



GENERAL POLICY ON HEALTH AND SAFETY AT WORK

Health and Safety At Work:

This statement of the Elite JL Inc. General Policy on Health and Safety at Work, and of the Organization and Arrangements for carrying out that policy, is issued in accordance with the Occupational Health & Safety Act.

Company General Policy Statement:

Elite JL Inc., including all employees, sub-contractors, and all additional parties participating on any project led by Elite JL Inc., recognize their duty to comply with all applicable occupational health and safety legislation, and other relevant requirements; and to conduct their undertakings with due regard for the prevention of ill health and injury to their staff; and in such a manner that persons not in their employment are protected from risk to their health and safety, so far as is reasonably practicable.

Elite JL Inc. is committed to providing appropriate organisational structures and arrangements to ensure such duties are discharged.

Elite JL Inc. regards occupational health and safety to be of paramount importance, and have set objectives and targets, which are monitored at top management level, so as to effectively manage health and safety activities, and ensure continual improvement. This policy is to be reviewed, in full, with each new hire, and at quarterly intervals with all current employees.

Environmental Policy:

All employees, managers, and executives must consciously attempt to maintain:

1. The efficient use of natural resources, including energy.
2. The minimization of waste streams, emissions, and noise.
3. Effective recycling practices.
4. The prevention or containment of any potential contamination (including, but not limited to dust, liquid, debris, etc.).
5. The reduction, or prevention, of any environmental impact, where possible.

Summary of the Company's Health and Safety Arrangements:

1. The provision and maintenance, so far as is reasonably practicable, of a safe and healthy working environment for employees, and adequate facilities for their welfare at work.
2. The provision, so far as is reasonably practicable, of places of work with suitable access and egress, which are maintained in a safe and healthy condition.
3. Taking all reasonably practicable steps to ensure all known safety factors are considered in the design, construction, operation and maintenance of plant (including machinery, equipment and appliances).
4. The provision of safe systems of work relative to plant, materials, substances or processes used by company employees that are known to be potentially hazardous to health or safety.
5. Ensuring that adequate arrangements are in place in connection with the use, handling, storage and transport of articles and substances, and the management of road risk.
6. Ensuring that adequate information, instruction, supervision and training are given to all employees on all aspects of their work, including housekeeping, aerial platform training, working at heights training, and WHMIS training.
7. The provision, where appropriate, of approved personal protective equipment and clothing, and ensuring that it is properly used.
8. Keeping all operations and methods of work under review so that they can, if necessary, be revised in the light of changes to working practice, experience and up to date knowledge.
9. The provision of suitable facilities, equipment and training for first aid to ensure the prompt treatment of injuries and illness at work.
10. Ensuring that procedures are in operation for fire prevention and appropriate fire fighting, together with suitable training provisions for personnel involved.
11. Ensuring that professional advice is available where potentially hazardous situations exist or might arise.
12. Seeking, where appropriate, professional occupational health and medical services regarding screening for job suitability on appointment, health surveillance during service and assessment on return to work after serious illness or injury, giving consideration to the health and safety of the individual concerned, their colleagues and other persons.
13. Ensuring that procedures are in operation for the adequate response to accidents and dangerous occurrences, including reporting and investigation; and ensuring that recommendations are made and acted upon to prevent recurrences.
14. Ensuring suitable methods are in place for collecting, analyzing and presenting data on sickness and incidents, and accidents involving personal injury to health.
15. Actively promoting joint consultation in health and safety matters to encourage effective participation by all employees; to ensure the effective communication of health and safety information and that publicity is given to such matters
16. Effectively co-ordinating the activities of Elite JL Inc. and of their contractors, having particular regard to the implementation and maintenance of safe systems of work, to ensure full compliance with their obligations in relation to the health, safety and welfare of their own employees and of other persons.

General:

The health and safety responsibilities of all parties on a construction project are specified in the current *Occupational Health and Safety Act and Regulations for Construction Projects*.

Responsibilities are prescribed in particular for constructor, employer, supervisor, and worker. Each party has specific responsibilities to fulfill on a construction project.

