is performed outdoors, sun block will be recommended.

Fluid Intake: To minimize the danger of dehydration and other health risks associated with heat stress, the Company will ensure that workers are provided with access to water. Employees who perform work in areas with excessive heat are advised that the recommended intake of fluid is 250ml (one cup) per 20 minutes.

When heat-related illness hazards are present, the Manager will notify Supervisors at the beginning of the workday which of the following prevention actions they need to take with their employees that day. This list represents the equipment the Company will maintain and make available to employees according to weather conditions, work site locations, and the work being done:

- Water
- Ice
- Gatorade (or other sports replenishment drink) or powder mix
- Pedestal floor fans

**CRITERIA FOR MANAGING HEAT STRESS INDUCED BY HOT WEATHER**

- Humidex reaching or exceeding 35° C
- Environmental Humidex advisory (air temperature exceeding 30° C, and humidex exceeding 40° C,)
- Heat wave (three or more days of temperatures of 32° C, or more)

**Heat Index Chart(s)**

Relative Humidity %	Air temperature °C										
	21	24	27	29	32	35	38	41	43	46	49
0	18	21	23	26	28	31	33	35	37	39	42
10	18	21	24	27	29	32	35	38	41	44	47
20	19	22	25	28	31	34	37	41	44	49	54
30	19	23	26	29	32	36	40	45	51	57	64
40	20	23	26	30	34	38	43	51	58	66	
50	21	24	27	31	36	42	49	57	66		
60	21	24	28	32	38	46	56	65			
70	21	25	29	34	41	51	62				
80	22	26	30	36	45	58					
90	22	26	31	39	50						
100	22	27	33	42							

	Serious risk to health - heatstroke imminent
	Prolonged exposure and activity could lead to heatstroke
	Prolonged exposure and activity may lead to fatigue

## **TRAINING**

The Company will ensure that Managers / Supervisors are trained on the responsibility of the overall health and safety of employees under their direction, including appropriate management of heat stress prevention policy and procedures.

## **COMMUNICATION**

Any of the following method(s) may be used to communicate this policy:

- Company email
- Company memo
- Posting of policies and procedures
- Training
- Meetings and Safety talks

## **EVALUATION**

The Heat Stress Prevention program will be reviewed annually by the JHSC and Human Resources to ensure best practices are effective.

## **RESOURCES**

Canada - [https://www.ccohs.ca/oshanswers/phys\\_agents/max\\_temp.html](https://www.ccohs.ca/oshanswers/phys_agents/max_temp.html) (Temperature Conditions - Hot)

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## **Policy & Procedure: P234**

### **Subject: Preventative Maintenance**

#### **PURPOSE**

The purpose of this program is to prevent and control hazards by conducting regular maintenance on equipment, prior to deficiencies being identified, as well as when they are identified.

#### **SCOPE**

This procedure applies to all relevant equipment/machinery that has been identified for preventative maintenance; this includes any equipment/machinery that could lead to substantial injury/illness, property damage, or loss of production/service, if it breaks down or fails.

#### **POLICY**

The Company is committed to ensuring safe operation of facilities, equipment, vehicles, tools etc., to prevent injuries/illness, loss of equipment/facilities, and loss of productivity. It is imperative to identify equipment problems and deficiencies and correct the problem before it leads to an incident, injury/illness, or breakdown of equipment.

#### **DEFINITIONS**

**The “Company”** - FST Canada Inc., operating as various business entities.

**Preventative Maintenance** - Maintenance that is regularly performed on a piece of equipment to lessen the likelihood of it failing. Some examples include, but are not limited to cleaning, tests, lubrication, filter changes, oil changes, adjustments, repairs, inspecting for damage/malfunction, replacing parts etc.

