



GAZZOLA PAVING LIMITED

Legislation and Other Requirements Policy Statement

Gazzola Paving Limited will identify all legislative requirements applicable to the scope of work including the Occupational Health and Safety Act and all applicable legislations, regulations, standards and guidelines.

It will be the responsibility of Gazzola Paving Limited to maintain compliance with all applicable legislative and other requirements and ensuring that all documentation related to the legislative and other requirements is up to date.

Gazzola Paving Limited will ensure the availability of relevant legislations and all other posting requirements in all work locations visibly posted for all employees.

To that purpose, Gazzola Paving Limited will ensure that a system is established to document, maintain and keep records on all Health and Safety information required by the Company's Health and Safety Management System and internal policies and procedures.

Gazzola Paving Limited will regularly evaluate compliance with all legislative and other requirements that are applicable to the scope of work. The goal of the evaluation is to identify gaps and opportunities for improved compliance.

A handwritten signature in blue ink that reads "Virgil Gazzola".

Virgil Gazzola, Vice-President

March 5, 2024

Date



GAZZOLA PAVING LIMITED

Workplace Harassment Prevention Policy Statement

Workplace Harassment

Workplace Harassment is defined to mean “engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome or sexual harassment”. The following examples as cited from the Canadian Human Rights Commission are to be considered different forms of harassment. It can include comments or actions related to race, national or ethnic origin, colour, religion, age, sex, marital status, family status, disability, pardoned conviction, or sexual orientation.

Sexual Harassment

Sexual Harassment is defined in the Occupational Health and Safety Act as engaging in a course of vexatious comment or conduct against a worker in a workplace because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome. In addition, making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

A reasonable action taken by an employer or supervisor relating to the management and direction of its workplace is not considered Workplace Harassment.

Gazzola Paving Limited recognizes the right of workers to work environment free of workplace harassment. Gazzola Paving Limited is committed to a workplace that values people and is free from Workplace Harassment. Every employee, contractor, and/or visitor in our workplace will be treated fairly and with respect. It is the responsibility of senior management, managers, supervisors, workers, contractors and visitors to ensure that a harassment free workplace is fostered and maintained.

Successful implementation of this policy will be ensured through effective planning, application, open communications and monitoring of procedures regarding the prevention of Workplace Harassment. All workplace parties will receive training regarding standards of workplace behaviour, their roles and obligations, and procedures for dealing with their concerns and issues.

Any potential situation of harassment that can affect the workplace or another worker shall be immediately reported to their supervisor or directly to Senior Management. All of these incidents shall be investigated and where appropriate measures will be taken.

Retaliation against persons who bring a complaint of harassment is strictly prohibited and will be dealt with accordingly.

A complaint of Workplace Harassment that is intentionally fraudulent, frivolous or malicious may be subject to disciplinary action.



Virgil Gazzola, Vice-President

March 5, 2024

Date



GAZZOLA PAVING LIMITED

Workplace Violence Prevention Policy Statement

For the purpose of this Policy, the term Workplace Violence as defined in the Occupational Health and Safety Act is as follows:

Workplace Violence

- (a) the exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker;
- (b) an attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to a worker;
- (c) a statement or behaviour that is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker.

Gazzola Paving Limited recognizes the right of workers to work environment free of workplace violence. Gazzola Paving Limited strives to provide all employees, suppliers, contractors and visitors with an environment free of Workplace Violence. Mutual respect must be the basis of interaction, cooperation and understanding among all staff and/or contractors. Gazzola Paving Limited will not tolerate or condone behaviour that is likely to threaten the health and safety of any of our workers or contractors. This policy applies to all business operations and personnel as well as social events that are organized by or on behalf of the company.


Acts of Workplace Violence can take the form of either physical contact or threat of physical contact. They may occur as a single incident or may involve a continuing series of incidents. Abuse in any form destroys worker confidence and lowers workplace morale. This in turn reduces productivity and can impact quality of life.

Any potential situation of violence that can affect the workplace or another worker shall be immediately reported to their supervisor or directly to Senior Management. All of these incidents shall be investigated and based on the findings appropriate measures will be taken, including disciplinary action and contacting of local authorities.

Successful implementation of this policy will be ensured through effective planning, application, open communications and monitoring of procedures regarding the prevention of Workplace Violence. All workplace parties will receive training regarding standards of workplace behaviour, their roles and obligations, and procedures for dealing with their concerns and issues.

Retaliation against persons who bring a complaint of actual or perceived violence is strictly prohibited and will be dealt with accordingly.

A complaint of Workplace Violence that is intentionally fraudulent, frivolous or malicious may be subject to disciplinary action.


