



# **Health, Safety and Environment Manual**

## **Health, Safety and Environment**

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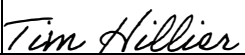














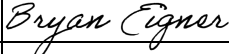
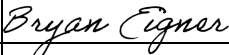
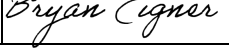
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Section 19 - Transportation - Light Vehicles

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## Health, Safety and Environment Manual Update/Review Log

DATE	SECTION	UPDATE	REVIEW	SIGNATURE
Oct 04/2017	New Manual Implementation		yes	 Paul Pinault
Oct 23/2017	Update signatures and dates	yes	yes	 Robin Martin
May 30/2018	Update to Section 6 PPE	yes	yes	 Tim Hillier
Aug 8/2018	Change to inspection frequency section 10	yes	yes	 Tim Hillier
Aug 8/2018	Inspection Policy updated and signed	yes	yes	 Tim Hillier
Oct 10/2018	Section 17 Working Alone Updated	yes	yes	 Tim Hillier
Oct 10/2018	Section 5 Incident Management changes to reflect reporting PSI's	yes	yes	 Tim Hillier
Oct 10/2018	Add Potentially Serious Incidents (PSI'S) wording throughout HSE Manual	yes	yes	 Tim Hillier
Oct 16/2018	Update signatures and dates	yes	yes	 Tim Hillier
May 15/2019	Update wording for visitors/public	yes	yes	 Tim Hillier
Aug 19/2020	Review formal hazard assessments	yes	yes	 Robin Martin
Nov 3/2020	Update Signatures and dates	yes	yes	 Robin Martin
Feb 17, 2021	Manual Review and Update Signatures	yes	yes	 Robin Martin
Sept 30, 2021	Review Formal Hazard Assessments	Yes	Yes	 Robin Martin
Jan 17/2022	Manual Review and Update Signatures	Yes	Yes	 Robin Martin
June 6, 2023	Update signatures and add to Sec. 4	Yes	Yes	 Bryan Eigner
Mar. 6/24	Update Signatures	Yes	Yes	 Bryan Eigner
Mar. 11/24	Update sections: 3,7,10, and 16	Yes	Yes	 Bryan Eigner
March 15/24	Add Mobile devices policy	yes	No	 Bryan Eigner
October 28/24	Add injury management policy	Yes	Yes	 Bryan Eigner

## Health, Safety and Environment Manual Update/Review Log

[illegible]

## Acknowledgement of the HSE Management System

I acknowledge that it is my responsibility as an employee to review and comply with Paragon Ventilation Ltd. Health, Safety and Environment Management System Manual.

As an employee of Paragon Ventilation Ltd., I will use this manual as a resource to work safely by following all company rules, safe work practices, procedures and applicable legislation.

I acknowledge that every action I take reflects on Paragon Ventilation Ltd. As a representative of Paragon Ventilation Ltd., it is my responsibility to follow policies reflecting co-operation, respect, knowledge, and integrity.

I acknowledge and accept that I alone am responsible for my safety actions and conduct. It is my responsibility to demonstrate good working relations with other employees, owners and prime contractors.

Use of this Health, Safety and Environment Management System throughout all Paragon Ventilation Ltd. operations is required to ensure that standards, policies and practices are applied consistently to all aspects of our business.

By signing this document, I agree to follow Paragon Ventilation Ltd. Health, Safety and Environment Management System.

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Employee/Subcontractor Name (Print)

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Employee/Subcontractor Signature

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Manager or Supervisor

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Date

## Disclaimer

The Health, Safety and Environment Management System detailed in this publication includes the policies and procedures for Paragon Ventilation Ltd. and its affiliates and is applicable within all organizations except where prime contractor or legislation require more stringent measures.

## Acronyms/Abbreviations/Terms

The following acronyms, abbreviations or terms are used throughout this manual:

**BBO** – Behavioral Based Observations

**COR** – Certificate of Recognition

**ERP** – Emergency Response Plan

**HSE** – Health, Safety and Environment

**HSE-MS** – Health, Safety and Environment Management System

**IMS** – Incident Management System

**JHA** – Job Hazard Analysis

**LOTO** – Lock Out/Tag Out

**LTIF** – Lost Time Injuries Frequency

**LWC** – Lost Workday Cases

**MOC** – Management of Change

**MTC** – Medical Treatment Case

**OH&S or OHS** – Occupational Health & Safety

**PPE** – Personal Protective Equipment

**PSI** - Potentially Serious Incident

**RWC** – Restricted Work Case

**SSEP** – Site Specific Environmental Plan

**SWP** – Safe Work Practice

**TDG** – Transportation of Dangerous Goods

**TRIF** – Total Recordable Injury Frequency

**WCB** – Workers' Compensation Board (Alberta)

**WHMIS 2015** – Workplace Hazardous Materials Information System 2015

**CSTS 2020** - Construction Safety Training System 2020

## Health and Safety Policy

Paragon Ventilation Ltd. Health Safety and Environment Management System demonstrates our commitment to protect and promote the safety and well-being of employees, visitors/public, communities and the environment.

We are committed to act responsibly and proactively on environmental, social, health and safety issues. All business will be conducted in a manner that is consistent with the values and behaviors expressed in the Policies and Procedures.

In fulfilling this commitment to protect persons, equipment, materials and environment, Paragon Ventilation Ltd. will:

- Provide and maintain a safe and healthy work environment, in accordance with industry standards and in compliance with legislative requirements.
- Strive to eliminate or control any foreseeable hazards which may result in property damage, accidents, personal injury/illness, or harm to an employees Physical, Psychological, and social well-being.
- Employ personnel with knowledge, skills, training, and equipment required to complete their job in a safe and satisfactory manner.
- Utilize practices and procedures which meet regulatory or recognized industry standards.
- Minimize and prevent occupational injuries and illness, through proper work planning, health and safety training, hazard identification, inspection and incident investigation.
- Establish policies, practices and procedures that are compliant with applicable legislation, regulatory requirements and recognized industry best practices.

Encourage the active involvement and support of employees at all levels within the organization in promoting and implementing an effective Health, Safety and Environment Management System.

Senior and Middle Management will ensure and enforce compliance with all policies, procedures and applicable legislation. Compliance will be achieved through leadership, mentor-ship and resource allocation.

Supervisors will ensure a safe working environment by promoting the Health, Safety and Environment Management System through effective leadership, mentor-ship and training of all employees.

Workers and Sub-Contractors are responsible and accountable for providing a safe working environment by actively demonstrating safe work behaviors and positive attitudes.

All employees share the company's genuine commitment to health and safety, supported by a firm, fair and consistent enforcement of policies.

Active participation in the Health, Safety and Environment Management System will assist Paragon Ventilation Ltd. in achieving the objective of zero injury. Paragon Ventilation Ltd. is committed to providing a positive and safe work environment for everyone.



\_\_\_\_\_  
President

June 19, 2025

\_\_\_\_\_  
Date

## Acknowledgement of Alcohol and Drug Policy

All employees are expected to work together for the safety of all Paragon Ventilation Ltd. work sites by complying with the following Alcohol and Drug Work Rules.

### Alcohol and Drug Work Rules

- No employee shall distribute, possess, consume or use alcohol, legal or illegal drugs on any company work site.
- No employee shall report to work or be at work under the influence of alcohol or drugs that may or will affect their ability to work safely.
- No employee shall test positive for any alcohol or drugs at concentrations equal to or in excess of the concentrations set in the Alcohol and Drug Program.
- No employee shall misuse prescription or non-prescription drugs while at work. If an employee is taking prescription or non-prescription drug for which there is a potential unsafe side effect, they have an obligation to report it to their supervisor.

If any employee has concerns about alcohol or drugs for themselves or another employee, they will raise the concern with their supervisor.

### Confidentiality and Record Keeping

All alcohol and drug test results will be maintained in a secure manner and will be released only to management of Paragon Ventilation Ltd. Confidential information from a Substance Abuse Professional will be handled in accordance with Personal Information and Privacy Legislation, Health Information Legislation and Canadian Human Rights Legislation. Information such as type of substance, quantity or addiction shall not be disclosed to any other party at any time.

### Acknowledgement

All employees will acknowledge they are aware of Paragon Ventilation Ltd. Alcohol and Drug Program Work Rules. Management shall respect the protection surrounding the collection, use and disclosure of personal information about employees by ensuring confidentiality of information and ensuring employees be treated with dignity and respect in the application of the Alcohol and Drug program.

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Employee/Subcontractor Name (Print)

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Employee/Subcontractor Signature

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Manager or Supervisor

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Date



## Workplace Violence and Harassment Policy

It is the policy of Paragon Ventilation Ltd. to provide all its employees a work site free of harassment and violence. **There is a Zero Tolerance Policy with workplace violence, harassment, or bullying.**

Paragon Ventilation Ltd. is committed to ensure that all employees feel safe and are provided with all the opportunities to succeed.

Paragon Ventilation Ltd. recognizes the potential for workplace violence, harassment, bullying or other aggressive behaviors directed at employees working on Paragon Ventilation Ltd. behalf. Paragon Ventilation Ltd. will not tolerate inappropriate conduct or abusive behavior directed at any employee. Paragon Ventilation Ltd. will act fairly, swiftly and decisively to protect employees from workplace violence, harassment or bullying. Complaints will be investigated swiftly with respect for the confidentiality and sensitivity of the situation.

Last reviewed by JHSC- Aug. 18, 2022



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President

June 19, 2025

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Date

## Discipline Policy

### Purpose

The purpose of this policy is to establish a framework for applying and documenting employee corrective action. The intended purpose of employee corrective action is to provide an employee feedback and advanced notice of inappropriate, or unsatisfactory work-related conduct or performance in order to afford the employee an opportunity to correct or improve their behavior or conduct should there be an issue.

This policy also protects employees from injuries associated with failure to follow safe work practices, safe work procedures and guidelines as set out in Paragon Ventilation Ltd. Health, Safety and Environment Management System Manual.

### Scope

This policy applies to all Paragon Ventilation Ltd. employees.

### Corrective Actions and Progressive Discipline Sequence

Over the course of a person's employment, there may be times when an employee's actions or conduct does not meet the expectations of Paragon Ventilation Ltd. This policy outlines a series of corrective actions that are available to management and supervisors to ensure that employees are given the opportunity to improve less than acceptable conduct and performance. The available steps include: Coaching and Counseling, Verbal Warning, Written Warning, Final Written Warning and Termination. Although corrective action may be described as progressive in nature, the corrective action steps undertaken may vary depending on the nature of the problem or the circumstances. Depending on the circumstances specific to the individual situation or past work history, the process may be accelerated or steps in the progressive discipline sequence may be skipped.

Any corrective action should reflect the seriousness of the conduct and may involve some combination of the following stages in this progressive discipline sequence:

**Coaching/Counseling** – This is often most effective when done informally and, in the event of unsatisfactory behavior or work, is necessary so that the employee realizes what is expected in terms of improvement. Ideally, counseling is conducted before the misconduct or work performance problem reaches a serious level. Counseling may be provided more formally with a supervisor or other third party sitting down and discussing the performance with the employee if necessary. Counseling with employees relative to personal problems should be avoided. Professional counseling is more appropriate when alcohol, drugs or personal problems are the source of an employee's work-related problem.

**Verbal Warning** – Is a formal meeting between an employee and their supervisor or other management representative to discuss a work-related performance or conduct issue and the action to be taken to correct the problem. Employees should be informed that the verbal warning is disciplinary in nature and that failure to improve will result in further discipline. Formal documentation of corrective action begins with this step.

**Written Warning** – Is a meeting, usually subsequent to a verbal warning, between an employee and their supervisor or other management representative, to discuss a persistent work-related performance or

conduct issue and the action to be taken to correct the problem. A plan of action may be prepared to correct the problem specifying a date on which progress will be reviewed. Employees should be informed that this warning is disciplinary in nature and that failure to improve will result in further discipline up to and including termination.

**Final Written Warning** – In most circumstances this is the final step before terminating the employee. Here a supervisor or other management representative communicates to an employee in writing the unacceptable behavior or conduct including specific improvements required and a time frame for making these improvements. The employee will also be informed that consequences of inadequate improvement in their performance and conduct will result in the termination of employment.

To ensure that a final written warning is appropriate and uniformly applied, management must approve this action prior to meeting with the employee.

Prior to an employee being removed from a final written warning, the supervisor should consult with the management. If an employee is removed from being under a final written warning, the supervisor should forward supporting documentation to management to be placed in the employee's personnel file.

**Termination** – For very serious misconduct, termination may be the appropriate first step. However, in most cases termination is imposed when other attempts to correct the problem, and less severe forms of corrective action have failed. Management must approve this action prior to meeting with the employee. Management should attend the termination meeting with the employee and their supervisor.

**Examples of Serious Misconduct** – These instances would be in cases when the behavior of the employee is sufficiently damaging to Paragon Ventilation Ltd. for Paragon Ventilation Ltd. to have "just cause" to terminate an employee without notice or pay in lieu of notice. These infractions are serious in nature and include things like theft, falsifying records or information, failing to work in a safe manner and fighting.

**Modifications** – Supervisors with the approval of management, may modify the above steps of progressive discipline sequence to reflect the circumstances including the employee's seniority or employee's employment history. Modifications include additional warnings and accelerated corrective action as appropriate.

## **Procedure**

### ***Approvals***

When corrective action is not appropriately documented or is not consistent or unfairly applied, it can expose a company to significant legal liabilities including claims for wrongful dismissal. Therefore, management must approve, in advance, any final written warning or termination.

### ***Documentation***

With the exception of counseling, each step must be fully documented, utilizing Paragon Ventilation Ltd. Corrective Action Report and forwarded to management to be included in the employee's official personnel file. The Corrective Action Report should be signed and dated by the employee and their supervisor. The employee should also be given the opportunity to provide comments on the document.

All employee requests to obtain a copy of their corrective action document(s) should be forwarded to management.

In the event an employee indicates that they will not sign the document during the meeting, the supervisor should note that fact on the Corrective Action Report and sign their name in the presence of a witness. The witness should preferably be a member of the management team.

### ***Investigations/Suspensions***

Supervisor will conduct an investigation of all serious infractions and recommend the appropriate corrective action to management. Suspension with pay of the employee under suspicion is usually the preferred immediate action until an investigation is completed. Such investigations should be timely. Ordinarily, an investigation should not take more than five (5) business days.

### ***Extenuating Circumstances***

There may be occasions when a situation occurs and there is no one to assist the supervisor in the corrective action process. Further, some serious circumstances may require immediate action. Under these circumstances, the priority for the supervisor is the immediate safety of all employees. In such cases, the supervisor should immediately suspend the subject employee until an investigation can determine the circumstances of the episode. The supervisor should inform the subject employee with a witness present if at all possible. The subject employee should be escorted off company premises or, if applicable, the police called and the employee taken into custody. Once the employee is confirmed off the premises, the supervisor should ask for written witness statements from all those witnessing the alleged act and the subsequent suspension.

### ***Employee Compensation***

Corrective action meetings will be held during the employee's established working hours and on company premises. Meetings will not be held during break times, lunch periods or any other paid rest time given to the employee.

In the event the employee is paid on an hourly basis and if business dictates that corrective action meetings occur before or after the employee's established working hours, the employee will be compensated for the period of time spent in the meeting.

### ***Confidentiality***

Any discussion or documentation involving corrective action of an employee must be held strictly confidential and only be given to, and used by, appropriate decision-makers on a need-to-know basis. All original documentation must be forwarded to management to be maintained in the employee's personnel file.



\_\_\_\_\_  
President

June 19, 2025

\_\_\_\_\_  
Date

## Anti-Bribery and Anti-Corruption Policy

### Purpose and Scope

The intent of this Anti-Bribery and Anti-Corruption Policy is to confirm Paragon Ventilation Ltd. commitment to full compliance by the company, its affiliates, and its officers, directors, employees, and agents with Canada's Corruption of Foreign Public Officials Act and any local anti-bribery or anti-corruption laws or entities we are contracted under that may be applicable. This policy supplements any existing standards within the company regarding business conduct and ethics and provides guidelines for compliance with the Canada's Corruption of Foreign Public Officials Act and company policies applicable to Paragon Ventilation Ltd. operations.

Paragon Ventilation Ltd. is committed to utilizing an effective approach to the management of risk in business with regard to bribery and corruption in its activities in Canada. Paragon Ventilation Ltd. has a zero tolerance principle for bribery and corruption and requires all company employees, including officers, directors (collectively referred to as "Paragon Ventilation Ltd. personnel") and third parties (see Definitions) at all times to act and comply with this principle by fully conforming to all procedures and policies adopted by the company to prevent bribery and corruption at Paragon Ventilation Ltd.

### Definitions

**Bribery** – Is an act of directly or indirectly giving, offering, or agreeing to give or offer, a loan, reward, advantage or benefit of any kind to, or for the benefit of, a third party (see Definitions) in order to obtain or retain some advantage; or, an act of giving, offering or agreeing to give or offer with the intent that a person who is trusted to or expected to act in good faith or with impartiality will perform that function improperly. For the purposes of this policy bribery will include kickbacks (see Definitions) known to be initiated by the payee, the payer or both.

**Corruption** – Is an act of dishonestly obtaining, offering, or giving an advantage from or to a third party (see Definitions) or company employee by abusing an entrusted power for private gain, being monetary, material, status, information or any other tangible or intangible benefit.

**Kickback** – Is the payment, promise to pay, or the authorization of the payment of a portion of contract consideration to a person employed by or associated with another contracting party. This includes the improper utilization of sub-contracts, purchase orders, consulting agreements or gifts to channel payments to principals, employees, or other representatives of another contracting party, or to their relatives or business associates.

**Public Official** means:

- Any person employed or appointed by a government, state, province, municipality, or public international organization.
- Any owner, director, officer or employee of an organization that performs a governmental function.
- Any person employed or appointed by an agency, department, corporation, board, commission or enterprise that is controlled by a government, state, province, municipality, or public international

organization. Any person acting in an official capacity for a government, state, province, municipality, or public international organization, or for an agency, department, corporation, board, commission or enterprise that is owned, in whole or in part, or controlled by a government, state, province, municipality, or public international organization.

- Any person acting for or on behalf of a government, state, province, municipality, or public international organization, or for an agency, department, corporation, board, commission, or enterprise that is owned, in whole or in part, or controlled by a government, state, province, municipality, or public international organization.
- Elected officials, candidates for public office, political parties, and offices, employees, representatives and agents of political parties.

**“Third Party” or “Third Parties”** - Includes representatives of Paragon Ventilation Ltd. whom act on or behalf of the company before or with, or whom may be reasonably expected to have contact, directly or indirectly, with public officials (see Definitions); and also includes, intermediaries, external consultants, contractors, brokers, distributors, suppliers, joint venture partners, lobbyists, activists, and any other acting for or providing services to, Paragon Ventilation Ltd.

## **Responsibilities**

The Senior Management has overall responsibility for the promotion and dissemination of an anti-bribery and anti-corruption policy.

- This policy is communicated to all Paragon Ventilation Ltd. personnel and is implemented in full, and that appropriate procedures are put in place to ensure the communication of, and implementation of, this policy with, third parties and volunteers.
- Paragon Ventilation Ltd. personnel have the necessary training in order to comply with their obligations.
- Appropriate legal and disciplinary action is taken against the perpetrators of any actual or attempted corruption or bribery.
- Recommendations for control improvements following any investigations are properly implemented.
- Guidance is provided on the measures to be taken by managers in order to implement this policy.
- Arrangement for reported incidents of actual or suspected corruption or bribery to be promptly and appropriately reported, and investigated in conjunction with the appropriate managers.
- Arrangement, where applicable, of internal audits for the prevention and detection of processes and internal controls put into place by management.
- Review and monitor compliance with this policy and update it as necessary, and as applicable, in accordance with the Paragon Ventilation Ltd. standards, applicable laws and current best practice for Canadian private organizations.
- The Manager is fully engaged in all investigations into the suspected occurrence of any actual or attempted acts of corruption or bribery unless the managers involvement with the occurrence is suspected.

Management at Paragon Ventilation Ltd. are responsible for, within their areas of accountability:

- Assessing the types of corruption and bribery risk involved in the operations of their relevant departments.
- Ensuring that an adequate system of internal control exists and that these controls are effective.
- Regularly reviewing these control systems to ensure compliance and to satisfy themselves of the system's continued effective operation.

The manager is responsible for being fully engaged in any investigation into non-compliance with this policy unless actions taken by the manager resulted in the necessary initiation of an investigation by another Paragon Ventilation Ltd. personnel and third parties are required to report to their superior or primary point of contact any and all suspicion of corruption or bribery including that which is outlined as Suspect Indicators below.

### **Suspect Indicators**

Unusual events or transactions may be symptoms of corruption or bribery. The required system of internal control within a Paragon Ventilation Ltd. area of accountability must monitor for the following events and conditions and indication of their existence must be reported to the owner and an investigation initiated immediately:

- Unusual or inadequately documented payments
- Purchases which have not passed through Paragon Ventilation Ltd. standard procedure for obtaining estimates or purchasing
- Excessive rates of remuneration paid to consultants
- Use of government officials as consultants or the provision of travel grants to government officials
- Excessive fuel usage for vehicles
- Sale of assets to Third Parties which do not follow customary Paragon Ventilation Ltd. procedures

### **Standards**

The company, Paragon Ventilation Ltd. personnel and third parties shall not, either directly or through any intermediary:

- Demand, solicit or accept a bribe as an act of bribery.
- Engage in any corrupt activities as defined as acts of corruption.
- Meet the conditions above unless:
  - The act is a service or fee for routine government actions which would otherwise be lawful and proper.
  - The employee or Third Party engaged in the activity believes their health or safety to be at imminent risk and believes the payment to be absolutely necessary to preserve their health or safety.

The activity is reported to the concerned superior, together with the owner, and is properly recorded in reasonable detail which accurately and fairly reflects any transactions made and includes such information as the quantity, nature, and purpose of such payment, offer or acceptance of entertainment, gifts, favours, hospitality, or reimbursement of travel or other expenses that renders one in non-compliance with this policy, any other policy or standard of the company, or the policies of the employers of any others engaged in the offer or acceptance.

## **Training**

All Paragon Ventilation Ltd. personnel and third parties will be made aware of the content of this policy prior to engaging in any work on behalf of the company. Due diligence must be exercised in order to ensure a thorough understanding of the provisions of this policy and follow-up through systems of internal control is conducted of the training and compliance with the content of this policy.



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**President**

June 19, 2025

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**Date**



## Incident Management Policy

### Purpose

This policy is to enable the detailed instructions and directive regarding post incident activities.

Paragon Ventilation Ltd. will ensure that all incidents are investigated to determine steps to be taken to prevent recurring incidents from the same or similar hazards.

This policy is based on three facts:

1. Incidents are caused.
2. Incidents are prevented if cause is eliminated.
3. If causes are not eliminated, incidents will happen again.

Corrective actions will be taken to address substandard conditions and behaviours that may have contributed to the occurrence of the incident and the severity of the incident. Incidents to be reported and investigated, based on management direction are:

- Near misses/Potentially Serious Incidents (PSI'S)
- First Aid and Medical Aids
- Equipment and property damage
- Environmental spills or environmental contamination
- Occupational Illnesses
- Work Refusals

Supervisors are responsible for conducting a preliminary investigation and recording the findings. For more serious incidents the supervisor is responsible to ensure that the Senior Management is contacted. The Senior Management must ensure investigations are conducted, the causal factors are identified, the root cause is identified and corrective actions are assigned to persons having the authority to act.

Incidents will be reported to governmental agencies and departments where required by legislation.

Incidents will be reported to clients in accordance with client requirements.

Injury incidents will be reported, documented and forwarded to the Workers' Compensation Board as per the Workers' Compensation Board Act.



\_\_\_\_\_  
President

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June 19, 2025

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Date

# Injury Management Policy

At Paragon Ventilation Ltd. our goal is to provide an injury-free workplace, however, if an Injury does occur Paragon utilizes modified work to assist in worker recovery.

If you are injured at work, and the injury is substantial enough that it requires treatment off site, you must visit an OIS clinic or have the treating physician at a non-OIS clinic complete a Fitness for work form. This form must be turned into Paragon so any restrictions to worker duties can be observed.

If the treating physician determines that a worker is not able to perform regular duties but can still work; light duty or modified work will be implemented whenever possible.

For modified work, Paragon will determine what tasks are possible for the worker to perform given the restrictions from the treating physician and present the injured employee with a modified work offer. A modified work offer is an agreement between the injured worker and the company which includes what tasks the worker will perform, what rate of pay the worker will receive, and the duration of the agreement. If the worker refuses the agreement without reasonable cause, they will forfeit their right to wages from Paragon and WCB.

Modified is not required to include a sheet metal worker scope of work, any meaningful task that keeps the employee active in the workplace and does not hinder their recovery can be used. In the past we have used tasks such as: Training updates, Painting, Cleaning, Fire Watch, Documentation review etc.

The injured worker cannot return to regular duties until the treating physician determines they no longer have any restrictions.



President

June 19, 2025

**To: All Employees**

**RE: Company Vehicles**

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A number of years ago, our Insurance Company had asked that we develop policies and guidelines regarding the safe operation of our company vehicles. Our expectation is that all company vehicles are driven according to traffic laws, and in a safe and courteous manner. Any employees who do not will be held accountable for their actions. In addition to the above:

1. NO driver under the age of 25 is to drive any company vehicle unless approval from management has been provided.
2. Company vehicles are to be used for company business only - personal use is strictly prohibited.
3. In the event of a Journeyman/Apprentice working together, the Journeyman will be required to drive the company vehicle.
4. Our insurance company will be requesting regular driver's abstracts, and will be notifying us of any "problem" drivers:
  - Employees with a serious conviction (impaired driving, careless driving, driving while suspended) will be immediately disqualified from driving a company vehicle.
  - Employees with 4 moving violations (speeding tickets or at-fault accidents) in the preceding 3-year period will be disqualified from driving any company vehicle.
  - Employees who have a questionable driving record may also be disqualified from driving a company vehicle.
5. Any employee who drives a company vehicle, or is on company business whatsoever, while under the influence of alcohol or narcotics will be immediately disqualified from driving a company vehicle, and may also be considered for dismissal.
6. Any safety concerns regarding the company vehicle are to be immediately reported to the employee's supervisor, and appropriate steps taken to ensure the continued safe operation of the vehicle.

Any driver involved in an accident with a company vehicle, regardless of fault, must remain at the scene of the accident and obtain the following information:

- The name, address, and driver's license number of any other drivers who may be involved. In addition, the name of any passengers, and any witnesses to the accident.
- The name of the owner of the other vehicle(s), if different from the other driver.
- License plate number of every vehicle involved in the accident.
- The name of the Insurance Company, the policy number, and the expiration date of insurance for every vehicle involved in the accident.
- A diagram of the accident scene.
- Take several of pictures from your cell phone camera

The employee's immediate supervisor must be notified of all accidents as soon as possible, along with the appropriate authorities.

If you have any questions, please direct them your immediate supervisor.

Thank you for your cooperation.



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President

June 19, 2025

Date

## Communications and Training Policy

### Purpose

Communications and Training at all levels of the company is a vital component of the Health, Safety and Environmental Management System. Paragon Ventilation Ltd. will address and evaluate program performance annually along with the goals and objectives pertaining to the HSE-MS program improvements. The communication component will be delivered using the following:

- Employee Meetings
- Hazard Assessment and Control
- Safety Meetings
- Industry-specific bulletins and company memorandums
- Post-incident reviews
- Learning from incidents
- Work site Inspections

Training will include:

- Orientation
- Specialized PPE
- Emergency response
- Hazards present on the work site
- Task specific training as and when required

Prior to commencing work or tasks, employees must review and acknowledge the job-related activities, duties and responsibilities. This could be in the form of company specific, client specific, and site specific orientations.

If any employee is in doubt about their safety role or responsibilities, they are to contact their supervisor for clarification before starting or continuing any work-related activities.

Supervisors have the responsibility to ensure employees are competent to undertake the task safely and follow correct procedures.



\_\_\_\_\_  
President

\_\_\_\_\_  
June 19, 2025

\_\_\_\_\_  
Date

## Personal Protective Equipment Policy

### Purpose

Paragon Ventilation Ltd. is committed for ensuring all employees adhere to the Personal Protective Equipment Policy as per legislation and other regulatory requirements. Paragon Ventilation Ltd. will confirm that the use of Personal Protective Equipment does not itself endanger the employee.

Paragon Ventilation Ltd. is responsible for ensuring employees are aware of the necessity of Personal Protective Equipment and appropriate clothing that is in accordance with CSA Standards. Personal Protective Equipment will be provided when considered necessary due to the specific demands of on-site job conditions. The Hazard Assessment and Control, as well as the Safe Work Practices and Procedures and Codes of Practice, can be used to determine the necessary type of Personal Protective Equipment to be worn.

Employees are responsible for adhering to the requirements for proper use, care, maintenance and storage of Personal Protective Equipment, and training in these areas will be carried out. The Supervisor will instruct employees to select and use equipment appropriate to the hazards on the work site and to follow the manufacturer's specifications for the fitting and wearing Personal Protective Equipment.

It is essential that employees understand the situations which require Personal Protective Equipment and safety equipment. Employees will not use equipment that is not in safe working condition to perform the function for which it was designed. Personal Protective Equipment that has been removed from service will be destroyed or tagged "Out of Service." Any Personal Protective Equipment tagged in this way will not be returned until it is repaired and inspected by a qualified competent person.

Employees have the responsibility to wear and use the correct Personal Protective Equipment as intended and within its limitations or capacity.



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President

June 19, 2025

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Date

## Preventative Maintenance Policy

### Purpose

This policy is to ensure all tools, equipment, vehicles and office equipment used by Paragon Ventilation Ltd. employees are properly maintained according to manufacturer's specifications and regulatory standards to reduce or eliminate the potential losses from hazards arising from defects.

Paragon Ventilation Ltd. is committed for creating a safe working environment, including supplying the correct tools and equipment for the task. Employees will take full responsibility for the proper and safe use of tools and equipment. It is essential that tools and equipment be operated in a safe manner and not be tampered with in any way.

All tools and equipment will be properly maintained in order to reduce injury to employees or damage to property. Supervisors will guarantee that only qualified, competent persons carry out all maintenance work and all records are to be maintained and kept on file for three years.

Any tool or equipment found to be defective will be removed from service and clearly tagged "Out of Service" for either repair or disposal.

Vehicles must be inspected for operational and safety defects daily using the specified documents. Defects or damage found through inspection or operation must be reported as soon as possible. Vehicle logs must be updated daily and any repairs or maintenance work must be signed off by the competent person doing the work.

All employees are subject to tool and equipment inspection by the supervisor.



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President

June 19, 2025

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Date

## Inspection Policy

### Purpose

Inspections are a critical part of a comprehensive Health, Safety and Environment Management System. They assist in controlling losses to individuals, equipment, materials and the environment through identifying and correcting unsafe conditions, events, acts and behaviours.

Monitoring includes locating hazards that could cause injury or damage and developing plans for corrective action. If inspection deficiencies are not analyzed for causes, core problems will usually not be addressed.

There are two classifications of inspections to be completed in the workplace:

- **Formal Inspections** – Planned inspections that use established procedures, checklists and are often on a set schedule.
- **Informal Inspections** – Ongoing inspections not on a set schedule, procedure or definitive checklist (such as the visual inspection of Personal Protective Equipment).

All formal inspections will be documented and the information retained for three years. Paragon Ventilation Ltd. will identify deficiencies and implement corrective action.



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President

June 19, 2025

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Date



## **Health and Safety Policy**

### **Mobile Devices on Worksites**

#### **Purpose**

The purpose of this policy is to establish a procedure to reduce injuries directly or indirectly related to using mobile devices on worksites. There are many hazards associated with using mobile devices on a worksite. It can distract users from the hazards associated with their work tasks and their surroundings, and it can distract other workers in the area.

Restricting the use of mobile devices on a worksite will increase the level of concentration of workers. If workers are more focused on their job, the quality of their work will improve and the number of incidents associated with the distractions caused by using mobile devices will decrease.

#### **Application**

This policy applies to all workers and visitors hired/contracted by Paragon Ventilation.

#### **Types of Mobile Devices**

This policy includes all mobile devices including, but not limited to, smart phones, smart watches, ear buds, headphones, cell phones, tablets, notebooks, MP3 players, iPod's etc.

#### **Company Rules**

- Only those individuals authorized by Supervision are permitted to use mobile devices on worksites. The use of mobile devices on site is prohibited unless expressed consent is granted by Project Management. This includes talking, texting, emailing, playing games, etc.
- The use of mobile devices is not permitted while operating any vehicle or equipment (including mobile material handling equipment), while working on any aerial work platforms, or while performing work activities.
- The use of mobile devices is not permitted while attending safety meetings or while receiving safety-related information such as a toolbox talks.
- Supervisors should make every reasonable effort to avoid using their mobile device or making calls while directing activities on the worksite.
- The use of mobile devices is not permitted around explosive or flammable atmospheres or while decanting or working with flammable or combustible material.

- If an urgent family matter requires a worker to use their mobile device, the worker must coordinate with the supervisor prior to using the mobile device so that the communication can be done in a safe manner.

### **Permitted Uses**

- Workers are permitted to use mobile devices when they are in designated safe areas at break times:
- Supervisors are permitted to use mobile devices in the construction trailer, in the site office, or at a designated safe area.
- Supervisors are permitted to use mobile devices on site when expressed consent is provided by Project Management.

### **Discipline**

Anyone who violates this policy will be subject to disciplinary measures, up to and including dismissal, depending on the circumstances.