**JHSC** – Joint Health & Safety Committee

#### **ROLES AND RESPONSIBILITIES**

The following responsibilities apply:

##### **Employer will:**

- Ensure that the requirements of this policy and procedure are carried out and the appropriate resources are allocated to do so
- Ensure that equipment, materials and protective devices as prescribed are provided and are maintained in good condition and are used in accordance with Legislation and Company policies
- Support the resolution of items identified as issues and hazards during preventative maintenance, by allocating resources to address these

##### **Manager will:**

- Identify delegated persons responsible for preventative maintenance, and ensure they are competent and appropriately trained to carry out their respective duties
- Ensure that relevant preventative maintenance is conducted as required and conforms to the requirements of procedure
- Maintain preventive maintenance records/documentation
- Ensure that relevant preventative maintenance by contractors/subcontractors is conducted and conforms to the requirements of procedure
- Assess health & safety considerations prior to purchasing new equipment, in collaboration with the role/department responsible for purchasing and procurement

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- Report any deficiencies/hazards identified, including information on corrective action taken, if applicable

**Employees will:**

- Report all equipment and maintenance-related health & safety hazards to their manager
- Participate in any health & safety training, as required
- Follow all applicable health & safety policies, procedures, and legislated duties as required

**Joint Health and Safety Committee (JHSC)/Health and Safety Members will:**

- Review this procedure annually, in conjunction with the JHSC/ HSR, providing any recommendations to Senior Management, as applicable

**HAZARDS**

The hazards likely to be encountered during your maintenance activities can be classified as follows:

**Safety Hazards**

- Mechanical
  - Equipment
  - Tools
- Electrical
  - Live equipment
  - Pneumatic
  - Hydraulic
  - Thermal
  - Combustion
- Working at Heights

**Health Hazards**

- Chemical Agents
  - Process chemicals
  - Cleaning solvents
  - Unexpected reaction products
  - Dust
- Physical Agents
  - Noise
  - Vibration

**Ergonomic Hazards**

- Biomechanical
  - Lifting, pushing, pulling (manual handling)
  - Stretching, lifting, pushing, pulling (manual handling)
- Work/ Process design
  - Poorly designed tools
  - Hard to access work locations

**PROCEDURE**

- The Manager, in conjunction with the Department(s) and/or role(s) responsible for the preventative maintenance of equipment; this could include, but not be limited to:
  - Mobile equipment (e.g., vehicles, backhoe, forklifts, lawnmowers etc.)
  - Production equipment
  - Heating, ventilation, air-conditioning (e.g., furnace, ducts, etc.)
  - Power equipment (e.g., Electrical, hydraulics, generators, pumps etc.)
  - Emergency equipment (e.g., smoke detectors, fire alarms, etc.)
  - Material handling equipment (e.g., cranes, hoists, racks/shelves, conveyors etc.)
  - Structural (e.g., stairs, ladders, scaffolding, guardrails, drainage etc.)
- Managers will be responsible for maintaining and updating equipment they have oversight of
- Those responsible for preventative maintenance of equipment will schedule maintenance on the equipment they are responsible for
- All records created from the preventative maintenance work will be maintained and reviewed regularly for any noted deficiencies and potential trends

All employees responsible for preventative maintenance will be properly trained on the steps to maintain the equipment they are responsible for, including training on specific controls, such as lock out tag out

**COMMUNICATION**

General communication of the preventive maintenance procedure may be made during related training programs, toolbox talks, staff meetings. Those who may be involved in the process will be made aware of their roles and responsibilities.

**TRAINING**

The Company will ensure that qualified employees who are required to inspect and maintain tools, equipment and vehicles are trained in the requirements of this program.

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Any of the following method(s) may be used to communicate this policy:

- Company email
- Company memo
- Posting of policies and procedures
- Training
- Meetings and Safety talks

### **RECORDS**

Keep records of all maintenance activities, indicating the machine(s) involved, the part(s) involved, type of maintenance and date on which performed will be kept by the Company for a minimum of 3 years.

### **EXHIBITS/FORMS**

- P207 Hazard Reporting
- P217 Powered Lift Truck Policy & Procedure
- P218 Powered Operated Equipment
- P219 Machine Guarding
- P220 Lock Out/Tag Out

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## **Policy & Procedure: P236**

### **Subject: Substance Use Policy**

#### **PURPOSE**

This policy is designed to establish expectations for reasonable behavior as it relates to the use of substances that could impact employees' ability to perform work duties safely, competently and efficiently, and to communicate the expectations and guidelines surrounding substance use, misuse and abuse.

