



GAZZOLA PAVING LIMITED

Procurement and Contractor Management Policy Statement

Gazzola Paving Limited is committed to the selection of Health and Safety minded subcontractors and service providers. Bases on our belief in the Internal Responsibility System and that all workplace parties must work together and do their part in achieving a healthy and a safe workplace, Gazzola Paving Limited will develop Health and Safety criteria to help select, monitor and evaluate subcontractors and service providers. Meeting the criteria should give an indication on the subcontractor's ability and competency to assess and control Health and Safety hazards resulting from work done by the subcontractor or by our Company. Meeting the criteria will also play a role in the continuity of business with the subcontractor or service provider.

Gazzola Paving Limited will maintain open communication channels with all workplace parties including subcontractors and service providers, especially when there is a change that will affect the Health and Safety of the work.

Gazzola Paving Limited, when working as the General Contractor on a project, maintains the right to lead the co-ordination of all Health and Safety requirements on all employers. Gazzola Paving Limited will enforce the Health & Safety measures and procedures prescribed by the Occupational Health and Safety Act (OHSA) and all applicable regulations to ensure the Health and Safety of all workers on the project is protected as listed under the Constructor duties in the Occupational Health and Safety Act (OHSA).


Virgil Gazzola, Vice-President

March 5, 2024
Date

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PURPOSE

The purpose of the Contractor/Subcontractor Procedure is to set a minimum standard for all those that work under Gazzola Paving Limited ("Gazzola") in a contract or subcontract capacity. This procedure is to ensure that all contractors/subcontractors follow the OSHA requirements and Gazzola's Health & Safety Program requirements.

SCOPE

- Pertaining to the health, safety, and environment portion of each entity, service provider or subcontractor working directly for Gazzola.
- Pertaining to the health, safety, and environment portion of each entity, service provider or subcontractor working under any other entity or subcontractor working for Gazzola.

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Ensuring subcontractors are following Gazzola Health & Safety Program.
- Ensuring service providers and subcontractors have provided all appropriate Health & Safety documentation.
- Assist in the service provider and sub-contractor review procedure as required.

Senior Management Responsibilities:

- Reviewing the service provider and subcontractor performance review completed by the project manager and the site superintendent.

Project Manager Responsibilities:

- Determining which subcontractors are to perform work on projects.
- Advising the Health & Safety Coordinator and Site Superintendent of the subcontractor information and contract details.
- Completing the subcontractor review form with input from the Site Superintendent and the Health & Safety Coordinator.
- Ensure communication of the requirements under this procedure is scheduled with all site level personnel including workers, service providers and subcontractors.
- Requesting service providers and subcontractor documents to ensure all service providers and Subcontractors can demonstrate competency and implement the site-specific workplace requirements.
- Review workplace specific requirements under the forms required on this procedure

Superintendent Responsibilities:

- Conducting Site Orientations and updating service providers and subcontractors on Gazzola Policies and Procedures.
- Ensuring submittal of subcontractor's daily/weekly paperwork, such as hazard assessments, site inspections, toolbox talks, etc.
- Conducting inspections of sites, documenting findings and sharing relevant information with Gazzola senior management.

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- Review findings with each Foreman to ensure that corrective measures are taken.
- Follow-up on the findings and implement recommendations for each unsafe condition.

Foreman Responsibilities:

- Ensure, where reasonably possible, that every service providers and subcontractor, worker and visitor at the workplace complies with all Occupational Health and Safety Act and Regulations.
- Conducting inspections of sites, documenting findings and sharing relevant information with Gazzola Superintendent
- Review findings with the superintendent and implement the corrective measures required.

Workers Responsibilities:

- Working in conjunction with service providers and subcontractor employees.
- Ensuring subcontractors are following Gazzola Health & Safety Program.