Virgil Gazzola, Vice President

March 5, 2024

Date



GAZZOLA PAVING LIMITED Return to Work Policy Statement

The focus of Gazzola Paving Limited is to implement an effective Return to Work Program (RTW) that will ensure the well-being of our most valuable resource, our workers. This RTW program is a temporary measure (in some extreme cases - permanent) that will facilitate a safe and early return to work in the event of a disabling workplace accident and provide every opportunity for injured workers to return to gainful employment.

The primary goal of a RTW plan is a return to the pre-injury job as soon as possible. By comparing the physical demands of the job and the functional abilities, the RTW coordinator, supervisor and the employee can determine if the job needs modifying and if accommodations would be required.

The RTW Program will facilitate a safe and early return to work for workers who have sustained a workplace injury while employed with our company while providing every opportunity for injured workers to return to gainful employment in the event of a disabling workplace accident.

Once an injured worker has been placed on an RTW program, the supervisor for that worker along with the Return to Work coordinator will be expected to follow the program with the injured worker and keep Management updated as required.

This Program can only be successful if there is commitment, cooperation and communication between the employer and workers and as necessary the treating physician, health care providers and the Workplace Safety and Insurance Board (WSIB).

Assigning ownership in any RTW Program is vital in achieving desired results. As such, identifying and understanding each party's role and responsibility is the first key.

The RTW Program Coordinator will ensure regular communication exists between Worker, Supervisor and the Health Care Provider.

The Injured Worker will return all completed documentation provided from the health care provider, follow the functional abilities recommendations from the completed third page of the Form 8 and any modified duties provided by the company.

The Health Care Provider will provide medical treatment to an injured worker while adequately completing the Form 8 during the initial visit and provide the completed third page of the Form 8 to the worker. This third page represents the functional abilities information found during the assessment. Every subsequent visit, the physician will complete a functional Abilities Form provided by the injury party.

The WSIB will monitor the progress of the workers return to work and provide assistance if either the employer or the workers have any difficulty or dispute concerning either parties' cooperation with the RTW. Either party could contact the WSIB for assistance. This includes the assistance of a WSIB assigned Return to Work Mediator who will assist both workplace parties in resolving any or all disputes that need to be addressed.

The success of our RTW program is essential to provide every opportunity for injured workers to return to gainful employment and will provide us with the opportunity to accommodate an injured worker and facilitate the goal of returning a worker to his or her pre-injury duties as soon as possible.



Virgil Gazzola, Vice-President

March 5, 2024

Date

Section 13-1 - Legislation and Other Requirements

PURPOSE

To identify and ensure compliance with the most current versions of all legislative, regulations, standards and other requirements that apply to the scope of operations by Gazzola Paving Limited.

SCOPE

The procedure covers all legislations, regulations, standards, guidelines or any other requirement that may be applicable to the scope of operations of Gazzola Paving Limited.

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Identify all legislations, regulations and other requirements applicable to the scope of operations.
- Monitor compliance and ensure all Health and Safety documentation are up to date with the most current version of all legislations, regulations and other requirements applicable to the scope of work.
- Advise Senior Management of any changes to the legislations and other requirements and determine the corrective action needed to remain within compliance.
- Conduct an annual evaluation of compliance with all legislations, regulations, standards and any other requirements that apply to the scope of operations.
- Ensure Health & Safety Posting Boards are maintained with appropriate postings in all work locations that are clearly visible.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Assist in developing corporate health and safety orientation documentation, policies and procedures where required.
- Distribute and communicate information to the appropriate parties

Senior Management Responsibilities:

- Ensure the applicable legislations, regulations and other requirements to the scope of operations are identified
- Ensure the Company remains within compliance with the most current and up to date versions of all applicable legislations, regulations, standards and other requirements.
- Review and approve any changes needed to remain in compliance with the most current and up to date versions of all applicable legislations, regulations, standards and other requirements.
- Ensure all company employees receive the appropriate regarding any impacting changes in the Legislations and other requirements.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Ensure that the equipment, materials and protective devices are provided, maintained in good condition and used as prescribed.
- The measures and procedures prescribed are carried out in the workplace;

Section 13-1 - Legislation and Other Requirements

Superintendent Responsibilities:

- Ensure the Health & Safety Posting Board on his/her project is complete with all appropriate postings that are clearly visible.
- Ensure Project compliance with all legislative and other requirements through Site Inspections and correction of any non-compliance identified
- Communicate with all workers any impacting changes in the Legislations and other requirements as required.
- Ensure, where reasonably possible, that every Subcontractor, worker and visitor at the workplace complies with all applicable legislations, regulations and any other requirements including The Occupational Health and Safety Act and Construction Regulations.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Foreman Responsibilities:

- Ensure the Health & Safety Posting Board on his/her project is complete with all appropriate postings that are clearly visible.
- Assist the Site Superintendent in Inspections and correction of any non-compliance identified to ensure site compliance with the legislations and all other requirements.
- Ensure, where reasonably possible, that every Subcontractor, worker and visitor at the workplace complies with all applicable legislations, regulations and any other requirements including The Occupational Health and Safety Act and Construction Regulations.
- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Workers Responsibilities:

- Follow and remain in compliance with all applicable legislations, regulations and any other requirements including The Occupational Health and Safety Act and Construction Regulations.
- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
- Report to his or her Foreman any contravention of the Occupational Health and Safety Act and Regulations or the absence/defect in any equipment or protective device.\

PROCEDURE

Gazzola Paving Limited has identified the following legislations and regulations to be applicable to the scope of Operations:

Ontario Health and Safety Regulations

- The Occupational Health and Safety Act R.S.O. 1990
- Ontario Regulation 213/91 – Construction Projects
- Ontario Regulation 851 – Industrial Establishments
- Ontario Regulations 297/13 – Health and Safety Awareness Training
- Ontario Regulation 420/21 – Notices and reports under sections 51 to 53.1 of the Act

Section 13-1 - Legislation and Other Requirements

- Ontario Regulations 490/09 – Designated Substance
- Ontario Regulation 164/99. - Ontario Electrical Safety Code, (Electrical Safety Authority)
- Ontario Regulation 572/99 – Training requirements for certain skill sets and trades
- Ontario Regulation 860 –WHMIS Workplace Hazardous
- Ontario Regulation 278/05 – Asbestos
- Ontario Regulations 833 -Biological or Chemical Agents, Control of Exposure
- Ontario Regulation 632/05 –Confined Space Regulation
- Ontario Regulation 381/15 - Noise
- Ontario Regulation 1101 (WSIB) – First Aid Requirements
- WSIA – Workplace Safety and Insurance Act
- Smoke Free Ontario Act
- WSIB Regulation 035/08 – Return to work

Technical Safety and Standards

- Technical Safety and Standards Act 2000 – TSSA
- Canadian Standards Association - CSA
- Ontario Regulation 211/01 – Propane Storage and Handling
- Ontario Regulation 213/01 – Fuel Oil

Employment Standards

- Ministry of Labour Employment Standards Act 2000

Environmental

- Environmental Protection Act R.S.O. 1990
- Ontario Regulation 347 – General Waste Management
- Ontario Regulation 360 – Spills
- Ontario Regulation 361/98 – Motor Vehicles
- Canadian Environmental Protection Act
- Ontario Water Resources Act
- Dangerous Goods Transportation Act R.S.O. 1990
- Nuclear Safety and Control Act
- Canadian Net-Zero Emissions Accountability Act

Note: There may also be any additional Municipal or Regional regulations that are applicable to Gazzola Paving Ltd. and information should be sought in each jurisdiction prior to beginning a project.

The Health and Safety Coordinator will be responsible for monitoring any updates to the applicable legislations and regulations applicable the scope of operations using the government websites and publications to ensure compliance with all applicable legislations, regulations and other requirements.

The Health and Safety Coordinator will advise Senior Management of any changes to the Legislations and Regulations that may affect the operations of Gazzola Paving Limited. Assessment of the changes and subsequent actions must be taken to ensure all documentation related to legislation, regulations, standards and any other requirements are in compliance and up to date

Section 13-1 - Legislation and Other Requirements

Posted Health & Safety Material

The following postings must be visibly posted on the Health and Safety Posting Boards in all work locations where Gazzola Paving Limited is performing work:

- Health & Safety Policy
- Workplace Violence and Harassment Policy
- JHSC/H&S Representative names and work locations
- Emergency Contact Numbers
- Emergency Procedure/ Plan
- OH&S Act and Regulations for Construction Projects
- OH&S Act and WHMIS Regulations
- Regulation 1101
- Form 82 - In Case of Injury
- Health and Safety at Work - Prevention Starts Here Poster
- Form 1000
- Map to Nearest Hospital
- First Aid Certified Employees Names and Certificates
- Location of eye wash station
- MOL Orders if any
- Active Work Permits if any
- Other Health & safety related information

Evaluation of Compliance

Evaluation of compliance with all legislations, regulations and other requirements will be done annually after related material has been gathered. The evaluation, in the form of a gap analysis will identify future or immediate changes required or training needs to remain within regulatory compliance. Records of the evaluations of legislative compliance will be kept on the Annual Report.

RECORDS

Records of the evaluations of compliance with the Legislation and other requirements will be recorded and kept as part of the Annual Report..

COMMUNICATION

All information concerning changes to the Legislation and other requirements will be communicated by management and the Joint Health and Safety Committee/Health and Safety Representative on a regular basis. Management and the Joint Health and Safety Committee/Health and Safety Representative will regularly monitor each health and safety bulletin board to ensure all health and safety information is posted and updated.