### **Employee Acknowledgment**

I acknowledge that I have read and understood and will abide by the terms of this policy regarding the use of mobile devices at work.

Name (printed) \_\_\_\_\_

Signature \_\_\_\_\_ Date \_\_\_\_\_

## Section 1 – Organization and Responsibilities

### Purpose

The purpose of this section is to clearly describe and inform employees of their assigned responsibilities and accountabilities within the Health, Safety and Environment Management System (HSE-MS).

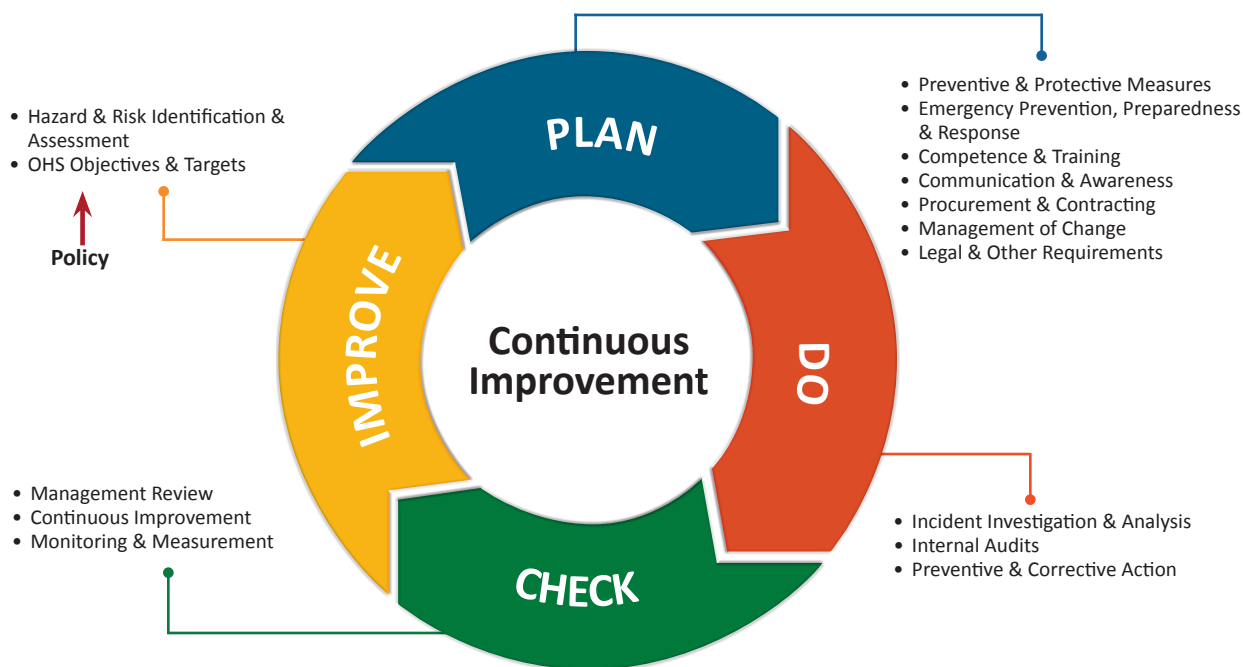
### Definitions

**Internal Responsibility System** – The IRS is a system within an organization where everyone has direct responsibility for health and safety as an essential part of his or her job. It does not matter who or where the person is in the organization, they achieve health and safety in a way that suits the kind of work they do. Each person takes initiative on health and safety issues and works to solve problems and make improvements on an ongoing basis.

### General

Paragon Ventilation Ltd. expects the all employees to be actively involved in the HSE-MS by adhering to their roles and responsibilities.

The Internal Responsibility System is built on the premise that all employees play a role in the implementation of the HSE-MS within the organization. A system developed to establish responsibility sharing, promote best practices and a safety culture that helps develop self-reliance while ensuring compliance.



## Position Description

Each person is responsible for health, safety and environmental protection. All employees are to know their roles and comply with the requirements of their job description. The following positions are used in the HSE-MS.

- Senior Management
- Management
- Supervision
- Employees

## Roles and Responsibilities

### *Senior Management*

Senior Management responsibilities within the HSE-MS include, but are not limited to:

- Lead, plan, direct and support safety initiatives and activities.
- Provide strategic direction on the HSE-MS by setting and communicating annual health, safety and environment goals and objectives.
- Allocate sufficient resources to ensure the safety and protection of management, supervisors, employees and sub-contractors on the work site.
- Ensure a hazard assessment and control process is in place to identify and control hazards on the work site.
- Ensure an effective process is in place for the development of required codes of practice, safe work practices and safe job procedures.
- Ensure an effective process is in place for the selection, use and care of personal protective equipment.
- Ensure an effective process is in place so only qualified and competent personnel supervise tasks that could endanger employees.
- Ensure a training process is in place, so all employees are qualified and competent to perform their assigned tasks.
- Ensure a competency process is in place so all employees who operate equipment are trained and competent in the safe operation of the equipment.
- Ensure an effective process is in place so all employees know their responsibilities and duties under applicable legislation, irrespective of whether they are actively engaged in work activities.
- Ensure a Disciplinary Policy is in place for management, supervisors and employees who are non-compliant with company policy and procedures.
- Ensure a preventative maintenance process is in place to confirm that all equipment used by employees will adequately perform functions it is designed to perform and is free of all defects.
- Ensure an Inspection process is in place for the inspection of premises, equipment and work practices/methods at regular/appropriate intervals.
- Participate in at least one work site inspection every quarter.
- Review investigation reports of incidents that result in near misses/potential for serious incidents.
- Participate in investigations as required.
- Ensure an effective process is in place so that any hazardous conditions identified from investigations and inspections are corrected as soon as reasonably practicable.
- Ensure a plan is in place to protect supervisors and employees in case of identified potential emergencies, including meeting the first aid requirements under the applicable Occupational Health and Safety Act.

- Ensure a process is in place to test the emergency response plans.
- Ensure an Injury Management policy/program is in place for the timely return to work of injured employees.
- Ensure an incident management process is in place to meet the reporting requirements under the Workers' Compensation Board Act, applicable Occupational Health and Safety Act and other applicable legislation.
- Review health, safety and environmental statistical trends to determine opportunities for improvement in the HSE-MS.
- Ensure an effective process is in place for the confidentiality of medical and other personal information.
- Coordinates the execution of the emergency response plan.
- Test the emergency response plan through emergency response drills.

### **Management**

Management responsibilities within the HSE-MS include, but are not limited to:

- Pre-qualify subcontractors.
- Coordinate the safety meeting process to ensure the minimum frequency of meetings is being met.
- Coordinate the use of newsletters and safety bulletins to effectively communicate safety information and concerns.
- Verify the development, updating and communication of the job task inventory and the required job hazard assessments.
- Coordinate the development of required codes of practice, safe work practices and safe job procedures.
- Support the Personal Protective Equipment (PPE) Policy by ensuring the required Personal Protective Equipment (PPE) is available to the supervisors and employees.
- Hold periodic supervisor meetings to review health and safety activities including incident trends and health and safety opportunities for improvement.
- Designate qualified and competent personnel to supervise tasks that could endanger employees.
- Determine the minimum training requirements by job title.
- Determine the minimum competency assessments required to operate different tools and equipment.
- Coordinate the inspection process to ensure the minimum frequency of inspections is being met.
- Support the supervisors in the implementation of corrective actions identified during the inspection and incident investigation processes.
- Participate in one work site inspection every quarter.
- Participate in investigations as required.
- Review reports of unsafe work for completeness including a review for timely follow through on corrective actions.
- Assist supervisors in the implementation of necessary action(s) to control and/or resolve any emergency that threatens employees.
- Develops the emergency response plans and revise the plans, if necessary.
- Coordinate the completion of the required frequency of emergency response drills.
- Coordinate the return-to-work plan for injured workers.
- Report to government agencies as required under the Workers' Compensation Board Act, applicable Occupational Health and Safety Act and other applicable legislation.

- Verify a consistent implementation of the disciplinary policy.
- Manage confidential medical and other personal information as required under privacy laws.
- Review the HSEM annually and create an action plan to address deficiencies found.

### ***Supervisor***

Supervisor responsibilities within the HSE-MS include, but are not limited to:

- Only allow prequalified sub-contractors to perform work on Paragon Ventilation Ltd. managed job sites.
- Support the successful completion/attainment of annual goals and objectives.
- Select only employees who are trained with the required skills to perform the assigned job tasks.
- Assign a mentor to new employee until a mentor determines that the employee is sufficiently trained to work alone.
- Assign a competent assessor to complete the required competency assessments on employee's ability to operate tools or equipment.
- Assess whether an employee is fit for duty prior to assigning the employee a job task.
- Verify that employees have implemented sufficient controls through the Hazard Assessment and Control process to manage hazards at risk levels as low as reasonably practical.
- Lead safety meeting agenda to ensure the communication tool is utilized as an effective tool to lead, direct and instruct employees.
- Lead, direct and instruct employees on the plan to safely complete assigned tasks.
- Communicate applicable codes of practice, safe work practices and safe job procedures to employees as an administrative control to identify and control hazards.
- Lead, direct and instruct employees on the selection, care and use of PPE.
- Select equipment or tools appropriate or suitable for the assigned tasks.
- Coordinate the preventative maintenance program through setting a schedule for maintenance of equipment, tools, vehicles, and PPE.
- Stop work immediately until appropriate control measures are in place when an identified hazard(s) could cause imminent danger to an employee.
- Verify through inspection that all requirements under HSE-MS are followed on work sites under their control.
- Participate in one work site inspection every month.
- Follow-up as soon as is reasonably practical on any unsafe or harmful condition or action.
- Lead the investigation of reportable incidents.
- Follow-up as soon as reasonably practical on action items identified as required through the inspection or investigation processes.
- Implement and support the return-to-work plan of injured workers.
- Discipline employees who are in non-compliance with company policy and procedures as a method of improving the safety performance of the work site.

### ***Employee***

Employee's responsibilities within the HSE-MS include, but are not limited to:

- Take reasonable care to protect the health and safety of yourself and others when on the work site.

- Participate in Paragon Ventilation Ltd. HSE-MS in their assigned areas of responsibility.
- Adhere to Paragon Ventilation Ltd. policies, safe work practices, safe job procedures and codes of practice for tasks.
- Arrive at work fit for duty.
- Implement sufficient controls through the Hazard Assessment and Control process to manage hazards at risk levels as low as reasonably practical.
- Wear the required PPE.
- Participate in safety meetings to create a healthy two-way communication of safety related topics and concerns.
- Recognize their right to refuse unsafe work when they believe a hazardous condition exists and report the condition to the supervisor or management immediately.
- Participate in inspections as required.
- Participate in investigations as required.
- Perform pre-use inspections of tools and equipment.
- Remove from service and tag any tools, equipment, structures and PPE with major defects.
- Only operate tools and equipment that one is qualified to operate.
- Report all hazards, unsafe conditions, near misses/potential for serious incidents and any other incidents immediately to your supervisor.
- Not start work unless one is familiar with their responsibilities in the event of an emergency.
- Cooperate with all requirements of the Emergency Response Plan (ERP).
- Participate in emergency response drills as required.
- Support the return-to-work plan, if injured on the job site.

### ***Supplier***

Supplier's responsibilities within the HSE-MS include, but are not limited to:

- Ensure, as far as practical, that any tool, appliance or equipment supplied is in safe operating condition and is appropriate for the purpose it was purchased for.
- Ensure that all equipment supplied meets manufacturer specifications, legislation, and all other applicable standards (CSA, ANSI etc.).
- Ensure that all controlled products are accompanied by a Safety Data Sheets (SDS) and any other supporting documentation.

### ***Visitor***

Visitor's responsibilities within the HSE-MS include, but are not limited to:

- Report to the Paragon Ventilation Ltd. supervisor of the office/shop/worksite.
- Follow instructions given by the supervisor.
- Wear PPE as directed by the supervisor.
- Attend a site-specific orientation as directed by the supervisor.
- Always remain within line of sight of authorized personnel while on the work site.

### **Public**

Protecting the public is of utmost importance, and all levels/roles must prioritize this when planning and executing work. This is done by ensuring that:

- Permits are in place for working in public spaces.
- Barricades and traffic control devices are in place.
- Signage is posted clearly stating access restrictions/alternate routing.
- Flaggers/spotters to direct traffic/people.

If a member of the public is unruly and will not follow directions given, all work activities must stop. Workers are to wait for public to leave area or call security/police to have the person(s) removed prior to resuming work.

## **Right to Refuse Unsafe Work**

### **Purpose**

The purpose of the policy is to establish guidelines to resolve health and safety concerns where an employee believes there exists an “imminent danger” to the health and safety of any worker present at the work site.

Everyone has the right to refuse unsafe work. All employees, visitors and suppliers are equally responsible for complying with the requirements of the legislation.

### **Definitions**

**Imminent Danger** – A workplace hazard that puts an employee in immediate serious risk of death or physical harm.

### **Existence of Imminent Danger**

An employee shall not carry out any work if on reasonable and probable grounds the employee believes that there exists an imminent danger to the health and safety of any worker due to:

- Operation of equipment, tools, machine or device,
- Condition of the work site,
- Workplace Violence and Harassment,
- Unsafe procedure or process,
- Contravention of applicable legislation, and
- Any other hazardous situation.

### **Work Refusal Procedure**

If an employee provides notification to a supervisor or management of a refusal to work, the following procedure will be followed:

1. Work related to the unsafe condition must be stopped and remain so until the concern has been addressed and corrected.
2. Workers will evacuate from the work site to a safe location.
3. Worker will report work refusal to their supervisor as soon as reasonably practicable and the reason for the work refusal (document, if possible).
4. Investigate and take action to eliminate the imminent danger, if required.

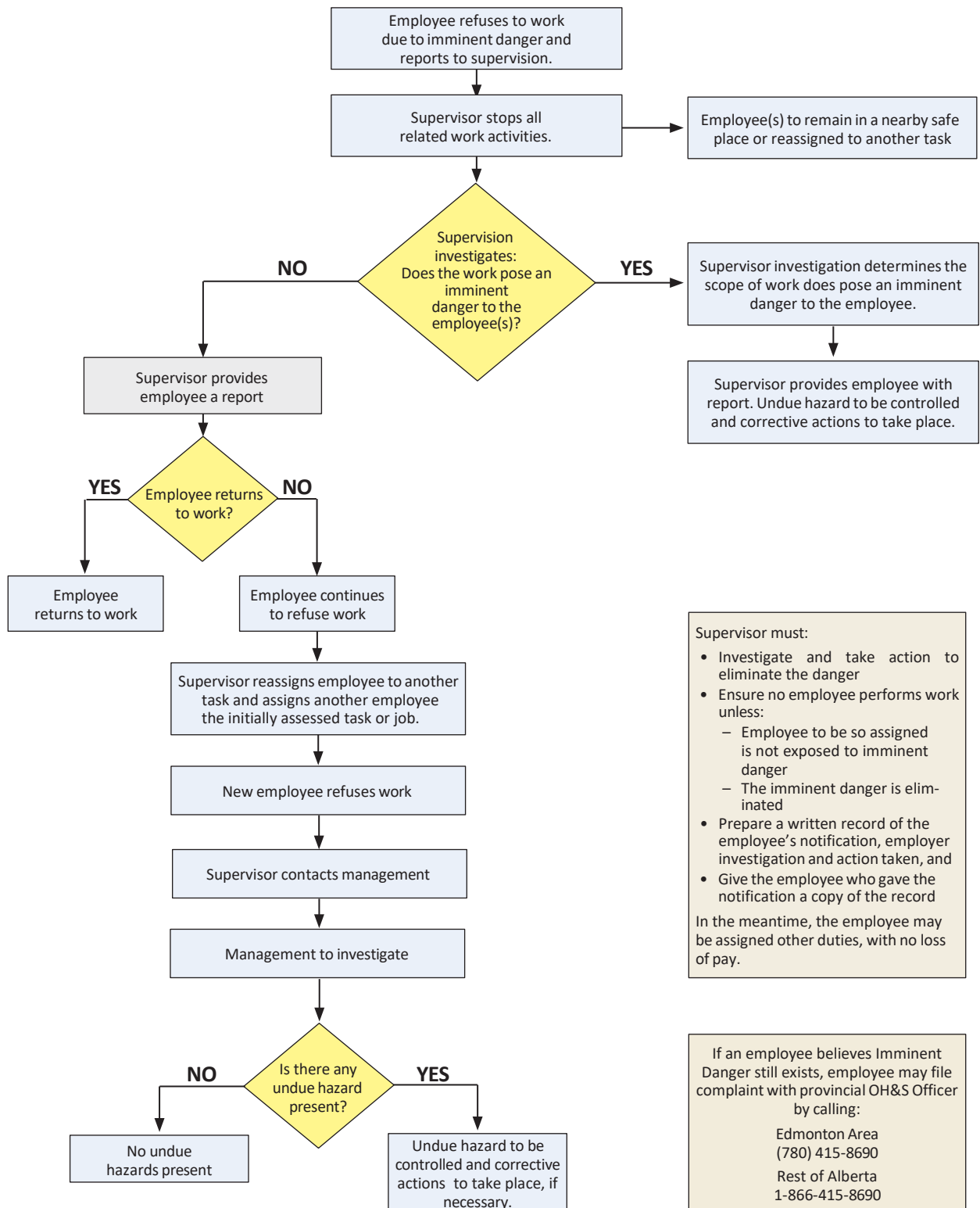


5. Conduct a hazard assessment to ensure a plan is in place to control hazards to an appropriate level of risk.
6. The supervisor will document the employee's notification, the investigation and the corrective action taken.
7. The supervisor will provide the employee who gave the notification a copy of the employee's notification, the investigation and the corrective action taken.
8. Return to work if the "imminent danger" to the health and safety of the workers has been eliminated and/or the exposure to imminent danger does not exist.

### **Reprisals Prohibited**

Any person who refuses unsafe work is protected by the applicable legislation and this policy from reprisal by management, supervisor or other employees and cannot be penalized, terminated, threatened, intimidated, coerced, disciplined or suspended as a result of the notification of work refusal.

## Refusal of Unsafe Work Process Flow Chart



## Section 2 – Subcontractor Safety Management

### Purpose

The purpose of this program is to verify that subcontractors carry out work for the company being in compliance with all company rules, safe work practices, procedures and applicable legislation meeting all the safety standards of Paragon Ventilation Ltd. HSE-MS.

### Definitions

**Contract** – A legally binding agreement entered into between Paragon Ventilation Ltd. and the contractor which allows both parties specific rights and obligations within the confines of the agreement.

**Subcontractor Pre-approval** – Criteria used to evaluate a subcontractors suitability, work practices and HSE programs and processes.

**Service Agreement** – A form outlining all of the specific services and duties the contractor is required to perform under contractual requirements. Also, referred to as “Terms and Conditions.”

**Direct Service Provider** – Can be referred to as a one person company without employee contracted for services and supervised by one of Paragon Ventilation Ltd. supervisors. (i.e., Rig Welder, HSE Advisors, Quality Advisor, etc.) Paragon categorizes Direct Service Providers as employee in the administration and implementation of Paragon Ventilation Ltd. HSE-MS.

**Low Risk Subcontractor** – A subcontractor that, through their actions or service, would create a low risk for HSE activities to the facilities (i.e., custodial staff, contract security, administrative contract services, etc.)

**3rd Party Approval** – A certified, recognized organization that reviews companies, HSE performance and systems that is equal to Paragon Ventilation Ltd. approval process and checklist. (i.e., CanQual, ISNetworld).

**Subcontractor** – A person, partnership or group of people retained by Paragon Ventilation Ltd. under a contract to provide specific services under said agreement for a specific price. Services of the contractor are considered to be all functions, activities, and duties as outlined in the contract.

**Work Scope** – Outlines, and explains in detail, the description of the work or service and HSE measurements or controls.

**Work Site** – Refers to a location where a worker is engaged in performing their duties. This includes any vehicle or mobile equipment that is used by a worker engaged in work related activities.

### Roles and Responsibilities

#### *Management*

Management responsibilities when hiring and managing a subcontractor include, but are not limited to:

- Evaluate potential subcontractors through the pre-qualification process to confirm that Paragon Ventilation Ltd. HSE-MS standards are met at a minimum.
- Select only subcontractors which have been pre-qualified to work for Paragon Ventilation Ltd.
- Inform the subcontractor of any hazards or risks that could be present on the work site.

- Review the subcontractor's pre-qualifications including, but not limited to, HSE training documents, HSE statistics and trending.
- Communicate the Alcohol and Drug testing requirement to the subcontractor.
- Provide a copy of the site Emergency Response plan to the subcontractor.
- Participate in any incident investigations involving subcontractors and ensure that the incident is reported to the client as well.

### ***Supervision***

Supervision's responsibilities within the Subcontractor Safety Management include, but are not limited to:

- Only allow pre-qualified subcontractors to perform work on Paragon Ventilation Ltd. managed work sites.
- Participate in incident investigations as required including supplying Paragon Ventilation Ltd. client with a report, if necessary.

### ***Subcontractor***

Subcontractors, including Direct Service Providers are required to perform their work in a safe manner as to protect the health and safety of themselves, their employees, the employees of Paragon Ventilation Ltd., and all other individuals on the work site.

Subcontractor's responsibilities include, but are not limited to:

- Abide by their own HSE-MS, provided it is more stringent than Paragon Ventilation Ltd. HSE-MS. If the Paragon Ventilation Ltd. HSE-MS is more stringent, the subcontractor is to comply with Paragon Ventilation Ltd. HSE-MS and the applicable legislative. Companies that do not have their own health and safety program, will follow Paragon Ventilation Ltd. HSE-MS.
- Implement processes so employees adhere to all their HSE policies, codes of practice, safe job procedures, and safe work practices.
- Participate in Paragon Ventilation Ltd. HSE-MS including General Safety Orientations, if directed so by Paragon Ventilation Ltd. supervision.
- Supply a letter to Paragon Ventilation Ltd. to illustrate WCB coverage is current, in good standing and the account is not in arrears.
- Supply a certificate of Comprehensive General Liability Insurance to Paragon Ventilation Ltd. with the required level of coverage.
- Supply a certificate of Automobile Public Liability and Property Damage to Paragon Ventilation Ltd. with the required level of coverage.
- Report all incidents, injuries, motor vehicle incidents, and near misses/PSI's that occurred in the course of conducting work under the work scope outlined in the Service Agreement.

### **General Information**

Paragon Ventilation Ltd. is committed to hiring competent subcontractors and working together with those subcontractors to achieve our goal of an injury and incident free workplace.

The objectives of Paragon Ventilation Ltd. contractor safety program are to:

- Establish clearly the respective duties and responsibilities of representative and subcontractors.
- Adequately select contractors suitable for the work so that improvements in their overall performance will reflect positively in regards to safety on Paragon Ventilation Ltd. work sites.

- Ensure that consistent safety standards are being applied on all Paragon Ventilation Ltd. work sites.
- Ensure regulatory and client obligations are being properly fulfilled.

### Minimum Contractor Prerequisites

The following represents the minimum contractor prerequisite that must be in place prior to working for Paragon Ventilation Ltd.:

**Insurance** – As required by project scope.

- Commercial General Liability
- Automobile Liability

**WCB Coverage** – WCB account in good standing for the provinces in which a company operates.

**Safety Program** – Safety Program that meets or exceeds the standards set by Paragon Ventilation Ltd. HSE-MS

**COR/SECOR** – Current certification or are able to demonstrate they are working towards achieving an acceptable industry related Certificate of Recognition.

### Approved Subcontractor List

All subcontractors conducting work for the company must be on Paragon Ventilation Ltd. approved vendor list. Paragon Ventilation Ltd. maintains this list as well as pre-qualification information through a pre-qualification process.

### Subcontractor Pre-Approval Procedure

Procedure for evaluating and choosing a subcontractor:

1. Paragon Ventilation Ltd. will obtain information and evaluate according to the subcontractor's safety track record, HSE-MS, insurance, experience. If previous HSE performance records are unavailable, refer to the injury and illness rates (*WCB Rate Sheet*). For a subcontractor to prequalify, the above safety metrics will meet acceptable standards as criteria for selection.
2. Paragon Ventilation Ltd. will confirm that the subcontractor has or is in the process of obtaining Certificate of Recognition (COR/SECOR).
3. Once a subcontractor has been selected, the subcontractor will complete a Pre-Job Hazard Assessment of the work site to identify health and safety requirements and potential hazards associated with the scope of work.
4. Based on project parameters the subcontractor may be required to provide a safety management plan to outline work standards, procedures, and practices which are applicable to the work scope.
5. All subcontractors will conduct a pre-job meeting to review the scope of work, HSE risks and actions plans to control the risks. The Job Hazard Assessment and Safety Management Plan may be utilized to communicate the risks of the project.
6. During the contract work, Paragon Ventilation Ltd. will monitor the performance of the subcontractor and its employees to ensure they are working according to applicable legislation and at a minimum meeting the standard set out in Paragon Ventilation Ltd. HSE-MS.
7. Paragon Ventilation Ltd. will conduct a meeting with the subcontractor upon completion of the contract to review HSE performance during the execution of the project.

## **Monitoring**

Paragon Ventilation Ltd. will continue to monitor the subcontractor during the duration of their scope of work.

Monitoring may include but is not limited to:

- Visual observation/inspection of work being performed.
- Audits of subcontractors safety documentation.
- Quality checks of the subcontractors scope of work.

## **Revocation of Contractor Approval**

If during the on-going HSE performance monitoring Paragon Ventilation Ltd. identifies subcontractor non-compliance with the HSE-MS, the subcontractor will be notified verbally and in writing that they are in non-compliance. The subcontractor will be informed that non-compliance is grounds for termination of the contract.

If no corrective action is taken after written notice of non-compliance is provided by Paragon Ventilation Ltd., or if imminent danger exists, a stop work order will be issued and all work performed by that subcontractor within Paragon Ventilation Ltd. will cease.

The subcontractor and Paragon Ventilation Ltd. will conduct a site meeting to address the issue. Meeting minutes must be taken and continued non-compliance will result in contract termination.

## Section 3 – Hazard Assessment and Control Process

### Purpose

The Hazard Assessment and Control process is used to protect personnel from injury, occupational illness, and prevent incidents at the work site by identifying and correcting unsafe acts and conditions.

While the Hazard Assessment and Control process is concerned with real-time visible incidents and conditions, it also looks at probability and the potential for hazards that may be encountered. Hazard Assessment and Controls determine and evaluate hazards on the work site.

Paragon Ventilation Ltd. will comply with current legislation in identifying, ranking and controlling hazards throughout its business activity. The regulatory and legislative requirements are considered to be the minimum standard.

Paragon Ventilation Ltd. will ensure that employees affected by the hazards identified in a Hazard Assessment and Control process are informed of the hazards and of the methods used to control or eliminate the hazards. Paragon Ventilation Ltd. will ensure that any risk assessment completed for any task or new project will be documented and controls will be reviewed to ensure no new hazards are created. Updates to site HSE Manuals will be completed by the foreman at the quarterly safety meeting. Updates to the Online HSE manual will be completed as changes are found. Any critical task changes will be communicated to all employees via email safety flash and/or visit, review and signoff from HSE advisor or management.

### Definitions

**Hazard** – A source of harm. Substances, events, or circumstances which could lead to the damage of health, life, and/or property.

**Hazard Assessment** – A formal process to identify hazards that may cause loss or damage to people, equipment, materials, property or the environment.

**Health Hazard** – Any hazard that could result in occupational illness.

**Risk** – A measurement of the potential for harm or loss.

**Risk Analysis** – A process for comprehending the nature of hazards and determining the level of risk.

**Safety Hazard** – Any hazard that could result in injury.

### Hazard Assessment and Control Frequency

Paragon Ventilation Ltd. will ensure that the Hazard Assessment and Control process is carried out:

- At reasonably practical intervals to prevent unsafe and unhealthy working conditions from developing.
- When a new work process or personnel are introduced.
- When a work process or operation changes.
- Before the construction of significant additions or alterations to a work site.
- Before work begins on a project. Existing hazards and potential hazards must be assessed, and a report must be prepared detailing the results of the hazard assessment and methods used to control or eliminate the hazards.

## **Roles and Responsibilities**

### ***Management***

Management's responsibilities within the Hazard Assessment and Control Process include, but are not limited to:

- Ensure a process is in place for the development of a critical task inventory.
- Ensure a process is in place for the development of a Job Hazard Assessment (JHA) for each critical task.
- Ensure a process is in place for assessing hazards at reasonably practical intervals.
- Evaluate tasks with high risk determined using the JHA process.
- Direct the completion and review of a JHA for each critical task through consultation with supervisors and employees.
- Sign off on all completed JHAs.
- Develop Codes of Practice, Safe Work Practices, and Safe Job Procedures for all required tasks, in conjunction with supervisors and employees.
- Ensure all employees are trained in hazard identification and risk assessment.

### ***Supervision***

Supervision's responsibilities within the Hazard Assessment and Control Process include, but are not limited to:

- Assist with the completion and review of a JHA for each critical task identified through consultation with management and employees, as required.
- Evaluate tasks with medium risk determined using the JHA process.
- Attend/Lead the Field Level Hazard Assessment (FLHA) process with affected workers.
- Sign off on completed FLHA's prior to the execution of the work or as soon as reasonably practical.
- When completing a FLHA, if the hazard cannot be controlled to an appropriate level of risk, notify management and do not proceed until the situation has been reassessed and an effective control can be put in place.
- Develop Codes of Practice, Safe Work Practices, and Safe Job Procedures for all required tasks, in conjunction with management and employees.

### ***Employee***

Employee's responsibilities within the Hazard Assessment and Control Process include, but are not limited to:

- Assist with the completion and review of a JHA for each critical task identified through consultation with management and supervisors, if necessary.



- Complete and sign off on a FLHAs to identify existing or potential hazards before any work begins.
- When completing a FLHA, if the hazard cannot be controlled to an appropriate level of risk, notify immediate supervisor and do not proceed until the situation has been reassessed and an effective control is put in place.
- Develop Codes of Practice, Safe Work Practices, and Safe Job Procedures for all required tasks, in conjunction with management and supervisors, as required.

### **Supplier**

Supplier's responsibilities within the Hazard Assessment and Control Process include, but are not limited to:

- Supply a copy of the Safety Data Sheet (SDS) prior to the product being introduced on the work site.

### **Risk Assessment Matrix**

The Risk Assessment Matrix is a tool used to rank hazards in the work site. It is a combination of the severity and probability of a given hazard and numerically defines the outcome.

**Severity** – How serious an injury or loss might be.

**Probability** – The likelihood that the identified hazard will result in an incident within a 3-year period.

**Consequence** - The result of an incident occurring, in relation to people, equipment and environment.

The table below categorizes the severity of different hazards in relation to people, property damage (loss), environmental impact, and public image and reputation:

Potential Consequences (For any incident or potential incident check all effects)				
Severity	People	Property Damage (Loss)	Environmental Impact	Public Image & Reputation
Catastrophic	Fatality	> 50,000	Reportable Occurrence	Government Intervention
Critical	Permanent Impairment or long-term injury or illness	10,000 - 50,000	Owner Standard not Met	Owner Intervention and Local Media Intervention
Moderate	Serious Injury (Restricted Work/ Medical Aid)	1,000 - 10,000	Housekeeping Not to Standard	Community or Local Attention
Minor	First Aid	< 1,000	No Impact	Individual or None
Marginal	Unsafe Act/Condition	0	No Impact	None

When considering the task/project, Risk Analysis typically addresses the following health and safety hazards.

PHYSICAL	CHEMICAL	BIOLOGICAL	PHYSIOLOGICAL
<ul style="list-style-type: none"> <li>▪ Ergonomic</li> <li>▪ Slipping and Tripping</li> <li>▪ Moving Machinery Parts</li> <li>▪ Fire</li> <li>▪ Excess Noise</li> <li>▪ Extreme Noise</li> <li>▪ Work site Violence</li> <li>▪ Stored Energy</li> </ul>	<ul style="list-style-type: none"> <li>▪ Gases</li> <li>▪ Vapors</li> <li>▪ Mists</li> <li>▪ Fumes</li> <li>▪ Dust</li> <li>▪ Radiation</li> </ul>	<ul style="list-style-type: none"> <li>▪ Viruses &amp; Bacteria</li> <li>▪ Mold &amp; Fungi</li> </ul>	<ul style="list-style-type: none"> <li>▪ Working Conditions</li> <li>▪ Stress</li> <li>▪ Fatigue</li> <li>▪ Threat of Work site Violence or Harassment</li> </ul>

## Job Task Inventory

A Job Task Inventory is a system developed to define all the tasks performed by each job (position) in the company. As there are a significant number of tasks for each job, this is best accomplished using the Job Task Inventory worksheet. This worksheet can be utilized as a tool to assess the training needed for each position within the company.

All the tasks identified must be risk ranked utilizing the Paragon Ventilation Ltd. Risk Assessment Matrix, to identify the critical (most hazardous) tasks.

## Critical Task Inventory

The Critical Task Inventory defines all the critical tasks conducted within an organization. As there are a significant number of tasks, this is best accomplished using a Critical Task Inventory Worksheet. The Critical Task Inventory Worksheet is a system which will include a list of the most critical tasks and will identify the potential risk of each task and prioritize them from highest to lowest. This regulates and prioritizes which hazardous tasks will be of immediate concern and will need to be controlled first.

Once a Critical Task Inventory has been developed by management, a Job Hazard Assessment (JHA) must be completed for each critical task.

## Formal Hazard Assessment

A Formal Hazard Assessment (FHA) is to be completed for each job. A coordinated effort from management, supervisors and employees will develop the FHAs so that expertise from all areas of the company provide their input. It is important the team selected to complete the FHA includes expertise from employees and supervisors who understand the hazards included with each task.