#### **SCOPE**

This policy is applicable to all employees, contractors and visitors of FST Canada Inc. ("the Company").

#### **POLICY**

The Company is committed to providing a safe, healthy and productive workplace where employees, the contractors and visitors are protected from the adverse effects of impairment due to the consumption of substances, including but not limited to recreational cannabis, while in the workplace or while conducting company business. It is the expectation that employees are to perform their work duties safely, competently and efficiently, without any impairment due to the consumption of substances. Employees under the influence of substances on the job can pose serious health and safety risks to themselves, their fellow employees, and the general public.

It is the policy of the Company that:

- The use, possession, distribution or sale of drugs or alcohol during work hours, including during paid and unpaid breaks, is strictly prohibited.
- Employees are prohibited from reporting to work while under the influence of drugs or alcohol, other than medically prescribed cannabis; and
- Employees requiring the use of prescription medication or medically prescribed substances, including medical cannabis, must communicate to management or HR any potential risk, limitation, or restriction requiring modification of duties or temporary reassignment due to the use of medically required substances.

To help ensure a safe and healthy workplace, the Company reserves the right to prohibit certain items and substances from being present or brought on to Company premises.

#### **DEFINITIONS**

**The "Company"** - FST Canada Inc., operating as various business entities.

**Alcohol** – The intoxicating agent in beverages, including but not limited to, beer, wine, distilled spirits and very low alcohol products.

**Contractor** – Any person(s) providing services or goods to the Company under a contract or other agreement and who are not paid through the Company payroll system.

**Drug** – any substance, including illicit drugs, medication, recreational cannabis and medical cannabis, the use of which has the potential to change or adversely affect the way a person thinks, feels or acts.

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**Employee** – Any full-time, part-time, temporary or contract employee, any volunteer, student or intern worker.

**Fit for Duty** – An employee is able to perform the duties of the job with efficiency, competency and in a safe manner as compared to established or generally-accepted performance standards.

**Illicit Drugs** – Any drug or substance that is not legally obtainable by the employee and whose use, sale, possession, purchase or transfer is restricted or prohibited by Canadian Law (which may include but is not limited to street drugs such as cocaine, heroin, hallucinogens, stimulants), and includes prescription drugs that have not been lawfully prescribed to the employee.

**Impaired/Under the Influence/Unfit for Duty** – the inability to safely, competently or efficiently perform work duties without limitation resulting from the use, after-effects of, or otherwise being under the influence of drugs or alcohol.

**Medication** – A drug obtained legally, either over the counter or as properly prescribed by a registered and regulated health professional.

**Medical Cannabis** - Refers to the use of cannabis or cannabis, including constituents of cannabis, THC and other cannabinoids, as a physician-prescribed form of medicine or herbal therapy.

**Misuse of** – The intentional use of medication, drugs or alcohol in a way or for a purpose that was not intended or under circumstances that risk the health and safety of the employee, his/her co-workers and/or the workplace.

**Recreational Cannabis** – Up to 30 grams of dried cannabis, or its equivalent in non-dried form, possessed or used for recreational purposes. Only people of legal age limit are able to possess and use recreational cannabis. The use of recreational cannabis in the workplace is illegal.

**Substance Dependence** – A primary, progressive and chronic condition characterized by the regular, repetitive, habitual, compulsive, or obsessive use of a substance or a combination of substances.

**Safety-Sensitive Position** - a position which is occupied by an employee (whether on a temporary or permanent basis) and which has the potential, if carried out improperly, to result in a serious incident affecting the health and safety of employees, contractors, customers, the public and/or the environment.

**Workplace** – Any land, property, premises, location or thing at, upon, in or near which a worker works during the course of his or her duties, including but not limited to Company events held outside of Company premises.

## **ROLES AND RESPONSIBILITIES**

### **The Company will:**

- Firmly and fairly enforce the policy that its employees must not be impaired while at work or while conducting business on the Company’s behalf.
- Take all reasonable precautions to provide a safe work environment for employees.
- Review and update this policy on a regular basis.
- Clearly communicate expectations to employees regarding use, misuse and abuse of drugs and alcohol in the workplace.
- Take all reasonable steps to ensure that any employee medical information provided to the Company for the purpose of providing reasonable accommodation, including

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but not limited to prescription drug use information, is considered confidential and is treated as such; and

- Provide reasonable accommodation to employees per the Company’s Duty to Accommodate policy, including by providing a designated area for those prescribed medical cannabis in smoke-only format.