For more detailed information, consult the current *Occupational Health and Safety Act and Regulations*.

Constructor:

- Appoint a supervisor if 5 or more workers are on the project at the same time. Ensure that the project is supervised at all times.
- A project that lasts more than 3 months and has 20 or more workers must have a Joint Health and Safety Committee.
- If a Joint Health and Safety Committee is not required and there are more than 5 workers, the workers must select a Health and Safety Representative.
- Complete a Ministry of Labour (MOL) registration form.
- Keep a copy of all employer-approved registration forms on site while employers are on the project.
- Send a notification of project to the MOL.
- Develop written emergency procedures, make sure your employees know what they are, and post them on site.
- Ensure ready access to a telephone, two-way radio, or other system in the event of an emergency.
- Report a fatality, critical injury, or other prescribed incident such as a critical injury to the MOL.
- Ensure all workers on site are at least 16 years of age.

Employer:

- Read Sections 25 and 26 of the *Occupational Health and Safety Act*. It lists many of your responsibilities.
- Appoint a supervisor if 5 or more of the employer's workers are on the project at the same time. Ensure that they are supervised at all times.
- Provide workers with training as required by law (e.g., fall protection systems, WHMIS, etc.).
- Ensure workers are qualified to do work which must be done only by qualified workers (e.g., electricians, pipe fitters, etc.).
- Develop written procedures for rescuing a worker whose fall has been arrested (a worker hanging by a harness).

Supervisor:

Supervisors must ensure that workers;

- Use the methods, procedures, and equipment required by the *Occupational Health and Safety Act* and Regulations for Construction Projects.
- Use or wear the equipment or clothing that the employer requires Supervisors must also
- Tell workers about actual or potential dangers
- Give workers written instructions when required
- Take every precaution reasonable to protect workers.

Worker:

- Select worker representatives for the Joint Health and Safety Committee.
- Tell your supervisor or employer about equipment problems or other hazards that could hurt you or other workers.
- You have the right to refuse work that you believe endangers your health or safety — or the health or safety of others. See Section 43 of the *Occupational Health and Safety Act*.
- Follow your employer's instructions to use or wear equipment, protective devices, or clothing.
- Never engage in horseplay on site (pranks, competitions, showing off your strength, roughhousing, or unnecessary running).

Health and Safety Representative:

The health and safety representative must be familiar with;

- The current *Occupational Health and Safety Act and Regulations for Construction Projects*
- Procedures in the event of an emergency (see chapter on Emergency Procedures)
- Procedures for refusal to work where health and safety are in danger

Accidents and Injuries:

All accidents and injuries, regardless of severity, must be reported immediately.

Procedures for reporting accidents, and the type of accidents that must be reported, are spelled out in the *Occupational Health and Safety Act and Regulations for Construction Projects*.

Further information is available from the Workplace Safety and Insurance Board and Ministry of Labour.

Certified Committee Members:

Where a project regularly employs 50 or more workers, the health and safety committee on the project must have at least one member representing workers and one member representing the constructor who are certified by the Workplace Safety and Insurance Board.

If no members of a health and safety committee are certified, the workers and constructor must each select one member of the committee to become certified.

A certified member who receives a complaint regarding a dangerous circumstance can investigate the complaint under the authority of the *Occupational Health and Safety Act*. The member may also ask a supervisor to investigate a situation where the member "has reason to believe" that a dangerous circumstance may exist.

The supervisor must investigate the situation promptly in the presence of the certified member.

The certified member may also request that another certified member representing the other party at the workplace investigate the situation if the first certified member "has reason to believe" that the dangerous circumstance still exists after the supervisor's investigation and remedial action, if any, has been taken.

The second certified member must promptly investigate the situation in the presence of the first certified member and, if both certified members agree, they may direct the constructor or employer to stop work or stop the use of any part of the workplace, including machines and other equipment. The constructor or employer must immediately comply with the order.

If both certified members do not agree that a dangerous circumstance exists, either may request that a Ministry of Labour inspector investigate the situation. The inspector must investigate and provide both members with a written report.