The team is to follow the Job Hazard Analysis and Control procedure and document the information on the Formal Hazard Assessment (FHA) form. This involves identifying both existing and potential hazards and then assessing the necessary controls that are required to be put in place to minimize the risk of injury or loss to a reasonably practicable level.

FHAs are to be communicated to employees as an administrative control method; so, employees are aware of the hazards of their Job and methods to control the risk of injury or loss. FHAs should be kept in a location where it is readily available to the workforce.

FHAs are to be reviewed/updated annually by management to ensure that they are up to standard and

### Section 3 – Hazard Assessment and Control Process

relevant with current processes. New FHAs are to be developed if there are high risk activities being performed by a job which has not been covered in existing FHAs or as changes in work scope/processes are made.

#### ***FHA Job List:***

- ***Office Worker***
- ***Project Manager***
- ***Field Supervisor***
- ***Shop Supervisor***
- ***Delivery Driver***
- ***Shop worker***
- ***Site Foreman***
- ***Field Worker***

### **Pre Job Hazard-Assessment**

Pre Job Hazard-Assessment is an essential process to ensure that all potential hazards and risks are recognized prior to the execution of a job or project. This is a process where all tasks and related hazards and appropriate controls of a job or project are identified and documented. Similarly, to the FHA process, all hazards identified must be prioritized using the risk matrix as a guide.

Information from the Pre-Job Hazard Assessment should be referenced in the development of a Safety Management Plan for the job or project.

Pre Job Hazard-Assessments are to be communicated to employees as an administrative control method; so, employees are aware of the hazards and methods to control the risk of injury or loss on the job or project. Copies of the assessments are to be kept at the work site for update and review.

### **Job Hazard Analysis (JHA)**

Job Hazard Analysis (JHA) is to be completed on each critical task through a coordinated effort from management, supervisors and employees so that expertise from all areas of the company provide their input. It is important the team selected to complete the JHA includes expertise from employees and supervisors who understand the hazards of the task.

The team is to follow the Job Hazard Analysis and Control procedure and document the information on the standardized Job Hazard Assessment (JHA) form. This involves identifying both existing and potential hazards and then assessing the necessary controls that are required to be put in place to minimize the risk of injury or loss to a reasonably practicable level.

All personnel involved in the development of JHA's are to sign on to the JHA form to illustrate their contribution to the process. Management will provide approval and sign off on the completed JHA.

JHAs are to be communicated to employees as an administrative control method; so, employees are aware of the hazards of the task and methods to control the risk of injury or loss. JHAs should be kept in a location central to the work being performed and readily available to the workforce.

JHAs are to be reviewed annually by management to ensure that they are up to standard and relevant with current processes. New JHAs are to be developed if there are high risk activities being performed which have not been covered in existing JHAs or as changes in work scope/processes are made.

## **Safe Work Practice (SWP)**

SWPs are written methods outlining how to perform a task with consideration to managing the risks of injury or damage to people, equipment, materials, environment and/or processes. SWPs should be developed using information from the Job Hazard Analysis to ensure the SWP includes the necessary controls. SWPs are generally written for all jobs which are classified as Medium or High Risk. Refer to Paragon Ventilation Ltd. Risk Assessment Matrix for more information on risk ranking.

All SWPs should be kept in a location central to the work being performed and readily available to the workforce.

## **Safe Job Procedure (SJP)**

SJPs are a series of specific steps that guide an employee through a task from start to finish in a chronological order. SJPs are designed to reduce the risk by minimizing potential exposure. SJPs are usually developed by management and employees because of completing a Hazard Assessment and Control, Incident. All SJPs should be kept in a location central to the work being performed and readily available to the workforce.

## **Safe Work Permit**

A safe work permit is a written record that authorizes specific work, at a specific work location, for a specific time period. Permits are used for controlling and coordinating work to establish and maintain safe working conditions. They ensure that all foreseeable hazards have been considered and that the appropriate precautions are defined and carried out in the correct sequence.

The permit is an agreement between the permit issuer and the permit applicant. That documents the conditions, preparations, precautions, and limitations that need to be clearly understood before work begins.

The permit records the steps to be taken to prepare the equipment, building, or area for the work, and the safety precautions, safety equipment, or specific procedures that must be followed to enable the employee(s) to safely complete the work.

## **Toolbox Meetings**

Toolbox Meetings are an opportunity to review the hazards and controls on the jobsite through a discussion of the following:

- Safe Work Practices (SWPs)
- Safe Job Procedures (SJPs)
- Codes of Practice
- Permits issued
- Emergency Response Procedure
- Known job hazards
- Upcoming changes to the workplace
- Unsafe conditions noticed

## **Field Level Hazard Assessment (FLHA)**

The FLHA is part of the Hazard Assessment and Control System which assists field employees in identifying and controlling task specific hazards. Prior to work commencing, all field employees must be involved in the FLHA process by doing a visual identification of hazards directly at the work site. The employees will then establish controls for all hazards referring to JHAs for the specific tasks, Safe Work  
Effective Date: October 4, 2016

### Section 3 – Hazard Assessment and Control Process

Practices, Safe Job Procedures, Codes of Practice, and other documents such as SDSs, manufacturer's specifications, etc. If the hazard cannot be controlled to a reasonable level of risk, management must be informed, and work must not proceed until the situation has been reassessed and an effective control can be put in place.

Each field employee present is expected to sign the FLHA form after the review has taken place. The FLHAs are used for all daily activities and should be revisited and updated if any of the following situations were to occur:

- A job scope changes or has additions to the originally assigned tasks
- Special/new equipment is being brought in during the course of work
- Entrance into a restricted/confined workspace is required
- New employees are introduced to the task
- Changes to weather conditions occur

Supervisors are to attend/lead the process with employees on the development of the FLHA and sign off on the completed FLHA form prior to the execution of the work or as soon as reasonably practical.

## Methods for Controlling Hazards

Paragon Ventilation Ltd. is committed and obligated to control or eliminate a hazard that poses a danger to the health and/or safety of employees. Only competent, trained personnel are allowed to correct a hazardous condition after completing a complete and accurate Hazard Assessment. Control of work site hazards follows the hierarchy of controls as defined in legislation as Engineering Controls, Administrative Control, and Personal Protective Equipment Controls.

### *Engineering Controls*

Engineering controls provide the highest degree of control because they eliminate or control the hazard at its source as close as possible to where the hazardous situation exists. Engineering controls are the preferred method of eliminating or controlling hazards. Engineering controls include the following:

**Elimination** – getting rid of a hazardous job, tool, process, machine or substance. Examples include:

- Providing hoisting or material handling equipment rather than having employees manually lift, lower, carry, materials, etc.
- Eliminating the need for employees to work above grade, by lowering equipment that must be accessed, such as valve controllers, gauges, sample points, etc.
- Providing proper working platforms instead of relying on personnel to access equipment or areas with ladders
- Providing a chemical injection system that eliminates the need for employees to handle a hazardous chemical

**Substitution** – if elimination is not practical, try substituting or replacing one substance or process with another. Examples include:

- Substituting a hazardous substance for a safer one
- Replacing hazardous operations with less hazardous operations
- Selecting tools, equipment, and machinery that require less maintenance
- Replacing heavy, awkwardly shaped loads with lighter loads that have handles and/or good gripping surfaces
- Storing hazardous materials in smaller quantities and containers

**Redesign** – hazards can sometimes be “engineered out” through redesign of the work site, workstations, work processes and jobs. Examples include:

- Providing fail-safe interlocks on equipment, doors, valves, etc.
- Installing guardrails on elevations
- Providing non-slip working surfaces
- Controlling traffic to avoid collisions
- Providing fixed detection systems
- Reducing the road grade
- Improving workplace lighting, ventilation, and temperature control
- Using regulators, governors, and limit controls

**Isolation** – hazards can sometimes be isolated through containment or enclosure. Examples include:

- Negative-pressure fume hoods in laboratory settings
- Sound reducing enclosures for noisy equipment

**Barriers** – some hazards can be blocked. The further a barrier keeps a hazard away from employees, the more effective the barrier. Examples include:

- Guards on machines
- Enclosures and covers
- Welding screens to prevent welding flash from reaching employees
- Debris and personnel safety nets
- Machinery lockout systems that protect maintenance employees from exposure to electricity, heat, pressure, radiation, etc.
- Separating vehicle and pedestrian traffic

**Absorption** – examples include:

- Baffles that block or absorb noise
- Local exhaust ventilation that removes toxic gases, dusts, or fumes where they are produced

**Dilution** – some hazards can be diluted or dissipated. Examples include:

- General ventilation that dilutes the concentration of a hazardous gas with clean air from the outside. While suitable for less toxic substances, it is not effective for substances that are harmful at low concentrations.

### ***Administrative Controls***

When engineering controls are not possible or practical, administrative controls are the next approach to controlling hazards. Administrative controls are less effective than engineering controls since they do not eliminate the hazard. Examples include:

- Safe Work Practices
- Safe Job Procedures
- Codes or Practice
- Hazard Assessment and Controls
- Work Permits
- Scheduling to reduce exposure to a hazard
- Transferring an operation to a contract service that has extensive experience in dealing with the hazard

- Inspections
- Additional Training

### ***Personal Protective Equipment (PPE) Controls***

PPE should only be used as a last line of defense to reduce the potentially harmful effects of exposure to a hazard. PPE is much less effective than engineering controls since it does not eliminate the hazard. PPE must be used properly and consistently to be effective. Awkward or bulky PPE may prevent an employee from working safely. In some cases, PPE can increase the likelihood of hazards such as heat stress and tripping and falling.

### **Emergency Control of Hazards**

On work sites where a Hazard Assessment and Control indicates that emergency action is required to control or eliminate a hazard, Paragon Ventilation Ltd. will allow only personnel who are competent and trained in correcting the condition to do so. Paragon Ventilation Ltd. will make every reasonable effort to control the hazard while the condition is being corrected.

### **Hazard Assessment and Control Procedure**

#### ***STEP 1 – Determine the Job to be assessed***

It is essential to ensure that the most hazardous jobs are examined first. The following factors should be considered when determining the most hazardous jobs:

- Incident frequency and severity history of the job (safety statistics)
- Potential for fatality or severe injuries (safety statistics)
- Newly developed jobs (manufacturing new products)
- Jobs that have been modified (new equipment)
- Jobs that are performed frequently (complacency)
- Jobs that are performed infrequently (lack of knowledge)

#### ***STEP 2 – Determine the Required Task(s)***

Once the job to be assessed is determined, the various job-specific tasks for that job are to be established and listed.

#### ***STEP 3 – Break the Task(s) Down into Basic Steps (This step is not required for FLHA)***

The next step required is to break each task into smaller, more manageable steps. Keep the steps in the correct, numerical order and number them sequentially (1,2,3, etc.). Any step that is out of sequence has the potential to cause a hazard to be missed or overlooked. Start each step with an action verb (i.e. watch, turn, switch, lift, change, alternate, place, etc.) followed by the action to be completed. Most tasks can be broken down and described in less than ten (10) steps.

Observing an experienced employee completing each step can provide an invaluable learning tool. Both supervisors and employees need to be involved in this process, guaranteeing that all the basic steps have been completed accurately and in the correct sequence. The observation should be completed under normal working conditions and the employee completing the job is to be assured that the job is the focus, not their competency. Employee input and comments can provide an insight into problems not easily detected. Suggestions and comments should be noted.



#### ***STEP 4 – Identify Potential Hazards***

When all steps have been recorded, potential hazards for each step must be identified. Using all of the assembled information, visualize and discuss each step and its possible consequences. Every potential hazard identified should be matched with each corresponding step. A preliminary method used to start hazard assessments is to identify all sources of energy the employee may come in contact with or be exposed to. Energy sources can include, but are not limited to, the following:

- Electrical
- Chemical
- Mechanical
- Biological
- Compressed gases or liquids
- Overhead work or work near water
- Working at elevated heights
- Powered equipment and tools
- Environmental factors
- Adverse weather or extreme conditions
- A variety of other energy sources applicable to the work site or task

#### ***Step 5 – Initial Risk Ranking of Each Hazard (This step is not required for FLHA)***

Once all of the potential hazards have been identified, they must be ranked using a standard ranking system from highest risk to lowest risk. *Utilize Paragon Ventilation Ltd.'s Risk Assessment Matrix to rank risks.*

#### ***Step 6 – Types of Hazards (This step is not required for FLHA)***

The type of hazard assessed shall be categorized as a Safety Hazard or a Health Hazard and recorded on the Job Hazard Assessment (JHA) form. Examples may include, but are not limited to:

- **Safety Hazard** – Exposure to rotating machines, working under a suspended load, icy conditions due to inclement weather.
- **Health Hazard** – Excessive noise levels, paint fume inhalation, asbestos inhalation, skin contact with solvents.

The following considerations should be reviewed and analyzed to evaluate potential risks associated with hazards discovered:

- Observation of the job
- Knowledge of potential risks, hazards and causes of work-related incidents
- Collective and personal experiences
- Brainstorming, discussions, possible solutions

#### ***STEP 7 – Evaluate Identified Hazards and Identify Control Measures Needed***

This step assesses the potential hazards of each step of the task, and any hazard controls that are required to eliminate, control, or minimize the hazards that have been identified to an acceptable level. The hazards identified should be controlled following the hierarchy of controls defined in legislation as Engineering



Controls, Administrative Controls, and Personal Protective Equipment (PPE) Controls.

***STEP 8 – Implement and Monitor the Hazard Control Measures***

After control measures have been implemented, review the initial risk ranking (step 5) of each hazard. Reassess and assign a final risk ranking for each step now that preventative measures have been put in place. If the risk is considered low and remains within an acceptable margin of minimal risk, continue with the task. If the level of risk remains in an elevated position, it is unacceptable. Additional risk assessment and analysis must be completed before further hazard control measures are attempted and implemented. This process of hazard assessment and control remains until the hazard is eliminated or reduced to an acceptable level.

**Record Retention**

Field Level Hazard Assessments are to be recorded and kept for two (2) years.

## Section 4 – Emergency Preparedness

### Purpose

The purpose of the Emergency Preparedness Program is to provide guidance to management, supervisors and workers for the development, implementation and review of an Emergency Response Plan (ERP) to follow in the event of an emergency that may occur at any work location.

### Definitions

**Competent** – Employee is adequately qualified, suitably trained, and either has sufficient experience to work safely without supervision or with only minimal supervision.

- **Adequately qualified** – The employee has qualifications, usually earned through a formal education program, training course, etc., or a combination of education and practical experience.
- **Suitably trained** – The employee has training that is appropriate to the tasks performed, equipment used, etc.
- **Sufficient experience** – The employee will safely perform work without supervision or with a minimal degree of supervision. Determining whether an employee has sufficient knowledge and experience to safely perform work is the employer's responsibility.

**Designated First Aider** – A person who has been formally trained and holds a valid First Aid certificate through a recognized agency (i.e., Red Cross, St. John's Ambulance, etc.).

**Emergency Response Plan (ERP)** – Comprehensive document to provide guidance on actions to be taken under various possible emergency conditions, including responsibilities of all employees, available organizational resources, sources of aid outside the organization, general methods or procedures to follow, authority to make decisions, requirements for implementing procedures within the company, training and practice of emergency procedures, communications and reports required.

**Emergency Planning** – Process to develop detailed procedures for responding to emergency situations such as fires, explosions, chemical spills or uncontrolled releases.

**Emergency Procedure** – Action to be taken in case of identified emergency.

**Emergency Rescue** – Procedure for moving a victim from a dangerous location to a safe place.

### Roles and Responsibilities

#### *Senior Management*

Senior Management's responsibilities within Emergency Preparedness include, but are not limited to:

- Provide resources for the development, implementation and review of the ERP.
- Ensure a documented plan is in place and communicated to all employees which identifies all potential emergencies. This will include the first aid requirements under the applicable Occupational Health and Safety (OH&S) legislation and regulatory compliance.
- Ensure an effective process is in place to communicate and test the ERP at least annually.
- Ensure all PPE and any other necessary equipment for emergency response both on and off site is provided.

### ***Management***

Management's responsibilities within Emergency Preparedness include, but are not limited to:

- Develop an ERP based on risk assessment prior to the execution of work at any work location which includes identifying all potential emergency situations that may arise.
- Coordinate emergency response drills at the required frequency.
- Revise the ERP as required based on recommended improvements identified through deficiencies found during emergency drills or through on-going reviews of the ERP.
- Assist supervisors in the implementation of the ERP as required.

### ***Supervision***

Supervision's responsibilities within Emergency Preparedness include, but are not limited to:

- Communicate and train all workers on their responsibilities within the ERP.
- Review the applicable ERP regularly to ensure the information is current and accurate.
- Assess first aid requirements to ensure the ERP meets the minimum requirement under the applicable OH&S legislation.
- Test the ERP through documented drills, table talks, etc. at the frequency identified during the Pre-Job Risk Assessment.
- Follow-up on corrective action(s) identified during emergency response drills and through on-going reviews of the ERP.
- Coordinate the execution of the emergency response plan in the event of an emergency.

### ***Employee***

Employee's responsibilities within Emergency Preparedness include, but are not limited to:

- Assist in the development of the ERP as required.
- Not starting work until familiar with their responsibilities in the event of an emergency.
- Adhere to all requirements of the ERP.
- Participate in emergency response drills as required and provide feedback for improvement.

### ***First Aider Responsibilities***

The designated First Aider will:

- Be able to promptly assess the condition of an injured employee and determine the appropriate level of care required, and administer first aid within the scope of their training.
  - Refer employees for medical treatment if injuries are considered to be serious or beyond the scope of the first aider's training.
- Be trained in the Global Harmonized System (GHS) and be familiar with the treatment required for employees exposed to harmful materials and substances on the work site.
- Record, or assist in recording, all observed or reported signs and symptoms of injuries and exposures to contaminants on the applicable safety forms as part of incident reporting.

### ***Drill Frequency***

A minimum of one drill must be completed annually. This drill must be documented and an assessment must be completed based on the findings of the drill.

## Training

The success of the ERP depends on the competency level of supervisors and workers to execute the plan. Supervisors will designate responsibilities to workers and will ensure prior training on worker's roles in case of an emergency is appropriate for the work site and any hazards likely to be encountered. As an example, workers may be designated responsibilities such as conducting a headcount.

Emergency response training will:

- Include simulated exercises appropriate to the types of emergencies likely to occur at the work site. Be repeated at regular intervals to maintain competency of the designated personnel in carrying out their duties in the event of an emergency.
- Capture results of training exercises which will be retained and made available.
- Training and competency assessment records on emergency response must be documented.

## Emergency Response Plan Assessment/Evaluation

While creating an ERP, it is important to assess the probability of an incident occurring and the consequence of the incident for which an emergency response may be necessary. Some of the different factors to consider in this assessment are the number of people likely to be exposed, the extent of losses arising out of potential emergencies, etc.

Each Emergency response plan must be reviewed annually and revisited whenever there are changes to operations, equipment, and/or personnel. Supervisors need to review the adjusted ERP with the workers. This assessment needs to determine whether additional training requirements are needed as a result of the adjustments to the ERP.

## Post Emergency Review

An emergency drill will be conducted annually. After each emergency response/drill, a formal meeting will be held as soon as possible to review the performance and quality of the response. As a means to improve emergency response, all actions must be developed with an assignment of responsibility to complete the action item and an assigned due date. The supervisor of the work site or management will lead this discussion. All post emergency reviews must be documented and action items will be monitored through to completion.

## Components of an ERP

A properly developed ERP will:

- Enable management to effectively prepare for potential emergency situations.
- Allow employees to respond to emergencies and maintain personal safety.
- Maintain continual improvement through emergency drills and tests.

The ERP will identify potential events that may require emergency response and the procedures to follow to mitigate the impact of the event.

The following items need to be considered when a plan is developed:

- Identify possible emergency situations and related emergency response procedures
- Communication of and training in the ERP
- Client procedures for emergency response, as required

- Site or facility diagrams
- Location and operational procedures of emergency equipment
  - Emergency equipment availability at off-site locations should be identified during the Pre-Job Safety Meeting or Advisors Meetings.
- Location and use of emergency facilities
- Fire protection requirements
- Rescue and evacuation procedures including:
  - Head count and verification procedures
  - Muster points
  - Primary and secondary escape routes
  - Access routes and doors for emergency access
- Shutdown procedures
- Alarm and emergency communication requirements
- Identification of First Aiders and First Aid requirements
- Designated employees to assist in rescue and evacuation
- Emergency contacts and phone numbers

## Emergency Evacuation

All work sites must have established safe meeting or muster points prior to the commencement of a workday. The chosen muster points are based on the assessment conducted as a requirement in the ERP. In the event of an evacuation, take the following actions:

- Safely cease job task in a quick and efficient manner.
- Shut down all sources of ignition (such as smoking, welding and vehicles) if safe to do so.
- If in a vehicle or mobile equipment, pull it over and park so access to hydrants or emergency equipment is not blocked (shut ignition off and leave keys).
- Keep phone and radio channels clear to facilitate emergency communications.
- Check for wind direction and any visible hazards (i.e., smoke, fire).
- Move in a crosswind direction out of the area and away from any visible hazard, proceed towards designated safe meeting or muster points to await further instructions.
- Head count to be conducted.
- If any individual is absent, the supervisor must note the following information and report to rescue and evacuation personnel to initiate search, if safe to do so:
  - Employee's name
  - Subcontractor's employer
  - Last known work location
  - If they were alone or with others
  - Last known job task they were performing
- If a search is required the supervisor will do the following:
  - Coordinate with the owner or prime contractor of the site and external response team (if applicable)
  - Confirm designation of trained personnel authorized to enter and search evacuated areas

- In the event that a rescue is required, the first responder will meet the following standards:
  - Wear proper personal protective clothing and equipment appropriate to the hazards likely to be encountered.
  - Maintain clear communications between all personnel engaged in rescue or evacuation activities.

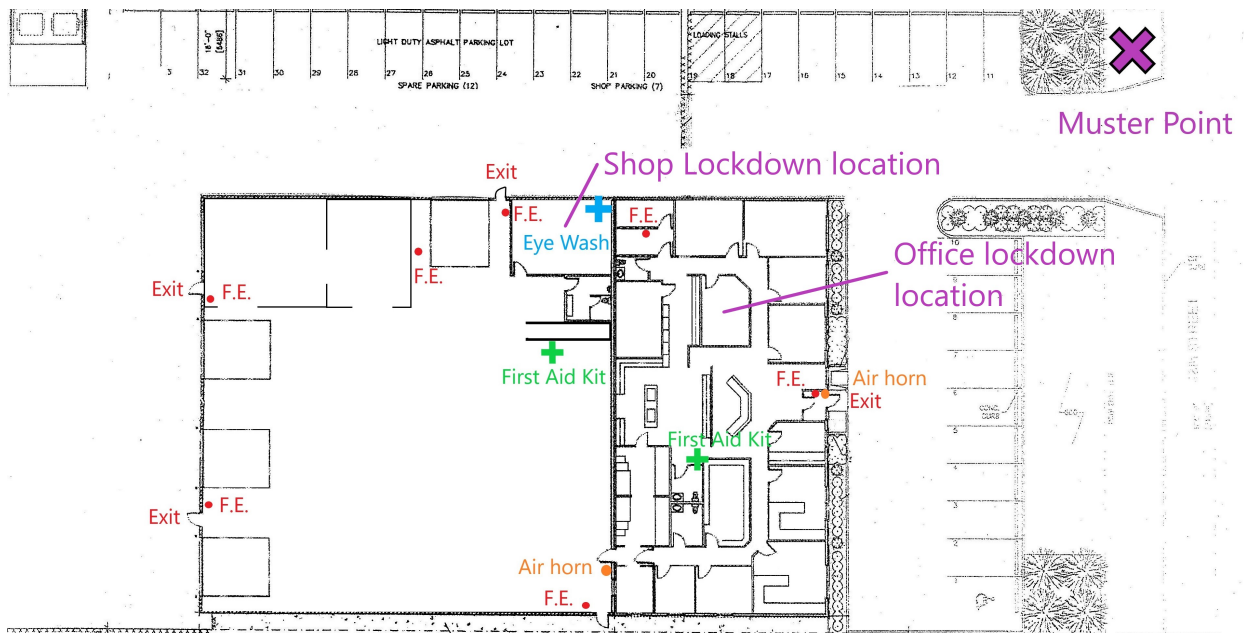
## Emergency Response Procedures Based on Type

Paragon Ventilation Ltd. main operating location will have an ERP in place based on an annual Hazard Assessment that addresses:

- |   |                              |
|---|------------------------------|
| • Injury/Illness                        | Last Reviewed- June 13, 2024 |
| • Fire                                  | Last Reviewed- June 13, 2024 |
| • Weather emergencies/natural disasters | Last Reviewed- June 13, 2024 |
| • Structure/equipment failure           | Last Reviewed- June 13, 2024 |
| • Hazardous substance release or spill  | Last Reviewed- June 13, 2024 |
| • Motor Vehicle Accident                | Last Reviewed- June 13, 2024 |
| • Lockdown                              | Last Reviewed- June 13, 2024 |

Supervisors responding to an emergency will assume control of the evacuation or response until police, fire department or emergency personnel arrive and take over that responsibility.

## Paragon Shop/Office ERP building plan:

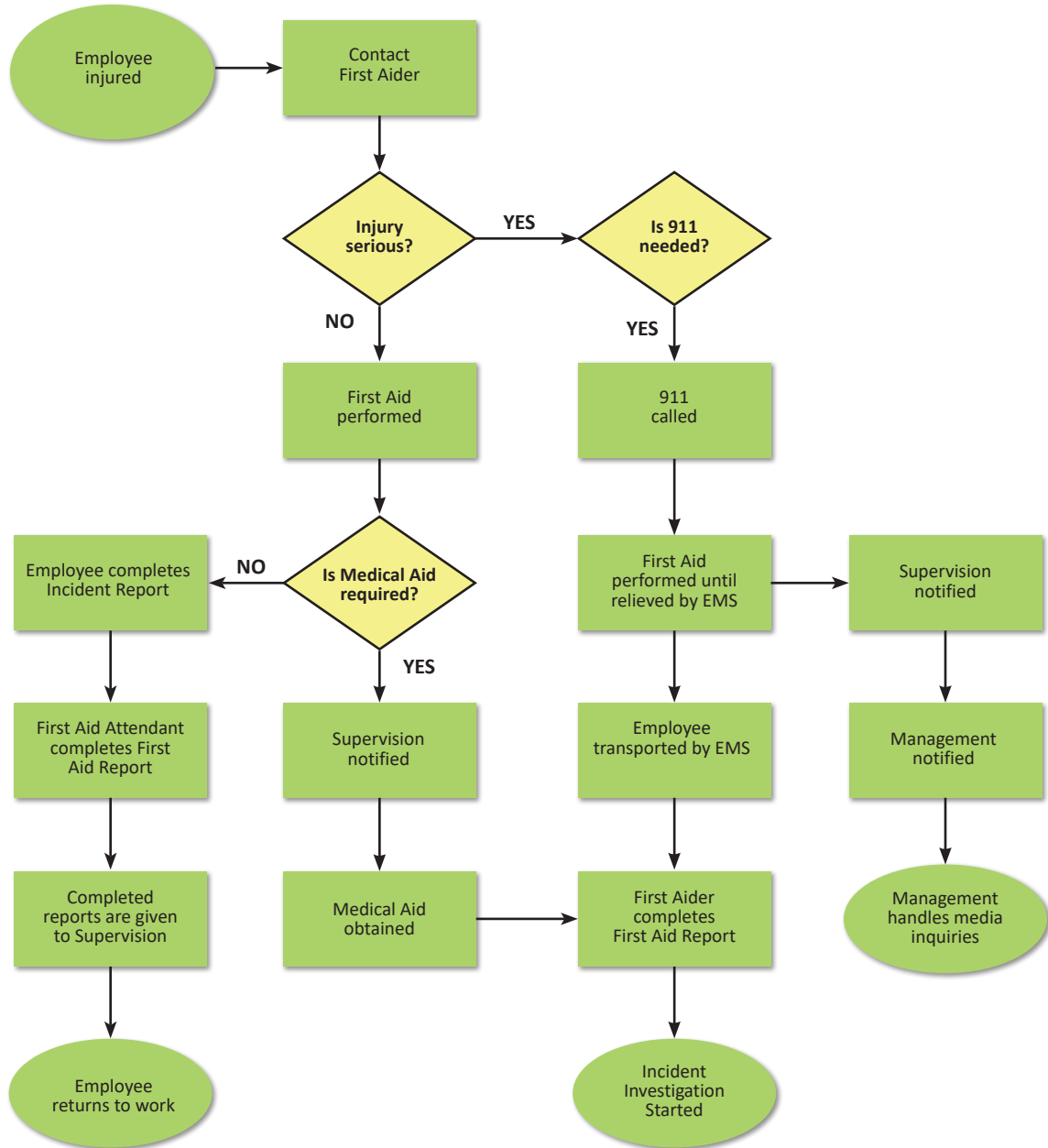


## **Injury/Illness**

All injuries will be reported immediately to supervision and necessary medical attention will be obtained quickly. First Aid can include treatment of minor scratches, cuts, burns and splinters, which are to be treated on the work site by a designated, competent First Aider. If the injury is severe and requires emergency medical assessment, the ERP is triggered. The process is as follows:

1. Contact First Aiders or medics on location.
2. Contact 911 (ambulance or other aids as required).
3. Reference Emergency Response Contact List.
4. The designated First Aider will secure the area, assessing the potential dangers (i.e., live, intact or downed power lines, chemicals, danger of falling objects, etc.).
5. If no external physical danger exists, the designated competent First Aider will administer First Aid with attention to the following:
  - Airway
  - Breathing
  - Circulation
6. Transportation is provided to nearest medical facility.
7. Alert client of situation and actions taken.
8. Obtain confirmation that medical assistance has been contacted.
9. If spinal injury is suspected, stabilize the injured person but do not move them unless in a life-threatening situation.
10. Keep injured person warm until medical assistance arrives.
11. When medical personnel arrive, brief them on the situation and possible medical history (if known).
12. If a fatality has occurred, secure the scene. Do not allow any evidence to be disturbed until authorities arrive.
13. Do not make any statement or express opinions to the media.
14. Write down the date, time, location and history of the incident including the First Aid administered.

## Injury/Illness Emergency Flowchart





***Transportation of Injured Employee***

Plans will be in place at all work sites for emergency transport of injured employees to a site where they will receive appropriate medical attention. Prior to arriving at the jobsite, Paragon Ventilation Ltd. will prepare for potential transportation of any injured employees from the work site to the nearest medical care facility. If transportation by ambulance is required but unavailable, or travel conditions become difficult, Paragon Ventilation Ltd. will arrange for alternate transportation for the injured employee.

- **Suitability** - Based on travel distances and the types of acute illnesses or injuries that are possible on the work site.
- **Weather** - Occupants will be protected from weather conditions.
- **Communication** - Occupants will have a source of communication to interact, if necessary, with the
- **Transportation** - Mode of transportation will be able to accommodate a stretcher as well as an accompanying attendant.

## Fire

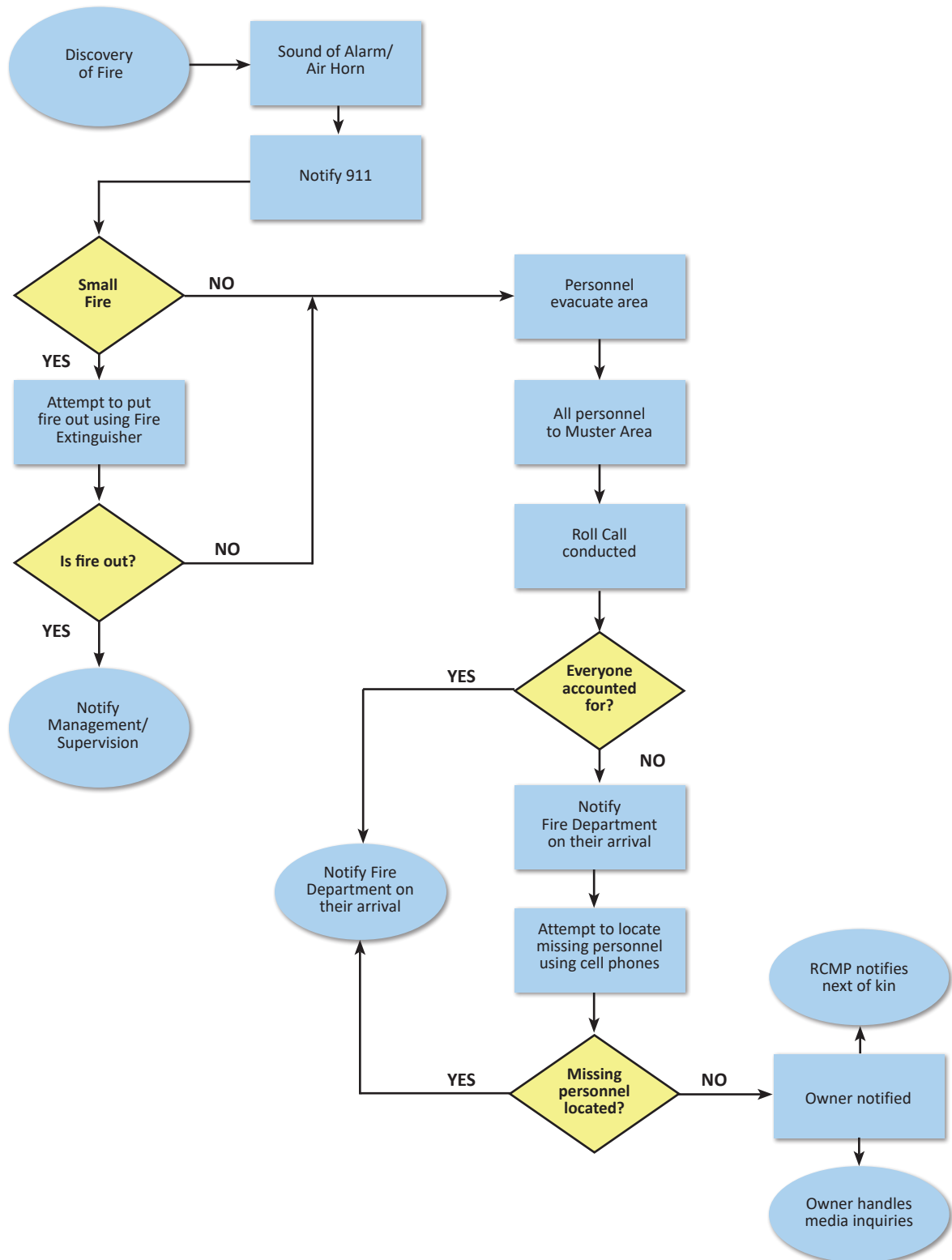
Depending on the volatility and intensity of the fire, it may be possible to extinguish the fire within the first 30 seconds of ignition or discovery. During the first 30 seconds, emergency response procedures should be followed by anyone discovering or involved in a fire.