Subcontractors Responsibilities:

- Ensure compliance to all applicable H&S regulatory requirements and relevant procedural requirements outlined within the Gazzola H&S manual.
- Conduct Toolbox Talks or an equivalent sub-contractor's safety meeting with their employees at least once a week. A copy of the toolbox talk to be forwarded to the Site superintendent on a weekly basis.
- Inspect all equipment and work site conditions prior to beginning work. All tools and equipment shall be maintained in safe operating condition.
- Ensure that Locates have been obtained for all underground utilities and are maintained on regular basis.
- Ensure that all necessary PPE/ clothing for employees is provided and used appropriately.
- Report any injuries requiring medical attention to the Site Superintendent and required regulatory agencies.
- Undertake an investigation of all incidents and near misses and forward a copy of all related reports to the Gazzola within 24 hours.
- Attend and participate, in mandatory weekly H&S meetings as determined by Gazzola.
- Ensure compliance with instructions regarding corrective actions issued by Gazzola.
- Ensure that employees attend orientation training prior to beginning work.
- Subcontractor are responsible for advising all their employees of the requirements outlined within this procedure.

Service Provider Responsibilities:

- Ensure compliance to all applicable H&S regulatory requirements and relevant procedural requirements outlined within the Gazzola H&S manual.
- Inspect all equipment and work site conditions prior to beginning work on a Gazzola project. All tools and equipment shall be maintained in safe operating condition.
- Ensure that all necessary PPE/ clothing for employees is provided and used appropriately.
- Report any injuries requiring medical attention to the Site Superintendent and required regulatory agencies.

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- Undertake an investigation of all incidents and near misses and forward a copy of all related reports to the Gazzola within 24 hours.
- Attend and participate, H&S meetings, when necessary, as requested by the Superintendent.
- Ensure compliance with instructions regarding corrective actions issued by Gazzola Paving.
- Ensure that employees know Gazzola's H&S requirements while on site.
- Service providers are responsible for advising all their employees of the requirements outlined within this procedure.

PROCEDURE

Gazzola has developed specific criteria for selecting, monitoring and evaluating its sub-contractors and service providers. The mentioned criteria along with the provided forms will be used to ensure that Gazzola's work is sub-contracted in a fair and a consistent manner to Health and Safety minded Sub-contractors that can prove the ability and the competency in:

- Assessing and controlling hazards resulting from their work that may impact the Health and Safety of any worker on site.
- Assessing and controlling hazards resulting from other Gazzola's work that may impact the Health and Safety of their workers

To comply with the above requirements, subcontractors and service providers on Gazzola's jobsites are required to demonstrate the ability to perform their own hazard assessments, providing the process is deemed to be meeting or exceeding Gazzola's hazard assessment process requirements during all phases of the subcontractor's work on a project (Selection, Monitoring & Evaluation).

Subcontractors and service providers lacking the capacity or resources to implement an acceptable hazard assessment process due to size or any other restrictions, will be required to follow Gazzola's hazard assessment process as conducted by Gazzola's supervisor on site in accordance with Section 2 (Hazard Assessment, Analysis & Control) & Section 3 (Controls) of this H&S Program.

In addition to that, Gazzola will include all services provided or tasks performed by sub-contractors into its own hazard assessment process including the identification of appropriate control measures.

Contractor/Subcontractor Management:

Selection:

1. Gazzola Project Manager to determine which and when subcontractor will be working on a project site.
2. Gazzola Project Manager to communicate subcontractor details to Health and Safety Coordinator and Site Superintendent.
3. Gazzola Project Manager to provide direct Subcontractor with a copy of the Gazzola Health & Safety Program (or applicable/relevant portions).

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4. Gazzola Senior Management or Project Manager to provide subcontractors with a complete subcontract agreement outlining the scope of work, timelines, milestones and payment details.
5. Gazzola Senior Management or Project Manager to provide subcontractor with a copy of this procedure.
6. Subcontractor to provide all documentation prior to beginning work:
 - Subcontractor Health and Safety Agreement (Form 4-1)
 - Fully signed contract
 - Hazard acknowledgement letter (Form 4-2)
 - Subcontractor Adherence to Contractors Health and Safety Program (Form 4-3)
 - Form 1000
 - WSIB clearance certificate
 - Liability insurance certificate
 - Competent Supervisor Form (Form 4-4)
 - SDS Sheets and Proof of Worker(s) WHIMIS training
 - Additional Training Certificates as Required by all legislative acts and regulations relevant to the scope of their work (ex. Work at Height)
 - Copy of Subcontractor's Health & Safety Policy
 - Copy of Subcontractor's Workplace Violence & Harassment Policy
 - Pre-Start JHA (Refer to Form 2-1-1)
 - Underground Utility Locates
7. Subcontractor to complete transfer of Gazzola Health & Safety Program details and required documentation to any party under they employ and direction, whether directly or via a subcontract.
8. Subcontractor to ensure that all persons under their direction or employ, whether directly or via subcontract, shall be fully aware and remain compliant with this policy and all appropriate transfer of policy and expectation is completed.

Contractor/Subcontractor Monitoring:

1. Gazzola Health and Safety Coordinators and Site Superintendents/Foremen shall inspect and monitor the ongoing activities of the subcontractor.
2. Subcontractor to always complete necessary modifications when noted to remain compliant to all policies and legal requirements.
3. Gazzola Health and Safety Coordinators to note any subcontractor violations relative to health, safety, and environmental and bring to the attention of Gazzola Paving Ltd. senior management. This includes direct and indirect subcontractors. Non-compliant entities will be warned of the infraction and held accountable as required. This will be accomplished using various methods, including, but not limited to, progressive corrective actions or contract removal.

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4. Gazzola senior management, in conjunction with the Project Manager to review the subcontractor upon completion of the work.

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Contractor/Subcontractor Review Procedure

1. Project Manager to complete the subcontractor review form. (4-5)
2. Advise Senior Management of any issues that were identified during the review process.
3. Keep a record of the review in the job file.
4. Arrange a meeting with the subcontractor to discuss any performance issues if planning on using the subcontractor again.
 - a. Make minutes of the meeting and distribute to Senior Management, Project Manager(s), Subcontractor.

Service Provider Management:

Service providers will be managed on a case-by-case basis, based on their involvement in Gazzola's Projects and/or Head Office including the length and frequency of their involvement, the size of the service provider and the type of work performed.

Service providers may be managed on an annual basis in accordance with the description above and not by project.

Selection:

1. Gazzola Project Manager to determine which and when service provider will be working on a project site.
2. Gazzola Project Manager to communicate service provider details to Health and Safety Coordinator and Site Superintendent.
3. Gazzola Project Manager may provide service provider with a copy of the Gazzola Health & Safety Program where applicable (or applicable/relevant portions).
4. Gazzola Senior Management or Project Manager to provide service provider with a copy of this procedure.
5. Service provider to provide all documentation prior to beginning work:
 - Hazard acknowledgement letter (Form 4-2)
 - Service provider Adherence to Contractors Health and Safety Program (Form 4-3)
 - Form 1000 (Where applicable)
 - WSIB clearance certificate (Where applicable)
 - Liability insurance certificate (When necessary)
 - SDS Sheets and Proof of Worker(s) WHIMS training (If applicable)
 - Additional Training Certificates as Required by all legislative acts and regulations relevant to the scope of their work (ex. Work at Height)
 - Copy of service provider's Health & Safety Policy when necessary

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6. Service provider to complete transfer of Gazzola Health & Safety Program details and required documentation to any party under their employ and direction, whether directly or via a subcontract.
7. Service provider to ensure that all persons under their direction or employ, whether directly or via subcontract, shall be fully aware and remain compliant with this policy and all appropriate transfer of policy and expectation is completed.

Service Provider Monitoring:

1. Gazzola Health and Safety Coordinators and Site Superintendents/Foremen shall inspect and monitor the ongoing activities of the service provider.
2. Service provider to always complete necessary modifications when noted to remain compliant to all policies and legal requirements.
3. Gazzola Health and Safety Coordinators to note any service provider violations relative to health, safety, and environmental and bring to the attention of Gazzola Paving Ltd. senior management. This includes direct and indirect service providers. Non-compliant entities will be warned of the infraction and held accountable as required. This will be accomplished using various methods, including, but not limited to, progressive corrective actions or contract removal.
4. Gazzola senior management, in conjunction with the Project Manager to review the service provider upon completion of the work.

Service Provider Review Procedure

1. Project Manager to complete the service provider review form. (4-5)
2. Advise Senior Management of any issues that were identified during the review process.
3. Keep a record of the review in the service provider's file.
4. Arrange a meeting with the service provider to discuss any performance issues if planning on using the service provider again.
 - a. Make minutes of the meeting and distribute to Senior Management, Project Manager(s), service provider.

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Sub-Contractor Document Submissions

Gazzola Subcontractor Health & Safety Job Start Up Mandatory Submissions

- Subcontractor Health and Safety Agreement (Form 4-1)
- Fully signed contract
- Hazard acknowledgement letter (Form 4-2)
- Subcontractor Adherence to Contractors Health and Safety Program (Form 4-3)
- Form 1000
- WSIB clearance certificate
- Liability insurance certificate
- Competent Supervisor Form (Form 4-4)
- SDS Sheets and Proof of Worker(s)WHIMS training
- Additional Training Certificates as Required by all legislative acts and regulations relevant to the scope of their work (Ex. Work at Height)
- Copy of Subcontractor's Health & Safety Policy
- Copy of Subcontractor's Workplace Violence & Harassment Policy
- Pre-Start JHA (Refer to Form 2-1-1)
- Underground Utility Locates

Gazzola Subcontractor Health & Safety Daily and Weekly Submission Requirements

* Subcontractor can submit their own forms provided Gazzola deems them to be sufficient. This means of equal or greater standard than the forms provided herein by Gazzola. *

Daily

1. Daily Job Hazard Assessment (Gazz card or equivalent)
2. Pre-Dig Utility Checklist/Locates (Form 4-6)
3. Traffic Protection Plan

Weekly

1. Weekly Site Inspection
2. Record of Toolbox Talk

Communication & Coordination:

Gazzola will maintain open communication channels with all workplace parties including subcontractors and service providers, especially when there is a change that will affect the Health and Safety of the work. Changes affecting workplace hazards and controls will be communicated immediately to affected subcontractors and service providers and all other interested parties through e-mail communication, site meetings/tailgate talks, and memos. Communication will be documented, and records will be kept by Gazzola's Project Management.

Gazzola, when working as the General Contractor on a project, maintains the right to lead the coordination of all Health and Safety requirements for all subcontractors.

Gazzola will enforce the Health & Safety measures and procedures prescribed by the Occupational Health and Safety Act (OHSA) and all applicable regulations to ensure the Health

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and Safety of all workers on the project is protected as listed under the Constructor duties in the Occupational Health and Safety Act (OHSA).

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DISTRIBUTION

The **Project Manager** will ensure distribution of this documentation when requested and gathering of all pertinent information during the procurement process.

The **Project Manager** and **Superintendent** will also be responsible for the distribution and gathering pertinent information to/from the Subcontractors during the Site Orientation. The **Health and Safety Coordinator** and **Superintendent** will also be responsible for the distribution and gathering pertinent information to/from the Service Providers prior to project start up.

RECORDS

All information gathered during the subcontractors/service providers management process shall remain on file for a period of at least five years.

4-1 Form – Subcontractor Health & Safety Agreement

Company: _____

Date: _____

Project/Contract #: _____

Gazzola Paving Limited reminds their sub-contractors that they are required to work in a safe manner, and to comply with all applicable requirements of the Ontario Occupational Health and Safety Act regulations and other applicable codes and standards and in particular, the Construction Project Regulation.

This checklist is to be completed by the sub-contractor and reviewed at the pre-construction meeting by the Construction Project Manager and/or Health and Safety Management. Contractors are reminded to bring their completed checklist form with them to the pre-construction meeting.

1. NOTICES

Gazzola Paving Ltd. must be notified in writing when the Ministry of Labour has been contacted. Have you read and understood the sections for filing notices and completing registrations?

