



MJ DIXON CONSTRUCTION LIMITED

HEALTH AND SAFETY PROGRAM

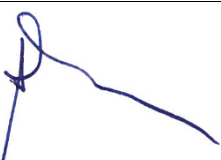
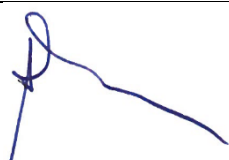
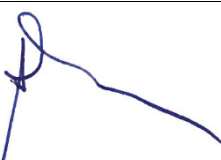
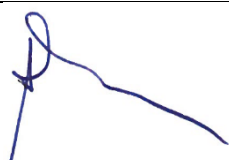
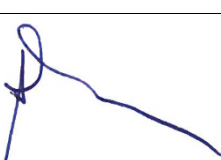
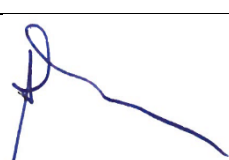
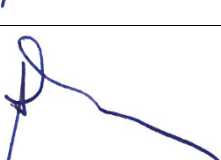
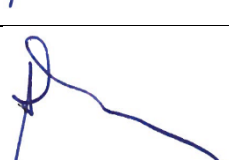
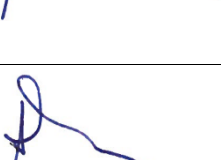
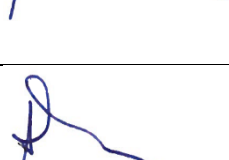


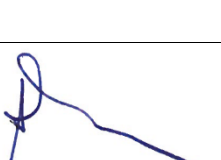
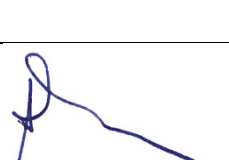
LAST REVISED: JULY 2025

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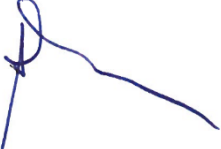
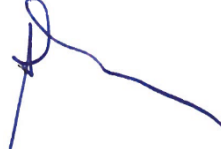
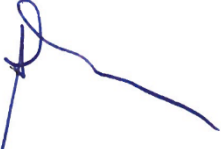
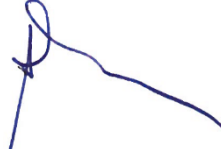
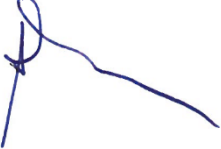
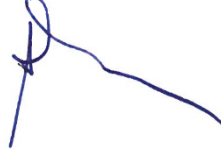




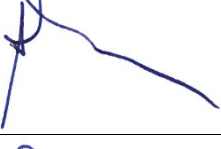
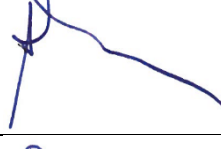
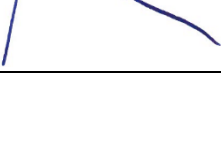

PROGRAM REVISIONS

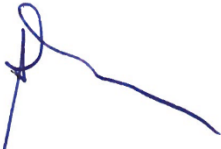
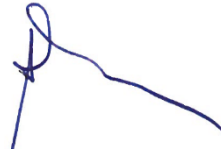
Date of Revision	Changes/Topics	(Official's Initial)	Today's Date	Signature
February 2014	1. Theft 2. Bill 160 Training Req.		February 2014	
February 2015	Working at Heights Training Standards		February 2015	
February 2015	New Definition of a Worker Under the OHSA		February 2015	
February 2016	1. New WHMIS 2015 2. Noise 3. PEWP Changes		February 2016	
March 2017	Mold added into designated substance examples. Annual review and signoff from management representative.		March 2017	
February 2018	Amended to meet COR requirements		February 2018	
October 2018	Amended to meet COR requirement recommended by the IHSA internal audit report review		October 2018	

Dated: July 2025

Previous Version: December 2024

Reviewed/Revised by: HSE Department

June 2019	Amended to meet COR requirements recommended by External audit report review		June 2019	
August 2020	Amended to meet COR requirements recommended by External audit report review		August 2020	
August 2021	Amended to meet COR requirements recommended by External audit report review		August 2021	
August 2022	Amended to meet COR 2020 requirements recommend by External audit report review		August 2022	
August 2023	Amended to meet COR 2020 requirements recommend by External audit report review		August 2023	
August 2024	Annual review.		August 2024	
December 2024	Bill 190 inclusions		December 2024	

July 2025	Annual review.		July 2025	
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The Health and Safety Program must be reviewed on an annual basis and any changes or additions must be documented. Senior Management must sign and date the policy statements annually. It is the responsibility of the Safety Manager to ensure that this process takes place annually

CHAPTER ONE

HEALTH AND SAFETY POLICY

AND

DOCUMENT AND RECORD CONTROL

HEALTH AND SAFETY, ENVIRONMENTAL POLICY STATEMENT

Document Name: Health and Safety, Environmental Policy Statement	Document Number: PS001
Prepared by: Mauricio Carmona	Date of Issue: August 2021
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: February 2025
Frequency of Review: 1 year	Revision Number: 2

M.J. Dixon Construction Limited (MJD) is committed to excellence in Health and Safety, and Environmental (HSE) policy. MJD acknowledges their employees' rights to a safe and healthy work environment and will foster an organizational culture that promotes physical and psychological health and safety. Through implementation of strategic programs and business-specific initiatives, MJD ensures that its operations and services cause zero harm to people and the environment.

Senior Management Team actively support the implementation of this policy and are committed to:

- Set and review Occupational Health and Safety (OHS) objectives and continual improvement of the Occupational Health and Safety Management System (OHSMS) and OHS performance.
- Provide a safe and healthy work environment for the prevention of injuries and illnesses.
- Work collaboratively with its employees to create and sustain a psychologically and physically healthy and safe work environment. Integrate into existing and future operational policies and processes those practices that support and promote psychological and physical health and safety in the workplace.
- Communicate and coordinate HSE policies, programs, and procedures with all workplace parties.
- Ensure all legislated HSE requirements and responsibilities, client requirements, recognized industry practices and MJD standards are met and always applied.
- Work in a spirit of consultation and cooperation with workers.
- Establish a joint health and safety committee or safety representative that is responsible for promoting and monitoring Health and Safety policies, programs, and compliance with the OHS Act and regulations.
- Provide education and job training to demonstrate HSE competence so that all employees know their roles and responsibilities as well as hazards and risks to carry out their work safely while reducing environmental impacts.

MJD has a program that further addresses the health and safety roles and responsibilities of workplace parties. In summary, the roles, and responsibilities of other members of our organization are:

- **The Management Team:** regularly evaluate and address workplace hazards, introduce preventative and protective measures to address hazards and provide associated training, awareness, and competency development for all employees.
- **Supervisors:** held responsible and accountable for the health and safety of the workers working under their supervision. They must make sure tools, equipment and machinery provided are safe, and that workers understand and work in compliance with the OHS act and other company HSE procedures and practices.
- **Workers:** responsible for the health and safety of the worker's own person, as well as the others around them, by working in compliance with the law, safe work practices, and procedures established by MJD.
- **Contractors, Subcontractors, and Suppliers:** will be evaluated by MJD third party pre-qualification process. They will work in compliance with the OHS act regulation and MJD HSE program requirements.

MJD is committed to prevent all safety and environmental incidents in its day-to-day operations through ongoing quality improvement activities. The safety information in this policy does not take precedence over the Occupational Health and Safety Act. All employees should be familiar with the Occupational Health and Safety Act.



February 2025

MJ Dixon Construction Ltd. – Vice President

Date

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	July 2022	Entire policy revised to reflect COR 2020 requirements	Paul Chiang
Mauricio Carmona	July 2023	Annual review. No changes.	Paul Chiang
Mauricio Carmona	February 2024	Incorporated Management commitments of physical and psychological well-being into policy.	Paul Chiang
HSE Department	February 2025	Annual review. No change.	Paul Chiang

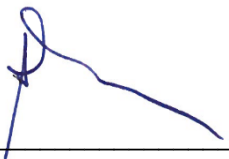
ENVIRONMENTAL POLICY STATEMENT

Document Name: Environmental Policy Statement	Document Number: PS003
Prepared by: Mauricio Carmona	Date of Issue: August 2022
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: No Change

At M.J. Dixon Construction Limited we believe that all employees, supervisors, and managers shall behave in a way that protects and preserves the environment. We are committed to protecting the environment and resources in all areas affected by our activities. Compliance to environmental legislation pertinent to our activities or those of our clients is a minimum requirement and an integral part of our policy.

It is the company's policy to:

- Comply with applicable environmental laws and regulations at all levels of authority municipal, provincial and federal.
- Protect the environment from adverse effects of production operations.
- Provide any information in our possession on the most appropriate Health, Safety and Environmental Management and waste disposal practices to be utilized.
- Conduct workplace audits and walk-through surveys to ensure compliance.
- Promote awareness and education.
- Stay informed of any law changes and waste disposal requirements.
- Maintain all equipment, cranes and vehicles in the manner that prevents leaks, spills and discharge of petrochemical product on the soil or concrete surfaces.



MJ Dixon Construction Limited – Vice President

July 2025

Date

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	July 2023	<i>Annual Review. No changes.</i>	Paul Chiang
Mauricio Carmona	July 2024	<i>Annual Review. No changes.</i>	Paul Chiang
HSE Department	July 2025	<i>Annual Review. No changes.</i>	Paul Chiang

DUTIES AND RESPONSIBILITIES OF WORKPLACE PARTIES

Document Name: Duties and Responsibilities off Workplace Parties	Document Number: SJP70
Prepared by: Mauricio Carmona	Date of Issue: August 2022
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: No change

CONSTRUCTORS

Along with Section 23 of the Occupational Health and Safety Act (OHSA), below are responsibilities of a constructor:

- Ensure all workers on site are in compliance with the Occupational Health and Safety Act and Regulations for Construction Projects.
- Ensure that subcontractors are obliged by contract to comply with the constructor's safety program.
- Ensure the health and safety of all workers on the project is protected.
- Ensure the Notice of Project is posted on site.

EMPLOYERS

Along with Section 25 of the OHSA, below are responsibilities of an employer (senior management):

- Provide a safe and healthy workplace.
- Prepare and review at least annually a written corporate occupational health and safety policy.
- Assign and review the development of an occupational health and safety program to implement the policy.
- Provide the necessary resources to implement, support, and enforce the health and safety policy and program within the company. (Note: the provisions of the *Occupational Health and Safety Act and Regulations for Construction Projects* address the minimum requirements for the control of health and safety hazards.)
- Provide workers with health and safety information and training.
- Promote the exchange of health and safety information with outside groups, such as regional labour-management health and safety committees and trade associations.
- Review accident reports and communicate with government agencies, unions, and other organizations regarding legally required notices respecting critical injuries, accidents, incidents, and other events. (For more information, refer to Legal Requirements for Reporting Accidents and Incidents in CSAO's DS030: *A Guide to Developing Health and Safety Policies and Programs in Construction*.)
- Conduct an annual review meeting with project manager and superintendent.
- Attend at least one health and safety committee meeting at a project each year.
- Perform workplace inspections at least annually to monitor the program and take corrective action.
- Appointing competent personnel as supervisors.
- Reviewing health and safety trends which include injury/illness causes, injury/incident investigations, hazard reports and work refusal reports; commending employee health and safety performance.

PROJECT MANAGERS

Along with Section 27 of the OHSA, the following are responsibilities of project managers:

- Implement, support, and enforce the safety program at the project level.
- Communicate with the Senior Management on Ministry of Labour-related items, such as notices respecting projects and notices of accidents and injuries.
- Cause a health and safety committee to be established and represent management on it.
- Oversee site planning and approve a site plan that takes into account access, traffic control, materials handling, storage, and sanitation.
- Review site fire protection and emergency response plans.
- Review site training plans for health and safety and ensure that adequate resources are available.
- Review safe work procedures for the site.
- Direct accident investigations on site. Review and forward reports to head office.

SUPERVISORS

Along with Section 27 of the OHSA, the following are responsibilities of supervisors (including subcontractors):

- Ensure all workers including subcontractor's employees are orientated to the MJ Dixon Construction Limited corporate health & safety policy and program.
- Ensure that all workers work in a manner that will not endanger themselves or other workers.
- Ensure that workers wear and use the proper personal protective equipment, devices or clothing that is required by the employer to prevent injury.
- Advise worker and management of any potential or actual health and safety hazard of which he may be aware.
- Provide the information, instruction, and supervision to protect the workers' health and safety.
- Take every precaution reasonable in the circumstance to protect the health and safety of workers.
- Where prescribed by law, provide oral and/or written instruction to a worker (in a language He understands), as to the measures and procedures the worker is to follow for his/her protection.
- Hold weekly safety meetings with the crew and document minutes of these meetings.
- Investigate accidents/incidents (as required) promptly and provide a written report of the findings, with corrective measures to prevent a recurrence, to MJ Dixon Construction Limited head office, immediately.
- Deal with worker safety violations in a responsible and disciplinary manner, and provide documentation of the circumstances and action taken to management.
- Work Permitting Policy and Procedures.

Note: Candidates for supervision should have a good knowledge of the *Occupational Health and Safety Act and Regulations for Construction Projects*, as well as knowledge of the trade and well-developed communications skills.

WORKERS

Along with Section 28 of the OHSA, the following are responsibilities of workers (including subcontractors):

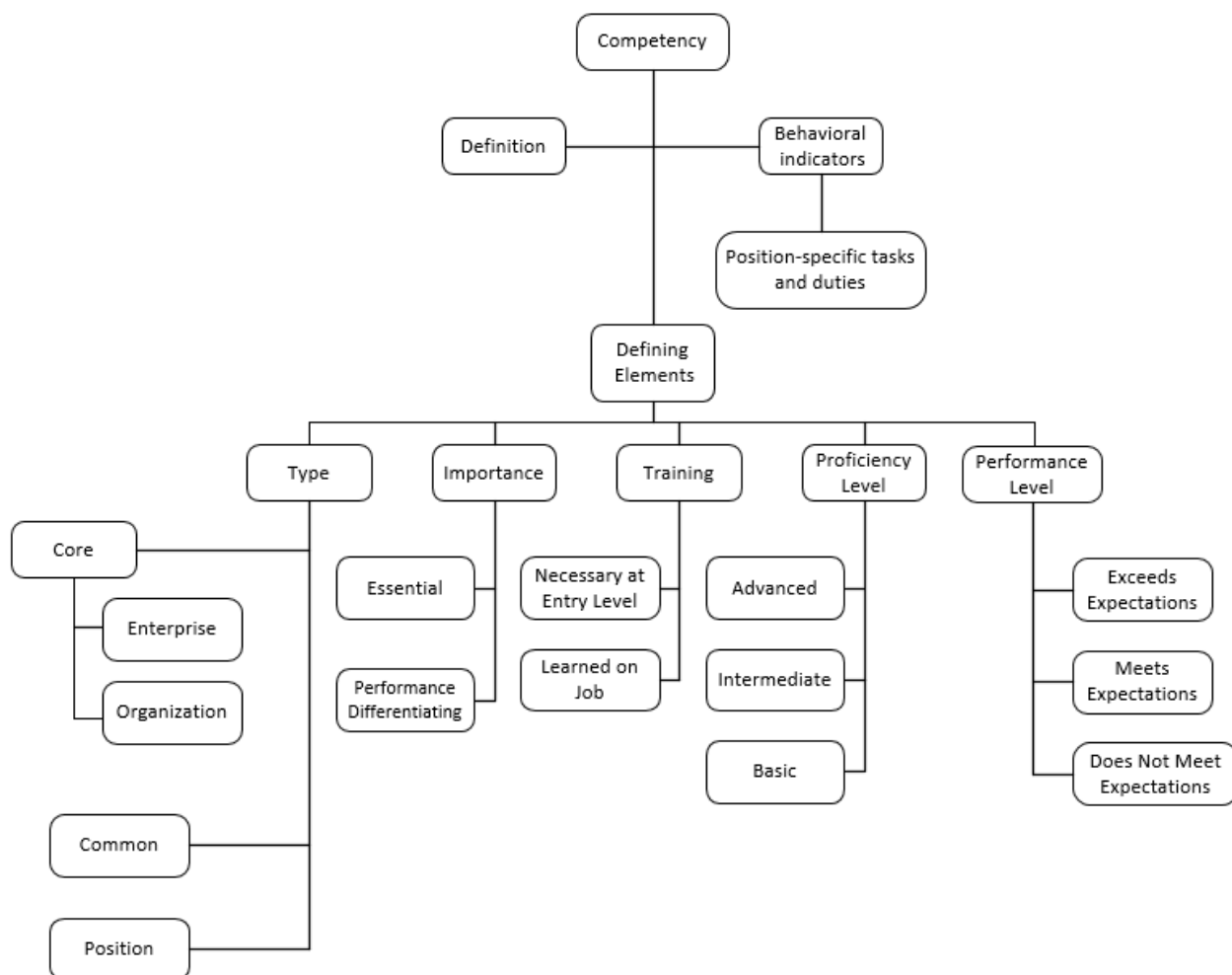
- Work in compliance to the occupational health and safety act and its regulations.
- Work in compliance to the governing corporate health and safety policy.
- Wear and use any personal protective equipment/clothing that is required for his or her health and safety.
- Report any hazardous conditions or unsafe practices immediately to their supervisor.
- Work in a manner that will not endanger his/her self or other workers.

- Report any near misses, incidents and accidents regardless of its severity, to his/her supervisor, without delay.
- Not remove or make ineffective any protective device required by the regulations or by the employer without providing an adequate temporary protective device and when the need for removing or making ineffective the protective device has ceased, the protective device shall be replaced immediately.
- Not engage in any prank, contest, and feat of strength, unnecessary running or rough boisterous conduct.
- Shall exercise the right to know and right to refuse work and take the necessary precautions to when working with hazardous materials in the workplace, by reviewing the material safety data sheets for the particular material in question and follow the instructions outlined in addition to any further measures, for his/her protection.
- Obtain first aid promptly and notify their supervisor of any first aid situation that becomes a medical aid condition so the proper authorities can be notified.
- Designated Substance Notification:
Should a worker suspect or know he or she has disturbed or otherwise come into contact with a "designated substance" as prescribed under Ontario's Occupational Health and Safety Act and its regulations, the worker shall immediately report the finding or suspicious material to his or her foreman for further investigation.
- Not engage in acts of violence, discrimination, harassment and bullying.
- Participate in project specific safety talks and meetings.

JHSC/CERTIFIED MEMBER

- Inspect the workplace, equipment, and material at least once a month
- Write recommendation to employer on how to improve Health and Safety in the workplace
- Follow-up on recommendations. A response on recommendations should be received no later than 24 calendar days
- Attend and participate in JHSC meetings which are held every Quarter
- Co-chair JHSC meetings – alternatively plan and prepare for meetings
- Be present at the beginning testing.
- Investigate work refusals and dangerous circumstance
- Accompany Ministry of Labour on his/her inspection
- Consult with the employer to review policies and procedures and practices such as
 - Company Health and Safety Policy
 - Violence and Harassment Policy
 - WHMIS program

COMPETENCY OF SUPERVISORS AND WORKERS



Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	July 2023	Annual Review. No Changes.	Paul Chiang
Mauricio Carmona	July 2024	Annual Review. No changes.	Paul Chiang
HSE Department	July 2025	Annual Review. No changes.	Paul Chiang

CONTROL OF RECORDS AND DOCUMENTS PROCEDURE

Document Name: Control of Records and Documents Procedure	Document Number: SJP27
Prepared by: Mauricio Carmona	Date of Issue: August 2022
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: 1

1. Purpose

The purpose of this procedure is to ensure all health and safety records and documents of internal and external origin are controlled with respect to creation, approval, distribution, management, and storage.

2. Scope

This procedure applies to all documents and records determined by M.J. Dixon Construction Limited (MJD) to be necessary for the effectiveness of the Occupational Health and Safety Management System (OHSMS). Examples of records and documents determined to be necessary for the effectiveness of the OHSMS include, but is not limited to:

- All documents (policies and procedures) required by COR 2020 standard
- Training records
- Meeting minutes
- Inspection reports
- Evaluation reports
- Sampling reports
- Incident investigations and documented interviews
- Test results conducted in-house or by a third-party supplier
- Documents of external origin that are necessary for the planning and operation of the OHSMS (i.e. Workplace Safety and Insurance Board (WSIB) and Ministry of Labour (MOL) and client documents, records and reports)

3. Definitions

Document: Describes the “who, what, when” of a process and is changed as needed.

Document Control Register: A list which identifies all MJDs documents and includes current revision status.

Document Number: The number assigned to a document when it is entered into the document control register as a controlled document. This number will always be the next sequential number in the register. This number is to be recorded on the controlled document in the header and/or footer for the document.

Record: Demonstrates that training, communication, and implementation have taken place. Unlike documents, records are created when things are done and are never modified once they have been created.

4. Roles and Responsibilities:

Senior Management:

- Determine documents and records necessary for the implementation and effectiveness of the OHSMS.
- Review and approve documents prior to initial release and every time modifications are made.
- Ensure information, training and instruction is provided on this procedure.
- Ensure all documents and records remain legible and readily identifiable at all points of use.

- Protect the privacy and confidentiality of documents and records, as appropriate.

Document Author:

- Draft, review, and update documents applicable to their area of expertise and assign document revision cycle.
- Ensure changes to, and current revision status of documents are identified and tracked.
- Ensure documents are reviewed and approved by Senior Management prior to release.
- Send all approved documents to the Document Controller for issue.
- Communicate to all employees when a new document has been released and provide necessary training on that document.

Document Controller:

- Ensure that the requirements of this document are understood, implemented and maintained by all affected personnel.
- Manage the document control and records management process.
- Ensure documents are developed using correct styles and format.
- Establish a master list of controlled documents and update it as necessary.
- Issue a new document and ensure only approved, current versions of documents are readily available at all points of use.
- Remove obsolete documents from employee access and archive a copy of the previous revision. Ensure all archived documents are restricted to authorized personnel to prevent unintended use.

Workers:

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

5. Procedure

Senior Management in coordination with the Document Controller shall review all the documentation in the OHSMS to determine which records MJD determines to be necessary for planning, implementation, control, evaluation, and overall management of the OHSMS.

The creation, collection, retention, and distribution of records must comply with all applicable legal requirements, and organizational policies, as appropriate. MJD will create and maintain records to provide evidence of conformity to health and safety system requirements.

5.1 Document Properties

All MJD documents shall display the following information in the header:

- Document Name and Number
- Document Author ('Prepared by')
- Document Approver ('Approved by')
- Issue Date
- Review Date, and
- Revision Number

5.2 Document Approval

All documents must be reviewed for adequacy and approved by Senior Management prior to initial release and after each modification or change. A signature, initials, or name of Senior Management in the document properties or near the document identification number are required for approval. The approval will be signified by the placement of the new or

reviewed procedure onto the computer network and/or management system software by the Document Controller so that it may be communicated to relevant personnel to allow implementation and training.

5.3 Document Review

All documents part of MJDs OHSMS shall be reviewed, updated, and re-approved at least every 1-3 years, or sooner if required by law. Reviews may be scheduled or unscheduled.

The review shall ensure that the following is considered:

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

All documents shall be identified, tracked and current revision status made, when they undergo review and/or modification.

The Document Controller shall ensure that relevant versions of applicable documents are available at points of use via MJDs computer network or management system software and distributed accordingly to project staff concerned.

5.4 Obsolete Documents

Obsolete documents are those which are no longer required, replaced, or superseded as determined by the needs of the Health and Safety Management System. Obsolete documents shall be removed from the software management system, server, and hard copy site by the Document Controller to prevent unintended use.

Obsolete documents shall be appropriately archived electronically and identified as “OBSOLETE” in the software management system and/or server, if they are retained for any purpose.

Access to “OBSOLETE” documents shall be restricted to authorized individuals only and accessible for system evaluation and legal purposes (where relevant).

5.5 Document Numbering System

All controlled copies of documents required for MJDs OHSMS shall be assigned code numbers by the Document Controller and recorded in the Document Control Register for the identification and retention of records.

Document Codes will identify the document type produced by MJD. Document codes may include, but is not limited to the following:

- HSF – Health and Safety Form
- SJP - Safe Job Procedure
- SWP – Safe Work Procedure or Practice
- HSM – Health and Safety Meetings

Each document will have a sequential number following the document code, beginning at 01. For example, Safe Work Procedure 01 (i.e., SJP01).

Sequential revision numbers will also be assigned when documents are superseded. The first revision is “1” and then increments sequentially.

The Document Control Register should be reviewed as appropriate to ensure that document codes and numbers are not duplicated.

5.6 Document Control Register

The Document Control Register shall be maintained by the Document Controller for all MJDs documentation created or modified.

The document Control Register shall include the following information:

- Document Name
- Document Number
- Document Type
- Created By
- Creation Date
- Description of Document
- Reviewed By
- Review Date

5.7 Control of External Documents

External documents are defined as documents whose origin and control are by a body outside MJD that may be necessary for the planning and operation of the Health and Safety Management System. Examples include:

- Equipment manuals
- Supplier manuals, specifications, or standards from customers
- Documents necessary for the planning and operation of the health and safety management system
- International or national safety standards, i.e., Canadian Standards Association (CSA)

External documents shall be maintained as digital files on the software management system or server, whenever possible. When practical, external documents that are readily available on the internet should not be maintained at MJD.

All obsolete, external documents shall follow the procedure as outlined in **Section 5.4 Obsolete Documents**.

5.8 Records Management

Employees responsible for the completion and maintenance of records shall enter all required information and ensure that the records are legible and identifiable before filing.

Records shall be protected from sunlight, heat, moisture, etc. and shall also clearly mark files/boxes and even electronic storage/files as per indexing requirements.

Employees responsible for the retention and maintenance of records shall keep the original in place and make a copy if the record is required away from the filing/storage area. They shall also not release records to external parties, unless approved by Senior Management.

5.9 Security

All employees who handle records shall ensure the protection of privacy and confidentiality, as appropriate. Paper records containing personal information such as WSIB claims and files will be stored in a secure location, such as a locked office/room or desk drawer. Electronic records containing personal information shall be stored and encrypted on a password protected laptop or computer, with file and folder-level permissions.

Records requiring the protection of privacy and confidentiality may include, but are not limited to:

- Employee personal files
- Medical files
- Disciplinary notes
- Investigation reports (including workplace violence and harassment)
- WSIB/Return to Work files

Only authorized individuals within MJD will have access to sensitive or personal information.

All MJD employees have the right to access records relevant to their health and safety, while respecting the need for confidentiality.

6. Revisions:

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	February 2023	<ul style="list-style-type: none"> • Updated Section 5.2: Document Approval • Updated Section 5.3: Document Review • Updated Section 5.5: Document Numbering System • Updated Section 5.9: Security • Added Section 6: Revision History <p><i>*Changes made to reflect COR 2020 external audit review and findings.</i></p>	Paul Chiang
Mauricio Carmona	August 2024	<ul style="list-style-type: none"> • Annual review. No changes. 	Paul Chiang
HSE Department	July 2025	<ul style="list-style-type: none"> • Annual review. No changes. 	Paul Chaing

CHAPTER TWO

HAZARD ASSESSMENT, ANALYSIS AND CONTROL

HAZARD ASSESSMENT, ANALYSIS AND CONTROL POLICY STATEMENT

Document Name: Hazard, Assessment, Analysis and Control Policy Statement	Document Number: SJP16
Prepared by: Mauricio Carmona	Date of Issue: August 2022
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: No Change

M.J. Dixon Construction Limited (MJD) is committed to injury and illness prevention through the identification, analysis, and control of hazards in the workplace.

Hazard assessment, analysis and control will be conducted for all operations, including routine and non-routine operations and human factors where work is performed. Hazard identification will also be conducted outside of the workplace that may impact occupational health and safety within the workplace for which MJD has control. Risks resulting from any identified hazards will be classified, prioritized and a list of critical tasks will be maintained.

MJD will consider all legal requirements, applicable standards and guidelines in the hazard assessment process and will ensure that hazard assessments, analysis and controls are developed with the cooperation of all competent workplace parties. MJD will ensure that hazard assessments and controls are reviewed and updated at least annually.

Supervisors are responsible for conducting regular hazard and risk assessments prior to the commencement of work, when equipment, material, substance, or process are introduced or changed, or when a change to the Occupational Health and Safety Management System (OHSMS) may impact workplace operations or activities. Supervisors are also responsible for communicating the results of these assessments to workers and contractors while ensuring they are following the related procedures accordingly.

All workers are responsible for reporting actual or potential hazards to the respective Supervisors, immediately, and following all MJD policies, procedures and applicable legislative requirements, standards, and guidelines.

This policy will be reviewed annually, and records of review maintained.



MJ Dixon Construction Ltd. – Vice President

July 2025

Date

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	July 2023	<i>Annual Review. No Changes.</i>	Paul Chiang
Mauricio Carmona	July 2024	<i>Annual Review. No Changes.</i>	Paul Chiang
HSE Department	July 2025	<i>Annual Review. No Changes.</i>	Paul Chiang

HAZARD ASSESSMENT, ANALYSIS AND CONTROL PROCEDURE

Document Name: Hazard Assessment, Analysis and Control Procedure	Document Number: SJP28
Prepared by: Mauricio Carmona	Date of Issue: August 2022
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: 3

1. Purpose

This procedure will assist in identifying and controlling potential hazards in the workplace. M.J. Dixon Construction Limited (MJD) understands that hazard awareness is critical to keep our worksites safe. The following is the procedure for the detection and mitigation of hazardous conditions that may exist at the workplace.

2. Scope

This procedure applies to all employees at MJD. Hazard assessments for routine and non-routine tasks performed by MJD employees can be found in the Job Hazard Analysis Manual.

3. Definitions

Hazard – a hazard is any source of potential damage, harm or adverse health effects on something or someone.

Hazard Assessment - the process of conducting a systematic review in order to identify hazards associated with work activities, analyze the risks associated with the hazards, and determine the appropriate ways to eliminate or control the hazards.

Job Step - a segment of the operation necessary to advance the work. The steps must be kept in sequential order.

Ongoing Hazard Assessment – the process of conducting daily hazard assessments to address the ever-changing site activities and conditions.

4. Roles and Responsibilities

Senior Management:

- Review Job Hazard Analysis Manual annually, or as required.
- Develop new Job Hazard Assessments as required.
- Ensure a standardized form is used to record the findings of hazard assessments, analysis and control.
- Identify core competencies and training required by the individual(s) directly responsible for conducting hazard assessments.
- Ensure communication to all workers regarding the results and review of the hazard assessment process as required.
- Provide assistance in implementing necessary controls.
- Approve the implementation of requested controls in a timely manner.
- Follow up with implemented controls to ensure effectiveness.

Supervisors:

- Identify all tasks being performed in their workspace and ensure that those tasks have been assessed for risk.
- Ensure hazard assessments have been completed before performing any tasks related to the operation and /or activity, and before the infection, start-up or use of new equipment, material, substance or process.
- Ensure hazard assessments have been completed when there is change to existing equipment, material, chemical or process; or when there is change to the OHSMS that may affect workplace operations or activities.
- Develop a list of identified critical tasks and/or activities based on the risk rating system.
- Communicate the results of the Job Hazard Analysis to all affected workers to ensure awareness of process and outputs.
- Ensure workers review the hazard analysis related to their job.

Workers:

- Report actual or potential workplace hazards to the Supervisor immediately.
- Participate in and contribute to the hazard assessment process and outputs as required.
- Review and sign off on the Daily Field Level Assessment.
- Review the Job Hazard Analysis as it relates to their job tasks. Follow the safe work practices and safe job procedures that apply to their job tasks.

Joint Health and Safety Committee (JHSC):

- Assist management in developing and reviewing Job Hazard Analysis.
- Ensure the hazard assessment process is carried out proactively and progress is being made.
- Complete any corrective action plans assigned and approved by Senior Management.

5. Procedure**5.1 HAZARD ASSESSMENTS**

The following is to take place for all hazard assessment activities:

- Hazard assessments, analysis and control are documented utilizing forms:
 - HSF001: Daily Pre-Job Hazard Assessment; and
 - SJP69 Job Hazard Analysis Manual.
- Hazard assessments are updated on a regular basis;
- Hazard assessments prioritize health and safety hazards for all operations; including routine and non-routine work, and human factors where work is performed;
- Hazard assessments take into account legal requirements and associated standards and guidelines;
- Take into account design and layout of the work area and ergonomics;
- Identify hazards originating outside of the workplace that may impact OHS within the workplace for which the organization has control;
- Relevant documents are made readily available to workplace parties;
- Everyone at the workplace is informed; and,
- Involvement and consultation of appropriate competent workplace parties such as workers, supervisors, maintenance, engineering, and suppliers in the hazard assessment process.

5.2 WHEN TO COMPLETE A HAZARD ASSESSMENT

Hazard assessments are to be conducted:

- Proactively before performing any task(s) related to the operation and/or activity;

- Proactively before the introduction or start-up, or use of new equipment, material, substance or process;
- When there is a change to existing equipment, material, substance or process;
- When there is a change to the Occupational Health and Safety Management System (OHSMS) that may affect workplace operations or activities.

Actual or potential hazards, or hazards originating outside of the workplace that may impact OHS within the workplace for which the organization has control, that are reported by any worker should be brought to the attention of Supervisor immediately to be corrected. Supervisors are responsible for addressing any hazard or unsafe work conditions and correcting the issue by completing the following steps:

- Assessing the hazard using the Risk Rating Matrix/Scale
- Implement controls if not already implemented
- Assess the degree of risk to workers after a control is implemented
- Determine whether the hazard is deemed an acceptable risk
- If the risk is not acceptable, develop new controls to mitigate risk and consult professional assistance if required.

5.3 WHO COMPLETES A HAZARD ASSESSMENT

Hazard assessments, analysis and control are to be completed by a qualified person with the following core competencies, knowledge or training:

- Familiar with the work and associated hazards;
- Familiar with/aware of legislative requirements;
- Risk assessment theory to process;
- Hierarchy of controls;
- Contributing factors analysis (PEMEP) or incident investigation theory; and,
- Verification mechanism such as checklists, audits, etc. to facilitate follow-up of implementation of controls.

5.4 HOW TO COMPLETE A HAZARD ASSESSMENT

When an update to the Job Hazard Analysis is required, the following steps are to be followed:

A. BREAKDOWN OF JOB INTO SEQUENTIAL STEPS

Identify the job steps required to complete the task.

B. IDENTIFY HAZARDS ASSOCIATED WITH EACH STEP

All actual and potential hazards must be identified and recorded at each step. This can be done based on the knowledge of the job, knowledge of previous accidents/incidents causes, and personal experience. In identifying potential hazards, it would be beneficial to ask workers about their personal experience and knowledge of the job.

Along with a hazard description, it is also important to identify the type of hazards. The types of hazards are as follows:

- **Physical** - noise, vibration, electricity, heat and cold, pressure and radiation.
- **Chemical** - gases, vapours, liquids, solids, plasma, dust, fume or mist.
- **Biological** - living organisms, such as bacteria, viruses, mould, parasites and fungi.
- **Musculoskeletal** - poorly designed equipment or work processes which place undue strain on the body by repetitive or strenuous activity.

- **Psychosocial** – risks of crime and violence and harassment in the workplace; production pressures which can influence the pace of work.
- **Safety** – housekeeping, falls, pinch points, sharp points, sharp edges, moving machinery, dropping items, pressure systems and fire and explosion.

C. CONDUCT A RISK ASSESSMENT FOR EACH HAZARD

The level of risk must be identified for all hazards, using the probability and severity of injury. The Job Hazard Analysis Matrix (found in the JHA Manual) provides a table for determining the level of risk before and after identifying controls.

MJD has defined their risk threshold level to be any task with a hazard risk greater than 12. These tasks are considered critical tasks and require the development of a safe job procedure. The following is a list of critical tasks based on the Job Hazard Analysis:

- Supervising Site
- Operating a Loader
- Operating a Skid Steer
- Excavation
- Structural Steel Installation
- Working on Scaffolds
- Working on Elevating Work Platforms
- Working on Swing Stages
- Ladder Use
- Working at Heights
- Working in a Confined Space
- Refueling Equipment
- High Voltage Work
- Hoisting and Rigging
- Working Alone

D. IDENTIFY PREVENTIVE CONTROLS FOR EACH TASK

Preventative controls must be implemented for each identified hazard. The types are as follows:

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

Supervisors will develop preventative control measures by:

- Collaborating or consulting with relevant workplace parties and external professionals to develop new or improve existing controls
- Conducting research and staying up to date with safety measures available to the industry
- Reviewing and considering legal requirements and associated standards and guidelines

Upon identification of a hazard, any controls, safe work practices and safe job procedures required must be implemented in a timely manner. (Refer to the JHA guide for detailed instruction).

E. COMMUNICATION OF JOB HAZARD ANALYSIS

Workers will review the job hazard assessments that apply to their job through the company's management system software. The job hazard analysis must be reviewed and acknowledged by the workers to indicate that they understood their hazard exposures and controls. Workers who perform the job must ensure that all the basic steps of the task have been noted, are in the correct order, have suitable controls and are documented. If the worker does not agree with the assessment, they must inform their supervisor. The supervisor must review the worker's concern, update the assessment if required and communicate this information to the workers. Supervisors must ensure that workers are following the appropriate control procedures.

F. REVIEW AND EVALUATION OF JOB HAZARD ANALYSIS

Management must monitor implemented controls for effectiveness. This can be in the form of obtaining feedback from workers.

Job Hazard Analysis' shall also be reviewed and updated after incident investigations or when the phase of a project changes; and must be completed annually by Senior Management.