Ministry of Labour Inspectors:

The inspector can visit a site at any time and exercise fairly broad powers to inspect, ask questions, and give orders. If the inspector approaches a worker directly, the worker must answer questions and cooperate. The supervisor must be informed of any orders given or recommendations made.

In some cases the health and safety representative, worker member of a health and safety committee, or worker selected by fellow workers or the union has a right to take part in accident investigation.

The results of accident investigation and reporting should be made known to all personnel on site. Recommendations should be implemented to prevent the accident from happening again.

In all cases of injury, the EMPLOYER must do the following:

1. Make sure that first aid is given immediately, as required by law.
2. Record the first aid treatment or advice given to the worker.
3. Complete and give to the worker a Treatment Memorandum (Form 156) if health care is needed.
4. Provide immediate transportation to a hospital or a physician's office, if necessary.
5. Submit to the Workplace Safety and Insurance Board (WSIB), within three days of learning of an accident, an Employer's Report of an Accident/Injury/Industrial Disease (Form 7) and any other information that may be required.
6. Pay full wages and benefits for the day or shift on which the injury occurred when compensation is payable for loss of earnings.
7. Notify the Ministry of Labour, health and safety representative and/or committee, and union as required by legislation.

The WORKER must do the following:

1. Promptly obtain first aid.
2. Notify the employer, foreman, supervisor, and worker safety representative immediately of an injury requiring health care and obtain from the employer a completed Treatment Memorandum (Form 156) to take to the physician or the hospital. Failure to report promptly can affect your benefits and subject your employer to fines.
3. Choose a physician or other qualified practitioner with the understanding that a change of physician cannot be made without permission of the WSIB.
4. Complete and promptly return all report forms received from the WSIB.

New Hires:

Statistics show that approximately 20% of all injuries to workers occur within their first 30 days on the job. This fact highlights the importance of orientation.

The new hire may be young or old, male or female, experienced or inexperienced in construction. The worker may be new to the site, new to the type of work, or new to the company. A worker coming to any project for the first time should be considered a "new hire."

New employees must be told and, if necessary, trained and shown what is expected of them in:

- work performance
- safe operation of tools and equipment
- procedures around hazardous materials
- proper use of any required personal protective clothing and equipment.

They must also be told, and preferably shown, the location of:

- first aid kit or first aid station
- fire alarms and exits
- fire extinguishers and standpipes
- emergency telephones
- eyewash station
- supervisor's office
- tool crib
- washrooms
- lunchroom.

These locations can be pointed out during a tour of the workplace when the new hire is introduced to co-workers, supervision, and the health and safety representative.

To make orientation successful, supervisors should follow some simple steps:

- Talk to new hires. Put them at ease. Find out how much they know already. Explain why their job must be done right, how it relates to the rest of the operation, and what hazards may be involved.
- Explain assignments carefully to new workers. Tell them, show them, and ask questions to make sure they understand. Cover one step at a time. Make key operations and safety points clear. Be patient and go slowly.
- Test the new hire's performance. Watch while the job is being done. Commend good work. When necessary, show how the job can be done more safely and efficiently.
- Let new workers continue on their own. Tell them who to contact for help and encourage them to get help when needed.
- Follow up. Check on work frequently at first. Look for any bad habits, unnecessary motions, or unsafe acts that need correcting. Ease off when you're convinced that workers are doing the job safely and correctly.

Jobsite Safety Talks:

Jobsite talks can help prevent accidents and injuries by promoting hazard awareness in the workplace.

Supervisors should present safety talks on a regular basis and follow these guidelines:

- Before presenting a prepared talk, look it over. Instead of reading the talk to your crew, use your own words. Personnel will more likely accept your natural manner than a formal presentation.
- Choose subjects that are directly related to site conditions or the company's health and safety policy and program.
- Encourage participation. Get the crew to talk about close calls and hazards. Solutions to these problems can become the subject of future talks.
- Make a note of any hazards the crew may mention as well as any suggestions for improving health and safety. Subjects requiring management attention should be referred to management.
- Always follow up. Tell the crew what has been done to correct problems and improve conditions on the job.