1. Determine if the fire can be controlled using a fire extinguisher.
2. Call 911 immediately, if telephone service is available.
3. The evacuation procedure must be carried out, if required.
4. Secure the site to keep non-essential people out and safeguard records and equipment.

When directed to evacuate a building (warehouse, compressor building, etc.) under threat of fire, employees should adhere to the following:

- Leave lights on, doors closed and windows closed, but not locked.
- Stay as low as possible (crouch down) to stay under the smoke (may be toxic).
- If clothing catches fire, drop and roll to put out flames.

## Fire Emergency Flowchart



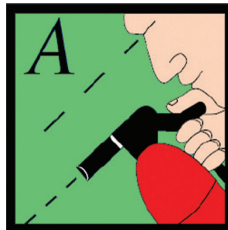
### *Use of Fire Extinguisher*

Remember the word **PASS**:

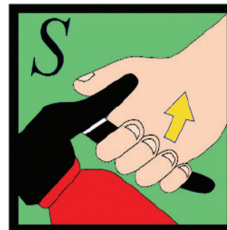
- Approach the fire from upwind if possible.
- Do not walk on an area that you have extinguished in case the fire reignites or the extinguisher runs out.
- The metal part of the CO<sub>2</sub> extinguishers tends to get dangerously cold – ensure you are holding the extinguisher properly.
- Hold the extinguisher in an upright position.
- Direct the extinguisher at the base of the flames until the fire is completely out.
- Replace the pin and return it to your compartment.
- Once the fire is out, do not walk away! Watch the area for a few minutes in case it reignites.
- Report the use of the fire extinguisher to your supervisor so that it may be recharged immediately.
- Check to ensure the extinguisher was recharged before it is returned to the workplace.



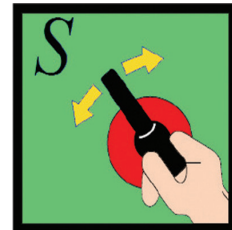
**P**ull the pin and point the nozzle away from you.



**A**im low and direct the extinguisher at the base of the fire.



**S**queeze the handle slowly and evenly. Continue to squeeze until the fire is out and/or the fire extinguisher is empty.



**S**weep the extinguisher from side-to-side. Start at one side of the fire and slowly work to the other side. Do not start in the middle of the fire.

## **Weather Emergencies and Natural Disasters**

In the event of a severe storm or tornado warning:

1. Supervisor will be informed.
2. Employees will be directed to take shelter as required.
3. A head count will be done to confirm that all personnel are accounted for.
4. In the event of pending blizzard conditions or extreme cold (making travel hazardous), the supervisor will determine if employees should be sent home early.
5. Employees are expected to use their discretion in driving to and from work in adverse conditions, and follow the “safe journey” management practices.
6. In the event of a power failure or disruption employees will assemble at designated muster points, and return to work only after power and lights are restored.
7. A head count will be done to confirm that all personnel are accounted for.
8. Employees trapped where emergency backup lights are not working are to remain where they are until personnel arrive with flashlights to guide them to safety.

### **Types of Storm Fronts**

When a severe storm front goes through the work site, the procedures detailed below will be followed to see that employees are sheltered. A head count will be conducted by supervisor to confirm that all personnel are accounted for.

#### ***Severe Lightning Storms***

- Avoid all lakes, sloughs and any other open body of water.
- Avoid tops of buildings, high lines, vessels or crane operation.
- Avoid construction equipment.
- If driving, park the vehicle off the road and activate the 4-way flashers until the storm has passed.

#### ***Tornado***

- Keep as low to the ground as possible. Stay inside a structure if possible, but stay away from all exterior doors and windows.
- Stop mobile crane operations. Lay the boom down if there is enough time or hook the load line to either the house or the structure at some low point. Move away from the equipment and take refuge in a shelter.
- If shelter is not available, find some low ground or a ditch and lie down with the head protected.

#### ***Blizzard***

When employees are working in remote areas where weather warnings are not always available, the following procedures will be adopted:

- Always be alert to prevailing weather conditions.
- Wear clothing to suit conditions (i.e., heavy-duty winter protection or survival equipment).
- Avoid sweating and exposure to cold. In cold weather, employees should work in pairs and conduct ongoing buddy checks for frostbite.
- Employees should not travel unnecessarily or alone.

### ***Flooding***

Employees working in areas where flooding could occur should be prepared to take appropriate action when a weather warning is issued:

- Post a flood watch with an appropriate warning device.
- Have procedures in place to leave on very short notice.
- Take only equipment or tools to do immediate tasks (i.e., only what can be mobilized in one trip).
- If evacuation occurs, shut down all equipment, gas valves, etc. Do not touch wet electrical equipment; only work with dry electrical equipment.
- Avoid travelling through flooded areas, especially at night when potential dangers cannot be seen.
- Know high ground safety areas, evacuation routes and location of emergency equipment.

### **Structure or Equipment Failure**

If a structure has collapsed or equipment has been involved in an incident, the general procedures below should be followed:

- Secure the area where the incident occurred, if safe to do so.
- Notify your supervisor.
- Only personnel who are giving medical aid can remain in the area; all other employees are to leave the area.
- Turn off area utilities (power, water, gas) as quickly as possible, if it is safe to do so.
- Make no attempt to clean up or make repairs until supervisor has given the “all clear.”

## **Hazardous Substance Release or Spill**

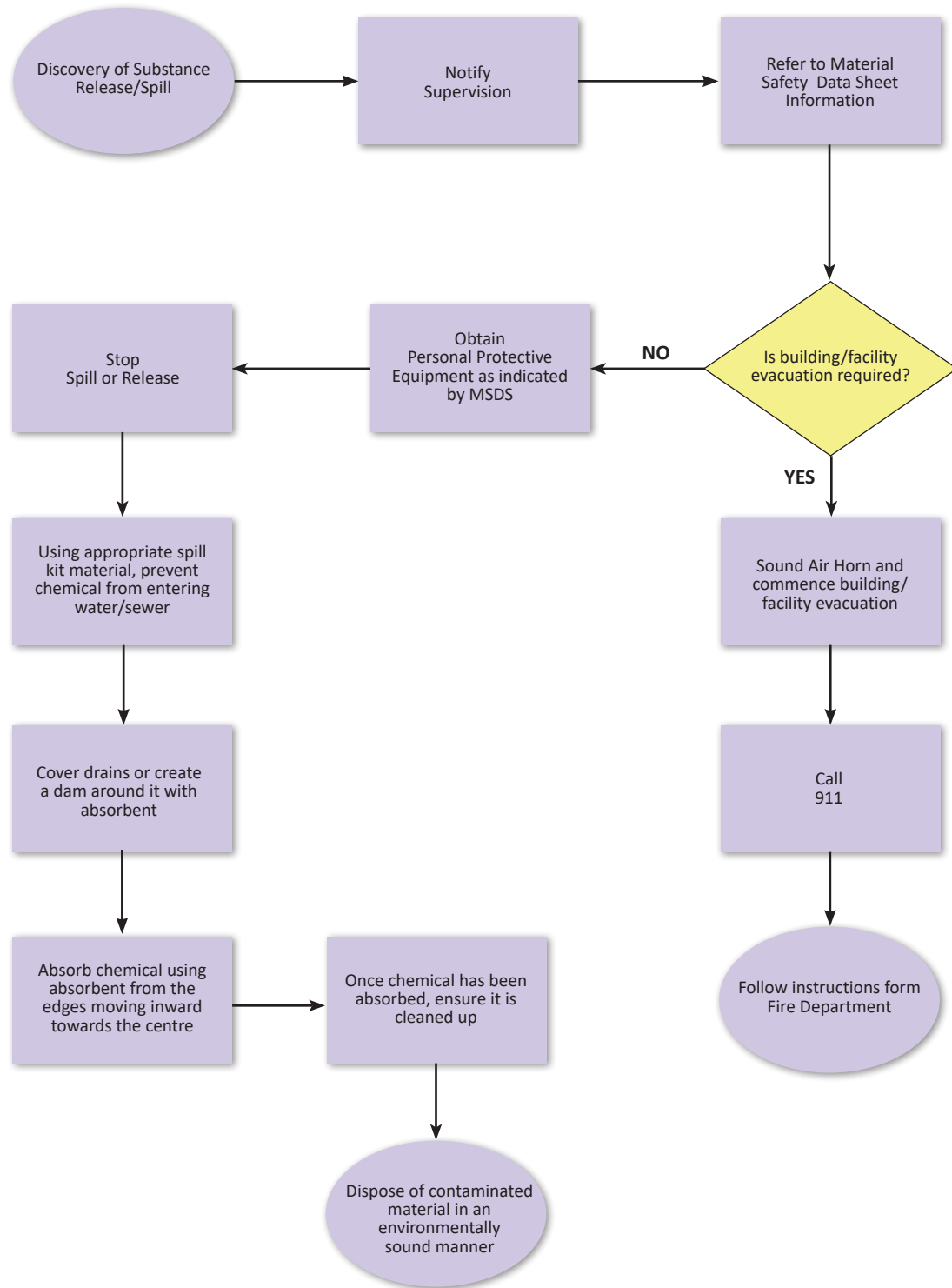
Chemical materials will be stored in appropriate areas and in proper containers to minimize the risk of a hazardous spill. If employees are required to control a release of a hazardous substance, clean up a spill, or carry out testing before re-entry, Paragon Ventilation Ltd. will provide:

- Appropriate PPE (based on risk assessment), which will be adequately maintained and readily available to employees.
- Material and equipment necessary for controlling and disposing of the hazardous substance. Spill kits will be easily accessible and contain the required supplies for the materials that may be spilled. (Assess amount and substance at the Advisors Meetings/Pre-Job Hazard Assessment).
- Spill kits will be part of the daily inspection items with adequate supply inventory available.

Immediately upon a release or spill occurring, steps should be undertaken to implement the spill plan, which consists of the basic steps given below. Refer to the Material Safety Data Sheets (MSDS) for more detailed information and procedures.

1. Stop the flow by:
  - Shutting off pumps, valves or nozzles, or activating the emergency shut-down switch.
  - Block ditch lines, culverts or drains.
  - Surround the spill with earth berms, spill booms, pads, etc.
2. Warn others in the immediate vicinity of the spill or release.
3. If there is a danger of fire or explosion:
  - No Smoking in the area.
  - Secure the area.
  - Contain the spill (use required personal protective equipment).
4. Extinguish any open flame.
5. Block ditch lines, culverts or drains.
6. Surround the spill with earth berms, spill booms, pads, etc.
7. Notify applicable personnel (supervisor, client).
8. If an airborne vapour is released or an uncontrolled liquid is spilled, notify local police or RCMP immediately (Reference Emergency Response Contact List). The risk of the airborne vapour may start public evacuation in the immediate vicinity.
9. For environmental spills contact the environmental authorities (Reference Emergency Response Contact List). They may start public evacuation in the immediate vicinity.
10. In most cases, start spill clean-up as soon as possible to prevent further spread of any liquid substance into storm drains, floor drains, flowing water or ground water. Soak up excess fluids using suitable absorbent materials.
11. Dig up affected material and put in proper environmental disposal containment bags, if required.
12. Use remediation agent (such as Oil Gator™) on the remaining area.

## Hazardous Substance Release or Spill Response





## Motor Vehicle Accident

All motor vehicle accidents must be to supervision as soon as practical. Depending on the severity and location of the accident steps may be skipped.

1. Move the Vehicle out of the path of any immediate dangers and stop (If possible/safe to do so).
2. If remaining in the vehicle poses risk to the occupants, they must observe the surroundings for other hazards such as fire, live electrical, traffic, etc. and determine the safest path to a clear location.
3. Once in a safe location, call emergency services as required.
4. Follow the ERP for Injuries/Fire when appropriate.
5. Check with the occupants of all vehicles involved in the accident to ensure that everyone is in a safe location and appropriate help has been requested.
6. Once all parties are safe and hazards have been controlled, all parties can exchange information for accident reporting.
7. Be courteous with others involved and do not assess fault.
8. Fill out the “Foster Park accident reporting card” located in the glove box of the company vehicles with the insurance documents. If the form is not available, be sure to collect:
  - The make, model and license plates of all vehicles involved.
  - Insurance documentation for all vehicles involved.
  - The names, phone numbers, and drivers’ licenses of all drivers involved.
  - The names of any passengers involved.
9. Take pictures of the scene.
10. Notify your supervisor of the accident.
11. Inspect vehicle to confirm if it is in drivable condition. remove any debris from the road when safe to do so.
12. Coordinate a tow truck to remove vehicle if it is not in driving condition.
13. Drive, or arrange transportation to a police station and fill out a police report.
14. Fill out a Paragon incident report.
15. Submit all documentation to your supervisor.
16. Assist in any investigations as required.

## Lockdown

A lockdown is a state of isolation or restricted access instituted as a security measure.

A lockdown can be initiated by any member of staff who becomes aware of a potential threat or condition which requires immediate response. A lockdown will be initiated by letting other workers in the area know of the potential threat. In the event of a lockdown the following steps are to be taken:

1. Notify all unaware workers of the lockdown.
2. The acting fire marshal is to call 911 and alert the authorities.
3.
  - a. **Office**, Workers are to gather in the boardroom, close the door and turn off the lights.
  - b. **Shop**, Workers are to gather in the shop lunchroom, close the door and turn off the lights.
4.
  - a. **Office**, the acting fire marshal is to lock the front door, close the shades on the windows, and turn off the lights.
  - b. **Shop**, The acting shop foreman is to close all the overhead doors, lock all the man doors, and turn off the lights.
5. The Fire marshal and shop foreman are to join their crews in the lockdown locations and keep everyone calm.
6. Once the authorities have cleared the threat, the Fire marshal will notify all workers in the office and shop that it is safe to resume regular duties.
7. Any Injuries/damage can be assessed and reported as required.

## **First Aid Requirements**

Paragon Ventilation Ltd. will promptly render first aid to employees if they suffer an injury at work and will transport or will provide transportation for medical treatment and will also provide equipment, services, supplies, attendants and facilities in accordance with applicable OH&S legislation.

All personnel at Paragon Ventilation Ltd. work locations will have access to first aid treatment during work hours. In some cases, a mobile treatment center will be available for use. First aid services, equipment and supplies will be located at or near the work location. Designated first aiders will be identified and communicated to all employees.

### ***First Aid Assessment***

Paragon Ventilation Ltd. will conduct regular assessments regarding the following information:

- The number of employees who may require First Aid at any time.
- The nature, extent and rating (low, moderate or high) of the risks and hazards in the workplace.
- Types of injuries likely to occur.
- Barriers preventing First Aid services.
- Transportation time of an injured employee to receive medical attention.

Paragon Ventilation Ltd. will review the assessment:

- Within 12 months after the previous assessment of review.
- When a significant change in operation occurs.

### ***Designated First Aiders***

Paragon Ventilation Ltd. will comply with applicable OH&S legislation with respect to the following:

- Required number of First Aiders at a work site, and
- Required qualifications and training.
- Designated First Aiders will provide documentation of training or certification received from an accredited training agency.

### ***First Aid Equipment***

First Aid equipment and supplies will be clearly identified, clean and dry, ready for use and protected from the elements (exposure to heat, cold, wind and moisture). First aid kits will be provided in company owned and operated vehicles.

First Aid equipment includes:

- First Aid kits
- Eye wash stations
- Emergency showers
- Stretchers
- Blankets
- Splints
- Additional first aid supplies (bandaging, antiseptics, etc.)

Location of first aid equipment will be communicated to all employees. Work sites will have signage posted in highly visible locations to indicate where first aid equipment can be found. If signage is not practical, information will be communicated to all employees by other means.

### **Record Retention**

Emergency Response Drills are to be recorded and kept on file for three (3) years.

## Section 5 – Incident Management

### Purpose

The purpose of the Incident Management Program is to effectively manage incidents of all types. Each incident will be investigated to determine causal factors and root cause in order to establish and implement control measures to reduce the possibility of reoccurrence. All incidents will be investigated regardless of severity, as the ultimate goal is prevention.

### Definitions

**Causal Factors** – A mistake or failure that if corrected, could have prevented the incident from occurring or would have significantly mitigated its consequences.

**Incident** – An unwanted or unplanned event that may result in damage, injury or illness.

**Root Cause** – A root cause is a cause that if identified and fixed will prevent the final undesirable event from reoccurring. Root cause of an incident generally relate to deficiencies or failures of management systems.

**Root Cause Analysis** – The search for the best practices and/or the missing knowledge that will keep a problem from reoccurring.

**First Aid** – A work related incident that typically does not require attention from a health care professional. First aid includes visit to health care professional solely for observation, non-prescription medication, wound covering, removal of foreign bodies from a wound (uncomplicated), removal of foreign bodies from an eye via irrigation or cotton swabs, treatment of 1st degree burn, hot or cold therapy, diagnostic test (e.g. - x-ray, blood test), issuance of a non-rigid means of support, use of temporary immobilization devices (e.g. sling), use of eye patches, use of finger guards, tetanus immunization, cleaning of a wound on skin surface, drilling a nail to relieve pressure, drinking of fluids to relieve heat stress, and massage (except when prescribed by a health care professional).

**Lost Time Incident (LTI)** – A lost time incident is a work-related injury that causes the injured person to miss work and is temporarily unable to perform any regular job or restricted work activity. A lost time incident does not include regular scheduled days off (i.e., normal days off, holidays) or the day on which the injury occurred. In cases where employment has been terminated, this would include any workdays lost that had been previously scheduled, or an estimate of workdays that would be lost after termination.

**Medical Treatment Incident** – A work related incident which involves medical treatment from a health care professional followed by immediate return to work without restrictions. Medical treatment includes issuance of prescription medication, wound closing/suturing, removal of foreign bodies from a wound (complicated), removal of foreign bodies from an eye (except irrigation and cotton swab), treatment of infection, treatment of a bruise via blood drainage, treatment of 2nd/3rd degree burn, issuance of a rigid means of support, amputation/permanent loss of usage, vaccine (except tetanus), and cutting away dead skin.

Medical treatment incidents do not include:

- Visits to a physician or other licensed health care professional solely for observation or counselling.
- “First Aid” as defined in this section.

**Near Miss**—A near miss occurs when an incident is narrowly avoided. It may have resulted in no consequences or only minor consequences, but the potential for more severe consequences was great.

**Potentially Serious Incidents (PSI's)**- any incident where a reasonable and informed person would determine that: The injury sustained requires medical attention beyond first aid or the incident could have caused serious injury:

- The incident could have caused serious injury and
  - the hazard was not identified in the hazard assessment or
  - the identified hazard had not been reasonably controlled

## **Roles and Responsibilities**

### ***Senior Management***

Senior Management's responsibilities within Incident Management include, but are not limited to:

- Ensure the prompt investigation of all incidents and near misses/PSI's.
- Review all incident investigation reports and provide feedback.
- Be Paragon Ventilation Ltd. spokesperson and communicate with the media, if required.
- Communicate with employee(s) family members in the event of a major injury or death.
- Retain the services of a third party investigator when required.

### ***Management***

Management's responsibilities within Incident Management include, but are not limited to:

- Report to government agencies as required under the Workers Compensation Board Act, applicable Occupational Health and Safety legislation as well as any other applicable legislation or regulatory requirements.
- Be involved in the investigation of recordable incidents involving injury, equipment damage, property damage and spills.
- Determine the investigation process required and have all incidents investigated.
- Coordinate the investigation of incidents and near misses/PSI's.
- Review investigation reports and determine what corrective actions are required and monitor whether the correction actions are completed on a timely basis.
- Review reports of unsafe work for completeness including a review for timely follow through on corrective actions.

### ***Supervision***

Supervision's responsibilities within Incident Management include, but are not limited to:

- Ensure first aid is provided to any injured employee.
- Secure the incident scene.
- Notify management of all incidents involving injury, equipment damage, property damage and spills.
- Notify the client based on contractual reporting requirements.
- Lead the investigation of incidents and near misses/PSI's.
- Collect all statements from witnesses.
- Collect required evidence and supporting documentation such as pictures and related safety documentation.
- Follow-up as soon as reasonably practicable on action items identified through the investigation.
- Follow-up as soon as is reasonably practicable on any unsafe or harmful condition or action.

### ***Employee***

Employee's responsibilities within Incident Management include, but are not limited to:

- Report all incidents as soon as reasonable practicable to their supervisor.
- Support the investigation process.
- Fill out a witness statement, if required.
- Report and document all near misses and hazards on the work site.

## **Legislative Reporting Requirements**

### ***Occupational Health and Safety (OH&S) Reporting Procedure***

The following types of incidents must be reported as per legislation:

- Serious injury or incident that results in death.
- An injury or incident that results in an employee's being admitted to a hospital.
- Unplanned or uncontrolled explosion, fire or flood that causes or has the potential to cause a serious injury.
- Collapse or upset of a crane, derrick or hoist.
- Failure or collapse of any component of a building or structure that was necessary for ensuring stability.
- Report PSI's "Potentially Serious Incidents" to Alberta OH&S. These are incidents that had potential to cause serious injury to a person, but did not.

### ***Workers' Compensation Board (WCB) Reporting Requirements***

Report to WCB if the incident results in, or is likely to result in:

- Lost time or the need to temporarily or permanently modify work beyond the date of the incident
- Death or permanent disability (amputation, hearing loss, etc.)
- A disabling or potentially disabling condition caused by occupational exposure or activity.
- The need for medical treatment beyond first aid (assessment by physician, physiotherapy, chiropractic, etc.)
- Incurring medical aid expenses (dental treatment, eyeglass repair or replacement, prescription medications, etc.)

The supervisor or manager will complete the "Employer Report of Injury" as soon as they are made aware of any work site injury. The completed report is to be submitted to the WCB within 72 hours of the injury.

The employee is required to complete "Worker Report of Injury or Occupational Disease" as soon as possible.

## **Reporting and Investigation**

Employees are required to report all incidents to their supervisor as soon as reasonably practicable so action can be taken to minimize their impact of injury or damage. The following are a list of reportable incidents and the information requirements for investigation:

***Workplace Injury***

Workplace injuries or discomfort in the body that may result in injury are to be reported to the supervisor as soon as is reasonably practicable. All workplace injuries are to be investigated.

***Equipment/Property Damage***

Any damage to vehicle, equipment or property is to be reported to the supervisor as soon as reasonably practicable. All equipment and property damage including motor vehicle incidents are to be investigated.

***Near Miss***

All near misses are to be reported to the supervisor as soon as reasonably practicable. All near misses will be reviewed and analyzed for corrective actions. Based on risk assessment, supervisor with consultation with management will determine if an investigation will be required.

***Environmental Spill***

Any spill on the work site is to be reported to the supervisor as soon as reasonably practicable. All spills are to be investigated.

***Occupational illnesses***

All Occupational illnesses are to be reported to the supervisor as soon as reasonably practicable. All occupational illnesses are to be investigated.

***Work Refusals***

All work refusals are to be reported to the supervisor as soon as reasonably practicable. All work refusals are to be investigated.

**Incident Investigations**

Management and supervisors with support from the employees will investigate reportable incidents near misses.



### Investigation Requirements

Management of Minor and Serious Reportable Incidents		
Incident	Rating	Investigator
Minor Near Misses	Low Risk Ranking using the Risk Matrix	Immediately mitigated by Worker
Major Near Misses	Medium to High Risk Ranking using the Risk Matrix	Supervisor/Third Party Investigator
Minor Injury	First Aid	Supervisor
Potential for Serious Incidents	Medical Treatment Case, Restricted Duty Case, Lost Time Case or Fatality including all injuries reportable to WCB	Supervisor/Third Party Investigator
Non Recordable Motor Vehicle Accident	Under \$2,000 in damage	Supervisor
Recordable Motor Vehicle Accident	Over \$2,000 in damage	Supervisor/Third Party Investigator
Non Recordable Equipment Damage	Under \$5,000 in damage	Supervisor
Recordable Equipment Damage	Over \$5,000 in damage	Supervisor/Third Party Investigator
Non Recordable Property Damage	Under \$10,000 in damage	Supervisor
Recordable Property Damage	Over \$10,000 in damage	Supervisor/Third Party Investigator
Non-Recordable Spills	Less than 200L	Supervisor
Recordable Spills	More than 200L and/or Reportable to applicable Environmental government agency	Supervisor/Third Party Investigator

### Training

Supervisors are to be properly trained on investigation techniques.

### Investigation Kit

Those persons conducting an investigation will have an investigation kit that includes:

- Incident Investigation Report
- Employee Incident Report
- Witness Statement
- Writing pad, pencil, pen and eraser
- Coloured ribbon to cordon off the scene
- Digital camera
- A fifty-foot (50ft.) measuring tape
- Sample containers for collecting evidence

## Documentation

A record of every acute illness or injury, as well as any other incident that occurs at the work site, is to be documented as soon as reasonably practicable after the incident is reported to Paragon Ventilation Ltd. Investigation reports will include:

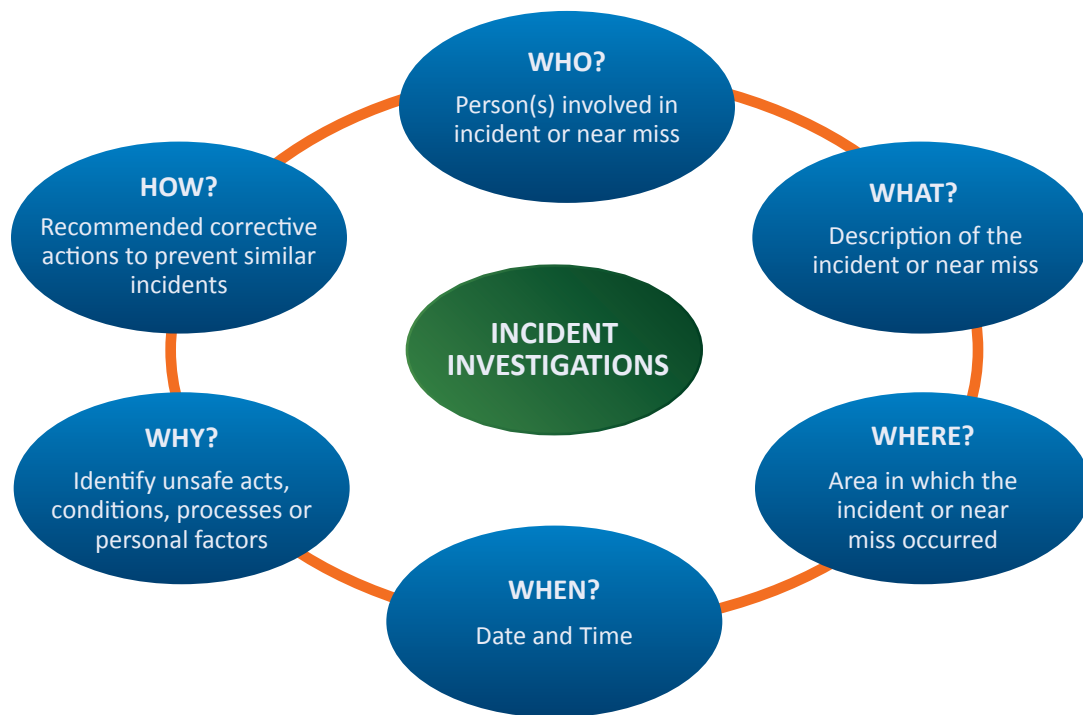
- Name of the employee
- Name and qualifications of the First Aider, as required
- Description of the incident
- Date and time the incident was reported
- Where the incident occurred on the work site
- Unsafe conditions or hazards
- Related procedures
- Related hazard assessments
- Related training
- Related competency assessment
- Related preventative maintenance documentation
- Work-related causes of the incident
- Corrective actions

Medical aid, first aid and lost time incidents will be classified and reported as per CAPP (Canadian Association of Petroleum Producers) Guide “Reporting of Occupational Injuries.”

## Investigation Procedure

Steps to conduct the investigation are as follows:

1. Take control of the scene. Employees are to not disturb the scene of an incident unless otherwise directed by the proper authorities or under the following circumstances:
  - To attend to persons injured or killed
  - To prevent further injuries or death
  - To protect property that is endangered as a result of the incident
2. Keep the scene untouched except for rescuing or providing aid to an injured person. Where possible and practical, collect and safeguard any physical evidence.
3. The supervisor is to notify police/RCMP and applicable governing bodies.
4. Begin the investigation.
5. Take photographs of the scene.
6. Interview people involved and obtain written statements where appropriate.
7. Analyze and gather related documentation to determine root cause. Look for where the management system failed.
8. Determine corrective actions in order to prevent re-occurrence.
9. Follow up to confirm corrective actions have been implemented.
10. Complete the investigation report.
11. Communicate the finding of the investigation/serious injury/potentially serious incident (i.e., Safety Alert/ Bulletin, stand-down or through Toolbox Meeting).



### **Notification of Family Members**

In the event of a minor incident, the injured employee will have an opportunity to telephone family members before being taken for medical treatment. If a major injury or death were to occur, the family will be informed in person by the owner.

### **Company and Government Notification**

The owner or designated management will notify occupational authorities and any governing agencies, as required by legislation. Delays in reporting may result in penalties against Paragon Ventilation Ltd.

### **Media Relations**

If an employee is approached by the media for information, the employee will be courteous and explain that information will be provided by the Owner or appointed spokesperson. The employee should not offer personal comments or opinions.

## Section 6 – Personal Protective Equipment (PPE)

### Purpose

The purpose of this program is to provide information to all employees of Paragon Ventilation Ltd. on the selection, use and care of Personal Protective Equipment (PPE) that will comply with requirements of the hazard assessment and control process and applicable legislation which are utilized to determine the necessary types of PPE to be worn.

### Definitions

**Personal Protective Equipment** – Protective clothing or equipment worn by employees to protect against health and safety hazards.

**Respiratory Protective Equipment** – Equipment whose function is to supply breathable air or to remove contaminants from the air.

**Flame Retardant Clothing** – Clothing that has been treated with chemicals that reduces flammability of fuels or delays their combustion.

**Dual Hearing Protection** – Simultaneous use of approved ear plugs and ear muffs when an individual is exposed to noise hazards equal to or over 105 dBA.

### Roles and Responsibilities

#### *Senior Management*

The owner's responsibilities within the PPE Program include, but are not limited to:

- Ensure an effective process is in place for the training of all employees on the selection, use and care of PPE.
- Ensure resources are available for the provision of specialized PPE as well as any PPE required for emergency response.
- Ensure any PPE provided by Paragon Ventilation Ltd. as per legislated employer responsibilities meets all legislative and regulatory requirements (i.e., hearing protection and respiratory protective equipment).

#### *Management*

Management's responsibilities within the PPE Program include, but are not limited to:

- Support the program by ensuring the required specialized PPE is available based on an assessment of the hazards.
- Inform employees of the necessity for PPE and clothing as well as their responsibility for its proper selection, use, care and handling.

### ***Supervision***

Supervision's responsibilities within the PPE Program include, but are not limited to:

- Verify through inspection that employees are performing a pre-use inspection of PPE.
- Verify through inspection that PPE is maintained and stored according to manufacturer specifications.
- Ensure workers utilize appropriate PPE for the task based on the hazard assessment and applicable legislative requirements.
- Only allow PPE on the job site that is compliant to applicable legislation and standards and is in a condition to perform the function for which it was designed.
- Only allow repair of PPE to be performed by an approved vendor or competent employee.

### ***Employee***

Employee's responsibilities within the PPE Program include, but are not limited to:

- Use PPE as per the hazard assessment and applicable legislation and standards.
- Maintain and store equipment according to manufacturer specifications.
- Inspect all equipment before use.
- Remove from service PPE determined through the inspection process to have defects.
- Report all defective specialized PPE to the supervisor.

## **General Personal Protective Equipment Guidelines**

Where possible, work site hazards will be substituted, eliminated or controlled through the use of engineering or administrative controls, such as job planning, proper selection of employees, to having workers follow safe work practices and procedures. Where hazards remain, the last line of defense will be the use of the specified PPE.

When the Hazard Assessment and Control process shows the task the employee is required to perform may expose them to potential harm, the supervisor will not allow the employee to begin the task until PPE is made available.

