



# COMPANY POLICY



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The information has been posted with the intent that it be readily available for non-commercial (educational) use.

Under this, we ask that:

- The materials not be modified
- Users exercise due diligence in ensuring the accuracy of the materials
- MGI Construction Corporation be identified as the source of the materials

### *Notice*

MGI Construction Corporation makes every effort to ensure that employees, subcontractors, clients, and are kept up-to-date on the annual amendments made to this policy. In doing so, we go to great length to ensure the accuracy of the information posted. However, it must be noted that there may be instances where information is not as current as it can possibly be.

### **MGI Construction Corporation 2024**

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## Company Policy

*How We're Constructing History*



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## Policy Statement

MGI Construction Corporation's team benefits from multiple and overlapping generations of experience in the construction contracting industry. Our in-house administration, engineering, and safety staff accommodate all required procedures and methodologies as per government regulations and policies where our skilled trades and qualified management tackle the project hands-on.

Align with high-standards and operating procedures, we are pleased to report we have successfully completed many projects in the building and development industry to date and maintain a growing fleet consisted of pieces of heavy equipment, trucks, and attachments.

At the forefront of our business is our commitment to health and safety. This has and will continue to be an integral part of the delivery of all our projects. Our comprehensive health and safety program is mandatory for all staff to complete and observe. We closely monitor all aspects of our projects and constantly survey for potential hazards and risks—it is of utmost importance that all health and safety policies are adhered to for the duration of every project.

Our commitment to promoting a mutually beneficial environment extends beyond our immediate circle and considers it within a global context. We believe environmental sustainability is more than a buzzword and put forth a sharp focus on these concerns all the while recognizing the accelerating pace of economic growth and the importance of sound infrastructure to complement it. Against this backdrop, we follow environmentally responsible practices under MOECC and MOL guidelines. In addition, we've worked on LEED projects and can assist with your certification process.

Our services are fully insured and bonded; including both liability insurance and WSIB. Our four divisions integrate to offer full-service packages that track development projects start-to-finish:

*Environmental:* Asbestos Removal (Type 1, 2, and 3); In-situ and Ex-situ Remediation, Soil Stabilization and Reengineering, Brownfield Site Management, Underground Tank and Ancillary Piping Removal.

*Demolition:* Concrete Recycling, Aggregate Crushing and Screening – Complete Interior/Exterior Demolition and Abatement, Asset and Salvage Recovery.

*Earthworks:* Bulk, Strip, Muck, Footing, Trench, and Topsoil Excavation – Ditching, Backfill, Grading, Hauling and Shoring Services.

*Heavy Civil:* Sewer (Storm and Sanitary Connection/Installation), Watermain, and Roadworks – Including Asphalt, Curb and Gutter, Sidewalk.

Our field team is composed of a dynamic mix of certified technicians, experienced operators, skilled labour, and project managers.

MGI Construction Corporation is contractor recommended. We work closely with general contractors, government agencies, private developers, as well as the industrial/commercial sector and are built upon a stellar reputation within the industry. We adhere to a hands-on policy towards all our projects, whether large or small.

## Mission

Leveraging multiple and overlapping generations of field experience, MGI is solemnly dedicated to providing our clients with cost-effective and timely service; our employees with a safe and rewarding workplace; and our planet with environmentally sound business strategies and operating procedures.

## Vision

To cultivate, develop, and restate the land we share and the communities built upon it.

## Careers

Some seek employment where others are driven by a greater civic-duty.

MGI Construction Corporation is a private multifaceted construction organization that employs a bold complement of on-site staff including project managers and coordinators, heavy equipment operators, a diverse set of skilled trade members and craft labour as well as an ace support team consisting of estimators, HSE managers, and administration and development officers.

The spirit of our team extends beyond transactional employment and embraces those who wish to contribute to a continually growing organization that acknowledges the force of the industry and the grit of its community in constructing history. We have a continuing admiration for our many team members who work tirelessly to accomplish these ends and operate with an embedded sense of personal responsibility, courage, and commitment towards organizational achievement.

The idea of candidates seeking an employer that promotes a sense of inclusion and engagement while aiming to contribute to a greater purpose is nothing new, yet we feel as if the past several decades have provided a less than optimal environment for those who wish to bring their talents to a remarkably rewarding and impactful industry. Our objective is to provide a clearer voice to these discussions and spark a renewed interest in these matters. In fact, our entire management philosophy and business strategy revolve around it.

We do not pretend that the success of our organization has been the result of any one event, action, or individual but rather the result of the persistent and deep-rooted character of each member of our team—day in and day out. Simply stated.

## Code of Conduct

Our code of conduct outlines our expectations regarding employees' behaviour towards their colleagues, supervisors and the overall organization. It applies to all employees of MGI Construction Corp. regardless of employment conditions or rank.

We promote freedom of expression and open communication, yet we expect all employees to follow our code of conduct. They should avoid offending, participating in serious disputes, and disrupting our workplace. We also expect them to foster a well-organized, respectful, and collaborative environment both on- and off-site.

### *1. Compliance with the Law*

All employees must protect our company's legality—municipally, provincially, and federally. In Canada, the law applies to everyone, including the police, the government and public officials.

Law can be divided into public and private law. Public laws set the rules for the relationship between a person and society and the roles of different levels of government. This includes criminal law, Constitutional law, and administrative law. Employment at MGI Construction Corp. implies that you are subject to the law, as you would with any other organization, and will be held fully responsible for compliance within it.

Canadian laws recognize and protect basic rights and freedoms, such as liberty and equality. Employees must comply with all environmental, safety, and fair dealing laws. We expect employees to be ethical and responsible when dealing with our company's finances, products, partnerships and public image.

### *2. Respect in the Workplace*

All employees should respect their colleagues. MGI Construction Corp. will not allow any kind of discriminatory behaviour, harassment or victimization. Employees should conform with our equal opportunity employer policy and workplace violence and harassment policy in all aspects of their work, from recruitment and performance evaluation to interpersonal relations.

### *3. Protection of Company Property*

All employees should treat our company's property, whether material or intangible, with respect and care.

Employees should not misuse company equipment or use it frivolously. They must respect all kinds of incorporeal property (this includes trademarks, copyright and other property such as information, or reports). Employees should use company property only to complete their job duties.

Employees should protect company facilities and other material property (e.g. company vehicles) from damage and vandalism, whenever possible. Damage or misuse of company property should be reported and handled within the progressive discipline policy where appropriate.

#### 4. *Professionalism*

- *Dress Code and Personal Appearance:* all employees must follow our dress code as it pertains to occupational health and safety. Within reason, self-assessments must be made as to what grooming, attire, or other aspects of personal appearance (e.g., facial hair, tattoos) may violate our workplace violence and harassment policy.
- *Corruption:* we discourage employees from accepting gifts or similar from clients or partners. We prohibit bribery for the benefit of any external or internal party.
- *Job Duties and Authority:* all employees should fulfill their job duties with integrity and respect toward customers, stakeholders, the community, and the environment. Supervisors and management must not abuse their authority. We expect them to delegate duties to their team members while taking into account their competences and workload. Likewise, we expect team members to follow team leaders' instructions and complete their duties with skill and in a timely manner. We encourage mentoring throughout our corporate structure with the purpose of collaboration and career progression.
- *Absenteeism and Tardiness:* employees should follow their schedules as provided by supervisors or management. MGI Construction Corp. can make exceptions for occasions that prevent employees from following standard working hours or days but in general, we have an expectation that employees will be punctual when coming to and leaving from work.
- *Conflict of Interest:* we expect employees to avoid any personal, financial, or other interests that might hinder their capability or willingness to perform their job duties. Other aspects of this and the accountability of such matters are outlined in the employee confidentiality agreement.
- *Behaviour:* employees should be friendly and collaborative. They should try not to disrupt the workplace or present obstacles to their colleagues' work. All employees must be open to communication with their colleagues, supervisors, or team members.

- *Benefits and Perks:* we expect employees to not abuse their employment benefits or company perks. This can refer to time off, insurance, fuel for vehicles or equipment, personal protective equipment items, facilities, subscriptions, electronics, or other benefits our company offers currently.

## Policies

All employees should read and follow our company policies. If they have any questions, they should ask their supervisor, management, trainer, or administrative staff. Feedback and commentary are welcomed. For direct contact, inquiries should be addressed to “MGI Construction Corporation Administrator” by e-mail at [admin@mgicorp.ca](mailto:admin@mgicorp.ca) or by phone at 416-675-2280.





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January 29, 2024



Company Policy  
*Legislation*



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## Objective

To ensure that all required materials regarding health, safety, and the environment (HSE) are posted in conspicuous locations at MGI Construction Corp.

## Scope

This applies to all MGI Construction employees.

## Requirements

The following information items are to be made available on MGI sites:

Item	Supplier	Updated	Supporting Legislation
Health and Safety Policy Statement	MGI - Senior Management	Annually	Occupational Health and Safety Act - Ontario Sec. 25. (2)(k)
Workplace Violence and Harassment Policy Statement	MGI - Senior Management	Annually	Occupational Health and Safety Act - Ontario Sec. 32.0.1 (1)(2)
“Employment Standards in Ontario”	The Ministry of Labour (MOL)	As changes occur	Employment Standards Act, 2000 (ESA)
Occupational Health and Safety Act and Regulations - Ontario	Government of Ontario	As changes occur	Occupational Health and Safety Act - Ontario Sec. 25. (2)(i)
First Aid Requirements Regulation (Reg.1101) - Ontario	Workplace Safety and Insurance Board (WSIB) - Ontario	As changes occur	First Aid Requirements Regulation - Ontario
Form 82 - In case of Injury	Workplace Safety and Insurance Board (WSIB) - Ontario	As changes occur	First Aid Requirements Regulation - Ontario (Reg.1101) Sec.3
Certifications of First Aid Attendants	Senior Management	As changes occur	N/A
“Health & Safety at Work:	The Ministry of Labour	As changes occur	Occupational Health and Safety Act - Ontario Sec. 25. (2)(i)

Prevention Starts Here”			
JHSC Members/H&S Rep	MGI - Senior Management	As changes occur	Occupational Health and Safety Act - Ontario, Sec. 8
Inspection Reports	MGI - H&S Representative	Monthly	OHSA Sec. 9
Emergency Services and Numbers	MGI - Senior Management	As changes occur	N/A
Emergency Response Plan	MGI - Senior Management	Yearly	N/A

## Review

To ensure compliance, management will make sure required documents are available and accessible by employees, safety boards are completed for each job site and that health and safety training is arranged for all new employees. Additional job specific training will also be arranged as needed.

To evaluate compliance with legislation, scheduled reviews of employee conformity to company policies, procedures and standards are reviewed by management. The reviews occur annually. This includes employee compliance with required documentation, inspections, work procedures, and incident reports/near misses.

Regularly scheduled reviews, as listed above, are to ensure that the health and safety program is up to date. In addition, when changes to legislature or manufacturing guidelines occur, the company will review policies, procedures, and standards to ensure they are reflective of the current requirements. Documentation will be updated as well.

## Communication

Employees affected by the changes will be informed directly, via electronic devices or during toolbox talks. Additional training will be provided if needed. Legislative requirements will be posted on the safety board at each site.

## Responsibilities

### *Management*

- Provide necessary information to protect the health and safety of the worker.
- Communicate the up-to-date information to workers.

### *Supervisor*

- Ensure the posters are up-to-date.
- Communicate the up-to-date information to workers.

### References

Duties of employers – Occupational Health and Safety Act, s. 25, 26  
Duties of constructors – Occupational Health and Safety Act, s. 23  
Duties of supervisors – Occupational Health and Safety Act, s. 27  
Duties of workers – Occupational Health and Safety Act, s. 28  
Occupational Health and Safety Act  
Construction Projects Regulation, O. Reg 213/91  
Industrial Establishment Regulation, O. Reg. 851  
First Aid Regulation, O. Reg 1101  
Workplace Safety and Insurance Act, 1997





Document #COP01010004  
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**Company Policy**  
*Equal Opportunity Employer*



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## Objective

MGI is an Equal Opportunity Employer (EEO) and prohibits any kind of discrimination or harassment at the workplace. At MGI we are committed to treating everyone fairly and avoiding discrimination against anyone either via conscious or unconscious biases.

Our equal opportunity employer policy applies to all employees, job candidates, subcontractors, and visitors.

## Definitions

Being an equal opportunity employer means that we provide the same opportunities for hiring, advancement and benefits to everyone without discriminating due to protected characteristics such as:

- Age
- Sex/ Gender
- Sexual orientation
- Ethnicity/ Nationality
- Religion
- Disability

## Procedure

At MGI, our EEO policy applies to all aspects of employment including, but not limited to:

- Hiring
- Training
- Evaluating performance
- Compensation and benefits
- Termination

To promote equal opportunity, we ensure we follow all EEO laws that apply to our operations at MGI Construction.

We will also take additional actions to promote fairness and diversity as part of our equal employment opportunity policy. We will:

- Modify structures and facilities to accommodate people with disabilities.
- Hire, train and evaluate employees through job-related criteria.
- Train employees on communication and diversity.
- Implement open door practices so employees can report discrimination easily.

## Disciplinary Consequences

If there is discrimination at MGI, the employee(s) responsible will be subject to disciplinary action depending on the severity of their actions. A progressive discipline form will be completed and corrective actions will be carried out.





Document #COP01010002  
January 29, 2024



## Company Policy *Accessibility*



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## Policy Statement

MGI Construction Corp. is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under the Accessibility for Ontarians with Disabilities Act and Ontario's accessibility laws. With this in mind, we are continuously taking steps to improve the overall accessibility of our facility.

## Scope

The Government of Ontario created the Accessibility for Ontarians with Disabilities Act with the goal of a fully accessible province by 2025 for people with disabilities. Ontario Regulation 429/07–Accessibility Standard for Customer Service is the first Accessibility Standard that requires all businesses to be in compliance with by January 1, 2012.

## Definitions

*Accessibility standard:* an accessibility standard made by regulation under section 6.

*Barrier:* anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, or a policy or practice.

*Disability:* this definition encompasses:

- any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical coordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device
- a condition of mental impairment or a developmental disability
- a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language
- a mental disorder
- an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997

## Training

MGI Construction Corp. will provide on-going training to all employees and others who deal with the public and other people who are involved in developing and approval of customer service policies practices and procedures.

Training includes:

- An overview of the requirements under the Act and the Customer Service Standard
- The purposes of the AODA and its requirements
- How to interact and communicate with persons with disabilities who use assistive devices, service animals and/or support persons
- What to do if a person with a particular disability is having difficulty accessing the Company's goods and services.

MGI Construction Corp. will keep records regarding the training provided, including the dates on which training was provided and the individuals who completed the training.

## Procedure

### *1. Employment*

We will notify employees, potential hires and the public that accommodations can be made during recruitment and hiring. We will notify staff that supports are available for those with disabilities. We will put in place a process to develop individual accommodation plans for employees. Where needed, we will also provide customized emergency information to help an employee with a disability during an emergency.

### *2. Communication*

We communicate with people with disabilities in ways that take into account their disability. We train our employees who communicate with clients on how to interact and communicate with people with various types of disabilities.

### *3. Telephone Services*

We are committed to providing fully accessible telephone service to our clients. We train our employees to communicate with clients over the telephone in clear and plain language and to speak clearly and slowly.

### *4. Assistive Devices*

We are committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our services. We will ensure our employees are familiar and trained with various assistive devices that may be used by clients with disabilities while accessing our services.

#### *5. Billing*

We are committed to providing accessible invoices to all of our clients. Invoices will be provided in an alternative format upon request. We will answer any questions clients may have about the content of the invoice in person, by telephone or email.

#### *6. Service Animals and Support Persons*

We are committed to welcoming people with disabilities who are accompanied by a service animal on the parts of our premises that are open to the public and other third parties. We will also ensure that all employees and others dealing with the public are properly trained in how to interact with people with disabilities who are accompanied by a service animal. We are committed to welcoming people with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be allowed to enter MGI Construction Corp. offices, and with restrictions, on-site, with his or her support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on our premises.

#### *7. Notice of Temporary Disruption*

MGI Construction Corp. will provide clients with notice in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

#### *8. Notice of Availability and Format of Documents*

Notification of the availability of documents related to the Accessibility Standard for Customer Service will be posted at the company facility, on the website and/or by any other reasonable method.

#### *9. Feedback Process*

Customer feedback regarding the way MGI Construction Corp. provides services to persons with disabilities may be made by telephone, by writing or via email.

#### *10. General*

MGI Construction Corp. will be mindful of the commitment to respect and promote the dignity and independence of people with disabilities when considering, passing, reviewing or modifying rules or policies affecting the provision of services to members of the community and the public. Rules or policies inconsistent with these commitments will be modified or removed.

## References

- Duties of employers – Occupational Health and Safety Act, s. 25, 26
- Duties of constructors – Occupational Health and Safety Act, s. 23
- Duties of supervisors – Occupational Health and Safety Act, s. 27
- Duties of workers – Occupational Health and Safety Act, s. 28
- Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11





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**Company Policy**  
*Environmental Protection*



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## Objective

The purpose of this section is to provide instruction to all applicable MGI Construction Corp. employees on their duties and responsibilities as they relate to the protection of the environment on projects, operating facilities and administrative offices where MGI Construction Corp. conducts business.

## Scope

This section and the direction provided within applies to all MGI Construction Corp. work locations where there is a potential for harm to the environment and where environmental leadership can be demonstrated and practiced.

### *Environmentally-Sensitive Projects*

All environmentally-sensitive projects (which are deemed as such through client designation or requirements (or through local government legislation) require the development of an Environmental Protection Plan (EPP) which must be included in the project specific safety program (PSSP). The EPP must identify the specific aspects of the environment to be protected and include written job procedures outlining the method to be used to limit any harmful exposures to the environment.

This plan will be developed in conjunction with the Project Manager, Site Superintendent and Health & Safety Manager.

### *Environmental Hazard Assessment*

Before beginning work on a project, an environmental hazard assessment will be performed. Upon completion, if any issues require clarification by federal, provincial or municipal environmental legislation, the appropriate governing authorities will be contacted by the Site Superintendent (or designate) to ensure compliance.

### *Owner/Client Requirements*

Owner/client environmental requirements or concerns must be addressed before beginning work on any project. Environmental requirements will be discussed with the owner/client during the pre-job meeting. Issues requiring action discussed during the pre-job meeting will be addressed and become part of the environmental protection plan to be included in the PSSP.

### *Site-Specific Environmental Protection Plan (EPP)*

Environmentally-sensitive projects will require the development of a site-specific EPP to be included in the PSSP. This plan will be developed by the Site Superintendent or their designate and will address issues noted in the Environmental Hazard Assessment, local government regulations and client-specific requirements.

The site-specific EPP will, at a minimum, address the following issues:

- Identification of all aspects of the environment that may be at risk due to ongoing operations at the site
- Control measures to be instituted to protect the environment from harm
- Issuance of any permits or licenses required
- Shipping, handling and storage of environmentally hazardous products
- Watercourse siltation control procedure(s)
- Spill containment procedure(s)
- Emergency response plan including personnel, equipment and emergency contact numbers

### *Training*

MGI Construction Corp. will provide instruction and training to all employees to ensure they understand:

- The project-specific environmental protection plan.
- Their responsibilities regarding implementation of the plan.
- All environmental protection procedures to be carried out on the project or work location.

### *Management Training*

MGI Construction Corp. Site Supervisors, Management and Safety Personnel must be trained on the following topics:

- Environmental hazard assessment
- Spill containment and response planning
- Spill cleanup and disposal procedures
- Restoration of contaminated areas
- Environmental incident reporting
- Environmental incident investigation

### *Emergency Response Team*

On all environmentally-sensitive projects, the Site Superintendent or their designate will be responsible to ensure the required environmental response equipment is made available and to establish and train an emergency response team to minimize harm to the environment as a result of a spill or release of a substance that may harm the environment. As a minimum, emergency response training will consist of the following:

- Worker evacuation procedure
- Personal protective equipment requirements and use

- Workplace Hazardous Material Information System (WHMIS)
- Spill containment
- Securing the leak source
- Spill cleanup procedures
- Contaminated waste disposal

### *Workers*

All other workers will be notified of their EPP responsibilities during the project safety orientation. The level of instruction required depends upon the level of environmental risk posed by the work. As a minimum, instruction will consist of the following:

- Project-specific environmental rules
- Reporting of spill guidelines
- Emergency response procedures

### *Project Notification Procedures*

Before beginning of work, environmentally-sensitive projects may require formal notification to the government environmental agency(s) with jurisdiction over the project. The Project Manager or similar is responsible to provide formal notification to the appropriate agency as soon as possible following tender award. Where required, a meeting will be held with appropriate MGI Construction Corp., owner/client and local government environmental agency staff.

The agenda of the meeting should include as a minimum:

- Environmental risk concerns
- Presentation and review of the Project Specific Environmental Protection Program (draft copy)

### *Pre-Existing Environmental Damage*

MGI Construction Corp. employees are responsible for immediately reporting any pre-existing environmental harm that is discovered on-site to the Site Superintendent. The Site Superintendent will notify the Health & Safety Manager and owner/client. The client may be required to notify the local government environmental agency.

### *Emergency Response Plan*

If the environmental assessment for a project determines there is a risk of an environmental incident, the Site Superintendent must ensure the plan addresses the following environmental issues:

- Worker evacuation procedures
- Securing the leak source

- Spill containment procedures
- Spill cleanup procedures
- Contaminated waste disposal
- Emergency contact numbers

## Waste Management

MGI Construction Corp. supports the principle of reduce, reuse, recycle in all its operations.

MGI Construction Corp. office administration will ensure a waste recycling program has been implemented whenever possible. It will be the responsibility of each respective office manager (or designate) to ensure a recycling program has been established. Further, each office manager (or designate) will ensure office staff are participating in the recycling program.

The recycling program should collect all paper, cardboard, aluminum and plastic containers, dry cell batteries, and printer and toner cartridges, at a minimum. Other recycling, such as computers and electronics and composting of food scraps will be at the discretion of the office manager and based on the availability of local commercial collection programs.

Various forms of waste are produced in the normal course of construction and maintenance operations. Due to chemical composition, physical and/or biological properties, wastes are generally categorized as hazardous or non-hazardous.

### *Hazardous Waste*

Construction and maintenance operations generate various quantities of hazardous waste. The definition of hazardous waste according to this policy may refer to:

“those wastes that are potentially hazardous to human health and/or the environment due to their nature and quantity and require special handling techniques.”

All waste generated on MGI Construction Corp. projects that can be classified as hazardous must be handled, stored and disposed of per local government regulations. It is the responsibility of the Site Superintendent to ensure compliance with all applicable legislation.

### *Non-Hazardous Waste*

It is the responsibility of the Site Superintendent to ensure a plan to reduce construction waste is developed and implemented on the project, whenever possible or when specifically prescribed by local government requirements. Non-hazardous waste generated during construction, demolition, maintenance or renovation work is to be

recycled through re-use on the project or removed to local recycling facilities, where reasonably available. The definition of non-hazardous waste may refer to:

“any waste not regulated by the Federal Transportation of Goods Regulations or similar government agency.”

## Environmental Practices

### *Air Quality*

MGI Construction Corp. will make all reasonable efforts to reduce the release of air contaminants generated by equipment or project work processes into public or work areas. Examples of processes or equipment that must be reviewed and remedial action taken by the project superintendent may include:

- Nuisance odours generated from sources such as thaw fires or asphalt plants
- Dust generated from traffic on haul roads
- Hazardous particulate generated from concrete finishing and grinding processes
- Excessive exhaust from internal combustion engines

### *Noise*

Wherever possible, the Site Superintendent will be responsible to schedule project operations so that local noise bylaws are not violated. The Project Manager is responsible to research the requirements for local noise bylaws and include the information in the PSSP.

### *Soil Conservation*

When working in areas identified as environmentally sensitive, the project superintendent is responsible to ensure all project personnel are informed of site requirements and guidelines for:

- Rights of way
- Soil disturbances
- Stockpiling
- Low ground pressure tires or tracks
- Project restoration

### *Transfer of Noxious Weeds*

To mitigate any potential for the transfer of noxious weeds or other contaminants between ecological areas, the Site Superintendent is responsible to implement a process for cleaning equipment before its removal from the site. The cleaning process will be developed per client-specified and/or local government environmental requirements.

### *Groundwater*

The Site Superintendent is responsible to implement the processes outlined in this section and the procedures developed in the PSSP and to ensure all hazardous spills are promptly contained and cleaned up to reduce potential harm to groundwater.

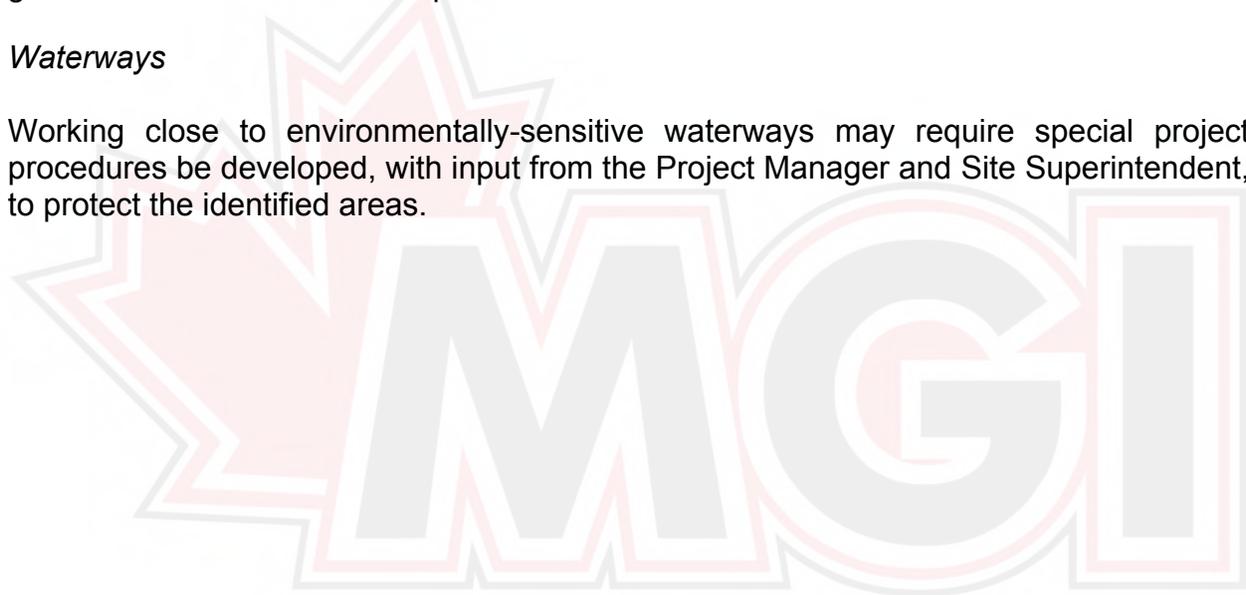
### *Water Discharge from the Project*

The Site Superintendent will institute procedures to prevent turbid water discharges and sediments from escaping the site. The procedures will be designed to minimize erosion and sedimentation from rainfall at the construction site and to identify, reduce, eliminate or prevent the contamination of stormwater.

Before any water is discharged from the site into adjacent waterways or storm sewers, the Site Superintendent will ensure water quality meets the standards of all local government environmental requirements.

### *Waterways*

Working close to environmentally-sensitive waterways may require special project procedures be developed, with input from the Project Manager and Site Superintendent, to protect the identified areas.





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January 29, 2024



**Company Policy**  
*Workplace Violence & Harassment*



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## Policy Statement

MGI Construction Corp. is committed to preventing workplace violence and harassment. This policy defines behaviour that constitutes workplace violence and harassment and explains procedures for reporting and resolving such incidents.

A workplace violence and harassment risk assessment will be conducted before work begins on a site. MGI Construction Corp. will not tolerate any type of violence or harassment within the workplace or during work-related activities under the Occupational Health and Safety Act (OHSA).

## Scope

This policy applies to all employees at MGI Construction Corp. while they are employed at MGI Construction Corp. and while performing work-related activities 'on the clock.'

## Definitions

### *Workplace Violence*

- The exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker.
- An attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to the worker.
- A statement or behaviour that it is reasonable for a worker to interpret as a threat to exercise physical force against a worker, in a workplace, that could cause physical injury to the worker.

### *Workplace Harassment*

- 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.

### *Physical Assault*

Any physical force or threat of physical force to create fear and control against another person (e.g., hitting, blocking, shoving, choking, slapping, biting, or pulling hair, "caring" for the victim in an abusive way, threats of violence, using a weapon or other objects to threaten, hurt or kill).

### *Sexual Assault*

Any unwanted sexual act done by one person to another (e.g., kissing or forcing/coercing the person into kissing, touching the person's body with or without clothes on, causing

bodily harm, taking advantage of a position, trust or authority to get sex, and threatening to harm someone else if the person does not agree to do any of these things).

### *Sexual Harassment*

Sexual harassment is often interpreted as objectionable comments or conduct of a "sexual" nature. However, sexual harassment, in the broader context of unequal treatment based on gender, may refer to instances where the behaviour is not overtly sexual in nature, but is related to the person's gender, and demeans or causes personal humiliation or embarrassment to the recipient (e.g., degrading words, rude jokes or sexual comments, name-calling, sexual demands, and insulting remarks about the person's sexual orientation).

### *Threat (verbal or written)*

- Communicated intent to inflict physical or other harm on any person or to property by some unlawful act.
- A direct threat is a clear and explicit communication distinctly indicating that the potential offender intends to harm (e.g., "I am going to make you pay for what you did to me.")
- A conditional threat involves a condition (e.g., "If you don't leave me alone you will regret it.")
- Veiled threats usually involve body language or behaviours that leave little doubt in the mind of the victim that the perpetrator intends to harm.

### *Verbal, Emotional or Psychological Abuse*

A pattern of behaviour that makes someone feel worthless, flawed, unloved, or endangered. Like other forms of abuse, it is based on power and control (e.g., swearing, put-downs/name-calling over a period of time, labelling the victim in a derogatory way such as stupid, crazy or irrational, acts of humiliation, extreme jealous behaviour, attacking the victim's self-esteem in other ways).

### *Workplace Bullying*

- Repeated and persistent negative acts towards one or more individuals, which involve a perceived power imbalance and create a hostile work environment.

## Reporting and Investigation

Workers are to report all violence-related incidents or hazards to their manager or supervisor. This report can be made confidentially at the employee's request. However, sharing information to ensure the safety of others and prevent recurrence may be necessary (e.g., contents of a police report). The reporting worker may make the report confidential without leaving a copy in the log, indicating the need for confidentiality.

- The manager or supervisor receiving the report investigates it and ensures that measures are taken to safeguard employees and curtail the violence or harassment.
- No report of workplace violence/harassment or risks of violence may be the basis of reprisal against the reporting employee.
- The employer reports all injuries to the MOL and WSIB as required by the OHSA and Workplace Safety and Insurance Act.

## Response Procedures

### 1. *General Response*

- The manager or supervisor documents all reports of workplace violence/harassment, hazards and measures taken to address them.
- If the resolution of the incident is beyond the authority of a manager or supervisor, they must work closely with the President of MGI Construction Corp. The President then involves other managers or supervisors in the investigation as appropriate (e.g., when the incident involves clients or employees under another manager's or supervisor's area of responsibility).
- Management reviews all incident reports, monitors trends, and makes recommendations to the President for prevention and enhancements to this policy.
- These findings are shared with the Joint Health Safety Committee (JHSC), which will then discuss any revisions required to this policy.
- The President then reviews reports of workplace violence/harassment and ensures that actions are taken.
- The managers or supervisors who investigate the reported incident warn all staff who might be affected by dangerous situations. They also tell the reporting employee about the outcome of the investigation to help minimize the chance of similar incidents.
- If a violent incident results in a critical injury to a worker, the JHSC representative or worker-designate investigates the incident or injury Section 9(31) OHSA and reports to the MOL and JHSC.

### 2. *Immediate Threats*

If a violent situation is determined an immediate threat, the emergency response plan for the workplace must be followed.

### 3. *Domestic Violence*

Domestic violence is defined as violent, threatening, or extremely coercive behavior perpetrated by one partner in a current or former relationship on the other. It can consist of a pattern of ongoing abuse, or a single isolated incident.

If senior management becomes aware of domestic violence that would likely expose a worker to physical injury in the workplace, senior management shall take every precaution reasonable in the circumstances for the protection of the worker and other employees. If a supervisor/co-worker discovers that a co-worker is coming to work with bruises or if co-worker is confiding to his/her co-worker regarding domestic violence issues, he/she is to advise him/her to discuss the issue with senior management. All information must be kept confidential to help maintain the privacy of the individual being threatened with domestic violence.

#### *4. Employee with a History of Violence*

Senior management's duty is to provide workers with information, including personal information, related to a risk of workplace violence from a person with a history of violent behavior if:

- the worker can be expected to encounter that person in the course of his or her work
- the risk of workplace violence is likely to expose the worker to physical injury.

No employer or supervisor shall disclose more personal information in the circumstances than is reasonably necessary to protect the worker from physical injury.

#### *5. Violence without Intent*

Violence in the workplace can occur without the intent of the person who is causing harm. Examples of this include:

- A person could become violent due to medical conditions.
- A person could become violent due to the frustration related to their disability.
- Two individuals who are not employees of the company could be fighting and injure an employee who tries to intervene.

If a supervisor becomes aware or ought reasonably to be aware that a worker is taking medication which could potentially cause a violent incident, they must immediately contact senior management to implement safety measures to protect the worker and/or their coworkers.

## Work Refusal

An employee has the right to refuse work if he/she has reason to believe he/she is in danger from workplace violence. However, an employee can only refuse work if the alleged violent offender is at the workplace and has threatened to hurt the other worker. The protocol for the work refusal process can be found in the work refusal procedure.

## Training

New employees will receive both general and site-specific orientations to this policy. In addition, all employees will receive an annual review of the program's general and site-specific components. Any training developed, established and provided will be done in consultation with and in consideration of the recommendations of the JHSC.

## Program Evaluation

The effectiveness of the Workplace Violence & Harassment Policy is evaluated by management and reviewed by the JHSC annually. Workers, managers, and supervisors are accountable for establishing and implementing the policy and procedures related to workplace violence and harassment. Responsibility for complying with the health and safety policy is part of a manager's, supervisor's and worker's job description. Included in the health and safety components of job descriptions are management responsibilities for enforcing policy and procedures, investigating, and responding to workplace violence and harassment.

## Records

All records of reports and investigations of workplace violence and harassment are kept for five years or within a reasonable time period.

## Responsibilities

### *Employer*

- Ensure that measures and procedures in this policy are carried out.
- Hold management accountable for responding to and resolving complaints of violence.
- Make this policy available to workers.
- In consultation with the JHSC, conduct regular risk assessments, establish control measures, and deliver training and education for all employees.
- Integrate safe behaviour into day-to-day operations.
- Develop a reporting process for incidents of workplace violence and harassment.
- Investigate all reports or threats of violence/harassment in a prompt, objective and sensitive way.
- Report incidents of workplace violence to the JHSC within four days if an employee is disabled from performing their work or receives medical attention as a result of an incident.
- Take corrective action(s) and provide response measures.
- Ensure any deaths or critical injuries are reported to a Ministry of Labour (MOL) inspector, the police the JHSC or Health & Safety Representative as required.

- Send the report explaining the circumstances to all parties in writing within 48 hours of the occurrence. Include information and particulars prescribed by the OHSA and regulations.
- Ensure a report goes to WSIB of all accidents where a worker loses time from work, requires healthcare, earns less than regular pay for regular work, requires modified work at less than regular pay or performs modified work at regular pay for more than seven days.
- Ensure violence and harassment statement is reviewed at least annually by senior management.

### *Supervisors*

- Enforce policy and procedures and monitor worker compliance.
- Identify and alert staff to violent persons and hazardous situations.
- Investigate all workplace violence and contact the police as required.
- Facilitate medical attention for employee(s) as required.
- Contact the HSE Manager to ensure the employee receives further counselling about her/his legal rights.
- Track and analyze incidents for trending and prevention initiatives.
- Immediately report a death or critical injury to an MOL inspector, the police, the JHSC or Health and Safety representative as required.
- Report the circumstance to all parties in writing within 48 hours. Include information and particulars prescribed by the regulations.
- Issue a report to the employer and WSIB on all lost-time accidents where a worker requires healthcare, earns less than regular pay for regular work, requires modified work at less than regular pay or performs modified work at regular pay for more than seven days.
- Copies of accident information where there is no critical injury must be provided to the JHSC and the trade union within four days of the occurrence, as prescribed by the OHSA.
- Ensure this policy is reviewed at least once a year.

### *Workers*

- Participate in education and training programs to be able to respond suitably to any incident of workplace violence or harassment.
- Understand and comply with the violence and harassment prevention policies and related procedures.
- Report all incidents or injuries of violence/harassment or threats of violence/harassment to your supervisor immediately.
- Inform the JHSC about your concerns regarding the potential for violence/harassment in the workplace.
- Contribute to this policy.
- Seek support when confronted with violence/harassment or threats of violence.
- Get medical attention if necessary.

- At least once a year, participate in a review of the workplace violence and harassment prevention program.

#### *Investigator*

- Ensure the investigation is kept confidential and identifying information is not disclosed unless necessary to conduct the investigation or as required by law.
- Remind the worker who allegedly experienced workplace harassment, the alleged harasser(s), and any witnesses of any confidentiality requirements.
- The investigator must thoroughly interview both the worker who has allegedly experienced workplace harassment and the alleged harasser(s), if the alleged harasser(s) is a worker. If the alleged harasser is not a worker of the company, the investigator must make reasonable efforts to interview the alleged harasser, if the alleged harasser is known to the company.
- Collect and review any relevant documents.

#### *Alleged Offender*

- Respond to allegations against them.
- Cooperate in the investigation process.
- Review policies and procedures.

#### *Joint Health and Safety Committee*

- Treat workplace violence and harassment incidents the same as any other workplace hazard.
- Participate in the investigation if required.

#### *References*

- Violence and Harassment, Occupational Health and Safety Act, Part III.0.1 s. 32.0.1 – 32.0.8
- Duties of employers – Occupational Health and Safety Act, s. 25, 26
- Duties of supervisors – Occupational Health and Safety Act, s. 27
- Duties of workers – Occupational Health and Safety Act, s. 28
- Health and Safety Representative – Occupational Health and Safety Act, s. 8
- Joint Health and Safety Committee – Occupational Health and Safety Act, s. 9
- The Criminal Code of Canada
- The Ontario Human Rights Code



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## Company Policy *Security*



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## Objective

The purpose of this section is to provide instruction to MGI Construction Corp. employees on their duties and responsibilities to ensure the security of employees, company property, and projects.

## Scope

This procedure applies to all employees at MGI Construction Corp.

## Procedure

Developing a security plan begins in the estimating stages of a project and should address:

- Public access and control
- Worker access
- Tool, equipment and material control
- Security staff
- Electronic security
- Security issues posed by adjacent properties and structures

A security plan will be implemented by the Site Superintendent at the outset of all projects.

### *Public Access and Control*

When planning public access and control, the project location is a significant determining factor. If the project is located in a known high-crime area, a more sophisticated system will be required than if the project is in a residential area where curious children may be the primary problem. Public access and control may include the use of fencing, hoarding, gates, detoured access routes, signage, lighting, visitor registration and security patrol.

### *Fencing and Enclosures (Hoarding)*

The use of fencing and hoarding is intended to prevent public access. The purpose of fencing or hoarding is twofold: to keep unwanted people off the site and to keep materials and equipment inside the site.

Perimeter fencing is a significant aspect of minimizing third-party liability and as such will be provided at all projects unless other over-riding requirements determine otherwise.

In some cases, there are applicable local government regulations that must be complied with. The Site Superintendent is responsible to ensure fencing height and stability complies with all local government requirements.

When signage is placed on perimeter fencing, the Site Superintendent is responsible to ensure any resulting forces due to increased wind loading are taken into account when bracing/anchoring the fence supports.

### *Gates*

- Every project that is fenced or hoarded must have an identifiable main gate.
- Whenever possible, the office should be located at or very near the main gate and display adequate signage to direct people and traffic.
- Secondary access gates should be kept closed when not being used and opened only when required for specific deliveries or other authorized entries.
- All gates must be capable of being locked.

### *Signs*

Highly visible signs must be posted to direct workers, visitors and traffic. Signs to be posted at gate entrances or surrounding the site perimeter may include:

- Site Office
- Visitors Must Sign In
- Designated (e.g., "Construction", "Demolition") Area
- No Trespassing/Do Not Enter
- Personal Protective Equipment Required
- Emergency Meeting Points

### *Visitor Control*

All visitors must report to the project office before accessing the site. On projects without formal security staff, the proper posting of signs will assist supervision in directing and controlling visitors.

Depending on the nature of business and frequency of a person's visits to the site, it may be advisable to include the visitor in the site-specific MGI Construction Corp. orientation. Examples of this type of visitor may be a visiting professional such as an architect or consulting engineer. The Site Superintendent will then determine whether or not the visitor can access the site at later dates without an escort. In such situations, the visitor will be required to check-in at the project office each time before entering the site.

Infrequent or one-time visitors who have not been oriented to the project will be escorted by MGI Construction Corp. personnel or an assigned contractor's representative who has received the MGI Construction Corp. project orientation.

### *After-Hours Site Access*

An important part of the security program is to control the after-hours activity on the project. After-hours is defined as any weekday outside of regular business hours,

statutory holiday or weekend day. It must be made clear to all contractors returning to the job after-hours or on weekends that they must be authorized by the Site Superintendent, who will ensure a responsible MGI Construction Corp. representative is on-site at all times when a contractor is present and working on site.

#### *Security Sign in/Sign out*

Where security staff is contracted or directly employed and stationed on the project, all employees, contractors and their workers and visitors may be required to sign in and out of the project. The Project Manager in consultation with the Site Superintendent will determine if a sign-in/sign out process is required for the security of the site. All personnel must check in with security when returning to the site after-hours.

#### *Lighting*

The Site Superintendent will be responsible to ensure adequate lighting is installed to illuminate areas that allow visual monitoring by security and/or local police from the perimeter fence line. At a minimum, security lighting should be installed to illuminate gates, access and storage areas and site trailers as a deterrent to theft, vandalism or arson.

#### *Vehicle Access to Projects*

On-site parking on projects under construction is not recommended because it may facilitate the theft of tools and material from the project and place the vehicles at risk of damage from the construction processes. When on-site parking is deemed appropriate by the Site Superintendent, a method of control must be established to separate the vehicles from the active working areas.

Only authorized vehicles should be allowed on site. Security staff or MGI Construction Corp. supervision must control vehicle entry. Anyone bringing a vehicle on site must be made aware that it is subject to search when leaving the site.

#### *Tool and Equipment Control*

Each project must have a plan for tool and equipment control. This plan will include a tracking system for tools and equipment owned by MGI Construction Corp. and tools and equipment that are leased or rented.

During the planning stages of the project, the following loss prevention measures must be considered:

- Supervisors are responsible for controlling tools and equipment issued to their crews.
- Tools and equipment should be stored in secure job boxes or tool storage trailers (sea cans) when not in use.

Responsibility for control and record-keeping of tools and equipment may vary according to project size.

Company tools and equipment (including cords, hoses and cables) must be marked and identified.

They can be identified with:

- Factory stencils
- Stamps
- Painted colour bands
- Crimp-on colour bands
- Labels—either adhesive or riveted

Mobile equipment parking must be arranged so the equipment cannot be tampered with or inadvertently started. Ignition keys must not be left in the equipment.

Equipment components that can be dismantled should be stored separately. For example, oxy-acetylene gauges/hoses should be separated from the bottles and cables should be separated from a welding machine.

Fuel and maintenance supplies such as gas, oil, and grease must be stored in an area that reduces the potential for unauthorized use or theft. All flammable products must be stored according to the MSDS, ideally in a separate lockable, ventilated storage shed or container. Orderly tool and equipment storage is also a theft deterrent.

#### *Key Control*

The Site Superintendent is responsible to designate an employee to be responsible for key control on the site. Keys that access general areas of the site must only be issued to MGI Construction Corp. supervisors. An inventory and signature system must be set up to control keys (including vehicle and equipment keys). Spare keys must be locked in a secure container or desk drawer.

When a key is lost, locks should be changed. Keys can be riveted just behind the blade to prevent extra keys from being cut. The use of a master key system is not recommended as it provides minimal security.

#### *Arson and Theft Prevention*

The following guidelines are to be used to reduce the chance of fire and theft in the workplace:

- Where possible, all gates, doors and windows must be properly secured. This will help deter access to other parts of the project should an unauthorized person gain

access to the site. Ensuring doors and windows are closed also assists to contain smoke and fire.

- To deter would-be thieves or vandals from gaining access to a site unobserved, adequate lighting is to be provided in all places deemed appropriate. This will assist police in taking corrective measures and provide increased opportunities for members of the general public to witness and report criminal activities.
- To deter a would-be arsonist an opportunity to start a fire, materials and garbage should be stored away from fence lines.
- When workers on-site believe unauthorized persons are on the worksite, they are required to report the person(s) to their Supervisor.
- Where appropriate, after-hours security staff or electronic surveillance should be provided on the project.

### *Access Codes*

Codes such as lock combinations, door, safe, or other should not be shared by employees to anyone outside of the company or to employees that have not been granted access by management. All restricted access codes will be changed after an employee with this access leaves the company for any reason or has their access removed. Access codes will also be changed if there is a security threat or where there is concern that the access code has been compromised.

### *Electronic Security Systems*

A variety of electronic surveillance systems are available for all sizes of projects. Costs can vary greatly; however, consideration should be given to electronic surveillance systems in high crime areas at the earliest stages of planning.

## **Responsibilities**

### *Supervisors*

- Ensure workers are aware of key aspects of the security plan at the project orientation.
- Develop a security plan before commencing work on the project site.