- | | Yes | No |
|---|--------------------------|--------------------------|
| • When a critical injury or death occurs at a workplace | <input type="checkbox"/> | <input type="checkbox"/> |
| • Where an accident, explosion or fire causes injury at a workplace | <input type="checkbox"/> | <input type="checkbox"/> |
| • Accident and/or explosion | <input type="checkbox"/> | <input type="checkbox"/> |

2. CONTRACTORS SITE SAFETY DOCUMENTATION

- | | Yes | No |
|--|--------------------------|--------------------------|
| • Health and Safety Policy | <input type="checkbox"/> | <input type="checkbox"/> |
| • Copy of Occupational Health and Safety Act | <input type="checkbox"/> | <input type="checkbox"/> |
| • WSIB Poster (In case of Injury) | <input type="checkbox"/> | <input type="checkbox"/> |
| • MSDS/SDS Sheets | <input type="checkbox"/> | <input type="checkbox"/> |
| • Ministry of Labour Inspection Reports Posted (If Applicable) | <input type="checkbox"/> | <input type="checkbox"/> |
| • Registration of Contractors and Employers (Form 1000) | <input type="checkbox"/> | <input type="checkbox"/> |
| • Traffic Control Plan | <input type="checkbox"/> | <input type="checkbox"/> |
| • Name of Health and Safety Representative | <input type="checkbox"/> | <input type="checkbox"/> |
| • Name of persons trained in First Aid | <input type="checkbox"/> | <input type="checkbox"/> |

3. HEALTH AND SAFETY REPRESENTATIVE

Joint Health and Safety Committee (required when there are more than 20 workers on the project and the project is to last more than 3 months or when ordered by the Ministry of Labour)

- Health and Safety Representative (required where the number of workers regularly exceed 5 or when ordered by the Ministry of Labour)

Name: _____

Contact Info: _____

4-1 Form – Subcontractor Health & Safety Agreement

4. PERSONAL PROTECTIVE EQUIPMENT AVAILABLE

	Yes	No	N/A
• Hard Hats/Safety Footwear/Reflective Safety Clothing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Safety Glasses	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Hearing Protection	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Respiratory Protective Equipment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Confined Space Entry Equipment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Fall Protection	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Other _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

5. CONTRACTOR STAFF TRAINING CONFIRMATION

	Yes	No	N/A
• WHMIS Training	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Orientation Training	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Traffic Control Training	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Confined Space Entry Training	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Equipment Training for Operators	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Equipment Operator Signaller Training	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Trenching/Excavation Training	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Working at Heights Training	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Use and Care of PPE	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Asbestos Awareness Training	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Fit testing of respirator	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Ontario Reg 297/13 – Occ. Health and Safety Awareness	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Other _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Copies of Certificates submitted: Yes No N/A

6. TRAFFIC CONTROL MEASURES

	Yes	No
• Traffic Control Plan to be provided on the field as per the MTO Traffic Control Manual for Roadway Work Operations	<input type="checkbox"/>	<input type="checkbox"/>

7. SUPERVISION

Name of Competent Supervisor: _____

Contact #: _____
CELL BUSINESS

8. EMERGENCY

Accident Prevention, Reporting & Procedure	Yes	No	N/A
• Is an Emergency Plan in Place?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Are First Aid Kits available onsite?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Are qualified First Aider's onsite?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Emergency telephone number	() _____		
• Police Non-Emergency number	() _____		

4-1 Form – Subcontractor Health & Safety Agreement

9. CONFINED SPACES

- | | Yes | No | N/A |
|---|--------------------------|--------------------------|--------------------------|
| • Does the sub-contractor have testing equipment and procedures capable of evaluating hazards within a confined space before entry? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| • Is the sub-contractor familiar with the confined space requirements outlined in the Occupational Health & Safety Act and Regulations? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

10. EXCAVATIONS/TRENCHING

- | | Yes | No | N/A |
|---|--------------------------|--------------------------|--------------------------|
| • The sub-contractor understands that it is their responsibility to arrange for underground utility locates | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Type of support system proposed: | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| • Timbering and Shoring | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| • Pre-fabricated support system | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| • Trench Box (liner) certified | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| • Sloping as per soil type | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| • Hydraulic support system | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| • Sheathing | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

List and discuss any additional potentially hazardous conditions or operations that are typically associated with the project (if required):

Gazzola Paving Limited Project
Manager: _____

Sub-Contractor Representative: _____

(I declare that I have answered all required questions in the application fully and truthfully)

Company: _____

Position: _____

Contact: _____