Employees are required to assess the hazards encountered when selecting the appropriate level of protection or combination thereof. When handling hazardous material, employees will reference the Material Safety Data Sheets (MSDS) to establish the required level of protection.

Employees will not use PPE that is not in a safe condition to perform the function for which it was designed. If the PPE selected causes additional hazards that could potentially endanger an employee, the employee will inform their supervisor who will reassess the situation via the hazard assessment process. The supervisor is then responsible to provide alternate controls to mitigate the hazards identified.

## **Personal Protective Equipment Training Requirements**

Supervision will provide instruction to employees on the selection, use and care of PPE that will be appropriate to the hazards on the work site and to follow the manufacturer's specifications.

Paragon Ventilation Ltd. will provide employees with the required Workplace Hazardous Materials Information System (WHMIS) training so that hazards and controls for various substances can be recognized. Paragon Ventilation Ltd. will inform

employees of harmful substances in their work areas that may injure the skin on contact or may affect the employee health if absorbed through the skin.

## General PPE Requirements

### ***Protective Headwear***

If required, personnel will wear protective headwear meeting CSA Standards. Protective hard hats are designed to protect the employee's heads from impact and penetration by falling or moving objects, flying particles or from high voltage electrical shock burns. Hard hats used by Paragon Ventilation Ltd. personnel on work sites will meet *CSA Standard Z94.1-05, Industrial Protective Headwear*.

The following requirements apply to the work site:

- Wear hard hat liners or other apparel suitable to protect the neck and head from cold temperatures when conditions warrant. Install winter liners and maintain them according to manufacturer's specifications.
- Maintain the hard hat in accordance with manufacturer's specifications, periodically check the hard hat shell and suspension for any signs of visible damage:
  - Replace the shell after five (5) years.
  - Replace the suspension assembly, as required.
  - Replace any defective parts before using the hard hat.
- Clean headwear using a mild detergent and rinse thoroughly in clean hot water.
- Do not store headwear in direct sunlight.
- Do not alter hard hats in any way such as drilling holes for air circulation or painting them for decorative purposes as this could affect their protective value.
- Never wear metal hard hats at any time; these are prohibited for safety reasons.
- Do not reverse the hard hat shell from the liner or wear backwards. Only wear as intended.



### ***Eye and Face Protection***

Paragon Ventilation Ltd. will provide specialized face and eye protection to employees. Eye protection is designed to protect personnel from hazards such as:

- Flying objects and particles (physical)
- Molten metals
- Splashing liquids (chemical)
- Ultraviolet, infrared and visible radiation (welding)



Exposure to potential eye and face injury can be reduced by wearing proper protective face and eyewear. Employees will use eye and face protective equipment when operating machines or carrying out other tasks that present potential eye or face injury from physical, chemical or radiation agents. Goggles, face shields and similar equipment will be of an approved design and construction in accordance with:

- Approved to *CSA Standard Z94.3-07 Eye and Face Protectors*,
- Approved to *CSA Standard Z94.3-99, Industrial Eye and Face Protectors*. and
- Appropriate for the work being done and hazards involved.

CSA-approved safety glasses with fixed side shields are required at all times on work sites except when in vehicles and offices. However, if there is a danger of injury or irritation to an employee's eyes or face when in vehicles or offices, Paragon Ventilation Ltd. will require that properly fitting suitable eye and face protection is worn based on the hazard assessment process.

Full face shields, goggles or other types of eye protection will be worn when safety glasses with side shields are inadequate to protect against hazards.

Prescription eyeglasses will be CSA-approved safety glasses with rigid side shields. Non CSA approved prescription eyeglasses can be worn under approved safety glasses or mono-goggles.

Employees are required to maintain and store face and non-prescription eyewear as per manufacturer's specifications.

### **Hearing Protection**

A noise management program is required at work sites where employees are exposed to excessive noise. The program will include policies and procedures that address noise exposure to personnel. The program should provide training on selection of noise or hearing protection, monitoring devices for the work site where excessive noise is present, warning signs, and audiometric hearing tests for personnel exposed to excessive noise in the workplace.

High noise work areas will have appropriate controls in place to reduce noise. In areas where Paragon Ventilation Ltd. does not have control over reducing noise levels, all personnel are to abide by the limits as set forth in the Occupational Exposure Limits for Noise Occupational Exposure Limits for Noise<sup>1</sup>, under *Schedule 3, Table 1* or 85 dBA in the Alberta Occupational Health and Safety legislation.

**Schedule 3; Table 1**  
**Occupational Exposure Limits for Noise**

Exposure Level (dBA)	Exposure Duration
82	16 hours
83	12 hours and 41 minutes
84	10 hours and 4 minutes
85	8 hours
88	4 hours
91	2 hours
94	1 hour
97	30 minutes
100	15 minutes
103	8 minutes
106	4 minutes
109	2 minutes
112	56 seconds
115 and greater	0

*Note: Exposure levels and exposure durations are to be pro-rated if not specified*

<sup>1</sup> Alberta Occupational Health and Safety Act, Regulation and Code effective July 1, 2009



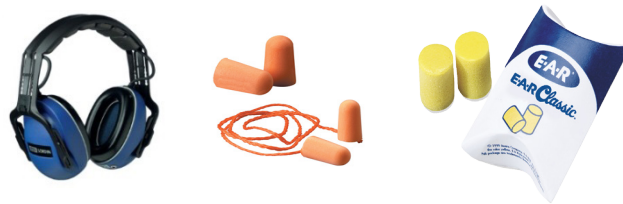
Noise level will be reduced as much as possible. Employees must not be exposed to noise levels which exceed 85 dBA, however, if it is not reasonably practicable to decrease the noise or isolate persons from the noise, personnel will wear approved hearing protection that meets *CSA Standard Z94.2-02 Hearing Protection Devices – Performance, Selection, Care and Use*. Adequate hearing protection will be of the appropriate class and grade as identified in the Selection of Hearing Protection Devices *Schedule 3, Table 2* in the Alberta Occupational Health and Safety legislation.

**Schedule 3; Table 2**  
**Selection of Hearing Protection Devices**

Maximum Equivalent Noise Level (dBA)	CSA Class of Hearing Protection	CSA Grade of Hearing Protection
≤90	C, B or A	1, 2, 3 or 4
≤95	B or A	2, 3, or 4
≤100	A	3 or 4
≤105	A	4
≤110	A earplug + A or B earmuff	3 or 4 earplug + 2, 3 or 4 earmuff
≥110	A earplug + A or B earmuff and limited exposure time to keep sound from reaching the worker's eardrum below 85 dBA	3 or 4 earplug + 2, 3 or 4 earmuff and limited exposure time to keep sound from reaching the worker's eardrum below 85 dBA

Dual hearing protection will be provided for continuous exposure to excessive noise levels, such as constant running machinery in an enclosed space. For extended exposure to noise that requires additional hearing protection, employees will be given ear muffs that can be attached to the hard hat.

Supervisors will confirm that employees “size” the earplugs or earmuffs for proper fit and protection. If there is uncertainty as to whether employees may be exposed to unacceptable levels of noise, the supervisor will contact management.



## Noise Management Assessment

Paragon Ventilation Ltd. will annually assess the effectiveness of the noise management program to determine:

- If the program adequately addresses education of personnel who are exposed to excessive noise in the workplace.
- The effectiveness of control measures in place to reduce personnel exposure to noise.

## Audiometric Testing

Management will arrange for the necessary instruments and personnel to complete noise level assessments, if employees are or may be exposed to noise in excess of 85 dBA. Audiometric testing and maintenance of test records will be done in accordance with applicable legislation. The person conducting the test(s) will further advise management on the options for noise suppression or protection if exposure exceeds acceptable levels.

Paragon Ventilation Ltd. will provide the following audiometric tests for employees exposed to excessive noise as per *Alberta Occupational Health and Safety Code Part 16 subsection 223(1)*:

- a. *An initial baseline test as soon as practicable, but no later than six months after the worker is employed, or within six months after work has been exposed to excessive noise because of a change in the workers duties or process conditions.*
- b. *Not more than 12 months after the initial baseline test, and*
- c. *At least every second year after the test.*

## Hearing Protection Training

Paragon Ventilation Ltd. will ensure supervision receives training on the following:

- Selection, use and maintenance of hearing protection devices to be worn in accordance with manufacturer's specifications.
- The risks of hearing loss with of exposure to excess noise.
- The correct use of control measures and hearing protection.
- Identification of suitable locations for posting temporary warning signs as required in work areas where the noise level exceeds 85 dBA.
- Methods of noise control to be used.

## Hand Protection

Employees will wear work gloves to protect against cuts, burns, chemicals and exposure to elements. This section will work in conjunction with the guidelines outlined in the Safe Work Practices.

The hand protection required will be dependent on the task and type of hazards the employees will be exposed to. This will be determined via the hazard assessment control process. The following are examples of work tasks and the corresponding recommended hand protection to be used:

- Light work or general duties – use cotton or canvas gloves.
- Handling abrasive material or sharp edged metal – use cut resistant gloves with a rating of at least **A3** as per **ANSI 105-2016 Cut Protection Classification**
- Handling chemicals or corrosive materials – use plastic or plastic coated gloves made from neoprene or nitrile.
- Exposure to elements – use insulated and weather resistant gloves.
- Electric work – use specifically made and approved rubber gloves which adhere to *Occupational Safety Health Administration (OSHA) standard 29 CFR1910.137*.



## Protective Footwear

Footwear must be appropriate for the tasks being completed. If the hazard assessment identifies the need, all employees at work sites will wear CSA Standard Z195-02 *Grade I Safety Footwear* to provide adequate foot protection and to comply with legislative requirements. Footwear meeting the CSA Grade I requirements is identified by a green triangle on the outer side of the boot or on the tongue of the right boot. Footwear will be high-cut (minimum 6 inch in height) to be effective in providing adequate ankle support and protection. This section will work in conjunction with the guidelines outlined in the Safe Work Practices. All safety footwear will:

- Be appropriate to the work condition, terrain and climatic conditions.
- Be in good condition.
- Have adequate tread.
- Be high-cut and worn with laces tied.



## Protective Clothing

Protective clothing will suit working conditions and provide protection from any hazards identified via the hazard assessment process. Paragon Ventilation Ltd. will require that employees follow the protective clothing requirements below:

- Protective clothing will cover arms and legs completely.
- Loose fitting clothing is prohibited near moving or rotating equipment.
- Protective clothing is to be kept clean and in good condition according to manufacturer specifications.

### ***Flame Resistant Clothing***

When working in areas where the risks of a fire, flash-fire, flash-over or explosion exists, employees will wear flame retardant clothing. The following information defines the hazard levels to which this program applies and the specific required flame retardant work wear:

## Respiratory Protection

All employees who will be involved in the selection, use and care of respiratory protective equipment are required to read and comply with the Respiratory Protective Equipment Code of Practice.

## Fall Protection Equipment

All employees who will be involved in the selection, use and care of fall protection equipment are required to read and comply with the Fall Protection Code of Practice.

## Section 7 – Safety Orientation, Training and Communication

### Purpose

The purpose of the Safety Orientation, Training and Communication Program is to ensure employees have received the necessary training and orientations to perform their jobs safely.

### Definition

**Competent** – Employee is adequately qualified, suitably trained, and either has sufficient experience to work safely without supervision or with only minimal supervision.

- **Adequately qualified** – The employee has qualifications, usually earned through a formal education program, training course, etc., or a combination of education and practical experience.
- **Suitably trained** – The employee has training that is appropriate to the tasks performed, equipment used, etc.
- **Sufficient experience** – The employee will safely perform work without supervision or with a minimal degree of supervision. Determining whether an employee has sufficient knowledge and experience to safely perform work is the employer's responsibility.

### Roles and Responsibilities

#### *Senior Management*

Senior Management's responsibilities within the Safety Orientation, Training and Communication Program include, but are not limited to:

- Ensure an effective process is in place so all employees are competent to perform their assigned jobs.
- Ensure an organizational chart is established to include the minimum qualifications of each role within the company.
- Attend an on-site safety meeting at least annually.
- Participate in safety meetings to encourage a healthy two way communication between employee levels

#### *Management*

Management's responsibilities within Safety Orientation, Training and Communication include, but are not limited to:

- Coordinate the safety meeting process to ensure the minimum frequency of meetings is being met.
- Coordinate company communication by ensuring newsletters and safety bulletins are effectively utilized to communicate safety information and concerns.
- Hold periodic supervisor meetings to review health and safety activities including incident trends and health and safety opportunities for improvement.
- Designate qualified and competent personnel to supervise tasks that could endanger employees.
- Determine the minimum training requirements by job title.
- Determine the minimum competency assessments required to operate different tools and equipment
- Participate in safety meetings to encourage a healthy two way communication between employee levels.

### ***Supervision***

Supervision's responsibilities within Safety Orientation, Training and Communication include, but are not limited to:

- Assign a competent assessor to complete the required competency assessments on employee's ability to operate tools or equipment
- Lead safety meeting agenda to ensure the communicate tool is utilized as an effective tool to lead, direct and instruct employees.
- Participate in safety meetings and maintain healthy two way communication between employee levels

### ***Employee***

Employee's responsibilities within Safety Orientation, Training and Communication include, but are not limited to:

- Participate in safety meetings to create a healthy two way communicate of safety related topics and concerns.
- Only operate tools and equipment that one is qualified to operate.

### ***Visitors***

Main office:

- Visitors are required to sign in/out.

Shop:

- Short duration visitors are required to sign in/out and must be escorted at all times.
- If a visitor cannot be escorted at all times, they must complete an orientation for the shop.

Field:

- Visitors must be escorted at all times and follow the sign in/out requirements of the worksite.

## **Management/Supervisor Orientation**

Persons hired for the role of Management or Supervisor will receive an orientation covering the following topics:

- Detailed review of Paragon Ventilation Ltd. HSE-MS.
- Review of Emergency Response Procedures.
- Detailed review of applicable Codes of Practice, Safety Work Practices and Safe Job Procedures.

## **General Safety Orientation**

The designated Paragon Ventilation Ltd. trainer will conduct the general safety orientation. The designated trainer will confirm that the new employees have the required qualifications (i.e., tickets, certification) prior to conducting the General Safety Orientation. A key component of the orientation includes notifying the employees with their right to "Refuse Unsafe Work". Additional area covered in the general safety orientation includes a review of Legislation, company rules, safe work practices and procedures that are applicable to the worked tasked to the employee. The orientation can be in the form of a verbal and/or media presentation or any combination of the two.

Upon completion of the General Safety Orientation, the employee will complete and sign the Safety Orientation Checklist and return it to the designated personnel.

New employees must supply copies of all required certificates to Paragon Ventilation Ltd. for their records.

The General Safety Orientation will address the following safety topics:

**Company Policies**

- Health and Safety Policy
- Workplace Violence and Harassment Policy
- Discipline Policy
- Anti-Bribery and Anti-Corruption Policy
- Incident Management Policy
- Communications and Training Policy
- Personal Protective Equipment Policy
- Preventative Maintenance Policy
- Inspection Policy

**Company Programs**

- Hazard Assessment and control
- Emergency Preparedness
- Incident Management
- Personal Protective Equipment Program
- Safety Orientation, Training and Communication
- Mentorship
- Inspection
- Fatigue Management
- Disability Management
- Workplace Violence and Harassment
- Transportation
- Working Alone
- Journey Management

**Site Specific Training**

- Site Specific Emergency Response Plan
- Location of First Aid Equipment
- Material Safety Data Sheets (MSDS)
- Location of reference material (i.e., OHS booklets, Safety Manual)

**Additional HSE-MS Topics**

- Company Safety Rules
- Employee Responsibilities
- Obligation to Refuse Unsafe Work
- Competency Assessment
- WHMIS Training
- Relevant Safe Work Practices
- Relevant Safe Job Procedures
- Relevant Codes of Practice
- Relevant Job Hazard Assessments

**Communication**

Meetings are utilized to communicate HSE hazards, goals and objectives at the prescribed frequencies below:

- Pre-Job Safety Meetings
- Toolbox Meetings
- Safety Meetings

**Pre-Job Safety Meeting**

A pre-job safety meeting is held to outline all the planned events and hazards of the job, prior to starting the job, and will require participation from all employees and subcontractors on site.

**Toolbox Meeting**

Toolbox Meetings are used to provide current information on safety issues related to on-site project/facility activities. General topics may include:

- Designated First Aiders to meet the requirements of Occupational Health and Safety legislation
- Review of Hazards on the job site including associated controls
- Review of Emergency Response Plan including
  - Transportation of injured worker
  - Muster points
  - Evacuation routes
  - Alarm system
- Company wide serious injuries communicated to all sites and employees
- Job scope and plan for the current day, including identifying potential hazards.
- Manpower, Equipment and tools required for the work plan
- Near misses/potential for serious incidents
- Behavioral Based Observations (BBOs)
- Personal Protective Equipment based on an assessment of the hazards
- Designated smoking areas
- Parking policy
- Permits (if applicable)

Toolbox Meetings are to be held weekly, and must include the signatures of all workers in attendance, and be reviewed by supervising worker.

## **Safety Meetings**

Safety meetings are a key part of Paragon Ventilation Ltd. HSE-MS program. Safety meetings are to be in a formal setting, conducted by the management at least quarterly. Meetings are to be planned and announced in advance in order to include all employees.

Topics discussed should include the following:

- Information about health and safety issues relevant to the workplace.
- Reports from workplace safety inspections and from investigations of any work-related, time-lost injuries, including suggested corrective measures
- Review of new laws or industry standards
- Review of new company policies and procedures
- Training issues identified
- Future events in the industry that may impact specific work procedures
- Issues employees would like discussed



## **Safety Training**

### ***Management***

Minimum required training for management includes, but is not limited to, the following:

- Investigation training (minimum requirement of 2 Management staff to have this training)

### ***Supervision***

Minimum required training for supervisors includes, but is not limited to, the following:

- Investigation training
- Inspection training
- Leadership training courses
- Workplace Hazardous Material Information System (WHMIS)

### ***Employee***

Minimum required training for workers includes, but is not limited to, the following:

- Workplace Hazardous Material Information System (WHMIS) (Shop Employees)
- Construction Safety Training System (CSTS 2020) (Field Employees)

### ***Joint Health and Safety Committee Members***

Minimum required training for JHSC members includes, but is not limited to, the following:

- Joint Health and Safety Committee training.

## **Job Specific Training**

Further safety training will be provided based on the scope of the work and hazards identified. Examples of additional training may include the following:

- |  |                                 |
|--|---------------------------------|
| • Aerial Work Platform                       | • Fire Extinguisher             |
| • All-Terrain Vehicle (ATV)                  | • Hours of Service              |
| • Asbestos Awareness                         | • Ground Disturbance Level II   |
| • Benzene Awareness                          | • Log Book Training             |
| • Confined Space Entry                       | • Overhead Power Line Awareness |
| • Construction Safety Training System (CSTS) | • Standard First Aid            |
| • Enform H <sub>2</sub> S Alive              | • Wildlife Awareness            |
| • Fall Protection                            |                                 |

## **Competency and On-the-Job Training**

An employee that is new to the job or a particular task will work under the supervision of an individual (competent trainer) who has been deemed competent in that job/task. Training is to be continued until the employee is deemed competent. (i.e., employees are not allowed to operate equipment unless they are competent in the operation of that equipment). On-the-job training will be documented and filed.



An established organizational chart will be provided listing all positions and each role. Minimum qualifications for each role will be made clear.

Work that may pose a danger to the employee is to be completed by another employee who are more competent in that particular task. Training is to be continued until the employee meets the above definition of “competent.” Employees are not allowed to operate equipment unless they have been identified as being competent.

To assist with introducing employees to new job tasks, employees will receive training through the mentorship program or on-the-job training to verify competency. If employees have any concerns with performing a task for which they are not confident to perform, they have a responsibility to contact their supervisor before starting the task. Competency will then be assessed annually by a competent trainer/mentor.

For the competent trainer providing on-the-job training, the following steps need to be addressed:

***Step 1 – Introduction***

Explain:

- What is to be learned
- How it will be instructed
- How the skill will be evaluated (tested)
- Why the employee needs this skill
- And where it fits into their job

***Step 2 – Perfect Demonstration***

Demonstrate the entire task, explaining each step as it is performed. Depending on the complexity of the task, it may be valuable to demonstrate the task more than once. For instance, replacing a toner cartridge on the average laser printer is probably a task that could be demonstrated and explained once. However, a task like teaching an employee how to lift a pallet using a lift truck may require several demonstrations.

***Step 3 – Practice with Close Supervision***

Guide the employee through each individual step in the task carefully explaining each step along with an explanation of why each step is important. Depending on the complexity of the task and the employee’s prior knowledge, this step may be repeated several times.

***Step 4 – Practice with Moderate Supervision***

The employee has been guided through the task to the point where they are able to attempt it without direct supervision. At this point, the employee should be asked to explain to the competent trainer what each step is and why it is important. It is critically important that there be no deviation from the ‘perfect’ demonstration skill level. The employee should continue with this level of supervision until the task can be done without error. At this point, the focus is on quality of performance, not speed.

***Step 5 – Practice with Minimum Supervision***

Once the competent trainer is comfortable that the employee knows HOW to do the task without error, the employee should be given the opportunity to practice the task to build up speed. At this point, there is an increasing focus on quantity of performance, but NEVER at the expense of quality or safety. This step should continue until the employee and the competent trainer is comfortable with moving to the final step.

***Step 6 – Evaluation***

The employee has now been guided by the competent trainer step by step through each part of the task, has been given opportunity to demonstrate basic mastery of the task by doing the task and explaining each step to the competent trainer, and has also had a period of practice building up speed while maintaining perfect performance. At this point, a final evaluation (test) is indicated. The test will have been explained in step 1 so there is no surprise about what is expected.

**Refresher Training**

Competency refresher training will be provided when operational changes require it or when the processes used change, training will be completed by a worker deemed competent in the new process.

**Record Retention**

Non expired Training Records including competency assessment and mentor-ship records are to be maintained and kept on file for the entire time the employee is employed with Paragon Ventilation Ltd. Information that is required on the training includes the following:

- Trainer(s)
- Training requirements
- Completed training to date
- Minutes of all Toolbox Meetings and Safety Meetings are to be recorded and kept on file for two (2) years.

## **Section 8 – New to the Workforce and Employee Mentoring Program**

### **Purpose**

This program helps to safely integrate and provide the required training to new employees before, and during, entry into the work site. This program applies to all Paragon Ventilation Ltd. new employees.

### **Definitions**

A New Employee is:

- New to the work site; on site less than 3 months.
- Returning to the work site after being absent for a period of time and where the hazards in that work site changed during that time.
- Affected by a change in the hazards of a work site.
- Relocated to a new work site where the hazards in the new work site are different from the hazards at the employee's previous work site.

**Supervisor** – An individual who directly supervises a person or an activity.

### **Roles and Responsibilities**

#### ***Supervision***

Supervision's responsibilities within the Employee Mentorship program include, but are not limited to:

- Assign a mentor to a new employee until mentor determines that the employee is sufficiently trained to work alone.
- Not assign a task to a new employee without supervision until a mentor determines that the employee is sufficiently trained to work alone.

#### ***Mentor***

Mentor's responsibilities within the Employee Mentorship program include, but are not limited to:

- Orientate all new employees and communicate the HSE-MS, Safe Work Practices, Safe Job Procedures and Codes of Practice.
- Document the training provided to the new employee.
- Document the competency level of the new employee.
- Identify additional/supplemental training required.

#### ***New Employee***

New employee's responsibilities within the Employee Mentorship program include, but are not limited to:

- Not start a task without supervision overseeing his/her work until deemed competent to work alone.

## **Supervision of New Employees**

For the duration of time that the new employee is on Paragon Ventilation Ltd. work site, the supervisor is required to maintain surveillance or supervision of the new employee until the Supervisor is satisfied that the new employee is competent in their tasks and is showing awareness of those hazards around them.

The supervisor/mentor will, as time permits, monitor the activities of the new employee so as to confirm they are performing the assigned tasks in a safe manner and in accordance with Paragon Ventilation Ltd. Safe Work Practices and Procedures for that site. A competent mentor may be assigned, in place of the Supervisor, to work with the new employee and monitor their progress. A competent mentor may be assigned, in place of the supervisor, to work with the new employee and monitor their progress.

The supervisor is responsible for completing the new worker documentation and signing off that the worker is competent to work alone. Once it has been completed and the employee has been deemed competent, the supervisor is responsible for the removal of the new employee identifier.

The supervisor will provide the new employee with additional orientation and training if:

- Work site observation reveals that the new employee is not able to perform work tasks or work processes safely.
- It is requested by the mentor.
- It is requested by the new employee.
- Supervisor will confirm that the owner or prime contractor of the work site is aware of the amount of new employees on-site, if requested by the owner or prime contractor.
- New employees will never work alone.
- New employees will never be more than 75% of the employees in a crew.

## **Mentor**

Where possible, a mentor will be assigned to work with, or close to, the new employee. The employee will be informed that the mentor their contact person if they have any safety questions or concerns about the work. The mentor should be competent with an in-depth experience of the tasks assigned to the new employee so as to be able to offer guidance and answer any questions. The mentor will see that the new worker follows the New Worker Program, provide the new worker with job skills, coaching and training. Training will be recorded and documented properly, and the mentor will provide feedback to the Supervisor on the new workers progress.

## **Employee Competency and Training**

Employee competency and training is an essential part of reducing work site injuries. Employees need to know how to do their jobs safely without risking their health and safety. New employees are at greater risk of injury due to their lack of familiarity with the hazards of the job task and the hazards of the worksite. The training of the employee and orientating the employee to the worksite is necessary to manage the risk of unfamiliarity. Training tests and competency assessments are an effective too to assess new employee's retention of information.

The new employee will continue to be supervised and monitored to confirm that they are performing the assigned tasks in a safe manner and in accordance with Paragon Ventilation Ltd. Safe Work Practices and Procedures.

New employees will receive training in the correct and safe way and be considered competent to complete their job duties before being allowed to work alone. Supervisor must be satisfied the employee is competent in their tasks and is aware of those hazards around them.

### **Record Retention**

Documentation of the training and orientation provided to the new worker is required. The training records will be retained by Paragon Ventilation Ltd. and shall be retained for the length of time the new employee is employed with Paragon Ventilation Ltd..

Records will be maintained with the following:

- Training, monitoring and corrective actions
- Work site observations that identify additional training requirements
- Training suggested by the mentor
- Training requested by the employee

## Section 9 – Company Safety Rules

### General

Safety rules and regulations are an integral component of Paragon Ventilation Ltd. When used effectively, these rules can contribute to the overall success of the program. Safety rules are developed internally and enable management to have a closer relationship with employees while providing valuable input.

### Definitions

**Rule** – An authoritative, prescribed direction that governs and controls actions and activities.

**Guideline** – A general rule, principle, or piece of advice.

**Regulation** – An ordinance, a law or a directive set by an outside organization or agency, such as the government, for control of people, environment, property and materials.

### Housekeeping Guidelines

Paragon Ventilation Ltd. has a high standard of housekeeping and expects employees to:

- Remove all sharp objects such as nails in wood, scrap welding rods, reinforcing rods, scrap metal, tin and broken glass.
- Verify through inspection that tools and/or materials on raised areas are stable.
- Secure all items that have the risk of being blown around by the wind.
- Keep all platforms, walkways and emergency exits clear so there is safe access and egress to and from all work areas.
- Immediately clean up spilled oil and slippery materials. Clean up and discard product once spill is fully absorbed.
- Maintain clear access to fire extinguishers, electrical panels, circuit breakers, exit doors, safety shower/eye wash stations and muster points at all times.
- Remove/clean up all tools and debris in work areas such as tools, ladders, material and garbage. Verify through inspection that the work areas at the end of each task and at the end of each day are safe from slip, trip, and falling hazards.
- Paragon Ventilation Ltd. will provide equipment or tools that have adequate capacity, strength, and the ability to safely perform the appropriate task.
- Cigarette butts must be disposed of in the appropriate receptacles.

## Paragon Ventilation Ltd. Rules

	NO SMOKING OUT OF DESIGNATED AREA		NO ALCOHOL/ DRUGS		SECURE HAIR FIRMLY WHILE WORKING AROUND EQUIPMENT
	NO HODDIES WHILE WORKING AROUND ROTATION EQUIPMENT		SECURE COMPRESSED GAS CYLINDERS IN AN UPRIGHT POSITION		USE THE TOOL AND EQUIPMENT FOR THEIR INTENDED PURPOSE
	WEAR SEAT BELTS WHILE OPERATING VEHICLES		WEAR PROPER PPE		NO THEFT/ VANDALISM
	NO FIGHTING, HORSEPLAY		NO WEAPONS AT WORK SITES		NO JEWELLRY WHILE WORKING AROUND EQUIPMENT
	DO NOT WALK UNDER SUSPENDED LOADS		REPORT ALL INCIDENTS OR EQUIPMENT/ PROPERTY DAMAGE		NO CELL PHONES USE WHILE DRIVING OR OPERATING EQUIPMENT

## General Rules

- Theft, vandalism or any other abuse or misuse of company property is prohibited and constitutes grounds for dismissal.
- All incidents that result in damage or injury are to be reported immediately.
- First aid treatment to be obtained promptly for any injury.
- Hardhats, safety boots and safety glasses are to be worn on all job sites as required by the general contractor.
- All work shall be carried out in accordance with appropriate safe work practices and your supervisor's direction.
- Only those tools that are in good repair, with all guards and safety devices in place shall be used.
- Every worker shall keep his/her work area neat, clean and orderly.
- Operate all vehicles and mobile equipment in accordance with site rules and highway regulations.
- Damaging, disabling or interfering with safety, firefighting or first aid equipment constitutes grounds for dismissal.

- Arriving for work or remaining at work when ability to perform job safely is impaired constitutes grounds for dismissal.
- Accidents, injuries or NEAR MISSES/POTENTIAL FOR SERIOUS INCIDENTS shall be reported promptly to the office.
- Clothing shall be appropriate to duties being performed. Long pants, a shirt and sturdy work shoes are the minimum requirements.
- Running is not permitted anywhere except in the case of extreme emergency.

## Material Rules

- All material and supplies required for a job must be requested on a production card.
- All production cards should be handed in at the end of the day in order to plan the next day's production order. Remember that you are not the only employee that requires material to be fabricated.
- If the supplies required are of a small nature it may be written on a notepad and placed on the shop foreman's desk.
- No one is to enter the storage rooms or storage areas without authorization.
- When removing supplier supplied goods all items not taken shall be neatly piled together and not scattered about with other jobs.
- When returning items and materials from jobsites they shall be placed in the designated areas, not left wherever you feel like setting them down. Everything has a place and if you do not know **ASK**.
- All materials that are returned from a job must be put on a production card as a credit or from that job.
- Place garbage in the proper place. Do not leave your cardboard and crates lying around where you took them apart. It is your mess you clean it up!
- All packing slips must be turned in daily.

## Tool Rules

- All tools that are in your possession must not be left lying around on the jobsite unattended.
- All tools that are not in use on the jobsite shall be locked up in the gang box.
- All tools in your possession that are not required in your day to day requirements shall be returned to the shop for the use of others if needed.
- Any tool that is in need of repair shall be returned to the shop so it can be repaired as required. A replacement will be forwarded to you if available.
- No power tools are to be left in the trucks overnight. They are to be brought into the shop nightly for safe keeping.
- Any loss or theft of tools must be reported immediately.
- Ladders are not to be left on jobsites unattended, they must be returned to the shop. If you do not have a truck to return them, then you must phone and request that they be picked up from the site.



### **Truck Rules**

- All trucks shall be kept clean inside and out at all times. Remember that it is the company's image that you are presenting and not your own!
- When refueling the oil shall be checked each time.
- All flat tires shall be repaired immediately.
- Any mechanical problems shall be reported immediately in order to arrange for any necessary repairs.
- All trucks shall be locked when in yard and when they are in precarious locations.

### **Time Card Rules**

- When working out of the shop on a daily basis time cards must be filled out daily. All time cards should be ready for the office by 7:30 A.M on Mondays.
- When you are working in the field you are to send a picture of the time card to the office on Monday A.M including all employees who are under your control. Failure to do so could result in non-payment of your hours on the upcoming payroll. Consequently, you would have to wait until next payroll period.

### **Cell Phone Usage/Electronic Devices**

Personnel will not use a hand-held cellular telephone for any reason including texting while driving a vehicle or operating equipment.

A wireless headset or hands-free device may be used while driving a vehicle, but not while operating equipment. Even when this requirement has been met, employees are strongly encouraged to keep calls as brief as possible, and to pull off the roadway in a safe location.

### **Non-Compliance**

Supervisors will immediately correct any violation of Paragon Ventilation Ltd. rules, safe work practices, safe job procedure and codes of practice before the violations become standard practice and disrupts the normal work environment. Any failure on the part of the Supervisor to immediately correct a violation or substandard practice is the equivalent of the Supervisor excusing the practice.

In most cases, violations result from a lack of training, ignorance of the rules, or an attempt to cut corners. Supervisor will be required to investigate the non-compliance and determine the root cause of the infraction. As an example, violations from lack of training will be corrected through improvements to the communication and training process; whereas, a violation due to a blatant disregard for company policies will be corrected through the disciplinary policy.

## Section 10 – Inspection

### Purpose

Inspections are a critical part of a comprehensive Health, Safety and Environment Management System. They assist in controlling losses to individuals, equipment, materials and the environment through early identifying and correcting of unsafe conditions, events, acts and behaviors.

All inspections will be conducted to verify compliance with applicable Legislation (i.e., Occupational Health and Safety Regulations, Commercial Transportation regulations).