G. CONTRIBUTING FACTORS TO CONSIDER

Job Hazard Analysis must consider contributing factors that may cause a low-priority risk to become a high-risk priority, such as people (human factors), environment, process, material and equipment.

A Job Hazard Analysis must also consider the following additional factors:

- **Accident frequency and severity** - jobs where accidents occur frequently or where they occur infrequently but result in severe injuries.
- **Potential for severe injuries and illnesses** – the consequences of an accident, hazardous condition, or exposure to harmful substances are potentially severe.
- **Newly established jobs** - hazards are unknown due to the lack of experience with the job
- **Modified jobs** - new hazards may exist with changes in job procedures.
- **Infrequently performed jobs** - A job hazard analysis is required prior to non-routine work being performed.

H. ONGOING HAZARD ASSESSMENT

A daily pre-job safety assessment will be conducted by the sites superintendent prior to any work being performed on site, using the Superintendent's Daily Construction Report. This form is used to identify potential hazards specific to the work that is being performed on that day. This form will be filled out by site supervisors and reviewed and signed by the workers.

6. Revisions:

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	July 2022	<ul style="list-style-type: none"> ● Added Section Numbers ● Moved up and revised Section 4: Roles and Responsibilities 	Paul Chiang

		<ul style="list-style-type: none"> • Updated Section 5: Procedure • Added Section 6: Revisions <i>*Changes made to reflect COR 2020 requirements</i>	
Mauricio Carmona	February 2023	<ul style="list-style-type: none"> • Updated Section 5.2: When to Complete a Hazard Assessment • Updated Section 5.4.D: Identify Preventative Controls for Each Task <i>*Changes made to reflect COR 2020 external audit review and findings.</i>	Paul Chiang
Mauricio Carmona	July 2024	<ul style="list-style-type: none"> • Annual review. No changes. 	Paul Chiang
HSE Department	July 2025	<ul style="list-style-type: none"> • Annual review. No changes. 	Paul Chiang

CONTROLS POLICY STATEMENT

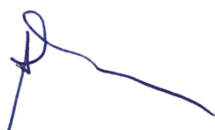
Document Name: Controls Policy Statement	Document Number: SJP79
Prepared by: Mauricio Carmona	Date of Issue: February 2023
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: No Change

M.J. Dixon Construction Limited (MJD) is dedicated to implementing effective controls to eliminate or reduce the risk of occupational health and safety hazards in the workplace. MJDs Management Team recognizes its responsibility to take every precaution reasonable in the circumstances for the protection of a worker and is committed to doing so. Where elimination or substitution of a hazard is not possible, a step-by-step approach to controls will be developed and implemented following the hierarchy of controls while also considering applicable legal and other requirements.

Senior Management at MJD is committed to collaborate with all workplace parties, including supervisors, engineers, equipment operators and workers in the identification, development, and regular review of selected controls to ensure they are successful. MJD will evaluate its control measures at least annually and make improvements as deemed necessary.

Control measures for known hazards will be effectively communicated to affected workplace parties and made readily available at employees at point of use.

This policy will be reviewed annually, and records of review maintained.



MJ Dixon Construction Ltd. – Vice President

July 2025

Date

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	July 2024	<i>Annual Review. No Changes.</i>	Paul Chiang
HSE Department	July 2025	<i>Annual Review. No Changes.</i>	Paul Chiang

CONTROLS PROCEDURE

Document Name: Controls Procedure	Document Number: SJP31
Prepared by: Mauricio Carmona	Date of Issue: August 2022
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: 2

1. Purpose

The purpose of hazard control is to understand:

- Exactly what hazards are present in the workplace,
- How those hazards could result in injury or illness, and
- How to effectively control the risks associated with the hazards identified.

Once hazard controls have been implemented, M.J. Dixon Construction Limited (MJD) will ensure they are working effectively.

2. Scope

MJD develops and implements control measures to reduce risk associated with all identified hazards to an acceptable level. MJD will ensure that health and safety risks and associated control measures are considered when establishing, implementing, monitoring, and maintaining its Occupational Health and Safety Management System (OHSMS).

The hierarchy of controls principle is based on effectiveness and is used when determining control measures; these include:

1. Elimination,
2. Substitution,
3. Engineering controls,
4. Administrative controls, and
5. Personal protective equipment.

Hazard controls applied within this workplace will be assessed to ensure they do not create additional hazards.

3. Definitions

Hazard: Source of harm or anything that can cause injury or illness in people, or damage to property.

Risk: Combination of severity and likelihood of harm.

Risk rating: Degree of risk.

Control of hazards: A systematic process of evaluating the potential risks (based on severity and likelihood) that may be involved in a projected activity or undertaking.

Control: Measures taken to mitigate the severity or likelihood of a hazard causing harm.

Risk Management: A sequential process used to manage risk which includes identification of hazards, the assessment of the level of risk associated with the hazard and the required mechanism(s) to control the hazard by reducing the risk (reduce severity or reduce likelihood).

4. Roles and Responsibilities

Senior Management:

- Review and approve the control of hazards procedure and related documents annually, at minimum, or whenever there are changes.
- Ensure a standardized format is used for recording the findings of the hazard recognition/control of hazards process.
- Determine resources (time and personnel) required for the implementation of the control of hazards procedure (completion, adjustment and review of list or registry)
- Assign roles and responsibilities for the individual(s) directly responsible for determining and implementing the control of hazards.
- Review and approve all controls prior to implementation; approvals will be based on control effectiveness and recommendation by industry professionals.
- Ensure communication to all staff regarding results, and review of the control of hazards process as required.
- Ensure requirements of this procedure are established, implemented, monitored, and maintained.
- Review list or registry being developed and submitted, in order to determine and or approve necessary control actions arising from the risk management process.
- Promote the effective control of hazards and risk-based thinking by ensuring that short-term controls are put in place to protect workers from any imminent hazards while more long-term controls are being implemented.

Supervisors:

- Review and ensure relevant work/tasks in the area have been risk assessed AND controlled appropriately.
- Communicate the control of hazards process and results (control measures) to affected workplace parties to ensure awareness of process and outputs.
- Seek input and feedback from workers and direct reports regarding the review and control of hazards process.
- Ensure control of hazards procedures are proactively completed, determined and planned before performing any task(s) related to the operations and/or activity; and before the introduction, start-up or use of new equipment, material, substance or process for which hazards have been identified.
- Ensure control of hazards are completed, determined, and planned implementation when there is a change to existing equipment, material, chemical, or process; and when there is a change to the occupational health and safety management system that may affect workplace operations and/or activities for which hazards have been identified.
- Ensure results of control of hazards processes are considered and hazard control recommendations are followed in all work.
- Ensure short-term controls are put in place to protect workers from any imminent hazards while more long-term controls are being implemented.
- Promote a risk-based approach with direct reports and ensure workers are aware of the hazards and related risks present in their workplace.

Workers:

- Participate in and contribute to the control of hazards process and outputs as required.
- Apply a risk-based approach to work ensuring control of hazards procedures are proactively completed before performing any task(s) related to the operations and/or activity; and before the

introduction, start-up or use of new equipment, material, substance or process for which hazards have been identified.

- Apply a risk-based approach ensuring that control of hazards is completed when there is a change to existing equipment, material, chemical or process; and when there is a change to the occupational health and safety management system that may affect workplace operations and/or activities for which hazards have been identified.
- Follow direction of Supervisor.

Safety Expert or Designate(s)/Joint Health and Safety Committee or Health and Safety Representative:

- Participate in and contribute to the control of hazards process and outputs as required.
- Develop a standardized format to be used for recording the findings of the control of hazards process (through list/registry) which addresses source considerations such as contributing factors that may cause a low-priority risk to become a high priority risk.
- Include review of related job factors as well as personal factors which may contribute to risks.
- Include a way to identify which hazards present the highest risk and prioritized work to be completed.
- Monitor list/registry to ensure the control of hazards process is carried out and progress is being made.
- Complete any corrective action plans assigned and/or approved by Senior Management, based on the review of the results of the control of hazards process.
- Support the control of hazards process as required.

5. Procedure

5.1 Identifying Hazards

All MJD workers are responsible for immediately reporting actual or potential workplace hazards to a Supervisor.

MJD Supervisors are responsible for addressing any hazards or unsafe work conditions in the workplace and correcting the issue utilizing the following steps:

- Assess the hazard using the Risk Rating Matrix/Scale
- Identify appropriate controls to mitigate the risk
- Implement controls if not already implemented
- Assess the degree of risk to workers after a control is implemented
- Determine whether the hazard is deemed an acceptable risk
- If the risk is not acceptable, develop new controls to mitigate risk and consult professional assistance if required.

5.2 Identifying Controls

Prior to selecting control options, it is essential that MJD Supervisors collect, organize, and review information with workers to determine what types of control measures are available. Information available in the workplace may include:

- Sources such as the OHS standards and guidelines, manufacturers' instructions, and engineering reports to identify potential control measure
- Keeping current on relevant information from trade or professional associations
- Investigating control measures used in other workplaces and determine whether they would be effective within MJD

- Seeking input from MJD management, workers, JHSC members, engineers, etc. who may be able to suggest and evaluate solutions based on their knowledge of the facility, equipment, and work processes.
- Consulting with safety and health experts for more complex issues.

5.3 Selecting Controls

When selecting controls, Supervisors in collaboration with management and workers, shall select controls that are most feasible, effective, and permanent.

The Hierarchy of Controls shall always be consulted when determining the best method to control a hazard. The first consideration should be whether a hazard can be eliminated altogether before seeking other alternatives.

The Hierarchy of Controls has five levels of actions to reduce or remove hazards. The preferred order of action based on general effectiveness is:

1. Elimination – removing hazards at the source that are causing or likely to cause death or serious physical harm.
2. Substitution – replacing the hazard with a safer alternative.
3. Engineering controls – isolating workers from the hazard with modified equipment, ventilation, protective barriers and more.
4. Administrative controls – changing the way people work to reduce the duration, frequency, or intensity of exposure to hazards.
5. Personal protective equipment (PPE) – protecting the worker with personal protective equipment (PPE) to minimize exposure to hazards.

When selecting controls, it is also important to:

- Avoid selecting controls that may directly or indirectly introduce new hazards. Examples include exhausting contaminated air into occupied workspaces or using hearing protection that makes it difficult to hear backup alarms.
- Use a combination of control options when no single method fully protects workers.

5.4 Implement Selected Controls

Once hazard prevention and control measures have been identified, they should be implemented in a timely manner by use of a hazard control plan, job hazard analysis, safe work practice or safe job procedure.

Prior to implementation, all hazard controls are to be reviewed, approved, dated, and signed by Senior Management.

5.5 Communicating Implemented Controls

Senior Management and/or Supervisors are responsible for communicating to all affected workplace parties hazards identified in the workplace as well as measures for control.

In addition to safe work practices and safe job procedures (available through the computer network), all MJD hazards and applicable controls will be recorded and distributed via MJDs Job Hazard Analysis (JHA) Binder. The JHA Binder will be communicated by the Safety Expert or Site Supervisors/Superintendents to all affected personnel.

All communication made shall be documented through formal training records, meeting minutes, hazard and risk assessment acknowledgment and tailgates/toolbox talks (HSM003-Toolbox Safety Meeting).

All documents and records shall be maintained as per the **Control of Records and Documents Procedure**.

5.6 Making Controls Available

The Safety Expert and Site Supervisors/Superintendents shall ensure that all newly implemented controls are available to workers at point of use through:

- Written and approved safe work practices or safe job procedures
- Written and approved JHA Binder
- Installation of signs, alarms, and warnings
- PPE

Workers are responsible for becoming familiar with and following all MJDs policies, Safe Job Procedures and Safe Work Practices and the controls used to reduce the risk associated with any given hazard. Controls that include PPE shall be worn and maintained in accordance with manufacturer instructions.

6. Forms

MJD uses the following forms to determine and track the implementation of hazard controls:

- HSF001: PHA;
- HSF020: Hazard/Best Practice Report - (On Occurrence/Monthly);
- HSF022-Incident/Accident Report (On Occurrence);
- HSF033: Corrective Action Form;
- HSF036: Workplace Hazards Inspection Form;
- HSM002: Quarterly JHSC Meeting Minutes.

Hazard controls can also be found in MJDs Job Hazard Analysis Binder (SJP69).

7. Revisions

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	February 2023	<ul style="list-style-type: none"> • Updated Section 4: Roles & Responsibilities for Senior Management • Updated 5.2: Identifying Controls • Updated 5.3: Selecting Controls • Updated Section 5.4: Implement Selected Controls • Updated Section 5.6: Making Controls Available • Added Section 7: Revisions <i>*Changes made to reflect COR 2020 external audit review and findings.</i>	Paul Chiang
Mauricio Carmona	July 2024	<ul style="list-style-type: none"> • Annual review. No changes. 	Paul Chiang

HSE Department	July 2025	<ul style="list-style-type: none">Added HSF020, HSF022 and HSM002 to Section 6: Forms.	Paul Chiang
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SAFE WORK PRACTICES PROCEDURE

Document Name: Safe Work Practices Procedure	Document Number: PJP76
Prepared by: Mauricio Carmona	Date of Issue: August 2022
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: No Change

Purpose

Safe work practices (SWP) will be used as a control measure for hazards identified in the Job Hazard Analysis. The review of relevant safe work practices will be part of training workers to perform their tasks safely.

Scope

The SWPs apply to all MJ Dixon Construction Limited employees.

Definitions

Safe Work Practices – Ways in which something is done in the workplace in order to ensure worker safety. A set of positive guidelines or “dos and don’ts” on how to perform a specific task that may not always be done in a certain way.

Review of Safe Work Practices

All workers will review the safe work practices that relate to their job during orientation. Supervisors are responsible for ensuring their workers understand the safe work practices that apply to their specific tasks, prior to the workers performing those tasks. Safe work practices will be available at all work locations.

As workers review the safe work practices, they are encouraged to report any concerns or suggested changes to their supervisor. The supervisor will then make suggestions to the JHSC, and the JHSC will implement the required changes.

Safe Work Practices can be found in the Safe Work Practices & Safe Job Procedures Manual.

Annual Review

The safe work practices will be reviewed annually by management to ensure they are accurate and still reflect the company’s scope of work. Management will suggest any required changes to the JHSC. The JHSC will then determine the changes to be made and will develop the changes. Any new or modified safe work practices will be communicated to all affected workers.

Responsibilities

Management

- Support the development of Safe Work Practices.
- Review the Safe Work Practices annually.

Supervisors

- Ensure their workers have reviewed the safe work practices that relate to their specific workplace and tasks.

- Review comments/concerns of the workers regarding the safe work practices with the JHSC and make changes as required.
- Have the safe work practices readily available to their workers.

Workers

- Review and understand the safe work practices that relate to their specific job.
- Follow the safe work practices while performing their job tasks.
- Report concerns or suggested changes to the safe work practices to their supervisor

Revisions:

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	July 2023	<i>Annual Review. No Changes.</i>	Paul Chiang
Mauricio Carmona	July 2024	<i>Annual Review. No Changes.</i>	Paul Chiang
HSE Department	July 2025	<i>Annual Review. No Changes.</i>	Paul Chiang

Safe Job Procedures Program

Document Name: Safe Job Procedures Program	Document Number: SJP77
Prepared by: Mauricio Carmona	Date of Issue: August 2022
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: No Change

Purpose

Safe job procedures (SJP) will be used to control the hazards for the critical tasks identified in the Job Hazard Analysis. The review of relevant safe job procedures will be part of training workers to perform their tasks safely.

Scope

The SJPs apply to all MJ Dixon Construction Limited employees.

Definitions

- **Safe Job Procedures** - the step-by-step instructions that must be followed in sequence in order to complete a task or process safely. A written, step by step description of how to complete a job safely and efficiently from start to finish.
- **Critical Task** – a task that, if not accomplished following the specified safe job procedure, has the potential to result in a serious adverse effect. A job with high potential for serious loss or injury.

Review of Safe Job Procedures

Workers will review the safe job procedures that relate to their job during orientation. Supervisors are responsible for ensuring their workers understand the safe job procedures that apply to their specific site and tasks, prior to the workers performing that task. The safe job procedures will be reviewed through the. Safe job procedures will be available at all work locations.

As workers review the safe job procedures, they are encouraged to report any concerns or suggested changes to their supervisor. The supervisor will then make suggestions to the JHSC, and the JHSC will implement the required changes.

Safe Job Procedures can be found in the Safe Work Practices & Safe Job Procedures Manual.

Annual Review

The safe job procedures will be reviewed annually by management to ensure they are accurate and still reflect the company's scope of work. Management will suggest any required changes to the JHSC. The JHSC will then determine the changes to be made and will develop the changes. Any new or modified safe job procedures will be communicated to all affected workers.

Responsibilities

Management

- Support the development of Safe Job Procedures.

- Review the Safe Job Procedures annually.

Supervisors

- Ensure their workers have reviewed the safe job procedures that relate to their specific workplace/tasks.
- Review comments/concerns of the workers regarding the safe job procedures with the JHSC and make changes as required.
- Have the safe job procedures readily available to their workers.

Workers

- Review and understand the safe job procedure that relate to their specific job.
- Follow the safe job procedures while performing any critical tasks.
- Report concerns or suggested changes to the safe work practices to their supervisor.

Revisions:

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	July 2023	<i>Annual Review. No Changes.</i>	Paul Chiang
Mauricio Carmona	July 2024	<i>Annual Review. No Changes.</i>	Paul Chiang
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Occupational Health Procedure

Document Name: Occupational Health Procedure	Document Number: PS004
Prepared by: Mauricio Carmona	Date of Issue: August 2022
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: No Change

PURPOSE:

The purpose of this procedure is to protect the health and safety of the employees at MJ Dixon Construction Limited with regards to occupational health hazards.

SCOPE:

This procedure applies to all MJ Dixon Construction Limited employees.

DEFINITIONS:

- **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.

RISK ASSESSMENT

A job hazard analysis has been completed for all tasks performed at MJ Dixon Construction Limited, which includes the risk of occupational health hazards. Controls for these hazards have also been identified in the job hazard analysis. The job hazard analysis will establish controls such as: elimination, substitution, engineering, administration, and PPE to assist employees on working in a safe workspace.

A risk assessment must be conducted for newly identified occupational health hazards and must be added to the existing job hazard analysis.

SAFE JOB PROCEDURES

The SWP/SJP binder includes safe job procedures for the following occupational health hazards:

- Physical Agents
- Biological Agents
- Lead
- Asbestos
- Silica
- Workplace Chemicals (includes spill response, handling and storage, etc.)
- Confined Space

PHYSICAL AGENTS

Physical agents are sources of energy that may cause injury or disease. Examples include noise, vibration, radiation, and extremes in temperature. Physical agents become the most hazardous when a worker is exposed to them for a longer period of time. (Refer Safe Job Procedure for detail)

BIOLOGICAL AGENTS

Sources of biological hazards may include bacteria, viruses, insects, plants, birds, animals, and humans. These sources can cause a variety of health effects ranging from skin irritation and allergies to infections (e.g., tuberculosis, AIDS), cancer, etc. (Refer Safe Job Procedure for detail) **O. Reg. 149/12**

LEAD

Lead has been commonly used for many industrial and commercial purposes, primarily because it is widely available, easy to extract, and easy to work with. Two routes of entry are of major concern: inhalation and ingestion.

A significant portion of lead that is inhaled or ingested gets into the bloodstream. Once in the bloodstream, lead circulates through the body and is stored in various organs and body tissues. Some of this lead is filtered out of the body and excreted, but some remains in the blood and tissues. As exposure continues, the amount stored will increase if the body absorbs more lead than it excretes. The lead stored in the tissue can slowly cause irreversible damage, first to individual cells, then to organs and whole body systems. (Refer Safe Job Procedure for detail) **O. Reg. 490/09**

ASBESTOS

Asbestos refers to a group of naturally occurring minerals once used widely in the construction industry. Asbestos is found small fibers and clumps of fibers which may be released into the air as dust during construction. Asbestos fibers are easily inhaled and carried into the lower regions of the lung which overtime can cause fibrotic lung disease and changes in the lining of the chest cavity. These diseases can lead to reduced respiratory function and death. Long-term inhalation of asbestos fibers also increases the risk of lung cancer and mesothelioma. (Refer Safe Job Procedure for detail)

Operations that may expose a worker to asbestos are classified as Type 1, Type 2 and Type 3 operations. **O. Reg. 278/05, s. 12 (1).**

The following are Type 1 operations:

- Installing or removing ceiling tiles that are asbestos-containing material, if the tiles cover an area less than 7.5 square metres and are installed or removed without being broken, cut, drilled, abraded, ground, sanded or vibrated.
- Installing or removing non-friable asbestos-containing material, other than ceiling tiles, if the material is installed or removed without being broken, cut, drilled, abraded, ground, sanded or vibrated.
- Breaking, cutting, drilling, abrading, grinding, sanding or vibrating non-friable asbestos-containing material if,
 - the material is wetted to control the spread of dust or fibres, and
 - the work is done only by means of non-powered hand-held tools.
- Removing less than one square metre of drywall in which joint-filling compounds that are asbestos-containing material have been used. **O. Reg. 278/05, s. 12 (2).**

The following are Type 2 operations:

- Removing all or part of a false ceiling to obtain access to a work area, if asbestos-containing material is likely to be lying on the surface of the false ceiling.
- The removal or disturbance of one square metre or less of friable asbestos-containing material during the repair, alteration, maintenance or demolition of all or part of machinery or equipment or a building, aircraft, locomotive, railway car, vehicle or ship.
- Enclosing friable asbestos-containing material.
- Applying tape or a sealant or other covering to pipe or boiler insulation that is asbestos-containing material.

- Installing or removing ceiling tiles that are asbestos-containing material, if the tiles cover an area of 7.5 square metres or more and are installed or removed without being broken, cut, drilled, abraded, ground, sanded or vibrated.
- Breaking, cutting, drilling, abrading, grinding, sanding or vibrating non-friable asbestos-containing material if,
 - the material is not wetted to control the spread of dust or fibres, and
 - the work is done only by means of non-powered hand-held tools.
- Removing one square metre or more of drywall in which joint filling compounds that are asbestos-containing material have been used.
- Breaking, cutting, drilling, abrading, grinding, sanding or vibrating non-friable asbestos-containing material if the work is done by means of power tools that are attached to dust-collecting devices equipped with HEPA filters.
- Removing insulation that is asbestos-containing material from a pipe, duct or similar structure using a glove bag.
- Cleaning or removing filters used in air handling equipment in a building that has sprayed fireproofing that is asbestos-containing material.
- An operation that,
 - is not mentioned in any of paragraphs 1 to 10
 - may expose a worker to asbestos, and
 - is not classified as a Type 1 or Type 3 operation. O. Reg. 278/05, s. 12 (3).

The following are Type 3 operations:

- The removal or disturbance of more than one square metre of friable asbestos-containing material during the repair, alteration, maintenance or demolition of all or part of a building, aircraft, ship, locomotive, railway car or vehicle or any machinery or equipment.
- The spray application of a sealant to friable asbestos-containing material.
- Cleaning or removing air handling equipment, including rigid ducting but not including filters, in a building that has sprayed fireproofing that is asbestos-containing material.
- Repairing, altering or demolishing all or part of a kiln, metallurgical furnace or similar structure that is made in part of refractory materials that are asbestos-containing materials.
- Breaking, cutting, drilling, abrading, grinding, sanding or vibrating non-friable asbestos-containing material, if the work is done by means of power tools that are not attached to dust-collecting devices equipped with HEPA filters.
- Repairing, altering or demolishing all or part of any building in which asbestos is or was used in the manufacture of products, unless the asbestos was cleaned up and removed before March 16, 1986. O. Reg. 278/05, s. 12 (4).

Asbestos on Construction Projects, Regulation 278/05

SILICA

Silica dust and particles are a hazard on many jobsites. **O.Reg. 490/09**

Silica dust and particles are generated from

- cutting and drilling concrete
- sandblasting concrete
- cutting and drilling masonry
- grinding concrete and masonry
- sanding drywall.

If we breathe silica dust and particles into our lungs often enough and long enough, we can get a disease caused silicosis. Silicosis is a disabling, progressive, non-reversible, often deadly lung disease. You may show no symptoms in the early stages and severe breathing problems in the later stages. Many workers with silicosis can develop other health problems such as tuberculosis and lung cancer. They can also develop complications such as heart disease. (Refer Safe Job Procedure for detail)

WORKPLACE CHEMICALS

Every workplace has chemicals, if chemicals are not used, stored and handled properly, they can cause injury, illness, disease, fire, explosions, or property damage. Information of the hazards of chemicals and appropriate precautions to take to work safely and avoid injury will be given to workers as required. Workplace Hazardous Materials Information System (WHMIS) provides health and safety information on hazardous products intended for use, handling, or storage in workplaces. (Refer Safe Job Procedure for detail) **O. Reg. 36/93**

WHMIS Compliance Plan

All workers entering the project shall carry proof of WHMIS Training.

All subcontractors shall provide un-expired Material Safety Data Sheets for all WHMIS controlled products to be brought on site, to MJ Dixon Construction Limited project superintendent or his competent replacement, before these controlled products are stored or used on the project. All subcontractors shall ensure WHMIS controlled products have their required supplier and workplace labels affixed to the outer containers.

All subcontractor supervisors are to provide site-specific instruction to their workers on the storage, handling, use and disposal of any WHMIS controlled products brought on site.

MJ Dixon Construction Limited project superintendent or his competent replacement will require each subcontractor to provide written evidence, workers have received generic and site specific instruction for their worker's safety.

MJ Dixon Construction Limited project superintendent or his competent replacement will post all SDS documents in a conspicuous area to allow unrestricted access and review to all workers on the project.

All subcontractors are to use the designated storage areas provided to them by the Constructor. Any WHMIS controlled products not in use shall be kept under storage. Appropriate fire extinguisher equipment shall be provided near these storage areas.

MJ Dixon Construction Limited project superintendent or his competent replacement, in consultation with the Joint Health and Safety Committee for the project (if and when established), shall periodically review the suitability of the WHMIS training and practices in place by the subcontractor on site, keeping in mind that the results of such training and instruction provided, must enable the workers to use the information in a performance based manner to protect their health and safety.

All subcontractor shall have written procedures to be followed by their workers, where fugitive emissions from a controlled product, poses a risk to the workers' health and safety.

All subcontractor shall also have written procedures to be followed by their workers in case of an emergency involving a controlled product.

Failure to follow safe work procedures in the use, storage, handling or disposal of a controlled product by a subcontractor employee will cause disciplinary measures to be taken against the worker and supervisor of the subcontractor.

CONFINED SPACE

A confined space is defined as a place:

- a) that is partially or fully enclosed
- b) that is not both designed and constructed for continuous human occupancy, and
- c) where atmospheric hazards may occur because of its construction, location, or contents, or because of work that is done in it.

All three criteria have to be met before a space is defined as a confined space. Both physical and atmospheric hazards may exist in a confined space. Prior to entering a confined space, a confined space program must be in place, workers must be adequately trained, have the required personal protective equipment available and must have a rescue plan. (Refer Safe Job Procedure for detail) **O. Reg. 95/11**

TRAINING

All workers will be trained in WHMIS 2015 as part of their orientation. Workers will also be required to review the safe work practices and safe job procedures for the occupational health hazards that relate to their specific job tasks. Asbestos awareness training will be taken by workers who may come in contact with asbestos. This will be used as a refresher training and will be taken yearly.

SITE OCCUPATIONAL HAZARDS

Prior to starting work at a site, the site superintendent must ensure there is:

- Adequate toilet/wash-up facilities.
- Adequate supply of potable drinking water.
- SDS are readily available on site.

Revisions:

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Mauricio Carmona	July 2023	<i>Annual Review. No Changes.</i>	Paul Chiang
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HSE Department	July 2025	<i>Annual Review. No changes.</i>	Paul Chiang

CHAPTER THREE

PROCUREMENT AND CONTRACTOR MANAGEMENT

PROCUREMENT AND CONTRACTOR MANAGEMENT POLICY STATEMENT

Document Name: Procurement and Contractor Management Policy Statement	Document Number: SJP17
Prepared by: Mauricio Carmona	Date of Issue: August 2022
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: No Change

M.J. Dixon Construction Limited (MJD) recognizes the importance of selecting service providers that share the same health and safety values as our Company. Therefore, contractors and subcontractors will be selected, monitored, and evaluated according to specific OHS criteria outlined in MJDs Procurement and Contractor Management Procedure.

MJDs Procurement and Contractor Management Procedure will ensure contactors, subcontractors, management, and workers take all reasonable precautions for the health and safety of persons, including workers, visitors, and the public, and for the protection of property. The program will also ensure that while performing work on MJD property, contractors, subcontractors, and their employees perform work that adheres to the requirements of all relevant Acts, regulations and Company policies and procedures.

All contractors, subcontractors and their employees will be monitored and evaluated for their performance while on MJD job site. Communication will be made to relevant workplace parties when changes have occurred.

This policy and corresponding procedure will be reviewed at least annually.



MJ Dixon Construction Ltd. – Vice President

July 2025

Date

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Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	July 2023	<i>Annual Review. No Changes.</i>	Paul Chiang
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PROCUREMENT AND CONTRACTOR MANAGEMENT PROCEDURE

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Prepared by: Mauricio Carmona	Date of Issue: August 2022
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
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1. Purpose

The purpose of this program is to ensure that contractors, management, and workers at M.J. Dixon Construction Limited (MJD) take all reasonable precautions for the health and safety of persons, including workers, visitors and the general public, and for the protection of people.

2. Scope

This procedure applies to all workers, contractors, and subcontractors on all MJD sites and locations.

3. Definitions:

Construction: includes erection, alteration, repair, dismantling, demolition, structural maintenance, painting, land clearing, earth moving, grading, excavating, trenching, digging, boring, drilling, blasting, or concreting, the installation of any machinery or plant, and any work or undertaking in connection with a project but does not include any work or undertaking underground in a mine. (OHSA, s.1)

Constructor: a person who undertakes a project for an owner and includes an owner who undertakes all or part of a project by himself or by more than one employer. The Constructor is the person with overall authority for health & safety matters on a project and takes on the responsibility of managing health & safety. A Constructor is also Contractor. (OHSA, s.1)

Contractor: Any individual or firm engaged by MJD on a contract to perform work. This term applies to all contractors, contractor employees and any sub-contractors hired by the contractor.

Project: means a construction project, whether public or private, including, a) the construction of a building, bridge, structure, industrial establishment, mining plant, shaft, tunnel, caisson, trench, excavation, highway, railway, street, runway, parking lot, cofferdam, conduit, sewer, watermain, service connection, telegraph, telephone or electrical cable, pipe line, duct or well, or any combination thereof, b) the moving of a building or structure, and any work or undertaking, or any lands or appurtenances used in connection with construction. (OHSA, s.1)

Project Manager: means an employee (Manager) who is responsible for contracting the work and oversees the contract.

4. Roles and Responsibilities

Senior Management:

- Develop occupational health and safety (OHS) criteria for selecting, monitoring and evaluating contractors/service providers in collaboration with the Safety Expert or Designate(s), that includes:
 - I. The ability and competency of the contractor to be able to assess/analyze and control hazards arising from their own work that may impact the organizations workers; and,
 - II. The ability and competency of the contractor to be able to assess/analyze and controls hazards arising from the organizations work that may impact the contractor's workers
- Ensure contractors have a good health and safety program, WSIB coverage, and meet organizational standards
- Identify hazards, risks competency, and the ability of the contractor to control risks to the contractor and their workers, from the contracted work
- Create protocols for communicating organizational procedures, emergency plans, health and safety notifications, and changes affecting the employer's workplace, to the contractor
- Monitor and evaluate contractor safety performance, and building accountabilities (e.g., performance rating system, contract incentives)
- Ensure that the requirements of the Procurement and Contractor Management Program and all relevant legislated obligations are carried out with respect to the contracted work, including provision of required resources

Supervisors/Managers:

- Document consequences, and communicate unsafe behaviours/non-compliance with relevant legislation
- Participate in all required training, and ensure that all aspects of health and safety, in relation to the Procurement and Contractor Management Program, are implemented and enforced

Safety Expert or Designate:

- Assist with the Procurement and Contractor Management program, as requested and required
- Obtaining, where relevant, any health & safety policies and procedures from the contractor, and sharing with all necessary stakeholders, as required
- Ensure that any contracted work conforms to all relevant laws and regulations
- Obtain an accurate record of a potential contractor's past health & safety performance, and share this record with all necessary stakeholders, as required
- Notify the appropriate authorities of any accidents/incidents involving employees and/or contractor employees, as per the Incident Response and Reporting procedures
- Participate in an annual continuous improvement activities related to the Procurement and Contractor Management Program
- Conduct hazard risk assessments associated with contractual work and creating necessary controls based on assessment results
- Ensure that any contracted work minimizes legal risk for the company

Joint Health and Safety Committee (JHSC):

- In cooperation with the Project Manager and Contractor, conduct monthly workplace inspections, document findings on the Inspection Checklist and producing a Workplace Inspection Report
- Share copies of all reports with the contractor and relevant workplace parties
- Participate in annual continuous improvement activities related to the Procurement and Contractor Management Program

Workers:

- Report all contractor-related health & safety hazards, as soon as practicable, to the Contractor Site Supervisor and MJD Management
- Follow a contractor-related accident/incident, the worker (and/or contract employee) shall, as soon as practicable, report to the Contractor Site Supervisor and MJD Management
- To the extent that the contracted work falls under their purview, the worker shall, as soon as practicable, report to the Contractor Site Supervisor and an MJD Manager/Supervisor, any deviation from the Procurement and Contractor Management Program
- Participate in any health & safety training required by the Employer and/or Contractor/Constructor
- Follow all applicable health & safety policies, procedures, and legislated duties, as required

CONSTRUCTION PROJECT SPECIFIC ROLES & RESPONSIBILITIES

Project Owner:

- Ensure for every construction project that the “constructor” is clearly identified (either the owner/employer or contractor), and the overall authority and responsibility for health & safety matters is established, and recorded in the written contract and other relevant documentation
- Ensure for every construction project that a JHSC and/or HSR is established, as required
- Ensure that the MOL is notified of every construction project, as required
- Ensure that the prospective contractors and subcontractors obtain a list of designated substances, as required, prior to entering a binding contract
- Ensure that emergency procedures are established, communicated, and posted
- Ensure that security and site access procedures are established, communicated, and posted
- Ensure for every construction project with five or more workers that a competent supervisor is appointed
- Notify the appropriate authorities/persons of any accidents/incidents, as required
- Provide a copy of the Contractor Checklist in all bid and pre-qualification contractor documents, as outlined in Stage 1 of the Procurement and Contractor Management Program
- Keep copies of all completed forms and relevant documentation pertaining to this program for reference

Project Manager:

- Ensure that any contracted work performed under their authority or control conforms to the requirements of this policy and program (e.g., conducting training sessions with the contractor as required)
- If delegated to Contractor, filing a Notice of Project Form with the MOL, and share copies with relevant workplace parties
- Ensure that a copy of the Notice of Project Form is posted at the entry point of the project site
- Ensure all stages of this program are completed
- Ensure that necessary levels of supervisory monitoring is performed
- Conduct regular meetings and communications with the contractor to monitor health & safety performance
- Ensure that relevant contractor safety policies, procedures, and plans are implemented, and responsibilities delegated
- In conjunction with the contractor, ensuring that health & safety risk assessments are conducted, relevant information is shared, training is provided, and proper controls/corrective actions are taken to protect the health & safety of all workers/employees
- Ensure the pre-commencement meeting and checklist is completed prior to commencing work, as outlined in Stage 2 of this program
- Monitor contractor performance and keep a record, as outlined in Stage 3 and 4 of the programs

- Report to the Employer any performance issues and concerns, as outlined in Stage 3 of this program
- Notify the appropriate authorities/persons of any accidents/incidents, as per the Incident Response and Reporting Procedure
- In conjunction with a management representative of the Contractor, conduct and/or ensure regular workplace inspections are completed and documented, and timely corrective actions are taken
- In conjunction with a management representative of the Contractor, conduct and/or ensure accident/incident investigations are completed and documented, and timely corrective actions are taken
- Order workers/employees to stop unsafe work and remove any person from the worksite, as required for the protection of health & safety; any work stoppage will be notified to the contractor and employer immediately
- Discuss, implement and document, in collaboration with the Contractor, appropriate corrective action and discipline, as required, in relation to unsafe work
- Lead the coordination and integration of multiple contractors with respect to site-specific OHS requirements on multi-employer workplaces, including but not limited to: establishing roles and responsibilities for all involved and confirming that each team member knows how to address hazards they may encounter, daily work planning and providing project safety orientation
- Participate in annual continuous improvement of the Procurement and Contractor Management Program
- Follow all applicable health & safety policies, procedures, and legislated duties, as required

Contractor (Management Lead of the Contractor):

- Accept/sign-off on documentation by the contractor to abide by the employer's health and safety program and/or rules and regulations at the worksite
- Communicate relevant health and safety information to relevant workplace parties when there are changes affecting the health and safety of the work
- Ensure that any contracted work performed under their authority or control conforms to the requirements of the company and its Procurement and Contractor Management Program, and all relevant legislated obligations
- File a Notice of Project Form with the MOL and share copies with relevant workplace parties
- Ensure that relevant Contractor and/or company safety policies, procedures, and plans are implemented, and responsibilities delegated to a competent person who is suitably trained to carry out their duties
- Notify the Project Manager immediately when any change in the work occurs or is proposed
- Participate in employer training sessions with the project manager or delegate, as required
- In conjunction with the Employer, ensuring that health & safety risk assessments are conducted, relevant information is shared with workers, training is provided, and proper hazard analysis and controls are taken to protect the health & safety of all workers/employees (as per Element 2: Hazard Assessment, Analysis and Control; and Element 3: Controls.)
- Share copies of risk assessments with the project manager, HR Department, and the JHSC/HSR
- Participate in all Stages of this program
- Participate in and/or facilitate health & safety meetings, training, enquiries, monitoring, auditing, workplace inspections, accident/incident investigations etc., as required
- Notify the appropriate authorities/persons of any accidents/incidents, as per the Incident Response and Reporting Procedure
- In conjunction with the Project Manager or delegate, conduct accident/incident investigations, as required
- In conjunction with Project Manager or delegate, conduct and/or ensuring regular workplace inspections are conducted, and timely corrective actions are taken
- Report, as soon as practicable, to Project Manager or delegate, any deviation from this program
- Order workers/employees to stop unsafe work and remove any person from the worksite as required for the protection of health & safety
- Notify the Project Manager immediately of a work stoppage, and discussing and implementing appropriate corrective action and discipline, as required

- Documenting all work stoppage event using the appropriate forms, as required
- Notify the Project Manager immediately when any enforcement agency conducts visits, meetings, inspections or investigations, etc.
- Follow all applicable health & safety policies, procedures, and legislated duties, as required

Contract Employees:

- Report all health & safety hazards as soon as practicable to the Contractor site Supervisor using the appropriate forms, as required
- Participate in all health & safety meetings, training, enquiries, monitoring, auditing, workplace inspections, accident/incident investigations, etc., as required
- To the extent that the contracted work falls under their purview, as soon as practicable, reporting to the Contractor Site Supervisor any deviation from this program
- Participate in any health & safety training required by the Employer and/or Contractor/Constructor

Subcontractors:

- Complete all stages of the Procurement and Contractor Management Program
- Perform a portion of the work, under contract
- Provide all tools, equipment, and any materials not supplied by the project owner
- Exercise all precautions necessary to prevent injury and/or illness to himself, workers, and all others on site
- Comply with all health and safety requirements of the OSHA and any other applicable authority
- Before commencing work and during its progress, inspect the work site and report to the Contractor's Project Manager or other jobsite representative any safety hazards
- Correct any safety hazards before commencing work on the project
- Report all injuries and or illnesses to the Contractor's Project Manager, as well as their own company representative
- Remove any hazardous materials, containers, or waste from the project site and dispose of properly at the subcontractor's own expense

5. Procedure

Potential contractors will be provided with a copy of this policy during the bidding process.