**Management will:**

- Communicate with employees about the need to maintain a workplace that is free from misuse of drugs and alcohol.
- Where an employee’s work performance has deteriorated or an employee’s actions jeopardize his or her own health and safety, the safety of others or the reputation of the Company, Managers and Supervisors are responsible for taking appropriate remedial action, including but not limited to, assessing whether the employee’s conduct is related to impairment due to use of drugs or alcohol.
- Encourage employees to self-disclose any conditions or concerns, including the use of drugs, alcohol, or substance dependence that might impair their job performance or compromise their or others’ health and safety.
- Encourage employees to advise Management if they have reasonable grounds to suspect that a co-worker is under the influence of drugs, alcohol, or has a substance dependence.
- Identify and address any situation where an employee appears to be Impaired/Unfit for work that could impact their ability to perform their job in a safe, competent and efficient manner.
- Prohibit without exception the operation of a motor vehicle and/or machinery by an employee who appears to be impaired/unfit for work.
- Ensure that any employee who discloses a substance dependence and seeks assistance is provided with the appropriate support (including accommodation) and is not disciplined for doing so; and
- Maintain confidentiality and employee privacy.

**Employees will:**

- Abide by the provisions of this policy and be aware of their responsibilities under it.
- While at work or representing The Company in a work capacity arrive fit for duty and able to perform their duties safely and to standard and remain fit for duty for the duration of their shift. This means being able to perform assigned duties safely, competently and productively without limitations due to the use of drugs or alcohol or the after-effects of the use of drugs or alcohol.
- When off duty, refuse a request to come into work, if unfit for duty; Employees are encouraged to self-disclose any conditions or concerns including the use of drugs, alcohol, or substance dependence that might impair their job performance or compromise their or others’ health and safety.
- Employees are encouraged to disclose any conditions or concerns including the use of drugs, alcohol, or substance dependence that might impair their job performance or compromise their or others’ health and safety; and
- Seek assistance where there may be a substance dependence that may impact their ability to be fit for duty.

**Human Resources will:**

- Maintain confidentiality and employee privacy.
- Facilitate and support the safe, healthy and productive return to work of an employee who requires accommodation due to substance dependence.
- Ensure that this Policy and its related Procedures are communicated and that all employees are trained with respect to its contents.
- Provide assistance with respect to Policy interpretation; and
- Maintain and update the Policy as needed.

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## PROCEDURE

- Employees must not attend work in a condition which renders them unfit for duty (either due to the use of alcohol, drugs, or otherwise).
- In all situations where the Company has reasonable grounds to suspect impairment in the workplace, an investigation will be conducted and documented to verify whether a policy violation has occurred before any corrective action is taken.
- The Company has the authority and discretion to remove from the workplace any employee who the Company has reasonable grounds to suspect is impaired or was involved in an incident due to impairment, pending the results of the investigation.
- The appropriate corrective action in all cases depends on the nature of the violation and the circumstances surrounding the situation. Some violations are considered sufficiently serious that immediate dismissal may be warranted on a first occurrence. Examples include, but are not limited to, trafficking or possession of illegal drugs on Company premises, consumption of beverage alcohol or illegal drugs on Company premises, while on Company business or when driving a Company vehicle or equipment.
- Any confirmed violation of this policy by an employee will result in progressive corrective action, with increasing severity depending on the seriousness of the violation, up to possible dismissal.