WORKPLACE VIOLENCE PREVENTION

Purpose:

Elite JL Inc. maintains a zero tolerance standard of violence in the workplace. The purpose of this policy is to provide Elite JL Inc. employees guidance that will maintain an environment that is free of violence, and the threat of violence.

Policy:

Violent behavior of any kind, or threats of violence, either implied or direct, are prohibited. Such conduct by an Elite JL Inc. employee will not be tolerated. An employee who exhibits violent behavior may be subject to criminal prosecution and shall be subject to disciplinary action up to and including dismissal. Violent threats or actions by a non-employee may result in criminal prosecution. Elite JL Inc. will investigate all complaints filed, and will also investigate any possible violation of this policy of which we are made aware. Retaliation against a person who makes a complaint regarding violent behavior or threats of violence made to him/her is also prohibited.

Definitions:

Workplace Violence: Behavior in which an employee, former employee or visitor to a workplace inflicts or threatens to inflict damage to property, serious harm, injury or death to others at the workplace.

Threat: The implication or expression of intent to inflict physical harm or actions that a reasonable person would interpret as a threat to physical safety or property.

Intimidation: Making others afraid or fearful through threatening behavior.

Zero-tolerance: A standard that establishes that any behavior, implied or actual, that violates the policy will not be tolerated.

Court Order: An order by a Court that specifies and/or restricts the behavior of an individual. Court Orders may be issued in matters involving domestic violence, stalking or harassment, among other types of protective orders, including Temporary Restraining Orders.

Prohibited Behavior:

Violence in the workplace may include, but is not limited to the following list of prohibited behaviors directed at, or by a co-worker, supervisor or member of the public;

1. Direct threats or physical intimidation
2. Implications or suggestions of violence
3. Stalking
4. Possession of weapons of any kind, while engaged in activities for Elite JL Inc., at any location, unless such possession or use is a requirement of the job
5. Assault of any form
6. Physical restraint, confinement
7. Dangerous or threatening horseplay
8. Loud, disruptive or angry behavior, or language that is clearly not part of the typical work environment
9. Blatant or intentional disregard for the safety or well-being of others
10. Commission of a violent felony or misdemeanor
11. Any other act that a reasonable person would perceive as constituting a threat of violence

Domestic Violence, while often originating in the home, can significantly impact workplace safety and the productivity of victims as well as co-workers. For the purposes of this document, "domestic violence" is defined as abuse committed against an adult or fully emancipated minor. Abuse is the intentional reckless attempt to cause bodily injury, sexual assault, threatening behavior, harassment, or stalking, or making annoying phone calls to a person who is in any of the following relationships;

1. Spouse or former spouse
2. Domestic partner or former domestic partner
3. Cohabitant or former cohabitant and or other household members
4. A person with whom the victim is having, or has had, a dating or engagement relationship
5. A person with whom the victim has a child

Elite JL Inc. recognizes that domestic violence may occur in relationships regardless of the marital status, age, race, or sexual orientation of the parties.

Reporting Acts or Threats of Violence:

An employee who:

- Is the victim of violence, or
- Believes they have been threatened with violence, or
- Witnesses an act or threat of violence towards anyone else shall take the following steps:
- If an emergency exists and the situation is one of immediate danger, the employee shall contact the local police officials by dialing 9-1-1, and may take whatever emergency steps are available and appropriate to protect himself/herself from immediate harm, such as leaving the area
- If the situation is not one of immediate danger, the employee shall report the incident to the appropriate supervisor or manager as soon as possible and complete a Workplace Violence Incident Report Form

Procedures - Future Violence:

Employees who have reason to believe they, or others, may be victimized by a violent act sometime in the future, at the workplace or as a direct result of their employment with Elite JL Inc., shall inform their supervisor by immediately completing a Workplace Violence Incident Report Form so appropriate action may be taken. The supervisor shall inform his/her Department Director or designee, the Director of Human Resources and the local law enforcement officials.