TYPES OF CONTRACTORS

The types of contractors employed by MJD can be classified into two groups:

- 1. Maintenance and Service Work** – Includes services provided under contract such as snow removal services, electricians, custodial services, security, heating & ventilation, professional services (such as accounting, management/business, legal, nursing, physiotherapy, etc.)
 - a. They are usually employed for set periods of time, as determined by the terms and conditions of the contract
 - b. Services provided on an ad hoc basis, such as plumbers, appliance repair persons, water main breaks, or minor general repair, who are employed periodically for short term assignments
- 2. Construction Project** – Includes construction contractors and are employed to carry out a specific project.
 - a. Examples include construction of a building, installation of elevator or replacement of boilers and other major mechanical equipment

PROCUREMENT & CONTRACTOR MANAGEMENT PROGRAM

There are four stages in the Contractor Management Program:

Stage 1 - Awarded Contract and Pre-Qualification Submittal

Successful contractors/subcontractors will be sent a contract, engagement letter and **APPENDIX S “Contractor Safety Requirements”**. The contractor/subcontractor will also be required to submit pre-qualification documents to help determine if a contractor/subcontractor is competent and/or likely to perform the work in accordance with occupational health and safety requirements prior to starting on site. Acceptance of this documentation shall be viewed as acknowledgement that the contractor has submitted the required documentation as per contract specifications. These documents may include, but are not limited to:

- Detailed project site-specific safety plans
- Comprehensive hazard assessment of the project phases including a plan to mitigate/control hazards arising from the work (contractor's or organization's) that may impact the health and safety of workers
- Training and qualification
- Subcontractor management to ensure site-specific expectations will be communicated and enforced

The contractor's site-specific safety plan must identify associated hazards and preventative measures/controls. If the scope of work changes throughout the project the contractor shall reassess all existing and new hazards and resubmit to the Project Manager.

Documents sent to the contractor/subcontractor include a Subcontractor Acknowledgement Form and a Prequalification Checklist that must be approved by the Health and Safety Expert or Delegate after submission (**Forms: HSF040, Form HSF039**).

***For construction projects, preference will be given to contractors who have achieved the IHSA “Certificate of Recognition (COR)”: IHSA COR Certification.*

Stage 2 – Pre-commencement Meeting

After a contract has been awarded but prior to the job commencing, a pre-commencement meeting shall be conducted and recorded by the applicable Department Representative with the successful contractor/subcontractor or constructor. MJDs Safety Expert or Delegate may also assist in this regard.

The following topics may be reviewed with the contractor, but are not limited to the following:

- Review of work scope
- Scheduling and coordination of work
- OSHA roles and responsibilities
- Confirmation of site Supervisor
- Site-specific hazards and controls for each work phase
- Safe job procedures for each work phase (i.e., fall protection, demolition, confined space entry, asbestos abatement, etc.)
- Review of the site-specific safety plan (i.e., emergency procedures/response, first aid, orientation to site, personal protective equipment (PPE), training certifications, etc.)
- Required permits
- Traffic Control Plan (if applicable)
- Site security, site access, public safety, and storage considerations
- Inspection requirements (tools, equipment, PPE)

- Incident reporting

Stage 3 – Performance Monitoring

During the contract, MJD's Project Manager or delegate will monitor the contractor's performance on a regular basis, documenting issues and concerns utilizing forms **HSF008 - Weekly Contractor Submittals**, **HSF005 – Site Orientation Checklist**, and **HSF002 – Daily Construction Report**, **HSF003 – Weekly Supervisor Workplace Inspection** and **QHSE-F016-Non-Compliance Report (On-Occurrence)**. Health and safety performance and worksite monitoring may consist of any of the following:

- Health and safety audit,
- Workplace inspection, or
- incident/accident investigation.

The occupational health and safety performance and practices of a contractor, subcontractor, constructor or any related work will be monitored in order to confirm that the contractor/subcontractor or constructor has complied with health & safety policies and best practices and complied within this program.

The Project Manager or delegate will conduct and document the monitoring activities.

Worksite Hazard Assessment and Control

All contractor work activities on a MJD project site must be subject to a hazard assessment process whereby the hazards and corresponding controls are documented for individual tasks and as applicable, for individual steps or stages in more complex tasks. MJD typically refers to this as a Job Hazard Analysis (JHA) but Contractors may apply other labels to this type of documented task-based hazard assessment. The Contractor's JHA (or JHA equivalent) should:

- Identify and evaluate hazards (organizations or contractors) across the scope of a job or task that may impact workers health and safety
- Provide a control(s) for each hazard identified
- Be documented and distributed in such a way that they are available for review by field workers prior to conducting the applicable job
- Be reviewed prior to the applicable job

Daily Field Level Assessment/ Pre-Job Hazard Assessment is required to be submitted to the Site Management on the weekly basis. The PHA shall be present on site for review upon request. Should contractor's activities extend beyond 3 months, the contractor is mandated to perform and submit a safety inspection report performed by the contractor's in-house safety professional. This inspection is to qualify compliance with MJD safety standards as well as the contractor's own safety protocols.

Additional site identification and control measures will be required by the contractor as activities, operations and site conditions change affecting the health and safety of the work. These site-specific hazards shall be documented, provided to MJDs Project Manager and communicated immediately with affected workplace parties at the site on how they will be managed. For more information, see **Management of Change** below.

Contractors are required to report all incidents (loss or near misses) which occur on MJD worksites. Contractors are required to investigate incidents and provide documentation to the Project Manager. The Incident Reporting Form is to be completed for all contractor health & safety incidents or infractions. Copies of all Incident Reporting Forms must be retained in the bid file by Project Manager and copy sent to MJDs Safety Expert.

MJD retains the right to stop the contractor/constructor work without penalty to MJD if the contractor/constructor does not comply with the Occupational Health and Safety Act and Regulations, all applicable MJD and contractor/constructor company policies/procedures, industry best practices/standards, or creates an unacceptable health and safety condition. Depending on the severity of the risk and prior to stopping work, the project manager or delegate may consult with MJDs Legal Dept. and/or Purchasing Dept.

Stage 4 - Post Contract Performance Evaluation

A post contract performance evaluation (**Form HSF041**) shall be conducted, recorded, signed and retained in the bid file by the Project Manager, Site Super, the Safety Expert or Delegate and Vice President. The assessment report will be communicated to the contractor/subcontractor in order to demonstrate the outcome and describe actions that are expected (i.e., safety, quality and on-time delivery). As a result of documented poor performance (score of 56% or less), the contractor/constructor may be disqualified from bidding on future work for MJD.

The list of unqualified contractors/subcontractors will be sent to the estimation department for reference. In exceptional cases, proof of competency, a completed action plan and commitment by the contractors Senior Management Team will need to be submitted by unqualified bidders in order to be reconsidered for an awarded contract by MJD.

MJD reserves the right to:

- Disqualify a contractor based on past performance
- Obtain documentation and evidence to demonstrate that the contractor/constructor complies with the Procurement and Contractor Management Program requirements

Note: For more information on contractor/subcontractor compliance, refer to **APPENDIX A.**

Management of Change

Changes made to the initial scope of the contract document (i.e., schedule, workforce, trade materials, equipment, permits, etc.) affecting the health and safety of the work shall be made with the Project Manager's or Safety Experts approval. The Job Hazard Analysis and competency of all main personnel re-evaluated for effectiveness.

A meeting regarding the changes and proof of sign-off (via meeting minutes) for those involved with the work is required indicating that they understand that change.

Continuous Improvement

- MJD's Management Team in consultation with the Safety Expert or Delegate, will develop an effective and on-going system to identify and track program gaps and corrective actions
- The system will be well-documented, and records kept
- The Procurement and Contractor Management Program will be annually reviewed and updated, as required – relevant workplace parties will be consulted during this review
- In addition to a thorough program review, past incidents and identified gaps will be reviewed for areas of improvement – Corrective actions will be developed and assigned to appropriate management
- Changes and updates to the program will be documented and records kept
- Results of the program review will be documented and shared with Senior Management and the JHSC

6. Revisions

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	February 2023	<ul style="list-style-type: none"> Updated Project Manager Responsibilities Updated Stage 1 - Awarded Contract and Pre-Qualification Submittal Updated Stage 2: Pre-Commencement Meeting Updated Stage 3: Performance Monitoring Added Management of Change Added Section 6: Revisions <p><i>*Changes made to reflect COR 2020 external audit review and findings.</i></p>	Paul Chiang
Mauricio Carmona	July 2024	<ul style="list-style-type: none"> Updated Section 5: Procedure; Stage 3: Performance Monitoring to include contractor requirements for activities extending beyond 3 months on project site. 	Paul Chiang
HSE Department	July 2025	<ul style="list-style-type: none"> Annual review. No change. 	Paul Chiang

APPENDIX A: MJD SUBCONTRACTOR HSE COMPLIANCE FLOWCHART



M.J. Dixon Sub-contractor HSE Compliance Flow Chart



CHAPTER FOUR

COMPANY RULES

M.J. DIXON CONSTRUCTION LTD. SAFETY RULES

Document Name: MJD Safety Rules	Document Number: PS010
Prepared by: Mauricio Carmona	Date of Issue: August 2021
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: January 2025
Frequency of Review: 1 year	Revision Number: 1

Policy Statement

Rules and regulations, as well as instruction and training, are an integral part of M.J. Dixon Construction Limited's (MJDs) health and safety program. When used effectively, they will contribute to the overall success of our program.

MJD's Senior Management Team is committed to doing everything possible to prevent injuries, to promote prevention and to maintain a healthy environment. To this end, all MJD Supervisors are responsible for ensuring employees are trained and to ensure Company Safety Rules are understood and always followed.

All personnel are required to support MJDs OHSMS and make health and safety a part of their daily routine. This includes following safety rules, safe work procedures and relevant regulations. All employees, including sub-contractors and their employees working on sites will be held jointly and personally accountable for their actions and any infractions of this policy.

MJD will continue to strive for continuous improvement of our Safety Rules by reviewing this policy annually.

Company Safety Rules

Below highlights the MJD's safety rules:

1. Required Personal Protective Equipment (PPE) must be worn and used as determined by MJD and Occupational Health and Safety Act (OHSA) requirements.
2. Report all unsafe acts and conditions, incidents such as near misses, property damage and accidents must be reported to your Supervisors and MJD representative immediately.
3. Carry out work and task at hand as per the Safe Work Practices and Procedures.
4. Proper housekeeping must always take place throughout the workplace to eliminate potential hazards and provide unobstructed access/egress in all workplaces.
5. Make sure you only use equipment and tools you are trained on and authorized in its use.
6. Make sure you inspect the tools and follow the manufacturer specifications. Never remove or tamper with the safety features.
7. Participating or encouraging horseplay, fighting, practical jokes or any other misconduct that might create, or constitute a hazard to others or you are prohibited at all MJD job sites and premises.
8. Make sure you seek assistance or use mechanical lifting devices when attempting to lift heavy material. Avoid awkward positions and always lift with the legs, not your back.
9. Zero tolerance for impaired work, including to and from work, applies. Zero tolerance for all alcohol and drugs applies to all MJD job sites and premises.
10. Smoking is only allowed in designated smoking areas.
11. Violations to the following represent a serious level of neglect and MJD project superintendent or his competent replacement has the right to exercise a "ZERO TOLERANCE" policy and have violator(s) dismissed from the project. No further warnings are required or will be given:
 - **Fall protection violations**
 - **Trenching/Excavation violations**
 - **Lockout and tagging violations**
 - **Confined Space work violations**
 - **Traffic control management violations**
12. For the safety of you and others, always remember to apply S.T.O.P. (Stop, Think, Observe, Proceed) to ensure each task is executed in a safe manner.
13. Company Rules Procedure SJP33 needs to be reviewed and followed by all employees and relevant workplace parties.



MJ Dixon Construction Ltd. – Vice President

January 2025

Date

Tracking Changes			
Reviewed by:	Review Date:	Changed Made:	Approved by:
Samira Westlund	July 2022	Added point 13.	Paul Chiang
Mauricio Carmona	July 2023	Annual Review. No changes made.	Paul Chiang
Mauricio Carmona	July 2024	Annual Review. No changes.	Paul Chiang
HSE Department	January 2025	Added Policy Statement (paragraph 1) before list of Company Safety Rules	Paul Chiang

COMPANY RULES PROCEDURE

Document Name: Company Rules Procedure	Document Number: SJP33
Prepared by: Mauricio Carmona	Date of Issue: August 2021
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: 1

1. Purpose

The following procedure outlines the roles and responsibilities for setting, implementing, and complying with Company Rules.

2. Scope

This procedure applies to all employees, sub-contractors, and visitors at M.J. Dixon Construction Limited (MJD).

3. Roles and Responsibilities

Senior Management:

- Assistance in setting, implementing, and enforcing **MJD Safety Rules (PS010)** in a consistent manner throughout the organization.
- Ensuring that both standard and work location-specific rules are available.
- Ensuring **MJD Safety Rules (PS010)** are written and either visibly posted or provided to each employee.
- Ensuring the rules are applied and enforced consistently through the organization.
- Accountable to the President/CEO for health and safety performance and for carrying out the President/CEO's vision for health and safety for the Company.
- Ensure employees under their control are current with required health and safety training, including health and safety orientation training for new employees.
- Implement and maintain a program to manage the health and safety requirements of sub-contractors.

Managers/Supervisors:

- Review, apply, and enforce **MJD Safety Rules (PS010)** consistently with all employees under their direction/supervision.
- Ensure company rules are visibly posted or provided to each employee.
- Ensure that company and work specific rules are clearly explained to workers in a way that they understand them.
- Ensure company rules are applied and enforced consistently through the organization.
- Continually promote health and safety awareness with instruction, information, training and supervision to ensure the safe performance of employees.
- Utilize the process of hazard identification, risk management and incident investigation when and where required.
- Perform health and safety inspections of the workplace to identify and control any and all hazards to employees.
- Ensure machinery and equipment are safe and that employees work in compliance with established safe work practices and procedures.
- Ensure employees receive adequate training for their specific work tasks.
- Keep written records of progressive disciplinary actions given to employees who have demonstrated misconduct.

Safety Expert or Delegate:

- Create, review and revise the **MJD Safety Rules Policy Statement (PS010)** and forward a draft to the President/CEO.
- Act as an advisor to management on safety and health policy issues.
- Coordinate health and safety inspections and follow-up to ensure the completion of necessary corrective actions.

Joint Health and Safety Committee (JHSC):

- Perform regular inspections of the workplace to identify hazards and recommend corrective actions to Senior Management.
- Review the **MJD Safety Rules (PS010)** and provide recommendations for improvement, when and where required.

Workers:

- Review and comply with **MJD Safety Rules (PS010)**.
- Complete required occupational health and safety training.
- Perform required duties in a manner conducive to a safe and healthy workplace, following and complying with all safety legislation, policies and procedures.
- Notify Managers/Supervisors of any health and safety concerns, incidents or injuries, so that they may be dealt with promptly.
- Use appropriate personal protective equipment as required.
- Report unsafe or potentially hazardous conditions, including acts of violence and harassment in the workplace, without fear of reprisal, to their Manager/Supervisor or Human Resources.

4. Procedure

- A. The Health and Safety Manager or Delegate will develop a draft/revision of **MJD Safety Rules Policy Statement (PS010)** and forward it to the JHSC for review. At a minimum the policy will confirm employer's and employee's commitment to the following areas of health and safety:
 - A workplace free from violence, harassment and discrimination
 - Mandatory use of personal protective equipment
 - Duty to report all hazards, incidents and injuries immediately
 - Fitness for work
 - Removal of defective tools or equipment from the workplace
 - Progressive discipline for misconduct
- B. Once the JHSC has reviewed the **MJD Safety Rules (PS010)**, the draft will be forwarded to the President/CEO who will review the draft provided and adjust as required. Final approved version will be signed and dated by the most Senior Management person on site and be sent to the Health and Safety Manager for distribution company wide.
- C. Department Managers/Supervisors will ensure that the **MJD Safety Rules Policy (PS010)** is visibly posted in a high traffic area within the workplace under their control and ensure distribution to all staff.
- D. Department Managers/Supervisors shall ensure **MJD Safety Rules (PS010)** and workplace specific rules are clearly communicated and explained to workers in a way that they understand them. A safety meeting will be held to explain and subsequently review the policy annually. The Policy will also be introduced to new staff and reviewed with recently promoted employees during orientation. The Department Manager/Supervisor shall verify knowledge and understanding of the **MJD Safety Rules Policy Statement (PS010)** through documented quizzes and tests. All records of any training must be kept in the employee's personnel file.

- E. A documented record of the annual review of the **MJD Safety Rules (PS010)** will be retained and changes made for improved effectiveness.

5. Progressive Discipline Procedure

5.1 Purpose

To standardize a protocol for managing, motivating, and correcting substandard performance or behavior of employee performances. Progressive Discipline will be used as a deterrent to prevent workers from working in an unsafe manner and will ensure compliance with all health and safety regulatory and program requirements.

5.2 Scope

This procedure applies to all employees and subcontractors at MJD. All employees are required to comply with all legal requirements concerning the health and safety of workers in the workplace, as well as the safe work procedures and any other requirements of the company's health and safety program. The company will not condone any breach of legal requirements or the health and safety program.

5.3 Policy

Workers, subcontractors, or others who willfully act in violation of the Company Health and Safety Program and/or the Ontario Occupational Health and Safety Act (OHSA) and Regulations will be subject to any of the following disciplinary actions as is appropriate:

1. Verbal warning
2. Written warning
3. Suspension/termination

The following are the specific procedures to be followed based on the type of violator:

	Violation Number		
	1 st	2 nd	3 rd
MJ Dixon Employee	Recorded verbal warning	Written warning	Suspension, retraining or termination
Subcontractor and Trade Contractor Employee	Recorded verbal warning	Written warning	Dismissal from the project
Architects/ Owners and Representatives	Recorded verbal warning	Written warning	Dismissal from the project

5.4 Documenting Disciplinary Procedures

All disciplinary actions must be documented (including verbal warnings). The warnings will be distributed to the following parties (when applicable):

- Supervisor in charge of the subcontract work
- Project superintendent or his competent replacement
- Trade contractor's head office

MJDs project manager in the event that a subcontractor or trade contractor refuses or neglects to rectify a hazardous condition, practice or any violation, MJD shall exercise the right to take immediate steps to correct the unsafe condition at the expense of the responsible parties. MJD may also remove from the work site any individual who continues to cause the unsafe condition to remain or performs in a manner inconsistent with the guidelines of the OHSA, its Regulations or our **Safety Rules Policy (PS010)**.

6. Revisions

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	July 2022	<ul style="list-style-type: none"> Created Company Rules Procedure – combined with existing MJDs Disciplinary Procedure <i>*Changes made to reflect COR 2020 requirements</i> 	Paul Chiang
Mauricio Carmona	July 2023	<ul style="list-style-type: none"> Annual review. No changes made. 	Paul Chiang
Mauricio Carmona	July 2024	<ul style="list-style-type: none"> Annual review. No changes. 	Paul Chiang
HSE Department	July 2025	<ul style="list-style-type: none"> Annual review. No changes. 	Paul Chiang

CHAPTER FIVE

PERSONAL PROTECTIVE EQUIPMENT

PERSONAL PROTECTIVE EQUIPMENT POLICY STATEMENT

Document Name: Personal Protective Equipment Policy Statement	Document Number: PS005
Prepared by: Mauricio Carmona	Date of Issue: August 2021
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: 1

The use of personal protective equipment (PPE) is necessary to help prevent serious injury or illness by eliminating or minimizing exposure to hazardous physical/chemical material. Personal protective equipment must be always worn where required. The following will also be practiced by all M.J. Dixon Construction Limited (MJD) employees when the company undertakes any job or contract:

- All employees and guests on job sites must wear CSA approved hard hats, safety boots, high visibility and any other specialty PPE required on the job site. Long trousers, long sleeves and garments must also be worn when required.
- Eye protection must be worn when the potential for eye injuries exists. This will provide protection when there is a danger from chipping, drilling, grinding, cutting, flying particles of dust, acid, toxic fluids or chemicals, and overhead work and in any other situations where there is a risk of an eye injury. Workers should keep in mind that depending on the hazard, a combination of face and eye protection may be necessary.
- All PPE used by the company will be within the requirements of the Occupational Health and Safety Act and Regulations.
- All PPE will be selected, used, and maintained in accordance with the manufacturer's instructions, specifications, and requirements.
- All PPE will be inspected prior to each use. Any defective equipment must be removed from service.
- All PPE that is damaged, or in need of service will be removed from service immediately.
- PPE shall not be used, modified, or changed contrary to manufacturer's instructions.
- Any violation of the personal protective equipment requirements will result in disciplinary action.
- The PPE Procedure must be reviewed by all employees and relevant workplace parties.



MJ Dixon Construction Ltd. – Vice President

July 2025

Date

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	July 2022	<ul style="list-style-type: none"> • Addition of last bullet point (i.e., reference to PPE Procedure). 	Paul Chiang
Mauricio Carmona	July 2023	<ul style="list-style-type: none"> • Annual review. No changes made. 	Paul Chiang
Mauricio Carmona	July 2024	<ul style="list-style-type: none"> • Annual review. No changes. 	Paul Chiang
HSE Department	July 2025	<ul style="list-style-type: none"> • Annual review. No changes. 	Paul Chiang

PERSONAL PROTECTIVE EQUIPMENT PROCEDURE

Document Name: Personal Protective Equipment Procedure	Document Number: SJP34
Prepared by: Mauricio Carmona	Date of Issue: August 2021
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: 3

1. Purpose

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

2. Scope

This procedure applies to employees, subcontractors, and any employees under them working on behalf of M.J. Dixon Construction Limited (MJD). The required PPE for each job task has been determined by the Job Hazard Analysis. The legislative requirement, manufacturer's guidelines and SDS pertaining to the task were reviewed during the assessment. A list of PPE required for each task/activity performed by MJD employees is identified and documented in the PPE Matrix found in the Job Hazard Analysis manual.

As part of the PPE program, MJD will also ensure:

- PPE is appropriate, comfortable, proper fitting and meets current Canadian Standards Association (CSA) Standards
- PPE is cleaned, maintained, and stored in accordance with manufacturer guidelines
- Workers are trained in use and care of PPE
- Supervisors are regularly monitoring and enforcing PPE requirements

3. Definitions

Basic PPE – The PPE that should always be worn by all personnel on a job site. This may include high visibility garments, safety glasses, hard hats, and safety footwear.

Specialized PPE - The PPE which is used only for specific jobs or for protection from specific hazards. This may include respiratory equipment, fall arrest equipment and hearing protection.

4. Roles and Responsibilities

Senior Management/Employer:

- Introduce, to the extent possible, engineering and/or administrative hazard control measures to minimize the need for PPE and/or protective clothing.
- Ensure activities requiring PPE are documented.
- Ensure specific criteria are used to select appropriate PPE for all activities.
- Ensure written rules and/or guidelines are created for the proper fitting, care and use of PPE and ensure workers are made aware of them.
- Ensure appropriate required and specialized PPE is provided and/or made available to workers for specific activities, or as required by the hazards of the job or workplace.

- Ensure management, supervisors, workers and sub-contractors and suppliers of service use required PPE when on site.
- Ensure specific forms for inspecting PPE.
- Ensure that PPE is replaced or replenished as needed.

Supervisor:

- Ensure that appropriate PPE is provided and made available to workers for specific activities.
- Ensure that mandatory and additional PPE is worn, used, and maintained by all workers.
- Ensure that each worker is properly trained in and knowledgeable of the hazards associated with his/her work, the type of PPE required and its proper maintenance, care, and use.
- Ensure proper inspection and maintenance of PPE as per manufacturers and legislative requirements.
- Ensure specific forms are utilized for inspecting PPE (*see Section 10: Internal and External References*).
- Coordinate purchases of PPE when required.
- Immediately stop and correct any non-compliant PPE activities.

Workers:

- Visually inspect all PPE prior to wearing or using.
- Wear, use, and always maintain PPE when and where required for their protection.
- Immediately stop and correct any non-compliant PPE activities.
- Immediately report any lost, damaged, or defective PPE to their supervisor.
- Participate in PPE training when applicable.
- DO NOT make modifications of any kind in a manner that affect the integrity of the PPE.

Contractors/Subcontractors:

- Use PPE as required by MJD.
- Provide the necessary PPE to their employees to ensure the duties can be performed safely at MJD sites.

Visitors:

- Visitors are required to be escorted by an MJD Site Supervisor (host)
- The host is required to ensure their guest(s) are equipped with the mandatory PPE, or any specialized PPE that may be required.

5. Procedure**5.1 Mandatory/Standard PPE**

The standard PPE described in this document is to be used or worn by personnel at MJD sites as a minimum requirement.

5.2 Specialized/Task Specific PPE

The specialized PPE described in this document is to be used or worn in addition to the standard PPE by personnel at MJD for specific jobs or for protection from specific hazards. The Subcontractor workers and their subcontractors are responsible for providing their employees with specialized PPE. This PPE policy is only for their review and reference.

5.3 Selection of PPE

- A review of SDS's, hazard assessments, best practices from similar industries and legislation will determine the specific criteria used to select the appropriate PPE for the job task.
- Workers will be made aware of requirements for PPE for specific tasks through orientation training, site training, departmental training, hazard assessments, procedures, or work instruction training.

5.4 Mandatory/Standard PPE

- All Standard PPE must be maintained in good condition, used, or worn in accordance with manufacturer instructions, and meet specific legislative requirements and CSA standards.
- All PPE must be worn appropriate for the circumstance.
- All workers are required to wear the following minimum PPE listed below. Any worker who is found not wearing the required PPE will result in disciplinary action.
- Other types of PPE will be used or worn as prescribed when required or when there is a risk of injury or illness due to specific work or job tasks being performed, or where indicated by signage or manufacturer's instructions.

5.5 Protective Headwear

Protective headwear (hard hat) must comply with CSA Z94.1-15. Type 2 Class G hard hat provides protection against impact hazards to the sides and crown of the head as well as against penetration hazards. Where there is exposure to high voltage hazards, Class E hard hats must be worn. The following guidelines should be followed when working with protective headwear:

- Hard hats must be worn in the forward-facing position, regardless if the "reverse orientation" symbol is present.
- Hard hats must be replaced after being subjected to impact.
- Hard hats should be replaced if deep cuts or scratches are present
- Hard hats should not be painted, as paint can weaken the plastic
- Never remove the Styrofoam liner (if applicable), as this will reduce the side impact protection.
- Damaged inner liners/shells must be reported and promptly replaced
- Use chinstraps when high winds are encountered, or movement will cause the hard hat to fall off the head
- Stickers on hard hats do not weaken the plastic, however, some marking pens might.
- When performing cutting, burning operations, areas of high heat, choose a hard hat made from fiberglass or other heat resistant materials.

5.6 Protective Eyewear

Eye protection (safety glasses/goggles) must comply with CSA 294.3-15. Safety glasses with permanently attached side shields are considered the basic standard for eye protection at MJD sites. Torch persons or welders are to wear safety glasses under face shields. Welders safety glasses should also have a shade number marked on them and must comply with CSA W117.2-12. Coverall glasses or goggles shall be required for prescription glasses that do not meet the standard.

The following guidelines should be followed when working with protective eyewear:

- Match the type of protection to the specific hazard. For example, glasses/goggles that protect your eyes from dust and other physical hazards may not protect your eyes from radiation or a chemical splash.
- All safety glasses/goggles should be CSA approved, and the CSA logo available on the frames.

- To protect you the way they are designed to, your safety glasses should fit securely and comfortably on the nasal bone.
- Always keep your safety glasses on as you may still be exposed to flying chips, dust, or other hazards.
- Contact lenses must not be worn in any area or for any job involving chemical eye irritants.

Shade numbers for oxygen cutting (from CSA W117.2)

Process	Plate Thickness (mm)	Minimum Shade #	Suggested Shade #
Light	<25	3	4
Medium	25-150	4	5
Heavy	>150	5	6

5.7 High-Visibility Clothing

Approved high visibility clothing (hi-vis clothing) must comply with CSA Z96-15 Class 2. Employees will be provided with a fluorescent green 5-point tear-away class 2 Hi-Vis vest during orientation. Employees may also wear breathable Hi-Vis class 2 t-shirts when temperatures are high.

5.8 Protective Footwear

Protective footwear must comply with CSA Z195.1-16 and must be equipped with built-in or fixed metatarsal protection. Safety boots must meet a minimum height of 6 inches.

5.9 Specialized/Task Specific PPE

Specialized PPE will be used or worn when indicated by hazard assessments, or when there is a risk of injury or illness due to specific work or job task being performed. Specialized PPE will be provided and made available to workers for specific activities. Proper training will be provided to workers who are required to use specialized PPE.

5.10 Protective Hand Wear

Approved hand wear are gloves that are ANSI Cut Level 4 and must be worn by MJD employees when working under conditions where there is a potential for hand injury. This includes any material handling, picking items to inspect from a load, cutting steel straps, etc. Gloves that are loose, or dangling should not be worn near any rotating shaft, spindle, gear, belt, or other source of entanglement. Chemical resistant gloves that provide an effective barrier against the specific chemical used must be worn whenever hands are potentially exposed to chemicals. An appropriate chemical resistant glove must demonstrate no significant degradation, a high breakthrough time, and a low permeation rate upon contact with the chemicals used. Chemical permeation through an inappropriate glove can result in significant worker exposure and serious health effects, particularly when using highly toxic chemicals that are readily absorbed into the bloodstream via the skin. Gloves will be replaced on a regular and frequent basis upon need. They should be replaced immediately upon signs of degradation, and particularly after contact with toxic chemicals. Once a chemical has been absorbed into the glove material, the chemical can continue to diffuse through the material even after the surface has been washed.

5.11 Hearing Protection

Hearing protection devices (HPD) must comply with CSA Standard 294.2-14. The standard identifies classes of hearing protectors as A, B, and C. Class A protectors offer the highest ability to attenuate, followed by B and C. Workers will be instructed in the proper fitting of HPDs as recommended by the

manufacturer. Training should include a demonstration. Workers should then practice using the HPDs under close supervision. Checks are needed to ensure the best possible protection.

Workers should understand the following:

- that the risk of hearing loss increases if HPDs are not worn in noisy environments (eight-hour exposure of 85 dBA).
- that wearing HPDs is required in all situations where noise exposure may damage hearing.
- that to be effective an HPD must not be removed even for short periods.
- that various HPDs are available to accommodate differences in ear canal size, jaw size, head size and shape, comfort level, compatibility with other forms of PPE, etc.
- that proper fit is essential to achieve maximum protection.

Using the table below we can identify proper hearing protectors based on noise.

Recommended Class of Hearing Protector	
MAXIMUM NOISE LEVEL (dBA)	RECOMMENDED CLASS OF HEARING PROTECTOR
Less than 85 dB	No protection required
Up to 89 dBA	Class C
Up to 95 dBA	Class B
Up to 105 dBA	Class A
Up to 110 dBA	Class A plug + Class A or Class B muff
More than 110 dBA	Class A plug + Class A or Class B muff and limited exposure

5.12 Face Protection

MJD requires that face protection such as a Face Shield, be worn in addition to safety glasses whenever there is a risk to a worker that could result in an injury or harmful exposure to a worker's eyes or face. These hazards are associated with:

- Flying objects, particles, and dust (e.g., grinding, cutting, hammering, sawing)
- Splashes (including droplets and sprays) from chemicals and other liquids
- Radiation (e.g., welding) and lasers
- Abrasive and molten material

Face protection must meet CSA Standard Z94.3 *Eye and Face Protectors* (Face Shields, Class 6A through 6D shall be selected based on task).

Face shields shall be properly fitted and adjusted to the worker. Face shields should extend below the chin and above the eyes and should wrap around the sides of the face. There should be no gaps or exposed areas.

Workers are to conduct regular visual inspections of the face shield for any signs of damage, such as:

- Cracks
- Scratches
- Worn-out components

Replace the shield immediately if any defects are detected to maintain its integrity.

Face shields should be cleaned after each use. The best way to do this is to use mild soap and water or a recommended cleaning agent (see manufacturer instructions). Rinse it thoroughly and allow it to air dry before storage.

5.13 Respiratory Protection

Approved respiratory protection equipment must be worn by MJD employees when working under conditions where ventilation is not practical or possible in order to reduce hazards by breathing in airborne hazardous agents such as dust, fumes, gases and vapours. Supervisors are to ensure there is adequate ventilation in work areas to reduce hazards from dust, fumes, gases or vapours. Respiratory protection consists of, but not limited to, single use dust masks, half-face masks with replaceable filters. Respiratory protection must comply with CSA 294.4-18. To ensure proper use of half-face masks, each worker must apply both the positive Pressure Test and the Negative Pressure Test each time the respirator is put on. Workers required to wear a respirator must be clean-shaven (trimmed moustache is okay) to provide the proper seal.

Positive Pressure Test

- Put on a face piece and adjust to fit comfortably under the chin and over the bridge of the nose.
- Block the exhalation valve and attempt to breath out.
- The face piece should puff slightly away from the face but should not let air escape.

Negative Pressure Test

- Block the air inlets (usually the opening in the filter on the sides of the face piece).
- Try to breathe. The face piece should collapse slightly if there are no leaks.

Respiratory Equipment Instructions

1. Filters should be changed as follows:
 - A. Dust/mist/fume filters should be changed when there is noticeable resistance to normal breathing.
 - B. Chemical cartridge respirators should be changed when the gas or vapour can be tasted or smelled.
 - C. Any filter should be changed at the interval specified by the manufacturer or when damaged in any way.
2. Inhalation and exhalation valves should be checked before the respirator is used.
3. Damaged facepiece, straps, filters, valves, or other parts should be replaced with "original equipment" parts.
4. Facepieces should be washed with mild soapy water as often as necessary to keep them clean and wearable.
5. Respirators should be assigned to the exclusive use of individual workers.
6. Where a respirator must be assigned to more than one worker, it should be disinfected after each use. (Check with the manufacturer regarding acceptable sanitizers/disinfectants.)
7. Check all supply hoses, valves, and regulators on supplied-air respirators as specified by the manufacturer.
8. SCBA units and high-pressure cylinders of compressed breathing air should be used and maintained in accordance with current Canadian Standards Association Z180.1 Compressed Breathing Air and Systems, and Z94.4 Selection, Care and Use of Respirators.
9. Compressors and filtration systems used with supplied-air respirators must be maintained in accordance

with the manufacturers' recommendations.

10. Consult the manufacturer for information on respirator cartridge change-out.

5.14 Fall Protection Equipment

Mandatory Fall Protection

All supervisors and workers must make themselves familiar with Section 26 of the *Regulations for Construction Projects* which outlines the circumstances where fall protection is required.

Fall protection application applies where a worker is exposed to any of the following hazards:

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

Section 26.1 (1) and (2) of the *Construction Regulations* states that:

(1) A worker shall be adequately protected by a guardrail system that meets the requirements of subsections 26.3 (2) to (8) (2) Despite subsection (1) if it is not reasonably possible to install a guardrail system as that subsection requires, a worker shall be adequately protected by at least one of the following methods of fall protection:

- 1. A travel restraint system that meets the requirements of section 26.4*
- 2. A fall restricting system that meets the requirements of section 26.5*
- 3. A fall arrest system, other than a fall restricting system designed for use in wood pole climbing, that meets the requirements of section 26.6*
- 4. A safety net that meets the requirements of section 26.8*

Always remember that if you are not certain of what type of fall protection is required for a particular situation, ask your supervisor for direction.