### *Workers*

- Observe all security rules provided to them at the project orientation.
- Report all suspicious activity they observe to their immediate supervisor.



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Company Policy  
*Substance Use*



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## Objective

The purpose of this policy is to minimize the risk of unsafe and unsatisfactory performance due to substance use (e.g., alcohol or drugs).

## Scope

This policy and its related practices apply to all employees and/or contractors who work on the premises of MGI Construction Corp.

## Policy

MGI Construction Corp. is committed to providing a work environment that is both healthy and safe for all its employees. It is recognized that substance use may have serious negative effects on an employee's mental and physical health, safety and job performance.

To minimize the risk of unsafe and unsatisfactory performance due to substance use, it is expected that all employees are fit for duty when reporting to work and remain so for the duration of the workday. This means that employees must not be impaired by alcohol, legal, illegal, or prescription drugs. If an employee is required to take prescription drugs, these drugs should not inhibit their ability to safely perform their job duties.

Employees and contractors shall not have any alcohol, illegal drugs, impairing drugs, or related substances in their possession while at the workplace. Possession, use, or selling of alcohol, drugs, or other substances is strictly prohibited on the premises of MGI Construction Corp.

Should there be any reason to believe that an employee's job performance is being negatively affected by alcohol, illegal, legal, or prescription drugs, or that this policy is being violated in any way, management of MGI Construction Corp. is entitled to inquire as to the nature of the problem and to take appropriate action.

MGI Construction Corp. practices a 'zero tolerance' policy with regards to substance use while at work.

Supervisors must document their procedure when giving warning in regards to substance use while at work.

Disciplinary measures can consist of any or all of the following:

- Verbal reminders and/or warnings directly to the worker
- Verbal notification to the worker's supervisor and/or employer
- Written notification to the worker and the worker's supervisor and/or employer
- Dismissal of the worker from the site (with notification to their supervisor/employer)

MGI Construction Corp. expects that all workers (employees and contractors) conduct their work safely by following our health and safety policy and program. To convey the importance of working safely, any individual found to be working in contravention of our policy and program shall be subject to disciplinary action.

MGI Construction Corp. will differentiate between behaviour that is properly characterized as an illness or disability and behaviour that is not. Should an illness or disability be present, employees are encouraged to speak to a manager. Management of MGI Construction Corp. will work with the employee in line with the duty to accommodate under the Ontario Human Rights Code.

## Responsibilities

### *Management*

- Assist with any disciplinary actions as required (i.e. suspension or termination)
- Enforce compliance with MGI Construction Corp. rules and legislation

### *Supervisors*

- Oversee and implement the disciplinary procedure
- Document protocol as required
- Ensure the progressive discipline procedure is communicated to each worker as part of orientation before the commencement of work
- Address performance and disciplinary problems in a consistent and timely manner with employees.

### *Workers*

- Cooperate with their supervisor through the disciplinary process
- Take every reasonable precaution to correct the actions or behaviour as discussed with the supervisor

### *Subcontractors*

- Comply with the MGI Construction Corp. rules and site-specific rules
- Communicate the rules to their workers
- Cooperate with the project supervisor through the disciplinary process

## References

- Duties of employers – Occupational Health and Safety Act, s. 25, 26
- Duties of constructors – Occupational Health and Safety Act, s. 23

- Duties of supervisors – Occupational Health and Safety Act, s. 27
- Duties of workers – Occupational Health and Safety Act, s. 28





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## Company Policy

*Fleet Safety*



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## Objective

The use of a company vehicle is a privilege. Only those employees who meet driver requirements, comply with company policies and procedures, and retain all legally required licenses and credentials will be permitted to operate a company vehicle.

The purpose of MGI Construction's fleet safety is to ensure that drivers understand their responsibilities and the company's driver performance expectations. While a comprehensive fleet management and safety program reduces vehicle-related operations and insurance costs, the most important purpose of this policy is protecting the safety of our team and the community.

Our efforts and the commitment of employees will prevent vehicle accidents and reduce personal injury and property loss claims. We require the full cooperation of each driver to operate their vehicle safely and to adhere to the responsibilities outlined in this policy, as well as their specific job roles.

## Scope

This policy applies to all vehicles owned or leased by MGI Construction Corp. and to all drivers who operate these vehicles as part of their job function.

All drivers must minimally:

- Possess a valid, unrestricted driver's license (restrictions for vision or classification of the motorized vehicle i.e., motorcycle or CDL could be acceptable or even required dependent upon company/position requirements).
- Motor Vehicle Record: pass a Motor Vehicle Record (MVR) check within defined parameters in this policy.
- Driver Agreement: annually (pending changes of initial agreement) certify acceptance of driver agreement or each time they order a new vehicle or, are assigned to a new company vehicle.
- Compliance: agree to comply with all MGI Construction policies related to the use of the company vehicle.

## New Drivers

Each new driver hired by MGI Construction, whether temporary or full time, will participate in an orientation. This will ensure that all new employees receive appropriate education and training to enable them to achieve safe and productive performance of their job functions and responsibilities. At this time, all required training/certification will be collected.

Upon acceptance of a position at MGI, each new driver may spend 1-5 working days accompanied by another company driver before he/she drives alone in a company

commercial vehicle. If at that point the driver is found to be a good fit, they will review this policy and sign off that they understand. Otherwise, if they are not found to be competent, we will ask that the new driver improves their skills before driving for MGI Construction Corp.

## Authorized Drivers

Only the authorized driver may operate the company vehicle provided they have a valid, unrestricted, Driver's license and have passed the MVR requirements. No other individual is authorized to operate the vehicle. Pre-license, temporary permits, work only permits or a suspended license are not permitted.

## Use of Company Vehicle

The company vehicle is to be used primarily by the authorized driver within the scope of their job duties. Company vehicles are not to be used in the scope of any other employment by the employee or any other authorized driver.

## Company Expenses

In addition to providing the vehicle for use, MGI Construction will pay for fuel, maintenance, licence and title fees and related annual taxes, business use tolls, and insurance costs. Other covered expenses dependent upon review as appropriate within the scope of employment and duties could include vehicle rental or counsel.

## Driver Responsibilities

Seat belts must be worn by the driver at all times the vehicle is in motion. This also applies to each passenger in the vehicle at all times.

## Driver Conduct

*MVR Violations:* within 24 hours of receiving a speeding, collision, or any other moving violation, the driver must provide a copy of the ticket to MGI Construction.

*Traffic Laws:* all company vehicles shall be operated in compliance with all provincial, federal, zsdand local laws at all times.

*Collision Reporting:* unless physically unable, it is the driver's responsibility to immediately report collisions or damage to their direct supervisor, fleet manager, or similar.

*Suspended/Revoked Drivers License:* if a driver's licence is suspended, revoked, restricted, or confiscated for any reason, the driver is required to not drive the vehicle and notify the fleet manager or person overseeing the driver's position at MGI within 24 hours.

**Alcohol/Drugs:** operation of a vehicle while under the influence of alcohol or intoxicants is strictly prohibited. This includes prescribed medications which may impair the driver's ability to operate a motor vehicle safely. If employees are taking medications that may potentially impact their ability to drive, they must notify the fleet manager or person overseeing the driver's position at MGI before driving to assess capabilities. Drivers may be asked to provide a physician's return to work statement or permission to operate a motor vehicle if there are any questions relating to the employee's prescribed medications. Without exception, if law enforcement issues a citation or the driver's licence is confiscated for suspicion of DUI/DWI while driving a company vehicle, the driver will face immediate termination pending investigation. If law enforcement issues a citation or a driver's licence is confiscated for suspicion of DUI/DWI while driving any other non-company vehicle, the driver is required to immediately notify the fleet manager or person overseeing the driver's position at MGI and cannot drive the company vehicle pending investigation, which could lead to termination. Failure of the driver to notify the fleet manager or person overseeing the driver's position at MGI within the required time frame of a change status with regard to driving privileges is a violation of company policy and could result in termination.

**Cell Phone Use/Distracted Driving:** if a mobile/wireless device is used while operating a vehicle, it must be used hands-free and in compliance with all applicable laws and regulations within the province or state the vehicle is being driven. This applies to all uses of such devices including GPS devices, which may not be programmed while driving. Exceptions include: any person reporting a medical emergency, a safety hazard or criminal activity, or drivers using a voice-operated navigation system affixed to the vehicle.

**Fuel Purchases:** all fuel purchases should be made with your company fuel card.

**Geotab GO Device Tampering:** MGI Construction has installed a Geotab GO device in all fleet vehicles. The purpose of this device is to assist in managing both fleet operations and driver performance. Removing, uninstalling, or altering this device in any way is prohibited and is considered damage to company property. Any issues relating to device operations should be addressed to the fleet manager.

**License Plate/Emissions/Safety Stickers:** driver is responsible for ensuring that the license plates and vehicle registration are current and non-expired. The fleet manager is responsible for renewing this documentation.

**Non-Smoking:** smoking of any kind (e.g., vaping) is not permitted inside the company vehicle.

**Primary Use:** the company vehicle is not to be used in the scope of any other employment and only for approved MGI Construction business use.

**Vehicle Condition and Return:** drivers are responsible for maintaining the vehicle in good condition at all times. At the time you return the vehicle, you shall provide all sets of keys,

fuel card, and return the vehicle clean, inside and out, without damage, and with a full tank of gas. Failure to comply with this requirement could result in the employee paying for cost of key replacement and vehicle cleaning.

## Maintenance Management Program and Maintenance Schedule

### *Vehicle Inspection*

Proper maintenance of vehicles and equipment is an important aspect of this policy and program. Reduced operational costs and accidents from vehicle defects are the direct result of a well-implemented maintenance program.

*Light vehicles:* employees are responsible for coordinating with MGI's fleet management personnel for all regular maintenance performed on a kilometer/mileage or time basis. Any major defects must be reported immediately.

*Heavy vehicles:* employees operating heavy vehicles must perform a 360-check (circle check) and fill in an inspection report before operating the heavy vehicle. If the employee is tagging a trailer, they must perform a 360-check on the trailer and fill in an inspection report for the trailer as well.

### *Vehicle Maintenance*

Vehicle maintenance can take three (3) distinct forms: preventative maintenance, demand maintenance, and crisis maintenance.

1. *Preventative Maintenance (PM):* performed on a kilometer/mileage or time basis. Typical PM includes oil/filter changes, lubrication, tightening belts and components, engine tune-ups, brake work, tire rotation, hose inspection/replacement, and radiator maintenance.
2. *Demand Maintenance:* performed only when the need arises. Some vehicle parts are replaced only when they fail. These include light bulbs, window glass, gauges, wiring, air lines, etc. Other demand maintenance items involve worn vehicle components. These include tires, engines, transmissions, universal joints, brushings, batteries, etc. Since these situations are identified through periodic vehicle inspection, they can be classified within the PM program.
3. *Crisis Maintenance:* involves a vehicle breakdown while on the road. While situations of this type may happen regardless of the quality of the PM program, it is an expensive alternative to not having an effective preventive maintenance program at all. Crisis maintenance situations should be minimized through proper PM procedures.

A well-maintained vehicle is a safe vehicle. Regular maintenance is a vital part of a complete driver safety program. Each driver is required to follow the maintenance

requirements. Failure to maintain a company vehicle as required could result in the driver being required to personally pay for the full cost of any repairs.

## Maintenance Requirements

The driver is responsible for scheduling and obtaining all maintenance on the company vehicle. This includes routine maintenance, mechanical repairs, and collision repairs. All required maintenance must be performed at an authorized fleet service vendor in compliance with MGI Construction. Drivers must present their eFleets maintenance card prior to having their vehicle serviced. All payments will be approved through eFleets and the fleet manager.

### *Neglect/Abuse*

If an engine, transmission, or other major operating system fails because of your neglect or abuse of operation, or the vehicle is damaged or involved in a collision due to your negligence, you may be charged personally for up to the full cost of needed repairs pending review.

### *Passengers*

Drivers operating company vehicles may only carry approved passengers. For the safety of our drivers, hitchhikers are prohibited from riding in company vehicles. Approved passengers are those individuals who need to ride in the vehicle to conduct company business, such as other employees, vendor representatives, or the driver's family and friends.

### *Vehicle Condition/Decals or Bumper Stickers*

Drivers are responsible for maintaining the appearance and cleanliness of their assigned vehicle:

- Smoking is prohibited in all company vehicles.
- Eating or drinking in vehicles should be limited to avoid interior damage.
- The assigned driver is responsible for removing all trash from the vehicle on a daily basis to maintain cleanliness.
- Bumper stickers or partisan political signage of any type may not be placed on the vehicle.

## Geotab GO Device

The Geotab GO Device collects and responds to common status information in your vehicle. This includes vehicle location, speed, seatbelt usage, idling, vehicle handling, collision notification, engine RPM, engine light, odometer, engine hours, emissions, vehicle identification number (VIN), and vehicle battery voltage. Our goal is to utilize the

data collected to improve driver safety through the recognition of good driving behavior and to optimize vehicle expenses.

*Seat Belt Usage:* the device tracks and notifies when the driver isn't wearing a seatbelt while the vehicle is moving.

*Vehicle Handling:* engine revving, harsh braking, harsh acceleration or harsh cornering causes vehicle damage and creates a safety risk to those around you. Your Geotab device tracks these events and issues a warning whenever driver behavior indicates a violation of company parameters related to vehicle operations. While it may be necessary to engage in these behaviors to avoid a hazard or prevent a collision—a pattern of harsh vehicle handling will result in driving training and possible disciplinary action up to and including termination.

*Speeding:* drivers are expected to obey posted speed limits and know local guidelines for unposted areas. Additionally, it is the responsibility of the driver to reduce their speed where hazards exist or where inclement weather poses risk(s). The fleet manager will be notified when drivers exceed posted speed limits or maintain speeds over the posted limit for an extended period of time. A pattern of speeding or failure to obey posted laws will result in driving training and possible disciplinary action up to and including termination.

*Idling:* vehicle idling results in excess fuel usage and unnecessary engine wear. It may also result in fines and citations if driver idling time exceeds legal limits. As such, idle time is one of the many metrics captured by your in-vehicle tracking device.

*Engine Diagnostics:* MGI Construction will have access to detailed reporting information alerting the fleet manager to potential critical engine health issues and easily prioritize the repairs for your vehicles. We will focus on proactive vehicle maintenance by detecting issues early on and set up vehicle maintenance reminders to minimize vehicle breakdowns and keeping our drivers safe and on the road.

*Possible Collision Notification:* if the accelerometer in the device detects a change in speed of more than 25 km/h in 1 second in any direction, the fleet manager will receive an immediate notification. If possible, the device will send detailed forensic information about position, speed and acceleration of the vehicle. This important feature alerts MGI Construction of a potential unsafe situation for our driver who may need help, and at the same time provides valuable information that can be used to help determine fault or in the case of hit and run, the exact time it occurred.

## How the Driver Safety Program Works

Drivers accumulate points for each violation or collision involving a company vehicle. The total count of points requires the driver to take specific actions.

The driver risk assessment is the combined total of points based on a three-year history of the driver's Motor Vehicle Record (MVR—see Table B below) and Preventable Collision

Record (PAR—see Table C below). Table A outlines the compliance required based on the driver's total number of points between their MVR and PAR.

Table A: *Total Points Action*

Total Points (MVR + PAR)	Compliance Requirement
1-9	No Action
10-19	Written warning. Driver to complete assigned safety training within 30 days.
20-24	Written warning. Driving eligibility in jeopardy. Driver to complete specified safety training completion required within 7 days.
25	Immediate removal from driving eligibility. Termination is possible.

Table B: *MVR Point Assessment*

Type of Conviction	Examples	Points
Severity Level 1	DUI, driving on a revoked license, felony offenses, fatal collision violation, manslaughter, hit & run, leaving the scene of a collision	25
Severity Level 2	Reckless driving, Driving 30 kph > speed limit	20
Severity Level 3	Speeding < 30 kph, Seat Belt Violations	7
Severity Level 4	All other violations or offenses	5

Once a collision has been determined preventable, points are added to the driver's PAR based on the total collision cost to repair the damages to the company provided vehicle only.

Table C: *PAR Point Assessment*

Total Collision Cost to Company Vehicle	Points
\$0 - \$1000	3
\$1000 - \$3000	6
\$3000 and over	9

A preventable collision is any event in which the driver is determined to be at fault for damage to, or damage caused by, the driver's behavior with the company vehicle resulting in a financial liability or loss to the company. A preventable collision by a family member or unauthorized driver also counts towards the employee's preventable collision record.

## Defensive Driving Guidelines

Provided is a list of defensive driving techniques. Adoption of these techniques may significantly reduce collisions.

- Maintain a safe following distance at all times.
- Keep a two second interval between your vehicle and the vehicle immediately ahead. During slippery road conditions, the distance should be increased to at least four seconds.
- Yield the right of way at all traffic control signals and signs.
- Be prepared to yield for safety's sake at any time. Pedestrians and bicycles in the roadway always have the right of way.
- Honor posted speed limits.
- In adverse driving conditions, reduce speed to a safe operating speed that is consistent with the conditions of the road, weather, lighting, and volume of traffic.
- Consistently utilize the vehicle's turn signals to show where you are heading.
- Be alert of other vehicles, pedestrians, and bicyclists when approaching intersections.
- Never speed through an intersection on a caution light.
- When the traffic light turns green, look both ways for oncoming traffic before proceeding.
- When waiting to make left turns, keep your wheels facing straight ahead. If rear-ended, you will not be pushed into the lane of oncoming traffic.
- Do not pull so far forward when waiting to make left turns that you block the intersection in the event of an approaching emergency vehicle.

In the event a vehicle is involved in a collision, is vandalized or has physical damage, the driver must immediately contact the fleet manager.

Drivers must take steps to prevent further damage or injury and obtain all pertinent information required to file an accurate report.

Following a collision:

1. Call for medical aid if necessary.
2. Call the police. All collisions, regardless of severity, must be reported to the police.
3. Follow all directions issued by police, fire, and rescue personnel.
4. Record names and contact information for drivers, witnesses and occupants of vehicles.
5. Do not discuss the collision with anyone at the scene except the police.

6. Do not apologize or accept responsibility for the collision or argue with anyone regarding who is at fault.
7. Whenever possible, take photos of the collision using your phone to provide additional documentation.
8. Provide the other party with your name and insurance information.
9. Immediately report the collision to the fleet manager.
10. Provide the collision report, your completed collision forms, and your written description of the collision to your supervisor within two business days of the collision.

There will be a formal collision review conducted on all collisions to determine the cause and how the collision could have been prevented. It is the driver's responsibility to participate in this investigation by providing relevant information to and complying with the assigned investigator. Failure to comply with an investigation may result in disciplinary action up to and including termination.

The driver will be responsible for providing complete details of the collision along with details on any other vehicles and other drivers involved.

## Responsibilities

### *Employer*

- Ensuring that documentation required by this policy is collected and monitored regularly.
- Implementing a hiring program for new drivers designed to eliminate any problem areas that may affect the company's ability to perform.
- Ensuring that all vehicles owned or leased by the company are maintained in safe operating condition.
- Ensuring that commercial vehicles are operated by trained and competent drivers
- Ensuring that all reasonable precautions are taken to protect worker safety.
- Ensuring that all incidents involving company vehicles and drivers are investigated.
- Ensuring that drivers are not required to exceed maximum hours of service.

### *Drivers*

- Using safe driving practices at all times.
- Submitting vehicle-related documentation as required.
- Advising management immediately when vehicles require maintenance or repair.
- Cooperating with an inspector during a roadside inspection.
- Reporting all events related to company drivers and vehicles.
- Maintaining a valid driver's licence.



## Acknowledgement

By signing below, you are indicating that you have read, agree with, and will comply with MGI Construction's Fleet Safety Policy. MGI reserves the right to modify vehicle policies at any time. Your continued use of a vehicle following the posting of any amendment, modification or change shall constitute your acceptance of any amended terms.

## *Driver Information*

Name \_\_\_\_\_

Date \_\_\_\_\_

Signature \_\_\_\_\_

## *Vehicle Information*

Unit # \_\_\_\_\_

VIN \_\_\_\_\_

Licence Plate \_\_\_\_\_



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January 10, 2024



**Company Policy**  
*Preventative Maintenance*



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## Objective

In addition to ensuring that workers use tools and equipment properly, tools and equipment must be properly inspected, maintained, and kept in good condition. MGI Construction Corp.'s maintenance program will reduce the risk of injury, damage, and lost time. The preventative maintenance program includes a system for scheduling and recording all maintenance work.

## Scope

This procedure applies to all company employees.

## Definitions

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

## Preventative Maintenance Program

MGI Construction Corp. has established a preventative maintenance program for scheduling and recording all maintenance work. All vehicles, machinery, tools, and equipment shall be maintained in safe and working condition.

## Inventory

An inventory list will be maintained as part of the preventative maintenance program. The list will be compiled to ensure that no equipment is overlooked. Items included on the list are those that require scheduled servicing, adjusting, or replacing components which can include: power tools, mobile equipment such as skid steers, lift trucks, company vehicles, trailers, etc.

The inventory list will also include the last maintenance date, maintenance frequency and the next scheduled maintenance date of each item. Maintenance records will be retained.

## Guidelines and Standards

All equipment and vehicle must be inspected and maintained per the following:

- The manufacturer's recommendations
- Industry's regulations and standards
- Legislative requirements

Operators manuals will be reviewed and be available with all equipment. All equipment will be inspected and maintained by a competent inspector.

## Inspection Checklists

The frequency of inspections must adhere to the manufacturer's recommendations, industry standards, and legislative requirements. Standard checklists will be used for each type of equipment and made available to each operator.

## Overdue/Defective Tools, Equipment, and Vehicles

### *Mobile Equipment/Vehicles*

During an inspection, if a deficiency or an overdue item for service is found:

- Document the deficiency or overdue service on the inspection checklist.
- Notify the supervisor.
- Remove the equipment/vehicle from use.
- Schedule the required maintenance.
- Do not use the equipment until proper corrective action is taken.

### *Power Tools/Hand Tools/Extension Cords*

During an inspection, if a deficiency is found:

- If an extension cord is damaged, cut the cord and dispose of it to ensure it is not used on-site.
- If a power/hand tool is damaged, tag the equipment and remove it from use.
- Send the defective equipment for repair or replacement.
- Notify the supervisor.
- Do not use the tool or cord until proper corrective action is taken.

## Scheduled Inspections and Maintenance

All mobile equipment is to be inspected and maintained according to the following equipment inspection schedule as a guideline. Note that type and schedule may vary based on each piece of equipment.

Type of Equipment	Type of Inspection	Schedule
Lifting Devices	Certification	Legislative Requirement
	Critical Items (e.g., controls, overall functioning)	Before Use
	Safety Devices (e.g., hooks, cables, electrical)	Monthly
	Complete inspection	Before Use

	Repair	When failure occurs
	Preventative maintenance	Manufacturer's recommendation
Vehicle	Complete	Legislative Requirement
	Motor Vehicle Inspection	Before Use
	Repair	Failure
	Preventative Maintenance	Manufacturer's Recommendation
Heavy Equipment	Complete	Legislative Requirement
	Pre-Use	Before Use
	Repair	Failure
	Preventative Maintenance	Manufacturer's Recommendation
Small Equipment	Complete	Every 3 months
	Repair	Failure
	Preventative Maintenance	Manufacturer's Recommendation
Compressors, Welding Machines, Generators	Complete	Before Use
	Repair	Failure
	Preventative Maintenance	Manufacturer's Recommendation
Miscellaneous	Complete	Before Use
	Repair	Failure
	Preventative Maintenance	Manufacturer's Recommendation

## Operator Qualifications and Training

All individuals who operate mobile equipment, cranes, vehicles, etc. must have the appropriate skills, accreditation, and/or certification. This applies to both company employees and contracted equipment services.

The approval process for this standard includes the following:

- Possession of a valid driver's/operator's license appropriate for the type of equipment.
- Successful completion of a practical operating examination administered by competent and authorized personnel.
- No known history of physical disability or impairment related to the safe operation of the equipment.
- The operator acknowledges and is familiar with:
  - safety requirements for the piece of equipment which they intend to operate
  - manufacturer's operating and maintenance procedures
  - communication procedures related to maintenance, repair, or similar

- hand signals set by the company or dictated by site conditions

## Maintenance Personnel Qualifications

All individuals who perform maintenance work will have the appropriate skills, accreditation, and/or certification. This certification applies both to company employees and contracted maintenance services.

## Records and Review

The records of each maintenance activity will be maintained as part of MGI Construction Corp.'s preventative maintenance program. The information such as what type of maintenance work was done, when, and by whom will be recorded on a telematic web database. The database will monitor upcoming and scheduled preventative maintenance. Records of inspections and maintenance are reviewed by mechanics and management. When applicable, corrective action plans derived from the review of records will be developed, monitored and stored in MGI's database.

## Responsibilities

### *Management*

- Develop an inventory of equipment requiring preventative maintenance.
- Develop preventative maintenance and inspection checklists for all equipment requiring preventative maintenance.
- Ensure equipment is inspected and maintained by a competent person.
- Follow up on corrective actions as required.

### *Supervisors*

- Ensure all preventative maintenance activities are conducted according to schedule.
- Follow-up on corrective action plans for equipment in need of maintenance work
- Document once corrective actions are taken.

### *Workers*

- Complete preventative maintenance inspections assigned to them as per the frequencies outlined for each piece of equipment.
- Document any deficiencies found and submit the checklist to supervisor.
- Do not use defective equipment.
- Have the appropriate skills, accreditation and/or certification.

### *Maintenance Personnel*

- Have the appropriate skills, accreditation and/or certification.
- Provide maintenance services per the manufacturer's recommendations, industry's regulations and standards, and/or legislative requirements.

## References

Construction Projects Regulation O. Reg. 213/91, Equipment, General, s. 93-116  
Duties of employers – Occupational Health and Safety Act, s. 25, 26  
Duties of constructors – Occupational Health and Safety Act, s. 23  
Duties of supervisors – Occupational Health and Safety Act, s. 27  
Duties of workers – Occupational Health and Safety Act, s. 28





Document #COP02010007  
January 30, 2024



**Company Policy**  
*Progressive Discipline*



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## Objective

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

## Scope

This procedure applies to all employees and subcontractors at MGI Construction Corp. All employees are required to comply with all legal requirements concerning the health and safety of workers in the workplace, as well as the practices and procedures and any other requirements of the company's health and safety program. The company will not condone any breach of legal requirements or the health and safety program. Subcontractors are also required as part of the sub-contractual agreement to comply with the MGI Construction Corp.'s health and safety policy and program.

## Definitions

*Progressive discipline* is a process for dealing with job-related behavior that does not meet expected and communicated performance standards.

## Procedure

Employees and subcontractors who willfully act in violation of the company safety rules and/or the Ontario Occupational Health and Safety Act and Regulations will be subject to any of the following disciplinary actions as is appropriate:

1. Verbal warning
2. Written warning
3. Workplace suspension
4. Termination

All steps may not be followed (as a grouping) and action will be determined by the severity of the actions being addressed. Supervisors are responsible for following this process to maintain acceptable levels of performance and conduct, as well as a safe workplace. Supervisors must document any of the above types of warnings to workers.

### *1. Verbal Warning*

When a supervisor identifies that a worker is not compliant, and if informal discussions with the worker have failed to resolve the problem(s), a verbal warning from the supervisor will be given.

## *2. Written Warning*

A written warning is a record of a more serious situation or a recurrence of a problem previously noted in the verbal warning(s). The written warning must be read to the worker and an acknowledgment as to why this occurred should be made.

## *3. Suspension*

Suspension can take place in extreme cases such as willful misconduct, disobedience or willful neglect of duty, danger to other employees, or as a recurrence of a problem previously noted in verbal and written warnings.

## *4. Termination of Employment*

Termination of employment is the final step in the progressive disciplinary process. This step may involve supervisors, managers as well as senior management. All investigative materials along with any previous disciplinary documentation are to be kept and maintained as part of company property.

If a subcontractor refuses or neglects to rectify a hazardous condition, practice or any violation, MGI Construction Corp. shall exercise the right to take immediate steps to correct the unsafe condition at the expense of the responsible parties. MGI Construction Corp. may also remove any individual who continues to cause the unsafe condition to remain or performs in a manner not consistent with the guidelines of the Occupational Health and Safety Act, applicable regulations, company practices and procedures from the workplace.

Violations to the following safety concerns represent a serious level of neglect and MGI Construction Corp.'s supervisor or his competent replacement or substitute have the right to exercise a "zero tolerance" policy and have the violator(s) dismissed from the workplace. No further warnings are required. Examples include:

- Fall Protection Violations
- Electrical or Mechanical Lock-out Violations
- Fire Prevention Violations
- Trenching Violations

## **Responsibilities**

### *Management*

- Assist with any disciplinary actions as required (i.e. suspension or termination).
- Enforce compliance with company rules and legislation.

### *Supervisors*

- Oversee and implement the disciplinary procedure.
- Fill out disciplinary documentation, as required.
- Ensure the progressive discipline procedure is communicated to each worker as part of orientation before the commencement of work.
- Address performance and disciplinary problems in a consistent and timely manner with employees.

### *Workers*

- Cooperate with their supervisor through the disciplinary process.
- Take every reasonable precaution to correct the actions or behaviour as discussed with the supervisor.

### *Subcontractors*

- Comply with the company rules and site-specific rules.
- Communicate the rules to their workers.
- Cooperate with the project supervisor through the disciplinary process.

### *References*

Duties of employers – Occupational Health and Safety Act, s. 25, 26  
Duties of constructors – Occupational Health and Safety Act, s. 23  
Duties of supervisors – Occupational Health and Safety Act, s. 27  
Duties of workers– Occupational Health and Safety Act, s. 28



Document #COP01010006  
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**Company Policy**  
*Green Hand-Gold Hand*



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MGI Construction Corp. has adopted the Green Hand-Gold Hand program, originally established by the Canadian Petroleum Council in 2001, as a way to reduce injuries caused by new workers on site. The purpose of implementing this program is to engage new or inexperienced workers ('Green Hands') in safety-related conversations with experienced workers ('Gold Hands'), who have proven knowledge of and experience with the company's safety program.

This is accomplished by raising the visibility of each worker:

- New or inexperienced workers are given Green Hand stickers to wear on their hard hats, making them immediately recognizable as inexperienced.
- Experienced workers, who would like to participate, are given Gold Hand stickers to wear on their hard hats, making them immediately recognizable as individuals to whom Green Hands can turn for assistance or guidance.

Note: The Gold Hand is a voluntary title and should not be assigned to a worker who is not comfortable in a mentorship role.

#### What does the Green Hand Mean?

- I am new to my job or this job site.
- I am not familiar with the company's safety policies and procedures.
- I will probably have a lot of questions about safety.
- I may need your help at some point, so please introduce yourself, offer your advice, and be patient with me.

#### What does the Gold Hand Mean?

- I am an experienced construction worker.
- I am very familiar with the company's safety policies and procedures.
- I have agreed to be a safety mentor. If you have any questions, ask me. I'll be happy to answer.
- I value safety and will approach you and offer assistance if I see you doing something that might be unsafe.

Increasing the visibility of experienced and inexperienced workers on a job site is a proven method for maintaining site safety. Both groups become more approachable to each other, which makes it easier to ask for help or offer assistance. The more awareness of and interactions about workplace health and safety, the more we can avoid workplace injuries and create a culture of safety on every job site.



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**Company Policy**  
*Company Rules*



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## Objective

To outline MGI Construction Corp.'s expectations for employees about their behaviour, actions towards other members of the company and in the workplace. Specifically, to ensure that all employees, contractors, and others at the workplace, understand and strictly adhere to the provisions of the Occupational Health and Safety Act, all applicable regulations, company practices, guidelines, and procedures.

## Scope

This policy applies to all employees of MGI Construction Corp. regardless of employment conditions or rank.

## Code of Conduct

### *1. Compliance with the Law*

All employees must protect our company's legality—municipally, provincially, and federally. In Canada, the law applies to everyone, including the police, the government, and public officials. Laws can be divided into public and private law. Public laws set the rules for the relationship between a person and society and the roles of different levels of government. This includes criminal law, Constitutional law, and administrative law. Employment at MGI Construction Corp. implies that you are subject to the law, as you would with any other organization, and will be held fully responsible for compliance within it.

Canadian laws recognize and protect basic rights and freedoms, such as liberty and equality. Employees must comply with all environmental, safety, and fair dealing laws. We expect employees to be ethical and responsible when dealing with our company's finances, products, partnerships, and public image.

### *2. Respect in the Workplace*

All employees should respect their colleagues. MGI Construction Corp. will not allow any kind of discriminatory behaviour, harassment, or victimization. Employees should conform with our equal opportunity employer policy and workplace violence and harassment policy in all aspects of their work, from recruitment and performance evaluation to interpersonal relationships.

### *3. Protection of Company Property*

All employees should treat our company's property, whether material or intangible, with respect and care. Employees should not misuse company equipment or use it frivolously. They must respect all kinds of incorporeal property (this includes trademarks, copyright, and other property such as information, or reports). Employees should use company property only to complete their job duties.

Employees should protect company facilities and other material property (e.g., company vehicles) from damage and vandalism, whenever possible. Damage or misuse of company property should be reported and handled within the progressive discipline policy where appropriate.

#### 4. Professionalism

- *Dress Code and Personal Appearance:* all employees must follow our dress code as it pertains to occupational health and safety. Within reason, self-assessments must be made as to what grooming, attire, or other aspects of personal appearance (e.g., facial hair, tattoos) may violate our workplace violence and harassment policy.
- *Corruption:* we discourage employees from accepting gifts or similar from clients or partners. We prohibit bribery for the benefit of any external or internal party.
- *Job Duties and Authority:* all employees should fulfill their job duties with integrity and respect toward customers, stakeholders, the community, and the environment. Supervisors and management must not abuse their authority. We expect them to delegate duties to their team members while considering their competences and workload. Likewise, we expect team members to follow team leaders' instruction and complete their duties with skill and in a timely manner. We encourage mentoring throughout our corporate structure with the purpose of collaboration and career progression.
- *Absenteeism and Tardiness:* employees should follow their schedules as provided by supervisors or management. MGI Construction Corp. can make exceptions for occasions that prevent employees from following standard working hours or days but in general, we have an expectation that employees will be punctual when coming to and leaving from work.
- *Conflict of Interest:* we expect employees to avoid any personal, financial, or other interests that might hinder their capability or willingness to perform their job duties. Other aspects of this and the accountability of such matters are outlined in the employee confidentiality agreement.
- *Behaviour:* employees should be friendly and collaborative. They should try not to disrupt the workplace or present obstacles to their colleagues' work. All employees must be open to communication with their colleagues, supervisors, or team members.
- *Benefits and perks:* we expect employees not to abuse their employment benefit or company perks. This can refer to time off, insurance, fuel for vehicles or equipment, personal protective equipment items, facilities, subscriptions, electronics, or other benefits our company offers currently.

## Safety Rules

1. If you notice any unsafe practice or condition on the job, you are obligated by law and by the company to report the situation immediately to your supervisor so that corrective action can be taken.
2. All injuries and accidents/incidents must be reported immediately to your supervisor. The supervisor will conduct his/her investigation and report it to management.
3. All relevant personal protective equipment must be worn when required. Personal protective equipment must be inspected prior to use.
4. All workers must have proof of training while working on-site.
5. All work shall be carried out as per the Occupation Health and Safety Act, applicable regulations, company practices and procedures.
6. The workplace must remain in clean and orderly condition. Proper housekeeping must take place throughout the workplace to eliminate potential hazards.
7. No possession or consumption of alcohol or drug (reference MGI's policy on substances for more information) is permitted while at the workplace.
8. Smoking is strictly prohibited near flammable or combustible gases and materials and in all storage areas.
9. Fighting, horseplay or otherwise interfering with other workers is prohibited.
10. Theft, vandalism or any other abuse or misuse of any property is prohibited.
11. Tools and equipment shall be inspected before each use and shall only be used in good condition. Do not remove any guards or safety devices.
12. Do not operate any machinery unless you have been properly trained for the task.
13. Always seek assistance or use mechanical lifting devices when attempting to lift heavy material.
14. Do not attempt any work that you feel is unsafe or may place yourself or others in danger. If you feel incapable of performing a task, advise your supervisor.

## Progressive Discipline

Employees and contractors who willfully act in violation of the code of conduct, company safety rules or the Ontario Occupational Health and Safety Act and Regulations will be subject to any of the following disciplinary actions. This is enforced consistently throughout all levels of the organization. All Steps may be following, as a grouping, and action will be determined on the severity of actions being addressed.

1. Verbal Warning
2. Written warning
3. Workplace suspension
4. Termination

For further information on progressive discipline, please see the Progressive Discipline Company Policy (#COP02010007).

## Communication

Standard rules and worksite specific rules will be available for employees. The code of conduct and safety rules are available in the company policy book and posted on each worksite safety board.

Code of conduct and safety rules training is provided during orientation and site-specific toolbox talks topics are delivered on a weekly basis. If any company employee needs further clarification or explanation, they are encouraged to speak with their supervisor. Barriers with understanding will be accommodated.

## Responsibilities

### *Management*

- Assist with development of company rules and code of conduct.
- Enforce compliance with company rules and legislation.
- Assist with disciplinary actions as required.

### *Supervisors*

- Enforce company code of conduct and safety rules to all workers.
- Ensure the progressive disciplinary procedure is communicated to all worker and enforced when seeing violations.
- Address violations in consistent and timely manner with employees.
- Provide recommendations to management about safety rules.
- Report to management when disciplinary actions require suspension or termination.
- Maintain acceptable levels of performance, conduct and a safe workplace/worksite.
- Document any disciplinary steps taken.

### *Workers*

- Follow the code of conduct and safety rules as states in the company policy.
- Cooperate with supervisors and management through the disciplinary process.

### *Contractors*

- Comply with company and site-specific rule.
- Communicate rules with their workers.
- Cooperate with project supervisor through disciplinary process.

## References

Duties of employers – Occupation Health and Safety Act s. 25, 26  
Duties of constructors – Occupation Health and Safety Act s. 23  
Duties of supervisors – Occupation Health and Safety Act s. 27  
Duties of workers – Occupation Health and Safety Act s. 28  
Codes of practice – Occupational Health and Safety Act s.32  
General Construction – Occupational Health and Safety Act s.21





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January 10, 2024



**Company Policy**  
*Training & Communication*



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## Objective

MGI Construction Corp. is committed to ensuring that all employees have the necessary instruction and training required to ensure their safety on the job and to ensure effective systems are in place to communicate health and safety information to all employees.

## Scope

This training and communication program applies to all MGI employees. It includes:

- The roles and responsibilities of relevant workplace parties in providing training.
- The mandatory safety and job-specific training required by all new employees.
- A process of providing required orientations.
- A process for delivering safety talks as a means of communicating health and safety information.
- The required company-wide health and safety meetings to be held by senior management.

## Definitions

*Competent person* means a person who:

- is qualified because of knowledge, training and experience to organize the work and its performance.
- is familiar with this Occupational Health and Safety Act and the regulations that apply to the work.
- knows any potential or actual danger to health or safety in the workplace

*Competent worker*, in relation to specific work, means a worker who:

- is qualified because of knowledge, training and experience to perform the work.
- is familiar with the Occupational Health and Safety Act and with the provisions of the regulations that apply to the work.
- knows all potential or actual danger to health or safety in the work.

## Orientation and Training

The training program developed by MGI Construction Corp. reflects the requirements set out by legislature and applies to the potential hazards involved with different job tasks at the company. It is every worker's right to know about the hazards associated with their job.

*New Employee Orientation:* on the first day of employment, employees are required to complete MGI's orientation. New employees will be given a tour of the physical work environment and be provided with essential health and safety information and guidance.

As part of the orientation, the trainer and the new employee will review the new employee checklist. Young and/or inexperienced workers may need additional training or mentoring. This can be reviewed during orientation and additional support, resources, or training will be arranged as required.

*Site Orientation:* any worker coming to a project site for the first time is considered a “new worker” and requires a site orientation. The supervisor is responsible for providing this orientation before the worker is allowed to begin work. This will occur through a process of physical, verbal, and or written instruction.

*Health and Safety Training:* Newly hired employees will be required to take health and safety training as part of the health and safety standards.

The following mandatory training must be completed by all employees before beginning work:

- Worker/Supervisor Health and Safety Awareness
- WHMIS-2015
- Working at Heights

Training records will be uploaded and monitored by MGI support staff on the company's electronic database. Mandatory training certificates will be reviewed on an annual basis. Expired certificates will be recorded on the electronic database and employees will be informed of their expiring certificate. Once notified, it is an expectation for the employee to schedule the training unless otherwise noted. The health and safety manager will review expiring certificates monthly and follow up as needed. Failure to complete required training will result in progressive disciplinary action.

Orientation training is mandatory for all new employees. If necessary, employees returning to work or transferring roles may need to complete orientation training again to ensure they are familiar with the company policies and health and safety standards.

*Job Hazard Assessment:* based on the employee's job task, the relevant job hazard assessment(s) will be assigned to be reviewed. The required training based on each job task is identified in the training matrix, which was developed as part of the Job Hazard Analysis.

The Safe Work Practices (SWP) and Safe Job Procedures (SJP) that apply to those tasks will also be assigned. The required SWP and SJP for each task are identified in the appendix. Employees will not be permitted to begin their job without reviewing their job hazard assessments or procedures. The reviews will be maintained in a system and monitored by MGI support staff. Employees who are promoted/transferred or returning to work will be required to take training based on their new job hazard exposure.

*Job-Specific Training:* in addition to mandatory training, based on the hazard assessment, employees may be required or recommended to take additional training (including hands-on training). This will be reviewed during the orientation.

Employees may also be trained on the following:

#### Site Supervisors

- Workplace Inspection
- Accident Investigation
- Emergency Response
- Chemical Spill

#### Health and Safety Representatives

- Health and Safety Representative Certificate

#### Joint Health and Safety Committee

- JHSC Certified Member Part 1
- JHSC Certified Member Part 2

*Training Facilitation:* management will ensure that the training is provided by a competent person(s). Training credentials from other companies will only be approved after verification. Ministry of Labour approved training providers are only approved for Working at Heights and Joint Health & Safety Committee Training.

*Administering Training:* MGI management, including human resources, will be responsible for organizing and administering orientation training. This includes outsourced training. Supervisors will be required to provide site orientation, review of JHA, SWP and SJP to new employees or those being transferred or returning to work. MGI Construction Corp. asks new employees to disclose any barriers for understanding the training provided so that accommodations can be made.

*Evaluating Training:* Training will be evaluated by confirming training checklists are completed, observing job performance, and reviewing incidents and safety violations. This will allow management to identify if additional training is required and employee compliance with company standards and policies. If an employee is purposely being noncompliant with safe work practices and standards, progressive discipline can be initiated. It is every employee's responsibility to ensure company standards are being followed to uphold health and safety in the workplace.

#### Health and Safety Communication

*Weekly Toolbox Talk:* site supervisors will conduct weekly toolbox talks with their workers. Each worker will acknowledge that they have understood the topics discussed. The topic

of the talk and the attendee's acknowledgement will be documented. Worker input is encouraged during toolbox talk discussions and during worksite inspections.

*Annual Health and Safety Meeting:* senior management will coordinate a company-wide health and safety meeting annually. The agenda will be provided in advance to all workers. Health and safety objectives of the year and an action plan will be communicated to employees. Employees are encouraged to provide their feedback and raise any concerns. The meeting minutes will be available upon request. Action plans will be updated based on the discussion with employees if required.

*Newsletters and Memos:* internal and external health and safety information, including general health and safety knowledge, changes to company health and safety policies and procedures, manufacturer updates/recalls, and/or changes to occupational health and safety regulations will be communicated to MGI employees on a monthly basis and as needed.

## Documents

- Toolbox Talk (#HSE01010003)
- Inspection Checklists (#HSE01010004)
- Management Meeting Minutes (#HSE01010061)
- Joint Health and Safety Committee Meeting Minutes (#HSE01010065)
- Employee Orientation Checklist (#ONB01010002)
- Site Orientation Checklist (#HSE01010219)

## Responsibilities

### *Management*

- Conduct annual safety meeting with all employees.
- Take employees' feedback and concerns and update the action plan if necessary.
- Allocate resources for training.
- Appoint a competent person to conduct the training.
- Maintain the credentials of the trainers.

### *Supervisors*

- Conduct orientation on the first day of official employment, or before, to a new hire.
- Conduct weekly toolbox talks.
- Complete Site orientation for a worker on the first day on the site.
- Do not assign any worker for any task without providing proper training.

### *Workers*

- Complete all training and task reviews before starting the job.

- Listen to instructions during orientations.
- Do not proceed without being properly trained on any task.
- Actively participate in toolbox talks and annual meeting and provide feedback.

## References

Occupational Health and Safety Awareness and Training Regulation O. Reg. 297/13  
Duties of employers – Occupational Health and Safety Act, s. 25, 26  
Duties of constructors – Occupational Health and Safety Act, s. 23  
Duties of supervisors – Occupational Health and Safety Act, s. 27  
Duties of workers – Occupational Health and Safety Act, s. 28





Document #COP02010030  
January 30, 2024



**Company Policy**  
*Safe Return to Work Program*



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## Objective

The Safe Return to Work (SRTW) program will facilitate a safe and early return to work for workers who have sustained a workplace injury while employed with MGI Construction Corp. The SRTW program will provide every opportunity for injured workers to return to gainful employment in the event of a disabling workplace accident.

## Scope

This procedure applies to MGI Construction Corp. employees who sustain a workplace injury or illness, and all employees involved in the SRTW. Senior management must follow this procedure.

## Definitions

*Modified work:* the modification of an employee's position that allows for the employee to carry out the work assigned within the employees' capabilities.