It is the goal and duty of Paragon Ventilation Ltd. to maintain a comprehensive program of inspections at all facilities and jobsites. Inspections will address the following by:

- Ensuring risk control measures are in place and effectively protecting employees.
- Identifying other potential hazards that have not yet been assessed.

This program applies to the inspection of all operating locations, including head office, as well as all project work sites and will be implemented in conjunction with a comprehensive preventative maintenance program.

### Definitions

**Major Defect** – Commercial vehicles in a condition of an item specified as a major defect in *Schedule 1, 2, 3 or 4 of NSC Standard 13, Part 2* or tools assessed by an employee using the risk matrix to have a medium or high risk ranking for probability or severity of impact to Paragon Ventilation Ltd. or an employee, if not repaired.

### Roles and Responsibilities

#### **Senior Management**

Senior Management's responsibilities within the Inspection program include, but are not limited to:

- Ensure an effective process is in place for the inspection of premises, equipment and work practices/ methods at regular/appropriate intervals.
- Participate in one work site inspection every quarter. Document on the work site inspection checklist.

#### **Management**

Management's responsibilities within the inspection program include, but are not limited to:

- Monitor and update the the Inspection program for current work areas, equipment, methods, and intervals.
- Coordinate the inspection process to ensure the minimum frequency of inspections is being met.
- Support the supervisors in the implementation of corrective actions identified during the inspection processes.
- Participate in one work site inspection every quarter. Document on the worksite inspection checklist.

### ***Supervision***

Supervision's responsibilities within the Inspection program include, but are not limited to:

- Verify through inspection that all requirements under Paragon Ventilation Ltd. HSE are followed on work sites under his/her control.
- Conduct both informal and formal inspections within the designated work area at the frequencies prescribed in this section.
- Participate in one work site inspection every month. Document on the work site inspection checklist.
- Implement corrective actions on a timely manner to eliminate the condition or recurrence of any deficiencies identified.

### ***Employee***

Employee's responsibilities within the Inspection program include, but are not limited to:

- Participate in inspections as required.
- Perform pre-use inspections of tools and equipment.
- Remove from service and tag any tools, equipment, structures and Personal Protective Equipment (PPE) with major defects.
- Report all defective or unsafe tools or equipment to his/her supervisor immediately.
- Conduct information inspection regularly to identify at risk hazards and report them to his/her supervisor as soon as reasonable practicable.

## **Category of Inspections**

There are two classifications of inspections to be completed in the workplace:

- **Formal Inspections** – Planned inspections that use established procedures, checklists and are often on a set schedule, such as equipment inspections.
- **Informal Inspections** – Ongoing inspections not on a set schedule, procedure or definitive checklist, such as the visual inspection of Personal Protective Equipment (PPE).

## **Inspection Procedure**

The following outlines the inspection procedure to conduct an inspection from the initial review of the work site, tool or equipment to the follow-up requested on major defects. Specific information to be inspected is available on inspection checklists. Inspection checklists are created based on manufacturer specifications, and applicable Legislative requirements in conjunction with the opinions of experienced and qualified personnel.

1. Conduct inspection at the prescribed frequency.
2. Stop work when imminent danger exists.
3. Document deficiencies on the inspection checklist.

4. Supervisor to assign the corrective action to an employee and assign an attainable due date.
5. Sign and date the inspection form.
6. The inspection form is to be signed by the Supervisor (or designate) and forwarded to the respective Supervisor for corrective action.
7. All corrective actions taken will be noted and dated on the form.
8. A copy of the completed inspection report will be retained in the HSE files.
9. A record of outstanding inspections with deficiencies or outstanding corrective actions will be kept to account for the timely completion of corrective actions.

## **Types of Inspections**

Management, supervisors and employees are to work together to complete the following types of inspection as a necessary process to verify that Paragon Ventilation Ltd. is adhering to applicable legislation and manufacturer specifications:

1. Work Site/Office/Facility
2. Tools and Equipment Inspections
3. PPE Inspections
4. Trip Inspections

### ***Work Site/Office Inspections***

Work site inspections are conducted as a verification that employees and supervisors are following the practices in the HSE-MS

Supervisor is required to select a team of personnel to inspect the work site. The team should be comprised of one supervisor/management and one employee.

Management will coordinate the inspection so that the number of worksite inspections conducted meets the required frequency set out in this section.

### ***Tools and Equipment Inspections***

Tools and equipment inspections are conducted to verify the tool or equipment is safe to use. Inspections will be done by each employee prior to use.

Tool and equipment inspection checklists are developed to provide employees a check that the equipment is safe for use based on the manufacturer's instruction and specifications.

All deficiencies are to be noted on the inspection checklist provided for the tool or equipment. If possible, the deficiency should be corrected immediately. If the deficiency poses an unusual risk not normally associated with the proper functioning of that particular piece of tool or equipment, then the tool or equipment is not to be operated. Then, tag the tool or equipment "Out of Service". Employees are to report major defect to his/her supervisor immediately.

### ***Personal Protective Equipment (PPE) Inspections***

PPE inspections are conducted to verify the PPE is safe to use to effectively protect the employee as the last line of defense against hazards. Inspections will be done by each employee prior to use and documented on the field level hazard assessment.

### **Government Agency Inspections**

Government agency inspections are independent review from representatives of governing bodies such as environmental, health and safety, and building codes departments of local government. The agents of these departments attending any of Paragon Ventilation Ltd. projects, facilities, or offices will be given full cooperation and be treated in a professional and courteous manner by all personnel.

Government Agency inspectors have the right to:

- Enter and inspect any work site.
- Review and procure copies of any HSE documentation.
- Inspect, photograph, or seize any tool or piece of equipment, or take samples of any material at the work site.
- Interview any employee at the work site.
- Stop work.

Supervisors and management are to be immediately informed of a local government inspector who arrives on site to conduct an inspection of the project. Management (or designate) will accompany the inspector during the full course of the site inspection.

All orders or citations resulting from a government inspection will be addressed immediately in conjunction with the support from employees, supervisor, management and the owner.

## **Occupational Health and Safety (OH&S) Inspections and Penalties**

### ***Occupational Health and Safety (OH&S) Officers***

Occupational Health and Safety (OH&S) officers have the authority to request:

- Personnel to identify themselves on-site.
- Employers to identify employees

Anyone who interferes with the officers is liable for the offence under The Act.

### ***Administrative Penalties***

Occupational Health and Safety (OH&S) officers can levy administrative penalties against persons for violations of legislation (Act, Regulations and Code). Administrative penalties can be applied to:

- Employers
- Employees
- Subcontractors
- Prime Contractors
- Suppliers

## **Inspection Process and Imminent Danger**

Supervisors or employees may identify situation in the course of the inspection where employees are determined to be in imminent danger. Imminent danger refers to any danger that is not normally present in a job or to any dangerous conditions that an employee would not normally perform their work in.

Anytime imminent danger is observed during an inspection:

- The respective work being performed will be stopped immediately.
- The supervisor of the area will be notified and will respond immediately.
- The supervisor will ensure that all employees are safe.
- Potentially dangerous situations must be effectively mitigated before work resumes.
- An investigation may commence as deemed by management.

Employees must refuse to perform any job they believe would put them or their fellow employees in imminent danger.

### Summary of Inspection Frequencies

**Vehicles/Equipment:** All employee levels are to complete inspect any vehicles/equipment being used daily.

**Office:** Must be inspected by management a minimum of once per quarter.

**Shop:** Shop must be inspected by a supervisor and worker monthly (supervisor and worker may inspect the shop together).

**Field:**

- **Project managers-** Each project manager must inspect one worksite per quarter (this can be done in conjunction with foreman/supervisors inspections).
- **Supervisors-** Each Supervisor must inspect one worksite per quarter (this can be done in conjunction with foreman/project manager inspections).
- **Site Foreman-** Each site foreman must inspect one worksite per month this should be done with a worker when possible (this can be done in conjunction with foreman/project manager inspections).

### Record Retention

Work site inspections are to be recorded and kept on file for two (2) years.

Tools and equipment inspections with no major defects are to be recorded and kept on file for two (2) years. Inspections with major defect are to be kept on file for five (5) years.

## Section 11 – Preventative Maintenance

### Purpose

The purpose of this program is to pro-actively reduce risk to employees caused by the breakdown of equipment, tools, machinery, vehicles and Personal Protective Equipment (PPE). This will be achieved through strict adherence to this program's preventative maintenance schedules and follow-up on major defects identified through the inspection program.

Preventative maintenance is most effective when used in conjunction with regular formal and informal inspections whereby any worn parts or parts showing a potential for failure noted within those inspections are accurately documented and scheduled for repair.

The implementation of the Preventative Maintenance program will address routine checks and a schedule to follow. As well, non-routine maintenance requirements will be made possible through a system of scheduling and removing at-risk equipment, tools, machinery, vehicles or PPE from service.

Records of all maintenance include maintenance service performed, deficiencies identified and repairs performed.

All preventative maintenance shall be performed by a qualified person and documentation that the maintenance was performed.

Major defects found through the inspection process shall be reported to a supervisor and defective piece cannot be operated until one of the following option has been performed:

- Removed from service
- Repaired by a qualified person

### Definitions

**Major Defect** – Commercial vehicles in a condition of an item specified as a major defect in *Schedule 1, 2, 3 or 4 of NSC Standard 13, Part 2* or tools assessed by an employee using the risk matrix to have a medium or high risk ranking for probability or severity of impact to Paragon Ventilation Ltd. or an employee, if not repaired.

### Roles and Responsibilities

#### **Senior Management**

Senior Management's responsibilities within the Preventative Maintenance program include, but are not limited to:

- Ensure an effective process is in place to confirm that all equipment used by employees will adequately perform functions it is designed to perform and is free of major defects.
- Ensure an effective process is in place to confirm that the preventative maintenance program remains applicable, relevant and compliant with legislation, industrial standards and manufacturer specifications.
- Only purchase, rent, or lease equipment, machinery, tools, vehicles and PPE that is manufactured in accordance with all provincial and federal legislation, and all manufacturing standards set out by governing authorities (i.e., CSA, ANSI, etc.).



### ***Management***

Management's responsibilities within the Preventative Maintenance program include, but are not limited to:

- Confirm adequate training of supervisors in the implementation of the preventative maintenance program.
- Use only qualified personnel to conduct maintenance on equipment, machinery, tools, vehicles and PPE.

### ***Supervision***

Supervision's responsibilities within the Preventative Maintenance program include, but are not limited to:

- Follow the preventative maintenance schedules.
- Enforce compliance with this program in their respective work area.
- Not assign unsafe equipment, machinery, tools, vehicles and personal protective equipment to employees for use or operation.
- Monitor defective equipment, machinery, tools, vehicles and PPE and schedule for non-routine maintenance or replacement as needed.

### ***Employee***

Employee's responsibilities within the Preventative Maintenance program include, but are not limited to:

- Remove from service and tag any tools, equipment, structures and Personal Protective Equipment (PPE) with major defects.
- Report all damaged tool and equipment to their supervisor.

## **Category of Preventative Maintenance**

There are two classifications of preventative maintenance to be completed in the workplace:

- **Routine Maintenance** is planned comprehensive checks conducted by qualified personnel as per a specific preventative maintenance schedule which outlines the criteria and the frequency.
- **Non-Routine Maintenance** does not follow a pre-determined schedule and is scheduled as dictated by deficiencies noted in a formal or informal inspection. If major defects are noted then the defective item must be placed out of service.

## **Preventative Maintenance Requirements**

Standards exist on the required frequency of maintenance of equipment, tools, machinery, vehicles or PPE. These standard come from a variety mediums including:

- CSA Standards
- Alberta OH&S Code
- Owner's/Operator's Manuals
- Manufacturer's Recommendations

- Industry Recommended Practices
- Commercial Vehicle Safety Regulation

All equipment, machinery, tools, vehicles and PPE that are scheduled for routine maintenance will not be assigned or readily available for use or operation by employees.

Routine checks and maintenance shall be conducted in accordance with the applicable requirements set out in this section of the HSE-MS.

## **Type of Preventative Maintenance**

### ***Equipment, Vehicles, and Trailers***

Kilometers and hours of use are to be reported to the supervisor in order to maintain the schedule of maintenance. Pre and post use and trip inspections, daily time tickets, or mileage logs/reports are effective source of documenting kilometers and hours of use. The following items will be repaired and certified by the manufacturer or a designated representative thereof when needed:

- Rigging Equipment
- Personal Protective Equipment
- Compressors and Pneumatic Tools
- Cranes and Hydraulic Lifting Devices
- Emergency Service and Rescue Equipment
- Fire Extinguishers

## **Tools**

Powered/non-powered tools and ladders are to be tagged and removed from service and scheduled for repair or replacement at the sign of any form of wear that poses a risk to employees, property or the environment. This includes, but is not limited to:

- |                     |               |                         |
|---------------------|---------------|-------------------------|
| • Striking surfaces | • Blades      | • Electric power tools  |
| • Handles           | • Power cords | • Triggers and switches |
| • Safety devices    | • Safe guards | • Motor housings        |
| • Rungs             | • Risers      | • Uprights              |
| • Feet/pads         |               |                         |

## **Remove from Service**

Major defects found through the inspection process shall be reported to a supervisor and defective piece cannot be operated until one of the following option has been performed:

- Removed from service
- Repaired by a qualified person

As an example, fall protection rescue equipment that has sustained a shock load by either training or rescue operations shall be immediately taken out of service as per manufacturer specifications.

## Schedule of Preventative Maintenance

This schedule outlines the frequency at which comprehensive checks and maintenance will be completed as per manufacturer specifications, industry standards or a more stringent frequency established by Paragon Ventilation Ltd.

Preventative maintenance is a regularly scheduled maintenance activity to reduce maintenance and operating costs. If the majority of your vehicle repairs are made after the vehicle experiences a mechanical failure, you do not have a functioning preventive maintenance program.

As an example, fire extinguishers must be properly maintained to ensure that they will work when needed, and that they are safe to use. Adequate maintenance of extinguishers consists of regular inspections, recharging as needed, and a complete annual checkup and servicing. The following would make up the preventive maintenance program for fire extinguishers:

- Scheduled annual checkup and servicing (Routine Maintenance)
- Identified recharging as needed (Non-Routine Maintenance)

The following are the list of other tools and equipment preventative maintenance schedules:

### Summary of Inspections Requirements and Preventative Maintenance Schedule

	Inspection	Annually PM	Other PM Schedule
<b>Tools and Equipment</b>			
Vehicle	Pre-Use		5,000/10,000 kms
Trailers	Pre-Use	CVIP	
Scissor Lifts	Pre-Use	Structural	
<b>Personal Protective Equipment</b>			
Fall Protection Equipment	Pre-Use	Re-Certification	
Respiratory Equipment	Pre-Use	Re-Certification	
<b>Emergency Response Equipment</b>			
Fire Extinguisher	Monthly	Re-Certification	
Eye Wash Station	Monthly		

## Record Retention

Records must be kept of all maintenance work carried out, including inspections.

All repairs of tools and equipment including inspections with major defects are to be recorded and kept on file for five (5) years.

## Section 12 – Records and Statistics

### Purpose

Paragon Ventilation Ltd. will maintain records and statistics relating to health and safety as required by legislation and the Workers' Compensation Board (WCB) to enable management to identify, monitor and evaluate the effectiveness of safety performance. Records and statistics will be maintained for the following:

- **Incident investigation**
  - First Aids
  - Medical Treatment Cases
  - Lost Time Cases
  - Modified Work Cases
  - Non Compliance
  - Equipment Damage
  - Property Damage
  - Motor Vehicle Incidents
  - Potentially Serious Incidents (PSI's)
- **Safety Communications**
  - Inspections
  - Safety Meetings
- **WCB claim Information**
  - Medical records
  - Employer Reports
  - Employee Reports
- **WCB Trending**
  - Quarterly Claim Cost Summaries
- **Other Records and Statistics**
  - Near Misses
  - Potentially serious Incidents (PSI's)
- **HSE Trending**
  - Quarterly Trending (TRIF,LTIF)
  - Yearly Trending (TRIF, LTIF)

### Definitions

**Injury** – Any cut, fracture, sprain, amputation, loss of consciousness, etc. which results from an exposure involving a single event (or number of linked events close together in time) in the work environment. Injuries are caused by essentially INSTANTANEOUS events; “instantaneous” means “snap of the fingers”. Note that conditions resulting from animal or insect bite, or from one-time exposures to chemicals, are considered to be injuries. Work-related events, including overexertion that aggravates a pre-existing condition are deemed to be injuries.

**Illness** – An illness is any abnormal condition or disorder, other than one resulting from an injury, caused by exposure to environmental factors associated with employment.

**Lost Work Case (LWC)** – Lost workday case is a work-related injury that causes the injured person to miss work and is temporarily unable to perform any regular job or restricted work activity. Lost workday does not include regular scheduled days off (i.e., normal days off, holidays) or the day on which the injury occurred. In cases where employment has been terminated, this would include any workdays lost that had been previously scheduled, or any estimate of workdays that would be lost after termination. A single incident can result in several lost workday cases, depending on how many people were injured in the incident.

**Lost Workdays** – The number of lost workdays is the total number of scheduled workdays on which the injured person missed work and is temporarily unable to perform any regular job or restricted work activity. Lost workday workdays will continue until the employee return to work. If the incident reoccurs **and the** contract has been terminated, the number of days to be counted as lost work days will be estimated based on the medical condition of the injured worker at the time of termination.

**Lost Time Injuries** – Total recordable injuries are the sum of fatalities, lost workday cases, restricted work cases and medical treatment cases.

**Lost Time Injuries Frequency (LTIF)** – The lost time injury frequency measures the number of lost time injuries in the exposure period as a percentage of the workforce. It is calculated by multiplying the number of lost time injuries (LTI) by 200,000 and dividing by the exposure hours (total number of hours) worked during the period. One hundred (100) employees work approximately 200,000 hours in one year.

$$LTIF = \frac{\text{Number of Lost Time Injuries} \times 200,000}{\text{Exposure Hours}}$$

**Near Miss** – An event or action that could have resulted in personal injury, illness, equipment, property or environmental damage.

**Medical Treatment Cases (MTC)** – Medical treatment is the management and care of a patient for the purpose of managing an injury. Medical treatment does not include:

- Visits to a physician or other licensed health care professional solely for observation or counselling.
- Diagnostic procedures such as x-rays and blood tests, including the administration of prescription medications used solely for diagnostic purposes (i.e., eye drops to dilate pupils).
- “First Aid” as defined in this section.
- Restricted (Modified) Work Case (RWC)– Restricted (modified) work occurs when, as the result of a work-related injury:
  - The supervisor restricts the employee from performing one or more of the routine functions of their job, or from working the full workday that they would otherwise have been scheduled to work (*Non Recordable*).
  - A physician or other licensed health care professional recommends that the employee not perform one or more of the routine functions of their job, or not work the full workday that they would otherwise have been scheduled to work (*Recordable*).

**Restricted Workdays** – The number of restricted workdays is the total number of scheduled workdays on which the injured person was temporarily unable to perform all normally assigned work functions. Restricted workdays will continue until the employee is declared fit to return to normal work. If the incident reoccurs and the contract has been terminated, the number of days to be counted as restricted work will be estimated based on the medical condition of the injured worker at the time of termination.

**Total Recordable Injuries** – Total recordable injuries are the sum of fatalities, lost workday cases, restricted work cases and medical treatment cases.

**Total Recordable Injury Frequency (TRIF)** – Similar to LTIF, TRIF measures the number of total recordable injuries in the exposure period as a percentage of the workforce. It is calculated as follows:

$$TRIF = \frac{\text{Total Recordable Injuries} \times 200,000}{\text{Exposure Hours}}$$

## Roles and Responsibilities

### **Senior Management**

Senior Management's responsibilities to meet records and statistics requirements include, but are not limited to:

- Ensure a process is in place for the confidentiality of medical and other personal information.

### **Management**

Management's responsibilities to meet records and statistics requirements include, but are not limited to:

- Manage confidential medical and other personal information as required under privacy laws.
- Review health, safety and environment statistical trending to determine opportunities for improvement in the HSE-MS.

## Trending of Safety Statistics

Data collected relating to safety provides management with an overview of our program's activities and results. Examining summaries provides information to determine trends and setting priorities for future safety program measures. These summaries will be circulated to all management levels within Paragon Ventilation Ltd. and are to be reviewed with employees at regular safety meetings.

The quarterly Paragon Ventilation Ltd. statistical report will consist of a breakdown of:

- |   |                           |
|---|---------------------------|
| • Lost Work Cases and Lost Work Days            | • Near Miss               |
| • Lost Time Injury Frequency Rate               | • Motor Vehicle Incidents |
| • Restricted Work and Restricted Work Days      | • Equipment Damage        |
| • Medical Aid                                   | • Property Damage         |
| • Total Recordable Injury Frequency Rate (TRIF) | • Environmental Spills    |
| • First Aid                                     |                           |

## Annual Safety Report

On an annual basis, management will prepare a Safety Report summarizing the safety successes and opportunities from the previous year. This report will include statistical summaries, incident summaries, training information, ongoing safety projects, successes and project plans for the following year.

## **Permanent Facility Safety Files**

A Safety filing system will be maintained that includes:

- Emergency Response Plans
- Pre-Job Hazard Assessments
- Job Hazard Assessments
- Safe Work Practices Review
- Employee Orientations and Mentorship
- Training Records
- Competency Assessments
- Approved Driver Records and Driver's Abstracts
- Safety Alerts
- Subcontractor Management Documentation
- Subcontractor Inspections
- Daily Toolbox Meetings
- Safety Meetings
- Work Site Inspections
- Incident Reports and supporting Documents
- COR Audit

## **Medical Information**

Medical information is to be considered confidential and access is restricted to authorized personnel.

A Safety filing system will be maintained for confidential human resource information that includes:

- Drug Test Results
- Medical Information including First Aid Records
- Restricted Work Offers
- Restricted Work and Lost Time Reports
- WCB Documentation

Access to the information will comply with the Alberta Personal Information Protection Act.

As an example, medical and First Aid records are considered confidential and access to these records is restricted to the following personnel unless written permission is provided by affected employee:

- Person providing medical or First Aid
- Persons conducting incident investigation
- Persons authorized under legislative authority

An employee can allow their First Aid record to be made available to other persons but permission must be in writing indicating the information that can be released, the name of the person to whom the information is to be released, the date and the employee's signature. The employee does not have to provide this permission.

## Recordability of Occupational Injuries and Illnesses

### ***Guide to Determination of Record-ability of Incident***

Only work-related injuries classified as being more severe than first aid are considered recordable for benchmarking purposes. The decision making process (Figure 1) for determining recordability consists of four steps:

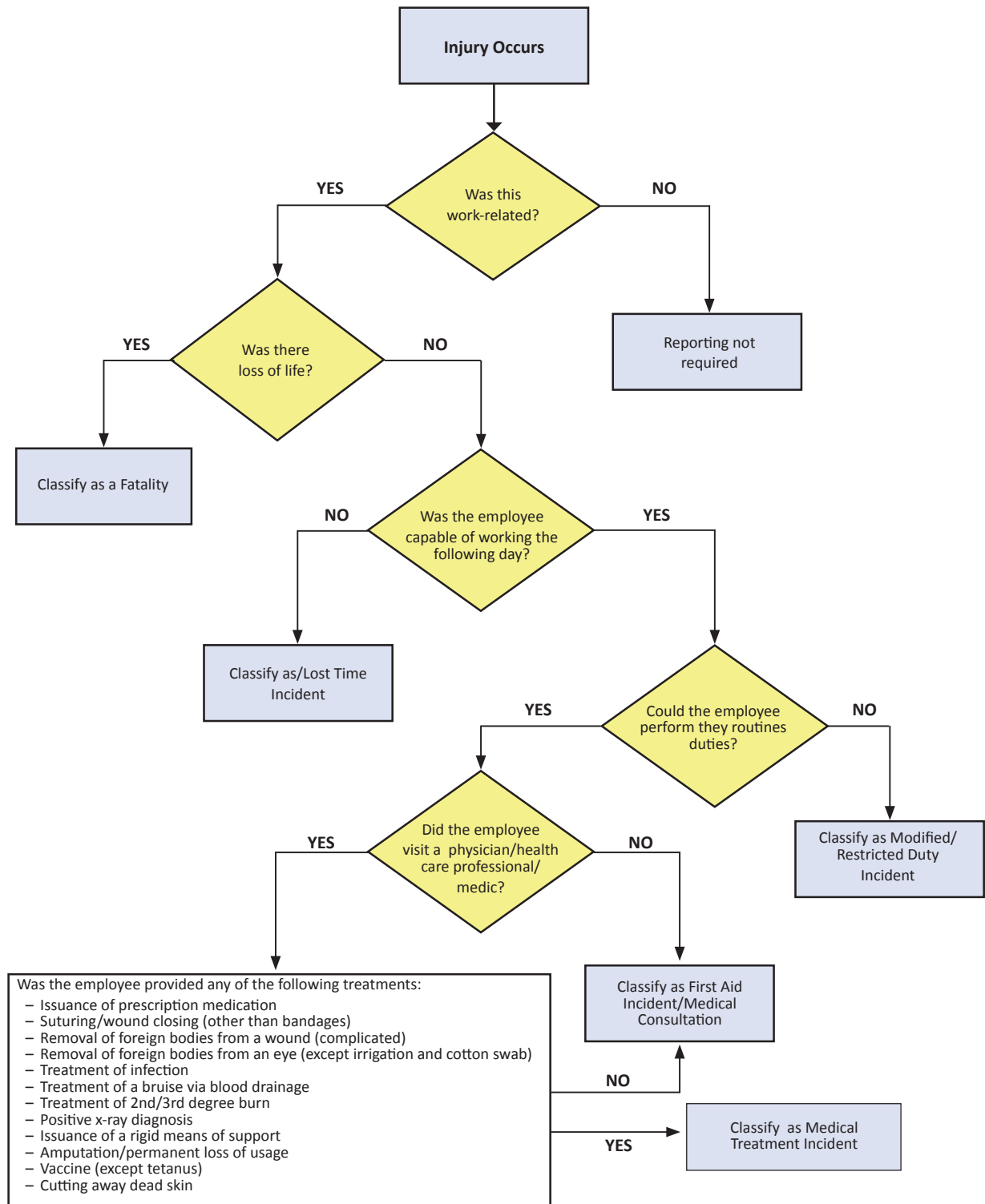
1. Establish that the injury is work-related, resulting from an event or exposure in the work environment.
2. Determine whether a case occurred; that is, has there been an illness or an injury more severe than first aid? *(See Definitions.)*
3. Determine whether the case is an injury or an illness. *(See definitions section to assist in the classification of injuries and illnesses.)*
4. Classify the case as being the most severe of the following:
  - Fatality
  - Lost Time Injury (incurring workdays lost beyond the day of the event)
  - Restricted work
  - Medical Treatment Case *(See definitions section to distinguish medical treatment case from a first aid treatment)*

An injury or illness may progress from a lower category to a higher or more severe category. It shall be reported in the higher category only.

An injury or illness shall be classified according to the treatment rendered or the capability to work rather than time away if an employee is unable to return to the place of work due to travel arrangements.



## Injury Classification



**Note: Record each incident only once, at the highest level of severity, in the quarter in which it first occurred.**

## Record Retention

All completed safety documentation shall be retained for a minimum of three (3) years after the document was created.

The following documents must be kept for at least the following period:

Document	Record Retention Description
Current Training Records and Competency Assessment	Life of the employment
Field Level Hazard Assessment	Two (2) years from date of Assessment
Safety Meetings	Two (2) years from date of meeting
Inspections with no defects	Two (2) years from date of inspection
Inspections with major defects	Five (5) years from date of inspection
Investigation Report and Related Documents	Three (3) years from date of incident
Medical Information	Three (3) years from date of treatment
First Aid Records	Three (3) years from date of incident
Emergency Response Drill	Three (3) years from date of drill
Audiometric Testing	Ten (10) years
Preventative Maintenance Records	Five (5) years from date of activity
MSDS	Thirty (30) years after employee was exposed
Log Books	Six (6) months from date of activity

## Section 13 – Alcohol and Drug Program

### Purpose

Paragon Ventilation Ltd. has a strong commitment to ensure a safe, healthy and reliable work site. This commitment extends to the safety of employees, customers and the general public.

Paragon Ventilation Ltd. employees may work on sites with equipment and material in an environment that can pose a threat to the safety of themselves, their co-workers and others if not handled with the proper care and attention.

Paragon Ventilation Ltd. recognizes that the misuse of alcohol and drugs impairs employee health, productivity and the overall goal of maintaining a safe work environment. Substance abuse issues result in unsafe working conditions for all employees and the public. Paragon Ventilation Ltd. is committed to maintaining a productive, safe, and healthy work environment free of alcohol and drug use.

Paragon Ventilation Ltd. expects all of its employees to report to work Fit for Duty and in good mental and physical condition without being under the influence of alcohol or drugs.

Awareness of the potential risks associated with the use of alcohol or drugs can assist in providing a safe, healthy and productive workplace allowing employees to adhere to Paragon Ventilation Ltd. will: values of people, professionalism and passion. Paragon Ventilation Ltd. will:

- Provide a safe work site.
- Provide advice on prevention programs that emphasize awareness, education and training with respect to the use of alcohol and drugs.
- Assist employees who voluntarily seek assistance for a personal problem in obtaining an assessment, counseling, referral, and rehabilitation services.
- Take appropriate steps to investigate any possible violation of this program.
- Actively support and encourage rehabilitation activities and re-employment opportunities where applicable.
- Provide supervisory training and awareness in addressing the use of alcohol and drugs in the workplace, as required.
- Ensure that all employees understand the existence of and content of this program including the Alcohol and Drug Work Rules.
- Ensure that the alcohol and drug testing is performed according to the standards set out in this program.

### Definitions

The following definitions apply to this Alcohol and Drug Program:

**Alcohol** – Any substance that may be consumed and that has an alcoholic content equal to or in excess of 0.05 percent by volume.

**Company Business** – Refers to all business activities undertaken by employees in the course of the Company's operations regardless of where the activities are conducted.

**Designated Employer Representative (DER)** – An employee authorized by the employer to take immediate action(s) to remove employees from safety-sensitive duties, or cause employees to be removed from these covered duties, and to make required decisions in the testing and evaluation processes. The DER also receives test results and other communications for the employer

**Drug Paraphernalia** – Includes any personal property which is associated with the use of any drug, substance, chemical or agent, the possession of which is unlawful in Canada.

**Drugs** – Includes any substance, chemical or agent where the use or possession of which is unlawful in Canada or requires a personal prescription from a licensed treating physician. This includes any non-prescription medication lawfully sold in Canada.

**Fit for Duty** – The ability to safely and acceptably perform assigned duties without any limitations due to the use or after-effects of Alcohol and/or Drugs.

**Incident** – An occurrence, circumstance or condition that caused or had the potential to cause damage to person, property, reputation, security or the environment.

**Laboratory** – Meets the guidelines and standards of the Standards Council of Canada Laboratory Accreditation Program for Substances of Abuse or Mental Health Services Administration of the U.S. Department of Health and Human Services. Gas chromatography/mass spectrometry is the only authorized confirmation method.

**Medical Review Officer (MRO)** – A licensed physician with knowledge of substance abuse disorders and the ability to evaluate an employee's positive test results. The MRO is responsible for receiving and reviewing laboratory results generated by an employer's drug testing program and evaluating medical explanations for certain drug test results.

**Medication** – A drug obtained over the counter by the employee through a doctor's prescription or through a Health Canada authorization.

**Negative Test Result** – A report from the designated collection agency or from the MOR that the employee who provided a specimen for alcohol and drug testing did not have an alcohol and drug concentration level equal to or in excess of that set out in the Concentration Limit Table of this section.

**Non-Negative Test Result** – A report from the designated collection agency screening test that the employee who provided a specimen for alcohol and drug testing may have an alcohol or drug concentration equal to or greater than that in the Concentration Limit Table of this section and that the specimen must be sent to an accredited lab for confirmation.

**Positive Test Result** – A report from the MOR that the employee who provided a specimen for alcohol and drug testing did have an alcohol or drug concentration level equal to or in excess of that set out in the Concentration Limit Table of this section.

**Reasonable Grounds** – Includes information established by the direct observation of the employee's conduct or other indicators such as the physical appearance of the employee, the smell associated with the use of

alcohol or drugs on their person, or in the vicinity of their person, their attendance record, circumstances surrounding an incident or near miss/potentially serious incident (psi's) and the presence of alcohol, drugs, or drug paraphernalia in the vicinity of the employee or the area where the employee worked.

**Rehabilitation Program** – A program tailored to the needs of an individual which may include education, counselling, and residential care offered to assist a person to comply with the Alcohol and Drug Work Rules.

**Safety Sensitive Position (SSP)** – a position in which individuals have a key and direct role in the operation where performance impacted by the use of alcohol or drugs could result in: An incident affecting the health or safety of employees, customers, the public or the environment.

An inadequate response or failure to respond to an emergency or operational situation.

An incident or practice that could negatively impact the company's financial position or good will in the communities where we operate.

**Substance Abuse Professional (SAP)** – A licensed physician, a licensed or certified social employee, a licensed or certified psychologist, a licensed or certified employee assistance expert, or an alcohol and drug abuse counselor. The SAP has received training specific to the SAP roles and responsibilities, has knowledge of and clinical experience in the diagnosis and treatment of substance abuse-related disorders, and has an understanding of the safety implications of substance use and abuse. For the purposes of this program a Substance Abuse Professional is the same as a Substance Abuse Expert.