5.15 Fall Arrest Protection – Definition

Consists of a lanyard or lifeline/lanyard set-up where the wearer is allowed some movement at an exposed edge to perform his/her work and if he should trip or lose his/her balance he could possibly fall over the edge. This fall protection system must be adjusted so as to limit the wearer's fall to within 1.5 metres from where he stands or sits and only full body safety harnesses should be allowed for his/her protection.

5.16 Equipment Standards and Set-Up

1. All safety belts, full body harnesses and lanyards must be CSA certified and carry a CSA label.
2. Safety harnesses and belts are to be snug-fitting and worn with all hardware and straps intact and properly fastened.
3. Lanyards will comply with CSA standards.
4. The D-rings on the safety belts should be centered on the person's back.
5. The lanyard or lifeline and lanyard combination must be secured to a rigid support capable of resisting the peak arrest forces of 1800 lbs minimum for fall arrest protection purposes and its length should be adjusted so that the wearer will be prevented from falling no greater than 1.5 meters from where he stands.
6. When the lifeline consists of wire rope, or the connecting lanyard consists of nylon webbing, a shock absorbing lanyard shall be used.

5.17 Lifelines and Set-Up

All lifelines shall:

1. Comply with CSA standards.
2. Be used only by one worker at a time.
3. Be free of any cuts, abrasions, other defects and protected against chafing.
4. Be long enough to reach the ground or be knotted at the end.
5. Be connected at right angles to the worker's position.
6. Be provided with a rope grab (cam lever) device for lanyard attachment.

WARNING! No worker shall be exposed to heights greater than three metres when near an unguarded edge to a floor, roof, platform, opening or on a ladder without first providing travel restraint, fall arrest or guardrail protection. Any person found doing so shall be subjected to disciplinary action. Fall protection is also required if a worker may fall into operating machinery, into water or other liquids, into or onto hazardous substances or objects regardless of the minimum three metre ruling.

6. PPE Maintenance and Inspection schedule:

Without proper maintenance and inspection, the effectiveness of PPE cannot be assured. All PPE must be inspected and maintained according to manufacturer instructions and legislative requirements, and prior to be used or worn.

Standard PPE:	Maintenance	Inspection Frequency
Head Protection	According to manufacturer instructions	Visual prior to using and according to manufacturer instructions
Foot Protection	According to manufacturer instructions	Visual prior to using and according to manufacturer instructions
Reflective Safety Vest	According to manufacturer instructions	Visual prior to using and according to manufacturer instructions
Eye and Face Protection (When Required)	According to manufacturer instructions	Visual prior to using and according to manufacturer instructions
Specialized PPE:	Maintenance	Inspection Frequency
Hearing Protection	According to manufacturer instructions	Visual prior to using and according to manufacturer instructions
Respiratory Protection	According to manufacturer instructions	Visual prior to using and according to manufacturer instructions
Fall Protection	According to manufacturer instructions	Visual prior to using and according to manufacturer instructions
Hand Protection	According to manufacturer instructions	Visual prior to using and according to manufacturer instructions

7. PPE Availability

When there is occupational exposure to a health and safety hazard at MJD, Senior Management shall ensure that appropriate and suitable PPE is provided and/or made readily available to workers for specific work activities.

The Safety Expert and Site Supervisors are responsible for ensuring that the PPE and equipment required for the project are present and/or available at point of use or where hazardous work requiring PPE is performed. They shall also ensure PPE is always functional and followed by all workplace parties.

8. Monitoring

Site Supervisors will ensure that mandatory basic PPE is worn by required employees (management, supervisors, workers, sub-contractors, and suppliers of service) to ensure compliance to the PPE program. Site Supervisors will visually check all workers to ensure that everyone is adequately wearing/using their PPE where required and according to manufacturer specification and job requirements.

PPE requirements are communicated during the Orientation process and monitored and inspected by MJD site management on a weekly basis by using the Weekly Supervisor Workplace Inspection Form.

In addition, the JHSC or HSR, during regular workplace inspections (monthly), will audit PPE use, maintenance, storage, and enforcement. Records will be made on the inspection form and corrected immediately.

Employees who fail to use required PPE will receive appropriate warnings and disciplinary action. Site Supervisors reserve the right to remove anyone from the work site who causes unsafe conditions or practices, or who performs in a manner that is inconsistent with the requirements of the OHSA and regulations.

9. Communication and Training

PPE is discussed as an integral part of MJDs Health & Safety Orientation program. Senior Management in coordination with the Safety Expert and Site Supervisors will develop written procedures on the proper selection, fit, use, care, limitations, and disposal of PPE. All affected employees will be trained in the procedure(s) and written guidelines.

PPE training will be arranged by the Safety Expert and Site Supervisors. Refresher training will be done annually. Training will be provided to all new, transferred, contract and part-time employees.

All training and communication will be documented and maintained. The document certifies that the employee has received and understood the required training on the specific PPE he/she will be using. Records of training and communication shall be kept in accordance with the **Document and Record Control Procedure**.

10. Internal and External References

External:

- Construction Projects Regulation 213/91, s.26
- CAN/CSA-Z259.1-05: Body Belts and Saddles for Work Positioning and Travel Restraint

Internal Forms:

- HSF001 - Pre-Job Hazard Analysis (PHA)
- HSF003 - Weekly Supervisor Workplace Inspection
- HSF010 - Full Body Harness Inspection (Pre-Use/Annually)

8. Revisions

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	July 2022	<ul style="list-style-type: none"> • Updated Section 1: Purpose • Updated Section 2: Scope • Updated Section 4: Roles and Responsibilities • Updated document numbering <i>*Changes made to reflect COR 2020 Requirements</i>	Paul Chiang
Mauricio Carmona	February 2023	<ul style="list-style-type: none"> • Updated Section 2: Scope • Added Section 7: PPE Availability • Added Section 8: Monitoring • Added Section 9: Communication and Training <i>*Changes made to reflect COR 2020 external audit review and findings.</i>	Paul Chiang
Mauricio Carmona	July 2024	<ul style="list-style-type: none"> • Updated Section: 5.12 Face Protection to include safety requirements around Face Shields 	Paul Chiang
HSE Department	July 2025	<ul style="list-style-type: none"> • Annual review. No change. 	Paul Chiang

CHAPTER SIX

PREVENTATIVE MAINTENANCE

PREVENTATIVE MAINTENANCE POLICY STATEMENT

Document Name: Preventative Maintenance Policy Statement	Document Number: SJP18
Prepared by: Mauricio Carmona	Date of Issue: August 2022
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: No Change

M.J. Dixon Construction Limited (MJD) considers preventative maintenance a key component to risk management and an effective workplace control; it can help you identify problems, deficiencies and non-conformities related to specific equipment and lead to the correction of the issue before it leads to an incident, injury, or breakdown of equipment.

MJDs preventative maintenance program will ensure the safe operation of facilities, equipment, vehicles, and tools to prevent injuries/illness, loss of equipment or facilities and prevent loss of productivity through:

- An inventory of items to be maintained,
- Documented inspection schedules for all MJD equipment,
- Standards and schedules to be met based on manufacturer guidelines, owner/instruction manuals, legislative requirements, codes, and industry best practices,
- The development and communication of written procedures for each piece of equipment, and
- Roles and responsibilities of applicable workplace parties as it relates to preventive maintenance.

MJD will maintain accurate records of their maintenance, including corrective action taken to return equipment to a safe standard. Any overdue and/or defective tools, equipment, facilities, or vehicles will be removed from service.

This policy will be reviewed at least annually, and records of review maintained.



MJ Dixon Construction Ltd. – Vice President

July 2025

Date

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	July 2023	<ul style="list-style-type: none"> Annual review. No changes made. 	Paul Chiang
Mauricio Carmona	July 2024	<ul style="list-style-type: none"> Annual review. No changes made. 	Paul Chiang
HSE Department	July 2025	<ul style="list-style-type: none"> Annual review. No changes made. 	Paul Chiang

PREVENTATIVE MAINTENANCE PROCEDURE

Document Name: Preventative Maintenance Procedure	Document Number: SJP35
Prepared by: Mauricio Carmona	Date of Issue: August 2021
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: 2

1. Purpose

In addition to ensuring that workers use tools and equipment properly, it is vital that tools and equipment be properly inspected, maintained, and kept in good repair. Our maintenance program will reduce the risk of injury, damage, and lost production.

2. Scope

This procedure applies to all M.J. Dixon Construction Limited (MJD) supervisors and employees who operate or maintain equipment and tools.

3. Definitions

Competent Person – an individual who has the training, experience, knowledge and understanding of the operation of the equipment. This individual must possess: a certificate of qualification, specific manufacturer's training, or years of experience in the industry.

4. Roles and Responsibilities

Senior Management:

- Identify roles and responsibilities of workplace parties as it relates to the preventative maintenance program.
- Ensure competent/qualified workers perform inspections and preventative maintenance as per the procedure (i.e., licensed mechanic)
- Create a list of all items (inventory) to be maintained (whether owned, leased or rented).
- Ensure the use of preventative maintenance schedules.
- Ensure preventative maintenance schedules are in accordance with manufacturer guidelines, industry standards and legislated requirements.
- Develop and provide standardized recording forms and/or software for scheduling and tracking preventative maintenance.
- Assess health and safety considerations prior to purchasing new equipment.
- Conduct a scheduled annual review of this program.

Managers/Supervisors/Maintenance Department:

- Ensure maintenance work performed under their authority or control conforms to the requirements of this program.
- Document and maintain inspection schedules for each piece of equipment that require scheduled servicing, adjusting, or replacing of their components.
- Maintain preventative maintenance records/documentation, including corrective actions taken.
- Ensure that overdue and/or defective tools, equipment, facilities, and vehicles are removed from service.

- Ensure that relevant preventative maintenance by contractors/subcontractors is conducted and conforms to the requirements of this program.

Safety Expert or Designate:

- Act as a resource to all management and workers with regards to all elements of this program.
- Participate in an annual continuous improvement of the preventative maintenance program.

Workers:

- Report all equipment and preventative maintenance-related health and safety hazards and program violations to the Manager/Supervisor immediately.
- Participate in any health and safety training required by MJD.
- Follow all applicable MJD policies, procedures, and legislative requirements.

Joint Health and Safety Committee (JHSC):

- Review this program and any other relevant document or record in relation to this procedure; as required, for the purpose of identifying health and safety hazards and program gaps and recommending areas of improvement to Senior Management.

5. Procedure

5.1 INVENTORY LISTS

- Managers/Supervisors will be responsible for ensuring that equipment requiring preventative maintenance (whether owned, leased or rented) is tracked and identified on an inventory list located in at least one of the following: in their department and/or kept with the Maintenance Department.
- Items included on the list are those that require scheduled servicing, adjusting or replacing of components, which can include power tools, equipment, skid steers, lift trucks, vehicles, facilities, etc.
- Managers/Supervisors will be responsible for maintaining and updating their own equipment inventory if the equipment requiring preventative maintenance is not being serviced by the Maintenance Department.
- New pieces of equipment must be added to the inventory as they are acquired.
- The Maintenance Department will maintain an inventory of the equipment that they service. The inventory and preventive maintenance schedule may be combined.

5.2 SCHEDULES

Each department or service that conducts preventative maintenance will maintain a schedule and record of the preventative maintenance including the date. The schedule should indicate the frequency of inspection or servicing based on the manufacturer guidelines, owner/instruction manual, legislative requirements, codes, and best practices.

The standards for the preventative maintenance program are established by the following:

- The manufacturer's recommendations; O.Reg 145/00, s. 25(2)
- Industry's regulations and standards; and O.Reg 145/00, s. 26
- Legislated requirements. O. Reg. 213/91, s. 93(1)

5.3 INSPECTION

- As required, Managers/Supervisors will ensure that a ***Pre-Start Health and Safety Review*** as outlined in the Industrial Establishments Regulation 851 (Section 7) is conducted and documented.
- The health and safety hazards and related controls will be assessed and documented to ensure safety of workers during conducting preventative maintenance (i.e., electrical lock-out/tag-out, respirator protection when cleaning ducts, fall protection, confined space etc.).
- An effective tracking system will be developed to track all pieces of equipment that require preventative maintenance and include inventory, schedule, work required, flagging system to warn of upcoming preventive maintenance requirements, and work performed etc.

5.4 STANDARD RECORDING SYSTEM

- Managers/Supervisors shall create a preventative maintenance recording form adapted/customized for each piece of equipment that falls under their direction. The recording system must include:
 - List of items to be inspected and/or serviced
 - Inspector's name, signature and qualifications
 - Date of inspection and/or servicing
 - Description of work performed
 - Deficiencies and other comments as required (i.e. recommendations with action plan)
- If a piece of equipment, tool, facilities or vehicle is found defective or overdue, employees are to properly following lock-out procedures including: demobilizing equipment, properly tagging-out the item, fill out the tag with the employee and supervisor name, and reason for isolating equipment. The employee is to then inform a Supervisor immediately. The Supervisor shall remove it from service and appropriate parties notified and recorded. Supervisor will contact equipment owner to remove equipment from the site. All tools, equipment or vehicles tagged unsafe shall either be repaired or replaced immediately.
- Forms and records, including corrective actions taken, will be kept and made available for inspections, investigations and audits.

6. Qualifications and Training

The qualifications of maintenance personnel are key to the success of MJDs maintenance program. All individuals who perform inspections in-house will have the appropriate skills, accreditation and/or certification. This applies to both company employees and contracted maintenance services.

Verifying competency of MJD personnel may include one, or a combination of one or more of the following:

- Possession of certification or license
- Successful completion of adequate training appropriate to the type of equipment, tool, or vehicle
- Proven work experience
- Ability to read manufacturer/technical manuals and drawings

MJD vehicle maintenance will be conducted at the local dealership by a qualified mechanic in a qualified facility. All other equipment rented or leased by MJD will be inspected and maintained by qualified 3rd party providers.

Training on this procedure will be documented, and training records will be kept by the Health and Safety Department.

7. Program Evaluation

The preventive maintenance procedure and program elements will be reviewed as required to determine if all tools, equipment, and vehicles operate reliably and safely and to incorporate improvements to the program.

APPENDIX A: MAINTENANCE SCHEDULES

MAINTENANCE SCHEDULES FOR VEHICLES, FALL PROTECTION, PORTABLE EXTINGUISHERS

Scheduled Maintenance – GM Vehicles

Service	Maintenance I	Maintenance II
Change engine oil and filter. Reset oil life system.	✓	✓
Replace external transmission filter at the first maintenance service performed on the vehicle.		
Lubricate chassis components.	✓	✓
Visually check for any leaks or damage.	✓	✓
Inspect engine air cleaner filter or change indicator (if equipped). If necessary, replace filter.		✓
Rotate tires and check inflation pressures and wear.	✓	✓
Inspect brake system.	✓	✓
Check engine coolant and windshield washer fluid levels and add fluid as needed.	✓	✓
Perform any needed additional services. See “Additional Required Services”	✓	✓
Inspect Suspension and steering components.		✓
Inspect engine cooling system.		✓
Inspect wiper blades.		✓
Inspect restraint system components.		✓
Lubricate body components.		✓
Check transmission fluid level and add fluid as needed.		✓

Additional Required Services

Mileage	40,000km	80,000km	120,000km	160,000km	200,000km	240,000km
Inspect fuel system for damage or leaks	✓	✓	✓	✓	✓	✓
Inspect exhaust system for loose or damages components	✓	✓	✓	✓	✓	✓
Vehicles without a filter restriction indicator: Replace engine air cleaner filter		✓		✓		✓
Change automatic transmission fluid		✓		✓		✓

and filter (severe service)						
Change automatic transmission fluid and filter (normal service)						
Change transfer case fluid		✓		✓		✓
Inspect evaporative control system.		✓		✓		✓
Replace spark plugs and inspect spark plug wires.				✓		
Engine cooling system service (or every 5 years, whichever occurs first).						✓
Inspect engine accessory drive belt.						✓

Scheduled Maintenance – Chrysler Vehicles

At every Oil Change Interval As indicated By Oil Change Indicator System:
<ul style="list-style-type: none"> Change oil and filter.
<ul style="list-style-type: none"> Rotate the tires. Rotate at the first sign of irregular wear, even if it occurs before the oil indicator system turns on.
<ul style="list-style-type: none"> Inspect battery and clean and tighten terminals as required
Inspect automatic transmission fluid if equipped with dipstick.
Inspect brake pads, shoes, rotors, drums, hoses and park brake.
Inspect engine cooling system protection and hoses.
Inspect exhaust system.
Perform any needed additional services. See “Additional Required Services”
Inspect engine air cleaner if using in dusty or off-road conditions.

Additional Required Services

Mileage	32,000km	48,000km	64,000km	80,000km	96,000km	112,000km
Or Years:	2	3	4	5	6	7
Inspect the CV/Universal joints.		✓			✓	
Inspect front suspension, tie rod ends, and replace if necessary.	✓		✓		✓	
Inspect the front and rear axle surfaces. If gear oil leakage is		✓			✓	

suspected, check the fluid level.						
Inspect the brake linings, replace as necessary.	✓		✓		✓	
Adjust parking brake as necessary.	✓		✓		✓	
Inspect transfer case fluid.		✓				
Replace engine air filter.		✓			✓	
Flush and replace the engine coolant at 10 years or (240,000km) whichever comes first.						

Scheduled Maintenance – Jaguar Vehicles

Mileage	24,000km	48,000km	72,000km	96,000km	120,000km	144,000km
Or Years:	1	2	3	4	5	6
1. Vehicle Interior						
Check operation of parking brake	✓	✓	✓	✓	✓	✓
Check operation of all lights, warning indicators, and horn	✓	✓	✓	✓	✓	✓
Check operation of windshield wiper/washer systems	✓	✓	✓	✓	✓	✓
Replace climate-controlled seat cushion motor filters (if fitted)		✓		✓		✓
2. Vehicle Exterior						
Inspect windshield wiper blades and rubber inserts	✓	✓	✓	✓	✓	✓
Check tire pressure, condition and tread depth	✓	✓	✓	✓	✓	✓
3. Luggage Compartment						
Check spare tire pressure, condition and tread depth	✓	✓	✓	✓	✓	✓
Check and top-up battery electrolyte level		✓		✓		✓
4. Engine Compartment						
Check and top-up brake, PAS and windshield washer fluid	✓	✓	✓	✓	✓	✓
Check coolant level and freeze protection level	✓	✓	✓	✓	✓	✓
Inspect accessory drive and (if equipped) supercharger belt	✓	✓	✓	✓	✓	✓

Replace engine oil and oil filter	✓	✓	✓	✓	✓	✓
Replace pollen filter		✓		✓		✓
Replace air cleaner elements – supercharged				✓		
Replace air cleaner elements – naturally aspirated					✓	
Replace brake fluid	Every three years regardless of mileage					
Replace spark plugs	Every 168,000 km					
Replace supercharger drive belt (if equipped)	Every 168,000 km					
Replace engine coolant	Ten years or 240,000km					
Replace accessory drive belt	@ 240,000km					
2. Under Vehicle						
Inspect for brake pad wear, caliper leaks and disc condition	✓	✓	✓	✓	✓	✓
Check tire pressures, condition and tread depth	✓	✓	✓	✓	✓	✓
Inspect for under vehicle fluid leaks	✓	✓	✓	✓	✓	✓
Inspect break lines and hoses, fuel lines, PAS hoses and unions for correct routing and damage	✓	✓	✓	✓	✓	✓
Replace fuel filter	Ten years or 240,000km					
3. Remedial Work / Service Campaign Needed						
If fault lamps illuminated use IDS for further diagnosis / repair	✓	✓	✓	✓	✓	✓
Check VIN in DDW for any open Service Campaigns	✓	✓	✓	✓	✓	✓

Scheduled Maintenance – Excavator ZX35U5

A. Greasing

Parts			Quantity	Interval (hours)					
				8	50	100	250	500	1000 2000
1	Front Joint Pins	Bucket and Link Pins	5						
		Swing Post and Others	10						Or every year
2	Blade Pins		4						Or every year
3	Swing Bearing		2						
4	Swing Internal Gear		1						

5	Control Lever Universal Joint	2						Or every year
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: In case excavations are performed in water, grease the pin after operation is complete.

: Grease al pins every 100 hours during first time operation up to 500 hours.

B. Engine

Parts			Quantity	Interval (hours)						
				8	50	100	250	500	1000	2000
1	Engine Oil	Check oil Level	1							
2	Engine Oil	Change	6.7 L							
3	Engine oil Filter	Replace	1							

: As the oil life is shortened more than normal under high temperature operating condition, shorten the maintenance interval.

C. Transmission

C. Transmission				Quantity	Interval (hours)						
Parts					8	50	100	250	500	1000	2000
1	Travel Gear Reduction	Check Oil Level		2							
		Change		0.6Lx2							

D. Hydraulic System

Parts			Quantity	Interval (hours)								
				8	50	100	250	500	1000	1500	2000	3000
1	Check Hydraulic Oil Level		1									
2	Drain Hydraulic Oil Tank Sump		1									
3	Change Hydraulic Oil		43L									
4	Clean Suction Filter		1	Each time when hydraulic oil is changed								
5	Replace full-flow filter Element	Filter-Paper Element	1									
		High Performance Element (Optional)	1									
6	Replace Pilot Oil Filter Element		1									

7	Check Hoses and Lines	For leaks, loose	-								
		For cracks, bend, etc.	-								

: Changing interval differs according to the brand of hydraulic oil used, kind of filter element or average attachment operating availability.

: Maintenance required only during first time.

E. Fuel Engine

Parts			Quantity	Interval (hours)						
				8	50	100	250	500	1000	2000
1	Check Fuel level		1							
2	Drain Fuel Tank Sump		1	As Required						
3	Drain Water Separator		1							
4	Replace Fuel Main Filter Element		1							
5	Check Fuel Hoses	For leaks, cracks	-							
		For cracks, bend, etc.	-							

F. Air Cleaner

Parts				Quantity	Interval (hours)						
					8	50	100	250	500	1000	2000
1	Air Cleaner Outer Element	Clean	1	(or when indicator is lit)							
		Replace	1	After cleaning 6 times or 1 year							
2	Air Cleaner Inner Element (Optional)	Replace	1	When outer element is replaced							

: Shorten the interval in a dusty work site.

G. Cooling System

Parts		Quantity	Interval (hours)						
			8	50	100	250	500	1000	2000
1	Check Coolant Level	1							
2	Check and Adjust Fan Belt Tension	1							

3	Change Coolant		5.0L	Twice a Year*				
4	Clean Radiator and Oil Cooler	Outside	1					
		Inside	1	When coolant is changed				
5	Clean Air Conditioner Condenser		-					
6	Clean Air Conditioner Condenser Front Screen		-					
7	Clean Fuel Cooler		-					

: Shorten the maintenance interval when the machine is operated in dusty areas.

: Maintenance required only during first time check.

*: When genuine Hitachi Long-Life Coolant (LLC) is used, change every two years or 2000 operating hours, whichever comes first.

IMPORTANT:

- Use soft water as a coolant. Do not use strong acid or alkaline water. Use the coolant with genuine Hitachi Long-Life Coolant (LLC) mixed by 30 to 50%. If a coolant mixed with less than 30% of genuine Hitachi Long-Life Coolant (LLC) is used, service life of the cooling parts may be shortened due to damage by freezing or corrosion of coolant system parts.
- If mineral-rich water is used for coolant, water stain or scale may build up inside the engine or radiator, causing overheat due to deterioration of coolant performance.

H. Electrical System

Parts			Quantity	Interval (hours)							
				8	50	100	250	500	1000	2000	
1	Battery	Check Electrolyte Level	1	Every month							
		Check Electrolyte specific gravity	1	Every month							
2	Replacing Fuses	Replace	-	As Required							

I. Miscellaneous

Parts			Quantity	Interval (hours)									
				8	50	100	250	500	1000	1500	2000	3000	
1	Check and Replace Bucket Teeth		-										

2	Change Bucket			-	As required							
3	Adjust Track Sag (Rubber Crawler) and Check for Damage			2								
4	Replace Rubber Crawler			2	As Required							
5	Check Track Sag (Steel Crawler) (optional)			2								
6	Check and Replace Seat Belt			1		Every 3 Years						
7	Check Air Conditioner (Cab Equipped Machine)			-								
8	Clean an Replace Heater/Air Conditioner Filter	Circulating Air Filter	Clean	1								
			Replace	1	After cleaning 6 times or so							
		Fresh Air Filter	Clean	1								
			Replace	1	After cleaning 6 times or so							
9	Clean Cab Floor			-	As Required							
10	Check, Clean and Function Check of Injection Nozzle			-								
11	Inspect and Adjust Injection Timing			-								
12	Measure Engine Compression Pressure			-								
13	Check Starter and Alternator			-								
14	Check Crankcase Breather			-								
15	Check Radiator Cap			-								
16	Tightening and Retightening Torque of Nuts and Bolts			-								

: Maintenance required only during first time check.

Scheduled Maintenance – Thomas Skid Steer T153

ITEM	SERVICE REQUIRED	5	1	3	8	1
		0	5	0	0	0
		H	0	0	0	0
		R	H	H	H	0
		S	R	R	R	H
			S	S	S	R
						S

Engine Oil	Check level and add if necessary. Use 10W30 API Classification CF oil.					
Hydraulic Oil	Check level and add if necessary. Use 10W30 API Classification SJ or 20W50 API Classification SJ oil.					
Radiator & Oil Cooler	Check level and add if necessary. Fill with 50% mixture of ethylene glycol and water. Check cooling fins for dirt. If necessary, blow out with compressed air					
Air Cleaner	Empty dust cap. Check condition indicator and service or replace element as required.					
Tires and Wheel Nuts	Check for low pressure or tire damage, refer to Section 5.1 for more information. Check wheel nut torque 100-110 ft. lbs. (136-149 Nm)					
Safety Equipment	Check all safety equipment for proper operation and condition. Seat belt lift arm supports, quick-tach locks, parking brake, safety treads, front shield and cab side screens. If necessary, lubricate foot pedal and steering control linkages, springs and shafts with a silicone-based lubricant. If necessary, repair or replace.					
Decals	Check for damaged safety or instruction decals. If necessary, replace.					
Lubrication	Grease all hinge pin fittings and pivot bearings until excess shows.					
Hydraulic Oil Filter	Replace hydraulic oil filter element. Initial change only					
Safety System Linkages and Springs	Check and if necessary, adjust. Lubricate lock springs, shaft and linkage with a silicone-based lubricant.					
50 Hour Service	Perform complete 50-hour service					
Engine Oil	Replace engine oil. Use API Classification CF oil. (See Section 4.8-3). Initial change only.					
Engine Oil Filter	Replace engine oil filter. Initial change only.					
Final Drive	Check chain and sprocket condition. Check every 150 hours					
Hydraulic Oil Filter(s)	Replace hydraulic oil filter element					
Preventative Maintenance Service Check	It is recommended as a preventative maintenance procedure that the 50-hour service be repeated every 150 hours.					
Engine Oil	Replace engine oil. Use API Classification CF oil. Replace every 150 hours.					
Engine Oil Filter	Replace engine oil filter. See 4.8-3. Replace every 300 hours.					
Engine Fuel Filter	Replace engine fuel filter.					
Engine Valve Clearance	Adjust					
Final Drive	Change final drive lubricating oil. Use 10W30 API Classification SJ oil.					
Hydraulic reservoir	Remove and replace the 100-micron suction element in the oil reservoir. Change hydraulic oil. Replace with 10W30 API Classification SJ oil or 20W50 API Classification SJ					

Engine Cooling System	Drain, flush and refill. Use 50% mixture of ethylene glycol and water.						
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Scheduled Maintenance (Yearly) - Fall Protection Equipment, Safety Harness –

*The travel restraint system shall be inspected by a competent worker before each use. O.Reg 145/00, s. 14.

WEBBING
<ul style="list-style-type: none"> • UV Damage (discoloration), mildew, rotting
<ul style="list-style-type: none"> • Cuts/ frays / abrasion
<ul style="list-style-type: none"> • Contact with chemicals / oil / paint / marker
<ul style="list-style-type: none"> • Soiling
<ul style="list-style-type: none"> • Evidence of heat damage (friction, welding splatter, sparks, burn holes)
D-RINGS (includes hardware, keepers and back pads)
<ul style="list-style-type: none"> • Damage
<ul style="list-style-type: none"> • Distortion, grooved, bent
<ul style="list-style-type: none"> • Sharp edges, cracks
<ul style="list-style-type: none"> • Burrs
<ul style="list-style-type: none"> • Corrosion
<ul style="list-style-type: none"> • Evidence of heat damage (friction, welding splatter, sparks, burn holes)
STITCHING
<ul style="list-style-type: none"> • Fully stitched
<ul style="list-style-type: none"> • Backstitch present
<ul style="list-style-type: none"> • Pulled or cut stitches
BUCKLES & ADJUSTERS
<ul style="list-style-type: none"> • Damage
<ul style="list-style-type: none"> • Distortion
<ul style="list-style-type: none"> • Sharpe edges, cracks
<ul style="list-style-type: none"> • Sticky springs
<ul style="list-style-type: none"> • Bent tongues
<ul style="list-style-type: none"> • Corrosion
SNAP HOOKS

<ul style="list-style-type: none"> • Excessive wear
<ul style="list-style-type: none"> • Excessive dirt
<ul style="list-style-type: none"> • Sharpe edges, cracks
<ul style="list-style-type: none"> • 2 Action open
<ul style="list-style-type: none"> • Locking action
<ul style="list-style-type: none"> • Corrosion
LANYARDS & LIFELINES
<ul style="list-style-type: none"> • Appropriate OHSA / CSA markings or labels
<ul style="list-style-type: none"> • Cuts, burns, tears or frays
<ul style="list-style-type: none"> • Abrasion
<ul style="list-style-type: none"> • Knots
<ul style="list-style-type: none"> • Excessive soiling
<ul style="list-style-type: none"> • Contact with chemicals /solvents
<ul style="list-style-type: none"> • Contact with grease/ oil / paint / marker
<ul style="list-style-type: none"> • UV damage (discoloration), mildew, rotting
<ul style="list-style-type: none"> • Evidence of heat damage (friction, welding splatter, sparks, burn holes)
<ul style="list-style-type: none"> • Distortion of housing
<ul style="list-style-type: none"> • Spring tension allows for retraction and for retention
<ul style="list-style-type: none"> • Indicator for activation / deployed
<ul style="list-style-type: none"> • Broken wires
LABELS & MARKINGS
<ul style="list-style-type: none"> • Appropriate OHSA / CSA markings or labels
<ul style="list-style-type: none"> • Legible
<ul style="list-style-type: none"> • Securely held in place
<ul style="list-style-type: none"> • Manufacturer's in-service date

SCHEDULED MAINTENANCE – PORTABLE EXTINGUISHERS

CHECK – Means visual observation to ensure the device or system is in place and is not obviously damaged or obstructed.

TEST – Means operation of device or system to ensure that it will perform in accordance with its intended operation or function.

INSPECT – Means physical examination to determine that the device or system will apparently perform in accordance with its intended function.

A record of all tests and corrective measures as required by the Ontario Fire Code MUST be retained for a period of two years after they are made.

Frequency Intervals	Function	O.F.C. Reference	Reg
Annually	Maintenance and testing of portable extinguishers shall be in conformance with NFPA 10, “Portable Fire Extinguishers”. *	Div B – 6.2.7.1.	
Monthly	Portable extinguishers shall be inspected monthly. **	Div B – 6.2.7.2.	O. Reg 213/91, s. 55
Every 5 Years	Pressurized water and carbon dioxide fire extinguishers shall be hydrostatically tested . *	Div B – 6.2.7.1.	
Every 6 Years	Stored pressure extinguishers that require a 12-year hydrostatic test shall be emptied and subjected to the applicable maintenance procedures. *	Div B – 6.2.7.1	

* Portable extinguishers must be serviced by a qualified technician in accordance with NFPA 10.

** A record of this inspection shall be recorded on the tag located on the porta

9. Revisions

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	July 2022	<ul style="list-style-type: none"> Added Section 4: Roles and Responsibilities Updated 5.1 Inventory Lists; and 5.2 Schedules. Added Section 5.3 and 5.4; 6 & 7 Maintenance Schedule moved to Appendix A. <i>*Changes made to reflect COR 2020 requirements</i>	Paul Chiang
Mauricio Carmona	February 2023	<ul style="list-style-type: none"> Updated Section 5.4: Standard Recording System Updated Section 6: Qualifications and Training <i>*Changes made to reflect COR 2020 external audit review and findings.</i>	Paul Chiang
Mauricio Carmona	July 2024	<ul style="list-style-type: none"> Annual review. No changes made. 	Paul Chiang
HSE Dept.	July 2025	<ul style="list-style-type: none"> Annual review. No changes. 	Paul Chiang

CHAPTER SEVEN

TRAINING AND COMMUNICATION

TRAINING POLICY STATEMENT

Document Name: Training Policy Statement	Document Number: SJP19
Prepared by: Mauricio Carmona	Date of Issue: August 2022
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: 1

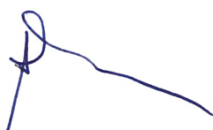
M.J. Dixon Construction Limited (MJD) considers training fundamental to ensure that workplace parties understand their roles and responsibilities to implement the Occupational Health and Safety Management System (OHSMS).

To that purpose, MJD will ensure that all employees have acquired the proper training and education upon hire and prior to performing any task. Training needs will be assessed according to company needs and legislative requirements and will only be provided by competent people.

Health and safety training can help ensure that employees who are assigned to do tasks are competent and are less likely to be injured in the process of performing the task. MJD will ensure that all health and safety training will be effective and appropriate for the workplace, including refresher training as required.

MJD has a procedure that further implements this policy.

This policy along with the coordinating procedure will be reviewed annually, and records of review maintained.



MJ Dixon Construction Ltd. - Vice President

July 2025

Date

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	February 2023	<ul style="list-style-type: none"> Removed any wording around "Communications" and changed into a stand-alone policy statement on "Training". 	Paul Chiang
Mauricio Carmona	July 2024	<ul style="list-style-type: none"> Annual review. No changes made. 	Paul Chiang
HSE Department	July 2025	<ul style="list-style-type: none"> Annual review. No changes made. 	Paul Chiang

TRAINING PROCEDURE

Document Name: Training Procedure	Document Number: SJP36
Prepared by: Mauricio Carmona	Date of Issue: August 2022
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: 1

1. Purpose

M.J. Dixon Construction Limited (MJD) believes that proper training aids in the development and maintenance of job-specific knowledge and skills needed to work safely and efficiently. The following procedure is to ensure that all MJD employees receive appropriate training in order to complete their duties in a healthy and safe manner.

All employees who receive training under this program will be based on an education and training needs assessment.

2. Scope

This procedure applies to all workplace parties.

3. Definitions

Competent Person - A person who is:

- Qualified because of the knowledge training and experience to organize the work and its performance;
- Is familiar with the Act and the regulations that apply to the work; and,
- Has knowledge of any potential or actual danger to health or safety in the workplace.

Training - Refers to education and skills programs approved by MJD and given in a training course format in classroom, onsite or offsite, or online by a competent person(s) (i.e., qualified trainers or supervisors, training providers or experts in a specific field).

4. Roles and Responsibilities

Senior Management:

- Provide the resources to develop, implement and maintain an effective health and safety training program.
- Assign roles and responsibilities for training coordination (i.e., administration and training management) to competent persons.
- Ensure that selected Supervisors and trainers are competent to perform the required in-house training.
- Ensure that a training needs assessment process is in place to determine the competencies for each job/task and the health and safety training required for management and workers annually.
- Review the training policy and program annually in consultation with stakeholders and the JHSC.

Safety Expert or Designate:

- Determine OHS training needs in consultation with Managers and Supervisors based on:
 - I. Conducting a training needs analysis
 - II. Reviewing legislated and other training requirements such as standards, codes, guidelines, and leading practices
 - III. Taking into consideration different levels of responsibilities, abilities, language and literacy
 - IV. Information on MJDs OHSMS including purpose, roles, responsibilities and rights, importance of conformity, potential consequences for deviations or noncompliance, and the importance of workers participation within the OHSMS.
- Determine how training will be administered and managed.
- Ensure evaluation of learning.
- Maintain corporate training and orientation records follow the Document and Record Control procedure.
- Coordinate initial onboarding training program and checklists for all new and returning workers.

Managers/Supervisors:

- Ensure adequate resources for department-specific worker training.
- Ensure all workers under their supervision receive basic, job-specific training and all the skill(s) needed to protect their health and safety prior to the worker performing the relevant task
- Conduct a health and safety training needs assessment in consultation with the Safety Expert or Designate.
- Develop a training matrix for the staff under their authority including time frames for completion.
- Develop and implement a department-specific orientation program based on a health and safety risk assessment of existing and potential workplace hazards (i.e. conduct a job hazard analysis including review of hazards in the workplace such as chemical, biological, ergonomic, physical, psychosocial, equipment/machine safety etc).
- Coordinate and ensure the delivery of new, transferred and newly promoted worker department-specific orientation and provide ongoing skills development opportunities and follow-up on the development.
- Assess those workers off work for extended periods and determine whether further training or retraining is required.
- Ensure all workers attend their assigned training sessions.
- Ensure workers comply with policies, procedures, safe work practices and safe operating procedures.
- Ensure completion and maintenance of department training checklists and records.

Workers:

- Apply himself/herself in developing the skills and knowledge necessary to do the job safely, to meet the organization's objectives, and to fulfill the requirements of the OHSA and regulations.
- Be aware of his/her skill limitations and not undertake any job for which might endanger his/her or another worker's health or safety.
- Attend required training sessions and not complete any job/task they have not received specific training to complete.
- Provide feedback on training after each session.
- Comply with the OHSA and regulations, policies, procedures, safe work practices and safe operating procedures and report hazards to the Supervisor.