*Accommodation:* a change or modification to the job or workplace so that the work is within the injured or ill person's functional capabilities and the risk of injury is reduced.

Types of accommodation include:

1. *Administrative Duties*
2. *Material Transportation Monitoring*
3. *Housekeeping*
4. *Equipment/ Vehicle Detailing*
5. *Equipment/Vehicle Operation*
6. *Traffic Control*
7. *Inventory Management*
8. *Security Services*
9. *Training or Recertification*
10. *Health, Safety, and the Environment (HSE)*

## Procedure

### 1. *Injured Worker*

Workers will inform their supervisor immediately of any injury sustained in the workplace and receive prompt first aid treatment and, where required, receive medical treatment by a healthcare professional. The worker must take an injured worker's package (i.e., a letter on behalf of MGI Construction Corp. and functional abilities documentation) to the treating physician.

The worker must provide a medical assessment from a licensed physician(s) outlining any restrictions resulting from the injury/illness before returning to work to their supervisor. All information provided will be kept confidential.

## *2. Contact with the Injured Worker*

If a worker is required to take time away from work, she/he must maintain regular contact with management regarding their condition. MGI Construction Corp. will maintain correspondence to return an employee to work as quickly and safely as possible.

## *3. Re-Integration Plan*

The employer must modify the work or workplace to accommodate the needs of the injured worker. The following steps will be followed to re-integrate the worker:

1. The injured worker's supervisor/management will assess the most recent medical report(s) and provide suitable modified work that is consistent with the worker's functional abilities.
2. This will be done using the existing physical demands matrix developed through the job hazard analysis (JHA).
3. If work is modified, the injured worker will be provided with a modified job description. The injured worker must sign off on the modified duties. If management and the employee cannot agree on a workable solution, WSIB may be contacted and a mediator brought in to assist towards a resolution.
4. After modified work is agreed upon, the worker may begin work. The injured worker will be observed for a while to ensure that the work being performed does not exceed the worker's physical restrictions and that difficulties are not encountered.
5. The supervisor must maintain regular communication at least once a week with the employee to monitor the progress and effectiveness of the re-integration.
6. The worker will only return to their normal job function once given written clearance by a physician.

Management will review the follow-up/progress reports at the end of each week unless problems with the program occur during the week which immediate intervention by the management team will take place.

## *4. WSIB Reporting*

Management must report the following to WSIB:

- Any changes in wages as a result of the modified duty.
- Any changes in the duties or the duration of the program.
- The inability of the employee to comply or participate in the program.
- The completion of the program.

## Responsibilities

### *Senior Management*

- Contact the injured worker as soon as possible and stay in regular contact.
- Cooperate in providing suitable work.
- Give WSIB information as required.
- Provide workers with functional abilities documentation to take to the testing practitioner for completion.
- Educate workers about the SRTW program.
- Pay full wages and benefits for the day or shift on which the injury occurred.
- Make certain that workers understand their rights and responsibilities on the cooperation necessary while undergoing the SRTW program.

### *Supervisors*

- Advise the employee of the availability of modified duties or a transitional work program and provide the required documentation.
- Assist in the creation of and support the employee's modified duty program.
- Provide the worker with the modified work documentation.
- Maintain communication with the employee on modified duty and monitor the progress and the effectiveness on an individual basis.
- Schedule regular meetings with the employee to communicate and assist in the evaluation of the program's effectiveness.
- Communicate with the injured worker and document the communication. This communication is to be regularly, at least once a week or as frequently as may be required. This will be determined on an individual basis.

### *Workers*

- Maintain regular contact with the supervisor.
- Take an active role in developing their modified duty program.
- Communicate any concerns or problems to their immediate supervisor.
- Obtain the necessary forms from the treating agencies as may be required by the employer.
- Ensure that other scheduled rehabilitation activities, such as physical therapy or doctor's appointments are continued while on modified duty. These appointments are to be arranged whenever possible during non-work hours.
- Co-operate with all requests for documentation as required by WSIB and the employer.

### *Healthcare Professional*

- Provide health, medical, and functional abilities information as required.
- Fill in the documentation as requested.

- Act as a resource in facilitating a successful SRTW program.

## References

Workplace Safety and Insurance Act, 1997, Part V, Return to Work s. 40-42  
Duties of employers – Occupational Health and Safety Act, s. 25, 26  
Duties of constructors – Occupational Health and Safety Act, s. 23  
Duties of supervisors – Occupational Health and Safety Act, s. 27  
Duties of workers – Occupational Health and Safety Act, s. 28





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Company Policy  
*Occupational Health*



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## Objective

To protect the health and safety of the employees at the company with regard to occupational health hazards.

## Scope

This procedure applies to all MGI Construction Corp. employees.

## Definitions

*Occupational illness:* a condition that results from exposure in a workplace to a physical, chemical or biological agent to the extent that the normal physiological mechanisms are affected and the health of the worker is impaired.

## Procedure

### 1. Risk Assessment

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

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

### 2. Physical Agents

Physical agents are sources of energy that may cause injury or disease. Examples include noise, vibration, radiation, and extremes in temperature. Physical agents become the most hazardous when a worker is exposed to them over an extended period.

### 3. Biological Agents

Sources of biological hazards may include bacteria, viruses, insects, plants, birds, animals, and humans. These sources can cause a variety of health effects ranging from skin irritation and allergies to infections.

### 4. Lead

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

A significant portion of lead that is inhaled or ingested gets into the bloodstream. Once in the bloodstream, lead circulates through the body and is stored in various organs and body tissues. Some of this lead is filtered out of the body and excreted, but some remains in the blood and tissues. As exposure continues, the amount stored will increase if the body absorbs more lead than it excretes. The lead stored in the tissue can slowly cause irreversible damage, first to individual cells then to organs and lastly, to whole-body systems.

### *5. Asbestos*

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

### *6. Silica*

Silica dust and particles are a hazard on many job sites.

Silica dust and particles are generated from:

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

Inhaling silica dust and particles into the lungs often enough (duration, frequency) can cause silicosis. Silicosis is a disabling, progressive, non-reversible, often deadly lung disease. You may show no symptoms in the early stages and severe breathing problems in the later stages. Many workers with silicosis can develop other health problems such as tuberculosis and lung cancer. They can also develop complications such as heart disease.

### *7. Workplace Chemicals*

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

## 8. *Confined Space*

A confined space is defined as a place:

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

All three criteria have to be met before a space is defined as a confined space. Both physical and atmospheric hazards may exist in a confined space. Before entering a confined space, a confined space program must be in place, workers must be adequately trained, have the required personal protective equipment available and must have a rescue plan.

## Training

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

## Site Requirements

Before starting work at a site, the Site Supervisor must ensure:

- There are adequate toilet/wash-up facilities
- There is an adequate supply of potable drinking water
- SDS are readily available on site
- Workers are orientated and equipped with the necessary training



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## Company Policy

*First Aid*



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## Objective

MGI Construction Corp. is committed to ensuring that all company locations comply with the First Aid Requirements Regulation (O. Reg. 1101) under the Workplace Safety and Insurance Act, 1997.

## Scope

This First Aid Procedure applies to all MGI Construction employees.

## Definitions

*First Aid* is defined as the one-time treatment or care and any follow-up visit(s) for observation purposes only.

First aid includes, but is not limited to:

- cleaning minor cuts, scrapes, or scratches
- treating a minor burn
- applying bandages and/or dressings
- applying a cold compress, cold pack, or ice bag
- applying a splint
- changing a bandage or a dressing after a follow-up observation visit.

## First Aid Stations

All job sites must have a first aid station. First aid stations must be positioned in a conspicuous location and accessible to everyone.

A first aider as prescribed in O. Reg. 1101 station is in the charge of the first aid station.

A first aid station shall contain:

- a first aid box containing the items required by the Regulation
- a notice board displaying:
  - the Board's poster known as Form 82
  - the valid first aid certificates of qualification of the trained workers on duty
  - an inspection card(s)

No. of Workers	First Aid Station Requirements	First Aid Kit/Box Requirements
0 to 5	<ul style="list-style-type: none"> <li>• Current edition of the St. John's Ambulance First Aid Manual</li> <li>• Current edition of Reg.1101</li> <li>• First aid kit inspection form</li> <li>• First aid log</li> <li>• First aider's certificate</li> <li>• Form 82</li> </ul>	<ul style="list-style-type: none"> <li>• 1 card of safety pins</li> <li>• 12 adhesive dressings individually wrapped</li> <li>• 4 sterile gauze pads, 3 inches wide</li> <li>• 2 rolls of gauze bandage, 2 inches wide</li> <li>• 2 field dressings, 4 inches square or 2 four-inch sterile bandage compresses</li> <li>• 1 triangular bandage</li> </ul>
6 to 15	<ul style="list-style-type: none"> <li>• Current edition of the St. John's Ambulance First Aid Manual</li> <li>• Current edition of Reg.1101</li> <li>• First aid kit inspection form</li> <li>• First aid log</li> <li>• First aider's certificate</li> <li>• Form 82</li> </ul>	<ul style="list-style-type: none"> <li>• 1 card of safety pins</li> <li>• 24 adhesive dressings individually wrapped</li> <li>• 12 sterile gauze pads, 3 inches wide</li> <li>• 4 rolls of 2-inch gauze bandage</li> <li>• 4 rolls of 4-inch gauze bandage</li> <li>• 4 sterile surgical pads suitable for pressure dressings, individually wrapped</li> <li>• 6 triangular bandages</li> <li>• 2 rolls of splint padding</li> <li>• 1 roll-up splint</li> </ul>
16-199	<ul style="list-style-type: none"> <li>• Current edition of the St. John's Ambulance First Aid Manual</li> <li>• Current edition of Reg.1101</li> <li>• First aid kit inspection form</li> <li>• First aid log</li> <li>• First aider's certificate</li> <li>• 1 stretcher</li> <li>• 2 blankets</li> <li>• Form 82</li> </ul>	<ul style="list-style-type: none"> <li>• 24 safety pins</li> <li>• 1 basin, preferably stainless steel</li> <li>• 48 adhesive dressings individually wrapped</li> <li>• 2 rolls adhesive tape, 1 inch wide</li> <li>• 12 rolls of 1-inch gauze bandage</li> <li>• 48 sterile gauze pads, 3 inches square</li> <li>• 8 rolls of 2-inch gauze bandage</li> </ul>

		<ul style="list-style-type: none"> <li>• 8 rolls of 4-inch gauze bandage</li> <li>• 6 sterile surgical pads suitable for pressure dressings, individually wrapped</li> <li>• 12 triangular bandages</li> <li>• Splints of assorted sizes</li> <li>• 2 rolls of splint padding</li> </ul>
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Where there is no site office for the project, a first aid station shall be maintained in an on-site vehicle.

### First Aid Training

In Ontario workplace first aid requirements are outlined by the WSIB in O. Regulation 1101. The regulation summarizes the type of certificate, required by an employer based on the number of employees per shift.

Number of Employees (per shift)	Type of Certificate
0 to 5	Emergency First Aid (One day)
6 to 15	Standard First Aid (Two days)
16 to 199	Standard First Aid (Two days)

Both sets of training will cover CPR and the AED module.

- At least one employee from each work area per shift will receive First Aid/CPR "A"/AED training in accordance with the recommendations provided by St. John Ambulance and in accordance with O. Regulation 1101. Additional staff will be appointed to cover each shift in case of absences or if the designated first responder is the one who is injured/ill.
- The certified employee will act as the first aid attendant for the first aid station in their respective shift/workplace.
- First Aid/CPR/AED training certificates for each of the designated first aid attendants must be posted at each First Aid Station.
- First aiders must be recertified every 3 years. The training records will be maintained by management. Employees will be notified of the recertification.
- Training will be provided by a recognized training authority.

## Procedure

When an accident occurs:

1. The first trained person on location will administer first aid.
2. All injuries, regardless of severity, must be reported to the supervisor. If the first aider is unable to report it to the supervisor, they will appoint someone else to.
3. The supervisor will secure the area and remove potential hazards. Work in the area should stop.
4. The supervisor and first aider will assess the severity of the injury and determine if transportation to a medical facility is appropriate via ambulance or company vehicle.
5. The first aid trained person will stay with the injured person until help arrives and will inform medical personnel of first aid treatment given.
6. The supervisor will accompany the worker to the medical facility and notify the health, safety and environment (HSE) department.
7. The HSE manager will collect reports from people involved and complete a *Workplace Hazard Report*. The report will be held in records.
8. First aid treatment(s) will be recorded. Emergency equipment will be replaced if needed.
9. The injured worker must inform their supervisor if they decide to seek medical attention for the incident on their own.

## First Aid Treatment Log

A first aid log will be maintained by the first aid attendant(s) and will be used to document first aid treatment or advice provided by the first aid attendants in their work areas. The log must be completed by the attendant each time an employee receives first aid treatment, regardless of how minor the injury.

The following information will be entered in the log:

- Date and time of the report
- Injured worker's name
- Location (where did it happen?)
- Circumstances (how did it happen?)
- Cause of injury (i.e. slippery floor, sharp object)
- Name of witness(es)
- Description of injury (body part, location of, etc.)
- Name of the first aider
- Acknowledgement of the first aider

## First Aid Inspections

- On-site first aid kits will be inspected monthly by the HSE manager, supervisor, or designated first aid attendant for the work area.
- The inspector will examine the first aid kit in their work area and record that the inspection was completed on an inspection card in the kit.
- Any deficiencies or missing items will be notified to management.
- Management will replace the missing or damaged item immediately to comply with O. Reg. 1101.

## Transportation

An injured worker will be transported by ambulance, company vehicle, or their own vehicle depending on the severity of the injury. The first aider on-site will determine the appropriate transportation method. Management will ensure that a vehicle is always available for transporting an injured worker to a medical facility.

First aider's decisions relating to first aid, the decision to refer the injured person to a medical facility, or the means of transportation to a medical facility cannot be overruled by management.

The injured worker's decision to seek medical treatment and to which facility to receive medical aid from cannot be overruled.

## Responsibilities

### *Senior Management*

- Provide resources and set up medical/first aid facilities to comply with the Workplace Safety and Insurance Act and First Aid Regulation.
- Review first-aid treatment records annually.
- Implement appropriate preventative actions.
- Ensure training is provided by a recognized training authority.

### *Supervisors*

- Ensure that the first aid station is easily accessible at each site.
- Ensure that the first aid station is stocked as per the legislated requirements.
- Ensure the availability of a certified first aider all the time.
- Maintain, inspect, or appoint a certified first aider to be responsible for maintaining and completing a quarterly inspection of the first aid station.
- Ensure a vehicle is available at all times for transporting an injured worker to a medical facility.
- Ensure the first aider is available to accompany an injured worker to a medical facility.

### *Workers*

- Report all injuries immediately.
- Cooperate with the first aid attendant during the treatment process.
- Fill out the first aid log (if applicable).

#### *First Aid Attendant*

- Provide first aid immediately as required.
- Document when first aid treatment is given to any worker.
- Ensure first aid kits are adequately stocked.
- Inform supervisor/management immediately on any missing or damaged item.

#### *Joint Health & Safety Committee (JHSC)*

- Review first-aid logs during committee meetings.
- Provide recommendations to senior management if applicable.

#### References

Duties of employers – Occupational Health and Safety Act, s. 25, 26

Duties of constructors – Occupational Health and Safety Act, s. 23

Duties of supervisors – Occupational Health and Safety Act, s. 27

Duties of workers – Occupational Health and Safety Act, s. 28

Workplace Safety and Insurance Act, 1997, Part XIII, s. 159

First Aid Requirements Regulation (O. Reg. 1101) under the Workplace Safety and Insurance Act, 1997



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## Company Policy

*Fire Safety*



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## Objective

This policy is designed to provide occupant safety in the event of a fire, to provide effective utilization of the fire safety features of the building or site, and to minimize the possibility of fires. This policy describes what occupants are to do in the event of a fire or other emergencies.

## Scope

This policy applies to all employees of MGI Construction Corp., general contractors, and owners involved in the construction or demolition process.

## Procedure

### *1. Schematic Drawings*

Fire safety schematic diagram(s) are designed to provide greater detail to the building's supervisory staff and firefighters regarding the fire safety features, provisions, and hazards for firefighting associated with the building.

Fire safety schematic diagram(s) will be created in accordance with the existing building's layout and provide a representational drawing of each floor area of the building and/or site. Symbols will be used on each diagram (e.g., fire alarm panel pull stations, portable fire extinguishers, exits, emergency lights, utility shutoffs, main electrical disconnect, location of the fire safety plan).

### *2. Exits*

Exits for partially occupied portions of the building must be maintained for the sole use of occupants of the building. The use of a separate, non-required exit for entrance and material movement will be used where applicable. At least one stairwell shall be maintained in useable condition at all times. This would include maintaining fire separation closures and keeping the area free of debris. Exit signs for restricted or closed exit doors and/ or stairwells must be displayed. Work taking place in an occupied portion of the building shall not be permitted to restrict any exit from the required exit width required by the National Building Code of Canada or National Fire Code (1,100 mm). Any construction that restricts the occupants exiting requirement shall be performed when the building is unoccupied. Stairwell and fire doors are to be kept closed at all times and maintained in working order.

### *3. Access for Fire Fighting*

Keep fire extinguishing equipment (e.g., hydrants, standpipe connection, hose cabinets, fire extinguishers and sprinkler heads) and fire routes accessible at all times. This also includes violation of minimum horizontal (not less than 5m) and overhead clearances (not less than 6m), erecting of barricades and digging of trenches. The site must maintain a

driveable road that provides access to fire fighting vehicles or other heavy emergency vehicles.

#### 4. *Emergency Lighting*

Alternate measures to be put in place to compensate for the disruption of exit or emergency lighting requirements (e.g., temporary lighting).

### Emergency Procedure

The following items should be acknowledged to comply with fire safety emergency procedures.

- Know the correct site location/building address
- Know the location and number of exits
- If smoke presents a hazard, it may be safer to try an alternate exit
- If you are trapped by smoke or fire, it may be safer to stay in your area; close the door and seal all openings against smoke
- Stay low to the floor if smoke enters the room
- Notify the supervisor if special assistance is required for disabled persons in the event of an emergency

### Communication

All incidents of fire or damage by fire must be reported to MGI Construction Corp. management. For emergency issues, contact 911 and follow the emergency response procedure.

### Training

Employees on-site must be familiar with and trained on the contents of any fire safety plan specific to the site and familiar with the emergency response procedure. Locations of and the operation of fire protection equipment must be communicated with employees.

### Responsibilities

#### *Owner/General Contractor*

- Establishment of emergency procedures to be followed at the time of an emergency.
- Appointment and organization of designated supervisory staff to carry out fire safety duties.
- Holding of fire drills where applicable.
- Control of fire hazards in the building.
- Maintenance of building facilities provided for the safety of the occupants.

- Provisions of alternate measures for the safety of occupants during the shutdown of fire protection equipment.
- Ensuring that checks, tests, and inspections of building fire protection equipment and devices, as required by the Fire Code, are completed on schedule and that records are retained.
- Ensuring that any person performing or supervising the annual tests or annual inspections on the fire alarm system has successfully completed a program or course acceptable to the Fire Marshal.
- Posting and maintaining a copy of the Fire Safety Plan on each floor area.
- Notification to the Chief Fire Official regarding changes in the Fire Safety Plan.
- Ensure the fire alarm has been activated and maintained; emergency voice communication systems should be used where available.

### *Supervisor*

- Acknowledge the approved Fire Safety Plan and the specific responsibilities of the personnel.
- Designate and train sufficient assistants to act in this position, during any absence from the building.
- Survey the building to determine the number of exits available from each floor or area.
- Ensure that a schematic diagram, showing type, location, and operation of all building fire emergency systems (e.g., location of fire alarm control panel, fire hose cabinets, water control valves) is maintained and accessible.
- Notify the Fire Department as often as necessary of any changes of persons requiring assistance and their location.
- Supervise the evacuations of occupants (e.g., headcounts).
- See that the fire alarm system is not silenced until the Fire Department has responded and the cause of the alarm has been investigated.

### *Worker*

- Notify the Fire Department of the emergency condition.
- Upon the arrival of firefighters, inform the Fire Officer regarding conditions in the building and coordinate the efforts of supervisory staff with those of the Fire Department.
- Provide access and vital information to firefighters (e.g. master keys for suites, service rooms, elevators).
- Maintain the fire alarm system and other fire protection equipment in good operating condition at all times.
- In the event of any shutdown of fire protection equipment, notify the Fire Department and a fire safety watch shall be conducted.
- Arrange for a substitute in your absence.
- Participate in fire drills
- Be familiar with the Ontario Fire Code.

- Make fire safety procedures available to occupants that apply to them.

## References

- The Fire Protection and Prevention Act 1997
- Ontario Fire Code
- National Building Code of Canada 2015
- National Fire Protection Association (NFPA) – Fire Protection Handbook





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January 30, 2024



**Company Policy**  
*Joint Health & Safety Committee*

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## Objective

This term of reference provides the basic guidelines necessary to have an effective Joint Health & Safety Committee (JHSC) at MGI Construction Corp. The Occupational Health and Safety Act is built upon the principle that workers and the employer work together to ensure that the working environment is safe and that provincial standards are met. This is achieved with the assistance of the Joint Health & Safety Committee member representatives.

This term of reference defines the purpose, role, powers, and responsibilities of the committee and ensures that the Joint Health & Safety Committee is functioning with a clear mandate to implement the principle of shared responsibilities of management and workers.

## Scope

This procedure applies to MGI's Joint Health & Safety Committee.

## Definitions

*Workplace:* refers to any land, premises, location or thing at, upon, in, or near which a worker works.

*Regularly employed:* a worker who is filling a position at the workplace for more than or (or expected to exceed) three months.

## Procedure

The JHSC shall ensure that all health, safety, and the environment (HSE) concerns are brought forward and revisited until they have been resolved. The JHSC will meet quarterly to discuss issues including, but not limited to:

- First-aid records
- Accident investigation reports
- Job hazard reports
- Monthly inspection reports
- Meeting minutes (JHSC, Management)
- Training records
- Progressive discipline
- Ministry of Labour (MOL) orders

The specific details of the JHSC are the following:

### *1. Purpose and Mission of the JHSC*

The primary purpose and mission of the JHSC is to monitor, assist, and support the Internal Responsibility System (IRS). This is best accomplished when the JHSC fulfills its essential role of identifying weaknesses in the company's IRS and recommends solutions that enable all parties to understand, accept, and carry out their individual and collective responsibilities for HSE. The JHSC will endeavour to make recommendations that establish, implement, monitor, evaluate, and improve company policies, programs, and procedures. An effective JHSC ensures that any weaknesses in the company's chain of internal responsibility are identified and that the attention remains focused on these weaknesses until they are addressed and resolved.

### *2. Selection of JHSC Member and Co-Chairs*

Worker representatives on the JHSC are to be selected by the workers who do not exercise managerial functions. The employer shall select the remaining members of a committee from persons who exercise managerial functions for the employer. Two members of the committee will co-chair the committee, one of whom will be selected by the members who represent workers and the other of whom will be selected by the members who exercise managerial function.

### *3. Structure of the JHSC*

The company will have a committee with at least one management member and one worker member.

The JHSC shall consist of a minimum of two certified members: one member who does not exercise managerial functions and one member who does exercise managerial functions. The term of the serving certified member will be a minimum of two years. Alternatives may be allowed, however, they shall only be used in emergency conditions and with the approval of the co-chairs. Each party will supply a list of one alternative.

The project sites with 50 or more workers and lasting 3 months or more shall consist of a minimum of two certified members: one worker representative and one management representative.

The JHSC shall meet every quarter on a specific date and time decided upon by the JHSC.

A co-chair may, with the consent of his/her counterpart, invite any additional person(s) to attend the meeting to provide additional information and comments. However, this individual(s) shall not participate in the regular business of the meeting unless asked to do so.

If a certified member resigns, steps shall be taken to ensure that the requirement for a newly certified member is met.

The certified member may bilaterally order the company to stop work if they agree that the work being performed is dangerous as defined in the Occupational Health and Safety Act Section 44(1).

A list of JHSC members will be posted in a conspicuous location in the workplace. This list will be updated as required.

#### *4. Functions of the JHSC*

Under the Occupational Health and Safety Act, the JHSC functions are as follows:

- To conduct meetings according to an established schedule.
- To conduct monthly workplace inspections.
- To receive and review all incident, inspection, and health and safety audit reports and to make recommendations as necessary.
- To receive and review all health and safety-related test results and to make recommendations as necessary.
- To operate on the principle of consensus-building when reaching decisions.
- To make written recommendations to the employer as necessary.
- To have members accompany accredited safety representatives or inspectors (e.g., MOL) as required.
- To investigate incidents, injuries, or occupational illnesses as required.
- To report findings of investigations to the MOL and management as required.
- To assist and promote the development of company HSE policies, programs, procedures and best practices.
- To obtain information from the employer regarding potential or actual workplace hazards.
- To obtain information from the employer regarding statistics, trends, records, processes or any other information that may help it to fulfill its mandate.
- To always work in compliance with legislation, company HSE policies, programs, procedures and industry best practices.
- To assist in hazard assessment of new or modified facilities, processes, procedures, equipment, devices and materials.
- To monitor the effectiveness of the Internal Responsibility System and its effectiveness on an ongoing basis through various auditing programs.
- To encourage adequate education and training programs with the objective that all employees are knowledgeable in their rights, restrictions, responsibilities, and duties under the Occupational Health and Safety Act.
- To evaluate all newly introduced potential hazards (e.g., machinery, chemicals) and communicate the hazard potentials to respective management, before their use.
- To develop and implement training programs for all newly introduced hazards and participate in the development and delivery of HSE training programs in conjunction with management.

- To be present during an occupational hygiene testing if required at the workplace.
- To advise in the selection of personal protective equipment.
- To address matters related to Designated Substances Regulations and WHMIS where applicable.
- To address any workplace harassment incident if it is brought to the committee.
- To review terms of reference at least annually or sooner if required.
- To carry out any other duties and functions as prescribed by the legislation.

#### 5. *Quorum*

Both co-chairs should be present at every meeting and the number of management representatives must not be more than the number of worker representatives.

#### 6. *Health and Safety Meetings*

JHSC meetings are to be held at least quarterly on a specific date and time, which will be decided as a committee. Records of the recent meeting will be made available to workers.

Meetings shall address many issues including the analysis of first aid or training records, accident investigation reports, job hazard reports, areas of improvement or concern, or newly enacted legislation. Also, meetings may include the review of minutes of the last JHSC meeting, applicable hygiene surveys, toolbox talks, progressive discipline, repeat items.

#### 7. *Meeting Minutes*

A designated scribe will be responsible for having the meeting minutes typed, filed, and made accessible within 5 working days of the meeting. The scribe will use a standard template to keep track and will be reviewed and edited, where necessary, by the co-chairs. The persons present at the meeting will be noted.

#### 8. *Payment of Attending Meetings*

Time spent in attendance at committee meetings or in activities relating to the function of the committee will be paid for at the members' current rate of pay for performing work, and the time spent shall be considered as time at work.

#### 9. *Meeting Agenda*

The co-chair will prepare an agenda and will forward a copy of the agenda to all committee members before the meeting. The committee may accept any item as proper for discussion and resolution about HSE. When preparing the agenda, consider the following:

- Date, time and location of the meeting
- The items under consideration will receive attention

- Efforts will be made to keep the meeting on schedule in accordance with the agenda
- Deferred items or business outstanding will be carried forward
- Members will have the opportunity to study the items before the meeting
- Members who wish to have items added to the agenda should make such request to the co-chairs

All items raised from the agenda in meetings will be dealt with based on consensus rather than voting. If the committee has failed to reach a consensus about making recommendations to the employer after trying to reach a consensus in good faith to do so, either co-chair of the committee has the power to make written recommendations to the employer. All items will be reported in the minutes. Unresolved items will be recorded and placed on the agenda for the next meeting.

#### *10. Workplace Inspection*

The JHSC will inspect the workplace once a month on a rotation schedule. Each inspection must be done by a minimum of one worker and management member.

#### *11. Further Training for all JHSC Members*

In addition to the legislated requirement that at least one worker member and one management member of the JHSC receive certification training, all JHSC members are requested to take the following training that pertains to their legislated responsibilities:

- Incident Investigation
- Workplace Inspection
- Emergency Response
- Occupational Health and Safety Responsibilities
- Hazard Analysis

#### *12. Confidentiality of Information*

JHSC members are required by the Occupational Health and Safety Act to keep any personal medical details or other sensitive information they receive confidentially. This means paying strict attention to the security of committee records. For the committee to function properly, all parties must be confident and trust that no improper use will be made of the information received.

#### *13. Responding to Unsafe Conditions or Practices*

One of the most important legislated functions of the JHSC is to develop recommendations to control hazards or address safety concerns at the workplace. Certified members of the JHSC have the authority to investigate and act upon dangerous circumstances that require immediate attention. Individual committee members may identify hazards during monthly inspections, incident investigations, or through daily

worker contacts. However, because committee members are workers under the legislation, they first have a legal duty to report any hazards or contravention they become aware of to their supervisor.

#### *14. Incident Investigation*

All accidents, injuries, or incidents will be reviewed and discussed by the committee during the regular quarterly meeting to explore if anything can be done to prevent any similar occurrences in the future.

In the event of a critical injury, one of the designated members of the committee along with a member of senior management shall investigate the incident.

*Critical injury:* for the Act and Regulations, "critically injured" means an injury of a serious nature that:

- Places life in jeopardy
- Produces unconsciousness
- Results in substantial loss of blood
- Involves the fracture of a leg, arm, or fingers, or toes
- Involves the amputation of a leg, arm, hand, foot, or fingers or toes
- Consists of burns to a major portion of the body
- Causes the loss of sight to an eye

#### *15. Accompaniment*

The committee will designate certified worker members to accompany a Ministry of Labour inspector while carrying out a Ministry inspection of the workplace.

#### *16. Work Refusals*

In the event of a work refusal, the designated certified worker member will investigate if possible. Refer to the work refusal policy and program for further details.

#### *17. Formal Written Recommendations*

The JHSC will be required to submit formal written recommendations to control hazards at the workplace. Recommendations can be based on the following:

- Workplace inspections
- Observations
- Discussions
- Review of training programs
- Worker request or concerns

When developing recommendations, the committee must document them under the following criteria:

- Definition of hazard
- Accompanying information
  - Description of the process and workplace layout
  - History/details of previous accident and investigations
  - Comments and suggestions from supervisors and workers in the area concerned
  - Maintenance schedules and manufacturers specifications
- Consideration of possible solutions
  - The actual and potential seriousness of the problem
  - The range of possible solutions
  - The practicality of the solution being recommended

When submitting recommendations, the committee must meet the following criteria:

- Submitted by either co-chair of the committee upon final agreement by the committee
- Submitted to senior management
- Submitted within one week of the JHSC meeting at which the recommendation was decided upon.

Senior management has to send written communication directly to the co-chairs within 21 days in response to the recommendations of the committee. This can be done by giving an assessment of the problem(s) and outlining who is responsible for resolving the matter, along with a timeframe in which the matter will be resolved.

#### *18. General*

All workers will be encouraged to discuss any problem(s) they have with their supervisor before bringing it to the attention of the committee.

Committee members will thoroughly investigate all complaints to get all the facts and will exchange these facts when searching for a resolution of the problem. All problem resolutions will be reported in the minutes.

Medical or trade secret information will be kept confidential by all committee members.

## 19. Amendments to these Guidelines

Any amendments, deletions or additions to these guidelines must have the consensus of the total committee and shall be set out in writing and attached as an appendix to these guidelines.

### Responsibilities

#### *Senior Management*

- Providing assistance and co-operation where necessary to the committee to carry out its role.
- Respond to written recommendations to the committee within 21 days. The response must include corrective action time and dates, or reasons for disagreement of recommendations.
- Conducting a minimum of one workplace inspection annually.

#### *Supervisors*

- All supervisors, who are not committee members, shall attend at least one JHSC meeting per year and at least one JHSC inspection per year.
- Set an example by being consistently safety conscious and insisting on the safe performance of work.
- Observe the work in progress and provide positive input to the workers.
- Involved in ongoing hazard assessment.
- Participate in the development and review of safe work practices and procedures.
- Take every precaution reasonable in the circumstances for the protection of a worker.

#### *Workers*

- All workers shall cooperate with the committee members while they perform their JHSC duties.
- All workers shall comply with this standard, procedures, and legislative requirements.
- Report all accidents, injuries, first aid and near-misses immediately to the supervisor.
- Advise other workers of unsafe conditions or work practices.
- Participate in solving HSE problems.
- Provide recommendations to the supervisor to improve HSE.

#### *Joint Health & Safety Committee (JHSC)*

- All JHSC members shall perform duties as legislated. All JHSC members shall comply with these standards, procedures and legislative requirements.

## References

Duties of employers – Occupational Health and Safety Act, s. 25, 26

Duties of constructors – Occupational Health and Safety Act, s. 23

Duties of supervisors – Occupational Health and Safety Act, s. 27

Duties of workers – Occupational Health and Safety Act, s. 28

Health and Safety Representative – Occupational Health and Safety Act, s. 8

Joint Health and Safety Committee – Occupational Health and Safety Act, s. 9

Worker Trades Committee – Occupational Health and Safety Act, s. 10





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**Company Policy**  
*Health & Safety Representative*



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## Objective

To outline the requirements and responsibilities with regards to Health & Safety Representative(s).

## Scope

This procedure applies to all employees on-site at MGI Construction Corp., especially the workers who will be taking the role of the Health & Safety Representative.

## Selection

On sites with 6-19 employees, a Health & Safety Representative is required. The Health & Safety Representative must be selected by the workers on-site and must be a worker themselves.

## Responsibilities

The following are the basic responsibilities of the Health & Safety Representative:

- Conduct monthly site inspections
- Make recommendations to their supervisor/management
- Assist the site supervisor in accident/incident investigations
- Act as a representative of the company workers on site, with regards to health, safety, and the environment

## References

Health and Safety Representative – Occupational Health and Safety Act, s. 8



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**Company Policy**  
*Worker Trades Committee*



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## Objective

To outline the requirements and responsibilities concerning the worker trades committee. The Joint Health & Safety Committee (JHSC) shall establish a worker trades committee to assist it on all projects where the number regularly employed exceeds forty-nine (49) and where the duration of the project is expected to exceed three (3) months.

## Scope

This procedure applies to all employees on-site at MGI Construction Corp., specifically all trades included on the site project.

## Procedure

### *1. Structure of the Worker Trades Committee*

The worker trade committee shall consist of at least one worker representative from each trade on the project, as required in the Occupational Health and Safety Act, s. 10. The representatives must be selected by the workers in the trades they represent or, if a trade union represents the workers in the trades, by the trade union.

A chairperson should be chosen from among the worker trades committee members by the members. It is recommended that the chairperson be a member of the JHSC to maintain good communication between both committees.

The names, trades and employers of the worker trades committee members should be made available at a designated location(s) determined by the JHSC.

Members chosen to be a part of the worker trades committee should have the expertise and good technical knowledge of the trades in which they are from.

*Note:* trade does not mean “union”.

### *2. Frequency of Worker Trades Committee Meetings*

The worker trades committee should meet in conjunction with the JHSC. When practical, the worker trades committee should meet immediately before regular JHSC meetings so issues addressed in the meeting can be communicated to the JHSC without delay.

Meetings should be held at a designated place on the site/project.

### *3. Meeting Documentation*

There is no formal agenda or minutes required for worker trades committee meetings. Issues raised at the meeting should, however, be documented in writing for the JHSC and should be included with JHSC minutes.

All items raised should be dealt with based on consensus and not formal motions.

#### *4. Functions of the Worker Trades Committee*

The committee as both a whole and concerning individual committee members shall:

- Assist the JHSC in dealing with trade-specific concerns regarding health and safety, and the environment (HSE).
- Identify the JHSC of any HSE problem(s) involving the trades represented.
- Assist certified JHSC members in dealing with trade-specific dangerous circumstances when requested.
- Assist certified JHSC members in dealing with trades-specific work refusals when requested.
- Liaise with the trade workers they represent regarding HSE problems.
- Assist, upon request, in incident investigations by members of the JHSC.

#### *5. Reporting Procedures*

Any individual on-site who discovers an HSE problem should immediately correct the problem if it poses an immediate danger to the health and safety of any worker and then report the problem to the project supervisor.

The project supervisor shall take the action necessary to correct the safety-related problem and/or inform the constructor's supervisor if assistance or direction is required.

The constructor shall in turn report back to the JHSC regarding the informed safety-related problem.

*Note:* All employees should discuss any occupational health and safety concerns with their supervisor before raising it with the worker trades committee representative or a member of the JHSC.

#### *6. Compensation*

Committee members shall be compensated their current rate of pay by the member's employer during preparation before the meeting and during committee meetings.

### Responsibilities

#### *Supervisors*

- Respond to worker trades committee recommendations and concerns regarding HSE.
- Set an example by being consistently safety conscious and insisting on the safe performance of work.
- Observe the work in progress and provide positive input to the workers.

- Involve in ongoing hazard assessment.
- Take every precaution reasonable in the circumstances for the protection of a worker.

#### *Workers*

- All workers shall cooperate with the committee members while they perform their worker trades committee duties.
- All workers shall comply with this standard, procedures and legislative requirements.
- Report all accidents, injuries, first aid and near-misses to their supervisor.
- Provide recommendations to the supervisor to improve HSE.

#### *Joint Health & Safety Committee*

- Respond to worker trades committee recommendations and concerns regarding HSE.
- Perform JHSC duties in compliance with the legislation, standards, and procedures.

#### *Worker Trades Committee*

- All worker trades committee members shall perform duties as legislated. All worker trades committee members shall comply with these standards, procedures and legislative requirements.

#### *References*

Duties of employers – Occupational Health and Safety Act, s. 25, 26

Duties of constructors – Occupational Health and Safety Act, s. 23

Duties of supervisors – Occupational Health and Safety Act, s. 27

Duties of workers – Occupational Health and Safety Act, s. 28

Joint Health and Safety Committee – Occupational Health and Safety Act, s. 9

Worker Trades Committee – Occupational Health and Safety Act, s. 10



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## Company Policy

*Job Roles & Responsibilities*



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## Objective

MGI Construction Corp. is committed to ensuring that all workplace parties including senior management, middle management, supervisors, workers, and subcontractors understand and comply with the legislative requirements under the Occupational Health and Safety Act, applicable regulations and relevant company policies and procedures.

## Scope

The following responsibilities apply to all workplace parties of the company. It also applies to but is not limited to visitors, clients, contractors, vendors, or members of the public.

## Definitions

*Senior Management* (e.g., President, Vice President, Strategist) is defined as a group of managers at the highest level of the company or organization.

*Middle Management* (e.g., Project Manager, Office Manager, H&S Manager) is defined as a group of managers who administers and/or supervises the affairs of a department or division at the level below senior management of the company or organization.

*Project Superintendent* (e.g., Supervisor, Superintendent) is defined as a competent person who is in charge of a workplace or has authority over a worker(s) during their day-to-day work.

*Worker* (e.g., Employee, Co-op Students) is defined as a competent individual, who performs work or supplies services for monetary/non-monetary compensation. Workers do not have management or supervisory responsibilities.

*Joint Health & Safety Committee (JHSC)* is composed of workers and management representatives. Together, they are mutually committed to improving health and safety conditions in the workplace.

*Health & Safety Representative* is required in workplaces with 6-19 workers.

*Competent person* means a person who:

- is qualified because of knowledge, training, and experience to organize the work and its performance,
- is familiar with this Occupational Health and Safety Act and the regulations that apply to the work, and
- knows any potential or actual danger to health or safety in the workplace.

*Competent worker* in relation to specific work means a worker who:

- is qualified because of knowledge, training, and experience to perform the work,
- is familiar with the Occupational Health and Safety Act and with the provisions of the regulations that apply to the work, and
- has knowledge of all potential or actual danger to health or safety in the workplace.

*Worker Trades Committee* is a committee established by a Joint Health & Safety Committee at a construction project that is expected to last more than three months and at which more than 50 workers are regularly employed.

## Responsibilities

### *Senior Management*

- Provide a safe and healthy work environment.
- Ensure that equipment, materials and protective devices provided are maintained in good working condition.
- Provide information, instruction, and supervision to workers to protect their health and safety.
- Appoint competent personnel as supervisors.
- Make sure supervisors and workers are aware and informed of potential or actual hazards.
- Assist the Joint Health & Safety Committee or Health & Safety Representative (if applicable) to carry out their functions.
- Prepare and at least annually review a written occupational health and safety policy. Post the policy in a conspicuous place.
- Develop and maintain a program to implement the policy.
- Work jointly with relevant workplace parties in the development and implementation of the program.
- Afford assistance and co-operation to the Joint Health & Safety Committee and or Health & Safety Representative in carrying out any of their functions.
- Support the process of ongoing hazard assessment.
- Participate in the development and review of practices and procedures.
- Promote the exchange of health and safety information.
- Delegate authority and responsibility as appropriate and hold employees and subcontractors accountable for the authority and responsibility delegated to them.
- Ensure an investigation is conducted for fatalities or critical injuries. Investigate if a person is killed or critically injured.
- Review accident reports and respond promptly.
- Review health and safety trends and develop yearly action plans based on the trends.
- Conduct a formal inspection of a site at least once a year.
- Take every precaution reasonable in the circumstances for the protection of a worker.

### *Middle Management*

- Ensure that supervisors understand their health and safety responsibilities and are held accountable.
- Ensure that equipment, materials and protective devices provided are maintained in good working condition.
- Ensure the workforce is adequately trained to safely complete the work and deal with hazards.
- Ensure that training is current and regularly reviewed.
- Be aware of applicable legislation and ensure compliance.
- Support the process of ongoing hazard assessment.
- Participate in the development and review of practices and procedures.
- Ensure there is an effective mechanism for co-operative problem solving amongst workers and supervisors.
- Take unresolved health and safety problems to senior management as required.
- Respond appropriately to reports of problems and to the Joint Health & Safety Committee or Health & Safety Representative(s) recommendations.
- Ensure practices and procedures are established so that supervisors can maintain a safe and healthy workplace.
- Participate in the development, implementation, and review of MGI's health, safety, and the environment (HSE) program.
- Monitor supervisor's toolbox talks as required.
- Review accident/incident reports.
- Ensure corrective actions are implemented and effective.
- Conduct a formal inspection of a job site once a month.
- Report quarterly to senior management on the status of health and safety performance.
- Delegate authority and responsibility as appropriate and hold supervisors, workers, and subcontractors accountable for the authority and responsibility delegated to them.

### *Supervisor*

- Be aware of the applicable legislation and company procedures.
- Ensure that workers use or wear the equipment, protective devices or clothing that the company requires to be used or worn and that it is in good condition.
- Ensure that workers receive appropriate training to use or wear the equipment, protective devices or clothing that the company requires.
- Report serious or near-miss incidents to management promptly.
- Establish and maintain procedures and practices to ensure that workers can carry out safe and healthy work.
- Ensure that workers comply with the Occupational Health and Safety Act, applicable regulations and the company's policy and program.
- Ensure that workers are aware of potential or actual hazards and have dealt with or are dealing with the actual hazards in the workplace.

- Plan and communicate clear and precise work assignments to enable workers to produce safely.
- If possible, involve workers in work planning and problem-solving.
- Provide orientation to new crew members.
- Conduct weekly toolbox talks and weekly site inspections.
- Review the safety aspects of each task with the crew.
- Conduct accident or incident investigation as soon as possible.
- Encourage workers to report health and safety issues or concerns.
- Respond quickly and appropriately to worker concerns and if possible, cooperate in their correction. Take the matter to a higher level if beyond the supervisor's authority/ability.
- Report safety problems to middle management.
- Set an example by being consistently safety conscious and insisting on the safe performance of work.
- Observe the work in progress and provide positive input to the workers.
- Involve in ongoing hazard assessment.
- Ensure all required first aid supplies and equipment are available on the project.
- Participate in the development and review of safe work practices and procedures.
- Ensure project-specific emergency management planning is conducted, documented and communicated to all workers on the project.
- Implement MGI's policy on substance use (e.g., alcohol, cannabis).
- Apply progressive disciplinary measures to any individuals who demonstrate an unwillingness to comply with company policies, rules, standards and/or regulations.
- Take every precaution reasonable in the circumstances for the protection of a worker.

#### *Worker*

- Work in a way that will not endanger yourself or others.
- Report to work fit for duty, free of impairment by drugs, alcohol, fatigue or other, related, influencing factors.
- Use or wear the equipment, protective devices, or clothing that the legislation or company requires.
- Do not perform any task for which you are not competent.
- Work safely in accordance with the company's or the client's health and safety policy and program and with the Occupational Health and Safety Act and applicable regulations.
- Complete pre-use inspections for equipment as required.
- Do not remove, displace or interfere with the use of any safeguards.
- Immediately report unsafe conditions and/or the existence of any hazard to the supervisor.
- Report all accidents, injuries, first aid, and near-misses immediately to the supervisor.
- Advise other workers of unsafe conditions or work practices.

- Participate in solving health and safety issues and concerns.
- Provide recommendations to the supervisor to improve health and safety.