**Tamper** – To alter, meddle, interfere or change.

**Work** – Includes training and any other breaks from work while at a Paragon Ventilation Ltd. work site.

**Work Site** – A place at which a person performs work for Paragon Ventilation Ltd..

## Roles and Responsibilities

The successful implementation of this program is the shared responsibility of supervisors and employees.

### *Supervisors*

Supervisors must:

- Be knowledgeable about and comply with this program including the Alcohol and Drug Work Rules.
- Be knowledgeable about the use of alcohol and drugs and be able to recognize the symptoms associated with the use of alcohol and drugs.
- Take appropriate action if:
  - They believe or suspect an employee is not Fit for Duty on the job.
  - They receive a report that an employee is not Fit for Duty on the job.

Supervisors must not:

- Allow an employee to perform their duties where the employee has a confirmed alcohol level equal to or in excess of 0.040 grams per 210 liters of breath or with a drug level equal to or in excess of the concentrations set in the Concentration Limit Table.
  - Permit an employee to perform or continue to perform their duties on the work site when there

is actual knowledge or reasonable grounds to believe that the employee is using alcohol while performing the duties of their position.

- Permit an employee to perform or continue to perform the duties of their position while under the influence of a drug.
- Permit an employee to perform or continue to perform the duties of their position if they are using prescription drugs that may impact their ability to work, except when the use is pursuant to the instructions of a licensed medical practitioner who has informed the employee that the substance will not adversely affect their ability to safely work at the work site.
- Permit an employee who refuses to submit to an alcohol or drug test to perform, or continue to perform, the duties of their position.

### ***Employees***

Employees must:

- Read, understand and abide by this program including the Alcohol and Drug Work Rules.
- Seek advice and follow appropriate treatment if they have a current or emerging problem with alcohol or drugs and follow recommended monitoring programs after attending treatment.
- Encourage peers or co-workers to seek advice and follow appropriate treatment if they have a current or emerging problem with alcohol or drugs.
- Cooperate as required with an investigation into a violation of this program.
- Use medications responsibly, be aware of potential side effects and notify their supervisor of any potential unsafe side effects associated with the use of such medication where applicable.
- Report to work Fit for Duty and remain Fit for Duty while on company business or while at a company work site.
- Report for testing and participate in testing as required and promote the integrity of the testing process without tampering, adulterating or interfering with testing.
- As soon as possible, inform their supervisor if they believe a co-worker is not Fit for Duty on the job or is otherwise in violation of this program.
- When requested, participate fully in required drug and alcohol test for any investigation under this program.
- After being involved in, or observing an incident, an employee must be available to submit to an alcohol and/or drug test. The employee would be exempt from testing if:
  - The employee is informed by the supervisor that they will not be tested.
  - Thirty two (32) hours have elapsed since the incident.

Employees must not:

- Be in possession of, use, or offer for sale alcohol, drugs or drug paraphernalia while on company business or while at any company work site.
- Use, possess, or offer for sale any product or device that may be used to attempt to tamper with any sample for a drug or alcohol test while on company business or at a company work site.

- Report to work or work with an alcohol level equal to or in excess of 0.040 grams per 210 liters of breath or with a drug level equal to or in excess of the concentrations set in the Concentration Limit Table below.
- Report for duty or remain on duty when using any prescription drug which may have potential unsafe side effects, except when the use is pursuant to the instructions of a licensed medical practitioner who has informed the employee that the substance will not adversely affect their ability to safely work at the work site.
- Intentionally misuse medications.
- Refuse to submit to a required alcohol or drug test.
- Tamper with a sample for an alcohol or drug test.
- Operate a motor vehicle while under the influence of alcohol and drug.

***Designated Employer Representatives (DERs)***

The Designated Employer Representatives (DERs) will:

- Administer the Drug and Alcohol Program.
- Be the Liaison with drug and alcohol testing service agents.
- Be informed of every test and its result.
- Perform the functions necessary according to the results of the tests, and are authorized by the employer to take immediate action(s): To remove employees from safety sensitive duties.
- Make necessary decisions in the testing and evaluation process.
- Receive test results and other communications for the employer.

**Alcohol and Drug Work Rules**

- No employee shall distribute, possess, consume or use alcohol or illegal drugs on any company work site.
- No employee shall report to work or be at work under the influence of alcohol, or drugs that may or will affect their ability to work safely.
- No employee shall test positive for any alcohol or drugs at concentrations equal to or in excess of the concentrations set in the Concentration Limit Table.
- No employee shall misuse prescription or non-prescription drugs while at work. If an employee is taking prescription or non-prescription drug for which there is a potential unsafe side effect, they have an obligation to report it to their supervisor.

**Concentration Limits Table**

Substance Tested	Urine Screening (ng/mL)	Urine Confirmation (ng/mL)	Oral Fluid Screening (ng/mL)	Oral Fluid Confirmation (ng/mL)
Cannabinoids	50	15	4	2
Cocaine	150	100	20	8
Opiates	2000	2000	40	40
PCP	25	25	10	10
Amphetamines	500	250	50	25
Methamphetamine	500	250	50	25
Methadone	300	200	60	60
MDMA (Ecstasy)	500	250	50	25
Propoxyphene	300	300	N/A	N/A
Barbiturates	300	200	10	10
Benzodiazepines	300	50	N/A	N/A
Oxycodone	100	100	N/A	N/A
<b>Breath Alcohol Testing</b>	<b>g/L of breath</b>			
Alcohol	0.04/210			

## Implementation of the Alcohol and Drug Program

### **Education**

The likelihood that an employee will comply with the Alcohol and Drug Work Rules is increased if they know the safety risks associated with the use of alcohol and drugs. As a result, Paragon Ventilation Ltd. is committed to informing employees of the existence of this Alcohol and Drug Program and to taking such other steps as are reasonable to inform its employees of the safety risks associated with the risks alcohol and drugs and will help educate.

### **Self Help**

This program encourages employees who believe that they may require the help provided by Substance Abuse Professionals (SAPs) to voluntarily request that help. An employee requesting help will not be disciplined unless they:

- Have failed to comply with the Alcohol and Drug Work Rules outlined in this program.
- Have been requested to confirm compliance with the Alcohol and Drug Work Rules and refused.
- Have been requested to submit to an alcohol or drug test and refused.



An employee who believes that they may be unable to comply with the Alcohol and Drug Work Rules should seek help by:

- Contacting the Alberta Health Services (AHS) at 1-866-332-2322 (Help Line).
- Informing a family member or friend, and/or
- Informing a co-worker, a supervisor, or representative of the company of their wish to contact AHS.

In response to an employee's request for help, management or supervisor must:

- Inform the employee of the assistance available.
- Encourage the employee to utilize the Alcohol and Drug Support services. Contact AHS for more information.
- Inform the employee of any requirements that they must meet before returning to work, which, where appropriate, may include:
  - An alcohol or drug test
  - An assessment conducted by a SAP.
- Inform the employee that failure to meet the requirements may result in the termination of their employment.
- An employee who receives assistance from the support service for their use of alcohol and drugs must comply with the terms and conditions of any alcohol and drug program established to help the employee as a condition of their continued employment.
- All employees including those that are enrolled in an alcohol and drug assistance program or other counselling or treatment program must comply with the Alcohol and Drug Work Rules.

## **Possession of Alcohol or Drugs**

If a company representative has reasonable grounds to believe that an employee, while at a company work site, may possess alcohol or drugs in contravention of the Alcohol and Drug Work Rules, the representative must:

- Request the employee to confirm that they do not have in their possession alcohol or drugs.
- Request the assistance of appropriate authorities to confirm that the employee does not have in their possession alcohol or drugs.
- Explain the reasons for the request.

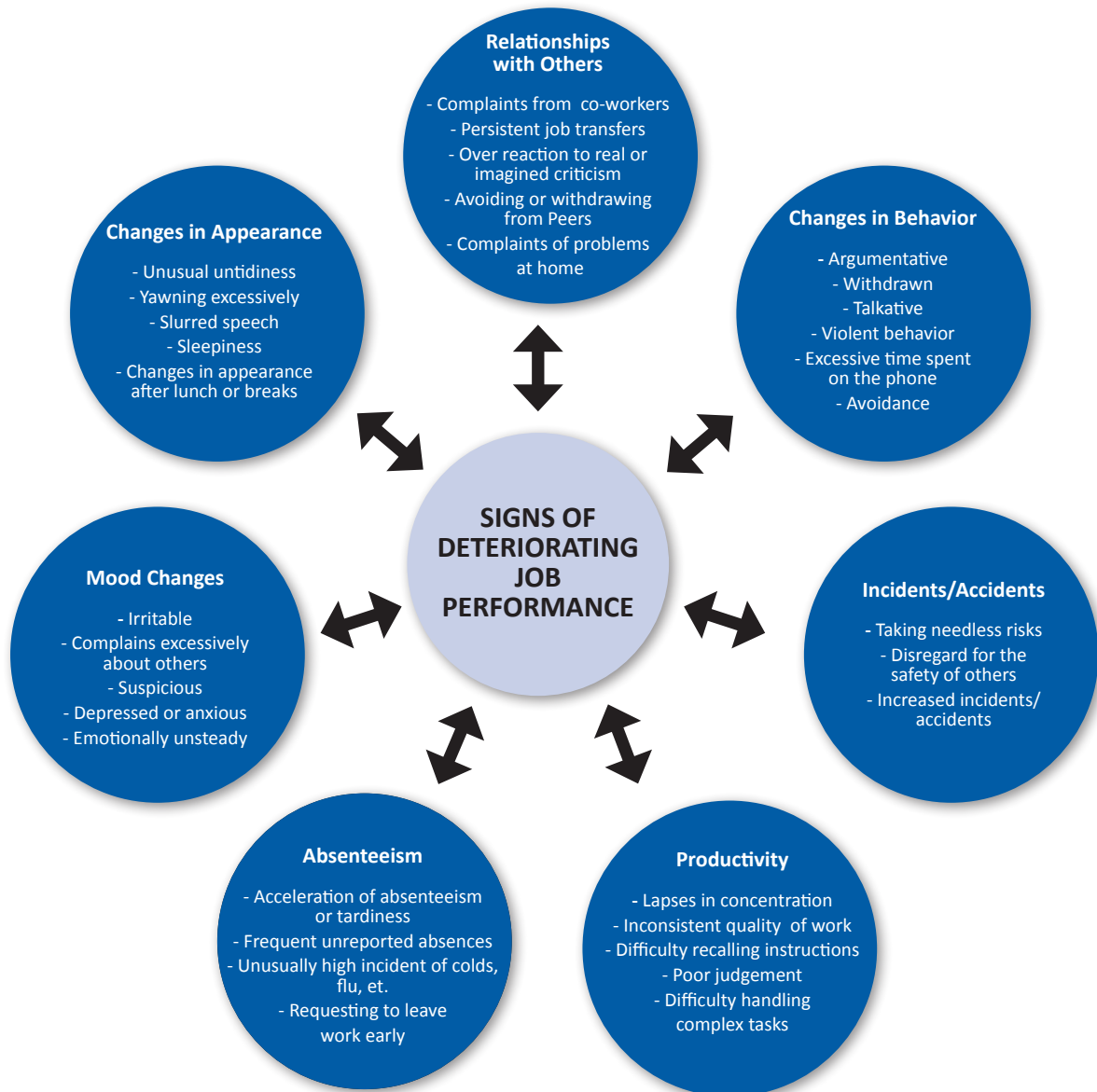
## **Types of Tests**

The following are the type of alcohol and drug tests that an employee may be required to take:

1. Reasonable Grounds Testing
2. Incident and Near Miss/Potentially Serious Incidents (PSI's) Testing
3. Return to Duty Testing
4. Pre-Access/Pre-Placement Testing

### ***Reasonable Grounds Testing***

A supervisor must request an employee to submit to an alcohol or drug test if the representative has reasonable grounds to believe that an employee, while at a company work site, is or may be unable to work in a safe manner because of the use of alcohol or drugs.



***Incident and Near Miss/Potentially Serious Incidents (PSI's) Testing***

A supervisor must request an employee to submit to an alcohol or drug test if the supervisor has reasonable grounds to believe that the employee, while at a company work site, was involved in an accident, a near miss or other potentially serious incident and that the use of alcohol or drugs was a cause of the incident or there is no credible explanation as to how the incident occurred.

A supervisor need not make a request if the supervisor concludes that there are reasonable grounds to believe that the use of alcohol or drugs did not cause the accident, near miss or other potentially serious incident.

***Return to Duty Testing***

Paragon Ventilation Ltd. representative may request an employee to submit to an alcohol or drug test if such a test is required under this program before the employee may be returned to work or if such testing is required in accordance with the terms of a return-to-work agreement.

***Pre-Access/Pre-Placement Testing***

Paragon Ventilation Ltd. representative must request an employee to submit to alcohol and drug tests if the employee will be working at a site requiring pre-access alcohol and drug testing by a third party.

**Documentation**

Supervisors are responsible for monitoring and reporting to management any behaviour consistent with alcohol or drug use.

Supervisor or management who requests that an employee submit to do alcohol or drug test must complete, within a reasonable time of making the request, a report setting out the reason or reasons for making the request.

Document the details to confirm that they do not have alcohol or drugs in their possession.

**Consequences of a Refusal to Submit to an Alcohol or Drug Test**

An employee who refuses to submit to a required test, tampers or attempts to tamper with a test sample or obstructs the testing process will be considered to have had a positive test result.

***Collection of Specimens and Analysis Procedure***

Alcohol and drug testing is conducted to determine the presence of any drugs (or their metabolites) listed in the Concentration Limit Table of this section and alcohol in the specimen provided by the employee.

1. Employees will be asked to provide a sample at a designated collection site or representatives from the collection agency may visit the work site to collect samples and perform screening tests.
2. The designated collection agency will collect and process urine specimens or saliva specimens for further drug screening, and confirmation, as required. Alcohol testing will be with an approved Evidential Breath Testing device. Alcohol breath test will be performed by an approved Breath Alcohol Technician.

3. The laboratory selected by the designated collection agency must meet the guidelines and standards of the Department of Health and Human Services, which is the certifying agency for forensic urine drug testing laboratories in Canada and the United States. Laboratory testing processes follow the U.S. Department of Health and Human Services guidelines.
4. Following proper chain of custody an accredited laboratory will perform required testing procedure for confirmation of screening results when required with confirmed test results forwarded to a Medical Review Officer (MRO).

### **Alcohol and Drug Testing Results**

Alcohol and drug test results can be negative, non-negative, positive, tampered, invalid or inconclusive.

A negative test result means the employee is in compliance; a non-negative means the employee may not be in compliance and the specimen is sent to an accredited lab for confirmation of results. A positive test result means non-compliance, a tampered test result means non-compliance, and an invalid or inconclusive test result cannot be relied upon to determine compliance or non-compliance. All test results will be provided in a confidential written report to the DER.

A result from the designated collection agency to the DER that the employee's sample produced a negative test result means that the employee complied with the Alcohol and Drug Work Rules. The DER must notify the employee of the negative test result and that no other steps under this Alcohol and Drug Program will be taken.

A confidential result from the designated collection agency to the DER that the employee's sample produced a positive test result means that the employee failed to comply with the Alcohol and Drug Work Rules. Unless the MRO has determined that there is a legitimate medical explanation for the positive test result, the positive test means the employee failed to comply with the Alcohol and Drug Work Rules.

A confidential result from the designated collection agency to the DER that the employee's sample has been tampered with means that the employee failed to comply with Alcohol and Drug Work Rules.

### **Consequence to Non-Compliance with the Alcohol and Drug Work Rules**

Paragon Ventilation Ltd. may discipline, or terminate for cause, the employment of an employee who fails to comply with the Alcohol and Drug Work Rules. The appropriate consequence depends on the facts of the case, including the nature of violation, the existence of prior violations, the response to prior corrective programs and the seriousness of the violation.

Employees who test Non-Negative on a Drug Screening Test will be removed from their duties and suspended without pay until results of the drug test can be confirmed by an accredited lab and reviewed by a MRO.

An applicant who has tested positive in a pre-placement test will not be hired if a negative drug test is a condition of employment. This will not affect future applications and an applicant may re-apply after 90 days.

If the confirmation test indicates the presence of controlled substances the results shall be reviewed by the MRO. The MRO will contact the employee. The employee has seventy-two (72) hours from official notification to request that the split specimen be analyzed by a different certified lab. The employee

is responsible for the costs of the split specimen test performed at their request. If and when the split specimen analysis fails to confirm the presence of controlled substances, the employee shall be considered not to have violated this program.

Employees with a confirmed positive drug test will be suspended without pay and notified of support. The SAP shall make an initial assessment of the employee and make appropriate recommendations. The employee shall, through the SAP, provide to the company a confidential report of their initial assessment and recommendations. This initial assessment is to be completed as soon as possible and the report shall be delivered to the DER within two days of completion. Failure by the employee to attend the assessment or follow the course of corrective or rehabilitative action shall be cause for termination of employment.

Employees with a confirmed alcohol concentration of 0.04 or higher will be suspended without pay and referred to a SAP. The SAP shall make an initial assessment of the employee and make appropriate recommendations. The employee shall, through the SAP, provide to the company a confidential report of their initial assessment and recommendations. This initial assessment is to be completed as soon as possible and the report shall be delivered to Paragon Ventilation Ltd. within two days of completion. Failure by the employee to attend the assessment or follow the course of corrective or rehabilitative action shall be cause for termination of employment.

In order for this program to be effective in ensuring that employees will perform duties of their position, unimpaired by alcohol or drugs, the provisions of this program must be enforced. Accordingly, where an employee violates any provision(s) of this program, the employee will be subject to corrective disciplinary action, as appropriate, up to and including termination.

### **Return to Work After Positive Test**

An employee will not be returned to the duties of their position until they have been evaluated by a SAP, complied with recommended rehabilitation and have a negative result a return-to-duty drug and alcohol test. The employee must provide a written report from the DER verifying the required evaluation, recommendation, rehabilitation, and provide documentation of the required information.

Follow-up testing to monitor the returning employees will be conducted depending on the SAP's recommendations.

### **Confidentiality**

All alcohol and drug test results are confidential and are released to the DER only. All alcohol and drug medical information will be kept separate from the employee's normal employment files and access will be limited to designated personnel only. The DER may release relevant information to company decision makers as required. Confidential information from a SAP will be handled in a similar manner.

## Section 14 – Fit for Duty Program

### Purpose

Paragon Ventilation Ltd. is committed to ensuring that all individuals are fit for work while they are on Paragon Ventilation Ltd. projects or undertaking activities on Paragon Ventilation Ltd. behalf.

The Fit for Duty Program defines responsibilities of employees. The program promotes fitness for work and how to effectively and appropriately manage fitness for work issues including, but not limited to:

- Fatigue
- Stress
- Physical, emotional and mental well-being
- Medical issues
- Rehabilitation
- Alcohol and drugs

The intent of this program is to provide and promote a safe working environment by:

- Improving and maintaining fitness for work.
- Improving and maintaining an awareness of fitness for work responsibilities.
- Providing appropriate assistance to overcome problems that could impair fitness for work.
- Monitoring compliance with, and enforcement of, this program and its procedures including the requirements of the Alcohol and Drug Program.
- Providing effective, fair and constructive procedures for dealing with people who are unfit for work.

This program is incomplete without the entirety of the HSE manual. This program should be read and understood in conjunction with all other policies and procedures from the HSE manual including the Alcohol and Drug Program, Fatigue Management and any program, procedure or practice that requires personal assessment (i.e., Respiratory Protective Equipment fit testing, Disability Management, etc.).

### Definition

**Fit for Duty** – An Individual who is in a state (i.e., physical, mental and emotional) which enables them to perform assigned tasks competently and in a manner which does not compromise or threaten the safety or health of themselves or others.

### Roles and Responsibilities

#### *Senior Management*

Senior Management's responsibilities within the Fit for Duty Program include, but are not limited to:

- Ensure a process is in place for the adoption and implementation of the Fit for Duty Program
- Ensure a process is in place for Supervisors to be trained in the implement the program.
- Supply adequate resources for the requirements of this program.
- Protect the fair and consistent application of this program.

- Ensure the appropriate procedures are implemented to safeguard sensitive medical and other personal information.
- Lead by example by arriving at work fit for duty.

### ***Management***

Management's responsibilities within the Fit for Duty Program include, but are not limited to:

- Adapt, implement and apply all areas of this program.
- Confirm Supervisors are trained in the implementation of this program.
- Supply adequate resources to meet the requirements of this program.
- Protect the fair and consistent application of this program.
- Apply the appropriate procedures and implements safeguards for sensitive medical and other personal information.
- Monitor employees for unsafe behaviours and take prompt and appropriate action whenever they believe that any employee is not capable of working in a safe and effective manner, up to and including removing them from the job necessary.
- Lead by example by arriving at work fit for duty.

### ***Supervision***

Supervision's responsibilities within the Fit for Duty Program include, but are not limited to:

- Lead by example by arriving at work fit for duty.
- Lead the effective implementation of this program including raising concerns about other employee's fitness for work.
- Conduct an assessment of the fitness for work of employees both at the start of, and throughout, the workday.
- Take prompt and appropriate action to evaluate if an employee is not capable of performing their duties in a safe and effective manner, up to and including removing them from the job site if necessary.
- Take all necessary actions to safeguard sensitive medical and other personal information.
- Lead by example by arriving at work fit for duty.

### ***Employee***

Employee's responsibilities within the Fit for Duty Program include, but are not limited to:

- Be fit for work to avoid adversely affecting the health and safety of any other employee.
- Demonstrate that they are fit for work if they are requested by management or supervisor.
- Report any actual or potential impairment of fitness for work or breaches of non-compliance with this program.
- Report to their supervisor if they believe they may be unfit for work.
- Inform their supervisor if they are taking any medication (i.e., prescription or over the counter), have a medical condition, or have a personal illness that could have an impact on fitness for work.

- Provide a medical certificate or release when applicable. This may include a physician's assessment of the impact of any or all medication on fitness for work.
- Demonstrate they are competent/qualified, and physically capable to perform their job.

## **Assessment**

Methods include:

- Face to face discussions with Supervisors and employees at the start of, and during, the work period
- Medical assessments
- Alcohol and drug testing
- Other recognized assessments as appropriate

## **Impact to Fitness to Work**

### ***Alcohol and Drug***

Paragon Ventilation Ltd. expects all of its employees to report to work fit for duty and in good mental and physical condition without being under the influence of alcohol or drugs.

### ***Fatigue***

Paragon Ventilation Ltd. expect employees and supervisors to have an understanding of their needs to prevent themselves from being fatigued, such as determining how much sleep is needed to feel refreshed and healthy the next day.

### ***Injury or Illness and Return to Work***

When an injured employee returns to work after a fitness for work issue, they are medically certified physically and/or psychologically capable of carrying out the duties proposed for them. An injury management and return to work plan shall be implemented if return to work issues are identified and supported by appropriate medical opinion (*see Disability Management*).

### ***Work Hazards***

Fitness for work considerations shall include both risks inherent in the work itself and other reasonably foreseeable hazards that may be associated with, but not directly involved in, the work (e.g. weight and/or fitness issues associated with emergency evacuation requirements).

### ***Work Periods***

All employees are required to adhere to regulatory standards for work hours, workdays, periods of rest, days of rest and commercial vehicle hours of service for both provincial and federal as applicable. Employees will adhere to jurisdictional legislation with regards to hours of work and periods of rest.

Fatigue minimization shall be included when setting work shift patterns. In particular, minimum breaks between employee work shifts and between sequences of work shifts shall be incorporated.



## Section 15 – Fatigue Management

### **Purpose**

The purpose of this program is to inform employees of what fatigue management and how to recognize it, as well as how to control it through work/personal habits and fatigue reporting.

### **Definitions**

**Fatigue** – The feeling of extreme tiredness or exhaustion causing increased difficulty in performing mental or physical activities or tasks.

**Circadian Rhythm** – The natural pattern of physiological and behavioral processes within a 24-hour period. It includes the body's sleep and wake cycles, body temperature, blood pressure and release of hormones.

**Sleep-Wake Cycle** – Biological pattern of alternating sleep and wakefulness, in humans this is roughly 8 hours of nocturnal sleep and 16 hours of daytime activity.

### **Roles and Responsibilities**

#### ***Management***

Management's responsibilities within the Fatigue Management Program include, but are not limited to:

- Take into account the employee's needs regarding fatigue, industry requirements and competitiveness when creating work schedule. The schedule will be cost efficient, both directly (labor costs) and indirectly (absenteeism, turnover, incidents), and effective in terms of how employees adjust to their schedule.
- Verify supervisors are trained on how to recognize fatigue and how to prevent it or counteract it.

#### ***Supervision***

Supervision's responsibilities within the Fatigue Management Program include, but are not limited to:

- Investigate reported incidents of employees working while fatigued.
- Understand and be able to recognize fatigue and its symptoms.
- Enforce the Fatigue Management Program.
- Evaluate each task periodically for fatigue hazards such as work type, length of task and workplace conditions to minimize fatigue.
- Set work hour limitations.
- Set a job rotation, if required.
- Consider rest periods between workdays, shifts or on-call time.

#### ***Employee***

Employee's responsibilities within the Fatigue Management Program include, but are not limited to:

- Immediately report it to their supervisor when feeling fatigue.

- Never operate any vehicle or equipment when feeling fatigued.
- Have an understanding of their needs to prevent themselves from being fatigued, such as determining how much sleep is needed to feel refreshed and healthy the next day.

## **Assessment of Fatigue**

Supervisors who suspect that an employee is too fatigued to perform their work safely, will conduct an Employee Fatigue Hazard Assessment. Questions that will be asked to determine an employee's level of fatigue could be:

- How many hours did the employee work in the past week?
- What is the pattern of hours worked in the past week?
- Do environmental factors pose an additional work load?
- Does the employee's condition match the mental, physical and emotional demands of the work?
- What is the physical intensity of the work?
- Does the employee's physical fitness match the work demands?
- Is the employee required to work at a time out of sync with the sleep-wake cycle of the employee's circadian rhythm?
- Is the employee experiencing life stressors outside of work?
- How well has the employee coped with stress in the past?
- Does the employee get support at work and at home?

Supervisor is to complete a standard assessment of fatigue checklist to create a consistent approach to assessing fatigue.

## **Components of Managing Fatigue**

### ***Recognizing Fatigue and Symptoms***

Acute fatigue is caused by immediate episodes of sleep deprivation such as long periods of wakefulness from excessively long shifts or night shifts without adequate daytime rest.

Ongoing sleep disruption can lead to sleep depth and chronic sleep deprivation which results in:

- Muscular weakness
- Tiredness in everyday activities
- Reduced coordination and alertness

Fatigue can also result in long-term health problems such as:

- Digestive problems
- Heart disease
- Stress
- Mental illness

***Personal Limitations Caused by Fatigue***

- The chance of incidents increases
- Regular absenteeism increases
- Tendency to work at a slower pace
- Tendency to rely on others to get tasks completed

***Hazards of Working While Fatigued***

- Inability to see properly
- Slower reflexes and reactions
- Micro-sleeps (up to 60 seconds where the brain goes to sleep and the employee blacks out no matter what they are doing)
- Automatic behavior (where the employee does routine tasks but is not having any conscious thoughts)
- Inability to make good decisions or plans
- Inability to solve problems
- Inability to concentrate, including wandering thoughts
- Decreased alertness and watchfulness
- Inability to remember activities just completed, seen or heard
- Inability to notice details the employee normally would
- More mistakes than usual
- Failure to respond to changes in surroundings or situations
- Poor logic and judgment, including taking risks the employee normally would not take
- Inability to respond quickly or correctly to changes
- Inability to communicate well
- Inability to handle stress
- Moodiness

***Controlling Fatigue***

Besides not getting the appropriate amount of sleep, fatigue can also be caused by work site factors such as:

- Work scheduling
- Work task type and length
- Employee health and stress
- Work site safety culture
- Shift Work

Shift work is sometimes more favorable on certain jobsites, but shift work also effects a person's circadian rhythm which can disrupt their sleeping pattern resulting in fatigue.

When creating a schedule, Paragon Ventilation Ltd. will take into account strategies to try and help make shift work less intrusive to natural sleep habits and social activities. Some of these strategies include:

- Having the shift end at a time when the shift employee can still get sleep during “normal” sleep time.(i.e., 10 am -6 pm; 6 pm - 2 am).
- Staggering the length of the shift (i.e., Day shift-10 hours, Afternoon shift-8 hours, and night shift only 6 hours).
- During an employee’s shift, Paragon Ventilation Ltd. will provide sufficient breaks to allow for rest and recovery.
- Collecting input from employees to determine what they find easier to adjust to.

It is important for employees to have quality time off. For that reason, consecutive days off are ideal. Work schedules involving night shifts must designate recovery time into the off-duty pattern so there is sufficient opportunity for rest and recuperation following the night shift.

## **Training**

Employees and supervisors are to be provided training on fatigue management including how to recognize fatigue, how to control fatigue through appropriate work and personal habits and fatigue reporting.

## Section 16 – Workplace Violence and Harassment Program

### Purpose

The purpose of this program is to maintain a work environment that is free from violence, harassment and any retaliation for reporting incidents. Paragon Ventilation Ltd. recognizes the potential for workplace violence, harassment or other aggressive behavior directed at employees working on Paragon Ventilation Ltd. behalf will not tolerate behavior from anyone who intimidates, threatens, harasses, abuses, injures or otherwise victimizes employees and will take appropriate steps to protect them from the potential risks associated with workplace violence or harassment. Complaints will be investigated and resolved quickly and confidentially. All subcontractors working on Paragon Ventilation Ltd. behalf will be aware of and comply with the company's program or have their own program in place.

This program prohibits all forms of bullying, harassment and violence (hereinafter, referred to as a violation of "respect") by managers, supervisors, employees, suppliers, visitors and clients. Violations of respect will be investigated and, if substantiated, will be dealt with expeditiously. Violations of respect will not be tolerated and appropriate disciplinary action, up to and including termination, will be taken.

To support the objective of providing all employees with a healthy, safe work site, it is required that supervisors and employees take preventative action to ensure that risks to individual's health and safety due to violations of respect, are eliminated and reported. Victims of workplace violence or harassment are advised to consult a health professional. Follow-up counseling services may be provided and arranged by the employee's supervisor when requested.

The Workplace Violence and Harassment Program shall be posted in the workplace.

### Definition

**Bullying** – Interpersonal hostility that is deliberate, repetitive and aimed at targeting an individual's health, safety or economic status.

**Harassment** – Occurs when an employee is subjected to unwelcome verbal or physical conduct because of:

- Race
- Age
- Religious beliefs
- Color
- Place of origin
- Gender
- Mental or physical disability
- Ancestry
- Marital status
- Sexual orientation
- Source of income
- Family status of that person or of any other person

**Racial and Religious Harassment** – Behaviour that is disrespectful or causes humiliation to a person because of their race, colour, nationality, ethnic origin or the adornments and rituals associated with religious beliefs. This includes, but is not limited to:

- Slurs
- Gestures
- Name calling
- Swearing
- Taunts about an employee's religious or racial background
- Unwelcome banter, teasing or jokes those are insulting to the individual's race or religion

It can also include the display of racist, derogatory or offensive pictures, materials or graffiti as well as refusing to work with or have eye contact with employees on the job because of their religious background.

**Retaliation** – Retaliation includes harassment, demotion, unwanted transfer, denial of opportunities within Paragon Ventilation Ltd. or termination that is related to an individual's involvement in the complaint process.

**Sexual Harassment** – A form of discrimination based on gender. It is offensive, degrading, threatening and unlawful. Sexual harassment is defined as unwelcome sexual conduct which includes unwanted sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature. The behavior need not be intentional in order to be considered sexual harassment. Some examples are:

- Pinching
- Patting
- Rubbing
- Leering
- Inappropriate remarks or lewd comments
- "Dirty" jokes, pictures, materials, comments, suggestions or innuendos
- Requests or demands of a sexual nature

**Violence** – Violence is the threatened, attempted or actual conduct of a person that causes, or is likely to cause, physical injury. These acts include:

- Threats, menacing or threatening behavior and all types of physical or verbal assaults.
- Argumentative behaviour in which threats are perceived or implied but are not overt.
- Unusual, bizarre or menacing behaviour intensely focused on a grudge or grievance.
- Direct or indirect threats of harm or violence or intentional damage targeting personal or company property.
- Menacing with a fist or brandishing a weapon.
- Low-level physical assault such as prodding, poking or pushing.
- Physical violence; striking at another with a fist or weapon.
- Throwing an object with the intent to strike.

## **Roles and Responsibilities**

### ***Management***

Management's responsibilities within the Workplace Violence and Harassment program include, but are not limited to:

- Verify that supervisors have implemented preventative measures to safeguard employees from injury as a result of incidents of workplace violence.
- Investigate all reports of workplace violence/harassment and keep all information confidential.
- Ensure a process in place to maintain confidentiality of information obtained from workplace violence and harassment investigations.

### ***Supervision***

Supervision's responsibilities within the Workplace Violence and Harassment program include, but are not limited to:

- Implement a strategy for the training to educate workers on the components of the Workplace Violence and Harassment program.
- Not disclose confidentiality information unless information is required for the workplace violence and harassment investigation.
- Assist in investigation of complaints of workplace violence and harassment.
- Advise employees to consult a health professional of the employee's choice for treatment or referral, if required.
- Discipline employees who retaliate against a co-worker who exercises their rights under this program.

### ***Employee***

Employee's responsibilities within the Workplace Violence and Harassment program include, but are not limited to:

- Actively participate in training so as to understand the components of the Workplace Violence and Harassment program.
- Seek resolution of the incident.
- Report all incidents of workplace violence or harassment to their supervisor or management.
- Assist in investigation of complaints of workplace violence and harassment.
- Not disclose confidentiality information unless information is required for the workplace violence and harassment investigations.
- Consult a health professional of their choice for treatment or referral, if required.
- Not retaliate against a co-worker who exercises their rights under this program.