Joint Health and Safety Committee (JHSC):

- Participate in health and safety training program consultation.
- Make recommendations for training programs that come out of workplace inspections and observations.

5. Procedure

5.1 Training Needs Assessment

Senior Management, in consultation with Supervisors and the Safety Expert will identify core competencies for each task/role by conducting a training needs analysis through the Job Hazard Analysis process and through review of the job description.

MJD determines competency based on knowledge, skills, and training, as well as knowledge of the OHSA. It also determines competency based on number of years in the role (minimum 5 years).

Worker competencies and training needs will also be identified through a review of the inventory of occupations, critical tasks, accident investigations, injury analysis data, and a review of applicable legislation. Training needs will also take into consideration different levels of responsibilities within MJD, and the individual's abilities, language skills, literacy and likelihood of exposure to the hazards and risk of the learner.

The Safety Expert in consultation with management, human resources and the JHSC will review the health and safety training needs annually. Training standards for specific jobs will be reviewed in any case of an accident/incident requiring completion of an accident investigation form.

Managers and Supervisors will maintain updated training matrices for workers under their direction. These will outline:

- Corporate and department specific training requirements
- Time frames for training completion
- Record of training and training outcomes

5.2 Orientation Training

The Safety Expert or Designate will identify health and safety training topics and coordinate the Orientation Training program. They will also notify participants of the training expectations, time and location of the Orientation Training.

Orientation Training is required for all new workers and management, young workers, returning workers and workers changing roles with MJD. Orientation Training is mandatory for all workers and must be completed prior to commencing work or work tasks.

Orientation training content for newly hired workers and managers, young workers, returning workers and workers changing roles within MJD, may include but is not limited to:

- Occupational health and safety policy
- OHSA, legislated and organizational roles and responsibilities
- Worker rights and work refusal
- Role of the JHSC
- Location of health and safety boards and posting requirements
- Accident/incident/hazard reporting and investigation procedures including critical injury procedures
- First aid procedures
- Early and safe return to work procedures
- WHMIS training including a test
- General musculoskeletal injury prevention (MSD)
- Workplace violence and harassment

- Fire safety and emergency preparedness, codes and procedures
- General personal protective equipment and requirements
- AODA

Note: All employees are required to have at minimum MOL Health and Safety Awareness for Workers, WHMIS, Violence and Harassment, AODA and Working at Heights (as required by the individual and task).

5.3 Management Health and Safety Training

New or recently promoted management will also receive health and safety training (i.e. competent supervision training) including but not limited to:

- Health and safety roles and responsibilities
- Legislation and standards applicable to the industry and work
- Due diligence
- Hazard awareness, assessment, control and evaluation
- Health and safety inspections
- Incident investigation
- Promotion of health and safety culture

Ongoing refresher training will also be provided.

Note: All supervisory staff will receive MOL's Health and Safety Awareness Training for Supervisors within one week of performing work as a Supervisor.

5.4 Job-Specific Health and Safety Training

Supervisors and managers will provide or coordinate job specific knowledge and skills training for transferred, new and existing workers as outlined in the training matrices. Training will be documented e.g., department specific orientation checklist and/or other training records. Training content will be determined based on the previously mentioned needs assessment.

Certain training requirements must be provided prior to the worker performing the relevant task, including legislated mandatory training, and any other training deemed to be necessary before performing work. Supervisors will need to ensure workers are trained in how to do the following:

- Perform tasks safely
- Operate machinery and equipment safely
- Use and maintain any required PPE
- Follow safe work practices and safe job procedures
- Hazard and incident reporting

Job-specific topics for example may include but are not limited to:

- Forklift operator/material handler
- Fire extinguisher use and care
- Slips, trips and falls
- Ergonomic equipment setup
- Confined Space
- Incident reporting and investigations
- First Aid and CPR

5.5 Site Orientation

It is MJDs policy that trade contractors ensure its workers engaged on our projects, are aware of:

- Their obligations under the Occupational Health and Safety Act.
- Specific hazards to the site and of the work.
- MJ Dixon Construction Limited Health and Safety Policy.

It is MJDs policy during pre-award negotiations with any subcontractor, that the subcontractor be made aware of and become contractually bound to MJ Dixon Construction Limited's Health & Safety Policy. This process fosters the desired attitudes and reinforces MJ Dixon Construction Limited commitment to a safe work environment. The project superintendent or his competent replacement in collaboration with the Project Manager shall ensure that all employees, direct or sub-contractual, are orientated to our safety policy and program. Personal protective equipment required and the proper use of safety equipment in construction should be communicated to all employees before commencement of work.

Any worker coming to a project site for the first time requires a site orientation. The site supervisor is responsible for providing this orientation before the worker is allowed to start work. This orientation will be documented and will include signatures from the new employee and the employee providing the orientation.

6. In-House Trainer Qualifications

MJD Senior Managers are responsible for ensuring that in-house trainers are competent to fulfill the knowledge requirements of an in-house trainer.

Competency will be based on having the proper knowledge, skills and training. The process for ensuring in-house trainers is competent includes a combination of the following:

- Having prior experience in the area of knowledge
- Be successful communicators with strong verbal and directional skills
- Successful completion of a practical operating exam and/or demonstration of a skills test administered by competent and authorized personnel
- Possession of certification or adequate proof of training appropriate to the topic
- For training programs involving equipment operation, instructor/trainer must be competent on all equipment types and attachments

Training that cannot be completed in-house will be conducted by approved, 3rd party training providers or use of web-based health and safety training programs.

7. Training Implementation and Recordkeeping

All new and existing management and staff will be trained on this policy and procedures at orientation or at the department level.

All training and orientation records will be documented and include:

- Title of training program
- Date of training
- Instructors name
- Worker signature unless special electronic verification systems are in place e.g., use of worker unique identifiers
- Location of the training (i.e., in-class, online, off-site)

All training courses must have a testing component to evaluate learning and assure workers comprehension of the materials were understood. This could be done in a quiz or test depending on worker literacy levels. Some may need to be quizzed orally by a competent instructor.

The Safety Expert or Designate will keep a record of all training. Managers and Supervisors will also submit copies of department training records to the Safety Expert or Designate upon training completion.

Workers and management that participate in health and safety training outside MJD must submit a copy of training records and/or certification and with a summary of the training content, to their Manager/Supervisor. Supervisors will ensure a copy of the training is submitted to the Safety Expert or Designate for the worker file.

Managers/Supervisors will also maintain department training records and health and safety training matrix on each worker detailing what the worker has been trained in and when the training was done.

8. Evaluation

This policy will be evaluated annually by Senior Management in consultation with the JHSC. Upon consideration of recommendations, quality improvements will be implemented as required.

Supervisors and managers will audit their training matrices at least annually to ensure all workers under their authority have completed the necessary health and safety training. Evaluations of the training completeness, learning and compliance will be part of the worker performance evaluation process. Supervisors and managers will update the training matrices annually based on the annual needs assessment.

Management coordinating training programs will at least annually review the overall effectiveness of training program content and delivery methods in light of changes in legislation and standards, best and leading industry practices and feedback from participants and worker performance etc. Based on the review and training program recommendations, quality improvements will be made in consultation with relevant workplace parties.

9. Revisions

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	February 2023	<ul style="list-style-type: none"> Updated Section 5.1: Training Needs Assessment Updated 5.3: Management Health and Safety Training Updated 5.4: Job-Specific Health and Safety Training Updated Section 6: In-House Training Qualifications Added Section 8: Revisions <i>*Changes made to reflect COR 2020 external audit review and findings.</i>	Paul Chiang
Mauricio Carmona	July 2024	<ul style="list-style-type: none"> Annual review. No changes made. 	Paul Chiang
HSE Department	July 2025	<ul style="list-style-type: none"> Annual review. No changes made. 	Paul Chiang

COMMUNICATION POLICY STATEMENT

Document Name: Communication Policy Statement	Document Number: SJP78
Prepared by: Mauricio Carmona	Date of Issue: February 2023
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: No Change

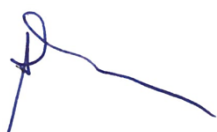
M.J. Dixon Construction Limited (MJD) believes that communication is the key to a healthy, safe, and productive workplace. It is needed to ensure roles and directions are understood; to warn against dangers; to avoid unsafe practices; to promote critical emergency response and particularly to learn about (and from) the concerns and hazards that workers encounter on the job.

MJD understands the importance of maintaining an open line of communication between all workplace parties and utilizes various communication channels to create a dialogue among management and workers. This communication is both formal and informal, scheduled and routine, and in response to various emergencies, incidents that have occurred, or in direct response to a risk.

While the level of communication at MJD is dependent on several factors, the primary purpose of communication between MJDs Management Team and an employee is to ensure that the employee is familiar with workplace hazards, knows what controls need to be implemented to perform the job or task safely and has the necessary tools and equipment (including personal protective equipment) to do so.

All employees at MJD are expected to communicate safety issues and concerns to the supervisor in addition to their co-workers, Joint Health Safety Committed members, or anyone who may affected by their undertaking. It is only through discussing hazards openly that the best approach can be taken to minimize the risk associated with a particular hazard.

MJD has a program that further implements this policy and will be reviewed at least annually.



July 2025

MJ Dixon Construction Ltd. - Vice President

Date

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	Feb. 2024	<ul style="list-style-type: none"> Annual review. No changes made. 	Paul Chiang
HSE Dept.	July 2025	<ul style="list-style-type: none"> Annual review. No changes made. 	Paul Chiang

COMMUNICATION PROCEDURE

Document Name: Communication Procedure	Document Number: SJP37
Prepared by: Mauricio Carmona	Date of Issue: August 2022
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: 1

1. Purpose

M.J. Dixon Construction Limited (MJD) believes that communication is the key to a healthy, safe and productive workplace. The following procedure outlines the process for communication on items related to health and safety, the various channels used by the company to facilitate communication, and how they are to be used as a means for two-way communication and dialogue among management and workers.

2. Scope

This procedure applies to all workplace parties at MJD.

3. Definitions

Communication: Means of sending or receiving information.

4. Roles and Responsibilities

Senior Management:

- Hold regularly scheduled organization-wide OHS meetings with all employees that include the OHSMS and its implementation at least annually
- Attend and participate in organization-wide OHS meetings and ensure two-way communication exists between Management and employees
- Meet at least twice annually with the Management Team to discuss safety-related issues and provide status updates on divisional objectives, as well as to discuss areas of OHS concern within the division
 - These meetings, which are considered a key performance area for the department, must be documented and the information forwarded to the Safety Expert or Designate

Managers/Supervisors:

- Communicate regularly with employees to ensure expectations are clear and that controls required to reduce risk are understood and implemented; communication should include, at a minimum:
 - Making an employee familiar with the hazards and their associated controls
 - Information on the necessary tools and equipment (including personal protective equipment) to conduct a task safely
 - Reference to information on past incidents related to the task being performed and investigation outcomes
 - Any information from the Ministry of Labour (MOL) inspections and/or orders as well as any observations or findings from inspections or MOL Orders that the Manager/Supervisor is aware of
 - Information shared by the worker rep on the JHSC

- Ensure staff are familiar with various modes of communication used by the company to share information on the health and safety system, such as:
 - Health and Safety Board
 - Company Intranet
 - Safety Debriefs
 - Tailgate or toolbox talks or their equivalent (held weekly)
- Ensure communication is delivered in a manner that is understood by the receiver of the message and considers ability, language skills and literacy
- Allow opportunity for input from workers
- Informing the Safety Expert or Designate(s) of any gaps in communication, with possible solutions on how to close those gaps

Safety Expert or Designate(s):

- Ensure all Managers/Supervisors receive all necessary information required to be communicated to staff
- Plan out company-wide communication initiatives related to safety
- Ensure all legislatively required documentation (e.g., certificates, posters, MOL orders, etc.) are created and posted, and employees are made aware of them
- Manage communication to media in relation to any emergency that arises
- Review this procedure, and all associated forms, annually, at minimum

Human Resources:

- Contact an injured employee's emergency contact, if further medical assistance is required, as per the Incident Response Procedure

Joint Health and Safety Committee (JHSC):

- Assist with the evaluation of the program by reviewing the policy/program annually, at a minimum, as required and requested

Workers:

- Follow all instructions communicated to them via the various channels identified in this procedure
- Communicate all safety issues and concerns (including incidents) to their Manager/ Supervisor

Contractors:

- Communicate hazard information prior to work commencing to the appropriate stakeholders at the company and report incidents when they happen
- Communicate hazards and appropriate controls to their workers and inform the companies representative overseeing the contract of issues and concerns that arise during the project or service
 - Hazard reports, incident reports, site specific safety plans, training records, person in charge, etc. are examples of information which must be communicated to the company's representative

5. Procedure

- All policies and procedures shall be written and incorporated into the health and safety system, and distributed to members of Management, who shall:
 - I. Familiarize themselves with the contents of the OHS program;

- II. Verbally communicate applicable rights and responsibilities with their employees; and
- III. Make the information available to all company staff, contractors, and visitors to their work area.

5.1 Communication Topics

Communicated health and safety information may include, but is not limited to the following:

- New or updated health and safety policies and procedures;
- Incident trend analysis;
- Incidents and investigations;
- Hazard, First Aid and Emergency Drill reports;
- Workplace inspections;
- JHSC inspections and minutes; and,
- MOL reports.

5.2 Methods of Communication

The method of communication that will be most effective, within each department, will be unique to the working unit, the nature of the work, the information that must be conveyed, the number of employees that are required to receive the information and the complexity of the information. Removing barriers to communication by communicating the latest and all updated health and safety information with all parties will help employees make the right decisions when it comes to health and safety issues or concerns.

The following are possible approaches to communicating workplace health and safety information:

- Individual or group training sessions;
- JHSC meetings and minutes;
- New employee orientation;
- Job training;
- Health and Safety Board postings;
- Company Intranet;
- Tailgate, Safety Talks, Toolbox talks;
- Warning signs;
- Direct communication between Management/Supervisors and employees;
- Company email;
- Town Hall Meetings; and/or,
- Other department meetings held by the organization.

In addition to conveying information to employees, Senior Management and department Managers/Supervisors shall identify methods of getting input, suggestions, ideas and feedback from all employees, including but not limited to suggestion boxes, feedback surveys, and question/answer sessions during regularly held meetings.

5.3 Company-wide Meetings

Senior Management will hold regularly scheduled organization-wide OHS meetings with all employees that include the OHSMS and its implementation on a weekly basis. This meeting will be used to communicate the following health and safety information:

- Programs, policies, and procedures
- Records and statistics
- Inspections
- Accidents and injuries
- Tailgates, Toolbox Talks or their Equivalent
- Introduction or changes to health and safety legislation, information, and technology

All documentation required for the meetings including agendas, memos and meeting minutes will be prepared and recorded by the Safety Expert. Action items relating to the meeting will be assign in the company's management system software.

5.4 Management Meetings

On a monthly basis, Managers/Supervisors report to the Safety Expert or Designate and Senior Management on several safety related items which have been monitored over the previous month. Standing items reported on are:

- Incident Data
- OHS Order/Directive compliance
- OHS Committee compliance
- Updates on recent safety initiatives specific to the Department

These monthly meetings are considered a key performance indicator for the Department.

5.5 Tailgate or Toolbox Talks

The purpose of tailgate, toolbox talks, or their equivalent is to provide information, instruction and supervision to a worker to protect the health and safety of a worker. MJD will conduct weekly tailgates, toolbox talks or their equivalent with all employees under their control (intended for field employees as opposed to office workers). Such meetings will be held during normal work time and can be approximately 15 minutes in duration. They also act as a means for workers to participate in their personal safety. Tailgates and toolbox talks are documented via HSM003-Toolbox Safety Meeting and uploaded to the Company's management system software for acknowledgement by all employees.

5.6 JHSC Communications

As required by legislation, JHSCs are expected to communicate the minutes of JHSC meetings and results of any workplace inspections.

The JHSC is also required to post a hard copy of the minutes in a conspicuous location, on the site Health & Safety Board.

5.7 Internal and External Communications

Receiving, documenting and responding to internal and external communications (i.e. provincial authorities or media) will be conducted by the Safety Expert in a timely manner or as prescribed by legislation.

5.8 Participation in Health and Safety Communication

Health and safety information is more effective when it is 'two-way' - from management to workers and from workers to management. Participation of Senior Management in safety communications is crucial to successful communication. Management participation in safety talks, safety meetings and communicating with crews during worksite inspections is strongly encouraged.

Employees are encouraged to participate in department health and safety meetings and provide ideas, suggestions and feedback for continuous improvement.

6. Forms

Methods of communication such as meetings, town halls, toolbox talks, and employee training sessions will be documented using forms:

- HSM001 – Management Review Meeting
- HSM002 – Quarterly JHSC Meeting Minutes
- HSM003 – Toolbox Safety Meeting
- HSM004 – Contractor and Subcontractor Site Safety Kick-off Meeting

Forms will be stored in on the Company's management system software and in accordance with the **Document and Record Control Procedure**.

After meeting review, the minutes of meetings will be posted on the Health and Safety Board.

7. Training

Training on this procedure will be scheduled by the Safety Expert or Delegate. Appropriate tests or quizzes will be administered, and records maintained with the Health and Safety Department, as appropriate.

All MJD training programs will consider alternate forms of training and communication to ensure it is understood by the receiver. This includes accommodating language, ability and literacy barriers in the form of providing documentation in the dominant language of the workforce, or through visuals.

8. Recordkeeping

- All internal and external OHS communications shall be received, documented and properly responded to in an appropriate timeframe.
- Communications shall be documented utilizing Attendance Records, Agendas, Meeting Minutes, Tailgate and Toolbox Talks or via the company's management system software.
- All documents and records shall be maintained as per the procedure **Document and Record Control**.

9. Revisions

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	February 2023	<ul style="list-style-type: none"> • Added 5.1 Communication Topics • Added 5.2 Methods of Communication 	Paul Chiang

		<ul style="list-style-type: none"> • Added 5.3 Company-wide Meetings • Added 5.4 Management Meetings • Added 5.5 Tailgate or Toolbox Talks • Added 5.6 JHSC Communications • Added 5.7 Internal and External Communications • Added 5.8 Participation in Health and Safety Communications • Updated Section 6 Forms • Added 7 Training • Added 9 Revisions <p><i>*Changes made to reflect COR 2020 external audit review and findings.</i></p>	
Mauricio Carmona	February 2024	<ul style="list-style-type: none"> • Annual review. No changes made. 	Paul Chiang
HSE Dept.	July 2025	<ul style="list-style-type: none"> • Annual review. No changes made. 	Paul Chiang

CHAPTER EIGHT

WORKPLACE INSPECTIONS

WORKPLACE INSPECTIONS POLICY STATEMENT

Document Name: Workplace Inspections Policy Statement	Document Number: SJP20
Prepared by: Mauricio Carmona	Date of Issue: August 2022
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: No Change

M.J. Construction Limited (MJD) recognizes that all workplace parties have a role to play in identifying and eliminating actual and/or potential hazards associated with people, equipment, environment, and processes through regular workplace inspections.

In accordance with Occupational Health and Safety Act (OHSA), applicable regulations and manufacturer guidelines, MJD will establish, implement, monitor, and maintain a Workplace Inspection Policy and Procedure that includes:

- A list of items in the workplace to be inspected,
- Identification of when inspections are to be completed and who must complete them, and
- Standard forms and checklists used for recording inspections.

Hazards identified through workplace inspections shall be communicated and appropriate corrective actions taken to address the hazard(s) in a timely manner. Follow-up inspections will be conducted to ensure identified issues have been appropriately resolved.

MJD will also conduct a yearly internal Certificate of Recognition (COR) audit and schedule an external audit to maintain the Company's COR status to help measure health and safety performance.

This policy will be reviewed at least annually, and records of review maintained.



MJ Dixon Construction Ltd. – Vice President

July 2025

Date

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	July 2023	<ul style="list-style-type: none"> Annual review. No changes made. 	Paul Chiang
Mauricio Carmona	July 2024	<ul style="list-style-type: none"> Annual review. No changes made. 	Paul Chiang
HSE Dept.	July 2025	<ul style="list-style-type: none"> Annual review. No changes made. 	Paul Chiang

WORKPLACE INSPECTIONS PROCEDURE

Document Name: Workplace Inspections Procedure	Document Number: SJP38
Prepared by: Mauricio Carmona	Date of Issue: August 2021
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: 2

1. Purpose

It is the M.J. Dixon Construction Limited (MJD) policy to perform work in the safest possible way, consistent with good construction practice. To enhance safe working conditions and practices on our projects, and to prevent accidents from happening, safety inspections shall be conducted at all MJD work sites regularly.

2. Scope

This procedure applies to all MJD employees, including subcontractors. MJD reserves the right to remove anyone who causes an unsafe condition to exist, or who refuses or neglects to perform in a manner consistent with the safety statutes and our safety policy.

3. Roles and Responsibilities

Senior Management:

- Create an inventory of workplace items (equipment, machinery, tools, etc.) that must be inspected.
- Create inspection frequencies and who is responsible for conducting them.
- Ensure inspection frequencies are being adhered to.
- Ensure workplace and pre-use inspections meet all legislative and manufacturer's requirements (i.e., Regulation 1101 First Aid Requirements).
- Ensure specific forms are utilized for recording workplace and pre-use inspections.
- If a safety issue with equipment is brought to their attention, management will take the necessary remedial action in a timely manner.
- Review inspection reports.

Supervisors:

- Conduct and keep records for workplace inspections (as per the inspection schedule), including identifying and preventing potential nonconformities and corrective actions.
- Conduct and keep records for pre-use inspections of vehicles, machines, tools and equipment including corrective actions.
- Ensure worker participation in the inspection process.
- Ensure the results of workplace inspection are communicated to Senior Management and other relevant workplace parties.
- Inform workers of identified deficiencies and corrective actions taken.
- Ensure identified deficiencies are corrected in a timely manner as per the procedure.

Workers:

- Conduct a daily pre-use inspection as per the procedure and report any deficiency in a timely manner to their Supervisor.
- Participate in the inspection process, where and when required.

Health and Safety Representative/Joint Health and Safety Committee (JHSC):

- Complete a monthly inspection of job sites.

Office JHSC:

- Conduct an inspection of the office/shop on a monthly basis.
- Complete the applicable form during the inspection.
- Make necessary recommendations to Management based on inspections.

4. Procedure**4.1 PROJECT SUPERINTENDENT INSPECTIONS**

The project superintendent or a competent person appointed by the supervisor will perform a weekly inspection of their site through the company's management system software. The inspection will include the inspection of all machinery and equipment, including fire extinguishing equipment, magazines, electrical installations, communication systems, sanitation and medical facilities, building and other structures, temporary supports and means of access and egress at the project to ensure that they do not endanger any worker. Any deficiencies found will be sent to management, and corrective actions will be taken in a timely manner.

(Reference: Construction Projects Regulation 213/91, s.14(3), (4))

4.2 SITE HEALTH AND SAFETY REPRESENTATIVE INSPECTIONS

On project sites with 6-19 regularly employed workers, the Site Health and Safety Representative will perform an inspection of that site monthly. The inspection will be documented, and a report will be provided to the project superintendent to post on site. (Reference: Occupational Health and Act s. 8(6))

4.3 JOINT HEALTH AND SAFETY COMMITTEE (JHSC) INSPECTIONS

On project sites with more than 19 regularly employed workers, the Site JHSC will perform an inspection of that site monthly. The inspection will be documented, and a report will be provided to the project superintendent and will be discussed during the next JHSC meeting. The inspection report will be posted on site. (Reference: Occupational Health and Act s. 9(23)-(28))

A worker representative of MJDs JHSC will perform a workplace inspection of the office on a monthly basis. The inspection will be documented and will be reviewed during the next JHSC meeting. The inspection report will be posted on site. During any JHSC inspection, a minimum of one worker will be interviewed to address any of their concerns regarding health and safety at the workplace.

JHSC inspections will be recorded utilizing the Company's software management system.

4.5 MANAGEMENT INSPECTIONS

Senior Management will conduct at least one site inspection annually. Appropriate personnel will be notified of deficiencies found, and corrective action will be taken immediately.

4.6 THIRD PARTY INSPECTIONS

A third-party consultant will inspect random sites each month. Each report will be sent to management, who will take corrective actions if necessary.

4.7 EQUIPMENT PRE-USE INSPECTIONS

All vehicles, machines, tools and equipment shall be used in accordance with any operating manuals issued by the manufacturers.

For vehicles, machines, tools and equipment rated at greater than 10 horsepower, copies of any operating manuals issued by the manufacturers shall be kept readily available at the project.

All mechanically powered vehicles, machines, tools and equipment rated at greater than 10 horsepower shall be inspected by a competent worker to determine whether they can handle their rated capacity and to identify any defects or hazardous conditions.

The inspections shall be performed before the vehicles, machines, tools or equipment are first used at the project and thereafter at least once a year or more frequently as recommended by the manufacturer

All machineries and equipment are inspected using equipment specific inspection checklists that were designed with the manufacturer's manuals. Tool inspections are conducted during daily Pre-Job Safety Assessments (PSAs).

Vehicle Inspection Reports are completed monthly.

(Ref: Construction Projects Regulation 213/91, s. 93(3)(4), 94 (1),(2)

4.8 SCHEDULE & FORMS

Type of Inspection	Frequency	Who	Form Utilized
Machinery/Equipment/PPE	Daily	Equipment Operator	Equipment-Specific inspections will be done on paper and kept at the site HSF010-Full Body Harness Inspection (Pre-Use/Annually)
Tools	Daily	Site Superintendent	HSF001-Pre-Job Hazard Assessment - (PHA*)
Vehicle	Monthly	Senior Management	HSF004 - Monthly Vehicle Inspection
Site	Weekly	Site Superintendent	HSF003-Weekly Supervisor Workplace Inspection
Site	Monthly	Site HSR or JHSC work rep (if applicable)	HSF006 - H&S Rep Monthly Inspection
Office	Monthly	JHSC	HSF006 - H&S Rep Monthly Inspection

Workplace	Annually	Senior Management	HSF009-Senior Management Site Inspection Report
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4.9 FOLLOW UP AND CORRECTIVE ACTIONS

Identified deficiencies will be corrected immediately, if possible. Nonconformities and corrective actions will be documented on the inspection form used. If required, management will be notified of deficiencies. Workers affected by the hazard must be informed and corrective actions must be taken. Management will monitor the completion of inspections.

4.10 COMMUNICATION

Results of workplace inspections will be communicated to Senior Management by Project Superintendents, the JHSC and HSR on a regular basis (i.e, at Management Meetings or JHSC meetings).

All completed reports utilizing the Company's management system software will be forwarded to the Safety Expert for review and sign-off that the inspection was completed in compliance with this procedure.

JHSC or HSR workplace inspection reports will also be posted on MJDs Health and Safety Boards, which are in various locations (project site and office).

Potential communication with contractors/subcontractors will be done on site by the Project Superintendent, if required.

4.11 RECORD RETENTION

All complete workplace inspections must be submitted through the Company's management system software on a weekly and monthly basis. They will be reviewed and signed-off on by the Safety Expert.

Workplace inspection report forms, including pre-use inspections of vehicles, machines, tools, and equipment and any subsequent follow-up (including identifying and preventing potential non-conformities and corrective actions) must be maintained on file for the duration of the project or facility and maintained on file for 10 years.

5. Revisions

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	July 2022	<ul style="list-style-type: none"> Added Section Numbers Roles and Responsibilities moved to Section 3 Updated Management, Supervisor and Worker Roles and Responsibilities Added Section 4.10: Communication <i>*Changes made to reflect COR 2020 requirements</i>	Paul Chiang

Mauricio Carmona	February 2023	<ul style="list-style-type: none"> • Updated 4.8 Schedule and Forms • Updated 4.10 Communication • Added 4.11 Record Retention <p><i>*Changes made to reflect COR 2020 external audit review and findings.</i></p>	Paul Chiang
Mauricio Carmona	February 2024	<ul style="list-style-type: none"> • Annual review. No changes made. 	Paul Chiang
HSE Dept.	July 2025	<ul style="list-style-type: none"> • Annual review. No changes made. 	Paul Chiang

CHAPTER NINE

INVESTIGATIONS AND REPORTING

INVESTIGATIONS AND REPORTING POLICY STATEMENT

Document Name: Investigations and Reporting Policy Statement	Document Number: SJP21
Prepared by: Mauricio Carmona	Date of Issue: August 2022
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: No Change

M.J. Dixon Construction Limited (MJD) is committed to the health, safety and wellbeing of all its employees. In the event of injury, illness and/or incident arising out of the course of employment, MJD will promptly report and investigate forthwith. MJD is also committed to the proper evaluation and root cause analysis of all injuries, illnesses and/or incidents so suitable corrective and preventative measures can be implemented.

MJD requires that all workers report incidents, injuries, property damage and near misses to the reporting Supervisor immediately after an occurrence. Reporting of these incidents provides opportunities to improve the performance of MJDs health and safety programs, the quality of the working environment and the safety of all workers, and to ensure compliance with the Occupational Health & Safety Act (OSHA) and the Workplace Safety & Insurance Act (WSIA).

MJD has a corresponding program that outlines the roles and responsibilities of all workplace parties for incident investigation, analysis, and reporting.

This policy will be reviewed annually.



MJ Dixon Construction Ltd. – Vice President

July 2025

Date

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	July 2023	<ul style="list-style-type: none"> Annual review. No changes made. 	Paul Chiang
Mauricio Carmona	July 2024	<ul style="list-style-type: none"> Annual review. No changes made. 	Paul Chiang
HSE Dept.	July 2025	<ul style="list-style-type: none"> Annual review. No changes made. 	Paul Chiang

INVESTIGATIONS AND REPORTING PROCEDURE

Document Name: Investigations and Reporting Procedure	Document Number: SJP29
Prepared by: Mauricio Carmona	Date of Issue: August 2021
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: 2

1. Policy

It is M.J. Dixon Construction Limited (MJD) policy that any incident or any injury resulting from an accident is to be promptly reported to the project superintendent or his competent replacement and investigated forthwith. All injuries or incidents caused by or involving a subcontractor on our projects must be reported immediately to our project superintendent and an accident investigation report containing all pertinent information and future preventative measures shall be forwarded to the project superintendent or his competent replacement within 24 hours of the occurrence. The project superintendent or his competent replacement is responsible for evaluating the cause of all incidents and the possible effect on other workers doing similar tasks, so that suitable preventative measures can be implemented.

For more information on this policy, refer to: **Incident Investigations and Reporting Policy Statement.**

2. Purpose

The objective of this procedure is to ensure all incidents/accidents are reported to Supervisors, and that investigations are carried out as may be required. The goal of an investigation is to find the root cause of the incident and develop corrective actions to prevent the same incident from occurring again. This procedure will also ensure the MOL/WSIB is reported to within the required time frame.

3. Scope

This procedure applies to all MJD employees, including subcontractors.

4. Definitions:

Lost Time Injury (LTI) refers to any injury that prevents a worker from coming to work on the day following the day of the injury.

Medical Aid refers to any injury not severe enough to warrant more than the day of injury off, but where medical treatment by a doctor is given.

First Aid refers only to injuries that can be treated on the job without any days lost. An Incident is defined as property damage but with no injury to workers.

Near Miss is a situation in which no injury or damage occurred but might have if conditions had been slightly different.

Occupational Illness is defined as a condition resulting from a worker's exposure to chemical, biological or physical agents in the workplace to the extent that the health of the worker is impaired.

Critical Injury is defined as an injury of a serious nature that:

- Places life in jeopardy; O Produces unconsciousness; O Results in substantial loss of blood;
- Involves the fracture of a leg, arm, fingers and toes (but not a single finger or toe); Involves the amputation of a leg, arm, hand, foot, fingers and toes (but not a single finger or toe);
- Consists of burns to a major portion of the body; or
- Causes the loss of sight to an eye.

5. Roles and Responsibilities

Senior Management:

- Ensure training is provided to appropriate workplace parties, in legislative and organization specific reporting requirements and investigation procedures.
- Review investigation reports.
- Implement necessary corrective actions.
- Follow up on corrective actions.
- Ensure a process is in place to measure the effectiveness of corrective and preventative actions.

Supervisors:

- Investigate in a timely manner.
- Complete the Complete investigations utilizing the Incident/Accident Report Form (HSF022) or Hazard Report (HSF020) on the Company's management system software.
- Determine and implement corrective and preventative actions identified as a result of investigations.
- Take action to mitigate any additional consequences of the incident.
- Determine OHS deficiencies including root cause of the incident.
- Communicate investigation results and correct and preventative actions to interested parties.
- Maintain records of incident reporting and investigation results.

Workers:

- Report all accidents/incidents to their Supervisor (including near misses).

Joint Health and Safety Committee (JHSC):

- Review all incident investigation reports (JHSC only).
- Recommend any corrective actions to Management.
- Accompany the Supervisor during an investigation, if required.

6. Procedure

NOTIFICATION PROCEDURES

All incidents will be documented and reported to a MJD Supervisor.

FATALITY/CRITICAL INJURIES

When an accident occurs and results in the critical injury or death of a worker, the following contacts must be notified immediately:

1. MJD Superintendent or Competent Replacement
2. MJD General Supervisor
3. MJD Project Manager
4. MJD General Manager
5. MJD Vice President
6. MJD President
7. The nearest MOL office
8. The direct employer of injured employee
9. MJD Safety Expert
10. Joint Health and Safety Committee/ Health and Safety Representative

MEDICAL AND LOST TIME INJURIES

When an accident occurs which results in an injury requiring medical aid to a worker, the following contacts should be notified:

1. MJD Superintendent or Competent Replacement
2. MJD Project Manager
3. The nearest MOL office
4. The direct employer of injured employee
5. MJD Safety Expert
6. Joint Health and Safety Committee, Health and Safety Representative

FIRST AID INJURIES

For minor injuries requiring First Aid, the following contacts should be notified:

1. MJD Superintendent or Competent Replacement
2. MJD Project Manager
3. The Supervisor of Injured Worker
4. The Employer of Injured Worker
5. MJD Safety Expert

NEAR MISS INCIDENTS WITH INJURY OR PROPERTY DAMAGE POTENTIAL

For near miss incidents with the potential to cause injury or property damage:

- MJD Superintendent or Competent Replacement
- The nearest MOL office
- The Supervisor of Injured Worker
- The Employer of Injured Worker
- MJD Safety Expert

REPORTING TIMELINE

Type of Incident or Accident	Reported to	When to report	How to report
If a person, whether a worker or not, has been critically injured or killed at the workplace	Ministry of Labour Health & Safety Contact Centre JHSC/Health and Safety Representative	Immediately	By Telephone or direct means
	A director of the Ministry of Labour	Within 48 hours	In writing
If an accident, explosion or fire occurs, or if there is an incident of workplace violence, and a person is disabled or requires medical attention	A director of the Ministry of Labour JHSC/Health and Safety Representative	Within 4 days	In writing
If occupational illness or that a claim for an occupational illness has been filed with the Workplace Safety and Insurance Board	A director of the Ministry of Labour JHSC/Health and Safety Representative	Within 4 days of being advised	In writing

If the injured worker: <ul style="list-style-type: none"> requires treatment from a health professional (beyond first aid), or is absent from, or earns less than regular pay 	WSIB	Within 3 days	In writing
If the injured worker: <ul style="list-style-type: none"> does not receive health care, and requires modified work due to the injury or illness, and has been doing modified work at regular pay for more than 7 days 	WSIB	8th day of modified work.	In writing
Near Miss Reporting – Project Site <ul style="list-style-type: none"> An accident, premature or unexpected explosion, fire, flood or inrush of water, failure of any equipment, machine, device, article or thing, cave-in, subsidence, rockburst, or other prescribed incident 	A director of the Ministry of Labour JHSC/Health and Safety Representative	Within 2 days	

*** Reference: Occupational Health and Safety Act s.51-53.1, WSIB**

The following incidents at project sites are considered as near misses, which must be reported to MOL.

1. A worker falling a vertical distance of three metres or more.
2. A worker falling and having the fall arrested by a fall arrest system other than a fall restricting system.
3. A worker becoming unconscious for any reason.
4. Accidental contact by a worker or by a worker's tool or equipment with energized electrical equipment, installations or conductors.
5. Accidental contact by a crane, similar hoisting device, backhoe, power shovel or other vehicle or equipment or its load with an energized electrical conductor rated at more than 750 volts.
6. Structural failure of all or part of falsework designed by, or required by this Regulation to be designed by, a professional engineer.
7. Structural failure of a principal supporting member, including a column, beam, wall or truss, of a structure.
8. Failure of all or part of the structural supports of a scaffold.
9. Structural failure of all or part of an earth- or water-retaining structure, including a failure of the temporary or permanent supports for a shaft, tunnel, caisson, cofferdam or trench.
10. Failure of a wall of an excavation or of similar earthwork with respect to which a professional engineer has given a written opinion that the stability of the wall is such that no worker will be endangered by it.
11. Overturning or the structural failure of all or part of a crane or similar hoisting device.

*** Reference: Construction Projects Regulation 213/91, s.11**

INJURY RESPONSE PROCEDURES

FIRST AID ONLY

1. Have the designated first aid attendant treat the injured person and record the particulars in the first aid treatment logbook.
2. Inform the injured person to notify his foreman or head office immediately if, due to complications, he visits his/her doctor
3. Provide the injured person with a treatment memorandum if there is any possibility he may visit his doctor and instruct him/her to sign and give the memorandum to the doctor to fill out. The top copy of this form should be returned to the employer by the injured worker on the next day.