### *Subcontractor*

- Comply with all MGI Construction Corp. policy, including standards, project rules, the project-specific safety programs, as well as applicable local government regulations and legislation.
- Ensure all their employees are aware of applicable MGI Construction Corp. policy, including standards, project rules, the project-specific safety programs, as well as applicable local government regulations and legislation.
- Provide experienced and qualified supervision on all MGI projects.
- Ensure all their employees attend the MGI Construction Corp. project safety orientation prior to beginning work on the project.
- Ensure all their employees are qualified through appropriate competency-based job training; or, ensuring new or young workers are directly supervised by a competent person.
- Communicate any issues that do not comply with MGI Construction Corp. policy or regulatory requirements to MGI's Project Superintendent or similar.
- Cooperate with MGI Construction Corp. Project Superintendent or similar in all matters relating to company policy.
- Before commencing work, ensure compliance with MGI Construction Corp. policy and make it clear to employees that failure to do so could result in termination of the contract.
- Provide all legislated on-site training in good order (i.e., valid) and in due time.
- Inspect, and maintain personal protective equipment (PPE) as required for direct-hire employees.
- Monitor site conditions daily and record all injuries, accidents, or near-misses.
- Conduct formal inspections at regular intervals to prevent the potential development of unsafe conditions.
- Ensure their employees are fit for duty, free of impairment and immediately removing any employee from the workplace who is reasonably suspected of being impaired.
- Provide copies of all related health, safety, and the environment documents, e.g., incident investigations, safety inspections, toolbox meetings.
- Ensure weekly safety meetings are held with all employees and a record of the safety topic and attendance is submitted to the MGI Project Superintendent or similar.
- Participate in all MGI project-specific HSE initiatives.
- Conduct clean-up of work areas at least daily, based on the contract.
- Conduct regular safety talks for employees and provide site-specific training as required.
- Provide adequate facilities (e.g. lunch area, wash-up area and toilets, tool storage, and first aid) for employees.

- Notify supervisor of any lost-time injuries, medical aid cases, and reportable occurrences on the project.
- Cooperate in accident investigations.

#### *Supplier*

- Report directly to MGI's site office, prior to accessing the site.
- Ensure all equipment or material supplied to an MGI Construction Corp. workplace meets or exceeds the applicable manufacturer's specifications, regulations, and codes.
- Provide instruction for the safe use of any tool, equipment or machine supplied to an MGI Construction Corp. workplace.
- Ensure all controlled products supplied to MGI Construction Corp. work sites are accompanied by a corresponding Safety Data Sheet (SDS) and other documentation as required by Workplace Hazardous Material Information System (WHMIS) regulations.

#### *Visitor*

- Report to the MGI Construction Corp. site office to sign in prior to accessing the site.
- Attend MGI Construction Corp. project safety orientation, if determined appropriate by MGI project management (a short version of the orientation may be offered to visitors if they are accompanied by a person on the project who has attended the full orientation).
- Comply with the MGI Construction Corp. HSE Program requirements at all times.

#### *Joint Health & Safety Committee (JHSC)*

- Meet at least once every three months.
- Conduct a monthly inspection of the workplace to identify hazards (worker member responsibility).
- Report findings to the committee and make written recommendations to senior management.
- Support the implementation and maintenance of the company health and safety program.
- Ensure all required first aid supplies and equipment are available on the project.
- Assist senior management in the annual review of the company health and safety program.
- Review inspection and accident/incident reports.
- Worker members investigate cases where a worker is critically injured or killed.

### *Health & Safety Representative*

- Required when there are between 6 and 19 workers regularly employed at a workplace (only applicable to construction projects where the number of workers regularly exceeds five).
- Inspect the workplace monthly to identify hazards.
- Report hazards and make written recommendations to a supervisor.
- Attend and participate in health and safety meetings on site.
- Assist in the review of the health and safety program for the project.
- Help to implement the health and safety program.
- Assist in accident/incident investigation.
- Inspect the workplace if a person is killed or critically injured.

### *First Aid Attendant*

- Maintain appropriate first aid certification to comply with local government requirements.
- Maintain accurate first aid injury treatment records.
- Take all reasonable measures to protect the privacy of all persons treated for first aid.
- Establish an effective communication system with local physicians, ambulance services and medical care facilities.
- Coordinate the transportation of any project personnel requiring medical aid to the appropriate medical care facility.
- Provide health education materials and training to on-site workers, as required.

### *Worker Trades Committee*

- Only applicable to construction projects on which 20 or more workers are regularly employed and expected to last three months or more.
- Report health and safety problems to the joint health and safety committee.
- Assist in resolving disputes and problems related to health and safety.
- Attend health and safety meetings.

### *References*

- Duties of employers – Occupational Health and Safety Act, s. 25, 26
- Duties of constructors – Occupational Health and Safety Act, s. 23
- Duties of supervisors – Occupational Health and Safety Act, s. 27
- Duties of workers– Occupational Health and Safety Act, s. 28
- Health and Safety Representative– Occupational Health and Safety Act, s. 8
- Joint Health and Safety Committee– Occupational Health and Safety Act, s. 9
- Worker Trades Committee – Occupational Health and Safety Act, s. 10
- Duties of Project Owners - Occupational Health and Safety Act, s. 30

- Duties of suppliers - Occupational Health and Safety Act, s. 31
- Duties of Directors and Officers of a Corporation - Occupational Health and Safety Act, s. 32





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January 11, 2024



**Company Policy**  
*Hazard Assessment, Analysis, & Control*

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## Objective

MGI Construction Corp. is committed to identifying and controlling potential or actual hazards through assessment, analysis and control implementation.

## Scope

This procedure applies to all employees at MGI Construction Corp.

*Note:* Hazard analyses for routine tasks performed by employees can be found in the *Job Hazard Analysis (JHA)* folder in Dropbox.

## Definitions

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

*Risk:* a risk is the combination of the likelihood of the occurrence of the harm and the severity of it.

*Hazard Analysis:* the process of conducting a systematic review of work activities to identify the hazards, analyze the risks associated with the hazards, and determine appropriate ways to eliminate or control the hazards.

*Task:* an activity performed to fulfill a job.

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

*Ongoing Hazard Assessment* (e.g., PSA, FLHA, JSA, DHA): the process of conducting daily hazard assessments to address ever-changing site activities and conditions.

*Competent worker:* has training, experience, knowledge and understanding of the work being done, possess a certificate of qualification, specific manufacturers training, or years of experience in the industry, is familiar with the Occupation Health & Safety Act and has knowledge about the potential or actual hazards for health and safety of the job.

## Procedure

A Job Hazard Analysis has been conducted for all operations and activities. This can be found in the *Job Hazard Analysis (JHA)* folder in Dropbox. When a new task is introduced to the workplace or an existing task must be modified, a job hazard analysis must be conducted. This includes modifications to equipment, materials, or substances. Only competent employees are eligible to conduct a hazard assessment, analysis, and control procedure. This can include supervisors, workers, engineers, and suppliers. All capable persons affected should be involved in the hazard assessment process.

The following steps are to be followed to complete a Job Hazard Analysis for that task:

1. *Breakdown of Task into Sequential Steps*

Identify the steps required to complete the task.

2. *Identify Hazards Associated with Each Step*

All potential hazards must be identified at each step. This includes potential hazards originating outside of the workplace that can be managed. This can be done based on the knowledge of the job, knowledge of previous accidents/incidents causes, and personal experience. When identifying potential hazards, it is recommended to include workers in the hazard identification process and inquire about their personal experience and knowledge of the job. Along with a hazard description, types of hazards must be identified.

The types of hazards are as follows:

- *Physical:* Noise, vibration, electricity, heat and cold, UV exposure, pressure, and radiation.
- *Chemical:* Gases, vapours, liquids, solids, plasma, dust, fume or mist.
- *Biological:* Living organisms such as bacteria, viruses, mould, parasites and fungi, bird/bat dropping, human waste or poisonous insects/plants.
- *Musculoskeletal:* Poorly designed equipment or work processes which place undue strain on the body by repetitive or strenuous activity.
- *Psychosocial:* Risks of crime and violence and/or harassment in the workplace; production pressures that can influence the pace of work.
- *Safety:* Housekeeping, falls, pinch points, sharp points/edges, moving machinery, dropping items, pressure systems, fires, and explosions.

1. *Conduct a Risk Analysis for Each Hazard*

The level of risk must be identified for all hazards, by determining the probability and severity of the injury/illness.

*Severity* is the amount of damage or harm a hazard could create and is ranked on a four-point scale as follows:

- *Severe injury/death (4):* the hazard could cause fatal or serious injury, illness and/or damage, resulting in permanent or long-term disability and/or significant loss.
- *Critical injury/lost time injury (3):* the hazard could cause moderate injury, illness and/or property damage resulting in lost time.
- *Minor injury (2):* the hazard could cause minor injury or illness without lost time or other loss.

- *Extremely minor injury (1)*: the hazard could cause less than a minor injury or illness.

*Probability* is the likelihood of the hazard causing an injury or illness, and is ranked on a four-point scale as follows:

- *Frequent (4)*: injury or illness due to exposure to this hazard is frequent.
- *Likely (3)*: injury or illness due to exposure to this hazard is very likely.
- *Occasionally (2)*: there is a chance that the hazard will cause injury or illness.
- *Unlikely (1)*: the hazard will probably not cause injury or illness.

The risk matrix table is used to assess the risks of hazards by multiplying the scores for the probability and severity values together:

		<b>Probability</b> (How likely is the incident to occur?)				
		Frequent	Likely	Occasionally	Unlikely	
<b>Severity</b>	If the incident occurs, how serious?	4	3	2	1	
	Severe injury/death	4	16	12	8	4
	Critical/lost time injury	3	12	9	6	3
	Minor – first aid/medical treatment	2	8	6	4	2
	Extremely minor	1	4	3	2	1

Risks	Colour Code	Value	Action Needed
High risk	Red	12 and above	Immediate action needed
Moderate risk	Yellow	6-9	Some action needed
Low risk	Green	4 and less	No changes or minimum changes needed

MGI Construction Corp. has defined their risk threshold level to be any task with a hazard risk of 12 or above. These tasks are considered critical tasks and require the development of a safe job procedure. A complete list of critical tasks can be found in the Job Hazard Analysis.

## 2. Identify Preventative Controls for Each Hazard

The hierarchy of controls is used to identify controls for each hazard. They are as follows:

- *Elimination*: Remove the hazard from the workplace.
- *Substitution*: Replace hazardous materials or equipment with less hazardous ones.
- *Engineering Controls*: Includes designs or modifications to equipment and processes that reduce the source of exposure.
- *Administrative Controls*: Controls that alter the way the work is done, including the timing of work, policies and other rules, and work practices such as standards and operating procedures (including training, housekeeping, and equipment maintenance, and personal hygiene practices).

- *Personal Protective Equipment:* Equipment worn by individuals to reduce exposure such as contact with chemicals or exposure to noise. This is the least effective means of controlling a hazard.

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

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

Upon identification of a hazard, any controls, safe work practices and safe job procedures required must be implemented in a timely manner. Changes should consider applicable legal requirements, manufacturer guidelines and Occupational Health and Safety Act standards.

### 3. *Communication of Job Hazard Analysis*

Workers will review all job hazard analyses that apply to their job or line of work. The job hazard analysis must be reviewed and acknowledged by the workers to indicate that they understand their hazard exposures and controls. Workers who perform the job must ensure that all the basic steps of the task have been noted, are in the correct order, have suitable controls and are documented. If the worker does not agree with the analysis, they must inform their supervisor. The supervisor must review the worker's concern, update the analysis if required, and communicate this information to the workers. Supervisors must ensure that workers follow the control measures specified in the job hazard analysis.

### 4. *Validation and Evaluation*

Supervisors must monitor implemented controls for effectiveness. This can be in the form of obtaining feedback from workers. Job hazard analysis feedback, in conjunction with the job hazard analysis literature as such, are to be used to perform any new Job Hazard Analysis. The Job Hazard Analysis will be reviewed and modified after investigations, when phase of projects change or at least annually by management.

## Factors to Consider

The development or review of a Job Hazard Analysis must be performed for the following additional factors:

- *Accident frequency and severity*: jobs where accidents occur frequently or where they occur infrequently but result in severe injuries.
- *Potential for severe injuries and illnesses*: consequences of an accident, hazardous condition, or exposure to harmful substances are potentially severe.
- *Newly established jobs*: hazards are unknown due to the lack of experience with the job
- *Modified jobs*: new hazards may exist with changes in job procedures.
- *Infrequently performed jobs*: a job hazard analysis is required prior to non-routine work being performed.
- *Changes to health and safety processes and procedures*: a job hazard analysis is required after a change is made.
- *Other things to consider are*:
  - human factors: forgetfulness, unintentional mistakes, poor judgement, or decision making, fatigue, stress, distraction can impact health and safety on the job and should have appropriate controls in place to mitigate error on the job.
  - Design and layout of the work area, machinery, and ergonomics

## Ongoing Hazard Assessment

A daily pre-job safety assessment will be conducted by the site supervisor prior to any work being performed on-site. This process is used to identify potential hazards specific to the work that is being performed on that day. Documentation will be filled out by site supervisors and reviewed and signed by the workers. The site supervisor will also collect similar documentation from all subcontractors, prior to their work commencing.

## Reporting Requirements

It is a requirement of all employees to report all actual or potential hazards immediately. Daily Job Hazard Analysis form (e.g., #HSE01010183, #HSE01010116 - #HSE01010124) are documents used.

## Responsibilities

### *Management*

- Support the development of job hazard analysis.
- Allocate the resources and assign the team to participate in the development process.
- Review worker, supervisor, and JHSC recommendations and update the practices if required.
- Respond to the recommendations in a timely manner.
- Communicate the potential hazards of tasks to all workers.
- Follow up with implemented controls to ensure effectiveness.
- Communicate any new hazard analyses or any update to existing analyses.

- Review the job hazard analysis at least annually.

### *Supervisors*

- Ensure their workers have reviewed the job hazard analysis of the task that relates to their specific workplace and tasks prior to commencing the work.
- Ensure workers understand the potential hazards specified in the job hazard analysis for applicable tasks and can describe them during toolbox talks, worker interviews during inspection, etc.
- Review comments/concerns of the workers regarding the job hazard analysis with the Management or JHSC and provide recommendations.
- Monitor the existence of the job hazard analysis by site observations.
- Ensure the job hazard analysis is readily available to workers.

### *Workers*

- Review and understand the job hazard analyses that are related to their specific job or line of work.
- Review the task prior to beginning the job to understand the potential hazards of the job.
- Report concerns immediately or suggest changes to the job hazard analysis to supervisor or JHSC.

### *Joint Health and Safety Committee*

- Participate in the development and review of job hazard analysis.
- Discuss supervisors or workers' feedback in the meetings.
- Recommend the required changes to the management.

### *Health and Safety Representative*

- Participate in the development and review of job hazard analysis.
- Recommend changes to the management.

## References

Duties of employers – Occupation Health and Safety Act s. 25, 26  
Duties of constructors – Occupation Health and Safety Act s. 23  
Duties of supervisors – Occupation Health and Safety Act s. 27  
Duties of workers – Occupation Health and Safety Act s. 28  
Health and Safety Representative – Occupation Health and Safety Act s. 8  
Joint Health and Safety Committee – Occupation Health and Safety Act s. 9  
Interpretation and Application – Occupational Health and Safety Act s.1(1)



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**Company Policy**  
*Hazard Reporting*



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## Objective

To outline steps to follow in reporting hazardous situations and conditions that may endanger the health and safety of employees.

## Scope

This procedure applies to all MGI Construction Corp. employees.

## Definitions

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

## Procedure

### *1. Hazard identified by worker*

It is one of the duties of workers to report the existence of any hazard of which he or she knows to the employer or supervisor. Hazards that individual employees are unable to correct or eliminate themselves must be reported to their supervisor. The following are the steps to be taken to report such hazards:

1. The employee must fill out appropriate documentation for workplace hazard reporting and submit it for review (supervisor).
2. The supervisor will immediately investigate the reported hazard and identify the required corrective actions. If required, the supervisor may request the assistance of the Joint Health & Safety Committee (JHSC) or the Health & Safety Representative (H&S Rep).
3. The supervisor will make arrangements to notify the appropriate personnel to implement corrective actions.
4. The supervisor will verify that corrective action was taken to mitigate the reported hazard. If the proper corrective action is implemented, these actions will be communicated to workers.
5. If the worker does not receive a response from their supervisor, the worker may then report the hazard to management.

*Note:* This procedure does not apply to situations where a work refusal under the health and safety legislation is involved. These situations are covered in the work refusal literature.

### *2. Hazards identified by the Joint Health & Safety Committee/Health & Safety Representative(s)*

A Health & Safety Representative or the Joint Health and Safety Committee (JHSC) has the power to identify situations that may be a source of danger or hazard to workers and to make recommendations or report his or her findings to the employer and the workers. Worker representative(s) who inspect the physical condition of the workplace will inform the committee of situations that may danger or hazard to workers. Recommendations will be made to the management based on the findings.

## Responsibilities

### *Management*

- Ensure action is taken on identified hazards.
- Inform worker(s) of any hazard in the work and in the handling, storage, use, disposal and transport of any article, device, equipment or a biological, chemical or physical agent.

### *Supervisors*

- Investigate hazardous situations brought to their attention.
- Complete appropriate workplace hazard reporting documents.
- Take corrective action without delay.
- Inform workers of corrective action(s) taken.
- Post the appropriate completed workplace hazard reporting documents on the health and safety board.
- Provide a copy of the completed documents to the JHSC or the Health & Safety Representative.

### *Workers*

- Immediately report hazards to their supervisor.
- Complete appropriate workplace hazard reporting documents.
- Provide recommendations to the supervisor on how to eliminate or control the hazard.
- Inform management if the supervisor does not address the issue.

### *Joint Health & Safety Committee*

- Identify situations that may be a source of danger or hazard to workers.
- Address the hazards in the committee meetings.
- Make recommendations to management as required.

### *Health & Safety Representative*

- Identify situations that may be a source of danger or hazard to workers.
- Inform the hazards to the supervisor or management.

- Make recommendations to management as required.

## References

Duties of employers – Occupational Health and Safety Act, s. 25, 26

Duties of constructors – Occupational Health and Safety Act, s. 23

Duties of supervisors – Occupational Health and Safety Act, s. 27

Duties of workers– Occupational Health and Safety Act, s. 28

Health and Safety Representative– Occupational Health and Safety Act, s. 8

Joint Health and Safety Committee– Occupational Health and Safety Act, s. 9

Worker Trades Committee – Occupational Health and Safety Act, s. 10





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**Company Policy**  
*Work Refusal Procedure*



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## Objective

To ensure prompt and effective management of a work refusal where a worker believes a dangerous condition exists in the workplace.

## Scope

This procedure applies to all MGI Construction Corp. employees.

## Definitions

A worker may refuse to do particular work where he or she has reason to believe that:

- any equipment, machine, device or thing the worker is to use or operate is likely to endanger himself, herself or another worker;
- the physical condition of the workplace or the part thereof in which he or she works or is to work is likely to endanger him- or herself;
- workplace violence is likely to endanger him- or herself; or
- any equipment, machine, device or thing he or she is to use or operate or the physical condition of the workplace or the part thereof in which he or she works or is to work is in contravention of the Occupational Health and Safety Act or the regulations and such contravention is likely to endanger himself, herself or another worker

## Procedure

1. The worker must notify their supervisor that they have a reason to believe their health and safety has been compromised. The worker must be directed to stay in a safe place near the work area. See the appropriate work refusal literature.
2. The supervisor will keep a record of all appropriate information using the work refusal documents.
3. With a member of the JHSC, the supervisor will investigate the work refusal to determine if the unsafe situation exists.

If an unsafe situation exists, immediate corrective action will be taken:

- The supervisor will document the corrective action or the recommended corrective action.
- Signatures of the refusing worker and supervisor must be obtained.

If an unsafe situation does not exist, or corrective action taken eliminates the unsafe situation:

- Make clear to the refusing employee why an unsafe situation does not exist.
  - Instruct the refusing worker to return to the previously assigned job (note that the refusing employee may continue to refuse).
  - Signatures of the refusing worker and supervisor must be obtained.
4. The refusing worker can be assigned another duty and another worker may be assigned to do the work if:
- The worker is qualified to do the job; and
  - The worker is advised of the reason(s) for refusal.

This must be done in the presence of:

- A member of the Joint Health & Safety Committee who represents workers
- A Health & Safety Representative, or

A worker who, because of his or her knowledge, experience, and training, is selected by the trade union that represents the worker or, if there is no trade union, by the workers to represent them.

*Note:* The employee asked to do the work may also refuse. A second work refusal report is not necessary unless different reasons are given for the second work refusal.

5. If the refusing worker does not agree that the condition has been adequately controlled, management must be notified. The worker or management must notify the Ministry of Labour (MOL). Management will fill out continuing work refusal documents.
6. The Ministry of Labour will investigate and provide a report. If the MOL inspector's decision is in favor of the worker, then corrective action(s) must be taken.

## Responsibilities

### *Management*

- Participate in the continuing work refusal process.
- Notify the MOL, if required.
- Fill out the continuing work refusal documents, when required.

### *Supervisor*

- Investigate the situation to determine if the work is unsafe.
- Document the process using work refusal documents.
- Assign another duty to the worker, if able/required.

*Worker*

- Inform a supervisor that they are refusing to do unsafe work.
- Cooperate through the work refusal process.
- Participate in the investigation.

*Joint Health and Safety Committee*

- Participate in the investigation conducted by the supervisor.

References

Occupational Health and Safety Act, Part V, s. 43-49

Duties of employers – Occupational Health and Safety Act, s. 25, 26

Duties of constructors – Occupational Health and Safety Act, s. 23

Duties of supervisors – Occupational Health and Safety Act, s. 27

Duties of workers– Occupational Health and Safety Act, s. 28

Health and Safety Representative– Occupational Health and Safety Act, s. 8

Joint Health and Safety Committee– Occupational Health and Safety Act, s. 9





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January 30, 2024



**Company Policy**  
*Work Refusal Flow Chart*



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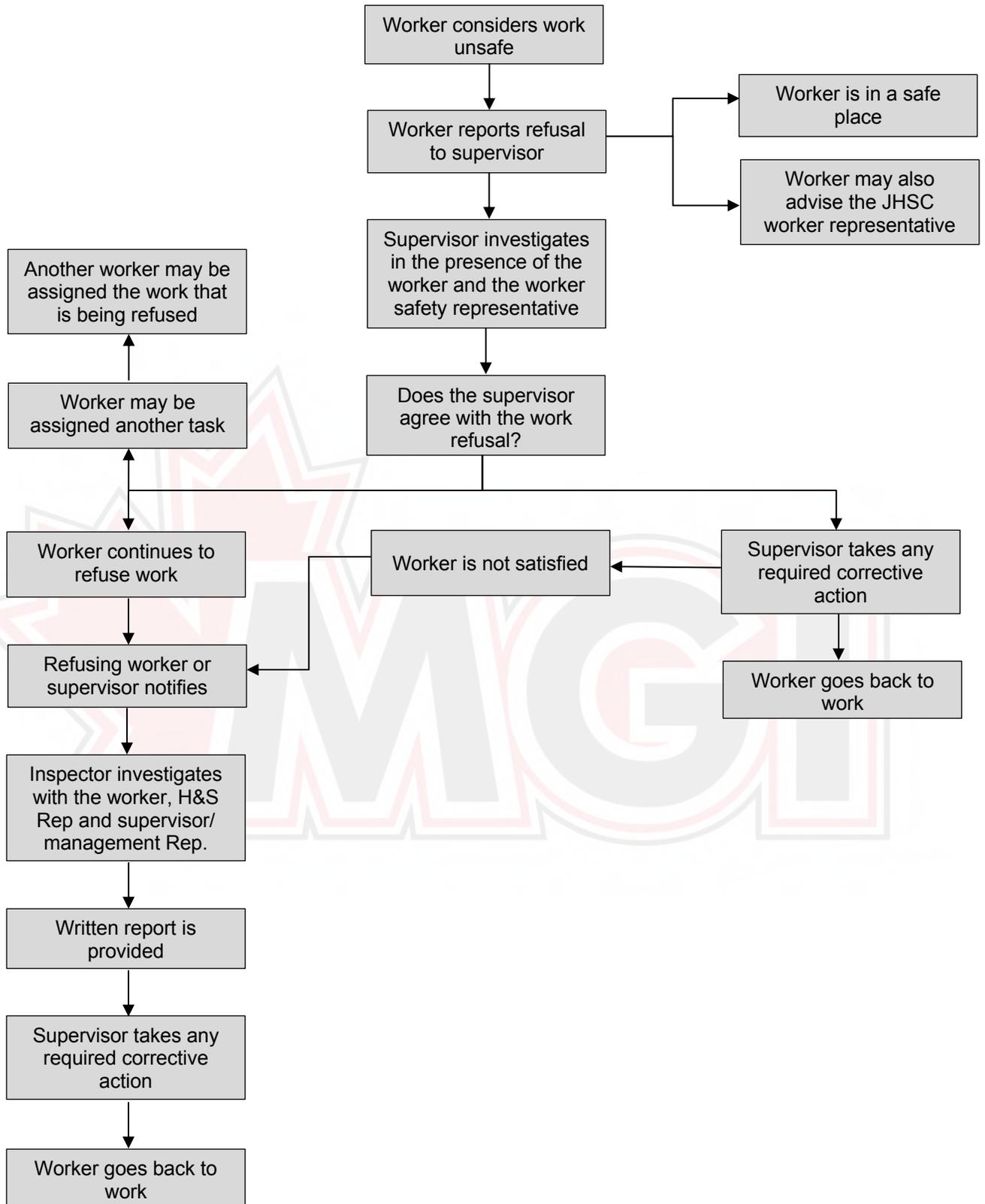


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Document #COP02010004  
January 30, 2024



**Company Policy**  
*Safe Work Practices*



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## Objective

Safe work practices will be used to control the hazards identified in the *Job Hazard Analysis*. The review of relevant safe work practices will be part of training workers to perform their tasks safely.

## Scope

This procedure applies to all MGI Construction Corp. employees.

## Definitions

*Safe Work Practices (SWP)*: written methods outlining how to perform a task with minimum risk to people, equipment, materials, environment, and processes. These are set of guidelines or “do’s and don’ts” on how to perform a specific task.

## Procedure

### 1. *Development of Safe Work Practices*

A job hazard analysis is conducted for all operations and activities at MGI Construction Corp. Safe work practices are developed as a control method to mitigate the hazards identified in the job hazard analysis. The practices will be updated to reflect process changes, and re-approved as appropriate. Safe work practices are developed as a team to incorporate management, supervisors, the Joint Health & Safety Committee (JHSC), and the Health & Safety Representative(s) from sites while encouraging workers’ participation.

### 2. *Review of Safe Work Practices*

Employees will review the safe work practices related to their job and acknowledge that they have understood them during orientation. Supervisors are responsible for ensuring their workers understand the safe work practices that apply to their specific tasks, before the workers performing those tasks. The safe work practices are readily available at all work locations for the workers to review any time.

As workers review the safe work practices, they are encouraged to report any concerns or suggested changes to their supervisor or JHSC. The supervisor or JHSC will review the inputs of workers then make suggestions to the management or JHSC. Supervisor will also incorporate the inputs from orientations, committee meetings and toolbox talks. Safe Work Practices can be found in the Safe Work Practices & Safe Job Procedures manual.

### *3. Approval of Safe Work Practices*

Management will review and approve the safe work practices. Approved practices will be communicated to workers.

### *4. Implementation of Safe Work Practices*

Workers at MGI Construction Corp. will not be allowed to commence work before reviewing safe work practices. Supervisors will monitor the existence of safe work practices with site observations. Supervisor must ensure that workers understand the safe work practices and can describe them. This can be achieved through toolbox talks and worker interview during inspections. Management will be notified of any safe practices additionally needed.

### *5. Document Availability*

Safe work practices will be available at all work locations for the workers to review them any time.

### *6. Annual Review*

The safe work practices will be reviewed annually by management to ensure they are accurate and still reflect the company's scope of work. Management will document that the safe work practices literature has been reviewed at least annually. Worker, Supervisor and JHSC recommendations will be taken into consideration as part of the review. Management will assign the team to develop any new practices and/or update the existing practices as required. New or updated safe work practices will be communicated to all affected workers.

## **Responsibilities**

### *Management*

- Support the development of safe work practices.
- Allocate the resources and assign the team to participate in the development process.
- Review worker, supervisor and JHSC recommendations and update the practices if required.
- Respond to recommendations promptly.
- Communicate the practices to all workers.
- Communicate any new practices or any update to existing practices.
- Review the safe work practices at least annually.

### *Supervisors*

- Ensure their workers have reviewed the safe work practices that relate to their specific workplace and tasks before commencing work.
- Ensure workers understand the safe work practices and can describe them during toolbox talks, worker interview during inspection, etc.
- Review comments/concerns of the workers regarding the safe work practices with the Management or JHSC and provide recommendations.
- Monitor the existence of safe work practices by site observations.
- Have the safe work practices readily available to workers.

### *Workers*

- Review and understand the safe work practices that relate to their specific job.
- Do not proceed with the task before reviewing and understanding the practice.
- Follow the safe work practices while performing the job tasks.
- Report concerns or suggested changes to the safe work practices to supervisor or JHSC.

### *Joint Health & Safety Committee (JHSC)*

- Participate in the development and review of safe work practices.
- Discuss supervisors or workers' feedback in the meetings.
- Recommend the required changes to the management.

### *Health & Safety Representative*

- Participate in the development and review of safe work practices.
- Recommend changes to the management.

### *References*

Duties of employers – Occupation Health and Safety Act s. 25, 26  
Duties of constructors – Occupation Health and Safety Act s. 23  
Duties of supervisors – Occupation Health and Safety Act s. 27  
Duties of workers – Occupation Health and Safety Act s. 28  
Health and Safety Representative – Occupation Health and Safety Act s. 8  
Joint Health and Safety Committee – Occupation Health and Safety Act s. 9



Document #COP02010005  
January 30, 2024



**Company Policy**  
*Safe Job Procedures*



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## Objective

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

## Scope

This procedure applies to all MGI Construction Corp. employees.

## Definitions

*Safe Job Procedures (SJP)*: the step-by-step instructions that must be followed in sequence in order to complete a task or process safely; a written, systematic description of how to complete a job safely and efficiently from start to finish. A safe job procedure must be developed for tasks that hold a risk level of 12 or higher.

*Critical Task*: a task that, if not accomplished following the specified safe job procedure, has the potential to result in a serious adverse effect; a job with high potential for serious loss or injury.

## Procedure

### 1. *Development of Safe Job Procedures*

A job hazard analysis is conducted for all operations and activities at MGI Construction Corp. Safe job procedures are developed for critical tasks, as a control method to mitigate the hazards identified in the job hazard analysis. The procedures will be updated to reflect process changes, and re-approved as appropriate. Safe job procedures are developed as a team to incorporate management, supervisors, Joint Health & Safety Committee (JHSC), Health & Safety Representative(s) from sites and workers' participation.

### 2. *Review of Safe Job Procedures*

Employees will review the safe job procedures related to their job and acknowledge that they have understood them during orientation. Supervisors are responsible for ensuring their workers understand the safe job procedures that apply to their specific tasks, prior to the workers performing those tasks. The safe job procedures are readily available at all work locations for the workers to review at any time.

As workers review the safe job procedures, they are encouraged to report any concerns or suggested changes to their supervisor or Joint Health and Safety Committee (JHSC). The supervisor or JHSC will review the inputs of workers then make suggestions to the management or JHSC. Supervisors will also incorporate the inputs from orientations, committee meetings, and toolbox talks.

Safe job procedures can be found in the Safe Work Practices & Safe Job Procedures document.

### *3. Approval of Safe Job Procedures*

Management will review and approve safe job procedures. Approved procedures will be communicated to workers.

### *4. Implementation of Safe Job Procedures*

Workers at MGI Construction Corp. will not be allowed to commence the work prior to reviewing the safe job procedures. Supervisors will monitor the existence of safe job procedures with site observations. Supervisors must ensure that workers understand the safe job procedures and can describe them. This can be achieved through toolbox talks, during inspections, orientations, or interviews.

Management will be notified of any additional safe job procedures that are needed.

### *5. Document Availability*

Safe job procedures will be available at all work locations for workers to review at any time.

### *6. Annual Review*

The safe work practices will be reviewed annually by management to ensure they are accurate and still reflect the company's scope of work. Management will document that the safe work practices literature has been reviewed at least annually. Worker, Supervisor and JHSC recommendations will be taken into consideration as part of the review. Management will assign the team to develop any new practices and/or update the existing practices as required. New or updated safe work practices will be communicated to all affected workers.

## **Responsibilities**

### *Management*

- Support the development of safe job procedures.
- Allocate the resources and assign the team to participate in the development process.
- Review worker, supervisor and JHSC recommendations and update the procedures if required.
- Respond to the recommendations in a timely manner.
- Communicate the procedures to all workers.
- Communicate any new procedures or any update to existing procedures.
- Review the safe job procedures at least annually.

### *Supervisors*

- Ensure their workers have reviewed the safe job procedures that relate to their specific workplace and tasks prior to commencing the work.
- Ensure workers understand the safe job procedures and can describe them during toolbox talks, worker interviews during inspections, etc.
- Review comments/concerns of the workers regarding the safe job procedures with the Management or JHSC and provide recommendations.
- Monitor the existence of safe job procedures by site observations.
- Have safe job procedures readily available to workers.

### *Workers*

- Review and understand the safe job procedures that are related to their specific job.
- Do not proceed with the task before reviewing and understanding the procedure.
- Follow safe job procedures while performing job tasks.
- Report concerns or suggested changes to the safe job procedures to supervisor or JHSC.

### *Joint Health and Safety Committee*

- Participate in the development and review of safe job procedures.
- Discuss supervisors or workers' feedback in the meetings.
- Recommend the required changes to management.

### *Health and Safety Representative*

- Participate in the development and review of safe job procedures.
- Recommend changes to management.

### *References*

Duties of employers – Occupation Health and Safety Act s. 25, 26  
Duties of constructors – Occupation Health and Safety Act s. 23  
Duties of supervisors – Occupation Health and Safety Act s. 27  
Duties of workers – Occupation Health and Safety Act s. 28  
Health and Safety Representative – Occupation Health and Safety Act s. 8  
Joint Health and Safety Committee – Occupation Health and Safety Act s. 9



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January 30, 2024



## Company Policy

*Head Protection*



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## Objective

The purpose of this policy is to ensure that all employees receive appropriate Personal Protective Equipment (PPE) to protect their health and safety while performing their assigned duties. PPE is required to protect workers against hazards when other controls are not feasible or to supplement other controls.

## Scope

This program applies to any worker who may be exposed to overhead injuries such as dropped material, equipment tools, or working under heavy mobile equipment.

## Procedure

Safety headwear is designed to protect the head from the impact of falling objects, bumps, and contact with energized objects and equipment. It must be able to withstand an electrical contact equal to 20,000 volts phase-to-ground. A hard hat is mandatory to be worn at all times for every worker on an MGI construction project.

### *1. Head Protection Specifications*

There are two types of CSA Group-approved hardhats:

- Type 1: offers impact and penetration protection to the crown only.
- Type 2: provides crown and lateral (side) impact and penetration protection.

### *Classes and Make of Head Protection*

There are many designs but they all must meet CSA requirements for Class G rated for 2,200 volts (general usage); Class E rated for 20,000 volts (electrical trades); and Class C (conductive, do not offer electrical protection). The CSA standard for head protection is Z94.1 (most recent standard), Class E, and Type 1 & 2. Type 2 provides extra protection against side impact.

*Class E* hard hats come in three basic styles:

- Standard design with a front brim, rain gutter, and attachment points for accessories such as hearing protection.
- Standard design with a front brim and attachment points for accessories, but without a rain gutter.
- Full-brim design with attachment points for accessories and a brim that extends completely around the hat for greater protection from the sun.

## *Reversible Hard Hats*

A hard hat should only be worn in reverse only if:

- The hard hat has a reverse orientation mark.
- The job, task, or work environment necessitates wearing it backward (e.g., when wearing a face shield or welding helmet).

Most head protection is made up of two parts:

- The shell (light and rigid to deflect blows).
- The suspension (to absorb and distribute the energy of the blow).

Both parts of the headwear must be compatible and maintained according to the manufacturer's instructions. If attachments are used with headwear, they must be designed specifically for use with the specific headwear used. Bump caps or laceration hats are not considered safety helmets.

## *2. Care, Inspection and Maintenance*

### *Care*

- Proper care is required for headgear to perform efficiently. Its service life is affected by many factors, including temperature, chemicals, sunlight, and ultraviolet radiation (welding).
- Always consult the manufacturer's instructions for use and care instructions of your hard hat. You may also need to know which components of the hard hat must be inspected before each use.
- Clean the shell, suspension, and liner regularly with mild soap and water.
- Don't store your hard hat in direct sunlight—it will age quicker and can become brittle.

### *Inspection*

- Inspect the shell, suspension, and liner before each use. Look for cracks, dents, cuts, or gouges.
- If a hard hat is struck by an object, do not keep using it until a post-inspection deems it safe to use.
- Check the service life of your hard hat by reading the manufacturer's instructions.
- Never alter your hard hat by painting it, making holes in it, etc.

### *Maintenance*

- A hard hat's service life starts when it is placed in service.
- The "date code" stamped on the inside of your hard hat refers to the date of manufacture, not the starting date for useful service.

The following is a recommended replacement schedule:

- Hard Hat Suspension: replace after no more than 12 months;
- Entire Hard Hat - replace after no more than 5 years.

There are many things to look out for that might indicate a hard hat needs replacing, including:

- Expiration date
- Dents
- Scratches
- Cracks
- Painted
- Use of solvents
- Warped
- Scorched
- Taped together
- Exposed to excessive heat
- Excessive cold exposure

## Responsibilities

### *Management*

- Ensure head protection is provided to all workers.
- Ensure supplies are replenished as required.

### *Supervisor*

- Ensure head protection is worn by all workers when required.
- Ensure head protection is used properly by all workers on site.
- Ensure head protection is stored, cleaned, and maintained properly.
- Review head protection compliance problems and requirements in safety meetings with all workers.

### *Worker*

- Participate in personal protective equipment training when applicable.
- Be informed of all hazards and potential hazards on a project.
- Do not remove or make ineffective any protective device required by the regulations or by the employer.

## References

- Duties of employers – Occupational Health and Safety Act, s. 25, 26
- Duties of constructors – Occupational Health and Safety Act, s. 23
- Duties of supervisors – Occupational Health and Safety Act, s. 27
- Duties of workers – Occupational Health and Safety Act, s. 28





Document #COP02010012  
January 30, 2024



**Company Policy**  
*Eye & Face Protection*



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## Objective

The purpose of this policy is to ensure that all employees receive the appropriate Personal Protective Equipment (PPE) to protect their health and safety while performing their assigned duties. PPE is required to protect workers against hazards when other controls are not feasible or to supplement other controls.

## Scope

This program applies to any worker who may be exposed to eye or face hazards such as flying objects, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors or potentially injurious light radiation during work at MGI Construction Corp.

## Procedure

### 1. *Types of Eye and Face Protection*

**Safety glasses:** provides minimum protection for general working conditions where dust, chips or flying particles may present a hazard. They are available in a variety of styles and provide side protection in the form of shields or wraparound arms. Lenses should have an anti-fog treatment.

**Goggles:** provide higher impact, dust, and acid or chemical splash protection than safety glasses. Moulded goggles are suitable when workers are continually exposed to splash or fine dust and should have indirect venting.

**Face shields:** protect the full face from injury and they offer the highest impact protection and shelter from spraying, chipping, grinding, chemicals and blood-borne hazards. A face shield is considered a secondary safeguard to protective eyewear; it should never be worn without safety glasses or goggles.

**Welding goggles:** prevent exposure to harmful radiation when arc welding, gas welding, or burning. These protectors come in various shades and must be matched according to the line of work.

**Prescription Safety Glasses:** if you wear prescription glasses, check whether they qualify as safety eyewear. If not, action must be made to qualify both safety and prescription standards:

- Glasses must be CSA approved.
- Glasses must have side shields.
- Lenses must be made out of polycarbonate or plastic.
- Look for the manufacturer's logo moulded or etched into the top outside edges of the lenses.
- Look for "Z87" on the temple pieces.

## 2. *Proper Fit and Care*

In order to get the maximum benefit from safety eyewear, your glasses need to fit and must be kept clean and when not in use stored in a place where they are not being harmed.

### *Fit*

- Ensure your safety eyewear fits properly. Eyewear should cover from the eyebrow to the cheekbone, and across from the nose to the boney area on the outside of the face and eyes. Eye size, bridge size and temple length all vary. Eyewear should be individually assigned and fitted so that gaps between the edges of the device and the face are kept to a minimum.
- Eyewear should fit over the temples comfortably and over the ears. The frame should be as close to the face as possible and adequately supported by the bridge of the nose.
- Users should be able to see in all directions without any major obstructions in their field of view.

### *Care*

- Clean your devices daily.
- Follow the manufacturer's instructions.
- Avoid rough handling that can scratch lenses. Scratches impair vision and can weaken lenses.
- Store your devices in a clean, dry place where they cannot fall or be stepped on. Keep them in a case when they are not being worn.
- Replace scratched, pitted, broken, bent or ill-fitting devices immediately. Damaged devices interfere with vision and do not provide protection.
- Replace damaged parts only with identical parts from the original manufacturer to ensure the same safety rating.
- Do not change or modify the protective device.

## Responsibilities

### *Management*

- Ensure eye and face protection is provided to all workers.
- Ensure supplies are replenished as required.

### *Supervisor*

- Ensure eye and face protection is worn by all workers when required.
- Ensure eye and face protection are used properly by all workers on site.

- Ensure eye and face protection is stored, cleaned and maintained properly.
- Review eye and face protection compliance problems and requirements in safety meetings with all workers.

#### *Worker*

- Participate in personal protective equipment training when applicable.
- Be informed of all hazards and potential hazards on a project.
- Not to remove or make ineffective any protective device required by the regulations or by the employer.

#### References

Duties of employers – Occupational Health and Safety Act, s. 25, 26

Duties of constructors – Occupational Health and Safety Act, s. 23

Duties of supervisors – Occupational Health and Safety Act, s. 27

Duties of workers – Occupational Health and Safety Act, s. 28





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**Company Policy**  
*Hearing Protection*



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## Objective

The purpose of this policy is to ensure that all employees receive appropriate Personal Protective Equipment (PPE) to protect their health and safety while performing their assigned duties. PPE is required to protect workers against hazards when other controls are not feasible or to supplement other controls.

## Scope

This program applies to any worker who may be exposed to noise exposure that exceeds 85 decibels during work at MGI Construction Corp.

## Procedure

### 1. *Types of Ear Protection*

- *Pre-molded Earplugs*: come in different sizes and shapes to fit different sized ear canals. They have virtually no expansion or contraction, so obtaining a good seal with the ear canal may be challenging.
- *Formable or Foam Earplugs*: when placed in the ear correctly, this type of earplug, will expand to fill the ear canal and seal against the walls. This expansion allows foam earplugs to fit ear canals of different sizes.
- *Earmuffs*: these devices fit against the head and enclose the entire perimeter of the external ear. The inside of the muff cup is lined with acoustic foam, which reduces noise. Their effectiveness depends on how tight the seal is between the foam cushion and the head.
- *Hearing Bands or Canal Caps*: these devices cover the ear canal at its opening. They do not provide as much of a seal inside the ear canal and generally provide less protection than earmuffs or plugs, so they are typically not recommended.

### 2. *Selection of Hearing Protection*

When selecting hearing protection, consider the following:

- Correctness for the job. Refer to the Canadian Standards Association (CSA) Standard Z94.2-14 "Hearing Protection Devices - Performance, Selection, Care and Use" or contact the agency responsible for occupational health and safety legislation in your jurisdiction for more information.
- It provides adequate protection. Check the manufacturer's literature.
- Compatible with other required personal protective equipment, or communication devices.
- Comfortable enough to be accepted and worn.

- Appropriate for the temperature and humidity in the workplace.
- Able to provide adequate communication and audibility needs (e.g., the ability to hear alarms or warning sounds).

### 3. *Proper Fit and Care*

#### *Fit*

- Follow the manufacturer's instructions.
- With earplugs, for example, the ear should be pulled outward and upward with the opposite hand to enlarge and straighten the ear canal and insert the plug with clean hands.
- Ensure the hearing protector tightly seals within the ear canal or against the side of the head. Hair and clothing should not be in the way.

#### *Care*

- Follow the manufacturer's instructions.
- Check hearing protection regularly for wear and tear.
- Replace ear cushions or plugs that are no longer pliable.
- Replace a unit when headbands are so stretched that they do not keep ear cushions snugly against the head.
- Disassemble earmuffs to clean.
- Wash earmuffs with a mild liquid detergent in warm water, and then rinse in clear warm water. Ensure that the sound-attenuating material inside the ear cushions does not get wet.
- Use a soft brush to remove skin oil and dirt that can harden ear cushions.
- Squeeze excess moisture from the plugs or cushions and then place them on a clean surface to air dry. (Check the manufacturer's recommendations first to find out if the earplugs are washable.)

### Responsibilities

#### *Management*

- Ensure proper hearing protection is provided to all workers.
- Ensure supplies are replenished as required.

#### *Supervisor*

- Ensure hearing protection is worn by all workers when required.
- Ensure hearing protection is used properly by all workers on site.
- Ensure hearing protection is stored, cleaned and maintained properly.
- Review hearing protection compliance problems and requirements in safety meetings with all workers.

*Worker*

- Participate in personal protective equipment training when applicable.
- Be informed of all hazards and potential hazards on a project.

References

Duties of employers – Occupational Health and Safety Act, s. 25, 26

Duties of constructors – Occupational Health and Safety Act, s. 23

Duties of supervisors – Occupational Health and Safety Act, s. 27

Duties of workers – Occupational Health and Safety Act, s. 28





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**Company Policy**  
*Respiratory Protection*

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## Objective

The purpose of this policy is to ensure that all employees receive appropriate Personal Protective Equipment (PPE) to protect their health and safety while performing their assigned duties. PPE is required to protect workers against hazards when other controls are not feasible, or as a supplement for other controls.

## Scope

This program applies to any worker who may be exposed to respiratory hazards during their course of work at MGI Construction Corp.

## Definitions

*Accepted respirator:* a respirator tested and certified by procedures established by the National Institute for Occupational Safety and Health (NIOSH).