### Use of Medications and Medical Cannabis

Employees who know or suspect that they will be impaired and/or will not be fit for duty due to the effects of medication or medical cannabis may only consume the medication or medical cannabis on Company premises or in the course of their duties in the following circumstances:

- 1) The employee is medically required to take such medication or medical cannabis as a result of a medical condition; and
- 2) The employee advises his or her immediate manager that he or she is taking medication or medical cannabis, and that the employee's ability to carry out his or her duties may be affected.
- 3) The employee will be required to provide satisfactory medical confirmation that the employee is required to take the medication or medical cannabis, and the expected level of impairment or effect.
- 4) Accommodation requests to use medically required medications or medical cannabis while at work or when conducting business on the behalf of the Company may not be accommodated if the Employee is deemed to be in a safety-sensitive position. Alternative accommodations may be made, such as allowing the employee a leave of absence or providing the employee with alternative forms of work that do not engage safety concerns.
- 5) All employee medical information shall be kept confidential by the Company unless otherwise authorized by law.

### Voluntary Disclosure and Accommodation

- Employees are encouraged to communicate to management or HR if they have a substance dependence. Employees will not be disciplined for requesting help or due to current or past involvement in a rehabilitation effort.
- Any time an Employee requires accommodation due to substance dependence, the Company will make every reasonable effort to provide reasonable accommodation for the employee, up to undue hardship; and

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- All employee medical information shall be kept confidential by the Company unless otherwise authorized by law.

**Suspicion of Impairment**

The following procedure will be enacted if there is reasonable belief that an employee is impaired by substance use at work:

If possible, the employee's manager/supervisor will first seek another manager/supervisor's opinion to help establish whether an employee appears to be impaired. The use of the Reasonable Cause Checklist should be used to help determine, if any the level of impairment present.

- 1) The manager/supervisor will consult privately with the employee to discuss the findings of the observations. Suspicions of an employee's ability to function safely may be based on specific personal observations and/or criteria established by the Company. If the employee exhibits unusual behavior including, but not limited to, slurred speech, difficulty with balance, watery and/or red eyes, dilated pupils, and/or there is an odor of alcohol or drugs, the employee should not be permitted to return to their assigned duties in order to ensure their safety and the safety of other employees or visitors to the workplace.
- 2) If an employee is considered impaired and deemed "unfit for work" this decision is made based on the best judgment of two members of management making independent assessments. It DOES NOT require a breathalyzer or blood test. The employee will be advised that the Company has arranged a taxi or shuttle service to safely transport them to their home address or to a medical facility, depending on the determination of the observed impairment. The employee may be accompanied by a manager/supervisor or another employee if necessary.
- 3) An employee who the Company has reasonable grounds to believe is impaired will not be allowed to drive. The employee will be advised that if they choose to refuse this organized transportation and make the decision to drive their personal vehicle, the Company is obligated to and will contact the police to make them aware of the situation.
- 4) A meeting will be scheduled for the following workday to review the incident and determine a course of action, which may include a monitored program.
- 5) If an employee is sent home due to suspected substance impairment, the hours missed will be paid.

**Continuing Employment or Reinstatement Following Policy Violation**

Depending on the circumstances, and subject to the Company's duty to provide reasonable accommodation, employees may be permitted to continue their employment with the Company. Such employees will be advised of the conditions governing their continued employment, which may include, where appropriate, the following:

- Assessment by a substance abuse professional.
- Completion of any recommended treatment and compliance with medically recommended relapse prevention programs after treatment.
- No further policy violations.
- Maintenance of job performance according to expectations; and/or
- Ongoing assessment and confirmation of medical fitness for duty for safety sensitive positions.

**Disciplinary Action**

The Company may impose a full range of disciplinary sanctions for breach of this policy, up to and including immediate termination of employment for cause. The Company will take into account any substance dependencies disclosed by an employee when considering what disciplinary action (if any) may be appropriate in the circumstances.

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Subject to the Company’s duty to provide reasonable accommodation where justified and appropriate, employees will be subject to disciplinary action, up to and including termination of employment for failure to adhere to the provisions of this policy, including, but not limited to:

- Failure to meet prescribed safety standards as a result of impairment; and
- Engaging in illegal activities (e.g., selling drugs and/or alcohol while on Company premises).

**TRAINING**

Any of the following method(s) may be used to communicate this policy:

- Company email
- Company memo
- Posting of policies and procedures
- Training
- Meetings and Safety talks

**REFERENCES**

Acknowledgement For F235.1 – Reasonable Cause Checklist

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**Acknowledgement and Agreement**

By signing below, I acknowledge that I have read and understand the contents of the Substance Use policy. I agree to adhere to this policy and will ensure that employees working under my direction adhere to this policy. I understand that if I violate the rules set forth in this policy, I may face disciplinary action up to and including termination of employment.