Employees who have signed and filed a restraining order, temporary or permanent, against an individual due to a potential act of violence, who would be in violation of the order by coming near them at work, shall immediately supply a copy of the signed order to their supervisor. The supervisor shall provide copies to the Department Director, the Director of Human Resources and local police.

Incident Investigation:

Acts of violence or threats will be investigated immediately in order to protect employees from danger, unnecessary anxiety concerning their welfare, and the loss of productivity. The employee's Department Director will initiate an investigation into potential violation of work rules/policies. Simultaneously, the Department Director will refer the matter to local police for their review of potential violation of civil and/or criminal law.

Procedures for investigating incidents of workplace violence include;

1. Visiting the scene of an incident as soon as possible.
2. Interviewing injured and threatened employees and witnesses.
3. Examining the workplace for security risk factors associated with the incident, including any reports of inappropriate behavior by the perpetrator.
4. Determining the cause of the incident.
5. Taking mitigating action to prevent the incident from recurring.
6. Recording the findings and mitigating actions taken.

In appropriate circumstances, Elite JL Inc. will inform the reporting individual of the results of the investigation. To the extent possible, Elite JL Inc. will maintain the confidentiality of the reporting employee and the investigation but may need to disclose results in appropriate circumstances; for example, in order to protect individual safety. Company will not tolerate retaliation against any employee who reports workplace violence.

Mitigating Measures:

Incidents which threaten the security of employees shall be mitigated as soon as possible following their discovery. Mitigating actions include:

- Notification of law enforcement authorities when a potential criminal act has occurred
- Provision of emergency medical care in the event of any violent act upon an employee
- Post-event trauma counseling for those employees desiring such assistance
- Assurance that incidents are handled in accordance with the Workplace Violence Prevention policy
- Requesting Elite JL Inc.'s attorney file a restraining order as appropriate

Training and Instruction:

Elite JL Inc. Human Resources Department shall be responsible for ensuring that all employees, including managers and supervisors, are provided training and instruction on general workplace security practices. Department Directors shall be responsible for ensuring that all employees, including managers and supervisors, are provided training and instructions on job specific workplace security practices.

Training and instruction shall be provided as follows:

- To all current employees when the policy is first implemented
- To all newly hired employees, supervisors and managers, or employees given new job assignments for which specific workplace security training for that job assignment has not previously been provided
- To affected employees whenever management is made aware of a new or previously unrecognized hazard

Workplace security training and instruction includes, but is not limited to, the following:

- Preventive measures to reduce the threat of workplace violence, including procedures for reporting workplace security hazards
- Methods to diffuse hostile or threatening situations
- Escape routes
- Explanation of this Workplace Violence Prevention Policy

In addition, specific instructions shall be provided to all employees regarding workplace security hazards unique to their job assignment.

Workers must sign and date this policy to ensure that this policy has been provided to them, for their review.

Workers who disregard these statutes, written policies, or safe work procedures, will be subject to progressive disciplinary action, up to and including dismissal.

This Health & Safety Policy Statement is a "general summary", and is not designed to replace the information provided in the Occupational Health & Safety Act.

Please consult the full version of the Occupational Health and Safety Act, and ensure that all legislation outlined in this act is strictly adhered to at all times.

I, _____, have reviewed the Elite JL Inc. General Policy on Health & Safety at
 Work, I clearly understand all aspects of this policy, and I will comply with this policy, as well as all aspects of the
 Occupational Health and Safety Act, in its entirety.

Employee Signature: _____ Date: _____

Copyright Material Warning

All material and documentation made available for your review, is copyrighted and protected by applicable copyright laws. You are granted access to such copyrighted works for examination and inspection purposes only. You ARE NOT authorized to reproduce, download, or distribute copies of, any copyrighted material or work that is provided by Elite JL Inc. The use, reproduction, downloading, or distribution of copyrighted materials and works may subject you to applicable penalties and damages under the applicable copyright laws. Although every reasonable effort has been made to ensure the accuracy of this material, Elite JL Inc. cannot, and shall not be responsible for consequences resulting from any omissions or errors contained herein. Elite JL Inc. assumes no liability whatsoever, associated with the use or misuse of this data.