INVESTIGATING ALL OTHER INCIDENTS

The following is the procedure to be followed when investigating incidents:

1. Provide immediate first aid treatment and arrange the transportation of the injured worker to a medical facility.
2. Escort the injured person to a medical facility. Have the injured person sign the treatment memorandum and give it to the doctor to fill out.
3. Preserve the accident scene for an accident investigation.
4. Phone senior management and report the circumstances.
5. The supervisor, with the assistance of the Health and Safety Representative or the JHSC Worker Representative, must investigate the accident and report in writing to senior management. Senior management may however, elect to follow-up with a professional investigation. The initial investigation should be completed within 24 hours.
6. During the investigation, witnesses (if any) must be interviewed.
7. The root cause of the incident must be identified, along with corrective actions to prevent the incident from reoccurring.
8. Follow-up on the injured person's progress, the WSIB claim status and modified duties will be performed by the Supervisor or Management.

ANY FIRST AID TREATMENT WHICH BECOMES A MEDICAL SITUATION MUST BE REPORTED BY THE INJURED WORKER TO HIS FOREMAN OR HEAD OFFICE IMMEDIATELY SO THE PROPER WSIB FORMS CAN BE PROCESSED.

FOLLOW UP AND CORRECTIVE ACTIONS

It is the responsibility of the person completing the Hazard or Incident Investigation Form (i.e., Superintendent, Safety Expert, or other) to determine OHS deficiencies, including root causes and contributing factors that played into the cause of the incident.

JHSC will review all incident investigation reports and make recommendations for corrective actions to management. Management will be responsible for taking action to mitigate any additional consequences of the incident as soon as practicable to prevent reoccurrence. All corrective and preventative actions, if taken, will be communicated to all personnel of MJD through safety meetings, toolbox talks, or posted material.

The report shall include the following:

1. Name and the address of the Employer and Constructor
2. The nature and circumstance of the occurrence and a description of the bodily injury sustained.
3. A description of the equipment and/or machinery involved.
4. The time and place of the occurrence.
5. The name and addresses of all witnesses to the occurrence.
6. The name and address of the person who was killed or critically injured.
7. The name and address of the physician or surgeon, if any, by whom the person was or is being attended to the injury.
8. The steps taken to prevent recurrence.

7. Record Retention

All records will be maintained on site and copies distributed to the Safety Expert through MJDs management system software. Records are to be reviewed and sign-off on for completion by the Safety Expert.

Identifying information about any individuals involved in the incident will not be disclosed unless necessary for the purposes of investigating the incident or complaint, or for taking corrective action, or is otherwise required by law.

Records of incident reporting and investigation results shall be maintained by MJD for a period of 10 years.

8. Training

All MJD workers involved in incident investigations and reporting (i.e., JHSC committee members, managers, supervisors, and health and safety department members) will be trained on their legislative duties and the requirements of this procedure (uploaded through the company's management software system for review and acknowledgement).

Additional training may be provided by an approved, 3rd party training provider at a designated facility or delivered as an on-line e-learning course. Training will be conducted every three years.

Training on internal processes will take place annually, or if earlier if there are changes to the program.

Records of training will be kept in the employee's personal file by the Safety Expert.

9. Evaluation

Management and Site Superintendents in coordination with the JHSC are responsible for reviewing corrective and preventative actions regularly to measure effectiveness as well as to ensure that no further hazards are created as a result of implementation.

Review of each corrective action will take place a month after implementation at monthly Management Meetings and monthly JHSC meetings. Verification must take place prior to closing the corrective action.

Evaluation and verification will be recorded via meeting minutes or inspection reports through the Company's management system software.

This procedure will be evaluated as required or if an investigation identifies revisions are required.

10. Revisions

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	July 2022	<ul style="list-style-type: none"> Added Section Numbers Roles and Responsibilities moved to Section 3 Updated Management, Supervisor and Worker Roles and Responsibilities Added Sections 7-10 <i>*Changes made to reflect COR 2020 requirements</i>	Paul Chiang
Mauricio Carmona	February 2023	<ul style="list-style-type: none"> Updated Follow-up and Corrective Actions Updated Section 7 Record Retention Updated Section 8 Training Updated Section 9 Evaluation <i>*Changes made to reflect COR 2020 external audit review and findings.</i>	Paul Chiang
Mauricio Carmona	February 2024	<ul style="list-style-type: none"> Annual review. No changes made. 	Pau Chiang
HSE Dept.	July 2025	<ul style="list-style-type: none"> Annual review. No changes made. 	Paul Chiang

CHAPTER TEN

EMERGENCY PREPAREDNESS

EMERGENCY PREPAREDNESS POLICY STATEMENT

Document Name: Emergency Preparedness Policy Statement	Document Number: SJP22
Prepared by: Mauricio Carmona	Date of Issue: August 2022
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: No Change

M.J. Dixon Construction Limited (MJD) considers emergency preparedness to be of critical importance and is committed to having an Emergency Response Plan (ERP) in place for each of its workplaces to assist workers and the public to rapidly respond and efficiently recover in the event of an emergency.

MJD will establish, implement, and maintain procedures to:

- Identify potential emergency situations;
- Prevent, as far as reasonably practicable, an emergency situation from occurring;
- Identify necessary resources to implement the prevention procedures, while taking into account the needs of other interested parties, such as emergency services, authorities, or the general public;
- Communicate emergency prevention procedures with all workplace parties and known external interested parties, including specific training for any person with defined duties or responsibilities in relation to the procedures or plans; and,
- Review the procedure at minimum annually and revise as needed.

To minimize losses, especially fatalities and injuries, it is expected that all MJD personnel become familiar with their responsibilities, know the procedures to follow, and be able to communicate effectively in an emergency. MJD will ensure ERPs are known before work begins and be available for reference in an easily identifiable, accessible, and well recorded location. Emergency responses will be practiced and reviewed at least annually with all staff.

Non-compliance of this policy and corresponding procedures will be brought to the attention of the appropriate Supervisor or Manager for further action.



MJ Dixon Construction Ltd. – Vice President

July 2025

Date

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	July 2023	<ul style="list-style-type: none"> • Annual review. No changes made. 	Paul Chiang
Mauricio Carmona	July 2024	<ul style="list-style-type: none"> • Annual review. No changes made. 	Paul Chiang
HSE Dept.	July 2025	<ul style="list-style-type: none"> • Annual review. No changes made. 	Paul Chiang

EMERGENCY PREPAREDNESS PROCEDURE

Document Name: Emergency Preparedness Procedure	Document Number: SJP30
Prepared by: Mauricio Carmona	Date of Issue: August 2021
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: 4

1. Purpose

To provide directions and to identify the resources needed to respond to an emergency on site. The plan may be implemented in whole, or in part, as the situation(s) warrants.

2. Scope

This procedure applies to all M.J. Dixon Construction Limited (MJD) project managers and site superintendents.

3. Definitions

EMERGENCY is generally defined as any event causing loss of life, immediate property loss or an immediate threat to the public or workers.

Specifically, an Emergency can be any of the following incidents as prescribe in Section 11 of the Construction Regulations for the purposes of Section 53 of the Act:

- Any critical injury or death as defined by the Occupational Health & Safety act.
- A worker falling three meters or more.
- A worker who falls and is arrested by a fall arrest system.
- A worker becoming unconscious for any reason. Accidental contact by a worker or by a worker's tool or equipment with a live electrical conductor or live electrical equipment [fuses, switches, disconnects).
- Contact by a backhoe, shovel, crane or similar lifting device or its load with an energized power line rated at more than 750 volts.
- Structural failure of all or part of false work designed by or required by the Act or its regulations to be designed by a professional engineer.
- Structural failure of a principal supporting member, including a column, beam, wall or truss, of a structure. Failure of all or part of the structural supports or a scaffold.
- Structural failure of all or part of an earth or water retaining structure, including failure of the temporary or permanent supports for a shaft, tunnel, caisson, cofferdam or trench.
- Failure of a wall of an excavation or of similar earthwork with respect to which a professional engineer has given a written opinion that the stability of the wall is such that no worker will be endangered by it.
- Overturning or the structural failure of all or part of a crane or similar hoisting device.

Note: Any of the above incidents must be reported to the Ministry of Labour.

4. Roles and Responsibilities

Senior Management:

- Administration and implementation of this procedure.

- Ensure that necessary resources and training are provided.
- Attend emergency drills as it occurs.
- Provide input and feedback to the response plan for the continual improvement of ERPs.

Project Managers/Superintendents:

- Participate in the identification of potential emergency scenarios, as requested.
- Ensure emergency plans are communicated to workers, visitors, and contractors under their area of authority/supervision.
- Report to the Safety Expert or Designate any identified gaps in training to the plan.

Safety Expert or Designate:

- Ensure hazard identification and risk assessments are conducted to identify all potential emergency situations that are linked to hazard assessments, as per the Hazard Identification and Risk Assessment Procedure.
- Ensure that appropriate controls are in place for the identified emergency situations in order to mitigate, prevent and minimize injury or occupational illness.
- Document response plans including roles and responsibilities of relevant workplace parties.
- Identify resources needed to implement the ERP.
- Provide input to response plans from relevant workplace parties.
- Ensure emergency response training is provided appropriate to the employees' role.
- Test ERPs through periodic drills and ensure records of testing and corrective actions are maintained in accordance with MJDs Document and Record Control Policy/Procedure.
- Ensure the workplace meets all First Aid requirements that includes first aid station, facilities, and supplies; qualified first aiders present on site with valid certificates; and provision to transport injured workers to medical facilities.
- Ensure emergency communication systems are in place (i.e., air horns, megaphones, smartphone devices).
- Ensure communication of relevant information is provided to all involved, including workers, visitors, contractors, clients, emergency response services, government authorities and the community regarding emergency response.
- Ensure the status of controls and list of potential emergencies are shared with Senior Management, as part of their annual review.
- Ensure period review of the emergency procedures and response plans at least annually and revise as appropriate.

Facilities Designate:

- Participate in the identification of potential emergency scenarios, as requested.
- Ensure that all necessary emergency equipment is available, in place, well-marked and regularly inspected and maintained, in order to assist with mitigation of potential emergencies.
- Ensure specific forms are utilized for documenting inspections of equipment.

Joint Health & Safety Committee (JHSC):

- Review, at least annually, this procedure, providing any feedback/recommendations to the Safety Expert or Designate and Senior Management, as required.

Workers:

- Report all emergencies.
- Attend training and partake in emergency response drills, as required.
- Follow emergency instructions.
- Provide input and feedback for the continual improvement of ERPs.

5. Procedure

5.1 Hazard Assessment

The Safety Expert will assemble a working group to identify any potential emergency situations. Situations will be identified via hazard and risk assessments, violence risk assessments, incident reporting trends, neighbourhood issues, local environmental conditions, and any other sources that identifies potential emergency situations. Plans will also consider any governmental plans for emergency situations that may affect the way the MJD responds to an emergency. Plans will also consider the incorporation of other emergency plans (i.e., if the building is shared).

All identified situations will be added to the hazard assessment, with identified controls and preventative measures.

5.2 Documented Response Plans

The Safety Expert, in consultation with the JHSC/Health & Safety Representative, will build emergency response plans for all identified potential emergency situations.

Any plans created must include, as a minimum, the following:

- Outlined steps for response to each identified emergency
- Description of emergency alert systems (e.g., alarms, lights, etc.)
- Emergency contact lists (i.e., call trees)
- Maps and/or directions to the nearest medical facility
- Identify staff who will assist with the emergency response, what their roles are, as well as backup staff in case individuals are not available during response
- Specific roles that are required, such as those involved with evacuations, and those responsible for communication with staff, customers, staff emergency contacts, media spokesperson(s), government agencies, and others as required

All input from relevant workplace parties (i.e., Senior Managers, JHSC members, workers, and contractors) will be considered in the Emergency Response Plan to present or minimize occupational illness or injury for the emergency situations identified. Input will be obtained during the Project Site kick-off meeting and a signature of review will be obtained in the last page of the site ERP document.

5.3 Resources

The Safety Expert, in coordination with the Project Manager, Site Supervisors and JHSC/HSR and in special cases, the local fire department will conduct a walk-through of the facility and/or project site to identify the required resources needed to implement the emergency response plans. Emergency equipment must be in place, well-marked and regularly inspected and maintained. This includes at a minimum:

- The appropriate number and type of fire extinguishers that are:
 - Inspected monthly by a competent worker
 - Inspected annually by a certified company; and,
- First Aid requirements that includes:
 - First Aid Station, facilities, and supplies
 - Qualified first aiders
 - Provision to transport workers to a medical facility

Emergency response resources and plans shall be made available via the site health and safety board so that in the event of an emergency, all workplace parties are able to respond in an effective manner.

6. PLAN

EMERGENCY CONTACT NUMBERS

MJ Dixon Construction Limited – Head Office	(905) 270-7770
MJ Dixon Construction Limited – Fax	(905) 270-4244
President	(905) 270-7770 ext.223
Vice President	(905) 270-7770 ext.231
HSE Manager	(905) 270-7770 ext.236
Spill Control Centre	1-800-268-6060
Poison Control Centre	(416) 813-5900
Ministry of Labour	1-877-202-0008
Emergency Services (Police, Ambulance, Fire Dept.)	911

PROJECT LAYOUT AND EMERGENCY RESPONSE INFORMATION

EMERGENCY RESPONSE PLAN DEVELOPMENT

As soon as practical, during the on-site mobilization process, the project superintendent will develop an emergency response plan specific to the site with major access routes identified for emergency vehicles. The site drawing or plan shall contain the following minimum information and be posted in the site trailer and at each First Aid Station. This emergency access plan shall be communicated to all MJ Dixon employees, trade contractors and subcontractors during their site orientation. The Emergency Response Plan shall include the following information:

- Location of entrances and major access routes to site, and assembly point.
- Location of MJ Dixon Construction Limited site office.
- Location of First Aid Stations. Location of Washroom Facilities.
- Location of storage and parking areas. Location of Fire Hydrants.
- Location and type of fire extinguishers and other fire protection equipment.
- Location of Overhead Power Lines. Location and Street names of streets around the site.
- Route and contact information for the nearest hospital.
- Site emergency contact information.
- Emergency warning system and procedures for potential emergencies on site.

The constructor shall review the emergency procedures with the joint health and safety committee or the health and safety representative for the project.

POTENTIAL EMERGENCIES

CRITICAL INJURY OR FATALITY

1. Assess the situation calmly and take command.
2. Protect the accident scene from further hazards, such as fire, live wires, traffic, operating machinery etc.
3. Provide first aid to the injured, if any, as soon as possible and keep the injured party warm
4. Arrange for immediate medical help:

- Call the Ambulance at 911
- Call the Police at 911
- 5. Call the corporate head office to advise senior management so they can immediately contact the Ministry of Labour and notify the injured person(s)' relatives.
- 6. Notify the safety representative/safety committee and local union office (if applicable).
- 7. Have someone meet and direct the ambulance to the accident scene.
- 8. For follow-up purposes, find out which hospital the injured will be taken to and to have someone there.
- 9. Isolate the accident scene by barricades, rope, caution tape, etc. and post a guard to make sure nothing is tampered with until the authorities have arrived on the scene and all investigations are completed.
- 10. Cooperate fully with all emergency response crews and Ministry of Labour Personnel.

NOTE: Once the injured have been effectively looked after and the authorities informed, the site supervisor and his/her assistants should begin their own investigation and obtain witness statements without disturbing the accident scene and the Ministry of Labour's own investigation.

MEDICAL EMERGENCY

- Evaluate the incident area to ensure that it is safe for you.
- Do not move the victim unless greater danger exists.
- The first aider must provide first aid if required.
- Alert supervisor or the nearest trained first aider.
- Contact 911 or provide immediate transportation to medical aid.
- Ensure a report form or investigation form is filled out as required.
- Report to the WSIB or MOL as required.

POWER FAILURE

Evaluate the area to ensure that it is safe. It is important to stay at one location during a power failure. If necessary due to hazards within the building, exit the building and proceed to muster point. One employee will be designated to contact management (if not on-site) to inform them of the power failure. Identify and evaluate the source of the power outage. Contact the utility contractor responsible for the power outage to report the outage.

GAS LEAK

- Evacuate the area to an upwind location.
- Identify and evaluate any injuries.
- If required, contact 911 by sending someone to the nearest phone, or provide immediate transportation to the doctor's office or hospital as required.
- Contact the utility contractor responsible for the equipment causing the leak.

POWERLINE CONTACT

- Stay on the equipment. Never touch the equipment and the ground at the same time. In fact, touching anything that is in contact with the ground can be fatal.
- Keep others away. No one else should touch the equipment or its load-including buckets, outriggers, load lines, and any other part of the machine. Beware of time-delayed relays. Even after breakers are tripped by line damage, relays may be triggered to restore power.

- Break contact. The operator can try to break contact by moving the equipment clear of the wires while remaining inside the machine. However, that may not be possible if the contact has welded a conductor to the equipment.
- Call the local utility. Get someone to call the local electrical utility for help. Stay on the equipment until the utility shuts down the line and confirms that the power is off.
- Report every incident of powerline contact to the utility - they'll check for damage that could cause the line to fail later. Report the contact. If the powerline is rated at 750 volts or more:
 - Report the contact to the inspection department of the Electrical Safety Authority within 48 hours.
 - Provide notice in writing to the Ministry of Labour and to the Joint Health and Safety Committee, health and safety representative, and trade union.
- Since you cannot smell, see, or hear an electric current there is no way for you to determine if fallen power lines are live. Never assume a downed line is safe to touch or to approach. Stay away from them. Tell others to stay away as well. Call 911 to alert emergency crews of the situation.

CHEMICAL SPILL OR RELEASE

1. Ensure no danger to personnel - Evacuate them from the spill scene.
2. Assess the situation and notify the site spills coordinator.
3. The spills coordinator shall notify his senior management.
4. The site spills coordinator shall assess the situation and call the Spills Action Centre and provide notification and any other related information they request.
5. The spills coordinator shall begin organizing the containment and removal of the hazardous spill through the assistance of the local authorities and the Spills Action Centre Duty Officer.
6. The spill action coordinator shall contact and notify the owner of the property.
7. Clean-up efforts shall be dictated by the requirements set out by the Federal, Provincial and / or Municipal authorities. **SPILLS ACTION CENTER EMERGENCY PHONE NUMBER: 1-800-268-6060**

FIRE AND EXPLOSION

If You Detect a Fire:

- Back away - assess the danger.
- Use a fire extinguisher only if safe to do so.
- Alert co-workers to evacuate the area - remain calm.
- Sound an alarm - use pull station, shouts, etc.
- Evacuate buildings by nearest, safe exit close doors as you leave.
- Proceed to the designated staging area for "head count". Advise supervisor / foreman of observations, location of fire, etc.
- Remain at designated "staging area" until further advised.

VEHICLE INCIDENT

During a Collision Resulting in Injury:

- Stay at the scene.
- Call for help or have someone else call (call 911).
- Turn off the engine and turn on flashers.
- If trained in first aid, treat injuries.
- Calmly wait for assistance.

During Vehicle Trouble:

- At the first sign of trouble, begin to pull over.

- Check your mirrors, put on your hazard lights.
- Never stop in the driving lanes.
- Exit vehicle through the door away from traffic.
- Call for help. While you wait for help, stay in your vehicle with the doors locked.

SEVERE WEATHER/NATURAL DISASTER

When severe weather is forecasted:

- Monitor the weather conditions and forecasts.
- Inform your supervisor or Manager before leaving your place.

When severe weather arrives:

If outdoors, find shelter

- During a tornado, hurricane, or high winds, find shelter in a low-lying area such as a ditch or inside a building
- During any other type of severe weather, find shelter at a higher ground elevation, such as a building If indoors or at another facility
- Adhere to the emergency plan of the facility
- Do not travel until the weather has subsided and any alerts have been lifted

Evacuation is required:

- Shut down any equipment
- Follow the Emergency Evacuation Procedure and do not return to the premise until the alert has been lifted.

WORKPLACE VIOLENCE

- Call the police, fire department or paramedics, summon medical attention, secure the location or evacuate the premises.
- There may be little sense in asking the perpetrator to stop, since doing so might just provoke that person even further.
- Wherever possible, it is important to let a harasser or abuser know right away that his or her behavior is unacceptable and that it must stop immediately.
- Follow the emergency response plan developed for the location.

EMERGENCY RESPONSE WARNING SYSTEM AND EQUIPMENT

When an emergency arises, someone must start the emergency response process. This may be an individual on the project or someone in authority. It may be necessary to have a siren, horn or whistle signal to alert individuals that an emergency exists so that appropriate action is taken. In certain situations, MJD supervisory personnel may have to consider the extra emergency equipment which may be required to assist ambulatory response personnel in evacuating the injured from difficult to access areas. Such equipment may consist of:

- Basket stretchers equipped with four-way spreaders for removal from pits.
- Approved rescue containers to raise/lower personnel via crane.

FIRE PROTECTION

Localized or minor fires may be handled by subcontract workers, trained in how to properly use fire extinguishing equipment.

- Fire extinguishers shall be readily available near all open-flame operations, including welding operations, fuel fired equipment, where combustible or flammable liquids are stored, handled, or used, and at each workshop of 300 or fewer square meters of floor area. All subcontractors comply.
- Fire extinguishers are to be marked with their appropriate manufacturer symbols designating its class and use and its WHMIS supplier label. These fire extinguishers are to be routinely inspected monthly and tagged as such, indicating the date of inspection and by whom.
- Classification of dry chemical fire extinguishers

Class A		Class B		Class C
<u>Ordinary flammable</u>		<u>Flammable liquids and Gases</u>		<u>Electrical</u>
Trash	Cloth	Oils	Gasoline	Motors
Wood	Rubber	Oil based paints	Propane	Switch-gears
Paper	Plastics	Acetylene	Gases	Electrical Panels
		Solvents		Electrical Wiring

7. Training

- Employees on site who oversee the first aid station will be required to complete Standard First Aid - CPR-A + AED from a WSIB regulated provider.
- Employees at the office and shop will be trained in the emergency response plan during their orientation.
- Employees on site will be trained in the emergency response plan during their site orientation.
- Workers who may oversee spill response will be required to complete the online Spill Response training through the company's management system software.
- Workers who may be required to use a fire extinguisher will be trained by completing the online Fire Extinguisher training through the company's management system software.
- Emergency training programs and exercises shall be conducted at least annually to ensure the readiness of MJD employees.
- Emergency response training appropriate to the employees' role will also be required.
- The date and time of all drills, as well as the names of participating staff, must be recorded on the Company's Training Record sheet or recorded via the company's management system software and be retained for at least one year after the drill.
- Recommendations and corrective actions resulting from periodic drills or plans, and emergency procedures are to be incorporated into the next edition of this plan.

8. Maintenance of Building Facilities and Fire Protection Equipment

- Fire protection equipment will be checked, inspected, and tested annually by an MJD-approved third party vendor.
- Monthly checks and inspections of all portable fire extinguishers will be conducted by trained and qualified MJD personnel.
- All emergency equipment inspections to be completed on the equipment inspection tag itself.
- Permanent records of all tests and corrective measures taken will be kept for a period of two years after they are made. The records are to be made available upon request to the Chief Fire Official, when required.

9. Plan Review and Evaluation

The Safety Expert will conduct a periodic review of the emergency procedures and response plans at least annually, or earlier if significant changes are required and revise as appropriate.

All MJD projects will have a site-specific plan, recorded utilizing **HSF018 - Site Emergency Response Plan – TEMPLATE**.

Any gaps identified will be recorded in a corrective action plan (CAP) created. Necessary steps will be taken to address the gaps in a timely manner. The CAP will be forwarded to relevant workplace parties for review and comment. It will then be forwarded to Senior Management for review and approval/sign-off.

10. Revisions

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	July 2022	<ul style="list-style-type: none"> Added Section Numbers Added Section 4: Roles and Responsibilities Updated Training requirements Added Sections 6 and 7 <i>*Changes made to reflect COR 2020 requirements</i>	Paul Chiang
Mauricio Carmona	February 2023	<ul style="list-style-type: none"> Added Section 5.1 Hazard Assessment Added Section 5.2 Documented Response Plans Added Section 5.3 Resources Added Section 9 Plan Review and Evaluation <i>*Changes made to reflect COR 2020 external audit review and findings.</i>	Paul Chiang
Mauricio Carmona	February 2024	<ul style="list-style-type: none"> Annual review. No changes made. 	Paul Chiang
HSE Dept.	July 2025	<ul style="list-style-type: none"> Added reference to Site ERP: HSF018 - Site Emergency Response Plan – TEMPLATE in Section 9. 	Paul Chiang

CHAPTER ELEVEN

STATISTICS AND RECORDS

STATISTICS AND RECORDS POLICY STATEMENT

Document Name: Statistics and Records Policy Statement	Document Number: SJP24
Prepared by: Mauricio Carmona	Date of Issue: August 2022
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: No Change


M.J. Dixon Construction Limited (MJD) will collect and review health and safety statistics and records to recognize hazard trends and monitor the success of its Occupational Health and Safety Management System (OHSMS). Analysis of these reports will help identify gaps and trends in the OHSMS and assist in the prevention of incidents, injury, or illness in the workplace.

To maintain accurate statistics and records, all workplace parties are responsible for reporting and addressing all hazards, incidents, near misses and unsafe work conditions immediately.

Senior Management and Supervisors are responsible for the effective documentation and maintenance of all records and reports, and to ensure that appropriate action is taken to respond to trends, repeated contravention, repeated injuries and commonly identified hazards.

It is the policy of MJD to perform weekly, monthly, and annual reviews of all health and safety data collected and communicate results with all relevant workplace parties. Where necessary, continual improvement plans will be amended to address changes to the activities, services, or operating conditions of the Company.

This policy will be reviewed annually, and records of review maintained.



July 2025

MJ Dixon Construction Ltd. – Vice President

Date

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	July 2023	<ul style="list-style-type: none"> Annual review. No changes made. 	Paul Chiang
Mauricio Carmona	July 2024	<ul style="list-style-type: none"> Annual review. No changes made. 	Paul Chiang
HSE Dept.	July 2025	<ul style="list-style-type: none"> Annual review. No changes made. 	Paul Chiang

STATISTICS AND RECORDS

Document Name: Statistics and Records Procedure	Document Number: SJP39
Prepared by: Mauricio Carmona	Date of Issue: August 2021
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: 2

1. Purpose

At M.J. Dixon Construction Limited (MJD), there is an utmost importance on the health, safety and well-being of employees and others who may be affected. Protecting employees from injury and other work-related health issues is an ongoing objective of the company. This procedure provides guidelines on organizing, monitoring, and measuring health and safety performance in order to prevent accidents and injuries.

2. Scope

This procedure applies to all superintendents, management and the Joint Health and Safety Committee (JHSC) at MJD.

3. Definitions

Lagging Indicators - Reactive in nature. They measure the effectiveness of a safety program after the facts. Examples are Lost Time, Medical Aid, and First Aid claims.

Leading Indicators - A measure preceding or indicating a future event used to drive and measure activities carried out to prevent and control injuries. Examples included the number of completed safety meetings, number of housekeeping inspections, closure rates of outstanding inspection items etc.

Statistic: A fact or piece of data from a study of a large quantity of numerical data.

Trends - A general direction in which something is developing or changing. If the item shows multiple times, it may signify a trend.

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

4. Roles and Responsibilities

Senior Management:

- Respond to the JHSC recommendations within 21 days in writing.
- Measure and review the Occupational Health and Safety (OHS) performance at a specified frequency, at minimum annually, (as submitted by JHSC).
- Ensure comparison of current health and safety performance with past performance.
- Review the audit submitted by the auditor. Develop an action plan, appoint individuals to implement corrective actions and communicate the results to relevant workplace parties.
- Ensure specified forms and/or software are utilized (Note: All summary results will be recorded and maintained appropriately).

Supervisors:

- Document all accidents, incidents, first aid occurrences, lost time injuries, equipment damage, MOL reports and JHSC minutes.
- Ensure qualitative and quantitative measurements appropriate to the organization are recorded.
- Ensure leading and lagging performance indicators are recorded.
- Provide the monthly reports to the JHSC.

Workers:

- Report all accidents, incidents, first aid occurrences, lost time injuries and equipment damage to your supervisor.

Joint Health and Safety Committee (JHSC):

- Review monthly reports for analysis of statistics and identification of trends.
- Ensure analysis of first aid treatment records.
- Prepare annual reports, with recommendations, and submit to Senior Management with recommendations.

Internal Auditor:

- Conduct the audit and submit the report to Senior Management.

5. Procedure**I. WEEKLY STATISTICS (Project Review)**

Weekly statistics will be reviewed for all sites, during company-wide weekly safety meeting/call.

II. MONTHLY STATISTICS (Project Review)

The company's management system software will generate monthly statistics based on the submitted Weekly Safety Reports/ Forms, including but not limited to: Inspection forms HFS001-HSF010; and incident/hazard forms HSF020-025.

The JHSC will review the statistics monthly and provide recommendations to Senior Management if required.

Health and safety performance measures will include both qualitative and quantitative components appropriate to the organization, for example:

- Number of inspections, JHSC meetings, trainings, tailgates, or toolbox talks completed
- Quality or completeness of reports and corrective actions
- Number of MOL orders or WSIB claims
- Frequency, trends and types of injuries recorded

Both leading and lagging performance indicators will also be used to assess the effectiveness of the Occupational Health and Safety Management System (OHSMS).

Leading indicators may include, but not limited to:

- Toolbox talks
- Orientation and training records
- Workplace inspections
- Hazard reports
- JHSC meeting minutes
- Client site inspections
- Total health and safety action items completed (i.e., from meetings, inspections, and investigations)

Lagging indicators may include, but not limited to:

- First aid treatments
- Injury/illness reports/investigations
- Lost-time injuries
- Equipment/property damage
- Near Misses
- MOL orders
- NCRs

III. ANNUAL STATISTICS

The Safety Expert will collect health and safety data required to develop the annual health and safety trends analysis report. Analysis of statistics and identification of trends that will be tracked and assessed include:

- Injury/illness reports/investigations
- Workplace inspection reports
- Hazard report
- JHSC meeting minutes
- WSIB injury/illness reports and insurance claims
- Medical aid and first aid treatment records
- Critical injury reports
- Lost time/Non-lost time reports
- Near misses
- Equipment/Property Damage

The Safety Expert or Designate will work with the designated JHSC member to review the data and develop the trends analysis report for Senior Management review.

Senior Management will review the trends analysis report in a timely manner and reply in writing to the JHSC regarding action plans and corrective actions to be taken/implemented.

The Safety Expert or Designate will monitor the corrective action process and report on a regular basis the status of the completed items.

IV. TRENDS ANALYSIS REVIEW

Senior Management will compare current health and safety performance with past performance (at least 3 years of health and safety statistics) and prepare a **Trends Analysis** report, which will be reviewed in the following Management meeting. Based on the review, any required corrective actions will be determined.

All trends reviewed will be recorded via meeting minutes, filed within the company's software management system, and copy provided and communicated to relevant workplace parties in a timely manner (i.e., Supervisors, workers, JHSC, etc.). They will also be posted to the Health and Safety Board and communicated through the company's management system software for review and acknowledgement by all workers.

Senior Management will consider the trends review when reviewing and revising health and safety objectives and the continual improvement process plans at least annually.

V. ANNUAL AUDIT

The internal auditor will conduct an audit of MJD health and safety program on a yearly basis. The audit will be presented to Senior Management each year. Annual audit reports must be retained for 3 years.

VI. ACTION PLAN

Senior Management will review the internal auditor's report, annual statistics submitted by the JHSC, and the trends analysis review and develop an action plan. The action plan will be posted on the health and safety board at the office. Senior Management will appoint appropriate individuals to take actions based on the action plan. Workers will be informed of the actions taken.

6. Revisions

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	July 2022	<ul style="list-style-type: none"> Added Section Numbers Added Section 3: Definitions Moved up and updated Section 4: Roles and Responsibilities Added Sections 6: Revisions <i>*Changes made to reflect COR 2020 requirements</i>	Paul Chiang
Mauricio Carmona	February 2023	<ul style="list-style-type: none"> Updated Section 5 II Monthly Statistics Updated Section 5 III Annual Statistics Updated 5 IV Trends Analysis Review <i>*Changes made to reflect COR 2020 external audit review and findings.</i>	Paul Chiang
Mauricio Carmona	February 2024	<ul style="list-style-type: none"> Annual review. No changes made. 	Paul Chiang
HSE Dept.	July 2025	<ul style="list-style-type: none"> Annual review. No changes made. 	Paul Chiang

CHAPTER TWELVE

LEGISLATION AND OTHER REQUIREMENTS

LEGISLATION AND OTHER REQUIREMENTS POLICY STATEMENT

Document Name: Legislation and Other Requirements Policy Statement	Document Number: SJP23
Prepared by: Mauricio Carmona	Date of Issue: August 2022
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: No Change

M.J. Dixon Construction Limited (MJD) is committed to operate in compliance with the Occupational Health & Safety Act (OHSA), the Construction Projects Regulations (O. Reg. 213/91) and other requirements such as standards, codes, guidelines, and manufacturer specifications to ensure compliance in the workplace.

As an employer, MJD will take every precaution reasonable in the circumstances for the protection of its workers. This includes ensuring that all workers and Supervisors receive education and training on their rights and responsibilities under the OHSA, and how to exercise them.

MJD has developed its own set of rules, policies and standards that are to be respected and that workplace parties must adhere to, including but not limited to: the use of personal protective equipment (PPE), Working at Heights, Company Rules, and Workplace Violence and Harassment. MJDs Senior Management, Supervisors and the Health and Safety Department will enforce these rules and regulations, and disciplinary measures will be taken if necessary. To encourage compliance, copies of the OHSA “green book” are made available at every job site and within MJDs Head Office.

MJDs will evaluate the Company’s overall compliance with applicable legislation as per the procedure.

This policy will be reviewed annually.



MJ Dixon Construction Ltd. – Vice President

July 2025

Date

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	July 2023	● Annual review. No changes made.	Paul Chiang
Mauricio Carmona	July 2024	● Annual review. No changes made.	Paul Chiang
HSE Dept	July 2025	● Annual review. No changes made.	Paul Chiang

LEGISLATION AND OTHER REQUIREMENTS PROCEDURE

Document Name: Legislation and Other Requirements Procedure	Document Number: SJP40
Prepared by: Mauricio Carmona	Date of Issue: August 2021
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: 3

1. Purpose

The purpose of this procedure is to identify all applicable health and safety legislation and ensure compliance within M.J. Dixon Construction Limited (MJD).

2. Scope

The following procedure applies to all MJD employees and workplaces.

3. Definitions

Other Requirements - Requirements of provision MJD subscribes, however not legally binding, such as industry standards.

4. Roles and Responsibilities

Senior Management:

- Ensure health and safety legislation (all acts and regulations that apply) are considered during the job/task planning process.
- Ensure a list of applicable legislation is created and readily available to each MJD workplace, as required.
- Ensure workers and Supervisors receive education and training on their legislated, health and safety roles, rights and responsibilities.
- Ensure legislated posting requirements are met.

Supervisors:

- Attend any health and safety education, training or competency course provided by MJD.
- Ensure they are fully knowledgeable of work-related hazards to which their employees are exposed and controls to protect them from these hazards.
- Make ongoing efforts to familiarize themselves with applicable legislative health and safety requirements.
- Ensure legislative compliance within their area of responsibility.

Safety Expert or Designate:

- Identify and compile a list of applicable legislation, regulations, standards, and any other requirements that apply to the Company.
- Identify methods to ensure compliance with applicable legislation.
- Ensure all documentation related to legislation, regulations standards and any other requirements are up to date.
- Ensure visible posting or availability of relevant legislation at each workplace, as required.
- Evaluate compliance to legislation at regularly planned intervals and retention of records of evaluation.

- Ensure specific forms for evaluation are utilized.

Workers:

- Attend any health and safety education and training courses provided by MJD.
- Work in accordance with the Occupational Health and Safety Act (OHSA) and regulations.
- Report any workplace hazard, injury or illness to the Supervisor immediately.

5. Procedure

5.1 List of Legislation and Other Requirements

- The Safety Expert or Designate will identify and compile a list of applicable legislation, regulations, standards, and any other requirements, and ensure any related documents are up to date by regular review and observation.
- The list of applicable legislation and other requirements shall be reviewed and evaluated for compliance at regularly planned intervals (at least annually), and records of review and evaluation maintained in meeting minutes or corrective action plans.

5.2 Health and Safety Posting Requirements

The Safety Expert or Designate shall ensure that copies of relevant legislation are posted in the workplace, readily available to workers and current.

POSTING REQUIREMENTS

1. Notice of Project
2. MJ Dixon Construction Limited Health and Safety Policy Statement
3. MJ Dixon Construction Limited Workplace Violence Policy Statement
4. MJ Dixon Construction Limited Environmental Policy Statement
5. Company Rules
6. Employment Standards in Ontario poster
7. Emergency Response Procedure
8. Emergency contact numbers
9. Route & map to the nearest hospital
10. Name of first aider on the project (and first aid certificate)
11. WSIB poster 82 ("In the case of injury poster")
12. Name of H & S Representative
13. Names of JHSC members (where a committee is established)
14. JHSC minutes of the meeting (where a committee is established)
15. MOL reports/orders
16. Location of the toilets
17. Copy of up-to-date OHSA & Regulations for Construction Projects (most current edition)
18. Prevention Starts Here – Workers right to know (MOL) poster

AVAILABLE FOR REVIEW

1. SDS for controlled products used on the project
2. Designated substance survey - report (where applicable)
3. Traffic Control Plan (where applicable)
4. Shoring/bracing sign - off sheet prior to placement of concrete for multi-story structures

5. Confined Space Entry and Rescue Plan
6. Locates
7. Fall Arrest Rescue Plan
8. Concrete pad drawings for Tower Crane (where Tower Crane in use)
9. Demolition Plan
10. Copy of up-to-date MJD

AVAILABLE ON THE PROJECT

1. First aid kit adequate for number of workers (see First aid regulation 1101)
2. Adequate supply of drinking water with individual drinking cups
3. Adequate number of portable toilets (1 per every 10 to 15 workers) – in the wintertime heated toilets required
4. Adequate number of fire extinguishers and location signs (see s. 52 of Construction Reg. 213/91.)
5. Emergency air horns
6. Stretcher
7. Blanket
8. Portable Eye Wash Station
9. Minimum one air horn for emergency situations

SUBCONTRACTOR DOCUMENTATION

From Subcontractors, obtain & keep on the project copies of:

1. Registration forms (WSIB forms T – 1000)
2. WSIB Clearance certificates
3. Liability Insurance
4. Proof of required OH & S training and/or trade certification under TQAA
5. Weekly toolbox safety talks
6. Any specific safe work procedures such as: demolition, confined space entry, fall arrest rescue procedures, fall prevention plan, hot work, electrical work, crane operations, public safety etc.