Print Name: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

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## Reasonable Cause Checklist - F236.1

<input type="checkbox"/> Employee is reporting for duty	<input type="checkbox"/> Employee is already on duty
Employee Name:	Branch:
Date of Observation:	Time of Observation: From _____ a.m./p.m To _____ a.m./p.m _____

### A. Physical Signs

<b>Speech (check one)</b> <input type="checkbox"/> normal <input type="checkbox"/> abnormal (if "abnormal" check any options below that describe the abnormal			
<input type="checkbox"/> Soft	<input type="checkbox"/> Loud	<input type="checkbox"/> Mumbled <input type="checkbox"/> Slurred	<input type="checkbox"/> Other -Specify:
<b>Breath (check one)</b> <input type="checkbox"/> normal <input type="checkbox"/> abnormal (if "abnormal" check any options below that describe the abnormality)			
<input type="checkbox"/> Faint alcohol odor	<input type="checkbox"/> Faint cannabis odor	<input type="checkbox"/> Having difficulties breathing	
<input type="checkbox"/> Moderate alcohol odor	<input type="checkbox"/> Moderate cannabis odor		
<input type="checkbox"/> Strong alcohol odor	<input type="checkbox"/> Strong cannabis odor		
<b>Cannabis odor on clothing (check one)</b> <input type="checkbox"/> no cannabis odor <input type="checkbox"/> cannabis odor detected (if "abnormal" check options below that describe the abnormality)			
<input type="checkbox"/> Faint cannabis odor	<input type="checkbox"/> Moderate cannabis odor	<input type="checkbox"/> Strong cannabis odor	
<b>Eyes (check one)</b> <input type="checkbox"/> normal <input type="checkbox"/> abnormal (if "abnormal" check any options below that describe the abnormality)			
<input type="checkbox"/> Bloodshot	<input type="checkbox"/> Dilated Pupils	<input type="checkbox"/> Fixed Pupils	<input type="checkbox"/> Glassy <input type="checkbox"/> Heavy Eyelids
<b>Skin (check one)</b> <input type="checkbox"/> normal <input type="checkbox"/> abnormal (if "abnormal" check any options below that describe the abnormality)			
<input type="checkbox"/> Flushed	<input type="checkbox"/> Pale	<input type="checkbox"/> Excessively sweating	
<b>Balance while stationary</b> <input type="checkbox"/> normal <input type="checkbox"/> abnormal (if "abnormal" check any options below that describe the abnormality)			
<input type="checkbox"/> Falling	<input type="checkbox"/> Swaying	<input type="checkbox"/> Wobbling	<input type="checkbox"/> Needs Support
If the employee has fallen, please specify how many falls occurred and the nature of the falls: Employee explanation			
<b>Movement</b> <input type="checkbox"/> normal <input type="checkbox"/> abnormal (if "abnormal" check any options below that describe the abnormality)			
<input type="checkbox"/> Falling	<input type="checkbox"/> Swaying	<input type="checkbox"/> Stumbling	<input type="checkbox"/> Staggering <input type="checkbox"/> Needs support
If the employee has fallen, please specify how many falls occurred and the nature of the falls: Employee explanation (if any):			

<b>Overall physical appearance</b> <input type="checkbox"/> normal <input type="checkbox"/> abnormal (if "abnormal" check any options below that desc the abnormality)
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<input type="checkbox"/> Shaking or trembling	<input type="checkbox"/> Clothing not properly worn (not properly buttoned, worn inside- out)
<input type="checkbox"/> Clothing disheveled	<input type="checkbox"/> Appears recently injured (e.g., has a “black eye” or visible cut)
<input type="checkbox"/> Poorly groomed	<input type="checkbox"/> Sudden change in appearance following a break
<input type="checkbox"/> Inappropriate clothing	<input type="checkbox"/> Other - Specify