*Air-purifying respirator:* a respirator with an air-purifying filter, cartridge, or canister that removes specific contaminants by passing ambient air through the air-purifying element.

*Atmosphere-supplying respirator:* a respirator that supplies the respirator user with breathing air/gas from a source independent of the ambient atmosphere.

*Fit test:* the use of qualitative or quantitative methods to evaluate the fit of a specific make, model, and size of a respirator on an individual.

*Hazardous atmosphere:* an oxygen-deficient atmosphere, exceeds occupational exposure limits, presents a fire/explosion hazard, and/or contains an airborne toxic or disease-producing contaminant in concentrations deemed to be hazardous.

*Immediately Dangerous to Life and Health Atmosphere (IDLH):* an atmosphere that poses an immediate threat to life, would cause adverse health effects, or would impair an individual's ability to escape.

*Quantitative fit test:* a test method that uses an instrument to assess the amount of leakage into the respirator to assess the adequacy of respirator fit.

*Qualitative fit test:* a pass/fail test method that relies on the subject's sensory response to detect a challenge agent to assess the adequacy of respirator fit.

*Respirator:* a device to protect the user from inhaling a hazardous atmosphere.

*Service life:* the period during which a respirator provides adequate protection to the user.

*User seal check:* an action conducted by the respirator user to determine if the respirator is properly sealed to the face.

*Tight-fitting facepiece:* a respirator inlet covering that forms a complete seal with the face. This includes a half-face piece that covers the user's nose and mouth under the chin; and a full facepiece that covers the user's nose, eyes, and mouth under the chin.

## Procedure

### 1. Types of Respirators

Two main types:

- air-purifying respirators (APRs)
- supplied-air respirators (SARs)

Air-purifying respirators (APR) can remove contaminants in the air that you breathe by filtering out particulates (e.g., dust, metal fumes, mists, etc.). Other APRs purify the air by adsorbing gases or vapours on a sorbent (adsorbing material) in a cartridge or canister. They are tight-fitting and are available in several forms:

- *Mouth Bit Respirator:* Fits on the mouth and comes with a nose clip to hold nostrils closed, for escape purposes only.
- *Quarter-Mask:* Covers the nose and mouth.
- *Half-Face Mask:* Covers the face from the nose to below the chin.
- *Full Facepiece:* Covers the face from above the eyes to below the chin.

Refer to the Safety Data Sheet(s) (SDS) when working with a new substance. The SDS will identify any respiratory protection required and should specify the type of respirator to be worn.

### 2. Selection of Respirator

- Workers shall be issued only those respirators for which they have been fit tested and medically approved.
- Where an IDLH atmosphere is identified, only pressure-demand self-contained breathing apparatus (SCBA) or a combination pressure-demand supplied-air respirator with auxiliary self-contained air supply, with a minimum rated service time of 15 minutes shall be used.
- Respirators approved for escape only shall not be used for non-emergency applications.
- Atmosphere-supplying respirators that make use of compressed air for breathing shall meet the standards set out in Table 1 of CSA Standard Z180.1-00, Compressed Breathing Air and Systems (March 2000).

- Atmosphere-supplying respirators that make use of ambient breathing air system shall have the air intake located under Appendix B of CSA Standard Z180.1-00, Compressed Breathing Air and Systems (March 2000).

Respirators shall be selected based on the following criteria:

- The health of the worker and the ability to wear a respirator
- Review of the hazard assessment
- Existing legislation and standards
- Work requirements and conditions
- Duration of exposure
- Characteristics and limitations of respirators
- Respirator assigned protection factors

### 3. *Respirator Fit Testing*

Workers must pass an appropriate quantitative or qualitative fit test when using a respirator with a tight-fitting facepiece.

A fit test shall be carried out:

- Before initial use of a tight-fitting respirator
- Whenever there is a change in respirator facepiece (make, model, or size)
- Whenever the employee reports or the supervisor makes visual observations of changes in the employee's physical condition that could affect respirator fit. Such conditions include, but not limited to:
  - Facial scarring
  - Dental changes
  - Cosmetic surgery
  - Obvious change in body weight
  - Facial rash (dermatological condition)

Fit test shall be performed only on workers who are clean-shaven where the facepiece seals to the skin.

When a worker is required to wear other personal protective equipment, such as eye, face, head, and hearing protection during his/her course of work, the same protective equipment shall be worn during the fit test to ensure that they are compatible with the respirator and do not break the facial seal.

When fitting a new respirator, try on several brands and sizes when possible. Different brands will fit slightly differently on your face. Move your head/face or make other movements to determine if the respirator is a good choice for you. The fit of your respirator should be evaluated periodically.

#### 4. Use of Respirator

- Before being assigned any task that requires the use of a respirator, the worker shall complete all the health screening, fit testing and training requirements.
- Workers with facial hair that may interfere with the facepiece seal or valve function on tight-fitting respirators cannot use a tight-fitting respirator.
- Other personal protective devices or equipment shall not interfere with the seal of the facepiece to the face of the worker.
- Sidearms on eyeglasses or any other material such as hair, cloth, tissue, straps and jewelry shall not pass between the face and the sealing surface of the facepiece or interfere with the seal of the tight-fitting facepiece to the face or with the operation of the respirator. Workers who must have corrective eyewear, where the eyewear interferes with the respirator seal, shall be provided with respirator spectacle kits by their supervisor.
- The worker shall check the seal of the facepiece immediately after putting on the respirator.
- The worker should never break the respirator's face-to-facepiece seal to communicate.
- Workers shall not remove their facepieces at any time while working in an IDLH atmosphere.
- Workers shall be permitted to leave the hazardous area for any respiratory-related reason.
- The respirator shall not be altered in any manner. All cartridges, replacement parts, etc., shall be from the same manufacturer as the respirator.
- Where respirators are used for HAZMAT response, confined space entry etc., the appropriate existing legislation, regulations, standards and guidelines shall be consulted.

The worker shall leave the hazardous area if:

- The respirator fails to provide adequate protection
- The respirator malfunctions
- He/she detects air leakage around the face seal
- He/she detects an odour or tastes a chemical
- He/she has increased breathing resistance
- He/she experiences any illnesses or discomforts such as dizziness, nausea, weakness, breathing difficulties, sneezing, fever, chills, confusion, etc.
- He/she experiences extreme discomfort from wearing the respirator
- He/she needs to wash his/her face and facepiece to minimize skin irritation
- Components (including air tanks) or purifying devices need change-out

#### 5. Cleaning, Inspection, Maintenance and Storage of Respirators

MGI Construction Corp. shall provide each worker requiring a respirator with a respirator that is clean, sanitary and in good working order.

- The respirator shall be cleaned and sanitized according to the respirator manufacturer's instructions.
- The frequency of cleaning shall depend on how many workers use the respirator and what it is used for.
- Respirators issued to individual workers shall be cleaned and disinfected as often as necessary to maintain proper hygiene.
- A single respirator issued to multiple workers must be cleaned and disinfected before each use.
- Respirators designated for emergency use only must be cleaned and disinfected after each use.
- The worker shall inspect his/her respirator before and after each use.
- The SCBA cylinders shall be inspected by a qualified person according to the requirements of CSA Standards CAN/CSA-B339 and CAN/CSAB-340, the appropriate CGA publications C-6, C-6.1, and C-6.2 the Transport Canada Regulations under the Transportation of Dangerous Goods Act, and the manufacturer's instructions.
- The emergency SCBA shall be inspected on a schedule to ensure readiness for the anticipated emergency use.
- The records of all inspections and services performed on an SCBA respirator and cylinder shall be maintained by the person responsible for the unit.
- The worker shall report defective or non-functioning respirators to his/her supervisor. These respirators shall be tagged and removed from service by the supervisor until repaired or replaced.
- Any respirator and cylinder repairs and subsequent tests and checks shall be performed by the unit manufacturer or by a qualified external contractor. Defective or nonfunctioning half-mask facepieces shall not be repaired but will be disposed of and replaced instead.
- The worker shall store their respirators in a clean and sanitary location. The respirators shall be stored in a manner that will protect them from dust, ozone, sunlight, heat, extreme cold, excessive moisture, vermin, damaging chemicals, oils, greases, or any other potential hazard that may have a detrimental effect on the respirator.
- When packed or stored, each respirator should be positioned to retain its natural configuration.
- Used cartridges/filters to be reused shall be stored in a manner to prevent contamination of the respirator facepiece.

Each worker issued a respirator shall properly maintain his/her respirator to retain its original effectiveness. The maintenance shall include:

- Cleaning and sanitizing
- Inspection and testing
- Proper storage

Repair and maintenance consist of those activities related to restoring a respirator to the manufacturer's original operating condition, including:

- Operation of the respirator;
- Care, cleaning, and inspection;
- End-of-service recognition;
- Change-out of filter elements;
- Replacement of air cylinders;
- Identification of problems;
- Storage;
- Removal from service; and
- Familiarity with and adherence to the manufacturer's instructions. This function requires that the individual maintain appropriate records. These activities can require a periodic proficiency review of the manufacturer's standards.

If there is any doubt about the correct type of protection for a specific material and operation, consult the manufacturer of the product, a supplier or manufacturer of respirators, or the CSAO.

## Responsibilities

### *Management*

- Ensure appropriate respirators are provided to all workers.
- Ensure supplies are replenished as required.

### *Supervisor*

- Ensure respirator is worn by all workers when required.
- Ensure respirator is used properly by all workers on site.
- Ensure respirator is stored, cleaned and maintained properly.
- Review respirator compliance problems and requirements in safety meetings with all workers.
- Provide fit tests to all workers before using respirators.

### *Worker*

- Participate in respirator training when applicable.
- Be informed of all hazards and potential hazards on a project.
- Do not remove or make ineffective any protective device required by the regulations or by the employer.

## References

- Duties of employers – Occupational Health and Safety Act, s. 25, 26
- Duties of constructors – Occupational Health and Safety Act, s. 23
- Duties of supervisors – Occupational Health and Safety Act, s. 27
- Duties of workers – Occupational Health and Safety Act, s. 28





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## Company Policy

*Foot Protection*



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## Objective

The purpose of this policy is to ensure that all employees receive appropriate Personal Protective Equipment (PPE) to protect their health and safety while performing their assigned duties. PPE is required to protect workers against hazards when other controls are not feasible or to supplement other controls.

## Scope

This program applies to any worker who may be exposed to a variety of injuries, impact, compression, and puncture during work at MGI Construction Corp.

## Procedure

### 1. *Selection of Footwear*

Footwear must be chosen based on the hazards that are present. Assess the workplace and work activities for:

- Materials handled or used by the worker.
- Risk of objects falling onto or striking the feet.
- Any material or equipment that might roll over the feet.
- Any sharp or pointed objects that might cut the top of the feet.
- Objects that may penetrate the bottom or side of the foot.
- Possible exposure to corrosive or irritating substances.
- Possible explosive atmospheres including the risk of static electrical discharges.
- Risk of damage to sensitive electronic components or equipment due to the discharge of static electricity.
- Risk of coming into contact with energized conductors of low to moderate voltage (e.g., 220 volts or less).
- Type of walking surface and environmental conditions workers may be exposed to (e.g., loose ground cover, smooth surfaces, temperature, wet/oily, chemicals, etc.).

Also, evaluate the risk:

- to ankles from uneven walking surfaces or rough terrain;
- of foot injury due to exposure to extreme hot or cold;
- of slips and falls on slippery walking surfaces;
- of exposure to water or other liquids that may penetrate the footwear causing damage to the foot and the footwear;
- of exposure to rotating or abrasive machinery (e.g., chainsaws or grinders).

All jurisdictions in Canada require that workers wear adequate protection against workplace hazards. For workers exposed to foot hazards, the required protection is protective footwear certified by the CSA Group (CSA Standard "Protective Footwear",

CAN/CSA-Z195-14). All working footwear, for both men and women, whether it is safety wear or not, should provide comfort without compromising protective value. Also, protective footwear should conform to CSA Standard CAN/CSA-Z195-14.

A steel toe cap should cover the whole length of the toes from tips to beyond the natural bend of the foot. A soft pad covering the edge of the toecap increases comfort. If the toecap cuts into the foot, either the size or style of the footwear is incorrect.

Soles come in a variety of thicknesses and materials. They need to be chosen according to the hazards and type(s) of flooring in the workplace. Uppers of protective footwear come in a variety of materials. Selection should take into account the hazards and individual characteristics of the worker's foot. A steel midsole that protects the foot against penetration by sharp objects should be flexible enough to allow the foot to bend.

No one type of non-slip footwear can prevent the wearer from slipping on every surface type.

## 2. *Proper Fit and Care*

### *Fit*

- Try on new boots around midday. Feet normally swell during the day.
- Walk in new footwear to ensure it is comfortable.
- Boots should have ample toe room (toes should be about 12.5 mm from the front). Do not expect footwear to stretch with wear.
- Make allowances for extra socks or special arch supports when buying boots. Try on your new boots with the supports or socks you usually wear at work. Check with the manufacturer if adding inserts affect your level of protection.
- Boots should fit snugly around the heel and ankle when laced.
- Lace-up boots fully. High-cut boots provide support against ankle injury.

### *Care*

- Use a protective coating to make footwear water-resistant.
- Inspect footwear regularly for damage (e.g., cracks insoles, breaks in leather, or exposed toe caps).
- Repair or replace worn or defective footwear.
- Electric shock resistance of footwear is greatly reduced by wet conditions and with wear.
- Footwear exposed to sole penetration or impact may not have visible signs of damage. Replacing footwear after an event is advisable.

## Responsibilities

### *Management*

- Ensure appropriate footwear is worn by employees.

### *Supervisor*

- Ensure protective footwear is worn by all workers when required.
- Ensure protective footwear is used properly by all workers on site.
- Ensure protective footwear is cleaned and maintained properly.
- Review protective footwear compliance problems and requirements in safety meetings with all workers.

### *Worker*

- Participate in personal protective equipment training when applicable.
- Be informed of all hazards and potential hazards on a project.
- Do not remove or make ineffective any protective footwear required by the regulations or by the employer.

## References

Duties of employers – Occupational Health and Safety Act, s. 25, 26  
Duties of constructors – Occupational Health and Safety Act, s. 23  
Duties of supervisors – Occupational Health and Safety Act, s. 27  
Duties of workers – Occupational Health and Safety Act, s. 28



Document #COP02010017  
January 30, 2024



**Company Policy**  
*Skin Protection*



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## Objective

The purpose of this policy is to ensure that all employees receive appropriate Personal Protective Equipment (PPE) to protect their health and safety while performing their assigned duties. PPE is required to protect workers against hazards when other controls are not feasible or to supplement other controls.

## Scope

This program applies to any worker who may be exposed to injuries such as burns, cuts, scrapes, puncture wounds, radiation, chemical exposures, etc. during work.

## Procedure

Workers should wear proper hand and skin protection when working on site. On every construction project, workers are required to use the appropriate protection when there is a risk of injury from contact between the worker's skin and:

- A noxious gas, liquid, fume, or dust
- An object that may puncture, cut or abrade the skin
- A hot object, hot liquid or molten metal
- Radiant heat

Wearing hand/skin protection will reduce the exposure to physical, chemical and radiation hazards.

### 1. *Type of Hazards*

#### *Physical*

<b>Physical Work Conditions</b>	<b>Recommended Gloves</b>
<ul style="list-style-type: none"><li>• Sharp edges of tools, material or equipment</li><li>• Splinters</li><li>• Heat</li></ul>	Leather gloves
<ul style="list-style-type: none"><li>• Light duty job</li></ul>	Cotton gloves
<ul style="list-style-type: none"><li>• Using power tools and equipment that causes vibration to the hand and arm</li></ul>	Anti-vibration gloves

### *Chemical*

Gloves and skin protection should be determined and worn according to the SDS of the chemicals used. An SDS for the chemicals used should be available at all locations for workers to easily access and refer to.

Caution: Common glove materials that are used on-site do not protect workers from all hazards. Gloves may dissolve due to the exposure of hazards.

### *Ultraviolet*

Workers who work outdoors are at risk of ultraviolet radiation. Long-term risks such as skin cancer and melanoma can be caused by exposure to sunlight, which is the main source of UV radiation.

The following are what workers can do to reduce the exposure of UV radiation:

- Apply SPF 30 sunscreen regularly.
- Add UV protection to the back of your neck by using a fabric neck protector that clips onto the hard hat.
- Wear clothing that covers as much of the skin as possible. Tighter woven material will offer greater protection.

Other PPE that can help reduce the exposure to physical, chemical and/or ultraviolet radiation hazards are:

- Coveralls
- High visibility vests
- Aprons

### *2. Care and Maintenance*

- Follow the manufacturer's instructions.
- Check gloves and protective clothing for wear and tear.
- Ensure to provide management damaged gloves when receiving new gloves.
- Clean gloves and protective clothing to prevent debris development.

## **Responsibilities**

### *Management*

- Ensure skin protection is available to all workers.
- Ensure supplies are replenished as required.

### *Supervisor*

- Ensure skin protection is worn by all workers when required.
- Ensure skin protection is used properly by all workers on-site.
- Ensure skin protection is stored, cleaned, and maintained properly.
- Review skin protection compliance problems and requirements in safety meetings with all workers.

### *Worker*

- Participate in personal protective equipment training when applicable.
- Be informed of all hazards and potential hazards on a project.
- Do not remove or make ineffective any protective device required by the regulations or by the employer.

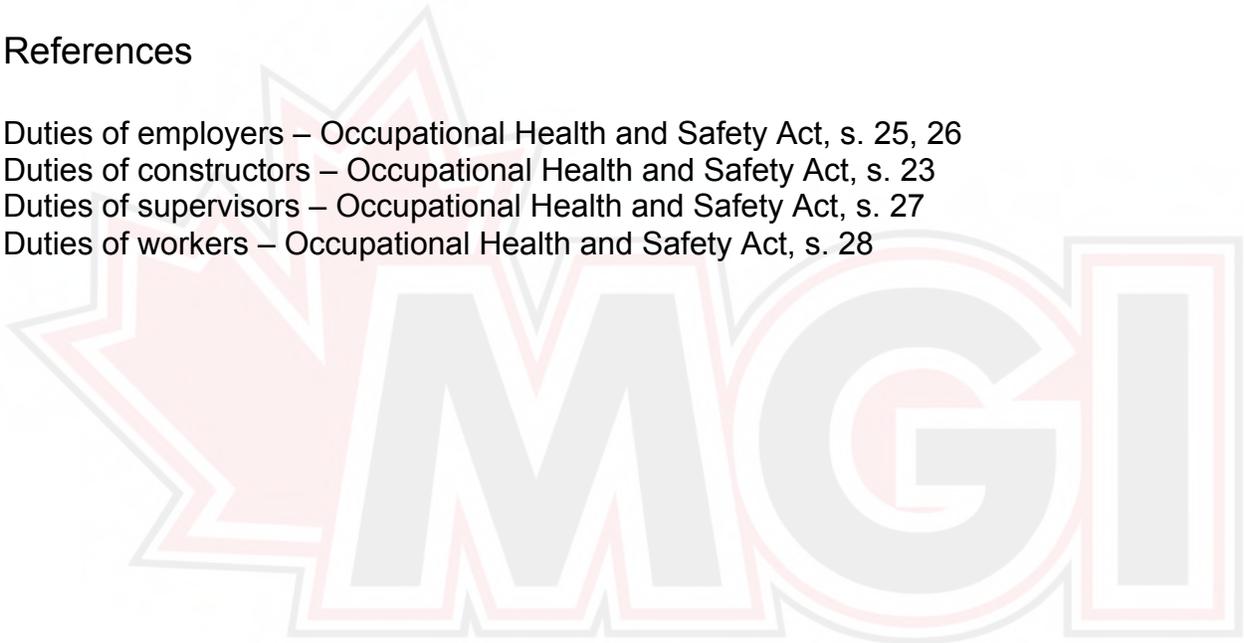
### References

Duties of employers – Occupational Health and Safety Act, s. 25, 26

Duties of constructors – Occupational Health and Safety Act, s. 23

Duties of supervisors – Occupational Health and Safety Act, s. 27

Duties of workers – Occupational Health and Safety Act, s. 28





Document #COP02010018  
January 30, 2024



**Company Policy**  
*Fall Protection*



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## Objective

The purpose of this policy is to ensure that all employees receive appropriate Personal Protective Equipment (PPE) to protect their health and safety while performing their assigned duties. PPE is required to protect workers against hazards when other controls are not feasible or to supplement other controls.

## Scope

This program applies to any worker who may be exposed within 2m (6'6") of a fall hazard where a guardrail cannot be used during work at MGI Construction Corp.

## Definitions

*Personal Fall Protection Equipment:* an assembly of components including a full-body harness or safety belt (CSA approved), lanyard, lifeline, rope grab, and adequate anchorage which must be worn in the event where work must be completed within 2m (6'6") of an unprotected surface edge.

*Travel Restraint System:* a system that allows the worker to conduct work close to the surface edge of the building while preventing a fall hazard. It is a fall prevention method and cannot be used as a fall-arrest. The worker wears a full-body harness attached to an adequate anchorage point of a building's permanent fixture.

*Fall restricting System:* a fall arrest system designed to limit the free-fall distance to no more than 0.6metres (1'11"). Fall restricting systems are mainly used with ladder applications in a confined space, telecommunications, crane installations, utilities, etc.

*Fall Arrest System:* a means of protection after the fall or to control the severity of the fall's force. The system cannot prevent a fall from occurring. It must be maintained, supervised, and in good condition. The worker must not fall hitting an object, the ground, or bring them to a level beneath when a fall arrest system is in place.

## Procedure

### 1. Classes of Harnesses (5)

The Canadian Standards Association (CSA) regulates the classifications for full-body harnesses. A harness can have more than one classification, however, all full-body harnesses must meet the requirements for Class A Fall Arrest.

- *Class A Fall Arrest*

Class A harnesses are designed to protect workers when they are 6' or more above the ground. They support the body during and after a fall. Dorsal (back) D-rings are used for fall protection. They slide on impact, keeping the worker in an upright position.

- *Class AD Suspension and Controlled Descent*

Class AD harnesses are used to support and hold a worker while being raised and lowered. There is one sternal (front) D-ring and one dorsal (back) D-ring. The sternal D-ring is used for attachment to a descent device.

- *Class AE Limited Access*

Class AE harnesses are designed to raise or lower a worker through a confined area. Shoulder D-rings serve as anchorage points for attaching an extraction yoke or other rescue devices. The D-rings slide on the shoulder strap for the optimal positioning of the worker.

- *Class AL Ladder Climbing*

Class AL harnesses are designed for use with a certified fall arrester that travels on a vertical lifeline or a rail. Sternal (front) D-rings are used for attachment to the vertical system.

- *Class AP Work Positioning*

Class AP harnesses will hold and sustain a worker at a specific location, allowing full use of the hands, while limiting any free fall to two feet or less. Slide D-rings at waist level are used for positioning and restraint.

*Recommended Units:*

*Full Body Harness:* a full-body harness is used to stop a worker from an accidental fall in an upright position by equally distributing the weight through the shoulder straps of the leg and shoulder. The assembly of the harness provides suspension support to the upper body. In the event of a fall, the harness provides enough support that it does not further let go or drop the worker. There are 6 components of a full-body harness: shoulder straps, chest straps, sub-pelvic strap, fall arrest D-ring, buckles and leg/thigh straps.

*Carabiner (D-clip):* the carabiner is a personal fall protection device made to remain completely closed while linking components. Opening the keeper requires two steps: twisting and pulling the locking mechanism back. The shape of the carabiner is an oblong ring and self-locks on the components it adjoins when pushed back. The spring mechanism loaded inside the gate helps it lock.

*Lanyard/Shock Absorber (Energy Absorber):* a lanyard connects a full-body harness or safety belt to a rope grab that connects with a lifeline or anchor. It is a flexible and sturdy rope line made of wire, synthetic, or webbing. The lanyard must be CSA Standard approved and come from manufactured sources only. The lanyard associated with a shock absorber shall be used in a fall arrest system. During a fall, a shock absorber reduces the impact applied to the worker. A shock absorber can come either previously attached to the lanyard or separately when bought in standard size or for heavier use. A lanyard with a built-in shock absorber must have a constant diameter or range.

*Lifeline:* a piece of steel wire rope or synthetic fibre that assists as a component of fall arrest. The lifeline connects the fall arrest or travel restraint system to an adequate anchorage point.

*Snap Hook:* the lanyard connects to the full-body harness and lifeline with a snap hook. The bottom keeper of the snap hook has a spring mechanism that needs to be lowered inside the hook to create an opening to connect, otherwise, it remains locked. To prevent unplanned rollouts of adjoining ends, snap hooks must be enforced. Snap hooks that do not lock must not be used.

*Not Recommended Units:*

*Grab Hook:* a grab hook connects components needed to make a personal protection system. However, grab hooks do not close completely on the equipment it connects. This is not recommended equipment and although available, must not be used according to CSA requirements.

*Safety Belt:* a safety belt is worn around the waist. The belt must function as per its intended use. It must not be used as a fall arrest method.

## *2. Selection of Shock Absorber*

The force required to deploy a shock absorber must be at a minimum of 6 kilonewtons (1,349 pounds). The force of the shock absorber shall not be greater than the used material's allowable unit stress. This is applicable if the shock absorber, a component of the lanyard, is used in the fall arrest system.

A fall arrest system must be capable of supporting a minimum of 8 kilonewtons in static force without going over the allowable unit stress for each material used.

With a shock absorber, a fall arrest system must be capable of supporting a minimum static force of 6 kilonewtons without exceeding the allowable unit stress for each material used.

### 3. *Horizontal and Vertical Lifelines*

There are requirements to protect horizontal and vertical lifelines while in use. Both require the design of a professional engineer and must follow CSA standards. All types of lifelines must be free from splices or knots unless the knots are used for fixed supports. A complete design copy of the lifeline used must be available on site.

#### *Vertical Lifeline*

- 16mm synthetic rope (typical use)
- One person to use at a time
- Reach the surface or level above
- Positive stop to prevent run offs from the lifeline's end (e.g., rope grab)

#### *Horizontal Lifeline (Standard Design/Site Specific)*

- The design must indicate arrangements, components, anchorage points, and all loads used
- All required components must be listed
- Indicate the number of workers allowed to use one lifeline at a time
- Clear instructions are given for inspection, installation, and maintenance

#### *Lifeline Protection*

- Free of splices or knots
- Free from areas exposed to chemicals, gasoline, or objects
- Discoloration, frailty, brittle
- Sun exposure, extreme heat, friction from normal movement
- Damages with rough, abrasive surfaces
- Work requiring flame or welding

### 4. *How to Put On/Take Off Personal Fall Arrest Equipment*

The following steps are required to put on and take off personal fall arrest equipment that allows for easy use, storage, and maintenance.

#### *Put On Steps*

1. Hold the harness by the back of the D-ring and then shake, allowing all the straps to fall into place.
2. Unbuckle the waist strap and release the leg, chest, and shoulder straps if not already done so.
3. Put the straps over the shoulders, so the D-ring is in the back's middle between the shoulder blades.
4. Fasten both legs straps, then the waist strap.

5. Fasten chest strap by making sure the shoulder straps are firm and positioned to the center of your chest.
6. Fasten all the buckles ensuring the harness is tight but comfortable.
7. Use the snap hook to connect the D-ring of the harness to the lanyard.

#### *Take Off Steps*

1. Unfasten all the buckles.
2. Loosen all the straps of the harness including the leg straps, chest straps, and waist straps.
3. Extend all the straps out so that it is easier for the next person to put on.
4. Take off the harness and lay on a clean surface.
5. Fold each leg strap into the waistband then the shoulder straps.

#### *5. Set-up, Use, Maintenance and Storage*

MGI Construction Corp. will provide workers with appropriate fall arrest or travel restraint equipment. There are steps required to properly set-up, use, maintain, and store travel restraint and fall arrest equipment. These steps allow the worker to safely use the components required for personal fall protection. The following guidelines shall be maintained on an everyday basis and reviewed by a competent person on an ongoing basis.

#### *Harness*

- Chest-strap must be comfortable and in the middle of the worker's chest
- Leg strap (worker's fist can comfortably go between the strap and leg)
- Adjust harness straps to put D-ring between the shoulder blades

#### *Carabiners*

- Made not to disconnect under twist loads

#### *Lanyard*

- Manufactured and to specific lengths
- The lanyard must not be made smaller by making knots
- Knots can reduce the effectiveness of a lanyard
- Do not store near chemicals, wet places, or sharp objects
- Prevent exposure to sunlight
- One D-ring cannot link two lanyards
- Use Y lanyards if two must be used

### *Lifelines*

- The lifeline's set-up with the shock absorber in the overall system requires the manufacturer's instructions (e.g., horizontal position)
- A vertical lifeline to be used by one person only
- Free of splices or knots (unless knots used for fixed supports)
- Always store separately and do not store with chemicals, gasoline, or objects

### *Rope Grab*

- Manufactured to a specific diameter
- Manufactured to a particular lifeline (compatibility)
- Correctly attached to the lifeline so that it is not inverted
- Indicated arrow denotes the direction of attachment to lifeline
- Each rope grab is designed for use with a specific length of lanyard (normally 2' or 3' maximum)

### *Snap Hook/Grab Hook*

- Must close completely
- Do not attach one snap hook to another
- Must be connected to a compatible hardware
- Ensure snap hook spring has enough tension power to close the keeper

## Responsibilities

### *Employer*

- Ensure written fall protection policy and procedures relevant to the workplace. Policy and procedures must be easily accessible for review when required.
- Identify potential hazards and injuries due to falls.
- Consider and provide the use of passive fall arrest systems such as guardrails, travel restraints, or fall-restricting systems.
- Provide education and training for workers and supervisors about their responsibility regarding fall protection and prevention. Workers must be educated about the proper methods of fall protection before allowed into the work area.
- Ensure all PPE, clothing, and devices are provided and maintained in good condition.
- Ensure effective use of PPE according to applicable policy and procedures, legislation, and manufacturer guidelines.
- Review plan as necessary according to the demands of the workplace to ensure the plan is optimal in fall prevention and protection.

### *Supervisor*

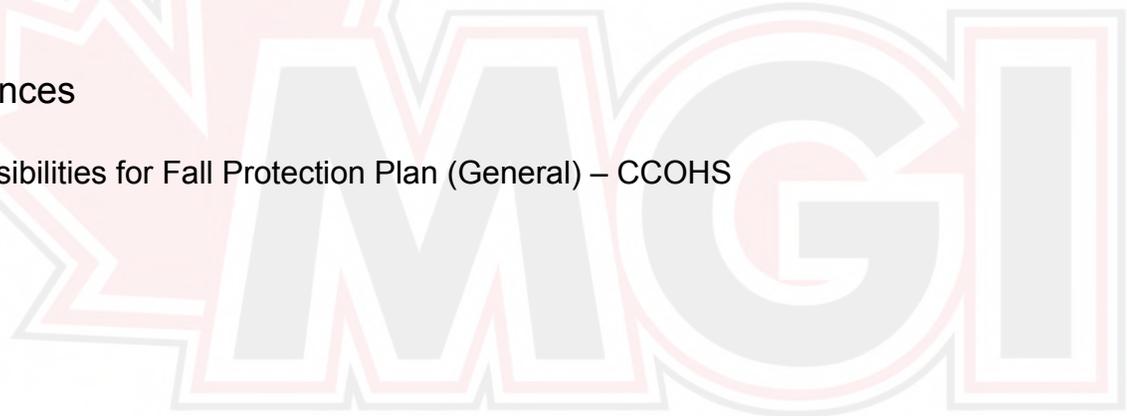
- Ensure workers use and know how to wear appropriate PPE.
- Inform workers about fall hazards and working at heights.
- Act on reasonable safety concerns provided by the workers (e.g., defective equipment, safety concerns)
- Participate in fall protection planning if relevant and when assistance is requested.

### *Worker*

- Inform the supervisor regarding potential fall hazards pre-operation.
- Participate in fall protection planning if relevant and when assistance is requested.
- Adhere to all applicable fall protection legislation and company policy and procedures.
- Actively participate in fall protection education and training.
- Wear and use appropriate PPE as determined by the employer.
- Inspect PPE before each use.
- Take good care of PPE where possible. Notify supervisor or employer of any broken, defective or missing PPE.
- Understand the right to refuse unsafe work.

### References

Responsibilities for Fall Protection Plan (General) – CCOHS





Document #COP02010022  
January 30, 2024



**Company Policy**  
*Fall Rescue Plan*



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## Objective

To provide a companywide, site-specific policy and procedure for the rescue of a worker whose fall has been arrested on any MGI Construction Corp. project or site location. This Procedure may be subject to change as the work processes continue to evolve. Any changes will be made under the direction of the Health & Safety Department.

## Legislation

The Fall Protection Plan intends to assist site personnel in meeting the requirements of Section 26.1 (4) of the Occupational Health & Safety Regulations for Construction Projects.

## Scope

This policy and procedure will apply when a worker may be using a fall protection system while performing his/her regular daily duties and shall be implemented should a worker be involved in a fall arrest circumstance.

## Procedure

All employees of MGI, sub-contractors to MGI, and visitors will be made aware of this procedure through a site orientation. The program will assist in dealing with either a conscious or an unconscious worker who may be in a fall arrest situation.

1. The site superintendent takes control of the situation.
2. The site superintendent sounds the emergency alarm/air horn. All workers stop working and proceed to the designated assembly point.
3. The site superintendent is to identify any further risk to the fallen worker, other workers and the rescue team.
4. The site superintendent sends for further help/assistance.
5. The site superintendent is to notify emergency services (i.e., 911, Fire) and the Ministry of Labour (MOL).
6. An elevated work platform or scissor lift shall be positioned at the suspended worker for worker retrieval.
7. Ensure the rescue team is trained on the machine and is wearing a full-body harness attached to an appropriate anchor point.
8. Ensure the machine being used for rescue has a load capacity for both the rescuer and fallen worker.
9. The rescuer shall position the machine directly below the fallen worker and disconnect the worker's lanyard once it is safe to do so. Once the worker is safely on the machine, a new lanyard shall be provided to the fallen worker and it is to be attached to the designated anchor point before moving the machine.
10. Raise the fallen worker to a safe location and continue to administer first aid. Treat the worker for the suspension trauma and any other injury.

11. The emergency responders shall take control of the scene once they arrive at the scene.

## Rescue Equipment

- Elevating work platform
- Full body harness
- 2 or more lanyards

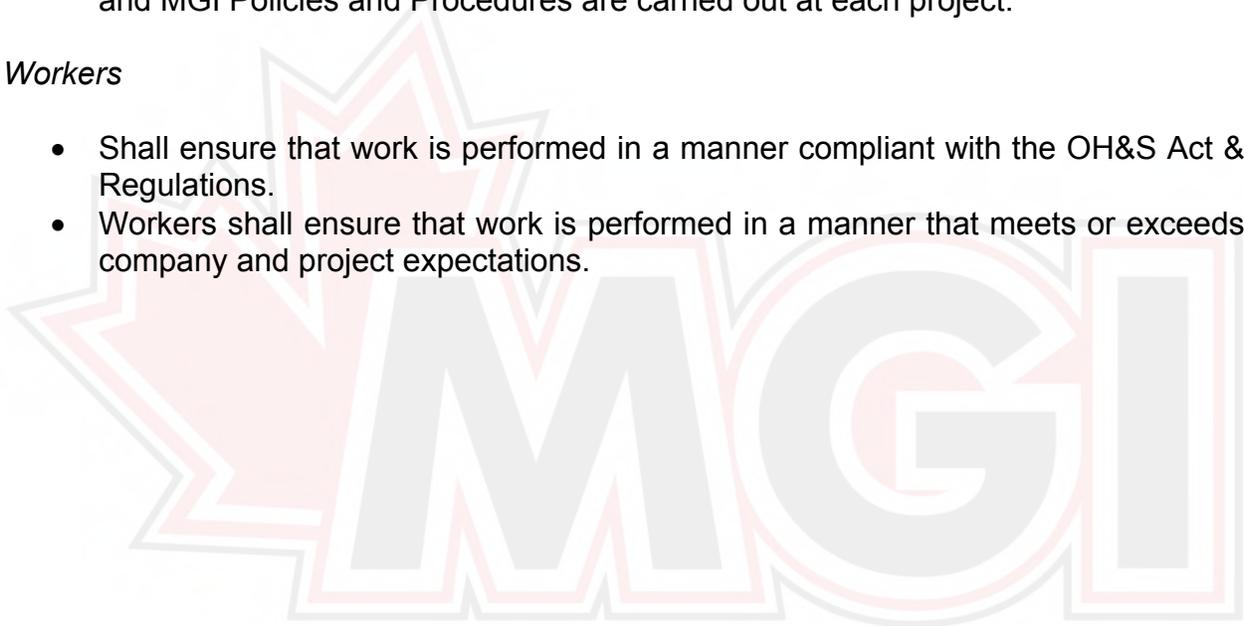
## Responsibility

### *Management/Supervisors*

- Shall ensure that all measures and procedures prescribed in the Act & Regulations and MGI Policies and Procedures are carried out at each project.

### *Workers*

- Shall ensure that work is performed in a manner compliant with the OH&S Act & Regulations.
- Workers shall ensure that work is performed in a manner that meets or exceeds company and project expectations.





Document #COP02010034  
January 10, 2024



**Company Policy**  
*Emergency Preparedness*



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## Objective

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

## Scope

This procedure applies to all MGI Construction Corp. employees and subcontractors.

## Definitions

*Emergency:* a present or imminent situation that requires prompt action to prevent or limit:

- Critical injury (as defined by the OHSA) of a member of the project team, including a worker, sub-trade or a member of the public
- Major disruption to operations (e.g., natural causes, fire/explosion, equipment failure, utility contact/damage, structural collapse, chemical spill, strike or work stoppage, power failure)
- Serious damage, theft, or destruction, or vital records (i.e., information that is essential for the continuation of daily operations, or which contains information which is essential to recreate the organization's legal and financial position and preserve its rights and those of its employees, customers, and stakeholders) or property (e.g., equipment, tools, materials, or office equipment and supplies)
- Workplace violence causing injury to a worker, sub-trade, or public; and/or causing damage, or destruction of company records and/or property

*Assembly point:* an area designated by the site supervisor to be the meeting point to which all site personnel must evacuate to in the case of an emergency. A site may have more than one assembly area to accommodate all personnel on-site. These are noted in the emergency response plans.

*Emergency access and egress routes:* possible emergency routes that are to be utilized by personnel during the evacuation of the job site and/or by emergency services to access an accident/crisis scene. These are noted in the emergency response plans.

## Procedure

### 1. *Emergency Response Plans (ERP)*

During the site setup, the supervisor must develop a plan to reflect the specifications of the job site. This plan must include:

- A list of workers along with their contact information who will be responsible in emergencies.

- A description of potential emergencies that could occur on site.
- A method of reporting the emergency.
- A system for communication to all employees, internally and externally (e.g., two-way radios, telephones, alarms).
- Creating a site emergency map outlining the safety zone, emergency access and egress routes on site, location of emergency equipment, first aid station, fire extinguishers.
- The manager's routine for shutdown of the job, if required.
- Implementation of an alarm system (tested periodically), that will signal to all on-site personnel that an emergency is in progress, if applicable.
- An evacuation, headcount, and rescue plan, which is only attempted by trained personnel.
- A list of emergency contact numbers.
- Input and approval of subcontractors, clients, neighbours, and emergency services.

Once developed, the plan must be approved by senior management and the plan must be communicated during the site orientation of all personnel who will be involved in the daily operations of that project. The plan must be made accessible to all workers on-site. Resources and equipment required for the ERPs, for the site, will be provided by management. Supervisors and/or workers need to notify management when resources need to be replaced or replenished.

## 2. *Testing*

At the office/shop, the ERP must be tested at least annually. Site supervisors must test their ERP at least once during the duration of a project if the project will exceed one year or if the site constructor does not have a site ERP in place. This could be done through a mock evacuation. Deficiencies and corrective action plans will be documented using the Evacuation Drill form (HSE01010060) and Corrective Action Plan form (HSE01010012). A review should always be held after an emergency to correct any deficiencies in the plan. Records will be kept on MGI's electronic file database.

## Potential Emergencies

The following outline the necessary responses for some potential emergencies, identified by job hazard assessments, which will be led by the emergency leads (e.g., supervisor, Joint Health & Safety Committee members, Health & Safety Representative). These responses are in place to minimize injury and protect the health of employees when encountering possible emergencies at MGI Construction Corp.:

### *Medical*

1. Evaluate the incident area to ensure that it is safe for you.
2. Do not move the victim unless a greater danger exists.
3. Alert supervisor or the nearest trained first aider.

4. The first aider must provide first aid if required.
5. The supervisor will contact 911 or provide immediate transportation to medical aid.
6. The supervisor will ensure a report form or investigation form is filled out as required.
7. Management will report to the WSIB or MOL as required.

#### *Power Failure*

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

#### *Gas Leak*

1. Evacuate the area to an upwind location.
2. Alert the supervisor.
3. The first aider should identify and evaluate any injuries.
4. If required, contact 911 or have the supervisor arrange for immediate transportation to the doctor's office or hospital as required.
5. Contact the utility contractor responsible for the equipment causing the leak.

#### *Building/Structure Collapse*

If inside:

1. If you are not trapped by the building collapse, free yourself as quickly as possible and move to a safe area away from the collapsed area.
2. If you are trapped by the building collapse, make as much noise as possible to alert other personnel on-site. If able to, call 911.
3. If you can escape the collapse, the First Aider will evaluate injuries and treat the worker until the ambulance arrives.
4. If the supervisor is present, they will contract 911 and or provide immediate transportation to the doctor's office or hospital as required.

If observed:

1. Call 911 immediately.
2. Do not attempt to enter the area.

3. Report your observations to the site supervisor and responding emergency personnel.

### *Mobile Equipment Failure*

If operating the failed equipment:

1. Remain calm. Do not remove your seatbelt.
2. Maintain two-way communication with supervisor and address the failure.
3. Follow supervisor's instructions.

If working around failed equipment:

1. Move unnecessary personnel to a safe zone. Move surrounding equipment out of the way.
2. Maintain two-way communication with operator and assist in navigating equipment.
3. Refer to the manufacturer's instructions based on the equipment for assistance.

### *Powerline Contact*

1. Stay on the equipment. Never touch the equipment and the ground at the same time. Touching anything that is in contact with the ground can be fatal.
2. Keep others away. No one else should touch the equipment or its load, including buckets, outriggers, load lines, and any other part of the machine. Beware of time-delayed relays. Even after breakers are tripped by line damage, relays may be triggered to restore power.
3. Break contact. The operator can try to break contact by moving the equipment clear of the wires while remaining inside the machine. However, that may not be possible if the contact has welded a conductor to the equipment.
4. The supervisor will call the local utility. Stay on the equipment until the utility shuts down the line and confirms that the power is off. Report every incident of powerline contact to the utility - they'll check for damage that could cause the line to fail later.
5. Management to report the contact. If the powerline is rated at 750 volts or more:
  - Report the contact to the inspection department of the Electrical Safety Authority within 48 hours.
  - Provide notice in writing to the Ministry of Labour and the Joint Health & Safety Committee, Health & Safety Representative, and trade union.
6. Since you cannot smell, see, or hear an electric current there is no way for you to determine if fallen power lines are live. Never assume a downed line is safe to touch or to approach. Stay away from them. Tell others to stay away as well. Call 911 to alert emergency crews of the situation.

### *Chemical Spill or Release*

1. Stop work immediately and turn off any machinery/equipment if used.
2. Assess the scene.
3. Isolate the surroundings to prevent anyone from entering the area and remove anyone who may be in the vicinity. Contain the spill using a spill kit.
4. Notify supervisor.
5. If toxic fumes are present, the supervisor will evacuate the building or area immediately.
6. Await further instructions.
7. Refer to the safe job procedure for more details.

### *Fire and Explosion*

If you detect a fire:

1. Back away and assess the danger.
2. Use a fire extinguisher only if safe to do so.
3. Alert co-workers to evacuate the area and remain calm.
4. Sound an alarm (i.e., use pull station, shouting, air horn).
5. Evacuate the building by the nearest safe exit and close doors as you leave.
6. Proceed to the muster point for a headcount.
7. Call 911. Advise supervisor/foreman of observations and location of fire.
8. Remain at the designated staging area until further advised.

When the fire alarm sounds:

1. Assess the hazards.
2. Shut down equipment if safe to do so.
3. Evacuate the building by the nearest safe exit and close doors behind you.
4. Proceed to the muster point for a headcount.
5. Visitors, contractors, etc., are to stay with their host.
6. Advise supervisor/foreman of observations and location of fire.
7. Remain at the designated staging area until further advised.

### *Vehicle Incident*

During a collision resulting in injury:

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

During vehicle trouble:

1. At the first sign of trouble, begin to pull over.
2. Check your mirrors and put on your hazard lights.
3. Never stop in the driving lanes.
4. Exit vehicle through the door away from traffic.
5. Call for help. While you wait for help, stay in your vehicle with the doors locked.

#### *Workplace Violence*

1. Call the police, fire department, paramedics, or the supervisor.
2. Lock yourself in a room/vehicle or evacuate the premises if possible.
3. Wherever possible, it is important to let the harasser or abuser know right away that his or her behaviour is unacceptable and that it must stop immediately.
4. Do not provoke the harasser/abuser.
5. Evacuate the site and follow instructions from first responders or supervisor.

#### *Acts of Terrorism*

1. If gunfire is suspected, immediately hide and be silent. Do not confront them.
2. If the primary route of evacuation is not safe, find an alternate route.
3. Seek refuge in a room, close and lock the door, and barricade the door if it can be done quickly.
4. Switch your phone to silent and text someone to contact 911.
5. If gunfire is suspected outdoors, close windows and be vigilant of your proximity to them.
6. If gunfire is suspected indoors, close and barricade doors. If a window is in the door, stay away from the direct view of it.
7. Once the danger has been cleared, seek medical attention, if required.