Note: weekly safety talks shall be held and documented as a minimum standard on the project

SAFETY SIGNAGE

Site Safety Signs: adequate number of communication signs shall be made available to project supervisors such as:

- Evacuation Assembly Area
- Danger Due To / Restricted Access
- PPE required
- GATE #s
- Construction Office etc.
- Overhead power lines – identify voltages and safe approach distances

5.3 Legislated Training Requirements

- All MJD workers shall be trained on their legislative roles, rights, and responsibilities. Mandatory legislative training includes:
 - Accessibility for Ontarians with Disabilities Act (AODA)
 - Workplace Hazardous Materials Information System (WHMIS)
 - Worker/Supervisor Health and Safety Awareness (provided by the MOL)
 - Workplace Violence and Harassment (recognizing workplace violence, safety procedures and prevention)
- Records of training completed by workers and Supervisors shall be maintained with the Safety Expert or retained via the Company's management system software.

5.4 Other Training Requirements

MJD may have additional training requirements for workers and Supervisors depending on the nature of work, including Working at Heights, Joint Health and Safety Committees and First Aid.

5.5 Evaluating Compliance

- The Safety Expert or Designate in coordination with Supervisors and members of the JHSC shall evaluate compliance to applicable legislation annually by use of following methods:
 - Staying current with changing laws and regulations and updating processes and practices based on new laws and industry best practices
 - Ensuring employees follow policies and procedures through regular communication, education, and training
 - Ensuring employees understand the “why” or reasoning behind changing policies, procedures, and rules
 - Scheduling regular, internal compliance audits to ensure procedures and processes are current and compliant. Audits will be both announced and unannounced at quarterly intervals.

Evaluations in the form of a gap analysis will identify future or immediate changes required. Records of evaluation will be made through use of Hazard or Workplace Inspection Forms, Meeting Minutes, etc. on MJDs management system software, and updates and changes made accordingly. Records of evaluation shall be kept with the Safety Expert or Designate on the computer network for a minimum of 10 years.

6.Revisions

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	July 2022	<ul style="list-style-type: none"> ● Added Section Numbers ● Added Section 3: Definitions ● Added Section 4: Roles and Responsibilities ● Updated Section 5: Procedure to include training and evaluation ● Added Sections 6: Revisions <i>*Changes made to reflect COR 2020 requirements</i>	Paul Chiang
Mauricio Carmona	July 2023	<ul style="list-style-type: none"> ● Updated 5.5 Evaluating Compliance 	Paul Chiang
Mauricio Carmona	July 2024	<ul style="list-style-type: none"> ● Annual review. No changes made. 	Paul Chiang
HSE Dept.	July 2024	<ul style="list-style-type: none"> ● Annual review. No changes made. 	Paul Chiang

FIRST AID PROCEDURE

Document Name: First Aid Procedure	Document Number: SJP72
Prepared by: Mauricio Carmona	Date of Issue: August 2022
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: No Change

Purpose: The purpose of this procedure is to ensure that all MJ Dixon Construction Limited locations are in compliance with the First Aid Regulation 1101.

Scope: This procedure applies to all MJ Dixon Construction Limited employees.

Definitions

- **First Aid** - the one-time treatment or care of an injury. First aid includes, but is not limited to:
 - Cleaning minor cuts, scrapes
 - Treating minor burns
 - Applying bandages/dressings
 - Applying cold compress, cold pack, or ice bag
 - Applying a splint
 - Changing a bandage or a dressing after a follow-up observation visit
- First aid includes treating any illness or injury as taught by the first aid delivery organization.
- If applicable, first aid also consists of calling Emergency Medical Services (EMS), beginning Cardio Pulmonary Resuscitation (CPR), and using an Automatic External Defibrillator (AED) if available.

First Aid Supply Requirements

- All locations must have a first aid station;
- First aid stations must be positioned in a conspicuous location and accessible to everyone;
- The following list are the required materials for a First Aid Station:

No. of Workers	First Aid Station Requirements	First Aid Kit/Box Requirements
1 to 5 People	<ul style="list-style-type: none"> ● Current edition of the St. John's Ambulance First Aid Manual and Log; ● Current edition of Reg.1101; ● One eye wash Station ● 1 'In Case of Injury' poster; ● Incident/Accident Investigation Report Form ● First Aid Station Inspection Form 	<ul style="list-style-type: none"> ● 1 card of safety pins; ● 12 adhesive dressings individually wrapped; ● 4 sterile gauze pads, 3 inches wide; ● 2 rolls of gauze bandage, 2 inches wide ● 2 field dressings, 4 inches square or 2 four-inch sterile bandage compresses; ● 1 triangular bandage
6 to 15 People	<ul style="list-style-type: none"> ● Current edition of the St. John's Ambulance First Aid Manual and Log; ● Current edition of Reg.1101; ● One eye wash Station ● 1 'In Case of Injury' poster; 	<ul style="list-style-type: none"> ● 1 card of safety pins; ● 24 adhesive dressings individually wrapped; ● 12 sterile gauze pads, 3 inches wide; ● 4 rolls of 2-inch gauze bandage;

	<ul style="list-style-type: none"> • Incident/Accident • Investigation Report Form • First Aid Station Inspection Form 	<ul style="list-style-type: none"> • 4 rolls pf 4-inch gauze bandage; • 4 sterile surgical pads suitable for pressure dressings, individually wrapped; • 6 triangular bandages; • 2 rolls of splint padding; • 1 roll-up splint;
16 to 200 People	<ul style="list-style-type: none"> • Current edition of the St. John's Ambulance First Aid Manual and Log; • Current edition of Reg.1101; • One eye wash Station • 1 'In Case of Injury' poster; • Incident/Accident Investigation Report Form • First Aid Station Inspection Form • 1 Stretcher • Two Blankets 	<ul style="list-style-type: none"> • 24 card of safety pins; • 1 basin, preferably stainless steel; • 48 adhesive dressings individually wrapped; • 2 rolls of adhesive tape, 1 inch wide; • 48 sterile gauze pads, 3 inches wide; • 8 rolls of 2-inch gauze bandage; • 8 rolls of 4-inch gauze bandage; • 6 sterile surgical pads suitable for pressure dressings, individually wrapped; • 12 triangular bandages; • 2 rolls of splint padding • Splints of assorted sizes;

(Reference First-aid Regulation 1101, s. 1-12)

FIRST AID TREATMENT RECORDS

Whenever first aid is administered on the work site, a record must be made in the First Aid Record Book. The record must indicate the name of the worker, the nature of the injury, date/time of occurrence, date/time injury was reported, date/time of treatment, nature of treatment rendered and the name of the person rendering the treatment. This is a confidential document and must be treated as such. Once the record book has been filled, or the project completed, the record must be forwarded to MJ Dixon Construction Limited office for filing. By law it must remain filed of one year.

(Reference First-aid Regulation 1101, s. 5)

FIRST AID CERTIFICATION

It is MJ Dixon Construction Limited policy that each project superintendent or his competent replacement possesses first aid training and certification. Where the project superintendent or his competent replacement does not possess this certification or where the certification has expired, the Project superintendent or his competent replacement shall be responsible to ensure that one or more qualified first aid attendants (workers) are employed at the work site. Unless otherwise instructed, *each subcontractor company* shall provide their own first aid equipment and trained first aid attendants (workers) as per the WSIB First Aid Regulations, which require all employers to provide first aid coverage.

QUARTERLY INSPECTION OF FIRST AID KITS

- On site, first aid kits will be inspected on a quarterly basis by the designated first aid attendants for the work area.
- In the office the first aid kits will be inspected by the JHSC during their workplace inspection.
- The inspector will examine the first aid kit in their work area and document the results of their inspection.
- Any deficiencies or missing items will be supplied by management.
- The first aid attendant will provide the date of the inspection and their signature.

- (Reference First-aid Regulation 1101, s. 6)

RESPONSIBILITIES

WORKERS

In All Cases of Injury/Disease

1. Get first aid immediately.
2. Tell your supervisor or manager of any injury or the possible onset of a work- related disease/condition.
3. Claim benefits if the injury causes him or her to seek health care. Health care includes services requiring the professional skills of a health care practitioner (i.e., a doctor, nurse, chiropractor or physiotherapist); services provided at hospitals and health facilities and prescription drugs.
The worker should also claim benefits if the injury causes him or her to:
 - Be absent from regular work
 - Require modified duties at less than regular pay
 - Require modified work at regular pay for more than seven calendar days after the date of accident
 - Earn less than regular pay at regular work.
4. Claim WSIB benefits by:
Signing WSIB Form 6, Worker's Report of Injury/Disease and giving a copy of the form to the Management
5. Choose a doctor or other qualified health professional. Do not change health professionals without permission from the WSIB.
6. Cooperate in health care treatment.
7. Consent to disclose their Functional Abilities information by signing the:
 - WSIB Form 6, Worker's Report of Injury/Disease
 - Functional Abilities Form for Planning Early and Safe Return to Work (FAF), or
 - REO6 - Worker's Continuity Report (REO6) (if applicable)
 - Cooperate in the work reintegration process.
 - Complete and return all WSIB forms promptly.
 - Report to the WSIB any material change (i.e., change in income, return to work status, or medical condition).

SUPERVISORS

- Ensure that a First Aid Station is setup (all job sites must complete this step upon project start up).
- Ensure that the First Aid Station is stocked as per the legislated requirements.
- Appoint someone who is trained in First Aid and holds a valid certification of training to be responsible for maintaining and completing a quarterly inspection of the First Aid Station.

In All Cases of Injury/Disease

1. Make sure first aid is given immediately.
 - (First aid includes but is not limited to: cleaning minor cuts, scrapes or scratches; treating a minor burn, applying bandages and/or dressings, cold compress, cold pack, ice bag, splint, changing a bandage or a dressing after a follow-up observation visit and any follow-up for observation purposes only)
2. Make sure there is a record of the first aid treatment/advice given to the worker.
3. Provide immediate transportation to a hospital, a doctor's office, or the worker's home, if necessary.

FIRST AID ATTENDANT

In All Cases of Injury/Disease

- Provide first aid immediately as required.
- Fill out the First Aid Log when first aid treatment is given to any worker.

MANAGEMENT

- Review first aid treatment records annually.

In All Cases of Injury/Disease

1. Complete WSIB Form 7, Employer's Report of Injury/Disease, if the worker gets health care. Health care includes services requiring the professional skills of a health care practitioner (i.e., a doctor,

nurse, chiropractor or physiotherapist); services provided at hospitals and health facilities and prescription drugs.

Must also complete WSIB Form 7, Employer's Report of Injury/Disease if the injury causes the worker to:

- Be absent from regular work
 - Require modified duties at less than regular pay
 - Require modified work at regular pay for more than seven calendar days after the date of accident
 - Earn less than regular pay at regular work.
2. Return the completed Form 7 to the WSIB within three calendar days of learning of their reporting obligation. If the worker is unable or unwilling to sign the Form 7, send the form in without the signature.
 3. Give the worker a copy of the accident report (including any attachments to the Form 7) which is provided to the WSIB.
 4. Pay full wages and benefits for the day or shift on which the injury occurred.
 5. Supply a Functional Abilities Form 2647 to the health professional treating the worker. Ensure that the worker's signed consent to the release of the functional abilities information is attached. This signed consent will either be on the Form 2647 or the employer's copy of the Form 6.
 6. Cooperate in the work reintegration process.

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	July 2023	<i>Annual Review. No Changes.</i>	Paul Chiang
Mauricio Carmona	July 2024	<i>Annual Review. No Changes.</i>	Paul Chiang
Senior Management	September 2024	<i>No changes required.</i>	Paul Chiang
HSE Dept.	July 2025	<i>Annual review. No changes made.</i>	Paul Chiang

JOINT HEALTH AND SAFETY COMMITTEE TERMS OF REFERENCE

Document Name: JHSC Terms of Reference	Document Number: SJP73
Prepared by: Mauricio Carmona	Date of Issue: August 2022
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: 1

PURPOSE

This Terms of Reference provides the basic guidelines necessary to have an effective Joint Health and Safety Committee (JHSC). The Occupational Health and Safety Act is built upon the principle that workers and employer work together to ensure that the working environment is safe and that provincial standards are met. This is achieved with the assistance of the Joint Health and Safety Committee member representatives.

The terms of reference define the purpose, role, powers, and responsibilities of the committee and ensure that the joint health and safety committee is functioning with a clear mandate to implement the principle of shared responsibilities of management and workers.

SCOPE

This Terms of Reference applies to all Joint Health and Safety Committees established at MJ Dixon Construction Limited.

PURPOSE AND MISSION OF THE JHSC

The primary purpose and mission of the JHSC is to monitor, assist and support the Internal Responsibility System (IRS). This is best accomplished when the JHSC fulfills its essential role of identifying weaknesses in the company's IRS and recommends solutions that enable all parties to understand accept and carry out their individual and collective responsibilities for health and safety. The JHSC will endeavor to make recommendations that establish, implement, monitor, evaluate and improve company policies, programs and procedures. An effective JHSC ensures that any weaknesses in the company's chain of internal responsibility are identified and that attention remains focused on these weaknesses until they are addressed and resolved.

The JHSC shall ensure that all health and safety concerns are brought forward and revisited until they have been resolved. The JHSC which will meet on a quarterly basis to discuss issues including, but not limited to:

- First aid records
- Accident investigation reports
- Hazard reports
- Monthly inspection reports
- Review minutes of prior JHSC meeting
- Review training records
- Health and Safety disciplinary actions
- Ministry of Labour (MOL) orders (if any)

SELECTION OF JHSC MEMBERS AND CO-CHAIRS

Worker representatives on the JHSC are to be selected by the workers who do not exercise managerial functions. The employer shall select the remaining members of a committee from persons who exercise managerial functions for the employer. Two members of the committee will co-chair the committee, one of

whom will be selected by the members who represent workers and the other of whom will be selected by the members who exercise managerial function.
(Ref: s. 9 (8); s. 9 (11))

COMPOSITION OF THE JHSC

MJ Dixon Construction Limited will have a committee with at least one management member and one worker member, to include representatives from office and site.
(Ref: s. 9 (6))

Project Requirement

Project Duration	Workforce	Minimum Requirements
Any	6-19	Worker representative elected (by workers)
3 months or more	20-49	Joint health and safety committee (JHSC) with one worker representative elected (by workers) or selected (by union). One management member appointed by plant management.
3 months or more	50+	JHSC with at least two workers elected (by workers) or selected (by union). At least two management members appointed by management. One management and one worker member must be certified by the Ministry of Labour.

In addition to the above, a JHSC will be formed based on Minister order.

The JHSC shall consist of a minimum of two certified members; one member who does not exercise managerial functions and one member who exercises managerial functions. The term of the serving certified member will be a minimum of two years. Alternatives may be allowed; however, they shall only be used in emergency conditions and with the approval of the co-chairs. Each party will supply a list of 1 alternative. (Ref: R.S.O. 1990, c. O.1, s. 9 (12))

The JHSC shall meet quarterly at a specific date and time, which will be decided by the JHSC. Members may meet remotely or virtually so long as worker representatives or JHSC members have access to all pertinent information required.

(Ref: s. 9 (33))

A co-chair may, with the consent of his/her counterpart, invite any additional person(s) to attend the meeting to provide additional information and comments. However, this individual(s) shall not participate in the regular business of the meeting unless asked to do so.

If a certified member resigns steps shall be taken to ensure that the requirement for a certified member is met.

The certified member may bilaterally order the company to Stop Work if they agree that the work being performed is dangerous as defined in the Occupational Health and Safety Act. Section 44 (1).

Committee information (e.g., names and work locations of JHSC members or HSR) shall be posted in a conspicuous place in the workplace (Health and Safety Board) or in a readily accessible electronic format.

Within forty-eight hours after a health and safety representative or joint health and safety committee members are selected for a project, a constructor shall add to the notice the name, trade and employer of the health and safety representative or of each of the committee members

FUNCTIONS OF THE JHSC

In accordance with the Occupational Health and Safety Act the JHSC functions are as follows:

- To conduct meetings according to an established schedule.
- To conduct monthly workplace inspections.
- To receive and review all incident, inspection and health and safety audit reports and to make recommendations as necessary.
- To receive and review all health and safety-related test results and to make recommendations as necessary.
- To operate on the principle of consensus-building when reaching decisions.
- To make written recommendations to the employer as necessary.
- To have members accompany Safety Association representatives or MOL/Health and Safety Inspectors as required.
- To investigate incidents, injuries or occupational illnesses as required.
- To report findings of investigations to the MOL and management as required.
- To assist and promote the development of company health and safety policies, programs, procedures and best practices.
- To obtain information from the employer regarding potential or actual workplace hazards.
- To obtain information from the employer regarding statistics, trends, records, processes or any other information that may help it to fulfill its mandate.
- To always work in compliance with legislation, company health and safety policies, programs, procedures and industry best practices.
- To assist in hazard assessment of new or modified facilities, processes, procedures, equipment, devices and materials.
- To monitor the effectiveness of the Internal Responsibility System and its own effectiveness on an ongoing basis through various auditing programs.
- To encourage adequate education and training programs in order that all employees are knowledgeable in their rights, restrictions, responsibilities, and duties under the Occupational Health and Safety Act.
- To evaluate all newly introduced potential hazards (i.e. machinery and/or chemicals) and communicate the hazard potentials to respective Management, prior to their use.
- To develop and implement with Management, training programs for all newly introduced hazards and participating in the development and delivery of health and safety training programs.
- To be present during an occupational hygiene testing if required at the workplace.
- To advise the selection of the personal protective equipment.
- To address matters related to Designated Substances Regulations and WHMIS, where applicable.
- To address any workplace harassment incident, if it is brought to the committee.
- To review these terms of reference at least annually or sooner if required.
- To carry out any other duties and functions as prescribed by the legislation.

(Ref: s. 9 (18), (19))

QUORUM

Both co-chairs should be present at every meeting and the management representatives must be not more than worker members.

HEALTH AND SAFETY MEETINGS

JHSC meetings are to be held at least quarterly at a specific date and time, which will be decided as a committee. Committees may meet remotely or virtually so long as worker representatives or JHSC members have access to all pertinent information required. Although the changes to the Act allow JHSC meetings to take place virtually, it is very much preferred and encouraged that all workplace parties continue to attend JHSC meetings in person.

Records of the recent meeting must be posted on the health and safety board.

Meetings shall consist of a number of issues, including the analysis of: first aid records, accident investigation reports, hazard/near miss reports, and the hazards identified on the JHSC tour. In addition, meetings may include the review of: minutes to the last JHSC meeting, applicable training records, hygiene surveys, safety/safety talk meeting minutes, health or safety related disciplinary action, repeat items, as well as any other items that may arise.

(Ref: s. 9 (33))

MINUTES OF MEETINGS

The committee will designate a secretary for the meeting to take minutes and be responsible for having the minutes typed, filed and circulated within 5 working days of the meeting, or as the committee may from time to time instruct. Minutes of the meetings will be reviewed and edited, where necessary, by the co-chairs. They will then be signed and circulated to all committee members. Agenda items, meeting minutes, inspection reports and recommendations will be kept in the terms of reference binder for a year. (Ref: s. 9 (22))

PAYMENT OF ATTENDING MEETINGS

All time spent in attendance at committee meetings or in activities relating to the function of the committee will be paid for at the members' current rate of pay for performing work, and the time spent shall be considered as time at work. (Ref: s. 9 (35-37))

MEETING AGENDA

The co-chair will prepare an agenda and will forward a copy to all committee members prior to the meeting. The committee may accept any item as proper for discussion and resolution pertaining to health and safety. All items raised from the agenda in meetings will be dealt with on the basis of consensus rather than voting. Formal motions will not be used. All items will be reported in the minutes. Unresolved items will be recorded and placed on the agenda for the next meeting.

WORKPLACE INSPECTIONS

The JHSC will inspect the workplace once a month. Each inspection must be done by minimum of one worker and management member. (Ref: s. 9 (23-29))

FURTHER REQUIRED TRAINING FOR ALL JHSC MEMBERS

In addition to the legislated requirement that at least one worker member and one management member of the JHSC receive certification training, all JHSC members are required to take the following training that pertains to their legislated responsibilities:

- Accident Investigation
- Workplace Inspection
- Emergency Response
- Occupational Health and Safety Responsibilities
- Hazard Analysis

CONFIDENTIALITY OF INFORMATION

JHSC members are required by the Occupational Health and Safety Act to keep confidential any personal medical details or other sensitive information they receive. This means paying strict attention to the security of committee records. In order for the committee to function properly, all parties must be confident and trust that no improper use will be made of the information received.

RESPONDING TO UNSAFE CONDITIONS OR PRACTICES

One of the most important legislated functions of the JHSC is to develop recommendations to control hazards or address safety concerns at the workplace. Certified members of the JHSC have the authority to investigate and act upon dangerous circumstances that require immediate attention. Individual committee members may identify hazards during monthly inspections, incident investigations or through daily worker contacts. However, because committee members are workers under the legislation, they first have a legal duty to report any hazards or contravention they become aware of to their Supervisor.

ACCIDENT INVESTIGATION

All accidents, injuries and incidents will be reviewed and discussed by the committee during the regular monthly meeting to explore if anything can be done to prevent any similar occurrences in the future. In the event of a critical injury, one of the designated members of the committee along with a member of Senior Management shall investigate the accident. Refer to the Investigation and Reporting Procedure for further details. (Ref: s. 9 (31))

ACCOMPANIMENT

The committee will designate certified worker members to accompany a Ministry of Labour inspector while carrying out a Ministry inspection of the workplace. (Ref: s. 9 (29))

WORK REFUSALS

In the event of a work refusal, the designated certified worker member will investigate if possible. Please refer to the Work Refusal Procedure for further details. (Ref: s. 43 (4)(a); s. 45)

FORMAL WRITTEN RECOMMENDATIONS

The JHSC will be required to submit formal written recommendations to control hazards at the workplace.

Recommendations can be based on the following:

- Workplace Inspections
- Observations
- Discussions
- Review of training programs
- Worker request or concerns

In developing recommendations, the committee must meet the following criteria:

1. Define the hazard
2. Collect all necessary information
 - Description of the process and workplace layout.
 - History/details of previous accident and investigations.
 - Comments and suggestions from supervisors and workers in the area concerned.
 - Maintenance schedules and manufacturers specifications.
3. Consider possible solutions, taking into account:
 - The actual and potential seriousness of the problem.
 - The range of possible solutions.
 - The practicality of the solution being recommended.

In submitting recommendations, the recommendation must meet the following criteria;

1. Submitted by either Co-Chair of the committee upon final agreement by the committee.
2. Submitted to Senior Management.
3. Submitted within one week of the JHSC meeting at which the recommendation was decided upon.

Senior Management must communicate in writing directly to the co-chairs within **21 days** regarding recommendations of the committee included in the minutes by giving its assessment of the problem and outlining who is responsible for resolving the matter, along with a timeframe in which the matter will be resolved.

(Ref: s. 9 (20-21))

GENERAL

All workers will be encouraged to discuss their problems with their supervisor before bringing it to the attention of the committee.

- (a) Committee members will thoroughly investigate all complaints to get all the facts and will exchange these facts when searching for a resolution of the problem. All problem resolutions will be reported in the minutes.
- (b) Medical or trade secret information will be kept confidential by all committee members.

AMENDMENTS TO THESE GUIDELINES

Any amendments, deletions or additions to these guidelines must have the consensus of the total committee and shall be set out in writing and attached as an appendix to these guidelines.

RESPONSIBILITIES

MANAGEMENT

- Providing assistance and co-operation where necessary to the committee to carry out its role.

- Respond to written recommendations to the committee within 21 days. The response must include corrective action time and dates, or reasons for disagreement of recommendations.
- Conducting a minimum of one workplace inspection annually.

WORKER

- All workers shall cooperate with the committee members while they perform their JHSC duties.
- All workers shall comply with this standard, procedures and legislative requirements.

JOINT HEALTH AND SAFETY COMMITTEE

- All JHSC members shall perform duties as legislated. All JHSC members shall comply with this standard, procedure and legislative requirements.

CO-CHAIRS

The co-chairs have a crucial role to play in ensuring that a meeting runs smoothly both in the planning and running of the meeting. Both co-chairs should be involved in planning for the meeting although only one should be responsible for presiding over a meeting (a duty which the chairs should alternate every three months). The duties are:

- Schedule meetings and notifying members.
- Preparing an agenda.
- Inviting specialists or resource persons as required.
- Making sure committee's recommendations are presented to employer in writing and the committee is kept informed of the employer's response.
- Review and approve committee minutes for distribution and posting.
- Ensuring that the committee carries out its function.
- Assigning special or ongoing projects to members.
- Participating to an equal extent as other members in discussions and decisions.
- Informing the committee about any policy changes and new programs.

(Ref: s. 9 (19.1))

SECRETARY

The secretary is often the one who, with the backing of the chairs, make sure things get done on time.

Duties include:

- Keeping pertinent records.
- Reporting on the status of recommendations.
- Preparing the minutes and posting minutes in the appropriate areas.
- Posting and updating safety committee's members name and first aid certified members name.
- Distributing the minutes for approval.
- Disseminating safety information to members.
- Assisting the co-chairpersons as required.
- Arranging for meeting room, logistics, etc.
- Providing notices and copies of all required material to all committee members, and arrange for posting and distribution of minutes, etc.
- Handling all information requests from the committee.
- Arranging with Supervisors to have employee committee members made available for committee function as required.
- Liaise with co-chairs and other levels of management.
- Maintaining the Joint Health and Safety Committee binder.

(Reference: OHSA, s.8&9)

SITE HEALTH AND SAFETY REPRESENTATIVE

PURPOSE

To outline the requirements and responsibilities with regards to the site health and safety representatives.

SCOPE

Applies to all MJ Dixon Construction Limited site superintendents and employees who may act as a Health and Safety Representative on site, including subcontractor employees.

SELECTION

On MJ Dixon Construction Limited sites with 6-19 employees, a health and safety representative is required. The H&S Representative must be selected by the workers on site, and must be a worker themselves.

BASIC RESPONSIBILITIES

The following are the basic responsibilities of the site Health and Safety Representative:

- Conduct monthly inspections.
- Make recommendations to their site superintendent/management.
- Assist the site superintendent in accident/incident investigations.
- Act as a representative of the workers on site, with regards to health and safety

(Reference: OHSA, s.8)

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	July 2023	<i>Annual Review. No Changes.</i>	Paul Chiang
Mauricio Carmona	July 2024	<i>Annual Review. No Changes.</i>	Paul Chiang
HSE Department	December 2024	<i>Updates to pages 143 & 144:</i> <ul style="list-style-type: none"> • <i>The Act now allows Joint Health and Safety Committees (JHSCs) to meet remotely or virtually so long as worker representatives or JHSC members have access to all pertinent information required. Additionally, the employer may post committee information (e.g., names and work locations of JHSC members) in a readily accessible electronic format instead of in the physical workplace.</i> 	
HSE Dept.	July 2025	<i>Annual review. No changes.</i>	Paul Chiang

WORKPLACE VIOLENCE AND HARASSMENT POLICY STATEMENT

Document Name: Workplace Violence and Harassment Policy Statement	Document Number: PS002
Prepared by: Mauricio Carmona	Date of Issue: August 2022
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: 1

M.J Dixon Construction Limited recognizes the potential for workplace violence and harassment and is committed to working with employees to provide a safe and respectful work environment.

M.J Dixon Construction Limited does not condone and will not tolerate workplace violence and harassment and will take all reasonable and practical measures to prevent violence and harassment from occurring on company premises, while an employee conducts company business at other locations, during work-related travel or when conducting business by phone.

The Occupational Health and Safety Act defines:

Workplace Violence as: the exercise of physical force, the attempt to exercise physical force, or a statement or behavior that it is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker.

Workplace Harassment as: engaging in a course of vexatious comment or conduct against a worker in a workplace, including virtually through the use of information and communications technology, that is known or ought reasonably to be known to be unwelcome.

Workplace Sexual Harassment as:

- a. engaging in a course of vexatious comment or conduct against a worker in a workplace, including virtually through the use of information and communications technology, because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome or
- b. making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

Employees will be trained in recognizing and reporting violence and harassment in the workplace. All employees are encouraged to raise concerns relating to workplace violence and harassment to management without fear of retaliation or penalty. Reported incidents of workplace violence and harassment will be taken seriously and information regarding any harassment complaint or incident will not be disclosed except to the extent necessary to protect workers, to investigate and to take corrective action or as otherwise required by law. Employees will always be made aware of the importance of maintaining respect in the workplace.

Management is responsible for ensuring that this policy and related procedure are being followed by employees and ensuring that they understand that workplace violence or harassment is unacceptable from anyone in any form. Management pledges to investigate all incidents and complaints of workplace violence and harassment in a reasonable and timely manner, respecting the privacy of all concerned to the extent possible, except where required by law. Management also is accountable for putting an end to any discrimination or harassment they are aware of, whether there is a complaint or not.



M.J Dixon Construction Limited – Vice President

July 2025

Date

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	July 2023	<i>Annual Review. No change.</i>	Paul Chiang
Mauricio Carmona	August 2024	<i>Annual Review. No change.</i>	Paul Chiang
HSE Department	December 2024	<i>The definitions of workplace harassment and workplace sexual harassment under Definitions have been updated to include virtual interactions that occur through various forms of technological platforms.</i>	Paul Chiang
HSE Dept.	July 2025	<i>Annual review. No change.</i>	Paul Chiang

ANTI-DISCRIMINATION POLICY STATEMENT

Document Name: Anti-Discrimination Policy Statement	Document Number: PS011
Prepared by: Samira Westlund	Date of Issue: May 2024
Approved by: Paul Chiang, Samira Westlund	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: No Change

M.J. Dixon Construction Limited (MJD) is committed to providing an environment free of discrimination and harassment, where all individuals are treated with respect and dignity, can contribute fully, and have equal opportunities.

MJD will not tolerate, ignore, or condone any form of discrimination or harassment and is committed to promoting appropriate standards of conduct at all times. Acts of discrimination with respect to the following characteristics, as defined by the Ontario *Human Rights Code (Code)*, are strictly prohibited: race, ancestry, place of origin, colour, disability, ethnic origin, citizenship, creed, sex, sexual orientation, gender identity or expression, age, record of offences, marital or family status.

MJD believes that every person has the right to be free from harassment and discrimination. The right to freedom from discrimination and harassment extends to all MJD employees, including full-time, part-time, temporary, probationary, and contracted staff. It is also unacceptable for members of MJD to engage in harassment or discrimination when dealing with clients, contractors, or with others it has professional dealings with, such as suppliers or service providers.

MJD is committed to a comprehensive strategy to address harassment and discrimination, including:

- Providing training and education to make sure everyone knows their rights and responsibilities,
- Regularly monitoring organizational systems for barriers relating to *Code* grounds, and
- Providing an effective and fair complaints and investigation procedure.

Creating and maintaining a respectful workplace is a shared responsibility. All MJD employees are expected to uphold and abide by this policy, by refraining from any form of harassment or discrimination, and by cooperating fully in any investigation of a harassment or discrimination complaint.

It is the responsibility of Senior Management to exercise its authority to prevent discrimination and to respond and investigate promptly to incidents of harassment and discrimination. If a claim of harassment or discrimination is proven, disciplinary measures will be applied, up to and including termination of employment.

This policy and any coordinating procedures will be reviewed annually. Any updates made will be communicated as appropriate.



MJ Dixon Construction Ltd. – Vice President

July 2025

Date

WORKPLACE VIOLENCE AND HARASSMENT PROCEDURE

Document Name: Workplace Violence and Harassment Procedure	Document Number: SJP74
Prepared by: Mauricio Carmona	Date of Issue: August 2022
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: 2

1. Purpose

M.J. Dixon Construction Limited (MJD) is committed to providing a harmonious and harassment and violence free workplace. Discrimination, harassment, bullying and workplace violence are unacceptable behaviours. This program identifies the procedures to follow in the event of an incident involving workplace violence or harassment.

2. Scope

This program applies to all MJD employees, including full-time, temporary and contract staff, as well as students, interns and apprentices, subcontractors, clients, customers, suppliers, strangers and domestic/intimate partners.

Violence or harassment, including sexual harassment, will not be tolerated. Violation of this policy may result in immediate removal from MJD project or premises.

Objectives of this policy are to:

- Ensure that no employee is exposed to Violence & Harassment in the workplace; and
- Ensure that appropriate disciplinary measures are taken against any employee found to have committed violence or harassment against another employee up to and including dismissal

3. Definitions

Critical Injury: Means an injury of a serious nature that,

- (a) places life in jeopardy,
- (b) produces unconsciousness,
- (c) results in substantial loss of blood,
- (d) involves the fracture of a leg or arm but not a finger or toe,
- (e) involves the amputation of a leg, arm, hand or foot but not a finger or toe,
- (f) consists of burns to a major portion of the body, or
- (g) causes the loss of sight in an eye

Discrimination: Discrimination is usually described as the act of treating a person unequally by imposing unequal burdens or denying benefits based on a protected ground in the Human Rights Code.

Workplace Harassment: Engaging in a course of vexatious comment or conduct against a worker in a workplace, including virtually through the use of information and communications technology, that is known or ought reasonably to be known to be unwelcome.

Workplace Sexual Harassment: Means,

- a. engaging in a course of vexatious comment or conduct against a worker in a workplace, including virtually through the use of information and communications technology, because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome or
- b. making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

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

Workplace Violence: Means,

- (a) the exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker,
- (b) an attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to the worker,
- (c) a statement or behaviour that it is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker.

Domestic Violence: A person who has a personal relationship with a worker – 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 worker at work. In these situations, domestic violence is considered workplace violence.

4. Roles and Responsibilities

Senior Management/Supervisors:

- Take all reasonable preventative measures to protect employees and others from workplace violence and harassment.
- Ensure a workplace violence assessment has been conducted and will be re-assessed as needed following any incidents of workplace violence.
- Develop controls based on the risk assessment including:
 - Establish procedures, policies, and work environment arrangements to eliminate the risk to employees from violence.
 - Proper maintenance and testing of all security systems (including but not limited to surveillance cameras, lighting, panic button, intercom, etc.).
 - Ensure all employees are trained on the Workplace Violence and Harassment Policy and corresponding procedures.
 - Procedures, policies, and work environment are arranged and implemented to minimize the risk to employees.
 - Reporting procedures are established with respect to workplace violence and harassment.
 - Process is in place for responding to incidents of workplace violence.
 - This policy and procedure are posted and communicated to all staff.

Safety Expert:

- In consultation with Senior Management, conduct a workplace Violence Risk Assessment.
- Notify the JHSC/HSR in writing, the results of the assessments.
- Establish specific procedures, training programs and controls to prevent incidents of violence in the workplace in consultation with the JHSC/HSR.
- Conduct a re-assessment as often as necessary to ensure that the workplace violence and harassment program still protects employees.
- Investigate all complaints and incidents of workplace violence and harassment.
- Document and provide a written report to prevent reoccurrence.
- Ensure all documents and investigation records will be kept confidential.

Employees:

Shall not harass, threaten violence, or engage in any violent behaviour in the workplace, at any work-related functions or in any other work-related circumstances.

- Immediately report all incidents or injuries arising from workplace violence or harassment to Senior Management or Supervisor.
- Notify police or emergency responders in the event of an extreme or imminent threat of physical harm to themselves or any person at MJD.
- Participate in information updates and training regarding workplace violence and harassment provided by the Company.
- Fully cooperate in any investigation of complaints or incidents of workplace violence or harassment as indicated within this program.

5. Procedure

Workplace Violence Risk Assessment

- Pursuant to the OHSA, MJD will assess the risks of workplace violence that may arise from the nature of the workplace, the type of work, or the conditions of work.
- In conducting a Workplace Violence Risk Assessment, MJD will take into consideration all elements prescribed by the OHSA.
- MJD will advise all individuals/groups that are to be advised of the Workplace Violence Risk Assessment pursuant to section 32.03 of the OHSA. Further, where it is written, a copy of the Workplace Violence Risk Assessment results will be provided to all individuals/groups, as required by the OHSA.
- MJD will reassess the risks of workplace violence as often as is necessary to ensure that this program and the related policy continue to protect its workers from workplace violence.

Worker Information and Instruction

- MJD will provide instruction and supervision to its workers regarding:
 - The rights and responsibilities of the employees under the OHSA.
 - The measures taken by the Company to minimize or eliminate the risk of violence and harassment.
 - How to recognize a situation in which there is a potential for violence and harassment and how to respond appropriately.
 - How to report, document and investigate incidents of workplace violence and harassment.
 - Any other information or instruction that the employer is obligated to provide to its workers pursuant to the OHSA.

The above instruction and supervision will be achieved by:

- Producing any written Workplace Violence Assessment Report in accordance with the OHSA.
- Posting a copy of the Workplace Violence and Harassment Policy.
- Making available a copy of this program to all workers.
- Providing training, as needed, to all workers.
- Making available a copy of the OHSA.
- Any other method by which the Owner/Management is obligated to provide information and instruction to its workers pursuant to the OHSA.

Risk Reduction Measures

The following measures are in place to minimize the potential of workplace violence or harassment:

- Visitors (other than clients, program attendees and visiting professionals) are required to register while on premises. Any person with a history of violence or harassing behavior may be restricted from accessing our premises or job sites.
- All exterior entrances are always locked to the outside except for the front entrance. No exterior doors are to be propped open. The front entrance will remain open during normal business hours. If a member of staff believes an individual in reception/waiting area may be violent or exhibiting harassing behavior, he or she will notify Management immediately.
- The screening process for new employees, students and volunteers will include a police record check to reduce the risk of hiring individuals with a history of violent or harassing behavior.
- New staff members will be required to complete training on the Workplace Violence and Prevention Policy, including any risks of Violence or Harassment relating to their employment and procedures for managing potentially violent or harassing situations.
- Annual training on Violence and Harassment prevention will be provided for all staff. Emphasis will be put on the different needs and levels of personnel – for example, stress management, teamwork, conflict resolution, non-violent crisis intervention, bullying and violence in the workplace including domestic violence, and other related topics.
- The JHSC will conduct monthly inspection of Office while Jobsites will have HSR perform inspection, to assess hazards related to safety matters, including vulnerabilities to workplace violence – for example, lighting and building security.

MJD will ensure that appropriate corrective action is taken to reduce risks. The violence risk assessment and controls required will be addressed in workplace violence risk assessment.

Reporting Workplace Violence and Harassment

We all share responsibility in creating a workplace that is free of violence and harassment and does not tolerate behaviours of violence or threats of violence, harassment, or bullying. All staff, clients, and visitors of MJD have a duty to report incidents of workplace violence and harassment as outlined below.

Imminent Danger—Immediate Reporting

Any worker who finds or considers themselves or someone else to be in imminent danger while on Company property or while engaged in any company-approved activity can summon immediate assistance by contacting:

1. Police or emergency responders at 911
2. An MJD Supervisor or Manager
3. JHSC/HSR or Safety Expert

Violent Incidents/Threats of Violence

Workers who become involved in or witness a violent incident or a threat of violence or who receive a report of such an incident are required to:

- Ensure their own safety (remove yourself from situation).
- Do what is safely possible to ensure a victim's safety.
- Call 911 if necessary.

4. Make a formal report/statement to a Supervisor, who will then escalate to the Safety Expert

Non-Urgent Threats

Incidents involving statements or behaviours that do not present an immediate risk of physical harm, but make the worker feel threatened or otherwise concerned for his/her safety must be reported promptly to the Owner/Management.

Examples include harassing or bullying behaviour, a threatening comment, note, email, voicemail, gesture or a behaviour such as stalking.

The worker can contact the Safety Consultant if members of Senior Manager is the problem. A formal report must be completed.

In addition, if you believe you have experienced discrimination or harassment in the workplace, you may be able to file a human rights complaint with the Human Rights Commission.

Domestic Violence

Workers experiencing domestic violence are encouraged to report their concerns to the Owner/Management. Alternatively, the worker can contact the Safety Expert and should do so if they feel the violence may extend to company property.

Workers who become aware, or ought reasonably to be aware, of workers involved in domestic violence that would likely expose the worker to physical injury on company property should encourage the worker at risk to immediately inform Senior Management, a Supervisor and the Safety Expert.

Persons with a History of Violence

Workers must immediately inform Senior Management or a Supervisor if there is the potential for encountering a person known to them as a person with a history of violence on company property and if the risk of violence is likely to expose the worker to physical injury.

The information provided will be no more than is necessary to protect the worker from physical injury from the person with a history of violence.

Threatening Behaviour

Workers who become aware of a person exhibiting harassing behaviour or behaviour that may lead to violence must immediately contact Senior Management, who will be responsible for informing the Safety Consultant.

The worker can contact the Safety Expert directly if a member of Senior Management or a Supervisor is the problem. Examples of such behaviour include inappropriate or aggressive discussions or communication via phone, text message, email, websites, social media, or a fascination with death or weapons.

Reporting Requirements

All workers are required to immediately report acts of violence, threats, or possession of weapons on company property or during company-approved activities to the Owner/Management.

All workers are encouraged to report people of concern to a Supervisor. When a worker receives medical attention, misses work, or loses wages because of an injury from workplace violence the WSIB Form 7 (Employer's report of injury /disease) must be completed.

If the injury is critical or fatal the Ministry of Labour (MOL) must be contacted immediately.

The JHSC/HSR must be informed if a person requires medical attention due to workplace violence.

Investigations & Documenting a Report of Workplace Violence and Harassment

Supervisors in consultation with the Safety Expert will conduct an objective investigation within 24 hours of reports of workplace violence and harassment.

Within 10 days of the investigation being completed, the worker who allegedly experienced the workplace violence or harassment and the alleged harasser/offender, if he or she is a worker of the Senior Management, will be informed in writing of the results of the investigation and any corrective action taken or that will be taken by Senior Management to address workplace harassment.

Reports and Investigations will be recorded and kept in accordance with the Document and Records Control Procedure.

Responding to Reports of Domestic Violence

For situations involving domestic violence that would likely expose a worker to physical injury on company property, the Supervisor and Safety Expert will assist by meeting with the worker and developing a safety plan, if necessary, in consultation with police, courts or other agencies that may already be involved and identify measures that may be taken by the worker and the company to increase the worker's safety while at work.

Notices

If workplace violence results in a person being killed or critically injured, Senior Management must:

- Immediately notify, by direct means such as telephone, a Ministry of Labour (MOL) inspector, the Safety Expert and the JHSC/HSR
- Within 48 hours notify, in writing, the MOL director, giving the circumstances of the occurrence and any information that may be prescribed.

If there is an incident of workplace violence and a worker is disabled or requires medical attention, Senior Management must notify the JHSC/HSR and Safety Expert within four days of the incident. This notice must be in writing and must contain any prescribed information. If required by an inspector, this notice must also be given to the director of the MOL.

Notices are not required for incidents of harassment.

Record Keeping

Records of the investigation will be kept including:

- A copy of the complaint or details about the incident.

- A record of the investigation including notes.
- A copy of the investigation report.
- A summary of the results of the investigation that was provided to the alleged victim and perpetrator.
- A copy of the corrective action taken to address the complaint or incident of workplace violence or harassment, and the steps taken to protect workers and prevent a recurrence.

All records of the investigation will be kept confidential.

The investigation documents should not be disclosed unless necessary to investigate an incident or complaint of workplace harassment or violence, take corrective action, or otherwise as required by law.

Records will be kept for at least one year.

Work Refusals

Violence is grounds for work refusal if the employee has reason to believe that violence or the threat thereof, is likely to endanger him or herself. However, work cannot be refused on the grounds of workplace harassment.

Reprisals

There will be no reprisal for any employee making a genuine complaint of workplace violence or who act as witnesses. However, if it is determined that a false accusation has been made in bad faith, appropriate measures will be taken.

Discipline

MJD policy regarding workplace violence and harassment is zero-tolerance. This means that acts of workplace violence and harassment will not be tolerated from any person and will be responded to with appropriate disciplinary action, up-to and including termination based on a thorough investigation of the incident and surrounding circumstances.

Vicarious Liability

The Human Rights Code provides that MJD is liable for the actions of an officer, official, employee or agent of MJD when such actions are done in the course of his/her employment.

Program Evaluation

This procedure will be evaluated annually. Any gaps will be identified and corrected, as appropriate and communication to employees made.

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	July 2023	<i>Annual Review. No Changes.</i>	Paul Chiang
Mauricio Carmona	August 2024	<ul style="list-style-type: none"> Added numbering system to define procedure steps 	Paul Chiang

		<ul style="list-style-type: none"> • Updated Section 3: Definitions to include definitions for Critical Injury and Discrimination • Updated Section 5: Procedure to include requirements for: <ul style="list-style-type: none"> ○ Immediate Reporting ○ Violent Incidents/Threats of Violence ○ Notices ○ Recordkeeping ○ Work Refusals ○ Discipline ○ Vicarious Liability ○ Program Evaluation 	
HSE Department	December 2024	<ul style="list-style-type: none"> • Definitions of workplace harassment and workplace sexual harassment have been updated to include virtual interactions that occur through various forms of technological platforms (page 152) 	Paul Chiang
HSE Dept.	July 2025	<ul style="list-style-type: none"> • Annual review. No change 	Paul Chiang

RETURN TO WORK POLICY STATEMENT

Document Name: Return to Work Policy Statement	Document Number: PS006
Prepared by: Mauricio Carmona	Date of Issue: August 2022
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: No Change

PHILOSOPHY

The Management of MJ Dixon Construction Limited is committed to cooperating with all employees who have been injured on the job site and will do everything we can for an early and safe return to work. Appropriate and early work reintegration maintains a worker's dignity and productivity which plays an important role in their recovery and rehabilitation. At MJ Dixon, we will provide a modified work program to any of our injured employees until he/she is able to return to their pre-accident job, wherever possible.

RETURN TO WORK DEFINITION

Return to work is the process or strategy of safely returning employees to the workplace on a timely basis.

ROLES AND RESPONSIBILITIES:

EMPLOYER

- Contact injured worker ASAP and stay in regular contact. Cooperate in providing suitable work.
- Give WSIB information as required.
- Provide workers with Functional Abilities Form to take to the testing practitioner for completion.
- Educate workers about the return to work program.
- Set specific time frames for the return to work.
- Review worker's progress regularly.
- 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.

WORKER

- Contact supervisor immediately of any injury. If not available, phone office and contact employer.
- Stay in regular contact.
- Help identify and cooperate in suitable work arrangements.
- Give WSIB information as required.
- Return to work within 24 hours with the completed form to develop with the employer an early and safe return to work.
- Choose a doctor or qualified practitioner. Note: A change in doctor cannot be made without permission of WSIB.

WSIB

- Ensure the proper administration of all claims.

DESIGNATED RTW COORDINATOR

- Act as a central point of contact to communicate and coordinate the return to work process with all involved parties such as the worker, union, supervisors, health professionals and the insurance provider

CO-WORKERS

- Support the returning employee

UNION OR EMPLOYEE REPRESENTATIVE

- Take an active role as partners in the accommodation process.

HEALTH PROFESSIONAL

- Provide appropriate, effective health care that facilitates recovery and expedites return to productive work.

GOAL

MJ Dixon will:

- Assess everyone's situation according to any practitioner's report and recommendations and will provide some kind of modified work to suit the degree of injury.

- Assist in the employee's active recovery and encourage the worker to return to work to their pre-accident job, wherever possible.
- Identify jobs that are suitable for accommodating injured workers on a temporary basis to facilitate the early and safe return to work program and limit any loss of their earnings.

ACCOMMODATIONS

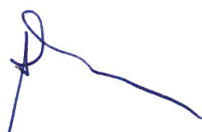
A change or modification to the job or workplace so that the work is within the injured or ill person's functional capabilities and the risk of injury is reduced.

TYPES OF ACCOMMODATIONS

- Reduce hours
- Graduate RTW hours
- Re-assign duties
- Restructure the job
- More frequent rest breaks
- Work platform vs. ladders
- Ladders for climbing scaffolds
- Mini stretch breaks (10-15 minutes)
- Chair with back support vs. Picnic table
- Anti-vibration tools (e.g. anti-vibration jackhammer)
- Make heavy tools available at waist height
- Light shop work, general clean-up
- Painting trailers, containers (light work with brush)
- Washing trucks
- Pickup or delivery of plans
- Training in their selected field, where possible
- Computer training in safety prevention, if available
- Increasing of awareness

FIRST AID

First Aid Stations are available at all job sites. Employees with Valid First Aid Certificate will provide first aid assistance when required.



MJ Dixon Construction Limited- Principal

July 2025
Date

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	July 2023	<i>Annual Review. No Changes.</i>	Paul Chiang
Mauricio Carmona	July 2024	<i>Annual Review. No Changes.</i>	Paul Chiang
Senior Management	September 2024	<i>No changes required.</i>	Paul Chiang
HSE Dept.	July 2025	<i>Annual review. No changes</i>	Paul Chiang

RETURN TO WORK PROCEDURE

Document Name: Return to Work Procedure	Document Number: SJP75
Prepared by: Mauricio Carmona	Date of Issue: August 2022
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: 1

PURPOSE

This Return to Work (RTW) program is designed to reduce the effects of a work-related accident or illness. Its success depends on communication and the worker's return to the pre-incident job position or to a "modified or "rehabilitative" job is the only measure of success.

SCOPE

This program applies to all MJ Dixon Construction Limited employees.

Forms

- Return to Work Package:
 - Return to Work Plan - HSF026
 - Letter to Health Care Professional - HSF027
 - Letter to Worker - HSF028
 - RTW Contact Log - HSF029

PROCEDURE

STEP 1 – CALL THE WORKER

First collect the information you need to prepare for the worker's return. The worker must provide a medical assessment (i.e. Functional Abilities Form) to management. Contact the worker or the worker's family as quickly as possible. Concentrate on establishing a good relationship with the worker and the worker's family by offering assistance and information. Unless it is impossible for the worker to return to work, contact the worker regularly.

STEP 2 – REINTEGRATION PLAN

The injured worker's supervisor/management will assess the medical report(s) and provide suitable modified work that is consistent with the worker's functional abilities form. This will be done using the existing Physical Demands Matrix which was developed through the Job Hazard Analysis.

It is the employer's duty to modify the work or workplace to accommodate to the needs of the worker. This may include working in a modified setting (fewer hours, alternate duties, physical change to environment, job sharing, task alteration, work process changes, etc.). If work is modified, the injured worker will be provided with a documented description of the modified work, and RTW Schedule. The injured worker must sign the forms as well as the supervisor/manager. If management and the employee cannot agree on a workable solution, the WSIB may be contacted and a mediator brought in to assist towards a resolution. After verbal and written instruction is provided, the injured worker should then be asked to begin performing the modified job while in the presence of the supervisor. The injured worker should be observed for a while to ensure that the work being performed does not exceed the workers physical restrictions and that difficulties are not encountered.

STEP 3 – PROGRESS EVALUATION

The supervisor/manager of the worker must evaluate the worker's progress on a weekly basis during their re-integration plan. This evaluation will be documented and will include the signature of both the supervisor/manager and the worker. Based on the evaluation, the modified duties may be adjusted for the following week. The worker will only return to their normal job function once given written clearance by a physician.

DETERMINING FITNESS FOR ESSENTIAL DUTIES

To determine the essential duties of a worker's pre-injury job, the duties necessary to achieve the actual job outcome is considered. The "job outcome" is the overall objective of the job in terms of the production of the final product or provision of service. In addition, the following factors are considered

- how often each duty is undertaken
- the proportion of time spent at each duty
- the effect on the job outcome if a duty is removed
- the effect on the process before or after a duty, if a duty is removed
- the current job description, and
- the normal productivity expected in the job.

The "normal productivity expected in the job" refers to the rate, range or level of production or service expected for the job.

RE-EMPLOYMENT

M.J. Dixon Construction Limited's obligation to re-employ begins when it is notified that an injured construction

worker is medically able to perform

- the essential duties of his or her pre-injury job
- suitable construction work, or
- suitable non-construction work.

Following notification, M.J. Dixon must offer to re-employ the injured worker in the first job that becomes available that is consistent with the worker's medical ability to return to work.

M.J. Dixon's offer of work must consider its obligation to accommodate the work or the workplace, to the needs of the worker, to the extent that the accommodation does not cause undue hardship.

In all cases where the worker is medically able to perform some type of construction work, M.J. Dixon has more than one construction job available must offer to re-employ to the worker in the construction job that is most similar in nature and earnings to the one the worker had on the date of injury.

M.J. Dixon's obligation to re-employ continues until the earliest of

- two years from the date of injury
- one year after the worker is medically able to do the essential duties of the pre-injury job
- the date the worker declines an offer of work, or
- the date the worker reaches age 65.

SUITABLE WORK

Suitable work means post-injury work that is safe, productive, consistent with the worker's functional abilities,

and that, when possible, restores the worker's pre-injury earnings.

Safe

The following factors should be examined when considering whether post-injury work is safe

- the work does not pose a health or safety risk to the worker (e.g., should not cause re-injury or a new injury), to co-workers, or to third-parties
- the work is performed at a worksite that is covered by either the Occupational Health and Safety Act or the Canada Labour Code, and
- the worker has the functional ability to travel safely to and from the proposed worksite.

To determine the worker's ability to travel safely, the following factors should be considered

- whether the worker's work-related injury/disease restricts his or her capability for safe travel (e.g., a worker with a fractured leg, and on crutches, may not be able to walk on icy ground safely), and
- whether the mode of transportation the worker is required to use to travel to the proposed worksite poses a health or safety risk to him or her or to the general public (e.g., a worker with a broken right foot would

Productive

Productive work is work

- that the worker has, or can acquire, the necessary skills to perform, and
- whose tasks provide an objective benefit to M.J. Dixon.

Another relevant factor is whether the worker is performing productive tasks for the entire shift, or only a portion of the shift.

Consistent with the worker's functional abilities

A job is considered consistent with the worker's functional abilities when the tasks and/or duties associated with the job can be performed within the reported physical/cognitive capabilities of the worker

Pre-injury earnings

A worker's pre-injury earnings may refer to either the worker's average earnings at the time of the injury, or any appropriate recalculation of those earnings.

Work Transition

The WSIB provides a work transition (WT) assessment to determine what specialized assistance a worker requires to enable a return to work with the injury employer or, if necessary, in a suitable occupation (SO) that is available in the labour market

Following the assessment, the WSIB, in collaboration with the workplace parties (worker and employer), union representatives and other authorized representatives determine a SO for the worker. WT assessments are considered for workers

- who have or likely have a permanent impairment
- who are not capable of performing the pre-injury job
- whose employer is unable to provide suitable and available work, or
- whose employer has identified a job, but it is unclear if the work is suitable.

WT assessment will be provided six to nine months following the date of injury. If this is not possible, the WT assessment will occur as soon as the worker is functionally fit to return to suitable work.

The WT assessments must look at all the worker's impairments/disabilities, including those that are work-related and non-work-related (e.g., including non-physical disabilities such as a learning disability) in accordance with human rights legislation.

All impairments/disabilities must be considered in identifying a SO for the worker.

Determining a Suitable Occupation

A SO represents a category of jobs suited to a worker's transferable skills that are safe, consistent with the worker's

functional abilities, and that to the extent possible, restores the worker's pre-injury earnings. The SO must be available with the injury employer or in the labour market.

When determining a SO for a worker, every effort is made to

- maintain the employment relationship between worker and M.J. Dixon by identifying appropriate occupations within company
- provide for effective and meaningful input and choice on the part of the worker in identifying a SO, and
- re-integrate workers into suitable and available work, all within a reasonable cost structure.

In determining a SO, the WSIB works with the worker and M.J. Dixon and considers

- a worker's functional abilities
- a worker's employment-related aptitudes, abilities, and interests
- what jobs are available with M.J. Dixon through direct placement, accommodation, or retraining
- labour market trends, and the likelihood of the worker being able to secure and maintain work within the occupation with another employer, and

- in accordance with applicable human rights legislation, any pre-existing non-work-related condition(s) (e.g., including non-physical disabilities such as a learning disability) a worker may have, as well as any other human rights-related accommodation requirements.

WSIB REPORTING

Management must report the following to WSIB:

- Any changes in wages as a result of the modified duty.
- Any changes in the duties or the duration of the program.
- The inability of the employee to comply or participate in the program.
- The completion of the program.

RESPONSIBILITIES

MANAGEMENT

- Promote and implement an RTW Plan and ensure the policy is up-dated, as required.
- Discuss the plan with the worker's supervisor(s) and ensure that the objective of the RTW plan is understood.
- Determine the frequency of conducting evaluations of the RTW and the worker's progress in the Plan.
- Ensure the worker signs all formal RTW plan(s).
- Obtain expert opinion and advice from designated human resources or health specialist when necessary.
- Keep information/medical records confidential

SUPERVISOR

- Promote and participate in the objectives of the program and discuss objectives with the employee(s).
- Provide RTW Plans to workers in their assigned areas.
- Assist in the collection of medical information, job description(s) for job task analysis, and the development and implementation of workplace modifications.
- Monitor the progress of all workers participating in an RTW plan and maintain records of the worker's progress and up -to-date restrictions.

WORKER

- Contact the employer during the recovery period. Contact must occur weekly or as soon as the worker is fit to return to work.
- Assist in the collection of job descriptions, task analysis, etc.
- Provide such medical information, as the employer requires, for an early and safe return to work.
- Participate in the RTW Plan and immediately report any task difficulties.
- Ensure that ongoing treatment does not interfere with the RTW Plan
- Work within the established company rules, procedures and the RTW Plan.

WSIB

- Ensure the proper administration of all claims.
 - Maintain communication with the company, and our injured workers and their health care providers.
 - Offer mediation services when a dispute arises regarding return to work.
 - Help the company and our injured workers, when necessary, through the return to work process.
 - Determine the suitability of employment and fitness to return to work.
 - Enforce our company's re-employment obligations.
- Encourage and actively assist injured workers in their successful return to work

DESIGNATED RTW COORDINATOR

- Act as a central point of contact to communicate and coordinate the return to work process with all involved parties such as the worker, union, supervisors, health professionals and the insurance provider
- Develop individual RTW Plans with input from the injured /ill workers and facilitate workplace support for the RTW program through education and resources
- Monitor the progress of each return to work case and advise all involved parties of any changes to wages, duration or duties of the plan and the closure of the plan.
- Document all activities and responsibilities in each return to work case and oversee the administration of the return to work program

CO-WORKERS

- Support the returning employee

UNION OR EMPLOYEE REPRESENTATIVE

- Take an active role as partners in the accommodation process.
- Provide accommodation advice and guidance.
- Support accommodation measures regardless of the collective agreement, unless to do so would impose undue hardship.
- Work with the employer to address existing barriers in the collective agreement, ensuring that no new barriers are added.

HEALTH PROFESSIONAL

- Provide appropriate, effective health care that facilitates recovery and expedites return to productive work.
- Provide information on the injured or ill worker's functional abilities when requested by the company, our employees or the WSIB.
- Provide timely information to the W

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	July 2023	<i>Annual Review. No Changes.</i>	Paul Chiang
Mauricio Carmona	July 2024	<i>Annual Review. No Changes.</i>	Paul Chiang
Senior Management	September 2024	<i>Added Applicable Forms (page 161)</i>	Paul Chiang
HSE Dept.	July 2025	<i>Annual review. No changes</i>	Paul Chiang

CHAPTER THIRTEEN

MANAGEMENT REVIEW

AND

MANAGEMENT OF CHANGE

SENIOR MANAGEMENT REVIEW POLICY STATEMENT

Document Name: Senior Management Review Policy Statement	Document Number: SJP25
Prepared by: Mauricio Carmona	Date of Issue: August 2022
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: No Change

Senior Management of M.J. Dixon Construction Limited (MJD) is committed to conduct an annual review of the occupational health and safety program and the occupational health and safety performance of MJD to ensure that continual improvement is being made to the occupational health and safety management system. The program and performance will be reviewed for sustainability, adequacy, and effectiveness.

EVALUATION OF OHS PROGRAM

An internal audit will be conducted annually, and a report will be submitted to the Senior Management. The audit report and the supporting documentations will be reviewed to evaluate the 14 elements of the OHS Program, including the following:

- Records such as inspections, hazard assessments, incident reports, statistical reports
- Evaluation of legal compliance (required new policy, procedure, training, etc.)
- Follow up actions from previous management reviews
- New job tasks or modification to existing tasks

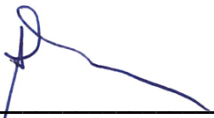
EVALUATION OF OHS PERFORMANCE

The following will be reviewed to evaluate the company's OHS performance:

- Statistical reports (weekly, monthly, yearly safety & injury reports)
- Corporate and project health and safety summaries
- Employees performance through Accountability forms, Disciplinary actions
- Review of previous year OHS objectives

Senior Management will compare 3 years of health and safety records and prepare a trends analysis. Based on the review, opportunities for improvement will be identified. An action plan will be developed to implement changes to the OHS management system. MJD health and safety objectives for the year will be identified and follow-ups will be implemented.

The action plan will be posted on the office and sites health and safety board. Senior Management will appoint appropriate individuals to implement control measures based on the action plan. Workers will be informed of the actions taken.



MJ Dixon Construction Ltd. – Vice President

July 2025

Date

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	July 2023	● Annual review. No changes made.	Paul Chiang
Mauricio Carmona	July 2024	● Annual review. No changes made.	Paul Chiang

HSE Dept	July 2025	<ul style="list-style-type: none">Annual review. No changes made.	Paul Chiang
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MANAGEMENT REVIEW PROCEDURE

Document Name: Management Review Procedure	Document Number: SJP41
Prepared by: Mauricio Carmona	Date of Issue: August 2021
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: 2

1. Purpose

To ensure that Senior Management is involved in health and safety activities at M.J. Dixon Construction Limited (MJD) and is an active participant in improving the company's safety culture.

2. Scope

This program applies to the Senior Management Team at MJD.

3. Definitions

Management Review: A review of the effectiveness of the Occupational Health and Safety Management System (OHSMS) at regularly planned intervals, and at least annually. The review will help Senior Management identify OHS objectives and aid in the development of action plans for continual improvement of the OHSMS.

4. Roles and Responsibilities

Senior Management:

- Reviewing and approving the Management Review procedure and related documents annually, at minimum, or whenever there are changes.
- Ensuring there is communication to all workers related to the implementation, objectives and actions plans of the review at least on an annual basis.
- Ensuring the requirements of this procedure are established, implemented, monitored, and maintained.
- Reviewing all reports being submitted, to determine and/or approve necessary corrective actions arising from the OHSMS review.
- Determining the resources (time and personnel) required for the implementation of the procedure.
- Designating competent persons to monitor the OHSMS and provide input/reports for the review.
- Taking accountability for the effectiveness of the review and promoting the use of process and risk-based thinking.
- Communicating the results of the management review and any corrective actions to all workers.

Safety Expert or Designate(s):

- Monitoring of the OHSMS and all external sources, including established inputs as required, to complete a thorough review of the system; this monitoring should identify all potential trends in health and safety, and any changes that will affect the OHSMS.
- Developing a detailed schedule for the review including all input items established in the procedure.
- Presenting the schedule to Senior Management for approval and communicating to all workers.
- Completing the Management Review Input Report, as per schedule and submitting to Senior Management for review.
- Completing any corrective action plans that are assigned and or approved by senior management, based on the review of the report.

- Maintain records of all management reviews, action plans, communication, and minutes of meetings.

Supervisors:

- Document all accidents, incidents, first aid occurrences, lost time injuries, equipment damage, MOL reports.
- Provide the monthly reports to management.

JHSC/HSR:

- Annually reviewing the results of the Management Review Report and resulting corrective action items created and/or approved by Senior Leadership, and providing feedback on the outputs of the review, as necessary.

Workers:

- Cooperate with the auditor during the interview.

Internal Auditor:

- Conduct the audit and submit the report to Senior Management.

5. Procedure

A written report will be compiled by the Safety Expert and Internal Auditor, at least annually, for Senior Management which will include, at minimum the following inputs:

- Evaluation of the effectiveness of all elements of the OHSMS
- Any identified changes and/or trends that may affect the OHSMS, either positively or negatively (i.e., legislative changes)
- Evaluations of compliance with legal requirements and applicable standards
- Evaluation of the extent to which health and safety objectives and policy have been met
- Status of any corrective action items identified in previous management reviews and status of actions taken
- Status of incident investigations, and any trends identified during the investigations and status of actions taken
- Health and Safety performance of the business including injury and illness rates and trends
- Results arising from internal audits, including COR audits
- Results of participation and consultation with employees/Health and Safety Representative/JHSC
- Changing circumstances related to OHS such as developments in legal requirements or technology
- Identified barriers to worker participation in the OHSMS
- Recommendations on ways to strengthen/improve the OHSMS
- Additional management review inputs to be considered:
 - Any relevant communication from external parties such as customers or supplier complaints, or evaluations conducted by third parties for legal compliance, etc.
 - Adequacy and effectiveness of the current risk assessment processes
 - Performance of suppliers
- Senior Management will review the report and provide feedback and approval to the Safety Expert or Internal Auditor, including actions items and assignment of items.

The output of the review in the form of actions will be built into an action plan which will be approved by Senior Management:

- Outputs of the review include:
 - OHS policy updates

- Measurable OHS objectives
- Action plan to achieve objectives
- Required resources for implementation
- Revisions to any other elements of the OHSMS as appropriate
- Removed barriers to worker participation in the OHSMS
- Communication of the objectives and action plan(s) to all employees
- All outputs (i.e. decisions, feedback, action plans, discussions) must be recorded in writing (i.e. minutes of meetings, action plans, etc.), on the HSM001-Management Review Meeting form via the company's software management system and stored for a minimum of 10 years and in accordance with the **Document and Record Control Procedure**.
 - Once all actions have been implemented, a copy of the completed action plan should be reported to Senior Management and stored with the corresponding Management Review report
 - All objectives, action plans and action items arising from the review will be shared with all MJD workers via annual meetings, corporate-wide newsletters, safety meetings, etc.

5.1 Records

All revisions made to the health and safety program or policy manual as a result of Management Review will be documented and retained on file at MJDs head office and in accordance with the **Document and Record Control Procedure**. Updated and approved program policies and procedures will be shared with all employees on the company's software management system for their review and acknowledgement.

6. Revisions

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	July 2022	<ul style="list-style-type: none"> ● Added Section Numbers ● Added Section 3: Definitions ● Moved up and updated Section 4: Roles and Responsibilities ● Updated Section 5: Procedure ● Added Sections 6: Revisions <i>*Changes made to reflect COR 2020 requirements</i>	Paul Chiang
Mauricio Carmona	February 2023	<ul style="list-style-type: none"> ● Updated Section 4 Roles and Responsibilities ● Updated Section 5 Procedure (Specified forms for recording Management Review) ● Added Section 5.1 Records <i>*Changes made to reflect COR 202 external audit review and findings.</i>	Paul Chiang
Mauricio Carmona	February 2024	<ul style="list-style-type: none"> ● Annual review. No changes made. 	Paul Chiang
HSE Dept.	July 2025	<ul style="list-style-type: none"> ● Annual review. No changes made. 	Paul Chiang

MANAGEMENT OF CHANGE POLICY STATEMENT

Document Name: Management of Change Policy Statement	Document Number: SJP26
Prepared by: Mauricio Carmona	Date of Issue: August 2022
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: No Change

When changes occur in M.J. Dixon Construction Limited (MJDs) Occupational Health and Safety Management System (OHSMS), the Company will ensure that hazards are properly identified, assessed, and controlled. Management of Change may take place in the following situations, but are not limited to the following:

- A change in legal requirements;
- Significant changes in work processes, control measures, equipment, organization or work location;
- The introduction of new products, processes, or services; and,
- The introduction of new developments in OHS technology.

Where changes exist that require updates and additions to the job hazard assessment list, new controls will be implemented and training will be provided to relevant workplace parties, as required. Any update following Senior Management's review will be communicated to all affected personnel.

This policy and corresponding procedure will be reviewed at least annually.



July 2025

MJ Dixon Construction Ltd. – Vice President

Date

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	July 2023	<ul style="list-style-type: none"> • Annual review. No changes made. 	Paul Chiang
Mauricio Carmona	July 2024	<ul style="list-style-type: none"> • Annual review. No changes made. 	Paul Chiang
HSE Dept.	July 2025	<ul style="list-style-type: none"> • Annual review. No changes made. 	Paul Chiang

MANAGEMENT OF CHANGE PROCEDURE

Document Name: Management of Change Procedure	Document Number: SJP42
Prepared by: Mauricio Carmona	Date of Issue: August 2022
Approved by: Paul Chiang, Mauricio Carmona	Review/Revision Date: July 2025
Frequency of Review: 1 year	Revision Number: 1

1. Purpose

The purpose of this procedure is to ensure that the health and safety risks are assessed, and controls are put in place when there are changes in the organization, including but not limited to: legislation, introduction of new developments in OHS knowledge or technology, or when adding or changing equipment, materials, articles, machinery, or processes.

2. Scope

The procedure applies to all workplace parties at M.J. Dixon Construction Limited (MJD).

3. Definitions

Management of Change - A systematic approach to dealing with organizational change that can expose or create hazards. The goal of this approach is to safeguard workers from injury or illness during the transitional phase.

4. Roles and Responsibilities

Senior Management:

- Evaluate the effectiveness of all elements in the OHSMS.
- Review changing circumstances related to OHS such as developments in legal requirements or technology
- Review and provide recommendations for improvements.

Supervisors:

- Understand and apply any changes made by Senior Management to the OHSMS.
- Communicate changes made to the OHSMS to relevant workplace parties.
- Ensure training is conducted to relevant workplace parties on changes made to the OHSMS.

Health and Safety Designate:

- Preparing the procedure, in consultation with the JHSC, and identifying training needs, and conducting the annual evaluation of the OHSMS.
- Participate in the hazard/risk assessment process for changes and maintain the Hazard and Risk List/Registry.
- Communicate changes made to the OHSMS and ensure relevant workplace parties are trained.

JHSC:

- Participate in the annual review of this procedure and its associated documents, as requested.
- Understand and apply any changes approved by Senior Management.

Workers:

- Follow changes instructed by Senior Management and site Managers/Supervisors.

5. Procedure

- A. When change occurs in the Occupational Health and Safety Management System (OHSMS), Management of Change ensures that hazards are assessed and addressed. Management of Change takes place during Senior Management's Annual Review of the effectiveness of its OHSMS.
- B. Management of Change will be implemented in the following situations, which includes at minimum:
 - a. Changes in legal requirements
 - b. Significant changes in work processes, control measures, equipment, organization, work location
 - c. Introduction of new products, processes or services
 - d. Introduction of new developments in OHS knowledge or technology.
- C. Appropriate steps shall be taken to identify hazards before the changes are made. Any identified changes will undergo MJDs Hazard Assessment, Analysis and Control Procedures, as well as its Controls Procedure.
- D. Any changes identified and implemented will be communicated to relevant workplace parties, where appropriate. The Safety Expert will use meeting minutes in the company's software management system to document the meeting content and capture communication made to the workforce about changes made to the OHSMS.
- E. All workplace parties affected by the implemented changes require training on the new processes and procedures. Health and Safety and site Managers/Supervisors will identify training needs as a result of the changes made and ensure all relevant workplace parties are trained within a reasonable timeframe. Training will be documented, and records maintained according to the **Document and Record Control Procedure**.

6. Revisions

Tracking Changes			
Reviewed by:	Review Date:	Changes	Approved by:
Mauricio Carmona	February 2023	<ul style="list-style-type: none"> • Updated Section 5 Procedure (D & E) • Added Section 6 Revisions <i>*Changes made to reflect COR 2023 external audit review and findings.</i>	Paul Chiang
Mauricio Carmona	February 2024	<ul style="list-style-type: none"> • Annual review. No changes made. 	Paul Chiang
HSE Dept.	July 2025	<ul style="list-style-type: none"> • Annual review. No change. 	Paul Chiang

REVISION TABLE					
Pg #	Date	Comments	Reviewed by	Approved by	Initial
6	Aug/20	Added JHSC/Certified Member Section	Samira Westlund – HSE Manager	Paul Chiang	SW
17	Aug/20	Revised Safety Rules	Samira Westlund – HSE Manager	Paul Chiang	SW
24 - 30	Oct/20	Revised PPE Procedures	Samira Westlund – HSE Manager	Paul Chiang	SW
59	Oct/20	Updated Emergency Contacts Numbers	Samira Westlund – HSE Manager	Paul Chiang	SW
89	Aug/20	Revised Workplace Violence & Harassment Policy Statement	Samira Westlund – HSE Manager	Paul Chiang	SW
All	Aug/21	Yearly update on all pages	Samira Westlund – HSE Manager	Paul Chiang	SW
17	Aug/21	Add Safety rule #13	Samira Westlund – HSE Manager	Paul Chiang	SW
105-106	Aug/21	Revise Management Review Procedure – Inputs and Outputs	Samira Westlund – HSE Manager	Paul Chiang	SW
All	Aug/22	Yearly update on all pages; updated to reflect COR 2020 updates	Mauricio Carmona – Site Supervisor, HSE Department	Paul Chiang	SW
All	Aug/23	Yearly review. Signature updates on all pages. Updates to reflect COR 2020	Mauricio Carmona – Site Supervisor, HSE Department	Paul Chiang	MC
All	July/24	Yearly review. Signature and date changes on all policies. Updates made to: <ul style="list-style-type: none"> • OHS Policy Statement • Procurement and Contractor Management Procedure • PPE procedure • Violence and Harassment Procedure Added: Anti-Discrimination Policy	Mauricio Carmona – Site Supervisor, HSE Department	Paul Chiang	MC
-	Dec/24	Updates made to: <ul style="list-style-type: none"> • Violence and Harassment Policy Statement 	HSE Department	Paul Chiang	HSE Department

		<ul style="list-style-type: none"> • Violence and Harassment Procedure • JHSC Procedure 			
All	July 2025	Yearly review. Signature and date changes on all policies. Updates made to: <ul style="list-style-type: none"> • Controls Procedure • Emergency Preparedness Procedure 	HSE Department	Paul Chiang	<i>HSE Department</i>