**B. Behavioral Signs**

<b>Has the employee exhibited any of the following behaviors at the workplace without known or reasonable explanation</b> (check all that apply)		
<input type="checkbox"/> Hiccapping	<input type="checkbox"/> Vomiting	<input type="checkbox"/> Excessive trips to the washroom
<input type="checkbox"/> Belching	<input type="checkbox"/> Crying	<input type="checkbox"/> Sudden personality change
<input type="checkbox"/> Drowsiness		
Employee explanation for behavior (if any):		
<b>Has the employee exhibited any of the following misconduct at the workplace</b> (check all that apply)		
<input type="checkbox"/> Fighting	<input type="checkbox"/> Excessive unexplained absenteeism	
<input type="checkbox"/> Inappropriate language	<input type="checkbox"/> Causing an accident or near accident	
<input type="checkbox"/> Failure to respect safety procedures	<input type="checkbox"/> Repeated failure to follow instructions or operating procedures	
<input type="checkbox"/> Other – Specify		
Employee explanation for behavior (if any):		

**C. Cognitive/Emotional Signs**

<b>Does the employee know where they are?</b>	<input type="checkbox"/> Check if “no”
<b>Does the employee know what day it is?</b>	<input type="checkbox"/> Check if “no”
<b>Does the employee know what time it is?</b>	<input type="checkbox"/> Check if “no”
<b>Is the employee having difficulties with memory?</b>	<input type="checkbox"/> Check if “yes”
<b>Does the employee appear abnormally <u>unfocused</u> at the workplace?</b>	<input type="checkbox"/> Check if “yes”
If yes, please describe: Employee explanation for behavior (if any):	
<b>Does the employee appear abnormally <u>confused</u> at the workplace?</b>	<input type="checkbox"/> Check if “yes”
If yes, please describe: Employee explanation for behavior (if any):	
<b>Does the employee appear abnormally <u>distressed</u> at the workplace?</b>	<input type="checkbox"/> Check if “yes”
If yes, please describe: Employee explanation for behavior (if any):	
<b>Does the employee appear abnormally <u>irritable</u> at the workplace</b>	<input type="checkbox"/> Check if “yes”
If yes, please describe: Employee explanation for behavior (if any):	



<b>Does the employee appear abnormally <u>nervous</u> at the workplace?</b>	<input type="checkbox"/> Check if "yes"
If yes, please describe: Employee explanation for behavior (if any):	
<b>Does the employee appear abnormally <u>manic</u> at the workplace?</b>	<input type="checkbox"/> Check if "yes"
If yes, please describe: Employee explanation for behavior (if any):	
<b>Does the employee appear abnormally <u>excited</u> at the workplace?</b>	<input type="checkbox"/> Check if "yes"
If yes, please describe: Employee explanation for behavior (if any):	
<b>Does the employee appear abnormally <u>combative</u> at the workplace?</b>	<input type="checkbox"/> Check if "yes"
If yes, please describe: Employee explanation for behavior (if any):	
<b>Is the employee exhibiting <u>any other</u> abnormal cognitive or emotional, pattern at the workplace?</b>	<input type="checkbox"/> Check if "yes"
If yes, please describe: Employee explanation for behavior (if any):	

**D. Direct Evidence of Unauthorized Workplace Drug or Alcohol Use**

<b>Do any of the following apply to the employee?</b>
<input type="checkbox"/> Found in unauthorized possession of alcohol
<input type="checkbox"/> Found in unauthorized possession of cannabis
<input type="checkbox"/> Found in unauthorized possession of another impairment-causing substance
<input type="checkbox"/> Found in unauthorized possession of drug paraphernalia
<input type="checkbox"/> Admitted to unauthorized use of alcohol, cannabis, or other impairment-causing substance
<input type="checkbox"/> Received a report of alcohol/drug use. (If yes, provide detail below and attach statements from sources)

**E. Manager or Supervisor Statement Following Observation**

Based on the assessment above, the employee appears to be impaired due to alcohol or other drug use. <input type="checkbox"/> Yes <input type="checkbox"/> No	
Comments	
1) Signature of Manager or Supervisor:	Date:
2) Signature of Manager or Supervisor:	Date: