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HEALTH AND SAFETY POLICY STATEMENT

The employer and employees of ComFact Corporation (hereafter ComFact) are vitally interested in the health and safety of its workers. Protection and safety of all workers from injury or occupational disease is a continuing objective with us.

ComFact will make every effort to provide a safe and healthy work environment. All employers, supervisors and employees must be dedicated to the continuing health and safety objective of reducing risk of injury.

ComFact Corporation as employer, is responsible for worker health and safety. We give our personal commitment that ComFact's management, staff and employees will comply with the duties under the Act, such as taking every reasonable precaution for the protection of workers in the workplace.

Supervisors will be held accountable for the health and safety of workers under their supervision. Supervisors are subject to various duties in the workplace, including the duty to ensure that all machinery and equipment are updated and safe, and that workers work in compliance with established safe work practices and procedures.

Every employee must protect his or her own health and safety by working in compliance with the law and safe work practices and procedures established by the employer.

Employees will receive information, training and competent supervision in their specific work responsibility to protect their health and safety.



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It is in the best interests of all parties to consider health and safety in every activity. Commitment to health and safety must form an integral part of this company, from management to employees.

Dated August 20, 2018



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ABSENCE OF COMFACT CORPORATION SUPERVISION

*In circumstances on the sites where ComFact Corporation does not provide a foreman and/ or a lead hand to their employees, ComFact employees will follow and oblige to the Contractor's supervision, health and safety plan and emergency procedures. The ComFact employee will work under the supervision and guidance of the Contractor. When ComFact supplies a foreman or lead hand the employee will be informed and their contact number will be listed on the ComFact employee contract.**



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SECTION 1 RESPONSIBILITIES

Under the *Occupational Health and Safety Act (OHSA)*, responsibilities of ComFact include:

1. Ensuring equipment, materials and protective devices are used properly and in a safe manner.
2. Providing updated information, instruction and supervision to employees to protect their health and safety.
3. Appointing competent supervisors (Competence is based on supervisor's knowledge, training and experience to organize the work and its performance; supervisor is familiar with the *OHSA* and regulations that apply to the work, and has knowledge of any potential or actual danger to health and safety in the workplace.) **In the absences of ComFact direct supervision please refer to "Absence of ComFact Supervisor" page 3.*
4. Providing (upon request), in a medical emergency, information in the possession of the employer, including confidential business information to a legally qualified medical practitioner, and to such other persons as may be required under law.
5. Acquainting an employee or an individual in authority over an employee with any hazard in the workplace and in the handling, storage, use, disposal and transport of any article, device, equipment or a biological, chemical or physical agent.
6. Affording assistance and cooperation to the health and safety representative in carrying out their functions.
7. Only employing an individual if he or she is the prescribe age.



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8. Taking all proper and reasonable precautions in the circumstances for the protection of an employee.
9. Provide a copy of the Incident Report 1 or 2 to the Contractor's health and safety representative. ComFact must also advise employees of the results of a report and, if the report is written, make available to them upon request.
10. Assuring a copy of ComFact's health and safety policy and pertinent regulations are accessible to employees on workplace location.

Development and maintenance of all health and safety responsibilities and practices to implement ComFact Corporation's health and safety policy.



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MANAGEMENT HEALTH AND SAFETY RESPONSIBILITIES

Under the *Occupational Health and Safety Act (OHS)*, ComFact managers are required to ensure:

1. Employees work in the manner and with the protective devices, measures and procedures required by the *OHS* and regulations. For example, fall arrest systems, confining hair, jewellery or loose and unsafe clothing around moving machinery, etc.
2. Employees use or wear the equipment, protective devices or clothing that ComFact requires to be used or worn for their health and safety.
3. Employees are advised of the existence of any potential or actual danger to health and/ or safety of which the manager is aware.
4. Employees are provided with instructions as to the measures and procedures to be taken for their protection.
5. Every reasonable precaution is taken for the protection of an employee.

Other requirements include:

- Develop and demonstrate a positive health and safety attitude and working environment.
- Be interested and knowledgeable in ComFact's Health and Safety Policy, ComFact's Workplace Safety, Violence and Harassment Policy, the Workplace Safety and Insurance Act and regulations, and all applicable legislation.
- Make and take every reasonable attempt and/ or measure to resolve the health and safety concern of employee.



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- Ensure any injury or illness resulting in loss of time or requiring medical care beyond basic first aid is reported and investigated. The results are reviewed and analyzed to determine probable cause.
- Ensure any occurrence of property damage, fire, explosion, or any occurrence classified as a near accident with potential to cause property damage, fire or explosion, or personal injury or illness is investigated. The investigated results are reviewed and analyzed to determine probable cause.
- Correct unsafe acts and unsafe conditions.

Ensure regular contact is maintained with injured or ill employee to assess their recovery and/ or rehabilitation. Appropriate modified duties may be provided to the employee at the earliest opportunity.



FOREMAN AND LEAD HAND HEALTH AND SAFETY RESPONSIBILITIES

Under the *Occupational Health and Safety Act (OHSA)*, ComFact foreman and/ or lead hand are required to ensure:

1. Employees work in the manner and with the protective devices, measures, and procedures required by the *OHSA* and regulations. For example, fall arrest systems, confining hair, jewellery or loose and unsafe clothing around moving machinery, etc.
2. Employees use or wear the equipment, protective devices, or clothing that ComFact requires to be used or worn for their health and safety.
3. Employees are advised of the existence of any potential or actual danger to health and/ or safety of which the supervisor is aware.
4. Employees are provided with current written instructions as to the measures and procedures to be taken for their protection.
5. Every reasonable precaution is taken for the protection of an employee.

Other requirements include:

- Be knowledgeable in ComFact's Health and Safety Policy, ComFact's Workplace Safety, Violence and Harassment Policy, the Workplace Safety and Insurance Act and regulations, and all applicable legislation.
- Enforce the standards above and take appropriate disciplinary action in the circumstance to achieve and maintain health and safety compliance.
- Ensure every employee under his or her supervision works safely under *OHSA* and ComFact's Health and Safety Policy.



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- Conduct regular safety inspections in their area of supervision and take immediate reasonable actions to rectify the unsafe condition or practice observed, and provide a written report of their inspection and actions taken.
- Ensure any injury or illness are immediately investigated to determine probable cause and ensure proper corrective measures are taken.
- Advise any employee the potential hazards or hazards on work site.
- Ensure that any ComFact visitors are informed of the required health and safety regulations and standards. *(Please refer to Visitor's Health and Safety Responsibilities)*



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EMPLOYEE HEALTH AND SAFETY RESPONSIBILITIES

Under the *Occupational Health and Safety Act (OHSA)*, ComFact employee are required to ensure:

1. Work in compliance with the provisions of the *OHSA* and regulations.
2. Use and/ or wear the appropriate equipment, protective devices, or clothing that ComFact requires to be used or worn as an employee.
3. Report to his or her foreman the absence of or defect in any equipment or protective device of which the worker is aware and which may endanger him or herself or another employee.
4. Report to his or her foreman on any contravention of the *OHSA*, regulations, ComFact' s policy and program.
5. Report to his or her supervisor the existence of any hazard of which he or she is aware.
6. Not removing or making ineffective any protective device without providing an adequate temporary protective device. Replacing immediately the original protective device when the work is completed.
7. Not using or operating any equipment, machine, device, or working in any manner that may endanger him or herself or another employee.
8. Never engage in any prank, contest, and feat of strength, unnecessary running, or rough and boisterous conduct.

Other requirements include:

- o Be knowledgeable in ComFact's Health and Safety Policy, ComFact's Workplace Safety, Violence and Harassment Policy, the Workplace Safety and Insurance Act and regulations, and all applicable legislation.



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- Not work in any manner that may endanger him or herself.
- Not under the influence of any illegal substance which would impair the employee's ability to work safely.
- Immediately report any injury or illness to his or her foreman and obtain immediate medical attention.
- Immediately report to his or her foreman any unsafe condition or practice observed.
- Inform his or her foreman of any pre-existing or underlying condition that may increase the employee's potential for injury or illness.
- Maintain his or her work area in an organized and tidy manner.



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VISITOR'S HEALTH AND SAFETY RESPONSIBILITIES

Under the *Occupational Health and Safety Act (OHSA)*, ComFact visitors are required to ensure:

1. Work in compliance with the provisions of the *OHSA* and regulations.
2. Use and/ or wear the appropriate clothing and protective gear that ComFact requires to be used or worn as a visitor for the duration of their time on site.

Other requirements include:

- Upon arriving on site, the visitor must inform the foreman of your presence and reason for visit.
- An employee of ComFact should accompany any visitor at all times unless they will be at a specified work location for the duration.

Additional information:

- Any visitor without the appropriate clothing and protective gear will be refused entry on to site.



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SECTION 2 INJURY PROTECTION

HEAD PROTECTION

All employees must wear CSA approved safety hard hat at all times while on the job site.

FOOT PROTECTION

All employees must wear CSA certified boots with heavy duty toe and sole protection at all times.

EYE PROTECTION

All employees must wear safety glasses or goggles at all times while on the job site.

EAR PROTECTION

Appropriate hearing protection must be worn when an employee is exposed to continuous noise at his or her work area.

WORKPLACE HAZARDOUS MATERIAL INFORMATION SYSTEM (WHMIS)

Employees must wear appropriate protective clothing or device while handling hazardous materials as per the Material Safety Data Sheet (MSDS) information for all products on the job site.

FALL PROTECTION

All employees must wear safety harness and lanyards when working at heights. All safety harnesses and lanyards must be CSA certified and must be worn with all hardware and straps intact and properly fastened.

SAFETY VIOLATIONS

As per ComFact's policy, progressive disciplinary actions will be taken for all infractions that violate the regulations in the *OHS*A.

JOB SITE SAFETY

Instruction is provided to all employees in a clear, concise manner on all production and safety aspects of the job when assigning tasks.



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All job site accidents are fully investigated as per ComFact Incident Report 1 and 2, and Correction and Prevention Report is completed.

The workplace should be clean, good housekeeping is maintained, and equipment, machinery and tools are maintained in good condition.



SECTION 3 ACCIDENT PREVENTION

LADDERS

Standard manufacturing specifications exist for most types of ladders. CSA Standard Z11 sets out standard requirements for manufacturing portable ladders. The most common materials for ladders are aluminum, wood, steel, and fibreglass reinforced plastic.

- **Portable ladders**
Straight, extension, sectional, or hooked ladders must have non-slip feet or be set up that the feet will not move. For general construction applications, heavy duty portable ladders are recommended. When a task can only be done while standing on a portable ladder, the length of the ladder must be such that the employee stands on a rung no higher than the fourth from the top. The ladder should also be tied off or equipped with a suitable stabilizer.
- **Step, trestle and platform ladders**
The primary consideration with these ladders is their spreader arms that lock securely in the open position.
- **Fixed ladders**
They are permanently fixed to structures and are often used by employees during construction. If the ladders are vertical and more than 5 meters long, safety belts and life lines or safety belts and channel lock devices must be used by employees when using these ladders.
- **Job built wooden ladder**
Must be placed on firm footing and be securely fastened in position. They should be inspected daily. If defective they must be repaired immediately or taken out of service and destroyed.
- **Proper ladder angles**
1 foot out for every 4 feet up.



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- Ladders must not be erected on boxes, carts, tables, scaffold platforms, man lift platforms or vehicles under any circumstances.
- Employees must always face the ladder when climbing up or down.
- Metal ladders or ladders with metal reinforcing must not be used near energized electrical conductors.
- Ladders are never to be used horizontally as substitutes for scaffolding planks or for any service for which they have not been designed.
- Two feet and one hand, one foot and two hands must be in contact with a ladder when climbing up and down.
- Employees must never straddle the space between a ladder and another object.
- Employees should be instructed and frequently reminded to keep their footwear free of mud, snow, grease, or other slippery material when using ladders.
- Short ladders must never be spliced together to make a longer ladder.
- Ladders must not be set up in passageways, doorways or driveways unless suitable barricades have been erected.
- Tools or materials must not be carried up or down a ladder.



SCAFFOLDS

- Erecting and dismantling
A frequent number of scaffold related injuries are caused from erecting and dismantling.
The most common problem is failure to provide an adequate working platform to install the next lift of scaffold. Working from one or two planks is not recommended. The next important consideration is the erection of all components, including tie-ins, as assembly progresses. Failure to do so makes the scaffold less stable.
- Climbing up and down
Another frequent number of scaffold related injuries occur when an employee is climbing up and down. Adequate ladders must be provided to overcome this problem. Additionally, proper climbing techniques using 3 point contact are required. Climbing up and down braces is a frequent cause of accidents.
- Planks sliding off or breaking
Any scaffold planks that are uncleated or otherwise unsecured will easily slide off. Planks also break occasionally. It is important to use proper grades of lumber and to inspect planks before erection. Do not overload as this could cause scaffold planks to break.
- Platforms not fully decked
It is strongly recommended that scaffold platforms always be fully decked in. Where this is not possible, people on the platform should be tied off to a secure anchorage using a fall arrest system.
- Platforms without guards
Guardrails are recommended for all scaffold platforms over 5 feet high during normal use.
- Failure to install all required components
Base plates, braces, and proper securing devices are frequently omitted. All components provided must be used for a safe scaffold. Parts should be installed as scaffold erection progresses.



- Rolling scaffolds

While moving rolling scaffold with employees on the platform in the situation where it is impractical for employees to climb down and the scaffold is over 10 feet in height, each employee must be tied off with a safety belt and lanyard to a solid structure other than the scaffold. Before moving the rolling scaffold, you must advise the foreman and check the route carefully to ensure no overhead wires are in the vicinity.

Minimum distance from live power lines

Voltage rating of power line	Minimum distance
300-150,000 volts	3 meters
150,001-250,000 volts	4.5 meters
Over 250,000 volts	6 meters

- Guardrails

Consisting of a top rail, mid rail, and toe board must always be proofed around work platforms on all scaffolds, floor openings, ramps, roofs and open areas, wherever a fall of 10 feet is possible. When guardrails are not in place, workers must be protected by a safety harness and lanyard tied off. Barricades and covers must be replaced immediately after the work is completed.

MOBILE ELEVATED WORK PLATFORMS

An employee will be required to use, operate or control various mobile elevated work platforms including

- Vehicle mounted aerial platform (bucket truck)
- Self-propelled elevated work platform (scissors lift)
- Boom type elevating work platform (boom lift)
- Materials handling equipment on work site

Under the Canada Occupational Health and Safety Regulations (COHSR) it is a requirement for ComFact to ensure they will have the training in fall protection system training to any employee working from an unguarded structure or a vehicle, at a height of more than 2.4 meters above the nearest permanent safe level.



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The Ministry of Labour (MOL) outlines safe practices and procedures to use, operate or control mobile elevated work platforms.

- Equipment should be inspected each time before use
- Fall Protection
 - Guardrail must be augmented by a fall arrest or travel restraint system attached to the platform or device.
 - The device cannot be in movement without full body harness and lanyard attached to specified points on the platform.
 - While working on the device, an employee must use CSA approved harness fall arrest system consisting of a full body harness or 5 point harness with lanyard.
 - Lanyard shall be attached to any mobile elevated work platforms prior to movement.
 - Never tie off to an adjacent structure or equipment while working from the basket or platform.
- Ground stability should be tested and confirmed
 - Equipment should only be operated on firm level surface of withstanding weight.
- The travel path should be clear of all hazards (such as ditches, drop offs, holes, bumps, debris or any other potential obstructions).
- Employees are not to use mobile elevating platforms in extreme weather.
- Never sit or climb the guardrail of the basket or platform.
- Never climb up to an already elevated platform.
- If any function is not working as expected the mobile elevating device should be rendered out of service and the foreman should be informed.



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ACCESS TO WORK AREAS

When work areas are above or below ground, access to and access from the work area must be provided and maintained in a safe condition in accordance with the regulations under the *OHSA*.

LIGHTING

Stairs and work area should be adequately lit at all times. The foreman should be notified if adequate light or lighting is not provided.

***If you require further information or have questions please contact the ComFact office*



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SECTION 4 **FIRE PREVENTION**

- Precautions must be taken to prevent a fire outbreak, especially where welding and cutting takes place.
- Fire extinguishers must always be readily accessible, properly maintained, regularly inspected and properly refilled after use.

SECTION 5 **TRAFFIC CONTROL**

- Danger areas should be barricaded.
- A signal person is needed around heavy trucks and equipment especially where trucks are required to back up. This employee should wear a high visibility fluorescent vest.
- Keep trucks close to cranes to avoid overreaching by the crane.
- Keep trucks as level as possible and clear of overhead power lines.
- Truck wheels should not be blocked or chocked during unloading.
- Scrape off soles of footwear when climbing in to truck. Never place feet on wheels or tires. Climb facing truck and maintaining a 3 point contact.
- Try to be visible to the crane operator at all times.
- Starting system must be inoperative or locked when heavy equipment is not in use.

SECTION 6 **JOB SITE HOUSEKEEPING AND STORAGE**

- Materials and equipment should be transported, piled, moved and stored in safe manner.
- Waste material and debris should not be thrown from one level to another and not left in areas of access including doors, hallways, etc.
- Material to be lifted by crane must not be stored under overhead power lines.

SECTION 7 **MATERIAL HANDLING**

- Wherever practical, heavy lifts should be done with mechanical lifting devices.
- When manual handling is required, dollies, trucks and similar devices should be used.



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- Employees should be encouraged to get help when a lifting task may be more than they can safely handle.
- Employees should practice safe lifting procedures, taking a balanced stance, squatting to pick up load, testing the weight prior to lifting, facing the direction they will be moving (avoid twisting) and lifting the load smoothly and gradually.

SECTION 8 **FIRST AID**

- In an emergency avoid panic, stay calm, and be prepared to make do with whatever is at hand.
- Weigh the risks. Sometimes there is absolutely no safe way. You may have to take one risk to avoid a greater risk. Picking the most advantageous procedure requires clear understanding and calm thoughts.
- Have someone call 911 immediately while the Health and Safety representative or someone with first aid knowledge applies assistance.
- First aid stations and kits will be identified to employees at orientation on site.



SECTION 9 SAFE WORK PRACTICES

LIFTING

Construction involves a lot of manual lifting. An employee will be lifting material and equipment regularly at the workplace. ComFact is committed to a safe workplace and any employee lifting should follow lifting procedures to avoid physical injury and/ or musculoskeletal disorders (MSDs).

Following the procedures from Infrastructure Health and Safety Association (IHSA):

- Avoid lifting above shoulder height, this can cause your back to arch and put a lot of stress on your shoulder and spine.
- Don't try to catch falling objects, your muscles may not have time to coordinate properly to protect your spine.
- Push rather than pull, while pushing you maintain normal curves in your back.
- Get to the load as close as possible.
 - Lifting capacity is reduced if you are further away from the load.
- Be in the best position for the lift.
 - ALWAYS avoid twisting from the waist, reaching out and leaning over the load.
- Take a well-balanced stance with one foot slightly ahead of the other.
- Tighten your stomach muscles as you start to lift.
- Keep lower back in its normal curved position and use your legs to lift.
- Pick up your feet and pivot to turn. DO NOT twist lower back.
- Lower the load and maintain the curve in your lower back.

Plan to safely lift

- Size up the load.
- Make sure the path is clear.
- Ask for help if you need it.
 - Two person lift
 - Partners should be roughly the same height.



- Before lifting figure out the type of lift to handle the load, who will lead and how they will lower the load.
- Use a dolly or other material handlers to move the load.

GRINDING MACHINERY

An employee could be required to use a grinding wheel, grinder, or a portable grinder. ComFact is committed to a safe workplace and any employee grinding should follow safety procedures before, during, and after grinding to maintain a safe workplace.

Following the procedures from the Canadian Centre for Occupational Health and Safety and IHSA:

- Always wear safety glasses or goggles, or a face shield (with safety eye wear) to protect against flying particles.
- Wear CSA approved hearing protection
- Guards must be provided and adjusted to protect you.
- Replace any damaged guards.
- Ensure the floor around the work area is clean.
- Check the tool rest for correct distance from the abrasive wheel (maximum 1/8" or 3 mm).
- Replace the grindstone when adjustment of the rest cannot provide 1/8" or 3 mm clearance.
- If the wheel has been abused and ground to an angel or groove, reface the wheel with the proper surfacing tool or replace the wheel.
- When replacing the grind wheel check the maximum approved speed (stamped on wheel bladder) against the shaft rotation speed of the machine to ensure safe speed is not exceeded.
- DO NOT use wheels that are cracked or excessively vibrate.
- Do not operate grinding wheel exceeding speed of manufacturer's recommendation.
- The flanges supporting the grinding wheel should be maximum 1/3 the diameter of the wheel. It must fit the shaft rotating speed according to the manufacturer's recommendation.
- Bench grinders are for peripheral grinding. Do not grind side of wheel.
- Use both hands when holding the grinder.



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Portable Grinders

Proper storage, use, and maintenance of wheels must be used at workplace. Failure to comply with safe work practices can cause severe injuries.

- Always wear safety glasses or goggles, or a face shield (with safety eye wear) to protect against flying particles.
- Wear CSA approved hearing protection.
- Familiarize yourself with the grinding operation before working.
- Check that grinder does not vibrate or operate roughly.
- Use racks or hooks to properly store portable grinders.
- Stand away from the wheel when starting grinders.
- Inspect for cracks or defects and do not use if found.
- Ensure guards are in place.
- Ensure mounting flange surfaces are clean and flat.
- Never exceed the maximum wheel speed.
- Do not use grinders near flammable materials.
- Never use grinders for jobs it is not designed for.



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SECTION 10 RIGHT TO REFUSE UNSAFE WORK

This is the legal right of every worker. ComFact is committed to ensuring a safe workplace. If an employee feels the situation or responsibility is unsafe he or she should inform the foreman or ComFact manager immediately. Do not progress with the duties, if you do not feel safe.

- If you have any health and safety concerns or concerns related to violence, bring them to the attention of your foreman or ComFact manager.
- If you believe your health and safety may be endangered by the physical condition of the workplace or by any equipment or machine you are to use or operate or any situation related to violence- YOU have the right to refuse unsafe work.

Procedure

- Immediately report the refusal and your reasons to the foreman and/ or ComFact manager.
- The foreman will notify the ComFact manager if he or she has not been informed and the manager will investigate your concern.
- The investigation will be conducted with the employee, foreman, and manager.



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SECTION 11 INJURY AND ILLNESS INCIDENT INVESTIGATION

To provide a procedure where all incidents can be investigated to prevent recurrence. Incidents are:

- Injuries
- Occupational illness
- Property damage
- Near misses

When to Investigate:

- Immediately when discovered or reported.
- After an injury or ill employee has been given first aid.
- No later than 24 hours after incident has occurred.

Responsibilities:

1. Employees are required to report all injuries, illnesses, property damage and/ or incident to his or her foreman immediately.
2. The foreman will investigate, report, and take corrective action. A follow up of injury, illness, property damage and/or incident will also be reported to the ComFact manager.

Procedure:

1. Foreman shall contact the ComFact office and report the incident in a timely manner.
2. Immediately after an injury, illness, property damage and/ or incident he or she shall ensure the safety of all employees, equipment, and facilities from further injury or damage.
3. Four categories of injuries
 - a. No treatment
 - b. First aid
 - c. Health care
 - d. Critical injury (must contact the ComFact office as soon as possible)

In all cases of accidents, injuries, illnesses, property damages and/ or incidents, the foreman shall complete an Incident and Accident Report.



A. No treatment

- i. A 'no treatment injury' occurs when there is an injury that does not require any treatment. For example, a bruised finger.
- ii. The employee will report the injury to their foreman.
- iii. The foreman will record the injury on the Incident Report 1 or 2 and send the completed copy to the ComFact office.

B. First Aid Injury

- i. A 'first aid injury' is an injury that can be treated at the work site and does not require treatment from a health care professional. For example, a cut finger that requires a band aid ONLY).
- ii. The employee is to report the injury to the foreman.
- iii. First aid treatment will be provided and the treatment will be recorded on the Incident Report 1 or 2 and a completed copy sent to the office.

C. Health Care Injury

- i. A 'health care injury' is an injury that requires treatment from a health care professional, but is not of a critical nature. For example, a cut finger that requires stitches from a physician.
The foreman is to arrange:
 - o First aid treatment for the injured employee and record the incident and treatment in the Incident Report 1 or 2.
 - o Transportation of the employee to a location where the professional health care can be provided. For example, driven by another employee or foreman or arranging for a taxi to take the employee to the hospital.
- ii. A WSIB form 6 should be provided to the employee by the ComFact office.
- iii. The foreman will contact the ComFact office to inform the manager of the incident.
- iv. When the office has been notified that a health care injury has taken place they will complete a WSIB Form 7 and submit within 3 days of the injury.
- iv. The foreman or the ComFact office will investigate the incident immediately, or as soon as possible, following the notification of the injury, illness, property and/ or incident.



D. Critical Injury

- i. A 'critical injury' is an injury of serious nature that:
 - Places life in jeopardy
 - Produces unconsciousness
 - Results in substantial loss of blood
 - Involves a fracture of a leg or arm but not a finger or a toe
 - Involves amputation of a leg, arm or foot, but not a finger or a toe
 - Consists of burns to a major portion of the body
 - Causes loss of sight in an eye
- ii. The foreman is to arrange for:
 - First aid treatment of the injured employee and record the treatment in the Incident Report 1 or 2.
 - Transportation (**see above for example**) of the employee to a location where professional health care can be delivered.
 - Immediate notification of the ComFact office
 - ❖ The ComFact manager will notify Ministry of Labour and required parties.
 - ❖ The ComFact office will complete a Form 7 and submit it to WSIB within 3 days of the incident.
 - Securing the scene and the health and safety of other employees.
 - The foreman is to conduct an investigation immediately, or as soon as possible, following the notification of the injury and/ or illness.

Accident and Incident Report

It is ComFact's policy to investigate every injury, illness, property damage and/ or incident that occurs. Investigations will be conducted by the ComFact manager and related parties and assistance from the Joint Health and Safety representative. **(Items with * requires mandatory assistance from the Joint Health and Safety representative)**. Job site investigation will be conducted by a ComFact representative.

The findings will be documented on the Incident Report 1 or 2 whenever there are incidents of:

- Health care
- Critical injury *
- Fatality *



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- Fire or explosion
- Property damage over \$1000
- Injury, illness, property damage and/ or incident possible involving public liability
- Other injury, illness, property and/ or incident

All employees will be provided or have access to ComFact's Health and Safety policy. It is the employee's responsibility to read and understand what to report and how to report an incident. Failure to report an incident could result in disciplinary measures.

When conducting the investigation it is important to:

- Preserve the injury, illness, and property damage and / or incident scene where practical and possible.
- Identify witnesses or others having knowledge of accident or incident.
- Interview the injured employee where practical and possible.
- Identify any primary and secondary causes, unsafe actions, and hazardous conditions.
- Investigations must be completed with 24 hours of incident or request.

Return to Work (RTW) and Functional Abilities Form (FAF)

A Functional Abilities Form is completed by the physician and given to the employee. The employee will need to provide a copy to ComFact manager before he or she will be able to return to work. A return to work plan may be developed by WSIB Claims Manager, ComFact manager and employee listing the responsibilities. When the RTW plan is agreed upon by all parties it will be dated, signed, and implemented. All parties will receive a copy.

ComFact manager and WSIB Claims manager will monitor the employee's progress until he or she can return to their pre-injury responsibilities. The employee will be given a FAF periodically to update the managers about his or her work progress and functional limitations. The employee and ComFact manager will communicate regularly throughout the RTW plan.



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SECTION 12 SITE SPECIFIC EMERGENCY PROCEDURES

ComFact employees have not been trained in site specific emergency procedures unless stated. They are not to be involved in site specific emergency response procedure and programs.

General Requirements

All ComFact employees will be provided with information by the Contractor on site regarding emergency procedures.

The plans include:

- Plant alarm systems
- Meeting points
- Location of shelters
- Role of Contractor on site properties
- Evacuation routes
- How to initiate emergency alarms
- Types of emergencies to expect

Contractor site representative will maintain a record of all ComFact employees on site. A head count will be completed and reported to the site owner or representative for emergencies.

ComFact employees are required to cooperate with the Contractor and their

emergency plan. SECTION 13 TRAINING AND CERTIFICATIONS

ComFact is committed to ensuring our employees have updated training certifications. All certifications and records of training will be maintained in their employee file.

Responsibility

- ComFact is responsible for ensuring all employees have required and updated safety certificates.
- ComFact is responsible for providing proof of up to date safety certifications.



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- Employee is required to attend training courses or login to complete online training tests.

A copy of trade license, apprenticeship card, Whmis, Fall Protection, working at heights and Occupational Health and Safety Awareness (Supervisor's Safety Awareness or Worker's Safety Awareness) will be provided to the Contractor.

HEALTH AND SAFETY MEETINGS

(Only applicable when ComFact provides a foreman and/ or lead hand)*

Health and safety meetings are completed weekly by the ComFact foreman or lead hand with all ComFact employees. **Attendance is mandatory for all ComFact employees.** All employees must sign in to confirm their attendance. If any employee is absent, the foreman will review the meeting and answer health and safety questions. The meeting minutes must be documented, dated, and signed by each employee and foreman.

Meeting subjects will vary weekly, and issues should be relevant to the current workplace. Employees are encouraged to report hazards and provide feedback on health and safety concerns. The foreman will send the meeting form into the office every week.

INSPECTIONS AND TOOL BOX

(Only applicable when ComFact

provides a foreman and/ or lead hand, and where tool box is provided)*

ComFact is committed to a healthy and safe workplace. Inspections will establish acceptable conditions and practices on conduct, equipment, and machinery, as well as improve and resolve unacceptable conditions and practices. The Health and Safety representative may conduct the inspections as required by the *OHSA*.

In workplaces where a ComFact foreman or lead hand is provided, tool box meetings will be held concurrent with health and safety meeting.

Responsibilities

- Employee should inspect tools and equipment before use.
- Employee will return all tools and equipment back into kit or bag and in same condition.



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- Tools and equipment will be returned to the tool box.

SITE ORIENTATION

(Subject to change based on work place)*

All employees will attend mandatory site orientation on all work sites whether conducted by the general Contractor or trade Contractor.

- Discussion of work hours, lunch and breaks, restrooms, smoking areas, emergency evacuation procedures, restricted and non-restricted areas, trailers, first aid stations, exits, etc. May also include employee responsibilities, health and safety issues, health and safety representative, absences and overtime hours



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SECTION 14 DUE DILIGENCE

Due diligence is an important defence against a Ministry of Labour penalty. An employer may use this defence if the violation of the regulation was the result of the independent action of an employee who has been properly instructed and trained.

These criteria should be followed:

1. ComFact should ensure that up to date training certificates are in place, including a record of which employees have been given the training.
2. ComFact needs to demonstrate that the training has been reinforced with proper supervision.
3. ComFact will use standard disciplinary measures when an employee wilfully ignores safe practices.

ALCOHOL AND DRUGS

ComFact has a firm position with abuse of alcohol or non-prescription drugs by employees and/ or drivers entrusted with the operation of motor vehicles under their control. The use, sale, transfer, or possession of alcohol or non-prescription drugs by any ComFact employee while working on site or operating a motor vehicle.

No driver shall use or consume alcohol during work hours, prior to work, lunch, or rest breaks. Same rules apply to the use, sale, transfer, or possession of illegal or restricted drugs. Failure to abide will result in automatic removal from site and could lead to legal action.

Any employee using over the counter or prescription drugs or medication that may impair his or her ability to safely work and/ or operate a vehicle must contact our office immediately.

WEAPONS AND FIREARMS

Never permitted on site and during work hours. Employees must not carry or possess firearms, weapons or liquid curbing emergency flares during work hours.



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TRAFFIC VIOLATIONS

Employees are required to follow the municipal and provincial traffic regulations and bylaws while working for ComFact. ComFact does not refund, repay or compensate traffic violations, infractions, tickets and fines.

The infractions include but not limited to:

- Speeding
- Excessive noise
- Driving without permit
- Disobeying traffic sign
- Parking infractions
- Not having proof of insurance
- Public intoxication
- Trespassing



SECTION 15 WORKPLACE ANTI-VIOLENCE AND HARASSMENT

ComFact is committed to building and preserving a safe, productive, and healthy work environment for its employees. In accordance to our **zero tolerance** policy we do not condone and will not tolerate acts of violence, harassment, bullying against or by any employee. We prohibit physical or verbal threats (with or without the use of weapons) by intimidation, harassment or violence in the workplace.

As stated under section 12 “Weapons and Firearms”, weapons and firearms are strictly prohibited from the workplace and company property. Violators are subject to immediate removal from workplace and may result in legal action. ComFact believes that by working together with our employees the risk of violence and harassment can be minimized.

Workplace Violence or Bullying

Workplace violence or bullying is the exercise, statement, or behaviour of physical force by a person against an employee, in a workplace, that causes or could cause physical injury to the employee.

- Physical acts (ex: hitting, shoving, pushing, kicking, sexual assault, etc.
- Any threat, behaviour, or action which is interpreted to carry the potential to harm or endanger the safety of others, and result in an act of aggression or destroy or damage property.
- Disruptive behaviour that is not appropriate at the workplace.

Personal Harassment

ComFact has **zero tolerance** policy for any unsolicited, unwelcome, disrespectful or offensive behaviour that is an underlying sexual, bigoted, ethnic or racial connotation.

- Behaviour that is hostile in nature and/ or intends to degrade an individual based on personal attributes, including age, race, nationality, disability, family status, religion, gender, sexual orientation and/ or any other Human Rights protected grounds.
- Sexual solicitation or advance made by a person in a position to confer, grant, or deny a benefit or advancement to the person where the person making the solicitation or advance knows or ought to reasonably know that it is unwelcome.



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- Reprisal or a threat of reprisal for the rejection of sexual solicitation or advance where the reprisal is made or threatened by a person in a position to confer, grant, or deny a benefit or advancement to the person.
- Unwelcome remarks, jokes, innuendoes, propositions, or taunting about a person's body, attire, sex, or sexual orientation and/ or based on religion.
- Physical contact such as touching, patting, or pinching, with an underlying sexual connotation.
- Bragging about sexual prowess.
- Offensive jokes or comments of a sexual nature about an employee.
- Displaying of pornographic or sexist pictures or material.
- Suggestive or offensive remarks.
- Unwelcome language related to gender.
- Leering (suggestive persistent staring)
- Sexual assault
- Any actions that create a hostile, intimidating, or offensive workplace (can include physical, verbal, written, graphic or electronic means)
- Any threats of physical violence that endangers the health and safety of the employee.

Racial and Ethnic Harassment

ComFact has a **zero tolerance** for racial and ethnic harassment.

Any conduct or comment which causes humiliation to an employee because of their racial or ethnic background, their colour, place of birth, citizenship or ancestry.

- Unwelcome remarks, jokes or innuendos about a person's racial or ethnic origin, place of birth, colour, citizenship, or ancestry.
- Displaying racist or derogatory pictures or other offensive material.
- Insulting gestures or practical jokes based on racial or ethnic grounds which create awkwardness or embarrassment.
- Refusing to speak to or work with someone or treating someone differently because of their ethnic or racial background.



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Application of Zero Tolerance Policy

This policy applies to all individuals working for ComFact including on site employees, foremen, lead hands, office staff and managers. ComFact does not tolerate violence or personal harassment whether engaged in by fellow employees, office staff, or the manager of the company.

All employees are accountable and responsible for enforcing this policy and must make every effort to prevent discrimination or harassing behaviour and to report to the foreman and/ or ComFact office immediately if they observe a problem or a problem is reported to them.

Reporting Violence or Bullying

In the event that you are either directly affected by, or witness to, any violence in the workplace, it is imperative for the safety of all ComFact employees that the incident be reported without delay to either the foreman or the ComFact manager.

Investigating Reports of Violence or

Bullying ComFact shall:

- Investigate all reported acts and incidents of violence or bullying.
- Consult with other parties (ex: legal counsel, health and safety consultants, employee assistance provider, Joint Health and Safety Committees (JHSC), human rights office and local police)
- Take all reasonable measures to eliminate or mitigate risks identified by the incident
- Document the incident, its investigation, and corrective action taken
- Submit a report of the incident to the MOL (*required in Ontario*) where an employee incurs a lost time injury as a result of violence in the workplace.



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Reporting Discrimination or Harassment

In the event that you are either directly affected by, or witness to, any discrimination or harassment in the workplace, it is imperative for the safety of all ComFact employees that the incident be reported without delay to either the foreman or the ComFact manager.

Procedure

- Inform the foreman or ComFact manager of the situation.

Any employee who feels discriminated against or harassed can and should in all confidence and without fear of reprisal be able to report the facts directly to the foreman or ComFact manager. The foreman and ComFact manager will complete a thorough investigation of the discrimination or harassment.

Disciplinary Action

If it is determined by the investigation that any employee has been involved in a violent and/or harassing behaviour and unacceptable conduct against another employee, immediate disciplinary action will be taken. Disciplinary actions involve formal warning and could result in immediate dismissal without further notice.

Maintaining a Positive and Safe Work Environment

As an employee of ComFact, you are responsible for your actions in the work place. We trust all our employees will help us eliminate harassment from our workplace.

- We support the employee without prejudging the situation.
- Work with the employee and document the offensive action(s) and have the employee provide a written complaint.

When we all work together to eliminate workplace violence, harassment and discrimination we have a positive and safe workplace for everyone.



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SECTION 16 PRIVACY POLICY

ComFact will at all times respect the confidentiality of the personal information placed in our care. ComFact will endeavor to ensure that the policies affecting the collection, storage, and disclosure of personal information reflect the confidential nature of the information.

ComFact will comply with all applicable privacy legislation and regulations in force now and in the future related to protecting the confidentiality of personal information.

Purpose for which Personal Information is collected

Personal information will be collected, used, and disclosed for purposes pertaining to the individual's employment relationship with ComFact, including but not limited to the administration of employee hiring, performance reviews, administration of employee payroll, processing employee benefit claims and for the purpose of complying with all applicable labour and employment legislation.

Personal information will only be used for the stated purpose or purposes for which it was originally collected. The information that is being collected will be identified orally or in writing to the individual before it is collected. The office employee collecting the information will explain the purpose at the time the information is collected. ComFact may use personal information for a purpose other than the originally stated purpose where the new purpose is required by law or where ComFact has obtained consent in writing from the employee for each new purpose.

SECTION 17 TOOL POLICY

ComFact employees are required to come to work equipped with safe and well maintained tools. Please see attached for a list of employee's required tools and equipment. It is the employee's responsibility, unless stated that ComFact will supply tools and equipment on work site.



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SECTION 18 CELL PHONE POLICY

Brief and occasional use of cell phone is acceptable as long as it is not excessive or inappropriate, occurring during personal time (lunch or breaks) and does not result in expense or harm to ComFact, employees, workplace, or otherwise violates this policy. Excessive use is defined as interference with normal job functions, responsiveness, or the ability to perform job activities.

ComFact is committed to the health and safety of their employees and work site. Using a cell phone could lead to harm and an unsafe workplace. Do not use phone while at heights, using or operating a mobile elevated lift device, using or operating power equipment which requires both hands and full attention or could cause a distraction. If any employee violates this policy and their safety or that of others, he or she will be subjected to disciplinary action and could lead to dismissal.

SECTION 19 HEAT STRESS PREVENTION AND HOT WEATHER POLICY

Committed to the ongoing health and safety of all ComFact employees that are exposed to a high level of heat and/ or other climatic conditions, which may cause adverse effects to their health and safety in their performance of their regular job. This policy includes both indoor and outdoor work where the temperature is a concern.

ComFact manager, foreman, and lead hand will be responsible for the overall health and safety of employees under their direction. If ComFact does not provide a foreman or lead hand the Contractor will take responsibility. Where temperature is a concern, Contractor, foreman or lead hand will evaluate the work that will be performed and ensure that safeguards (first aid and material) are in place, and relief measures (drinking water, rest periods schedules) are available and implemented. As necessary, ComFact manager, foreman (if supplied), lead hand (if supplied) or Contractor will adjust and adapt work schedules to effectively reduce the risk of injury and/ or illness due to heat stress.



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Controls of Heat Stress

Follow guidelines to prevent heat related disorders:

1. Engineering Controls
 - a. Ventilation and/ or air conditioning shall be applied (where possible).
 - b. Alternative methods using fan, openings windows, and in cases of outdoor work a shaded area should be available.
2. Work Conditions
 - a. Regularly check weather conditions and temperatures that may affect work, and adapt schedule to appropriate tasks.
3. Work or Rest Cycles
 - a. Work requiring strenuous physical activity shall be scheduled for cool periods during the day, and non-essential tasks will be re-scheduled until such time as the risk of injury or illness due to heat stress falls into acceptable range.
4. Personal Protective Equipment
 - a. Direct employee to wear or utilize appropriate light weight or breathable clothing to provide maximum protection against sun and potential health and safety hazards involving both work and heat stress.
 - b. Employee should wear sunblock for outdoor work.
5. Fluid Intake
 - a. Minimize dehydration and other health risks by providing access to plenty of drinking water.



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APPENDIX

Incident and Accident Report	i.
Incident and Accident Investigation Report	ii.
Corrective Action Form	iii.
Witness Statement Form	IV.