#### *Extreme Weather (e.g., tornado, high winds)*

If indoors:

1. Seek shelter underground such as a basement or a safe room.
2. If there is no basement, go to the centre of an interior room on the lowest level away from corners, windows, doors and outside walls.
3. Get under a sturdy piece of furniture and use your arms to protect your head and neck.
4. Do not open windows.

If outdoors:

1. Do not wait until the tornado is visible to get inside.
2. If you cannot seek shelter, lie flat in a ditch or depression and cover your head with your hands.
3. Do not go under an overpass or bridge if nearby. You are safer in a low, flat area.

### *Earthquake*

If indoors:

1. Drop, cover, and hold on. Go under a sturdy piece of furniture, cover your head and hold on.
2. If there is nothing to duck under, crouch in the corner of the room.
3. Stay away from windows to avoid contact with shattered glass.
4. Remain inside until the shaking stops.
5. Use stairs instead of elevators when leaving the premises.

If outdoors:

1. Drop to the ground in a clear spot away from buildings, powerlines, trees and streetlights.
2. Stay away from objects that could fall and injure you, remain still until the shaking stops.
3. Look around for falling tools, equipment or material.

If in a vehicle:

1. Pullover to a safe place and stay inside.
2. Listen to your radio for instructions from emergency officials.
3. Do not leave your vehicle if downed power lines are across it, wait for help.
4. Stay away from anything that could collapse (i.e. buildings, structures, overpasses, underpasses, etc.)
5. Do not move your vehicle until the shaking stops.

### *Flood*

1. Unplug electrical equipment, if safe to do so.
2. Be ready to evacuate as directed.
3. Follow the evacuation routes.

If outdoors:

1. Climb to high ground and stay there.
2. Avoid walking or driving through flood water.
3. If car stalls, abandon it immediately and climb to higher ground.

### *Blizzard*

If indoors:

1. Await instruction from the site supervisor.
2. Stay indoors.

3. Eat and drink. Food provides the body with energy and heat. Fluids prevent dehydration.

If no heat available (i.e., cold temperatures):

1. Close off unneeded rooms or areas.
2. Stuff towels or rags under cracks indoors.
3. Wear layers of loose-fitting, lightweight clothing, if available.
4. Cover windows at night.

If stranded in a vehicle:

1. Stay in your vehicle.
2. Run the motor approximately ten minutes each hour (varies per vehicle). Open the windows slightly for fresh air to avoid carbon monoxide poisoning. Make sure the exhaust pipe is not blocked.
3. Exercise to keep blood circulating and to keep warm.
4. Make yourself visible to rescuers.
5. Turn on the dome light at night when running the engine.
6. Tie a coloured cloth to your antenna or door.
7. Raise the hood after the snow stops falling.

#### *Exposure to Biological Agents*

1. Remain calm and assess the area of biological hazard exposure.
2. Notify the site supervisor immediately.
3. Follow the safe job procedure based on the type of exposure.

#### *Exposure to Contaminated Water*

1. Maintain a clean set of clothes in a dry, secure area.
2. Always wash your hands with clean water, soap and paper towels, before changing clothes, eating, drinking or smoking.
3. Where contamination is heavy, you must always:
  - Shower and change out of work clothes before leaving the job.
  - Never take contaminated clothing home for washing.
  - Maintain shots or boosters for polio, tetanus, diphtheria or hepatitis and other related diseases.

#### *Fall Rescue*

1. Remain calm. Notify the supervisor immediately.
2. The supervisor will sound the emergency alarm to direct employees to stop working.
3. Maintain two-way communication with the employee if possible.

4. Isolate the area to limit exposure and move other employees to a safe zone.
5. Maintain a clear pathway for trained rescue personnel to prepare for rescue.
6. Follow the fall rescue plan based on the site specifications.

### *Impact of Neighbours*

1. Exchange emergency response plans with neighbours.
2. In the case of an emergency, follow their procedures.

## Emergency Equipment

All emergency equipment (first aid kits, AED equipment, rescue ladders, breathing apparatus, etc.) must be in their designated area, well-marked, inspected and maintained as per the manufacturer's guideline.

### *Inspection and Maintenance*

First aid kits must be inspected monthly and replenished in a timely manner after being used. Fire extinguishers must be inspected monthly (Doc # HSE01010009) and certified for re-use at least annually by a third party. Fall prevention equipment will be inspected and certified by a third party on annual basis. Atmospheric gas testers must be inspected and calibrated as per manufacturers guidelines. All emergency equipment should be inspected prior to use.

## Transportation

An injured worker will be transported by ambulance, company vehicle, or their own vehicle depending on the severity of the injury. The first aider on-site will determine the appropriate transportation method. Management will ensure that a vehicle is always available for transporting an injured worker to a medical facility.

The first aider's decisions relating to first aid, the decision to refer the injured person to a medical facility, or the means of transportation to a medical facility cannot be overruled by management.

The injured worker's decision to seek medical treatment and to which facility to receive treatment from cannot be overruled.

## Training

Employees at the office and shop will be trained in the emergency response plan during their orientation. Employees on-site will be trained in the emergency response plan during their site orientation.

Workers who may be in charge of spill response will be required to complete spill response training.

Workers who may be required to use a fire extinguisher will be trained by completing fire extinguisher training.

All supervisors and foremen are required to have First Aid/CPR A + AED training in accordance with the recommendations provided by *St. John Ambulance* and in accordance with Regulation 1101. Additional staff will be appointed to cover each shift in case of absences or if the designated first responder is the one who is injured/ill.

- The trained employee will act as the first aid attendant for the first aid station in their respective shift/workplace.
- The trained employees must have their certificate made available to workers.

If you are not trained to respond to the emergencies listed above, contact trained personnel such as emergency services or certified third parties for assistance.

## Communication

Management will ensure that a means for two-way communication (e.g., two-way radios, telephones, alarms), is available to all workers. Communication of relevant project information and ERPs will be communicated to all persons visiting or working on a project. Any revisions to ERPs will be communicated to all affected workers. Contractors need to review ERPs to ensure all possible emergencies associated with their work are covered and inform management. Periodic reviews of ERPs and response procedures will be reviewed at least annually, and as potential emergencies change.

## Responsibilities

### *Management*

- Review and approve emergency response plans.
- Provide emergency equipment as required.
- Contact appropriate authorities and report incidents when applicable.
- Assist with WSIB claims and follow up with the employees involved after the incident.

### *Supervisors*

- Ensure an emergency response plan is discussed with workers and available on-site.
- Orient all new personnel on the job site to the plan.
- Post emergency response plan on the health and safety board.
- Implement the emergency response plan as a member of site management, in the event of an emergency.
- Ensure first aider is present on site.

- Contact the appropriate personnel for the type of emergency.
- Follow up with worker after the incident.
- Conduct hazard assessment after the incident and implement corrective actions to prevent future incidents from occurring.
- Conduct an incident investigation and report findings to management.

#### *Workers*

- Notify site management immediately of any imminent or present emergency.
- Cooperate with site management in the implementation of the emergency response plan.

#### *First Aid Attendant*

- Provide first aid assistance as required.
- Evaluate injuries and determine the most suitable response for treatment, transport and wellbeing for the worker.
- Stay with the worker until emergency services arrive and provide report.

#### *Joint Health & Safety Committee*

- Assist the supervisor with the emergency response plan.
- Assist the supervisor with incident investigations.

#### **References**

Duties of employers – Occupational Health and Safety Act, s. 25, 26

Duties of constructors – Occupational Health and Safety Act, s. 23

Duties of supervisors – Occupational Health and Safety Act, s. 27

Duties of workers – Occupational Health and Safety Act, s. 28

First Aid Requirements Regulation (O. Reg. 1101) under the Workplace Safety and Insurance Act, 1997



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## Company Policy

*Dust Control*



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## Policy Statement

MGI Construction Corp. will make an effort to ensure public safety, quality of life, and reduce dust exposure that is created from demolition and site work. To reduce dust emissions from human activities and to prevent those emissions from impacting others, this policy is based on the following principles:

*Prevent:* avoid creating dust emissions through good project planning and modifying or replacing dust-generating activities.

*Minimize:* reduce dust emissions with methods that capture, collect, or contain emissions.

*Mitigate:* when preventing fugitive dust or minimizing the impacts are not feasible, alternative measures to mitigate dust will be enacted.

## Scope

The purpose of this policy is to outline the responsibilities of MGI Construction Corp. taking the necessary actions in controlling dust on active sites.

## Definitions

*Fugitive dust:* dust, also known as particulate matter, is made up of solid particles in the air that consist primarily of dirt and soil but can also contain ash, soot, salts, pollen, heavy metals, asbestos, pesticides, and other materials. "Fugitive" dust references particulate matter that has become airborne by wind or human activities and has not been emitted from a stack, chimney, or vent.

### 1. *Health and Environmental Effects*

Dust particles are very small and can be easily inhaled. They can enter the respiratory system and increase susceptibility to respiratory infections and aggravate cardio-pulmonary disease. Even short-term exposure to dust can cause wheezing, asthma attacks, or allergic reactions and may cause increases in hospital admissions and emergency department visits for heart and lung-related diseases.

Fugitive dust emissions can cause significant environmental impacts as well as health effects. When dust from wind erosion or human activity deposits out of the air, it may impact vegetation, adversely affect nearby soils and waterways, and cause damage to cultural resources. Wind erosion can result in the loss of valuable topsoil, reduce crop yields, and stunt plant growth.

## 2. *Safety Hazard and Visibility*

Blowing dust can be a safety hazard at construction sites and on roads and highways. Dust can obstruct visibility and can cause accidents between vehicles, bikes, pedestrians, equipment, vehicles, or site workers. Dust plumes can also decrease visibility across a natural area or scenic vistas.

## 3. *Earthmoving Activities*

Dust emissions from earthmoving activities depend on the type and extent of activity being conducted, the amount of exposed surface area, wind conditions, soil type and moisture content, including:

- Site preparation (clearing, grubbing, scraping)
- Road construction
- Demolition
- Grading and over lot grading
- Excavating, trenching, backfilling and compacting
- Loading and unloading dirt, soil, gravel, or other earth materials
- Dumping of dirt, soil, gravel, or other earth materials into trucks, piles, or receptacles
- Screening of dirt, soil, gravel, or other earth materials

## 4. *Best Management Practices to Control Dust*

Any employee who conducts duties that are a dust-generating activity or source shall implement the following best management practices to prevent off-property transport of fugitive dust emissions:

- *Minimize disturbed area:* plan the project or activity so that the minimum amount of disturbed material or surface area is exposed to wind or vehicle traffic at any one time.
- *Reduce vehicle speeds:* establish a maximum speed limit or install traffic calming devices to reduce speeds to a rate to mitigate off-property transport of dust entrained by vehicles.
- *Minimize drop height:* Drivers and operators shall unload truck beds and loader or excavator buckets slowly and minimize the drop height of materials to the lowest height possible, including screening operations. The same applies to falling demolition debris.
- *High winds restriction:* temporarily halt work activities during high wind events greater than 30 km/h if operations would result in off-property transport.
- *Restrict access:* restrict access to the work area to only authorized vehicles and personnel.
- *Wet suppression:* apply water to demolished materials or pre-wet materials to be demolished as necessary. The same applies to earth materials. Prevent water

used for dust control from entering any public right-of-way, storm drainage facility, or watercourse.

- *Wind barrier*: construct a fence or other type of wind barrier to prevent onsite dust generating materials from blowing offsite.

## References

Duties of employers – Occupational Health and Safety Act, s. 25, 26

Duties of constructors – Occupational Health and Safety Act, s. 23

Duties of supervisors – Occupational Health and Safety Act, s. 27

Duties of workers – Occupational Health and Safety Act, s. 28





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**Company Policy**  
*Inclement Weather*

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## Policy Statement

On occasion, inclement weather may make it difficult for employees to get to work. Employees are expected to make arrangements during periods of inclement weather which will enable them to arrive as soon as possible. MGI Construction Corp. will not penalize an employee for lateness or absence if a genuine effort has been made to get to work. MGI Construction Corp. will ensure that the health and safety of our employees is not compromised by allowing affected employees to leave work depending on the circumstances. No employee will be required to attend for work if it is unsafe to do so.

## Scope

The purpose of this policy is to outline the responsibilities of all members of staff when considering attendance at work during adverse weather conditions and to outline the appropriate procedures.

It is recognized that there will inevitably be occasions when weather conditions are so severe that some employees in outlying areas will either be prevented from getting to their normal place of work or will be late and/or need to leave early.

## Procedure

When an employee is unable to report to work or will be late to work because of inclement weather conditions, the employee shall contact their supervisor or management as soon as possible to advise them of their absence or delay. Normally, the employee will be given the option of:

- using annual vacation leave (if the absence is one-half day or a whole day)
- making up the time
- using lieu time (when applicable)
- taking leave without pay

If MGI Construction Corp. is open and you are unable to attend work as a result of family responsibilities including caring for children as a result of a school closure, you will not be penalized for this absence and you will be offered the same options as noted above.

## Responsibilities

### *Management*

If MGI Construction Corp. is open and severe weather is predicted to happen prior or around the time of business closure, the managers are responsible for determining if the office or site will close and how the employees will be compensated for the closure.

If employees are already at work, managers will check with their direct report to confirm the employee can safely return home.

If clients or customers are in the building when an office or site closes, it is the manager's responsibility to ensure the situation is explained to the customer/client and to inquire if the customer has or can arrange transportation to another location.

Where needed, we will also provide customized emergency information to help an employee with a disability during an emergency.

## Working in Extreme Weather Conditions

The following procedures are recommended for all work in extreme temperature conditions, both hot and cold, and are intended to assist employers, workers, and other workplace personnel in understanding the effects of extreme temperatures on the body and to prevent any such effects in the workplace.

As a general consideration, all persons working in these situations need to be prepared for the possibility of bodily stress due to extreme heat or cold. Extra precautions are necessary to protect against these potentially hostile environments.

The greatest dangers are heat exhaustion or heat stroke and frostbite or hypothermia. Although weather and environmental conditions inside and outside present challenges to working, there is still a need to abide by the health and safety requirements set out in the Occupational Health and Safety Act and the applicable regulations.

### *Working in Extreme Heat*

Working in extreme heat puts stress on a person's cooling system. When heat is combined with other stresses such as hard physical work, loss of fluids, fatigue or some medical conditions, it may lead to heat-related illness, disability and even death.

Anybody working in extreme heat may face these risks. In Ontario, heat stress is usually a concern during the summer. This is especially true early in the season when people are not used to the heat. It is important to understand the symptoms and take preventative measures against heat-related stresses to function effectively in such conditions.

MGI Construction Corp. has a heat stress prevention program that covers:

1. Worker training in the hazards, health effects, and prevention of heat-related illness.
2. Criteria or monitoring method (i.e. acting on heatwave or alert notices by the established news networks or calculating humidex from temperature and humidity measurements or Wetbulb Globe Temperature measurements).
3. A monitoring/sampling plan (i.e., when, where, and what to measure or monitor).
4. Responses or preventative measures (e.g. increase frequency of breaks, reduce the work pace and workload, avoid working in direct sunlight, schedule heavy work for the cooler part of the day, wear hat and sunscreen outdoors).

5. A water supply plan and encouraging hydration (e.g. at least 1 cup every 20 min.).
6. First aid and emergency responses including monitoring of worker symptoms and investigating incidents of health-related illnesses.

#### How to Cope with Heat:

- Workers on medications or with pre-existing medical conditions may be more susceptible to heat stress. These workers should speak to their physicians about working in hot environments.
- It should be noted that heatstroke is a medical emergency and as a result, requires immediate medical attention (an ambulance should be called).
- Other risk factors for developing heat strain besides medical conditions and certain medications are age, gender, history of heat illness, and use of PPE or heavy clothing such as work costumes.

#### *Working in Extreme Cold*

Working in the extreme cold may stress a person's heating system. When cold is combined with other stresses such as hard physical work, loss of fluids, fatigue or some medical conditions, it may lead to cold-related illness, disability and even death.

At very cold temperatures, the most serious concern is the risk of hypothermia or dangerous overcooling of the body. Another serious effect of cold exposure is frostbite or freezing of the exposed extremities such as fingers, toes, the nose or ear lobes. Hypothermia could be fatal in the absence of immediate medical attention.

Warning signs of hypothermia can include complaints of nausea, fatigue, dizziness, irritability, or euphoria. Workers can also experience pain in their extremities (hands, feet, ears, etc.), and severe shivering. Workers should be moved to a heated shelter and seek medical advice when appropriate.

Workers on medications or with pre-existing medical conditions may be more susceptible to hypothermia or overcooling. These workers should speak to their physicians about work in cold environments.

MGI Construction Corp has a cold stress prevention program that covers:

1. Worker training in the hazards, health effects, and prevention of cold-related illness.
2. Criteria or monitoring method (i.e. acting on heatwave or alert notices by the established news networks or calculating humidex from temperature and humidity measurements or Wetbulb Globe Temperature measurements).
3. A monitoring/sampling plan (i.e., when, where, and what to measure or monitor).
4. Responses or preventative measures (e.g. dressing in proper layers of clothing, acclimatizing workers to working conditions and required protective clothing,

establishing a warm-up schedule, provide warm shelter, use of a buddy system, suitable equipment, pace of work to avoid sweating or low activity).

5. A plan to provide warm sweet drinks and soups (increases caloric intake and prevents dehydration which may increase the risk of cold injury).
6. First aid and emergency responses including monitoring of worker symptoms and investigating incidents of cold-related illnesses.

## References

- Duties of employers – Occupational Health and Safety Act, s. 25, 26
- Duties of constructors – Occupational Health and Safety Act, s. 23
- Duties of supervisors – Occupational Health and Safety Act, s. 27
- Duties of workers – Occupational Health and Safety Act, s. 28





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**Company Policy**  
*Subcontractor Management*



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## Objective

To outline the procedure to be taken for every subcontractor at MGI Construction Corp. acting as a project owner. This procedure will ensure that every subcontractor employed by MGI Construction Corp. is committed to working safely.

## Scope

The procedure applies to all subcontractors at MGI Construction Corp.

## Prequalification

Subcontractors must submit the following before arrival on an MGI Construction Corp. construction site:

- Form 1000
- Certificate of Insurance
- WSIB Clearance
- Health, Safety, and the Environment (HSE) Policy and Program
- Workplace Violence and Harassment Statement
- Safety Data Sheet(s) (submitted a minimum 72 hours before product delivery to the site)
- Job Hazard Analysis (e.g., Labour and Material Handling, On-Site and Off-Site Traffic)
- Safe Job Procedures (e.g., Critical Lift Procedure, Working at Heights Rescue Procedure)
- MGI Construction Corp.'s Subcontractor Orientation
- Training records for all workers on-site:
  - Workplace Hazardous Materials Information System (WHMIS) 2015
  - Health and Safety Awareness (Supervisor/Worker)
  - Accessibility for Ontarians with Disabilities Act (AODA)
  - Workplace Violence and Harassment (Supervisor/Worker)
  - Hazard-Specific Training (e.g., Working at Heights, Elevating Work Platforms, Propane Use)

## Site Orientation

Before commencing work on-site, all subcontractor workers must complete MGI's subcontractor orientation. Each worker on-site must be familiar and acknowledge the orientation.

## Requirements While on Projects

Subcontractors must report all incidents that occur while working on an MGI Construction Corp. site. When an investigation is required, the investigation report must be submitted to the site supervisor promptly.

### *Daily*

Subcontractors are required to submit daily job hazard analysis' (JHA) to the site supervisor. The JHA must identify the hazards of their work on that day. If the subcontractor does not have a form to complete, they are to use MGI Construction Corp.'s JHA.

### *Weekly*

Every week, Subcontractors will conduct a documented:

- Toolbox Talk
- Site Inspection

The documents must be submitted to the site supervisor before the end of each week.

## Performance Monitoring

If a subcontractor violates an MGI Construction Corp. health and safety rule, the site supervisor must inform the subcontractor immediately by documenting the incident.

## Responsibilities

### *Management*

- Ensure all required documents are received from subcontractors before their commencement of work.

### *Supervisors*

- Collect required documentation from subcontractors on-site.
- Monitor the subcontractor's performance.
- Issue violations if required.

### *Subcontractors*

- Supply all required documentation before work throughout the project.
- Abide by all MGI Construction Corp. health and safety rules, as well as related legislation.

- Respond to violation documentation promptly.

## References

Duties of employers – Occupational Health and Safety Act, s. 25, 26

Duties of constructors – Occupational Health and Safety Act, s. 23

Duties of supervisors – Occupational Health and Safety Act, s. 27

Duties of workers – Occupational Health and Safety Act, s. 28

Duties of Project Owners – Occupational Health and Safety Act, s. 30





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**Company Policy**  
*Workplace Inspection*



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## Objective

Performing inspections helps to identify sub-standard conditions or practices. Inspections provide the opportunity to correct potential hazards before a loss occurs. Inspections will cover premises, job sites, buildings, temporary structures, excavations, tools, equipment, machinery, methods and practices as applicable.

## Scope

This procedure applies to all MGI Construction Corp. employees who conduct workplace inspections. This procedure covers all operations (office, shop, job sites, etc.)

## Definitions

A workplace inspection is a planned event in which the workplace is inspected to identify potential hazards. It is the best way of proactively identifying hazards before they can cause an injury.

## Guidelines and Standards

At MGI Construction Corp., inspections will be conducted as per the following:

- Manufacturer's recommendations
- Industry regulations and standards
- Legislative requirements

## Procedure

*Site Supervisor:* The site supervisor will perform a weekly inspection of the site. Any deficiencies found must be corrected promptly.

Inspection reports will be reviewed during toolbox safety talks. The inspection reports will be evaluated and monitored by management. Records will be available for review.

*Joint Health and Safety Committee (JHSC):* The JHSC will inspect the physical condition of the workplace monthly. The inspection will be conducted by one worker representative of the JHSC. Management members may take part in the inspection. During the inspection, a minimum of one worker will be interviewed to address any concerns regarding health and safety in the workplace.

The JHSC will send the inspection report to Senior Management and will make any recommendations in writing regarding corrective actions. Senior Management (on behalf of the employer) will review the recommendations and respond within 21 days.

*Health & Safety Representative:* each site Health & Safety Representative will perform an inspection of their site monthly. The site supervisor may accompany the inspector during the inspection if required.

The Health & Safety Representative will send the inspection report to their supervisor and senior management and will make any recommendations in writing regarding corrective actions. Senior Management (on behalf of the employer) will review the recommendations and respond within 21 days.

*Senior Management:* senior management will conduct at least one planned inspection of a job site annually. Appropriate personnel will be notified of deficiencies found, and corrective action will be taken immediately.

*Middle Management:* middle management will conduct at least one planned inspection at a job site every month. Appropriate personnel will be notified of deficiencies found and corrective action will be taken immediately.

*Equipment/Vehicles:* A pre-use inspection will be performed before use for all equipment/vehicles. This will be done by the equipment operator as needed.

According to Ontario Regulation 213/91 sections:

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

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

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

Pre-use inspections will be performed by the worker operating the equipment. Inspections should be performed in accordance with the specific manufacturer's guidelines and the legislation. Standard pre-use inspection checklists will be used for each equipment.

## Inspection Schedule

Type of Inspection	Minimum Frequency	Who
Equipment/Vehicles	Before Use	Equipment operator
Workplace	Weekly	Site supervisor

	Monthly	Health & Safety Representative (may be accompanied by supervisor)
JHSC	Monthly	Worker representative of the JHSC (may be accompanied by a management representative of the JHSC)
Workplace	Annually	Senior management
Workplace	Monthly	Senior management

### First Aid Inspections

- On-site first aid kits will be inspected at least quarterly by management.
- The inspector will examine the first aid kit in their work area and ensure the quantity of supplies meets O. Reg 1101 requirements based on number of employees on-site.
- Any deficiencies or missing items will be reported to management.
- Management will replace the missing or damaged item immediately to comply with O. Reg. 1101.
- The inspector will record the date of the inspection and their acknowledgement on an inspection card in the first aid kit.

### Follow up and Corrective Actions

Identified deficiencies will be corrected immediately, when possible. Corrective actions will be documented. If required, management will be notified of the deficiencies. Workers affected by the hazard must be informed and corrective actions must be taken. Management will monitor the completion of weekly inspections.

MGI Construction Corp. tracks actions resulting from workplace inspections with nonconformity, action description, responsible person, target completion date, actual completion date and verification of the effectiveness of the corrective actions.

Workplace inspections and pre-use inspections for vehicles/equipment/machines/tools are a requirement for all workplace parties responsible for completing them. All documentation for inspections and corrective action plans must be completed and will be stored in records, and accessible on the company's electronic database.

## Communication

The results of workplace inspections will be communicated to workers during toolbox talks or other forms of electronic communication. Monthly inspection forms will be made available to workers. Senior management will review the inspection reports regularly through a tracking system. Any follow-ups on corrective actions will be communicated to relevant personnel.

## Documentation

There are inspection checklists specific to different type of vehicles, equipment, machines, and tools. A general inspection checklist is used for weekly, monthly, and annual workplace inspections. All forms are available through the company's electronic database.

## References

- Construction Projects Regulation O. Reg. 213/91, s. 14, 93, 94
- Duties of employers – Occupational Health and Safety Act, s. 25, 26
- Duties of constructors – Occupational Health and Safety Act, s. 23
- Duties of supervisors – Occupational Health and Safety Act, s. 27
- Duties of workers – Occupational Health and Safety Act, s. 28
- Health and Safety Representative – Occupational Health and Safety Act, s. 8
- Joint Health and Safety Committee – Occupational Health and Safety Act, s. 9



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**Company Policy**  
*Investigations & Reporting*



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## Objective

The purpose of this procedure is to ensure all incidents are reported to supervisors and that investigations are carried out as required. The goal of an investigation is to find the root cause of the incident and develop corrective actions with the ultimate goal of preventing fatalities and to a lesser extent, to prevent the same incident from occurring again. This procedure will also ensure that applicable authorities are informed promptly.

## Scope

Applies to all workplace injuries and employees who are involved in incident reporting and investigating.

## Definitions

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

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

*First aid*: refers to injuries that can be treated on the job without any days lost.

*Incident*: defined as property damage or similar but with no injury to workers.

*Near miss*: a situation in which no injury or damage occurred but may have occurred if conditions had been slightly different.

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

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

- Places life in jeopardy
- Produces unconsciousness
- Results in substantial blood loss
- Involves the fracture of a leg, arm, or fingers, or toes
- Involves the amputation of a leg, arm, hand, foot, or fingers or toes
- Consists of burns to a major portion of the body
- Causes the loss of sight to an eye

## Procedure

### 1. *Transporting the Injured Person*

In the case of a non-critical injury, administer first aid immediately, if possible. If further medical assistance is needed, MGI Construction Corp. will provide transportation to the hospital, doctors, or a medical professional's office or employee's home when necessary. The preferred method of transportation, if required, is by ambulance.

Should this method of transportation not be appropriate, MGI Construction Corp. will call for a taxi. A first-aid certified individual or a designated person will accompany the injured employee.

Should the employee refuse transportation by taxi, MGI Construction Corp. will:

- Identify any other transportation methods that the employee would prefer
- Reiterate the importance of accepting transportation to the hospital, doctor's office or home
- Call 911 and to have an ambulance attendant to administer medical attention at the accident scene
- Not allow the employee to continue work until medical clearance is provided

### 2. *Transporting Companion*

The assisting employee will not be held responsible for any actions taken in good faith to assist the injured employee. Upon arrival at the hospital, the assisting employee will notify their supervisor of the injured employee's status and will continue to do so throughout the day until the situation of the injured employee is stabilized.

### 3. *Incident Reporting*

MGI Construction Corp. is committed to preventing workplace injuries and illnesses. To achieve this, all of the following will be reported:

- Fatality
- Critical Injury
- Lost Time
- Medical Aid
- First Aid
- Occupational Illness
- Property Damage
- Near Misses
- Fire or Explosion
- Environmental Release

Workers must document any of the above and submit it to their supervisor.

The following notification(s) will be done by management when required:

Type of Incident	To	When	How
If a person, whether a worker or not, has been critically injured or killed at the workplace	Ministry of Labour Health & Safety Contact Centre JHSC/Health & Safety Representative or the Union, if applicable	Immediately	By telephone or direct means
	A director of the Ministry of Labour	Within 48 hours	In writing
If an accident, explosion or fire occurs, or if there is an incident of workplace violence and a person is disabled or requires medical attention	A director of the Ministry of Labour, JHSC/Health & Safety Representative or the Union, if applicable	Within 4 days	In writing
If occupational illness or that a claim for an occupational illness has been filed with the Workplace Safety and Insurance Board (WSIB)	A director of the Ministry of Labour JHSC/Health & Safety Representative or the Union, if applicable	Within 4 days	In writing
If the injured worker requires treatment from a health professional (beyond first aid) or is absent from or earns less than regular pay	WSIB by the employer	Within 3 days	In writing (Form 7)
If a worker is injured at work or becomes ill because or because of workplace duties or if a	WSIB by the worker	Immediately	In writing (Form 6)

<p>worker subsequently loses time from work due to a workplace injury/illness</p>			
<p>If the injured worker does not receive health care, requires modified work due to the injury or illness, and has been doing modified work at regular pay for more than 7 days</p>	<p>WSIB by the employer</p>	<p>8th day of modified work</p>	<p>In writing (Form 7)</p>
<p>Serious electrical incidents:</p> <ul style="list-style-type: none"> <li>• Any electrical contact that causes death</li> <li>• Any electrical incidents that cause critical injury</li> <li>• Any fire or explosion or any condition suspected of being electrical in origin which might have caused a fire, explosion, loss of life, critical injury to a person, or damage to property</li> <li>• Any electrical contact with electrical equipment operating at over 750 volts.</li> <li>• Any explosion or fire of electrical equipment operating at over 750 volts</li> </ul>	<p>Ministry of Labour Health &amp; Safety Contact Centre, JHSC/Health &amp; Safety Representative, or the Union, if applicable</p>	<p>Immediately</p>	<p>By telephone or direct means</p>

	<p>Electrical Safety Authority (ESA)</p>	<p>Within 48 Hours</p>	<p>By telephone or direct means</p>
<p>On a project site:</p> <ul style="list-style-type: none"> <li>• A worker falling a vertical distance from any height</li> <li>• A worker becomes unconscious for any reason</li> <li>• Accidental contact by a worker or by a worker's tool or equipment with a live electrical conductor or live electrical equipment</li> <li>• Structural failure of all or part of falsework designed by a professional engineer</li> <li>• Failure of all or part of the structural supports of a scaffold</li> <li>• Failure of a wall of an excavation or similar earthwork for which a professional engineer has given a written opinion that the</li> </ul>	<p>The JHSC, Health &amp; Safety Representative, or the Union, if applicable</p>	<p>Immediately</p>	<p>By telephone or direct means</p>

<p>stability of the wall is such that no worker will be endangered by it</p> <ul style="list-style-type: none"> <li>• Overturning or the structural failure of all or part of a crane or similar hoisting device</li> </ul>	<p>A director of the Ministry of Labour</p>	<p>Within 48 hours</p>	<p>In writing</p>
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#### 4. Incident Investigation

MGI Construction Corp. will investigate the following accidents/incidents:

- Fatality
- Critical Injury
- Lost Time
- Occupational Illness
- Property Damage
- Fire or Explosion
- Environmental Release

In case of a critical injury, the supervisor must secure the scene immediately unless to relieve the person from more suffering or damage to the property. A supervisor will investigate the scene, with the help of the site Health & Safety Representative, Joint Health & Safety Committee, or senior management if required. Documentation must be completed and given to management within 24 hours. Management will then notify the MOL, WSIB, etc. as required.

#### 5. Training

All company employees who may be required to investigate and report an accident/injury must acknowledge and be fluent with accident/injury reporting procedures as per legislative and company standards. To be competent, the worker must have knowledge and experience. Supervisor health and safety awareness and health and safety

representative training is organized by management where applicable and includes training on investigation and reporting procedures.

#### 6. *Basic Investigation Procedure*

The following are procedures to be followed in the event of a workplace incident that requires an investigation:

1. Secure the incident scene and ensure that it is not disturbed.
2. Do not allow similar work to continue until the investigation is completed and corrective actions are in place.
3. Notify management/head office and if on-site, the client and/or constructor immediately.
4. The supervisor must:
  - *Assess the scene*: Inspect equipment/material that was involved in the incident. Ensure that the use of drawings or sketches is made and take photographs of the incident scene indicating sizes, distances, and weights of objects, if applicable.
  - *Interview*: Interview any witnesses and/or people involved. Interviewing should be conducted as soon as possible by the person conducting the investigation and shall be conducted in a private place, away from any commotion.
  - *Root cause*: Determine the root cause of the incident and/or any deficiencies in health and safety practices that contributed. Implement corrective actions to prevent the incident from reoccurring.
5. Provide all the investigation and reporting documentation and/or other information to senior management team for review and distribution.

#### Follow Up and Corrective Actions

The JHSC will review all incident documentation and make recommendations for corrective actions to the employer. The employer will determine if any corrective action(s) can be implemented, and if so, when and how. All corrective and preventative actions, if taken, will be communicated to all personnel through safety meetings, toolbox talks, or posted communications.

Management is responsible for following up on corrective actions to ensure effectiveness. Reviewing the number of incidents and near misses reported after implementing the corrective action plan will determine the effectiveness. Furthermore, monitoring the completion of required safety inspections and toolbox talks to ensure employees are being reminded of safety standards and practices, and have an opportunity to discuss safety hazards or concerns regularly.

## Documentation

There are specific forms available to employees on the company's electronic database. They include Workplace Hazard Report (HSE01010007), Monthly Incident Report (HSE01010010), and Corrective Action Plan (HSE01010012). All completed documentation and investigation findings will be stored on the company's electronic database.

## Responsibilities

### *Senior Management*

- Review investigation reports.
- Implement necessary corrective actions.
- Follow up on corrective actions to ensure effectiveness.
- Notify appropriate authorities as required.

### *Site Supervisor*

- Investigate in a timely manner, if required.
- Complete appropriate documentation and submit it to management.
- Arrange for transportation when needed.

### *Workers*

- Report all incidents/near misses immediately to their supervisor.

### *Joint Health & Safety Committee*

- Investigate and review all incident reports.
- Recommend any corrective action(s) to management.
- Accompany the supervisor during an investigation, if required.

## References

Duties of employers – Occupational Health and Safety Act, s. 25, 26

Duties of constructors – Occupational Health and Safety Act, s. 23

Duties of supervisors – Occupational Health and Safety Act, s. 27

Duties of workers – Occupational Health and Safety Act, s. 28

Health and Safety Representative – Occupational Health and Safety Act, s. 8

Joint Health and Safety Committee – Occupational Health and Safety Act, s. 9



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**Company Policy**  
*Statistics & Review*



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## Objective

At MGI Construction Corp, there is the utmost importance placed on the health, safety and well-being of employees and others who may be affected by daily operations. Protecting employees from injury and other work-related health issues is an ongoing objective. This procedure provides guidelines on organizing, monitoring, and measuring health and safety performance to prevent accidents and injuries.

## Scope

This procedure applies to all supervisors and management at MGI Construction Corp.

## Procedure

### 1. *Weekly*

Supervisors will review data collected on active sites weekly to ensure no obvious trends or occurrences that negatively impact health, safety, or the environment (HSE) are left unresolved.

### 2. *Monthly*

Monthly statistics will be captured for all active projects. The previous week's summary will be populated by the supervisors at the beginning (or end of) each active week of the project to compile this data for a monthly review. The following information is targeted in this summary:

- Daily hazard assessment(s)
- Toolbox talk(s)
- Inspection(s)
- Total hours (employees)
- Disciplinary action(s)
- Incident report(s)

### 3. *Quarterly*

Management will create an HSE summary that incorporates project summaries every quarter. The following information is targeted in this summary:

- First aid treatment(s)
- Incident report(s)
- Insurance claim(s)

Management will review the statistics annually and provide recommendations to senior management.

#### *4. Annual*

Senior management will review the quarterly reports and based on statistical and trend analysis, and corrective action plans, an annual summary will be produced. The following information is targeted in this summary:

- WSIB reports/information
- Non-conformity trends (from the results of weekly site inspections, monthly inspections, hazard reports, etc.)
- Achievement of HSE objectives
- Qualitative data or information

Senior management will review the summary and implement any necessary corrective action(s).

#### *5. Trend Analysis Review*

Senior management will compare 3 years of central HSE data and prepare a trend analysis report, which is to be reviewed in the following annual management meeting. Based on the review, any required corrective actions must identify areas such as:

- Particular areas where training is needed
- Where equipment should be repaired and replaced
- Where a safe work practice should be developed
- Where a specific job task analysis should be undertaken

#### *6. Annual Audit*

The internal auditor will conduct an audit of the HSE program on an annual basis. The audit report will be presented to senior management each year. Annual audit reports must be retained for 3 years. The internal auditor will submit an audit plan of action to management.

#### *7. Action Plan*

Senior management will review the internal auditor's report, annual statistical and trend analysis and develop a corrective action plan. The action plan will address deficiencies identified in the audit report and outline what corrective and preventative actions need to be taken to improve HSE in the organization. The action plan will be made available to employees. Senior management will appoint appropriate individuals to take action based on the action plan. Workers will be informed of the actions taken through postings, memos, toolbox talks, etc.

#### *8. Records and Communication*

Statistical data and reports will be stored in MGI's electronic file database and accessible to management. Data is pulled from the site-specific records in company's electronic file database, WSIB portal, and the fleet telematic device system. An annual newsletter or memo will be sent out to all employees that will include a summary of the year's statistical reports and the corrective actions developed from trends identified.

## Responsibilities

### *Senior Management*

- Review the annual statistics submitted by management.
- Review the audit submitted by the auditor.
- Develop an action plan, appoint individuals to implement corrective actions and communicate the information to all workers.

### *Management*

- Review annual statistics and provide a summary report to senior management.

### *Supervisors*

- Document all accidents, incidents, first aid occurrences, lost time injuries, equipment damage, MOL reports and the Joint Health & Safety Committee minutes.
- Provide the monthly reports to management.
- Complete weekly site safety documentation.

### *Workers*

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

### *Internal Auditor*

- Conduct the audit and submit the report to senior management.

## References

Duties of employers – Occupational Health and Safety Act, s. 25, 26

Duties of constructors – Occupational Health and Safety Act, s. 23

Duties of supervisors – Occupational Health and Safety Act, s. 27

Duties of workers – Occupational Health and Safety Act, s. 28



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**Company Policy**  
*Management Review*



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## Objective

To ensure that senior management is involved in health, safety, and the environment (HSE) activities at MGI Construction Corp. and are actively improving HSE culture.

## Scope

This procedure applies to senior management of MGI Construction Corp.

## Procedure

Senior management of MGI Construction Corp. will conduct an annual review of the HSE program to ensure that continual improvement is being made to the program. The program will be reviewed for sustainability, adequacy, and effectiveness.

### *1. Management Review*

Senior management will schedule an annual meeting to review the HSE program and the performance of it in the previous year.

### *2. Evaluation of the HSE Program*

A review will be done on an annual basis that includes the evaluation of all elements of the HSE program. This may include:

- Internal records (e.g., internal audit report findings, inspections, hazard assessments, incident reports, statistical reporting)
- External communications (e.g., evaluations conducted by an external auditor, evaluations of legal compliance)
- Follow up actions from previous management reviews
- Changing circumstances including developments in legal and other requirements related to HSE (e.g., changes in business conditions, organizational structures, materials and services)
- Annual reviews of policy statements (e.g., Workplace Violence and Harassment)
- An internal audit will be conducted annually using the COR audit tool, and a report will be submitted to senior management.

### *3. Evaluation of HSE Performance*

A review will be done on an annual basis that assesses the HSE performance of the organization and verifies that:

- Key performance indicators have been developed, measured and analyzed to determine the overall HSE performance.

- Comparison from previous statistics are reviewed and any future steps necessary to prevent reoccurrence are implemented.
- The review of the HSE objectives has been performed to determine whether objectives/targets have been met and to what extent.
- Barriers to employee participation and opportunities for improvement have been identified to guide changes to the HSE management system.
- Consultation with employees/Joint Health and Safety Committee to determine areas of improvement for HSE.
- Senior management will compare 3 years of HSE records and prepare a trend analysis.
- The meeting will be documented on the management meeting minutes form (#HSE01010061) and held in records.

#### 4. *Management Review Outcomes*

- Based on the evaluation of HSE Performance, changes are made to the HSE policy and objectives (if applicable). HSE objective outcomes must be measurable.
- Corrective action plans are developed based on changes in policy and objectives. The plan will determine resource allocation, changes to work procedures and documentation requirements.
- Senior Management will appoint appropriate individuals to implement control measures based on the action plan.
- The action plan will be made available to workers. Workers will be informed of the actions taken through postings, memos, toolbox talks, and other effective methods of communication.
- The status of incidents, investigations, corrective action plans will be recorded on a shared document on MGI's electronic database. Management can access the document and review the status at any time.

### Responsibilities

#### *Management*

- Review the annual statistics based on documentation submitted by supervisors and workers.
- Review the audit submitted by the auditor.
- Identify the HSE objectives for the year.
- Develop an action plan and appoint individuals to implement corrective actions
- Communicate relevant information to all workers.

#### *Supervisor*

- Document all incidents, first aid occurrences, lost time injuries, MOL reports, and Health & Safety Representative(s) inspections.
- Provide the monthly reports to management.

### *Workers*

- Cooperate with the auditor during the interview.

### *Internal Auditor*

- Conduct the audit and submit the report to senior management.

### References

Duties of employers – Occupational Health and Safety Act, s. 25, 26

Duties of constructors – Occupational Health and Safety Act, s. 23

Duties of supervisors – Occupational Health and Safety Act, s. 27

Duties of workers – Occupational Health and Safety Act, s. 28





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Company Policy  
*Company Structure*



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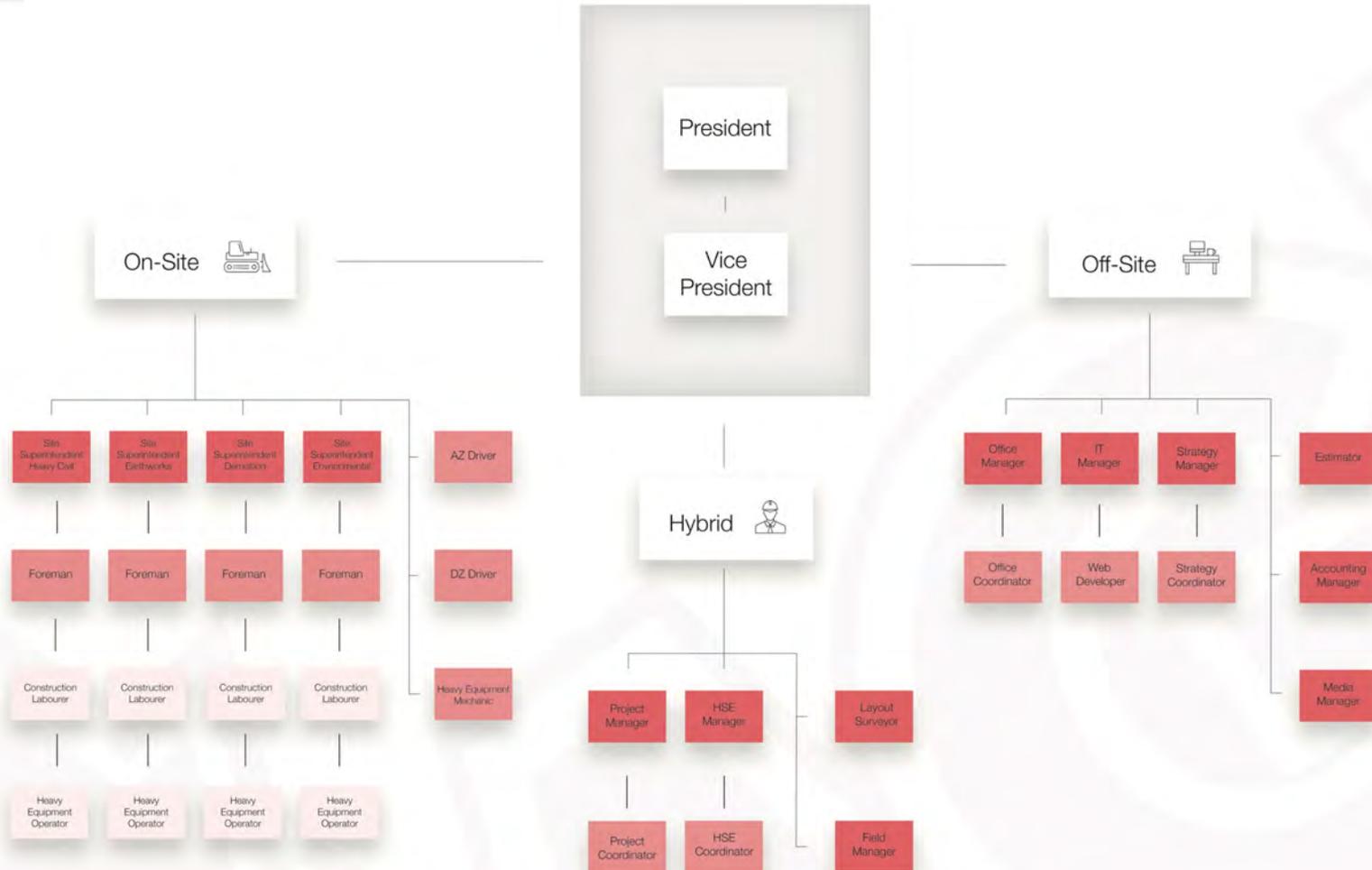


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# COMPANY STRUCTURE





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## 1.0 Executives

### 1.1 President

This position is tasked with providing strong leadership for the company by working with key stakeholders and other executives to establish short- and long-term goals, plans, and strategies. Responsibilities include presiding over the entire workforce, managing budgets, and making sure resources are allocated properly.