## Sources of Violence

Violence can occur for many reasons. There are four main sources that may cause acts of violence to occur in the workplace which are:

- **Employees and Co-Workers** – Individuals who have an employment-related relationship with the work site victim. Current or former employees are included.
- **Customers/Clients** – Individuals who are recipients or providers of a product or a service provided by the affected work site or victim.
- **Worker-Related Outsider** – Individuals who are possibly a current or former spouse, a relative, acquaintance or some other person who has a dispute involving an employee of the work site.
- **Outsiders** – Individuals who have no legitimate relationship with the work site or the victim and sometimes only enter work sites to commit criminal acts.

## Recognizing the Potential for Violence

Recognizing signs of potential violence through observed changes in behaviour and physiology:

- Person is tense, clenched fists, aggressive stance, reddening of the facial skin and eyes and obvious protrusion of blood vessels in the neck.
- Loud and aggressive tone of voice, speaking quickly, accusatory comments and verbal hostility.
- Difficulty remaining in control.

## Dealing with Violence

When confronted with the possibility of violence:

- Focus attention on the person
- Do not stare or glare at the person
- Remain calm.
- Be conscious about words spoken
- Avoid technical jargon; speak simply
- Listen carefully and do not interrupt
- Encourage the person to talk
- Remain objective
- Use silence as a calming tool
- Acknowledge the other persons feelings (i.e., person is upset, etc.)

## Training

Employees shall be trained in:

- How to recognize workplace violence & harassment.
- The program, procedures, and work site arrangements that effectively minimize or eliminate workplace violence & harassment. The appropriate response to workplace violence & harassment, including how to obtain assistance, and procedures for reporting, investigating, and documenting incidents of workplace violence & harassment.



## **Counselling**

Employees shall be advised to consult a health professional of the employee's choice for treatment or referral if the employee:

- Reports an injury or adverse symptom resulting from workplace violence.
- Is exposed to workplace violence.

## **Investigation**

Investigations will be conducted with confidentiality. Investigators will inform employees involved or consulted through the course of the investigation that discretion is an important part of the process.

Persons found in violation in this program may be subject to corrective action including, but not limited to:

- Take an applicable awareness course
- Attend counselling courses as directed by management
- Participate in mediation
- Receive progressive discipline

## **False Complaint**

There shall be no adverse job consequences against any person for notifying management of a violation of this program unless an investigation determines that the person intentionally fabricated the complaint against the accused. Complaints that are made in bad faith, are malicious or frivolous are considered serious and will result in discipline.

## **Retaliation**

There shall be no retaliation from co-workers directed at an individual making a complaint. In the event it is found that retaliation against an employee who exercises their rights under this program has occurred, severe discipline up to and including termination will be imposed.

## **Confidentiality**

Information about an incident or threat will be disclosed only on a need-to-know basis to ensure a fair and thorough investigation is conducted and appropriate corrective action is taken. Paragon Ventilation Ltd. will make every effort to ensure the safety and privacy of the individuals involved. All complaints shall be kept in confidence.

## **Review and Update**

The Workplace Workplace Violence and Harassment Policy/program is to be reviewed:

- every three years by management.
- At the request of the Joint Health and Safety Committee.
- After any incident involving workplace violence or harassment.

Any changes to the V&H program will be reviewed by all staff via toolbox meeting or safety meeting.

Last Reviewed by Management- June 19, 2025

Last Reviewed by JHSC- Aug. 18, 2022

Effective Date: October 4, 2016

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## Section 17 –Working Alone Program

### Purpose

Paragon Ventilation Ltd. shall ensure that when individuals are working alone or in isolation, and assistance is not readily available in the event of an emergency (including injury or illness), a personnel check system will be in force to provide an appropriate means of communication and assistance in order to protect the safety of the individual.

Paragon Ventilation will take all reasonably practicable steps to eliminate or reduce the hazards associated with the conditions and circumstances of the employee work or the isolation of the worksite.

Paragon Ventilation Ltd. will ensure that a proper communication system be followed by its management, supervisors, and employees when it has been determined that a working alone situation exists on the worksite or worksite isolation exists.

### Definition

**Working Alone** – the individual is working by him or herself and in circumstances or areas where assistance is not readily available in the event of an injury, illness or emergency. Working alone is considered a hazardous task.

### Roles and Responsibilities

#### *Management*

Management's responsibilities within the Working Alone Program include, but are not limited to:

- Confirm that the risk arising from working alone are identified through the Hazard Assessment and Control process, prior to work commencing.
- Review the working alone procedures/systems are reviewed at least annually or more frequently if there is a change in work arrangements.

#### *Supervision*

Supervision's responsibilities within the Working Alone Program include, but are not limited to:

- Ensure employees are following a documented check in and out process based on the risks associated with the job.
- Verify the training or experience, or other standards of competency for the employee working alone and the dispatcher.
- Ensure an effective communication system is employed based on the hazards identified.

### ***Dispatcher***

Dispatcher's responsibilities within the Working Alone Program include, but are not limited to:

- Record all information of employees checking in, including:
  - Employee's name
  - Current task or activity
  - Intended destination
  - Estimated travel time and duration
  - Cellular phone number
- Initiate a follow-up by calling the contact number if the employee has not called by the expected check in time.
- Determine whether there is cell phone coverage in the area the person is working if there is no contact. Is it possible for the person to call out?
- Contact the last known and next party the employee was scheduled to visit.
- Initiate a search as directed by the supervisor.
- Make the decision whether or not to initiate the search, based on:
  - The degree of hazard associated with the job or task the employee was undertaking.
  - The extent to which changing conditions make a search more critical (i.e., weather, darkness, etc.).

### ***Employee***

Employee's responsibilities within the Working Alone Program include, but are not limited to:

- Follow the documented checking in / out procedure based on the risks associated with the job.
- Do not perform the working alone task without proper means of communication and communication system in place.

## **Communication Requirements**

Supervisor will determine a proper communication system be followed by foreman and employees when it has been determined that a working alone situation exists on the worksite or worksite isolation exists.

Communication process will include at a minimum:

- The time interval between checks and the procedure to follow in case the individual working alone cannot be contacted including provision for emergency rescue. High risk activities require shorter time intervals between checks. This communication must be performed at a minimum of:
  - Every one (1) hour interval, dependent upon the nature of the hazard associated with the individual's work.
  - Should electronic communication not be practicable, the supervisor will either assign a competent person to check the well-being of the individual working alone at appropriate time intervals, or instruct the individual working alone to maintain contact at designated intervals dependent upon the associated hazards.

- An effective method of communicating with an individual such as radio, telephone or cellular phone. Any other means of electronic communication in view of the risk involved.
- On an ongoing basis, supervisors will review Paragon Ventilation Ltd. working alone requirements on various work sites and make findings known to the management and employees directly involved with the worksite location.
- Employees and supervisors will document the communication when a working alone condition exists

## Communication Procedure

1. Employee will verify that the proper means of communication is available.
2. Employee will check in with dispatch prior to leaving home base.
3. Employee will give the dispatch an estimated time of arrival.
4. After arriving at destination, employee will again check in with dispatch to advise that they are on location.
5. If the employee is on location for a period of longer than 1 hour, they will check in with dispatch every 1 hours while on location.
6. Prior to leaving location, employee is required to notify dispatch that the job is complete and they are leaving location and estimated time of travel.
7. Report any changes to your itinerary immediately to your supervisor.
8. Employee is to notify dispatch when arriving back at home base.

**Note:** If you forget to check in when required, immediately contact your supervisor.

## Training

Any individual required to work in these circumstances must be made aware of the hazards and trained in proper procedures and practices to reduce the potential risks. It is imperative that the individual understand the requirements when working alone and follow check in requirements.

Any person assigned to check on an individual working alone must be competently trained in the practices and procedures as well.

## Section 18 – Journey Management

### **Purpose**

A Journey Management Plan will be used by Paragon Ventilation Ltd. employees to determine the hazards associated with road travel on a driver's journey and identify what precautions must be taken by the driver to ensure they will arrive safely at their destination.

### **Roles and Responsibilities**

#### ***Supervision***

Supervision's responsibilities within the Journey Management program include, but are not limited to:

- Support the employee in meeting the requirements of any journey management plan.

#### ***Employee***

Employee's responsibilities within the Journey Management program include, but are not limited to:

- Provide the supervisor with the following information:
  - Description of the vehicle
  - Route and final destination
  - Location of overnight stop
  - Estimated arrival time and how the driver will make notification that the journey is complete
  - Who should be notified if contact at the agreed upon time(s) is not met

### **Types of Journey Management**

**Safety Journey Management** – Transportation in areas that are considered high-risk environments. High risk areas are determined by assessment of hazards at the work location.

**Generic Journey Management** – Journey travelled more than 400 km (250 miles) or 4.5 driving hours from home office.

### **Screening Criteria for Journeys**

A Journey Management Plan should be implemented before a journey begins when any one of the following criteria may be encountered during the journey:

- Total driving time is more than 4.5 hours or the distance is greater than 400 km (250 miles), whichever comes first. Drivers will plan rest stop(s) for the journey (Generic Journey Management).
- Significant driving hazards are identified for the intended route (i.e., potential adverse weather/ road conditions, poor road quality, high traffic volume, remoteness, etc.). The driver and supervisor need to ensure that proper safety equipment is available for the journey (Safety Journey Management).

Employees need to consider the following control measures to mitigate the risk of a journey:

- Driving should be avoided if the weather conditions are too adverse.
- To decrease travel time, only necessary trips should be taken and, if possible, trips should be combined to further reduce road travel.
- If the proposed trip may require a significant amount of night driving, proper vehicle lighting must be attached to the vehicle to suit the road conditions
- If driving conditions warrant (i.e., weather, dirt roads, etc.), then an appropriate vehicle or traction aids should be selected based on a Hazard Assessment.
- Drivers should always have a reliable method of communication especially when driving through rural areas (i.e., cell phones, CB radio, etc.).

## **Developing the Journey Management Plan**

Prior to starting their journey, workers should consider what could go wrong during the journey. In doing so workers should:

- Determine what emergency response facilities are along the route.
- Determine when travel is to take place. Preferably travel should be done during daylight hours rather than after dark whenever possible.
- Assess what type of emergency materials and supplies need to be carried on the journey.
- Have maps and driving directions when driving to unfamiliar places.
- Ensure vehicles are equipped with emergency roadside kits, supplies, and equipment such as water, food, first aid kit, spare tires, etc.
- Complete the Journey Management Plan including the following:
  - If and when to drive and specify that not one day of driving exceeds 10 hours.
- What route to take.
- Where to make stops (rest every 4.5 hours).
- What vehicle to use and the proper preparation of that vehicle.
  - The required driver skills and competency.
- Supervisor will review, approve, log, file and monitor the Journey Management Plan.
- Prior to executing the journey the driver needs to be fully briefed on the journey, the associated risks and mitigating measures as set out in the Journey Management Plan.

## **Executing the Journey**

In order for the Journey Management process to be effective, drivers must:

- Depart on time.
- Follow the agreed route and do not take short cuts.
- Take rest breaks at the planned locations to reduce fatigue.
- Make their overnight stop at the planned location and contact their supervisor if they are delayed, forced to deviate from the route, when they arrive at their overnight stop, and when they reach the final destination.

Drivers are responsible for carrying out journeys in-line with the agreed Journey Management Plan.

### **Close-out Journey**

To improve the Journey Management process for future trips, the estimations for the journey should be reviewed by the supervisor and driver. In particular, the following questions should be asked:

- Were the roads and conditions as predicted?
- Were the estimated average speeds realistic?
- Were rest areas, fuel availability and overnight accommodations as anticipated?
- Was there evidence of emergency response services?
- Were there any surprises or incomplete information not shown on the maps?

This process confirms whether or not the objectives of the journey were met and helps Paragon Ventilation Ltd. improve the Journey Management Plan process for future journeys.

### **Training**

Employees and Supervisors are to be trained on the Journey Management Program from assessing the requirement for a plan to the execution of the plan.

## Section 19 – Transportation - Light Vehicles

### Purpose

This program applies to all operators of vehicles owned, leased or operated by Paragon Ventilation Ltd and can include all employee vehicles for which an hourly or monthly allowance is paid, or for personal vehicles used for Paragon Ventilation Ltd business.

Vehicles owned and operated by Paragon Ventilation Ltd will be operated in accordance with all Federal and Provincial regulations. Documents, records, and files pertaining to the operation of commercial vehicles will also be retained in accordance with these regulations. Vehicle damage is preventable and will be reported. Prevention of these incidents is a shared responsibility among management, employees, customers and the public.

### Definitions

**Driver** – Employee with care, custody and control of vehicles, or combinations of vehicles, registered for a weight less than 11,794 kg. All vehicles owned, leased or operated by Paragon Ventilation Ltd.

**Commercial Driver** – Employee with care, custody and control of vehicles, or combinations of vehicles, registered for a weight greater than 11,794 kg. All vehicles owned, leased or operated by Paragon Ventilation Ltd.

**Vehicle Incident** – All incidents involving any vehicle owned, leased, rented, or sub-contracted by Paragon Ventilation Ltd and can include all employee vehicles for which an hourly or monthly allowance is paid.

**Serious Vehicle Incident** – Any incident that must be reported to Police, (OH&S) and other Regulatory:

- Incidents that result in moving traffic violations under the Highway Traffic Act
- Incidents that result in charges under the Criminal Code of Canada
- Incidents that result in an injury classified as Lost Time, Modified Work or Medical Aid for any employee at the work site
- Incidents that result in environmental, property damage, equipment damage, cargo damage or other loss in excess of \$5,000.00

### Vehicle Assignment

- Vehicles owned, leased or operated by the company will only be assigned to approved drivers.
- Hourly employees assigned vehicles will complete a vehicle use agreement.

### Driver Selection and Approval

The selection of competent drivers forms the basis for success of the Health and Safety Management System (HSE-MS). It must conform to Paragon Ventilation Ltd standards, the requirements under the local, provincial and federal standards as well as industry standards for vehicle operators.



Drivers are selected based on their experience with similar work, technical knowledge, physical ability to complete the task and a safe attitude toward vehicle operations. To be approved to operate a vehicle owned, leased or operated by Paragon Ventilation Ltd, a driver will:

- Be a current Paragon Ventilation Ltd employee.
- Possess a valid license of the appropriate class and conditions for the vehicle they are hired or required to operate.
- Provide a Driver's Abstract, at the employee's expense, from the province in which they are licensed.

The manager is responsible to ensure that all employees complete and sign the "Driver Abstract Consent Form" or equivalent form for another jurisdiction, and that form is to be kept on file.

### **Driver's Abstract Requirements**

Abstracts are to be obtained and evaluated prior to vehicle assignment and driving.

At time of sign on, new employees or previous employees who have not been working in the previous 90 days will provide abstracts dated within fifteen days of their hire date at their own cost.

It is the responsibility of the hiring manager to ensure that all of these conditions are met. Abstracts are to be kept in the operating area and a copy sent to Paragon Ventilation Ltd.

### **Driver Orientation and Training**

In addition to the orientation and safety training identified in this manual, all drivers will receive job specific training and orientation applicable to the type and size of commercial vehicles operated. Each training program includes truck operational training, a written operational test, a post training road test, and a general knowledge review. This training may be repeated for drivers who do not achieve a "satisfactory" performance rating on their annual review. Each job specific training program includes training in the applicable "Safety Laws" and includes training in the following items:

- Operational training specific to the type of vehicle operated.
- Training on the proper completion of all paperwork including pre and post trip inspections, timesheets and shipping documents.
- Training on weights and dimensions, loading and unloading procedures, and load securement.
- Transportation of Dangerous Goods as required.

### **Driver Evaluation**

Drivers are divided into three categories, based on the demerit systems in place within the various provincial jurisdictions. Based on the results of the annual driver abstract reviews, all drivers are classified as low risk, medium risk, or high risk drivers. Remedial action for each risk category is identified in the following table and it is the responsibility of the driver's supervisor or manager to ensure that the remedial action is initiated once notified by the safety department.

Risk Class	Classification Criteria	Risk Mitigation and Management Strategies
Low	<ul style="list-style-type: none"> <li>Demerits &lt;6</li> </ul>	<ul style="list-style-type: none"> <li>No restrictions on driving</li> <li>Abstracts reviewed annually</li> <li>Defensive Driving recommended every three years.</li> </ul>
Medium	<ul style="list-style-type: none"> <li>Demerits 7 – 10</li> <li>Driving Experience &lt;3 years</li> <li>Two Photo Enforcement tickets in two years</li> <li>One preventable vehicle incident in 24 months</li> </ul>	<ul style="list-style-type: none"> <li>No restrictions on driving</li> <li>Abstract review every 6 months</li> <li>Defensive Driving Mandatory</li> <li>Documentation to employee file</li> <li>Sign-off by Regional Manager</li> </ul>
High	<ul style="list-style-type: none"> <li>Demerits &gt;11</li> <li>Conviction for Impaired Driving in previous three years</li> <li>Conviction for Refusal to Provide Breath Sample in previous three years</li> <li>Administrative Suspension within previous two years</li> <li>Four photo Enforcement tickets in two years</li> <li>Two preventable vehicle incidents in 24 month period</li> </ul>	<ul style="list-style-type: none"> <li>Loss of take home privileges for vehicles owned, leased or operated by Paragon Ventilation</li> <li>Abstract review every 6 months</li> <li>Mandatory Defensive Driving</li> <li>Mandatory Driver Evaluation</li> <li>VP notification of Driver's Status</li> <li>Documentation to employee file</li> <li>Sign-off by Divisional VP</li> </ul>

*\*Photo Enforcement Tickets apply to identified drivers issued violations while operating vehicles owned, leased or rented by Paragon Ventilation and does not apply to personal vehicles.*

## Vehicle Use

All vehicles and equipment will be operated in accordance with applicable Federal Regulations, Provincial Acts and Bylaws, Municipal Regulations and Transportation of Dangerous Goods Regulations.

Only authorized persons are permitted to ride in light vehicles owned, leased or operated by Paragon Ventilation Ltd.

## Driver Responsibilities

All drivers are expected to drive defensively, lawfully, under control and in compliance with all applicable Acts, Regulations, Bylaws and policies.

- The driver is responsible to ensure that all required documentation, including registration, insurance, inspection and weight information, is in the vehicle.
- If a driver or operator receives any document (i.e., ticket, warning, inspection) while operating, or in control of, a company vehicle, the driver must immediately report and give a copy of the document to their manager. Managers will complete an Incident Report for each document received following the normal Incident Reporting process.
- Employees are responsible for all fines for violations occurring while a vehicle is under their control. This includes any fines issued as a result of photo-enforced speed or signal violations for a vehicle owned, leased or operated by Paragon Ventilation Ltd assigned to an employee. It is the responsibility of the assigned driver to ensure that the vehicle is operated in a safe manner.

- All drivers must have the appropriate and valid driver's license. The license must be current with an up-to-date address and must satisfy all requirements to operate the respective vehicle. Additionally, all drivers must comply with operator's license codes and conditions when driving company vehicles (i.e., drivers who require corrective lenses in order to meet the minimum visual requirements must always wear corrective lenses while driving).
- Drivers must refuse to operate any equipment they have not been trained to operate until they have received adequate training from a qualified operator.
- No employee will drive or operate equipment if they are fatigued, in a highly agitated state, confused, ill or their abilities to operate a motor vehicle are impaired by any drug or medication.
- Drivers are not permitted to exceed either 13 hrs of driving time or 15 hrs away from Paragon Ventilation Ltd primary location and therefore are exempt from log book requirements.
- Seat belts must be worn at all times while operating vehicles owned & operated by Paragon Ventilation Ltd and powered mobile equipment which is equipped with Roll-Over Protection Structures (ROPS).
- The maximum speed limit for all light vehicles owned, leased or operated by Paragon Ventilation Ltd is the posted speed limit, or less, depending on road conditions. Every driver is responsible for matching vehicle speed to prevailing road conditions. Speed is to be adjusted downward for adverse traffic, weather or road conditions.
- The speed limit for gravel roads is 80 kilometers per hour unless otherwise posted.
- When meeting vehicles on gravel roads, vehicles shall slow to 60kph or less.
- Cruise control shall not be utilized on slippery or icy road conditions.
- When driving a vehicle, maintain your focus on the task. If you need to reach for food or other objects, stop when safe to do so and then perform the non-driving tasks.
- When traveling on private roads. All vehicles owned, leased or operated by Paragon Ventilation Ltd must comply with posted speed limits and traffic controls.
- The use of radar detecting devices is not permitted in company vehicles.
- All employees must observe the necessary safety precautions when refueling vehicles:
  - Do not smoke while refueling
  - Do not dispense gasoline while motor is running
  - Never leave pump unattended
  - Do not use cell phone while refueling
  - Report any reportable spills to the necessary authorities
- All loads must be properly secured using tie down assemblies appropriate for the size and type of load.
- Warning devices such as emergency flashers and reflective triangles must be used whenever it becomes necessary to park a vehicle on the side of the road. The following rules apply:
  - Always turn on your emergency flashers
  - Immediately place reflectors or reflective triangles at a minimum of 30 meters in front and behind the vehicle during daylight hours
  - Immediately place reflectors or reflective triangles at a minimum of 75 meters in front and behind the vehicle at night or when visibility is limited

- If your emergency flashers are inoperative, place reflectors or reflective triangles at a minimum of 75 meters in front and behind the vehicle regardless of whether it is day or night
- All equipment defects must be documented and reported at once and corrected prior to any further use.
- Headlights are to be used at all times when driving.
- It is the responsibility of all Paragon Ventilation Ltd employees (including any passengers) and supervisory staff to not permit personnel to drive or operate equipment if they are fatigued, in a highly agitated state, confused, ill or their ability to operate a motor vehicle is impaired by any drug or medication.
- Firearms are not permitted in vehicles owned, leased or operated by Paragon Ventilation Ltd
- All new cellular phones for use in vehicles owned, leased or operated by Paragon Ventilation Ltd. must be purchased with hands-free operating capacity. If a vehicle is not equipped with a hands-free cellular phone, the driver must stop and park the vehicle when the phone is in use.
- All occupants in vehicles owned, leased or operated by Paragon Ventilation Ltd must wear seat belts. The number of seat belts dictates the number of occupants in a vehicle.
- No employees or others are permitted to ride in the cargo bed of a pick-up, the deck of a moving truck or trailer, fenders and platforms of equipment, or the bucket of an excavator or loader.

### **Vehicle Inspection**

Vehicle Inspections are among the best tools available to identify hazards and assess the risks associated with the operation of a vehicle prior to incidents and losses occurring. All vehicles must be thoroughly inspected prior to use and every 24 hours while in operation. Any significant deficiencies must be corrected prior to vehicle use.

Inspections are to be recorded on a daily vehicle inspection form.

## **Appendix A – Bill of Lading**

### **Bill of Lading and General Hauling**

When goods are shipped a bill of lading for those goods shall be prepared by:

1. The consignor of the goods,
2. The carrier transporting the goods, or
3. The operator of the depot, if the goods are being shipped through the facilities of a depot.

A bill of lading shall be identified by a numerical code or other means of identification and shall set out at least the following:

- Name and mailing address of the consignor
- Date of the consignment
- Point of origin of the shipment
- Name of the originating carrier
- Names of connecting carriers (if any)
- Name and mailing address of the consignee
- Destination of the shipment
- Particulars of the goods comprising the shipment, including weight and description
- A space to indicate: The signature of the consignor or his agent
  - The declared value of the shipment
  - The amount to be collected
  - Whether the charges are prepaid or collect
  - Whether the C.O.D. fee is prepaid or collect, by the carrier on a C.O.D. shipment
  - Any special agreement between the consignor and the carrier
- A provision stipulating whether the goods are received in apparent good order and condition
- Where charges are to be prepaid or collected
- A statement in conspicuous form indicating that the carrier's liability is limited by a term or condition of the applicable schedule of rates or by other agreement, if such a limitation exists.

A bill of lading does not meet the requirements unless it is:

1. Fully completed, and
2. Signed by the consignor and the carrier.

The person who is the originating carrier of goods being shipped shall on the bill of lading issued for those goods:

- Acknowledge receipt of the goods by signing the bill of lading, and
- Indicate in the space provided whether the goods when taken into his custody were in apparent good order and condition, or if not, give the details of any defect.

## Manifest

A manifest is another transport document that serves as a tally-sheet, and gives a detailed summary of all the bills of lading issued by a carrier (or its agent) for a particular route of a particular vehicle. For cargo carrying vehicles, a manifest lists information its:

- Consignor
- Consignee
- Number
- Origin
- Destination
- Value
- Other such information needed by customs authorities


## Appendix B – Cargo Securement





Cargo being transported on the highway must remain secured on or within the transporting vehicle. The cargo must remain secured on or in the transporting vehicle under all conditions that could reasonably be expected to occur in normal driving.

If you follow the requirements in the North American Cargo Securement Standard, you will be in compliance with provincial (Canada) and Federal (US) regulations. The intent of this section is the following:


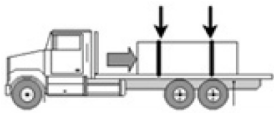

- Apply the securement requirements in the North American Cargo Securement Standard.
- Safely load and secure specific types of commodities.
- Inspect a secured load for compliance with the North American Cargo Securement Standard.




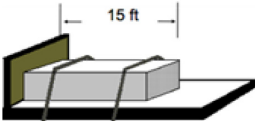

### Cargo Securement

General Provisions	
Driver Inspections Inspect Vehicle & Equipment	<ul style="list-style-type: none"> <li>▪ Tools &amp; Equipment</li> <li>▪ Chains/Straps/Anchor Points/Frame</li> <li>▪ No knots, cracks, cuts, damaged or weakened components.</li> <li>▪ Used for purpose they are intended for.</li> <li>▪ Tarp straps are intended to secure tarps, not cargo.</li> <li>▪ The CVSA “Out of Service” criteria lists the defect values that would exclude a fastening device.</li> </ul>
Synthetic webbing is defective if working portion contains:  	<ul style="list-style-type: none"> <li>▪ Knot(s), more than 25 percent of stitches separated, broken/damaged hardware, any repair or splice, overt damage, severe abrasion</li> <li>▪ Straps cannot be cut, repaired, tied in knots</li> <li>▪ Cuts are counted cumulatively across width along length</li> <li>▪ A 1/2” cut on the left side adds to a 1/2” cut on the right side - even if on other end of strap</li> <li>▪ Max 3/4” for 4” Strap</li> <li>▪ Max 5/8” for 3” Strap</li> <li>▪ Max 3/8” for 1 3/4” or 2” Straps</li> </ul>
General Criteria	Notes
Cargo must be secured so that it does not: <ul style="list-style-type: none"> <li>▪ Leak, spill, blow off, fall from or through vehicle, or shift making vehicle unstable or affecting its maneuverability</li> </ul>	It can be secured by: <ul style="list-style-type: none"> <li>▪ Ensuring cargo is fully contained.</li> <li>▪ Securing the cargo inside of or on the vehicle.</li> <li>▪ Using blocking and tie downs.</li> </ul>
Cargo must be able to withstand a minimum amount of force applied to it	<ul style="list-style-type: none"> <li>▪ During turning/stopping/acceleration</li> </ul>
G Forces .8g Forward .5g Sideways .5g Rearward .2g Upward	G Force = Gravity = 1g is weight of object 80% of weight of object 50% of weight of object 50% of weight of object 20% of weight of object

G Forces		<ul style="list-style-type: none"> <li>An object in motion wants to stay in motion.</li> <li>.8g forward is stopping from 60mph in 3.5sec.</li> <li>Cargo does not have to be additionally secured if the cargo is fully contained.</li> </ul>
		
Securing Cargo		Notes
Using Vehicle Structure		<p>Can use cargo stakes or other vehicle structure for some articles:</p> <ul style="list-style-type: none"> <li>You could haul some car tires in here.</li> <li>It would not work well for sand.</li> <li>It would not be adequate for heavy objects that could roll around.</li> </ul>
Blocking & Bracing		
	<p>We can use “dunnage” or other cargo to block the cargo from shifting..</p> <p>We can use “Friction Mats”.</p>	<ul style="list-style-type: none"> <li>Use timbers to take up the gap.</li> <li>Nail a brace or block to the floor.</li> <li>Ensure cargo is tight against the rest of the cargo. Do not leave gaps.</li> <li>Specifically designed mats to place cargo on</li> <li>High friction - keeps cargo from sliding.</li> <li>Usually used for rolls of paper or drums inside of a van.</li> </ul>
		<ul style="list-style-type: none"> <li>Some cargo inside a van is fully contained.</li> <li>Not everything is secure just because we cannot see it.</li> <li>A van with one loose pillow in it is OK.</li> <li>A van with a Dangerous Goods barrels rolling around is not OK.</li> </ul>
How do we know if it is secure enough?		<ul style="list-style-type: none"> <li>We use enough methods or devices to ensure it does not move.</li> <li>If cargo has moved or devices have come loose, our system has failed.</li> <li>We can use calculations to determine if we have used enough securement devices.</li> </ul>
We can calculate the strength of our “Securement Devices”		<ul style="list-style-type: none"> <li>If we apply enough “Securement Devices” to the load, we increase the amount of energy it will take to move the cargo.</li> <li>If we pull back on the cargo, it keeps it from moving ahead.</li> <li>If we pull to one side on the cargo, it keeps it from moving to the other side.</li> <li>If we pull ahead on the cargo, it keeps it from moving back.</li> </ul>
Applying Down-force		<ul style="list-style-type: none"> <li>If we pull down on the cargo, it increases the amount of friction between the load and the deck and keeps it from sliding.</li> <li>If the deck or the cargo is slippery, we may need to apply other devices including chains, boomers, hooks, straps, ratchets, anchor points.</li> </ul>



		
Default Value	<ul style="list-style-type: none"> <li>If there are no readable markings, the rating defaults to a minimum value.</li> </ul>	
Damage	<ul style="list-style-type: none"> <li>If any part of the securement device is damaged, it may not be counted.</li> <li>The CVSA “Out of Service” criteria lists the defect values that would exclude a fastening device.</li> </ul>	
Devices	Note	
Securement devices have to be able to be tightened	<ul style="list-style-type: none"> <li>Driver must be able to adjust or re-tighten tie down devices.</li> <li>Securement devices must be secured against coming undone.</li> </ul>	
	<ul style="list-style-type: none"> <li>Boomers wired shut</li> </ul>	<ul style="list-style-type: none"> <li>Other methods acceptable.</li> </ul>
No Default Value	<ul style="list-style-type: none"> <li>If there are no readable markings on a tie down device (chain, boomer, strap), the tie down is not counted as having a Working Load Limit (WLL) and the securement device would not be counted when considering if the load was secured properly.</li> <li>A WLL identification is required on all chains, straps, binders/boomers, etc.</li> </ul>	
Aggregated Working Load Limit (AWLL)	Notes	
Sum of all WLL of all devices used to secure an item of cargo	<ul style="list-style-type: none"> <li>Add up the WLL of all the tie down and securement devices.</li> <li>Approved Friction Mats may be used in the calculation. 50% .5g</li> <li>50% for each anchor point. If chain is hooked on 2 ends that is 100%</li> </ul>	
Aggregate WLL for blocking device	<ul style="list-style-type: none"> <li>If you are only using tie downs to hold against forward movement, you need to secure load using an AWLL of 80% of the weight of the cargo. .8g</li> <li>You would still have to secure against movement in all other directions</li> </ul>	
Minimum AWLL	 <p>The minimum aggregate working load limit for an item of cargo is equal to 50% of the weight of the cargo</p>	
Minimum # of tie downs depending on length	 <ul style="list-style-type: none"> <li>An article that is less than 1.52m and (5') weighs less than 500 kgs (1100 lbs.) requires 1 tie down device.</li> </ul>	

<p>An article that is more than 1.52m (5') and weighs less than 500 kgs (1100 lbs.) requires 2 tie down devices.</p>	
<p>An article that is more than 3.04 m (10 ft.) and is not secured against forward movement needs 2 tie downs for the first 3.04 m (10 ft.) of length and 1 additional tie down for each additional 3.04 m (10 ft.) of length or portion of.</p>	
<p>If an article is secured against forward movement by a header or other secured cargo, only one tie down is needed for up to 3.04 m (10 ft.) even if it is over 500 k</p>	
	<ul style="list-style-type: none"> <li>▪ If an article is secured against forward movement by a header or other secured cargo, one tie down is needed for each 3.04 m (10 ft.) or portion of.</li> </ul>
	

### Cargo Securement General Provisions Chart

CARRIER	DRIVER
<ul style="list-style-type: none"> <li>▪ Will not allow a driver to operate a vehicle where the cargo transported in or on the vehicle is not contained, immobilized or secured in accordance with this standard.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Will not operate a vehicle where the cargo transported in or on the vehicle is not contained, immobilized or secured in accordance with this standard.</li> </ul>
<ul style="list-style-type: none"> <li>▪ Ensure that the driver understands and complies with this standard.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Inspect the vehicle to confirm the cargo will not interfere with the driver's ability to drive the vehicle safely.</li> </ul>
	<ul style="list-style-type: none"> <li>▪ Ensure the cargo does not interfere with the ability to freely exit the cab.</li> </ul>
	<ul style="list-style-type: none"> <li>▪ Inspect the cargo before driving the vehicle and within the first 80 kms of loading, and every 240 kms or 3 hours whichever comes first, during the trip as well as every time the driver changes duty status.</li> </ul>