Section 13-2 - Workplace Violence and Harassment

PURPOSE

The Workplace Violence and Harassment Prevention Policies and Programs have been developed to communicate the accepted corporate health and safety principles. It establishes the right of workers to a workplace free of violence and harassment and requires employers to take positive action to prevent any form of these issues in the workplace.

SCOPE

The Workplace Violence and Harassment Prevention Policies are to be regarded by all workplace parties as directives for compliance with the Health and Safety Manual.

RESPONSIBILITIES

Health and Safety Coordinator Responsibilities:

- Develop a corporate violence and harassment policy statement.
- Ensure all company employees receive the appropriate training and workplace specific Safe Work Practices regarding Violence and Harassment prevention.
- Review, update and provide the corporate violence and harassment policy statement to Senior Management annually.
- Distribute and post corporate violence and harassment policy statement.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- Assist in developing corporate violence and harassment training documentation, policies and procedures where required.
- Distribute and communicate information to the appropriate parties regarding any nonconformance or deficiencies reported.

Senior Management Responsibilities:

- Endorse the corporate violence and harassment policy statements.
- Comply with all the requirements as defined under the Occupational Health and Safety Act and Regulations.
- The measures and procedures prescribed are carried out in the workplace;

Project Manager Responsibilities:

- Enforce the violence and harassment policy statement, programs and corporate expectations.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Section 13-2 - Workplace Violence and Harassment

Superintendent Responsibilities:

- Conduct a workplace violence assessment as it relates to all workplace locations and the head office.
- Assist in conducting incident investigations where reports of workplace Violence and or Harassment have been identified.
- Review findings with each required Foreman to ensure identified and correct each unsafe condition.
- Assist in the follow-up on the findings and correction of each unsafe condition.
- Ensure equipment, materials and protective devices are provided, maintained and used as required at site and office locations.
- Provide required protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.

Foreman Responsibilities:

- Ensure the violence and harassment policy statement, practices, procedures and corporate expectations are met.
- Assist in conducting incident investigations where reports of workplace Violence and or Harassment have been identified.
- Ensure, where reasonably possible, that every Subcontractor, worker and visitor at the workplace complies with all Occupational Health and Safety Act and Regulations.
- Advise a worker of the existence of any potential or actual danger to the health or safety of the worker of which they are aware of,
- Take every precaution reasonable in the circumstances for the protection of a worker.
- Where so prescribed, provide a worker with written instructions as to the measures and procedures to be taken for the protection of the worker.

Workers Responsibilities:

- Mutual respect must be the basis of interaction, co-operation and understanding among all workplace parties
- Advise the Foreman if experiencing any difficulties with assigned tasks, or if assigned tasks are beyond perceived limitations or medically not capable of performing tasks.
- Works in the manner and with the protective devices, measures and procedures required by the Occupational Health and Safety Act and Regulations.
- Report to his or her Foreman any contravention of the Occupational Health and Safety Act and Regulations or the absence/defect in any equipment or protective device.

PROCEDURE

Required programs, policies or procedures associated with the prevention of workplace violence and/or harassment have been developed and reviewed to ensure compliance with the Occupational Health and Safety Act and Applicable Regulations.

Specific Corporate Workplace Violence and Harassment Prevention Policies. An annual review will be conducted to each policy and is to be signed and dated by **Senior Management**, distributed by the **Health and Safety Coordinator** and implemented by all **Superintendent** and each **Foreman**.

Section 13-2 - Workplace Violence and Harassment

Workplace Violence Assessments will be conducted using **(13-2-1-1 Form)** for developed for all appropriate locations by the **Health and Safety Coordinator**. On the construction sites by the **Superintendent** or competent designate as part of the Pre-Job Construction Activities & Violence Risk Assessment Form. A annual review of these assessments will be conducted to ensure all programs, polices compliance procedures and training is appropriate and maintained.

The **Superintendent** and/or **Foreman** will conduct a Workplace Investigation to determine contributing factors, root cause and follow up actions required where situations of potential Workplace Violence and/or Harassment have been reported.

Failure to comply may result in progressive discipline up to and including termination with cause, If Progressive Discipline is deemed necessary, the **Superintendent** or **Senior Management** will ensure that the appropriate people are assembled and the documentation is recorded. All related documents must be forwarded to the **Health and Safety Coordinator** immediately for review and filing.

DISTRIBUTION

Distribution of the Workplace Violence and Harassment Prevention Programs, Policies will be as follows:

1. Reviewed with new employees during the Orientation Process
2. Posted on all Health and Safety Boards and other locations deemed appropriate

RECORDS

All documentation and records associated with workplace violence and harassment prevention will be maintained on file indefinitely.