### 1.2 Vice President

This role acts as a key leadership figure and manages numerous departments within the organization with the aim of achieving both short- and long-term goals while providing positive results for the company.

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## 2.0 On-Site

These positions spend the majority of their time on-site working to meet client's needs in accordance with the project requirements. Team members may find themselves working on multiple projects at the same time.

### 2.1 Site Superintendent

This position is responsible for leading, directing, and coordinating the day-to-day work of subcontractors, labourers, field engineers, interns, and any other personnel that is present on the site. Site superintendents are responsible for ensuring safety protocol, schedule delivery, quality of work performed on-site, and budget allocation are aligned with MGI's standards and company objectives. The hours of work will consistently range from 40 to 50 hours per week, (7 am–5 pm) depending on the contract and timeline—overtime, weekends and/or evenings also may be required with regards to the aforementioned.

#### *Responsibilities*

- Develop sound strategies that identify and mitigates risks and maximizes opportunities to ensure all financial targets, including budgets, forecasts, and profitability levels are met
- Administer contracts, subcontracts, purchase orders, site instructions and change notices to ensure scopes, terms, and conditions are properly executed
- Identify and advise of design deficiencies, schedule interruptions or difficulties, and any other project issues that may arise

- Ensure the compliance of all Federal, Provincial and local laws, particularly applicable Occupational Health & Safety Acts/Construction Safety Act regulations and environmental requirements
- Mentor project team members, ensuring career growth and development.
- Review, understand and abide by the contract and subcontracts of the project

### *Qualifications*

- Reliable transportation, such as a G-license
- Transparent and direct communication
- A love for the outdoors: summer through winter
- Leadership in health, safety, and environmental protection
- Experience within the industry
- Active collaboration with project stakeholders
- Complex problem-solving and critical thinking
- Strong organizational and interpersonal skills
- Possess a valid or be willing to obtain the following certifications: WHIMIS, Elevated/Aerial Work Platform, Working at Heights/Fall Arrest

### *Reporting Structure*

- President
- Vice President
- Field Manager

#### 2.2 Foreman

The position is required to be involved and supportive of day-to-day operational and disciplinary decisions. The site foreman is accountable for following project plans and schedules and ensuring that crews under his/her direction perform daily and weekly activities to meet production goals. The hours of work will consistently range from 40 to 50 hours per week, (7 am–5 pm) depending on the contract and timeline—overtime, weekends and/or evenings also may be required with regards to the aforementioned.

### *Responsibilities*

- Using equipment, placing materials accurately and according to drawings and/or direction
- Operating skid steers, mini excavators and occasionally heavy equipment
- Digging ditches or trenches, backfilling excavations, or compacting and levelling the earth to grade specifications, using picks, shovels, and other tools
- Guarantee all safety precautions and quality standards are met
- Removing rubble and other debris at job sites

- Report on progress to managers, engineers, etc.
- Supervise the use of machinery and equipment
- Signal equipment operators to facilitate alignment, movement, or adjustment of machinery, equipment, or materials
- Supervise and train workers and tradespeople

#### *Qualifications*

- Reliable transportation, such as a G-license
- Strong communication and learning ability
- Manual dexterity in operating gas-powered handheld equipment
- A love for the outdoors: summer through winter
- Good physical condition
- A keen awareness of safety protocol
- Experience within the industry
- Possess a valid or be willing to obtain the following certifications: WHIMIS, Elevated/Aerial Work Platform, Working at Heights/Fall Arrest

#### *Reporting Structure*

- Vice President
- Field Manager
- HSE Manager

### 2.3 Construction Labourer

This position may be placed in one or all of these divisions depending on specialization, contextual demand, and/or preference. The construction labourer position is physically demanding and involves being outdoors for the majority of the day in all types of weather. Construction labourers benefit from natural job rotation, physical activity, and partake in a wide variety of on-site assignments which are essential to project completion. The hours of work will consistently range from 40 to 50 hours per week, (7 am–5 pm) depending on the contract and timeline—overtime, weekends and/or evenings also may be required with regards to the aforementioned.

#### *Responsibilities*

- Using equipment, placing materials accurately and according to drawings and/or direction
- Operating skid steers, mini excavators and occasionally heavy equipment
- Digging ditches or trenches, backfilling excavations, or compacting and levelling the earth to grade specifications, using picks, shovels, and other tools
- Performing demolition, excavation, and compaction activities
- Removing rubble and other debris at job sites

- Physical demolition and/or abatement
- Performing site preparation and clean-up duties
- Signal equipment operators to facilitate alignment, movement, or adjustment of machinery, equipment, or materials
- Control traffic that passes through, near, or around the work zones

### *Qualifications*

- Reliable transportation, such as a G-license
- Strong communication and learning ability
- Manual dexterity in operating gas-powered handheld equipment
- A love for the outdoors: summer through winter
- Have their own safety footwear
- A keen awareness of safety protocol
- Experience within the industry
- Possess a valid or be willing to obtain the following certifications: WHIMIS, Elevated/Aerial Work Platform, Working at Heights/Fall Arrest

### *Reporting Structure*

- Site Superintendent
- Field Manager
- Foreman

## 2.4 Heavy Equipment Operator

This position is responsible for the safe and efficient operation of heavy equipment and may be placed in one or all of these divisions depending on specialization, contextual demand, and/or preference. Heavy equipment operators benefit from natural job rotation and partake in a wide variety of on-site assignments which are essential to project completion. The hours of work will consistently range from 40 to 50 hours per week, (7 am–5 pm) depending on the contract and timeline—overtime, weekends and/or evenings also may be required with regards to the aforementioned.

### *Responsibilities*

- Inspect heavy equipment prior to use to ensure that mechanical and safety systems are in good working order
- Operate heavy equipment such as wheel loaders, excavators, bobcats, bulldozers, screening plants, crushing plants and/or stackers to excavate, move, crush, screen and load gravel, concrete, asphalt, or dirt
- Operate various attachments as assigned (e.g. grapple, magnet, and pulveriser etc.)
- Communicate defects or unsafe conditions to supervisor in a timely manner to facilitate prompt correction

- Understand and follow the approved plan for the current construction project
- Park the equipment in a safe manner when not in use
- Fill out and understand an equipment and duty log book

### *Reporting Structure*

- Site Superintendent
- Field Manager
- Foreman

## 2.5 AZ Driver

This position will work across all of these divisions and may include travelling to and from multiple destinations in one day—overnight stays are not required. The AZ truck driver position is responsible for packing, bulking, loading, securing, and transporting various equipment, construction materials, and/or waste materials. The hours of work will consistently range from 40 to 50 hours per week, (7 am–5 pm) depending on the contract and timeline—overtime, weekends and/or evenings also may be required with regards to the aforementioned.

### *Responsibilities*

- Load, unload and/or haul equipment, large pieces of debris from sites and yard
- Complete reports such as driver logbooks and inspection reports
- Ensure safety and security of cargo and overseeing the condition of the vehicle by inspecting tires, lights, brakes, and other equipment on a frequent basis
- Safely transport and operate various pieces of heavy/medium equipment being delivered and be able to explain its operations
- Promptly report any delays due to breakdowns, weather, traffic conditions, or any other problems relating to timely pickups or delivery of equipment
- Ensure the truck is clean and organized on a regular basis ◊ Abide by all rules and laws of the road
- Fill the vehicle with fuel at the end of every day

### *Qualifications*

- Valid AZ license with clean abstract and CVOR
- Familiarity with the operation of heavy equipment
- Manual dexterity in operating gas-powered handheld equipment
- Ability to diagnose and report truck functioning
- A keen awareness of safety protocol
- Experience within the industry
- Ability to operate class D vehicles as well

- Possess a valid or be willing to obtain the following certifications: WHIMIS, Elevated/Aerial Work Platform, Working at Heights/Fall Arrest

### *Reporting Structure*

- Vice President
- Field Manager
- Site Superintendent

## 2.6 DZ Driver

This position will work across all of these divisions and may include travelling to and from multiple destinations in one day. The DZ truck driver position is responsible for transporting waste material, dirt, aggregates, or similar from construction sites. You may also be required to deliver/drop-off waste bins, storage containers, and/or site offices. The hours of work will consistently range from 30 to 50 hours per week, (7 am–5 pm) depending on the contract and timeline—overtime, weekends and/or evenings also may be required with regards to the aforementioned.

### *Responsibilities*

- Load, unload and/or haul equipment, large pieces of debris from sites and yard
- Complete reports such as driver logbooks or inspection reports
- Ensure safety and security of cargo and overseeing the condition of the vehicle by inspecting tires, lights, brakes, and other equipment on a frequent basis
- Abide by all rules and laws of the road and those established at dump location
- Safely transport and operate various pieces of heavy/medium equipment being delivered and be able to explain its operations
- Safely operate roll-off hoist system on and off the truck (i.e., dumping and loading)
- Fill the vehicle with fuel at the end of every day
- Ensure the truck is clean and organized on a regular basis
- Promptly report any delays due to breakdowns, weather, traffic conditions, or any other problems relating to timely pickups or delivery of materials/goods

### *Qualifications*

- Valid DZ license with clean abstract and CVOR
- Familiarity with the operation of heavy equipment
- Verbal communication skills
- Spatial awareness, sense of direction
- Ability to diagnose and report truck functioning
- A keen awareness of safety protocol
- Experience within the industry
- Possess a valid or be willing to obtain the following certifications: WHIMIS, Elevated/Aerial Work Platform, Working at Heights/Fall Arrest

### *Reporting Structure*

- Vice President
- Field Manager
- Site Superintendent

## 2.7 Heavy Equipment Mechanic

This position ensures that our operators have functioning equipment through the effective inspection, service and maintenance of our heavy equipment fleet. As a heavy equipment mechanic, you will be responsible for inspecting engines and equipment, caring out services, conducting repairs and completing routine maintenance tasks for our heaving equipment fleet. The hours of work will range from 40 to 65 hours per week, depending on the amount of work available — overtime, weekends and/or evenings also may be required with regards to the aforementioned.

### *Responsibilities*

- Inspecting trucks, cranes, bulldozers and other heavy equipment for proper functioning
- Diagnosing faults using computerized testing equipment
- Adjusting equipment and replacing faulty parts.
- Repairing damaged equipment parts
- Cleaning, lubricating and conducting routine services on heavy-duty vehicles.
- Cleaning and servicing machine attachments such as winches, blades and side booms
- Performing major repair work when necessary
- Consulting with other mechanics on smaller jobs
- Reporting damaged or faulty equipment to management

### *Qualifications*

- Certification as a heavy equipment mechanic
- Proven work experience as a heavy equipment mechanic
- Understanding of computer testing and diagnostic technologies
- Ability to lift heavy machinery
- Extensive knowledge of diesel engines and construction equipment
- Ability to work after-hours if required
- Good communication skills
- Good organizational skills

### *Reporting Structure*

- Vice President
- Field Manager

- Site Superintendent
- 

## 3.0 Hybrid

These positions balance their time between on- and off-site project work. Team members may find themselves working on multiple projects at the same time.

### 3.1 Project Manager

This position shapes the experience of a site visitor through effective layout, styles, and This position is responsible for leading, directing, and coordinating the daily management of the assigned project(s). This is a leadership position and entails the accountability for the overall performance of the project including costs, schedule, quality, project status, and adherence to company policies and procedures. Project managers will advocate for successful team collaboration and help develop future construction professionals. The hours of work will consistently range from 40 to 50 hours per week, (7 am–5 pm) depending on the contract and timeline—overtime, weekends and/or evenings also may be required with regards to the aforementioned.

#### *Responsibilities*

- Create a project and financial forecast while identifying and managing opportunities and risks to achieve the best possible impact on schedule and financial targets Create and abide by a project schedule in conjunction with milestone dates and ensure that these dates are met and followed
- Establish and manage a project budget, in addition to billings and working alongside accounting to ensure timely payments
- Maintain, track, and report financials and overall project performance weekly, monthly and quarterly
- Ensure that projects are built according to plans, specifications, and drawings
- Manage the procurement process which includes subcontractor, trade and supplier negotiations and awards.
- Work with a pre-construction team in developing project rollout

#### *Qualifications*

- Reliable transportation, such as a G-license
- Transparent and direct communication
- Fluency in technology and accompanying programs such as MS Office, AutoCAD, experience with project management systems
- Attention to detail
- Leadership in risk evaluation, contract negotiations, pricing decisions
- Experience within the industry
- Active collaboration with project stakeholders

- Complex problem-solving and critical thinking
- Strong organizational and interpersonal skills
- Possess a valid or be willing to obtain the following certifications: WHIMIS, Elevated/Aerial Work Platform, Working at Heights/Fall Arrest
- Construction related degree/s or equivalent/s

### Reporting Structure

- President
- Vice President
- Strategy Manager

### 3.2 Project Coordinator

This position is responsible for assisting project manager(s) in leading, directing, and coordinating the daily management of the assigned project(s). This is a leadership position and entails the accountability for the overall performance of the project including costs, schedule, quality, project status, and adherence to company policies and procedures. Project coordinators will advocate for successful team collaboration and help develop future construction professionals. The hours of work will consistently range from 40 to 50 hours per week, (7 am–5 pm) depending on the contract and timeline—overtime, weekends and/or evenings also may be required with regards to the aforementioned.

#### *Responsibilities*

- Create a project and financial forecast while identifying and managing opportunities and risks to achieve the best possible impact on schedule and financial targets Create and abide by a project schedule in conjunction with milestone dates and ensure that these dates are met and followed
- Establish and manage a project budget, in addition to billings and working alongside accounting to ensure timely payments
- Maintain, track, and report financials and overall project performance weekly, monthly and quarterly
- Ensure that projects are built according to plans, specifications, and drawings
- Manage the procurement process which includes subcontractor, trade and supplier negotiations and awards.
- Work with a pre-construction team in developing project rollout

#### *Qualifications*

- Reliable transportation, such as a G-license
- Transparent and direct communication
- Fluency in technology and accompanying programs such as MS Office, AutoCAD, experience with project management systems
- Attention to detail

- Leadership in risk evaluation, contract negotiations, pricing decisions
- Experience within the industry
- Active collaboration with project stakeholders
- Complex problem-solving and critical thinking
- Strong organizational and interpersonal skills
- Possess a valid or be willing to obtain the following certifications: WHIMIS, Elevated/Aerial Work Platform, Working at Heights/Fall Arrest
- Construction related degree/s or equivalent/s

### *Reporting Structure*

- Project Manager
- HSE Manager
- Site Superintendent
- Field Manager

### 3.3 HSE Manager

This position is responsible for protecting MGI employees and the public at large. You will achieve this by inspecting, investigating, reviewing and assessing project sites, operations, and procedures to ensure compliance and legal requirements with current Safety Program, Environmental, and Occupational Health & Safety laws and regulations. You will be responsible for influencing, developing, and implementing a comprehensive safety strategy aimed at our corporate goal of zero incidents. The hours of work will consistently range from 30 to 40 hours per week, (9 am–5 pm) depending on varying contracts and timelines—overtime, weekends and/or evenings are typically not required.

### *Responsibilities*

- Conduct safety training both to office and site employees and sub-contractors
- Write safety proposals, interpret regulations, develop training, draft inspection standards and safety assessment tools aimed at continual improvement
- Ensure hazard assessments and site-specific health & safety requirements are being completed prior to project start-up and on an ongoing basis as required
- Assist in the preparation and maintenance required to obtain COR Certification.
- Develop an annual budget and assist in the purchasing of PPE supplies
- Assist in resolving any issues of non-compliance
- Develop, implement, and provide training on emergency response rescue and evacuation plans
- Regularly monitor safety compliance of workers and subcontractors; conduct site inspections and institute remedial action if required

### *Qualifications*

- Reliable transportation, such as a G-license

- Transparent and direct communication
- Have proficient knowledge of the Ontario Occupational Health and Safety Act and Regulation for Construction Projects, WHMIS Regulation, Workplace Safety and Insurance Act, The Ontario Traffic Manual Book and COR Internal Auditor
- Attention to detail
- Experience or knowledge of WCB legislation and claims management
- Thorough understanding of OHS Regulations and Codes
- Fluency in technology and accompanying programs such as MS Office©
- Degree/s or equivalent
- Possess a valid or be willing to obtain the following certifications:
- JHSC Members, NCSO, OHS, CRSP

### *Reporting Structure*

- President
- Vice President
- Strategy Manager

### 3.4 HSE Coordinator

This position is responsible for assisting in HSE management by protecting MGI employees and the public at large. You will achieve this by inspecting, investigating, reviewing and assessing project sites, operations, and procedures to ensure compliance and legal requirements with current Safety Program, Environmental, and Occupational Health & Safety laws and regulations. You will be responsible for influencing, developing, and implementing a comprehensive safety strategy aimed at our corporate goal of zero incidents. The hours of work will consistently range from 30 to 40 hours per week, (9 am–5 pm) depending on varying contracts and timelines—overtime, weekends and/or evenings are typically not required.

### *Responsibilities*

- Conduct safety training both to office and site employees and sub-contractors
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### *Qualifications*

- Reliable transportation, such as a G-license
- Transparent and direct communication
- Have proficient knowledge of the Ontario Occupational Health and Safety Act and Regulation for Construction Projects, WHMIS Regulation, Workplace Safety and Insurance Act, The Ontario Traffic Manual Book and COR Internal Auditor
- Attention to detail
- Experience or knowledge of WCB legislation and claims management
- Thorough understanding of OHS Regulations and Codes
- Fluency in technology and accompanying programs such as MS Office®
- Degree/s or equivalent
- Possess a valid or be willing to obtain the following certifications: JHSC Members, NCSO, OHS, CRSP

### *Reporting Structure*

- HSE Manager
- Project Manager
- Field Manager

## 3.5 Layout Surveyor

This position leverages modern technological advancements in surveying methods to ensure the accurate and efficient marking of coordinates or reference points as per the project's drawings/models. The surveyor position is responsible for staking out reference points and markers that guide the construction project's new structures (or related) with pinpoint accuracy. The hours of work will range from 35 to 50 hours per week, (7 am–5 pm) depending on varying contracts and timelines—overtime, weekends and/or evenings are typically not required.

### *Responsibilities*

- Surveying the land to determine precise location and measurement of points, researching survey evidence, developing new data, maintaining accurate notes and coordinate findings
- Plan, organize, and direct the work of one or more survey parties engaged in
- surveying the land to determine precise location and measurements of points, elevations, lines, area and contours for projects
- Provide technical information to company supervisors, clients, or other personnel
- to ensure findings reported comply with engineering standards and other site requirements

- Research previous survey evidence, maps, deeds, physical evidence, and other records to obtain data needed to perform and/or maintain survey
- Conduct As-Built surveys for verification purposes
- Inspect work for conformance to design drawings
- Coordinate inspections with consultants and authorities

### *Qualifications*

- Reliable transportation, such as a G-license
- Strong verbal communication and organizational skills
- Knowledge of land usage and physical geography
- Effectively transmit knowledge within the team
- A love for the outdoors: summer through winter
- Negotiation skills
- Experience within the industry
- Construction related degree/s or equivalent
- Possess a valid or be willing to obtain the following certifications:
- WHIMIS, Elevated/Aerial Work Platform, Working at Heights/Fall Arrest

### *Reporting Structure*

- Project Manager
- Site Superintendent
- Field Manager

#### 3.6 Field Manager

This position oversees the entire operational/regional area and is responsible for coordinating field employees to cover all project requirements within a particular area. Logistics, scheduling, project management, employee and client relations are all typical duties for this role. The hours of work will range from 45 to 50 hours per week, (7 am–5 pm) depending on varying contracts and timelines—overtime, weekends and/or evenings may be required.

### *Responsibilities*

- Coordination of field employees
- Hiring and training employees in the field
- Interviewing of job candidates and arrangement of orientation and other new hire employer obligations
- Project management and coordination duties
- Regular performance evaluation of all field employees
- Generate reports addressing any issues and highlighting strengths and weaknesses of the field team

- Cleaning and servicing machine attachments such as winches, blades and side booms
- Performance and management of fleet maintenance programs such as budgeting or care
- Reporting damaged or faulty equipment to staff for repair or replacement

#### *Qualifications*

- Project management certification and/or experience
- Computer skills including word and work sheet processing
- Understanding of computer testing and diagnostic technologies.
- Time management and scheduling awareness
- Extensive knowledge of diesel engines and construction equipment.
- Ability to work after-hours if required
- Good communication skills
- Good organizational skills

#### *Reporting Structure*

- President
- Vice President
- Strategy Manager

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## 4.0 Off-Site

These positions spend the majority of their time off-site working to act as a support role to meet the project requirements. Team members may find themselves working on multiple projects at the same time or else handling new or closing current projects.

### 4.1 Office Manager

This position is responsible for handling clerical tasks in our office headquarters. Office assistants handle incoming phone calls and other communications, greeting client's and visitors; as well as managing files, updating paperwork and other documents, and performing other general office clerk duties and errands. The hours of work will consistently range from 30 to 40 hours per week, (9 am–5 pm) depending on varying contracts and timelines—overtime, weekends and/or evenings are typically not required.

#### *Responsibilities*

- Oversee monthly and quarterly assessments and forecasts of our firm's financial performance against budget, financial, and operational goals; oversee short and long-term financial and managerial reporting

- Develop, maintain, and monitor accounting systems and procedures; capture all billings and receipts for the recording of revenue transactions
- Ensure that all Employee timesheets are completed prior to month-end
- Ensure various reports including Accounts Payable (A/P) invoices, expense reports, and payroll reports are completed
- Supervise and assess the workload of administrative staff and operations
- Assist with proof-reading and testing activities on larger projects
- Perform special projects (as assigned)

### *Qualifications*

- Reliable transportation, such as a G-license
- Strong communication
- Negotiation and pricing decisions
- Active collaboration with project stakeholders
- Agile
- Strong organizational and interpersonal skills
- Bilingual (English/French)
- Mature judgement handling sensitive information
- Risk management
- Fluency in technology and accompanying programs such as MS Office
- Degree/s or equivalent

### *Reporting Structure*

- President
- Vice President
- Strategy Manager

## 4.2 Office Coordinator

This position is responsible for handling clerical tasks in our office headquarters. Office coordinators handle incoming phone calls and other communications, greeting client's and visitors; as well as managing files, updating paperwork and other documents, and performing other general office clerk duties and errands. The hours of work will consistently range from 30 to 40 hours per week, (9 am–5 pm) depending on varying contracts and timelines—overtime, weekends and/or evenings are typically not required.

### *Responsibilities*

- Answer the main office phone line, screen calls, and route incoming calls
- Handle and distribute incoming and outgoing mail or material within the company

- In a cordial manner, greet and provide exceptional customer service to MGI's clients
- Provide administrative and office support to executives and team members
- Maintain customer confidence and protect operations by keeping information confidential
- Assist in the planning and preparation of meetings and conference calls
- Maintain an adequate inventory of office and various supplies and inventory
- Provide word-processing, scanning, secretarial support, documentation preparation, and enterprise resource planning support to our team
- Co-ordinates, plans, and manages office services, such as accommodations and transportation
- Perform special projects (as assigned)

### *Qualifications*

- Reliable transportation, such as a G-license
- Transparent and direct communication
- Autonomy in task orientation
- Active collaboration with project stakeholders
- Attention to detail
- Strong organizational and interpersonal skills
- Managing and prioritizing tasks effectively
- Mature judgement handling sensitive information
- Fluency in technology and accompanying programs such as MS Office
- Degree/s or equivalent

### *Reporting Structure*

- Office Manager
- Strategy Manager

## 4.3 IT Manager

IT managers are responsible for coordinating, planning, and leading computer-related activities within the organization. This position determines the IT needs of the organization and is responsible for implementing computer systems to fulfill the organization's information systems requirements. The hours of work will range from 35 to 45 hours per week, (9 am–5 pm) depending on varying contracts and timelines—overtime, weekends and/or evenings are typically not required.

### *Responsibilities*

- Lead IT projects, including the design and deployment of new IT systems and services

- Monitor performance of information technology systems to determine cost and productivity levels, and to make recommendations for improving the IT infrastructure
- Help define IT infrastructure strategy, architecture, and processes
- Analyze business requirements by partnering with key stakeholders across the organization to develop solutions for IT needs
- Assess vendors and develop test strategies for new hardware and software
- Troubleshoot hardware and software issues related to internal IT
- Develop and maintain file storage, backup, and cyber security

### *Qualifications*

- Strong verbal communication and organizational skills
- Mastery of data process and storage programs
- Experience leading and managing large IT projects and rolling out IT infrastructures across various technologies
- Excellence in computer systems, security, network and systems administration, databases, data storage systems, and cellular networks
- Ability to recognize patterns/trends in large data sets
- Excellent project management skills and ability to prioritize
- Degree/s or equivalent/s

### *Reporting Structure*

- President
- Vice President
- Strategy Manager

#### 4.4 Web Developer

This position shapes the experience of a site visitor through effective layout, styles, and features. The web developer position is responsible for creating a responsive, user-friendly, easily navigated, and aesthetically pleasing website for visitors to interact with. The hours of work will range from 5 to 10 hours per week, (flexible hours) depending on varying contracts and timelines—overtime, weekends and/or evenings are typically not required.

### *Responsibilities*

- Write and maintain web applications
- Perform routine and regular maintenance, including security functions on the website
- Follow and implement industry accepted best practices and tools

- Code and deploy applications in a cross-platform, cross-browser functionality
- Actively seek new programming knowledge/expertise
- Aid our marketing team with any WordPress/PHP customizations
- Work actively to create innovative new platform and applications

### *Qualifications*

- Strong verbal communication and organizational skills
- Innovative mindset
- Understanding of digital photography/videography principles
- Mastery of digital creative software
- Mature judgement handling sensitive information
- Attention to detail
- Experience with PHP, HTML5 CSS, JQuery, Javascript, Python, or WordPress Front end frameworks
- Degree/s or equivalent/s

### *Reporting Structure*

- IT Manager
- Office Manager
- Strategy Manager

#### 4.5 Strategy Manager

This position is responsible for the effective creation and communication of a clear strategic vision for the business. Duties include defining focused tactical and strategic agendas that enhance the business and working closely with executive leadership at all fronts of the business with a clear emphasis on key strategic initiatives for the business. The hours of work will range from 40 to 60 hours per week, (flexible hours) depending on varying contracts and timelines—overtime, weekends and/or evenings may be required.

### *Responsibilities*

- Coaching leadership and management at all fronts through strategy development and the achievement of sustainable efficiencies
- Productivity improvements, improved resource allocation, resource productivity, strengthening of risk controls, and improved consumer experience.
- Anticipate risk scenarios, develop suitable risk management strategies, and establish mitigation measures in the event that such scenarios should occur.
- Establish KPIs that facilitate the analysis/measurement of the business's performance against overall goals, objectives, targets, and budgets.
- Design strategies that fundamentally redesign the businesses operating models that are failing to achieve target returns.

- creates and drives inspiring and collaborative productivity capabilities for strategy formulation.

### *Qualifications*

- Reliable transportation, such as a G-license
- Strong verbal communication and organizational skills
- Mastery of data process and visualization programs
- Clear knowledge transmission throughout company
- Influential leadership
- Strong people skills
- Experience with strategy formation and implementation
- Degree/s or equivalent/s

### *Reporting Structure*

- President
- Vice President

#### 4.6 Strategy Coordinator

This position is responsible for assisting strategy manager(s) with the effective creation and communication of a clear strategic vision for the business. Duties include defining focused tactical and strategic agendas that enhance the business and working closely with executive leadership at all fronts of the business with a clear emphasis on key strategic initiatives for the business. The hours of work will range from 40 to 50 hours per week, (flexible hours) depending on varying contracts and timelines—overtime, weekends and/or evenings may be required.

### *Responsibilities*

- Coaching leadership and management at all fronts through strategy development and the achievement of sustainable efficiencies
- Productivity improvements, improved resource allocation, resource productivity, strengthening of risk controls, and improved consumer experience.
- Anticipate risk scenarios, develop suitable risk management strategies, and establish mitigation measures in the event that such scenarios should occur.
- Establish KPIs that facilitate the analysis/measurement of the business's performance against overall goals, objectives, targets, and budgets.
- Design strategies that fundamentally redesign the businesses operating models that are failing to achieve target returns.
- creates and drives inspiring and collaborative productivity capabilities for strategy formulation.

### *Qualifications*

- Reliable transportation, such as a G-license
- Strong verbal communication and organizational skills
- Mastery of data process and visualization programs
- Clear knowledge transmission throughout company
- Influential leadership
- Strong people skills
- Experience with strategy formation and implementation
- Degree/s or equivalent/s

### *Reporting Structure*

- Strategy Manager
- IT Manager
- HSE Manager

#### 4.7 Estimator

This position analyzes the costs associated with performing new construction project/s and relatedly prepares reports and/or estimates regarding the project/s. The estimator position is responsible for accurately controlling and studying the information related to the project/s and reporting these figures in a timely manner. The hours of work will range from 30 to 50 hours per week, (9 am–5 pm) depending on varying contracts and timelines—overtime, weekends and/or evenings are typically not required.

### *Responsibilities*

- Prepares estimates of probable costs of materials, labour, and equipment by studying plans; updating specifications; identifying and projecting costs
- Evaluates offers to purchase by costing changes, additions, and site requirements
- Set up cost monitoring and reporting systems and procedures
- Obtains bids from vendors and subcontractors by specifying materials; identifying qualified subcontractors; negotiating price
- Resolves cost discrepancies by collecting and analyzing information
- Liaise, consult and communicate with engineers, architects, owners, contractors and subcontractors
- Advise on tendering procedures, examine and analyze tenders, recommend tender awards and conduct negotiations
- Prepares special reports by collecting, analyzing, and summarizing information and trends
- Prepare and maintain a directory of suppliers, contractors and subcontractors

### *Qualifications*

- Reliable transportation, such as a G-license
- Attention to detail
- Fluency in technology and accompanying programs such as MS Office, AutoCAD, experience with project management systems
- Mastery of data process and visualization programs
- Negotiation skills
- Effective in creating and performing presentations
- Active collaboration with project stakeholders
- Experience within the industry
- Construction related degree/s or equivalent/s

### *Reporting Structure*

- Project Manager
- Site Superintendent
- Vice President
- Strategy Manager

### 4.8 Accounting Manager

This position is responsible for overseeing the accounting department with a focus on ensuring the timely and accurate delivery of financial statements and reporting. Accounting managers generally have several direct reports and work to allocate tasks evenly across the team. The hours of work will consistently range from 30 to 40 hours per week, (9 am–5 pm) depending on varying contracts and timelines—overtime, weekends and/or evenings are typically not required.

### *Responsibilities*

- Preparing and/or reviewing appropriate ledger entries and reconciliations
- Maintaining the general ledger system
- Preparing monthly, quarterly and annual financial statements; assisting with regulatory reporting as applicable
- Report risk issues to company management
- Preparation and updating of weekly cash flow statements
- Researching accounting issues for compliance
- Coordinating the budget process
- Establishing and enforcing proper accounting methods, policies and principles

### *Qualifications*

- Reliable transportation, such as a G-license
- Transparent and direct communication

- Autonomy in task orientation
- Attention to detail
- Knowledge of federal, provincial, and local requirements regarding financial records
- Managing and prioritizing tasks effectively
- Mature judgement handling sensitive information
- Skills in budget preparation and analysis techniques
- Fluency in technology and accompanying programs such as MS Office®
- Degree/s or equivalent

### *Reporting Structure*

- Field Manager
- Office Manager
- Strategy Manager
- Project Manager
- President
- Vice President

### 4.9 Media Manager

This position promotes our brand through the development and execution of marketing campaigns which include social media, influencers, content production, and more. The media relations manager position is responsible for implementing a stable brand strategy that constantly looks for innovative ways to engage with clients, investors, our staff, and the community. The hours of work will range from 15 to 30 hours per week, (flexible hours) depending on varying contracts and timelines—overtime, weekends and/or evenings are typically not required.

### *Responsibilities*

- Identify opportunities to enhance the effectiveness of media, research best practices, monitor media trends, and share insights
- Foster relationships with key media outlets to increase awareness of our company, our past, current, and future projects
- Assist with the development of strategic communications plans for projects in Canada
- Manage, update, and post news releases and relevant content on our website
- Successfully pitch, secure and provide counsel to internal leadership for various press opportunities
- Foster relationships with key media outlets to increase awareness of current company directed projects
- Strategically manage and coordinate messaging and content for social media platforms

### *Qualifications*

- Reliable transportation, such as a G-license
- Strong verbal communication and organizational skills
- Creativity and enthusiasm
- Understanding of digital photography/videography principles
- Mastery of digital creative software
- Mature judgement handling sensitive information
- Attention to detail
- Experience within the industry
- Degree/s or equivalent/s

### *Reporting Structure*

- Strategy Manager
- Strategy Coordinator
- Field Manager





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January 30, 2024



**Company Policy**  
*Inspection & Testing Plan (ITP)*



11 Dansk Court  
Etobicoke, ON  
M9W 5N6



416-675-2280



416-675-2209



admin@mgicorp.ca



## Objective

The purpose of inspection and testing is to ensure that products and services are adequate for their intended purpose. Inspection and testing plans are the operational parts of quality control, which outline the standards required to ensure that products and services are specified in a manner that meets or exceeds the client's expectations and achieves objectives set out in the agreement.

## Scope

Inspection and testing can be performed before, during, and after manufacturing, installation, or during the maintenance phase to ensure that the quality level of the product or service is within acceptable standards. All procedures outlined below may or may not apply to the contracted work.

## Definitions

*Construction Certificate:* means a certificate in the detailed form in compliance with municipal, provincial, federal, and/or associations relevant to the inspection, testing, or related.

*Environmental Management System:* means planning for environmental management that covers all activities, products, and services related to the project. This includes the development, implementation, and maintenance phases and shall monitor, update, expand, and manage environmental components until the completion of the project or further where required.

*Inspection:* activities such as measuring, examining, testing, or gauging one or more characteristics of a material, procedure, product, or service and comparing this with the specified requirements.

*Inspection and Testing Plans (ITP):* documents that identify the inspection and testing requirements of the contract.

*Project Management Team:* all internal personnel responsible for the delivery of the project.

*Quality Assurance:* refers to all planned and systematic activities implemented within the quality program and demonstrated as needed, to provide adequate confidence that products and services will fulfill the contractual requirements for quality.

*Quality Control:* refers to activities such as inspections, examinations, testing, or reporting to verify that quality requirements have been attained.

*Third-party Inspection:* a service provided by any recognized independent agency to oversee the inspection and testing of products, services, materials, or people, whenever required by the client or his representative.

## Procedure

MGI Construction Corp. will be responsible for the execution of all of the construction works executed by its staff and its subcontractors or suppliers and shall ensure that all subcontractors or suppliers comply with our quality assurance/quality control (QA/QC) policy—prepared and implemented under the specific requirements of the project and in connection with the activities covered by that party's contract—or provides evidence of the subcontractor's or supplier's quality system and that this meets or exceeds the standards required for their awarded scope of work. The project manager is responsible for developing, along with support from the project management team(s), the detailed inspection and testing plans (ITP) to feature all of the inspection(s) and test(s) required to ensure the construction complies with the design and applicable standards.

### 1. *Independent Inspection and Testing*

The following elements of the works will be inspected and tested by qualified independent inspection and testing companies, all may not apply to the individual program:

- *Structural:* strip and spread footing; cast in place concrete reinforcement; pre-stressed/post-tensioned concrete; structural steel; and steel deck.
- *Architectural:* roofing and roof waterproofing testing (e.g., electro field vector mapping testing for sheet membrane roofing if used in slope for platform waterproofing); complete roof deck assembly; waterproofing in tunnels and all underground structures; air quality testing; air leakage testing; fire stop and smoke seal field inspection and testing; testing of cladding systems; and testing of building envelope.
- *Civil:* earthwork and subgrade; manholes, pipes, conduits; waterproofing for underground structures; re-bar, concrete and precast manufacture; utilities trenching, installation, and subbase; and hydrant flow test.
- *Track Work:* track bed earthwork and subgrade; track bed drainage and drainage systems; installation of manholes, culverts, pipes, conduits; complete rail laying including track layout, verification and certification of complete rail geometry by qualified surveyor; rail metallurgy testing and certification; welding testing and certification; rail joints, conventional and insulated; joint bars, joint track bolts, tie plates and ties; all components of switches, switch heaters and operations mechanics; and continuous welded rail installation under the rail company's track standards.
- *Mechanical:* air balancing; air quality testing (LEED), testing and commissioning of HVAC equipment including heating and chilled water flow and air handling units; building automation system (BAS); and fire protection system.
- *Electrical:* transformers factory testing, including testing for resistance measurements, ratio, polarity and phase relationship, exciting current and losses

on rated voltage and 110% of rated voltage impedance and load loss, applied and induced potential, pressure testing, core insulation testing, insulation power factor testing, testing transformer by energized five consecutive times at 110% of rated voltage, providing certification that the fully assembled transformer is suitable for full-field vacuum filling, and confirmation with test data that the impedance changes occurring during testing do not exceed the values required during testing of circular coil designs.

- *Surge Protection:* device testing including an independent laboratory verifying by NEMA LS1 surge current rating on both per mode and per phase basis using the IEEE C 62.41, 8x20 microsecond current wave (test data must be on a complete SPD with internal fusing in place—test data on an individual module is not acceptable); distribution panels testing; motor control panel testing; generators load testing; fire alarm system testing; and SCADA instrumentation and control systems.

## 2. *Samples and Mock-Ups*

Mock-ups will be prepared for the project work specifically requested below and as required under the aesthetics program for all finishes and colours for all structures for review by contracting authority along with appropriate persons with reasonable promptness and in an orderly sequence, so as not to cause any delay in the works.

Mock-up and sample requirements, installations, and the approval process are established in the construction specifications. In general, mock-ups and samples will be included in corresponding ITPs as hold point items requiring the obligatory presence of the contracting authority and appropriate persons to release it. MGI Construction will not proceed with the work without the proper release/approval. Evidence of release(s)/approval(s) will be documented.

If it is determined that the mock-up of the system or assembly does not meet performance and aesthetic program requirements, the contracting authority may request the removal and provision of a new mock-up, at no extra cost.

As a minimum, MGI Construction may provide mock-ups for elements such as:

- tiling including floor, wall, and grout
- concrete floor finishing including floor joint, saw-cut, sealer and finishes
- exterior cladding (architectural masonry, grout, curtain wall, sill, sealant, flashing)
- cladding systems (expanded mesh, steel wire mesh, composite aluminum and other similar features)
- all other systems that are included in the quality management plan

As a minimum, MGI Construction may provide installed samples or samples that are of reasonable sizes to determine compliance and fulfillment of the aesthetic design program for the following:

- waterproofing systems for roof and tunnels
- preformed and factory painted sheet metal work
- curtain wall, glass, and insulated glazing
- louvers
- stainless steel elements such as wall protection, corner protection, and other similar concepts
- ceiling elements such as acoustic tiles, metal ceiling, platform, and other similar concepts
- floor and wall tiles, roof material
- polycarbonate surface panels (grade separation)
- colors

### 3. *Inspection and Test Plans (ITP's)*

MGI Construction develops and implements inspection and test plans (ITP) for each applicable element in the works to ensure that requirements for testing or inspection are planned, timely, and systematically performed. ITP's at a minimum contain the following information:

- a description of the inspection, testing, and monitoring activity
- frequency of inspections, tests, and monitoring
- reference to standards, codes, specifications, and acceptance criteria
- reports and checklists
- personnel responsible for inspection, testing, and monitoring activity
- quality assurance review, witness and hold points
- description and frequency of geotechnical instrumentation monitoring and adherence to acceptance criteria

### 4. *Inspection Planning*

The project manager will prepare and maintain an ITP schedule. The ITP schedule will identify when a witness or hold point will acknowledge the following:

- fabrication or manufacturing of elements of the works at off-site locations
- the first implementation of any ITP by a particular subcontractor
- any inspection or test that will be conducted outside the hours of 8:00 am–5:00 pm Monday to Friday and any activities occurring on Saturday, Sunday or Statutory Holidays

The ITP schedules will be issued at the beginning of each week. The project manager will notify MGI and/or representatives of changes to the inspection schedule promptly and issue updated schedules as necessary. At pre-construction meetings, the project manager reviews and discusses the content of the ITPs to ensure proper coordination with subcontractors, inspection and testing agencies, and the project management team. Depending on the scope of work of certain construction packages and at the discretion of

the project manager and/or the quality assurance/quality control manager, special or additional meetings may be warranted for additional ITP communications.

It is the sole responsibility of the project manager to ensure that ITPs and any associated checklists are available before commencement of a particular element of the work and that all responsible parties in the ITP are aware of the requirement and acceptance criteria, as well as the sequencing of the inspection and testing activities.

As ITP items are carried out, records such as test reports, checklists, materials, and product data sheets, mix designs, etc., are generated as objective evidence of their execution. These records shall indicate whether the acceptance criteria in the ITP have been met and in case it has not been met, it should be a sufficient paper trail to resolve this matter, i.e. re-testing, re-inspection, or the issuance of a non-conformance statement.

The project manager is responsible for tracking the status of ITPs against the construction schedule progress and to ensure that supporting documentation and records are complete, accurate, and in compliance with administrative and control of document policies.

Upon completion of ITPs, the project manager must conduct a general review to ensure completeness, the preparation of a closing package, that missing information is requested, and that parties are informed about the completion of the ITP.

Materials Safety Data Sheets (MSDS) of all the hazardous materials proposed for use before the commencement of works and during the full project term must be provided and updated as necessary. All materials must meet and comply with the Province of Ontario's occupational health and safety regulations. This function is under the direct responsibility of MGI's health and safety management.

#### 5. Accreditation Standards

All on- and off-site calibrations, samples, mock-ups, tests, and trials will be carried out by laboratories that are duly accredited for the carrying out of such calibrations, samples, mockups, tests, and trials. Laboratory accreditation shall be in accordance with ISO/IEC 17025, as amended, updated or replaced from time to time, provided that, for specific activities, the contracting authority may accept other industry-recognized accreditation in place of ISO/IEC 17025, including:

- *Concrete and Concrete Materials*: CSA A283 00, "Qualification Code for Concrete Testing Laboratories", to the appropriate category for the tests being done.
- *Structural Steel and Welding*: CSA W178.1 02, "Certification of Welding Inspection Organizations", to the level appropriate for the inspection being carried out.
- *Aggregates, Bituminous Paving Mixtures*: "Canadian Council of Independent Laboratories", as appropriate to the work being carried out.
- *Protective Coatings*: "National Association of Corrosion Engineers", as appropriate to the work being carried.
- *Systems Testing*: "Underwriters Laboratories of Canada."

- *Railway/Track*: American Railway Engineering and Maintenance-of-Way Association (AREMA), GO Transit Track Standards, as well as Transport Canada Grade Crossing Standards and Regulation.

Where a material, component, or assembly is required to be fire-rated, the fire rating will be as determined or listed by one of the following testing authorities acceptable to Governmental Authorities:

- Underwriters' Laboratories of Canada (ULC)
- Underwriters' Laboratories Inc. (UL - USA)
- Factory Mutual Laboratories (FM - USA)
- The National Research Council of Canada (NRC);
- The National Board of Fire Underwriters (NBFU - USA)
- Warnock Hersey/Intertek Testing Services (WH / WHI)

Request for approval from the contracting authority will be sought in case other industry-recognized accreditations are proposed to be used (not listed here) if such other accreditation applies to the contract for which it is proposed and meets the intent of ISO/IEC 17025.

## 6. *Certificates*

Design and construction certificates will be issued, confirming the design team has followed the appropriate protocol and that the work submittal complies with the approved variations and schedule of requirements in the project agreement.

### Design Certificates

When requested, MGI Construction will prepare and submit separate design certificates to accompany submitted construction document submittal review packages at 60%, 90%, and 100% submissions (recommended).

All design certificates prepared and issued by MGI Construction shall be:

- referenced to the applicable design certificate (e.g., general, environmental)
- signed and sealed by the responsible professional (e.g., professional engineer, registered architect) from the design firm responsible for the generation of the design drawings
- signed by the project representative
- signed in clear and distinguishable writing with name, position, and accompanying organization on the design certificate

### *Construction Certificates*

When requested, MGI will prepare and submit construction certificates at substantial completion and total completion to the contracting authority representative for review.

All construction certificates prepared and issued by MGI Construction will be:

- signed by the construction contractor representative
- signed and sealed by the responsible professional (e.g., professional engineer, registered architect, principal of the design team) from the design firm responsible for the generation of the design drawings
- signed by the project representative
- signed by the independent certifier, acknowledging receipt
- signed in clear and distinguishable writing with name, position, and accompanying organization on the construction certificate
- recorded with date and time stamps

#### *7. Permits, Licences, Approvals, and Agreements (PLAA)*

The project manager is responsible for obtaining all the required construction permits, licences, approvals, and agreements (PLAA) concerning inspection and testing procedures. This includes the preparation of a PLAA specification, the maintenance of a PLAA ledger to track acquisition progress, and the maintenance of the conditions of the approval register to track regulatory compliance. Work will be scheduled accordingly around the PLAA. Work methods and ITP will incorporate activity items in a form of preconditions or hold points to ensure compliance and updating of PLAA.

MGI Construction will conduct the work in compliance with regulatory agency requirements and legislation including Federal and Provincial Acts and Regulations and Municipal By-Laws. Compliance with legal requirements is also an objective. PLAA will be identified for each term of the project. All obtained PLAA will be maintained in an accessible location in the event of an inspection, audit, or request.

#### *8. Monitoring and Inspection*

Construction monitoring and inspection will be used to ensure that the construction works are completed in compliance with the ITPs. Construction project management staff will complete daily construction reports on work activity to verify that the ITPs are being implemented and followed. This team will also identify any deficiencies and verify corrective actions are properly implemented. Where monitoring or inspection activities reveal the presence of a non-conformance, the project manager shall initiate a non-conformance statement or report (or similar).

#### *9. Deficiency Tracking*

The project manager is responsible for tracking and ensuring the identification and resolution of deficiencies or else related issues discovered during inspection and monitoring and that these identified construction issues are resolved with the appropriate corrective actions. The project manager may make use of electronic deficiency tracking

tools collaboratively with MGI Construction personnel and subcontractor representatives to communicate efforts to identify and resolve the issues noted above.

## Responsibilities

### *Contracting Authority*

- Assume overall responsibility for compliance with all aspects of applicable law relating to compliance with inspection and testing.
- Provide clear and decisive instructions and or specifications regarding quality standards.

### Contractor

- Promptly report to the Contracting Authority in writing and before proceeding with any readily apparent deficient work.
- Perform necessary adjustments to rectify deficiency with the scope of work.
- Perform work in accordance with listed and known quality standards.

### *Project Manager*

- Evaluate and interpret manuals, blueprints, specifications along with other technical data.
- Interact effectively and professionally with all customers.
- Prepare procedures, update and maintain files as needed by ISO certification and quality enhancement.
- Update and maintain inspection documents, forms, logs, conformance certificates, and other records.
- Identify the root cause of problems, analyze and develop remedial actions working with the project management team.
- Complete appropriate documentation and submit it to management.

### *Inspecting Authority*

- Verify conformance to applicable procedures and other approved documents.
- Provide acceptance or rejection for compliance with established standards and processes.
- Utilize precision measuring tools to assist in receiving inspection.
- Perform dimensional, visual, electrical, and mechanical inspection using standard documentation and procedures.

## References

ISO 9001:2000

ISO 14000

ISO/IEC 17025

CSA Group – Construction and Infrastructure Standards

National Electrical Manufacturers Association (NEMA)





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**Company Policy**  
*Groundwater Management/Dewatering Plan (GMDP)*



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## Objective

The purpose of this policy is to describe the general principles and strategies for groundwater management and dewatering aspects of projects; to describe and quantify where groundwater management and or dewatering activities are expected; to describe the proposed approvals for the dewatering activities; to describe the protocols and processes including monitoring and contingency plans for the dewatering activities; and to describe the reporting framework to document the groundwater management and dewatering activities.

## Scope

Applies to all projects where groundwater management/dewatering is required or else recommended. Not included in this policy are requirements for managing surface water and requirements to meet recommendations for dewatering approach(es) (i.e., sump versus well points) outlined in geotechnical investigations. Dewatering techniques will be determined after consultation(s) with the dewatering contractor(s).

## Definitions

*Water taking (dewatering):* governed in Ontario by the Ontario Water Resources Act (OWRA), the Water Taking and Transfer Regulation, Ontario Regulation (O. Reg.) 387/04, and, as of 2016, has been amended by O.Reg. 63/16 and 64/16. Section 34 of the OWRA and O.Reg. 63/16 state that water takings for construction site dewatering between 50,000 L/day and 400,000 L/day require registration of the water taking on the Environmental Activity and Sector Registry (EASR), where the takings are expected to be greater than 400,000 L/day, a Permit to Take Water (PTTW) is required. O. Reg. 64/16, provides exemptions from water taking permitting assuming that conditions of the exemption are adhered to and all other required regulatory approvals are obtained.

*Treatment and discharge:* Section 53 of the OWRA states that no person shall use, operate, establish, alter, extend or replace new or existing sewage works except under and in accordance with an environmental compliance approval (ECA), this is related to treatment if required and to discharge of dewatering effluent to the natural environment.

*Conservation Authority Act (CAA):* The Conservation Authority Act provides regulation and direction for conservation, restoration, development, and management of natural resources in watersheds in Ontario. More specifically, a voluntary review process under O. Reg. 166/06: Toronto And Region Conservation Authority: Regulation of Development, Interference with Wetlands and Alterations to Shorelines and Watercourses, will be engaged as per site or contract requirements.

*Sewer use bylaws:* provide regulations on the option of discharging dewatering effluent to sewers (stormwater management facility) at the project site.

## Procedure

### 1. *Principles/Strategy*

The general principles and management strategy that will be applied for managing groundwater and dewatering activities are to responsibly manage the groundwater beneath the site while completing the goals of the project.

Principles and overall management strategy include but are not limited to the following:

- Sufficient characterization of the site to understand the existing conditions such that reasonable predictions of how the proposed construction will affect the existing conditions and the requirements needed to support the construction (i.e., dewatering).
- Select a design and construction strategy that will not waste the valuable resource of groundwater and reasonably limit potential impact(s) to the natural system including where possible, utilizing water taking to offset impacts from dewatering.
- Conduct sufficient planning and prepare documents to effectively communicate the design and strategy to those involved in the project.
- Obtain and manage all required permits for the proposed construction operation.
- Require sufficient reporting to ensure compliance with the design, strategy, and any permitting.

### 2. *Existing Site Conditions*

As part of the project bidding/award phase, several investigations including hydrogeological, geotechnical, and environmental are to be obtained to provide the background information used to characterize the site. Further to the aforementioned, such reports may include:

- Hydrogeological Investigation
- Geotechnical Reports
- Environmental Assessment
- Groundwater Monitor Installation Drawings
- Groundwater Monitor Reports

### 3. *Dewatering Activities*

The method(s) of dewatering (or depressurization) is contingent on the recommendations of the dewatering contractor—provided that the approach complies with the dewatering policies outlined here, regulations, and lastly, meets the requirements for maintaining stability as per recommendations from the geotechnical investigations. It is recommended that for all applicable excavation activities, the contracting authority will also prevent surface water runoff from entering the excavation areas. Surface water diversion around proposed construction areas is to be provided where excavation areas are of sensitive (or similar) nature.

#### 4. *Water Taking Activities*

Water taking is to be complete by registering the water takings on the Environmental Activity and Sector Registry (EASR). A permit to take water (PTTW) is to be obtained to permit water taking associated with the construction included in the contract and the associated areas works. The PTTW shall be reviewed by all contractors conducting water taking activities such that they understand the permitted rates and the conditions of the PTTW.

#### 5. *Water Taking Activities (Exempt)*

Stormwater management in the form of unwatering a shallow excavation of precipitation water (above the groundwater level) will be required from time to time to maintain a dry construction site. According to the Ontario Water Resources Act under Ontario Regulation (O. Reg.) 63/16, if the taking is 100% stormwater, then the taking is exempt from the requirement of registering an EASR. This principle may be applied even after a PTTW has been obtained for the groundwater dewatering.

Surface water management in the form of an active instream diversion (bypass pumping) will also be required to maintain a dry construction site. According to the Ontario Water Resources Act under Ontario Regulation (O. Reg.) 64/16, this is not considered water taking and the activity is exempt if the following conditions are met:

- water is being diverted to create and maintain a dewatered work area located in a water body for a construction-related project by means of a pump
- water taken from the water body is returned directly to the same water body—the water cannot be stored or used for any other purpose
- there cannot be an introduction of a visible petroleum hydrocarbon film or sheen present in the returned water
- the water quantity and quality cannot be affected upstream or downstream of the work area
- no pump is refueled within 30 meters of the water body
- erosion and sediment control measures are:
  - used during the return of the water to the water body
  - used, operated, and maintained in accordance with recommendations provided by the manufacturers of the control measures
  - are recovered and disposed of, along with all materials collected or trapped by those measures, when the water is no longer being taken

According to the *Water Taking and Transfer User Guide: Clarifications and Exemptions*, this exemption applies to both the diverted water in the water body and any water from the water body that is enclosed within the construction site due to water leaking from the water body.

While the taking is exempt, it is expected that standard erosion and sediment control measures will be applied to this activity and the discharge water quality and location shall

be monitored in the field by conducting inspection(s) to ensure that the discharge water quality is acceptable. As an exempt activity, it should be noted that this type of monitoring does not include measuring and recording the discharge rate or discharge water quality sampling/analysis.

## 6. Discharge

Discharge locations can serve as assessment tools of the expected discharge water quality and treatment requirements. Groundwater quality sample results can be obtained to provide a proxy for discharge quality. However, this does not account for changes in water quality due to flow across open excavations, newly constructed surfaces or construction activities, or entrainment of total suspended solids in sumps and other water pumping locations. It is also possible that different water qualities may be encountered due to large scale dewatering activities drawing in groundwater from areas outside the site that was not encountered during the investigation phase. Concentration limits can be determined by the sewer bylaws and background conditions of the discharge location.

### Potential Impact(s)

The potential impact(s) from dewatering may include impacts to the local ecosystem (e.g., surface water and wetland area), impacts to other groundwater users, and settlement and land subsidence impacts. To mitigate the effects of dewatering and discharge, industry-accepted dewatering and water treatment practices must be followed, and all project agreement requirements and regulations will be adhered to.

### Monitoring and Reporting

Monitoring during construction is expected to be required based on the anticipated conditions of environmental approvals (e.g., Ministry of the Environment, Conservation, and Parks), in addition to the specified monitoring requirements in the contracted works. Exceedances of the pumping rate or groundwater chemistry issues that impact dewatering disposal, or issues encountered (such as higher than expected dewatering rates), should be reported to the contracting authority immediately.

As may be required under the project agreement, all records including groundwater levels, groundwater chemistry results, daily discharge volumes, discharge chemistry results, the treatment used, and the information related to the discharge receptor(s) will be under a formal report system. Accordingly, volumes and rates may be required to be submitted to the Ministry of the Environment, Conservation, and Parks.

## Sample Figures

### Parameter Lists

Type of Parameter	Parameter	Limit	Units
Conventional	Biochemical Oxygen Demand (BOD)	15	mg/L
	Total Kjeldahl Nitrogen	1	mg/L
	Phenolics (4AAP)	0.008	mg/L
	Phosphorous (Total)	0.4	mg/L
Metals	Arsenic (Total)	0.02	mg/L
	Mercury	0.0004	mg/L
	Silver (Total)	0.12	mg/L
Organics	Benzene	2	ug/L
	Cis-1,2 -dichloroethylene	5.6	ug/L
	Tetrachloroethvlene	4.4	ug/L
	Toluene	2	ug/L
	Di-n-butyl phthalate	15	ug/L
	PCBs	0.4	ug/L

Type of Parameter	Parameter	Units
Physical Tests	Conductivity	mS/cm
	pH	pH units
	Total Suspended Solids	mg/L
Anions and Nutrients	Chloride (Cl)	mg/L
	Fluoride (F)	mg/L
	Total Kjeldahl Nitrogen	mg/L
	Phosphorus, Total	mg/L
Total Metals	Aluminum (Al)	mg/L
	Copper (Cu)	mg/L
	Lead (Pb)	mg/L
	Manganese (Mn)	mg/L
	Mercury (Hg)	mg/L
	Titanium (Ti)	mg/L
	Zinc (Zn)	mg/L

## Responsibilities

### *Contracting Authority*

- Submit a general plan of the proposed dewatering scheme to the Ministry of Environment, Conservation and Parks and obtain a Permit to Take Water (PTTW) at least one month in advance of dewatering activities.
- The plan shall include but is not limited to showing the following: location of generators or other noise-producing equipment, including anticipated decibel levels; distance between dewatering equipment and new/existing structures; and the location of dewatering equipment in relation to the excavation.
- Review of the dewatering system by the contracting authority shall not relieve the contractor of responsibility for the adequacy of the plan for supplying all labour, equipment, and materials necessary for satisfactory dewatering of excavations.
- All drilled wells, drive points, boreholes, and dewatering wells shall be constructed in accordance with Ont. Reg. 128/03.

### *Dewatering Contractor*

- Employ a Professional Engineer (P.Eng.) licensed to practice in the Province of Ontario to evaluate the possibility of uplift or settlement of any structure, pipeline, or utilities.
- Inform the contracting authority of the possibility of uplift or settlement and take all necessary precautions to prevent uplift or settlement.
- Employ a professional dewatering specialist (professional engineer or professional geoscientist) to design, construct, and maintain all dewatering measures except trench sump operations to ensure all structures and pipes are constructed in the dry. If the contractor chooses to use his/her own forces to perform dewatering, s/he shall provide evidence as to being qualified.
- Follow all Ministry of Labour (MOL) regulations regarding work near hydro lines and gas utilities.
- Obtain all required approvals from the MOE's Surface Water Branch and the local Conservation Authority for the discharge of pumped groundwater to nearby watercourses.
- Protect all excavations against flooding and damage due to surface runoff.
- Dewatering Specialist shall be licensed by the MOE according to Ontario Regulation 128/03 if wells are to be drilled.

## References

Ontario Water Resources Act – Ontario Regulation (O. Reg.) 63/16  
Ontario Water Resources Act – Ontario Regulation (O. Reg.) 64/16  
Ontario Water Resources Act – Ontario Regulation (O. Reg.) 128/03  
Government of Ontario – Environmental Activity and Sector Registry  
Government of Ontario – Permits to Take Water  
Government of Ontario – Water Taking and Transfer User Guide: Clarifications and Exemptions





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January 30, 2024



**Company Policy**  
*Soil & Excavated Material*



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## Objective

To describe how MGI Construction Corp. will address the management of excavated material (i.e., soil and solid waste, including contamination).

## Scope

This policy applies to the handling, transportation, testing, disposal, and/or ultimate disposal of excavated material generated as part of project work.

## Definitions

*Contaminants of Concern (CoCs)*: known or unknown contaminants in the soil's makeup.

*Best Management Practices (BMP)*: guidelines outlining the management of excess soil align or greater than those provided by the Ministry of the Environment, Conservation and Parks.

*Electrical Conductivity (EC)*: soil classification outlining the conductivity of electricity.

*Excess Soil*: soil that has been excavated, mainly during construction activities, that cannot or will not be reused at the site where the soil was excavated and must be moved off-site.

*Petroleum Hydrocarbons (PHC)*: soil classification outlining the petroleum hydrocarbons.

*Qualified Person(s)*: professional geoscientists and professional engineers; someone who can exercise professional judgment based on his or her experience in order to advise on appropriate reuse options for the excavated soil or excess soil, and make these decisions based on appropriate analysis and characterization of the soil.

*Receiving Site*: the site/project which receives source site material for a beneficial purpose.

*Sodium Adsorption Ratio (SAR)*: soil classification outlining the sodium adsorption ratio.

*Soil*: unconsolidated naturally occurring mineral particles and other naturally occurring material resulting from the natural breakdown of rock or organic matter by physical, chemical, or biological processes that are smaller than 2 millimeters in size or that pass the US #10 sieve.

*Source Site*: the site/project where the soil is excavated.

*Temporary Storage Soil Site*: owned or leased by the owner/operator of the Source Site or Receiving Site for temporary storage of the excess soil.

*Toxicity characteristic leaching procedure (TCLP)*: a soil sample extraction method for chemical analysis employed as an analytical method to simulate leaching through a landfill.

## Procedure

The following main items are to be performed in compliance with federal, provincial, and municipal regulations (see Ministry of the Environment, Conservation and Parks [MECP]):

- General principles for managing soil and excavated materials.
- Over-arching soil and excavated materials management strategy, in terms of sustainable principles and compliance with regulatory requirements and best practices.
- Protocols for characterizing soil and excavated materials and determining management and disposal requirements.
- How soil and excavated materials will be temporarily staged, stored, or subsequently transferred for off-site disposal with regards to potential environmental effects and impacts to human health and safety.
- Methods for minimizing the quantity of material requiring excavation and management.
- Methods to maximize the re-use of excavated material.
- Procedures for testing and characterizing the excavated material.
- How excess soil and excavated material generated through project work will be managed using best management practices.
- How areas of known site conditions and contamination will be assessed and managed, including a general plan for the remediation of unknown contamination.
- Procedures for determining suitable source sites for imported materials and what analytical testing will be completed on imported materials.
- Reporting procedures to document how management activities and best practices have been implemented.

### 1. *Assessment Criteria*

The following assessment criteria must be used for the evaluation of excess soils and/or contaminated soil:

- *Table 1 Full Depth Background SCS*: for all types of property use, except agricultural, (Table 1 SCS). Table 1 SCS is applicable when assessing excess soil for off-site management when the receiving site type is unknown.
- *Table 2 Generic SCS*: in a potable groundwater condition for industrial/commercial/community (I/C/C) property use (Table 2 SCS). Table 2 SCS would generally be applicable to assess the suitability of reuse of soils on-site in a potable groundwater condition.
- *Table 3 Generic SCS*: in a non-potable groundwater condition for industrial/commercial/community (I/C/C) property use (Table 3 SCS). Table 3 SCS

would generally be applicable to assess the suitability of reuse of soils on-site or for imported materials.

- *Table 9 Generic SCS*: in a non-potable groundwater condition for industrial/commercial/community (I/C/C) property use (Table 9 SCS). Table 9 SCS would be applicable to assess the suitability of reuse of soils on-site within 30 meters of water bodies (i.e., east and west channels, and wetland area).

Also, the following waste classification criteria should be used for the evaluation of contaminated soils as non-hazardous waste:

Source	Reference	Description
Environmental Protection Act (EPA)	R.S.O. 1990	Protection and conservation of the natural environment.
Environmental Protection Act (EPA)	O. Reg. 127/01	Air pollution control and quality
Environmental Protection Act (EPA)	O. Reg. 419/05	Air pollution control and quality
Environmental Protection Act (EPA)	O. Reg. 153/04	Environmental site assessment
Environmental Protection Act (EPA)	O. Reg. 63/16	Water taking requirements for road construction and site dewatering
Environmental Protection Act (EPA)	Part V	Waste management
Environmental Protection Act (EPA)	R.R.O. 1990, Reg. 360	Application, cost, payment, insurance of spills
Environmental Protection Act (EPA)	R.R.O. 1990, Reg. 362	Management of waste containing PCBs
Environmental Protection Act (EPA)	R.R.O. 1990, Reg. 347	Definition and management of wastes
Occupational Health and Safety Act (OHSA)	R.S.O. 1990	Protection of workers

Occupational Health and Safety Act (OHSA)	O. Reg. 213/91	Safe work at construction projects
Occupational Health and Safety Act (OHSA)	O. Reg. 278/05	Designated substance: asbestos
Occupational Health and Safety Act (OHSA)	R.R.O. 1990, Reg. 839	Designated substance: benzene
Occupational Health and Safety Act (OHSA)	R.R.O. 1990, Reg. 843	Designated substance: lead
Occupational Health and Safety Act (OHSA)	R.R.O. 1990, Reg. 844	Designated substance: mercury
Occupational Health and Safety Act (OHSA)	R.R.O. 1990, Reg. 846	Designated substance: vinyl chloride
Ontario Water Resources Act	R.S.O. 1990	Supervision of all surface and groundwaters
Ontario Water Resources Act	R.R.O. 1990, Reg. 903	Water wells
Ontario Water Resources Act	O. Reg. 387/04	Water taking and transfer.
Fire Protection and Prevention Act	O. Reg. 213/07	Storage, handling, use, and processing of flammable/combustible liquids
Technical Standards and Safety Act	S.O. 2000, c. 16	Technical standards for safety
Technical Standards and Safety Act	O. Reg. 213/01	Installation, testing, maintenance, replacement, and repair of fuel-sourced equipment
Technical Standards and Safety Act	O. Reg. 217/01	Handling, loading, or dispensing of liquid fuels
Dangerous Goods Transportation Act	R.S.O. 1990, c. D.1	Promotion of safety in transporting dangerous goods

## 2. Classification

Depending on soil quality, excavated soils will be characterized into soil quality classes with options for on-site reuse or off-site disposal or management:

Soil Quality Class	Description	Option A: Reusable On-Site	Option B: Off-site Management with Restrictions	Option C: Disposal at an MECP facility as non-hazardous waste
Class A: No Restrictions	Meets Table 1 (Typical Ontario Background SCS)	Yes	Yes	Yes, subject to TCLP waste classification
Class B: Restricted	Exceeds Table 1 (Typical Ontario Background SCS) but meets the Table 2/3 Full-depth generic SCS for industrial/commercial/community (ICC) land use	Yes	Yes, subject to fill management plan	Yes, subject to TCLP waste classification
Class C: Restricted	O. Reg. 419/05	Yes	Yes, subject to fill management plan	Yes, subject to TCLP waste classification

Class D: Waste	Exceeds Table 2/3 Full-depth generic ICC SCS for EC/SAR	Unlikely	Unlikely	Yes, subject to TCLP waste classification
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### 3. On-Site Soil

Any material excavated from the Site will be tested for the contaminants of concern (CoCs) to confirm its suitability for re-use at a sampling frequency specified in the following:

Volume (m <sup>3</sup> )	Minimum # of On-Site Screening Samples	Minimum # of Laboratory Analysis Samples
<50	5	1
>50-149	15	3
>150-499	30	5
>500-1499	50	10
>1500	75	15

Any material suspected of containing contaminated soil that is to be stockpiled will be placed on polyethylene sheeting and will be covered to mitigate against the generation of dust and surface run-off. If it is to be stockpiled on-site for longer than 24-hours, it will be secured by temporary fencing consisting of 1.5-2 m high steel fencing within public access areas or snow fencing if not. All efforts should be made to segregate contaminated soil from other surplus soils and if used as backfill they should be placed in a controlled area to prevent the impacts from becoming mixed with clean soils (i.e., Class 1/2 soils with concentrations meeting the Table 3 or 9 SCS). The reuse of contaminated soil is also subject to the suitability of the material for use as engineered fill which will be determined by the geotechnical consultant.

Soils contaminated with salt-related parameters (EC/SAR) would be reusable on-site subject to the following restrictions:

- Impacted soils with values exceeding the Table 9 SCS cannot be placed/reused within 30 meters of a water body.

- Class 3 soils come with all of the restrictions mentioned above, however, EC/SAR impacted soils with values exceeding the Table 3 SCS should be placed/reused within roadways assuming that the substance has been used on a highway to keep the highway safe for traffic under conditions of snow or ice or both, if possible, or reused elsewhere on-site (except in landscaped areas) subject to approval by the client.

#### 4. Off-Site Soil

For soils exceeding Table 1 SCS (soil Classes 2 and 3), the off-site management of marginally-impacted materials may be shipped to a receiving site capable of accepting soils at that quality, subject to review and approval of a qualified person with import testing specifications presented in a fill management plan (FMP) as per the best management practices (BMP) or as required for a brownfield site with a record of site condition attached.

The recommended sampling frequency under frequencies outlined in Ontario Regulation 153/04 will be one (1) analyzed sample for every 160 m<sup>3</sup> of exported soil up to 5,000 m<sup>3</sup> of export, but the actual sampling frequency will be dictated by the receiving site.

A final FMP will be required for each receiver site that can accept soils of this quality, and for those receiver sites that did not have an FMP.

For soils exceeding Table 3 SCS (soil Class 4 and other materials), waste disposal will be controlled as per Ontario Regulation 347 requirements for waste tracking and acceptance. At a minimum, the soil and excavated material inspectors/consultants will ensure that the final disposal/treatment facility is an MECP approved waste disposal or treatment facility and that the site has a waste generation number provided by MECP. All required manifests and documents for transportation and disposal of the contaminated soil will be collected and retained.

Soils with evidence of petroleum hydrocarbon (PHC) odours and asphalt fragments would require MECP landfill facility disposal as waste. Other non-soil materials, including railway bedding, railway ties, or ballast materials encountered during the earthworks will also require waste classification to ensure that these materials are not leachate toxic and are suitable for offsite disposal as non-hazardous waste. These non-soil materials will be handled as hazardous waste if leachate toxicity is confirmed.

Any soil excavated from the site that is found to exceed the generic Table 3 SCS and poses an unacceptable risk for reuse, will be removed from the site and disposed of per applicable legislation and following generally accepted industry practices. Alternatively, soils of this quality could be transported to a remediation site in need of fill, under Ontario Regulation 153/04 as per an FMP prepared by a soil and excavated material inspector/consultant.

Contaminated soil requiring off-site disposal as waste must be analyzed to determine the waste classification, but it is unlikely that additional bulk soil quality analysis will be

required. The analyses will be completed by a Canadian Association for Laboratory Accreditation (CALA) accredited laboratory and samples submitted for a TCLP analysis following Schedule IV of Ontario Regulation 347, as amended, to characterize the soils for off-site disposal. The analytical results for the stockpiled soils will be maintained on-site and made available to clients upon request. Impacted soils transported off-site for disposal will be disposed of at an MECP approved facility licensed to accept the material.

#### *5. Imported Soils*

Soils brought to the site must meet the requirements for soil importation as outlined in the Ontario Regulation 153/04, Schedule E, Section's 30 to 36. Imported granular and aggregate materials brought to the site should be sourced from a commercial, licensed pit, or quarry.

Should imported materials be brought to the site originating from sources other than a licensed pit or quarry, those materials will be tested for suspected contaminants of concern associated with those source sites at a frequency of one (1) analyzed sample per for every 300 m<sup>3</sup> to 500 m<sup>3</sup>, assuming that >5,000 m<sup>3</sup> of imported soils are required.

The concentration of each of the following CoCs must meet either the Table 3 or 9 SCS:

- electrical conductivity (EC), sodium adsorption ratio (SAR)
- metals/inorganics, polycyclic aromatic hydrocarbons (PAHs)
- volatile organic compounds (VOCs)
- polychlorinated biphenyls (PCBs)
- petroleum hydrocarbons (PHCs)

The importation of soils, granular materials, or recycled concrete will be documented by the project manager in monthly monitoring reports (if applicable). Should soils require importation, the existing soil quality analysis will be reviewed and approved by the project manager, and consultants (if applicable) to ensure that the analytical results meet the requirements of the plan.

#### *6. Stock Piling/Soil Handling*

Excavated contaminated soils will be either loaded directly into dump trucks or stockpiled in a designated area by MGI Construction Corp. Should it be necessary or required to temporarily stockpile excavated contaminated soil, the excavated soil will be placed in controlled stockpiles at predetermined locations. Stockpiles will be constructed by MGI Construction Corp. to prevent the release of dust, odours, or sediment into stormwater infrastructure. Such measures may include but are not limited to:

- Stockpiles should be kept a minimum distance of 30 meters from waterbodies and environmentally sensitive areas.
- Placement of stockpiles on 0.4 millimeters (minimum) polyethylene sheeting to contain any moisture in the soil material and prevent impact to the underlying soils.

This requirement only pertains to soil with contamination that has been identified as a human health risk (i.e., VOCs, PAHs, PHCs). Soils with EC and SAR impact does not require this measure.

- Grading the stockpiles in a manner to control the direction of run-off, and to a maximum height of 3 meters.
- Spraying with water to reduce dust.
- Covering with polyethylene sheeting or thick tarpaulin to protect from adverse weather, wind, and rain (depending on size). This requirement only pertains to soil with contamination that has been identified as a human health risk (i.e., VOCs, PAHs, PHCs). Soil with EC and SAR impact does not require this measure.
- Perimeter barriers including hay bales or silt fencing (as appropriate) to minimize the impact from run-off during severe weather events.

Should it not be possible to complete the installation of the polyethylene sheeting, soil remaining after the removal of the stockpile will be visually and chemically tested to ensure that no remaining contamination is present at the site. Controlled stockpiles will be monitored continually by the site superintendent or delegate, with daily records of deviations from this plan logged in the monthly monitoring reports.

In a storm event, the structures located on-site for sediment control will need to be inspected and replaced or altered if necessary. Any material which is retained behind the sediment control structures will be collected at the end of the event and stored in the stockpile area for testing and proper disposal as other contaminated materials.

## *7. Monitoring & Control*

### *Administrative*

Administrative controls will be used in the work zone to reduce the potential for worker contact with contaminated soil or dust (or groundwater). Administrative controls include limiting equipment speeds, limiting traffic volume to only essential vehicles, and minimizing dust-generating activities. Examples of administrative controls are provided below:

- Limit maximum speeds on unpaved roads to 15 km/h.
- Post speed signs at the entrance to the construction zone.
- Control heavy equipment and vehicle routing to designated roadways or paths.
- Restrict working areas in high wind conditions.
- Mark vehicle routes, traffic plans, and entrances and exits to the construction zone on a site plan.
- Restrict access to only approved personnel.
- Restrict vehicles to designated employee parking areas. Cars driven by site workers and visitors should be banned from work areas except under emergency conditions.
- All information collected to locate, identify, and characterize impacted material will be maintained in an organized, accessible manner. Representative soil samples

will be collected with the aid of an excavator, examined, classified, and logged according to soil type, moisture content, colour, consistency, and presence of visual and/or olfactory indicators of negative impact. All soil samples will be collected under strict environmental sampling protocols to minimize the loss of volatile organics and to ensure reliable and representative results. Disposable nitrile gloves will be worn and replaced between the handling of successive samples. All soil sampling and handling equipment (stainless steel trowels, spatulas, etc.)

### *Work Area Access*

- Work area access is restricted to authorized personnel only.
- The work area must be made secure by means of barricades and/or fencing and have at least one (1) person stationed close to any open excavation where potential access by members of the public has not been secured.
- Vehicles brought by contractor employees will be restricted to designated parking areas and will not be permitted in work areas except in the case of emergencies.
- Areas used for parking by contractor employees will be agreed upon in advance with the client where the vehicles are to be parked.
- Construction equipment and vehicles needed at work areas will follow predesignated travel routes including construction paths, abide by speed limits different from those already posted, follow special signage, enter/exit at special vehicle entry/exit points.

### *Ongoing Use of Public Roads*

A traffic management plan is to be implemented whenever excavation activities take place on public roads. These controls are to include but not be limited to deploying traffic control signs, using flagmen, and providing off-duty police officers if needed.

### *Odour Suppression*

MGI Construction Corp. takes the following steps to minimize vapour and odour emissions to ambient air and to prevent nuisances occurring at downwind locations:

- The amount of exposed surface area in excavations will be minimized where possible.
- Stockpiles that will remain for extended periods will be covered.

### *Decontamination*

Decontamination procedures are intended to reduce the potential for soil particles disturbed in contaminated soil areas to be carried by vehicles or construction equipment onto and away from the site. Before equipment is brought to the site, it is to be inspected to ensure that it is clean and in good working order and that no fluids are leaking from the equipment.

For vehicles and equipment used during excavating activities in contaminated areas of the site, MGI Construction Corp. will implement the following procedures:

- A mud mat will be constructed at the site where all vehicles and construction equipment will be inspected before departing the work area. Special attention should be paid to tires and truck boxes. This also applies to the tires of trucks taking excavated or extracted materials for disposal off-site.
- If necessary, all solids (soil) must be removed from vehicles or construction equipment using physical means before leaving the work area.
- Vehicles leaving the site will be cleaned when required, at several mud mat stations positioned at entrance/exit points around the Site. Wash water will be collected and containerized in a suitable tank or storage facility. Wash water will be characterized and disposed of per applicable regulations.

If vehicle and equipment cleaning measures are required where contaminated materials have adhered, the use of wash water may be required. Wash water must be collected and pumped into temporary storage tanks located on or adjacent to a decontamination pad. MGI Construction Corp. will obtain any permits or agreements needed to discharge to a municipal sewer, the chemical testing of wash water, and arranging for the disposal of the wash water as per the agreement.

Personnel and equipment in contact with contaminated soil that exceeds the applicable standards for the Site (e.g., Table 3 SCS) will be decontaminated. For personnel, this will include the use of water, laboratory-grade soap, and brushes. For construction equipment, all trucks should be inspected and decontaminated (if required) before leaving the site. Construction equipment that has come into contact with contaminated soils should be cleaned using physical brushing and/or a high pressure, low volume, water wash to remove any mud, hydraulic fluid, or other foreign matter.

Any vehicles such as dump trucks or personal vehicles which may come into contact with contaminated material while on-site will also be decontaminated before leaving the site to ensure that impacted soils are not tracked onto public roadways.

### *Dust Control*

MGI Construction Corp. will implement dust control measures during excavating activities at the site. These measures are intended to reduce the potential for soil particles to become suspended and transported in the air to locations outside the work areas. Dust control will be implemented as per the air quality management plan (if applicable).

Dust control measures may include the monitoring of dust levels in the air, applying water or other chemicals to unpaved vehicle routes, and cleaning roads of dirt and debris. Dust control measures will be implemented during activities to reduce the potential for soil particles to become suspended and transported in the air to locations outside the work area.

### *Erosion Control*

- Protect gutters, storm drains, catch basins, and other drainage system features using hay or straw bales or silt fences.
- Clean catch basins after site work.
- Prevent spillage during transport.
- Stabilize exposed areas using seeding or sodding.
- Minimize contact of waste materials with rainfall and runoff. Water that comes into contact with waste needs to be separated from runoff and needs to be tested and may need to be treated.
- Barriers are to be used to minimize potential contact and runoff creation.
- Temporary stockpiles should be covered.
- Erosion control mechanisms should be inspected during rain events and the results recorded.
- There should be a contingency plan in case of failure of any erosion control measure.

The need for corrective actions will be assessed by visual observations made by MGI Construction Corp. and the soil and excavated material inspectors/consultants. If erosion or sediment control measures associated with contaminated materials are not operating as designed or meeting performance requirements, then MGI Construction Corp. will review the situation with the soil and excavated material inspectors/consultants and subsequently describe the proposed corrective actions.

### *Engineering*

Engineering controls will be used in the work zone to reduce the potential for worker contact with contaminated soil or the migration of potentially contaminated soil due to dust generation, soil tracking, or erosion. Examples of engineering controls are provided:

- Work practices for heavy equipment operators, to minimize dust generated during the excavation, transportation and placement of materials, and to prevent spillage.
- Dust control and dust suppression methods before, during, and after construction activities.
- Decontamination of vehicles and equipment.
- Spillage control, spill management, and cleanup.

### *8. Sustainability*

The overall goal is to develop a strategy for the management of soils sustainably while maintaining a sensitivity to schedule, construction limitations, and environmental protection, using sustainability practices for excess soils. The following objectives will be taken into account for managing excavated material:

- *Reduced Use of Energy and Emissions:* the production of air pollutants during truck traffic is generally associated with the removal of soils for off-site disposal. Therefore, the ability to reuse soils in a responsible manner instead of removing soils for off-site disposal and then importing fill will reduce the release of air pollutants due to increased truck traffic.
- *Integration:* as soil is a resource, the off-site disposal of excess soils will be minimized wherever possible by reusing soils on-site subject to geotechnical and soil quality limitations to create berms and reused as engineered backfill. Analytical testing, possible landscape design changes, and geotechnical modifications (i.e., dewatering/screening procedures) will be considered. In addition, risk-based principles will determine ecosystem health risks as a result of the reuse of salt (EC/SAR) impacted soils on-site, including areas within 30 meters of water bodies. An attempt will be made to reuse soils with other contaminants present by considering other risk-based principles and risk management options, such as hard caps and other means of limiting exposure.
- *Impact on Ecosystems:* the impact of contaminated soils, including salt-impacted soils, on local vegetation and water bodies will be minimized by the adequate assessment and management of those soils per the soil and excavated material management plan.

## Responsibilities

### *Project Manager*

- Adhere to the requirements of the soil and excavated material management plan and facilitate the control measures.
- Perform the work practices, inspection, and monitoring activities detailed in the soil and excavated material management plan.
- Monitor, test, and document materials being excavated, reused, imported, or removed for off-site disposal per the soil and excavated material management plan.
- Arrange soil disposal locations.

### *Soil and Excavated Material Inspectors/Consultants*

- Ensure that work is carried out per the soil and excavated material management plan.
- Be competent and have adequate support to enforce the soil and excavated material management.
- Review soil quantities, receiver sites, fill management plans, and activity logs provided by the project manager regularly.
- Lead investigation and response to trigger events or site conditions.
- Prepare soil and excavated material monitoring reports.
- Prepare the soil and excavated material management implementation report.
- Ensure environmental issues are addressed and requirements are met.

- Act as the single point of contact for MGI Construction Corp. on all matters relating to environmental management.
- Assess and endorse soil management initiatives during construction activities.
- Provide support for the implementation of the environmental management plans and the soil and excavated material management plan.
- Conduct periodic site inspections and investigations where required.
- Complete appropriate documentation and submit it to management.

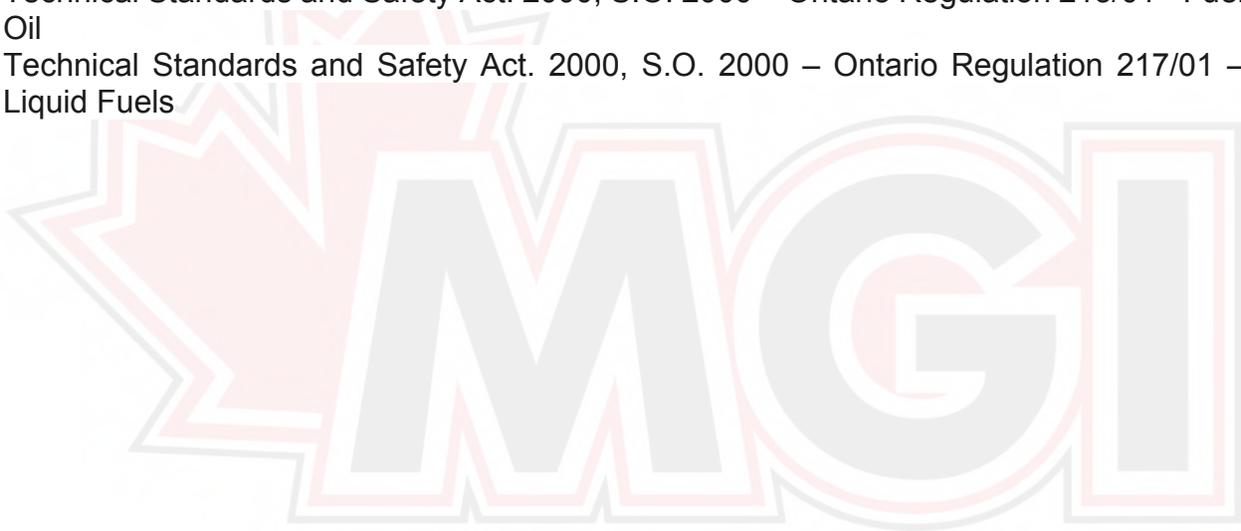
### *Workers*

- Participate in required training and ensure a full understanding of the importance of soil management and the requirements of the soil and excavated material management plan.
- Adhere to the principles and requirements outlined in the soil and excavated material management plan or as instructed by the project manager or the soil and excavated material specialist.

### References

Ministry of the Environment, Conservation and Parks – Management of Excess Soil – A Guide for Best Management Practices  
Ministry of the Environment, Conservation and Parks – Water Management: Policies, Guidelines, Provincial Quality Objectives  
Ministry of the Environment and Climate Change – Land Disposal Restrictions Handbook  
Ministry of Transportation – Environmental Guide for Contaminated Property Identification and Management  
Environmental Protection Act, R.S.O. 1990  
Environmental Protection Act, R.S.O. 1990 – Ontario Regulation 153/04 - Records of Site Condition - Part XV.1 of the Act  
Environmental Protection Act, R.S.O. 1990 – Ontario Regulation 127/01 - Airborne Contaminant Discharge Monitoring and Reporting  
Environmental Protection Act, R.S.O. 1990 – Ontario Regulation 63/16 - Registrations under Part II.2 of the Act - Water Taking  
Environmental Protection Act, R.R.O. 1990 – Ontario Regulation 360 - Spills  
Environmental Protection Act, R.R.O. 1990 – Regulation 362 - Waste Management - PCB's  
Environmental Protection Act, R.S.O. 1990 – Ontario Regulation 419/05 - Air Pollution - Local Air Quality  
Environmental Protection Act, R.S.O. 1990 – Part V - Waste Management  
Environmental Protection Act, R.S.O. 1990, c. E.19 – R.R.O., Regulation 347 - Waste Management  
Occupational Health and Safety Act, R.S.O. 1990  
Occupational Health and Safety Act, R.S.O. 1990 – Ontario Regulation 213/91 - Construction Projects

Occupational Health and Safety Act, R.S.O. 1990 – Ontario Regulation 278/05 - Designated Substance - Asbestos on Construction Projects and in Buildings and Repair Operations  
Occupational Health and Safety Act, R.S.O. 1990, c. O.1 – Regulation 839 - Designated Substance - Benzene  
Occupational Health and Safety Act, R.S.O. 1990, c. O.1 – Regulation 843 - Designated Substance - Lead  
Occupational Health and Safety Act, R.S.O. 1990, c. O.1 – Regulation 844 - Designated Substance - Mercury  
Occupational Health and Safety Act, R.S.O. 1990, c. O.1 – Regulation 846 - Designated Substance - Vinyl Chloride  
Ontario Water Resources Act, R.S.O. 1990  
Ontario Water Resources Act, R.S.O. 1990 – Ontario Regulation 903 - Wells  
Ontario Water Resources Act, R.S.O. 1990 – Ontario Regulation 387/04 - Water Taking and Transfer  
Fire Protection and Prevention Act, 1997 – Ontario Regulation 213/07 - Fire Code  
Technical Standards and Safety Act. 2000, S.O. 2000 – Chapter 16  
Technical Standards and Safety Act. 2000, S.O. 2000 – Ontario Regulation 213/01 - Fuel Oil  
Technical Standards and Safety Act. 2000, S.O. 2000 – Ontario Regulation 217/01 – Liquid Fuels





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**Company Policy**  
*Quality Assurance/Quality Control (QA/QC)*



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## Objective

The purpose of quality assurance/quality control (QA/QC) is to meet the customer's requirements, expectations and needs, as well as to ensure our products and services are free from defects, deficiencies, and substantial variants. This procedure will ensure standards are followed to satisfy the client's requirements.

## Scope

Applies to all workplace projects and corresponding personnel who are involved with the project. This also applies to off-site activities that relate to the job (e.g., prefabrication of products to be installed on the project ).

## Definitions

*Client:* contracting authority.

*Corrective Action:* an activity, the intention of which is to return the non-conforming item or action to a stage of conformity. It also covers the action taken to prevent further reoccurrences of nonconformity.

*Independent Quality Audit:* a third-party audit by an independent quality auditor certified by an accredited auditors' registration body.

*Preventive Action:* steps that are taken to eliminate the causes of potential non-conformities.

*Project Delivery System (PDS):* a method used to organize and finance the design, construction, operation, and maintenance of products or services for a structure or facility while entered in a legal agreement(s) with one or more entities or parties.

*Project Management Team:* all internal personnel responsible for the delivery of the project.

*Quality Assurance:* refers to all planned and systematic activities implemented within the quality program and demonstrated as needed, to provide adequate confidence that products and services will fulfill the contractual requirements for quality.

*Quality Control:* refers to activities such as inspections, examinations, testing, or reporting to verify that quality requirements have been attained.

*Quality Documentation:* quality records, document requirements, submissions, updates, and reports.

*Work Breakdown Structure (WBS):* defines all the things a project needs to accomplish. It is organized into multiple levels and traditionally displayed graphically.

*Work Methods:* physical actions or related activities employed to perform a task.

## Procedure

### 1. *Project Integration*

MGI Construction Corp. will leverage a well-established and comprehensive project delivery system (PDS) to guide the successful completion of the project. The PDS is intended to go beyond disciplinary and technical boundaries and focuses on the managerial processes that must be in place for project and program (e.g., QA/QC) tasks to succeed and remain on target and within objectives.

A key component of the PDS is the implementation of controls, assessments, and analysis for project scope, schedule, cost, resources, communications, risk, procurement, and stakeholder integration. To accomplish this, we will empower the internal project management staff to make the various moving parts within the project align and flow together. This is further understood to recognize the trade-offs inherent within project management and allow for the reconciliation of competing wants and needs to complete the project on time and within budget as well as catering to stakeholder expectations. This means identifying, defining, combining, unifying, and coordinating the many processes and activities within the project management process groups.

Project integration management involves making informed decisions about resource allocation and the interdependencies contained within each project management knowledge area. As a whole, integration takes into account numerous and varying deliverables, inputs, and outputs that involve the project charter, scope statement, the project management plan—right through to project closing.

### 2. *Project Scope*

The project management team, in collaboration with QA/QC, will evaluate the construction execution plans and determine where a work method will be required to detail the steps required to ensure that the execution of the work is carried out safely, protects the environment, and that the completed work meets all the required quality standards.

The project scope is intended to mirror the agreed-upon contractual work. Project scope management ensures all the required work and only the required work necessary to complete the project is accomplished. Any work not meant to fulfill the project scope is considered 'out of scope.' This does not support the needs of the project and thus should not be performed. Projects without clear and distinct scope statements are susceptible to project creep—where unnecessary or additional work is performed without the project needs in mind. Objectives define the targeted changes in the organization the project is expected to achieve. Activities that fall outside of this are to be avoided.

Further, objectives should follow *SMART* guidelines:

- *Specific*: the objective is clearly stated.
- *Measurable*: metrics exist or are created to determine when the objective has been met.
- *Attainable*: the objective is realistic.
- *Relevant*: the objective fits the project management plan and supports the project charter.
- *Time-based*: a date for achieving the objective is clearly stated.

Work methods are plan statements that describe the procedures and related operational sequences. The objective of them is to identify the resources needed for site work activities and to ensure the work is effectively completed with a high degree of efficiency, safety, and quality. During the execution of the project scope, the project management team will monitor the effectiveness of the work method(s) to ensure that it is functional and consistent with field operations. If required, the work method(s) will be revised and reissued.

Project execution is tracked against the control estimate and control schedule for all tasks on the work breakdown structure (WBS) on a daily, weekly, and/or monthly basis, and any deficiencies are immediately targeted and resolved by the project management team. This procedure ensures any changes or deficiencies on the project are noted immediately and that the appropriate resources are marshalled to address changes on the project.

### 3. *Project Schedule & Cost*

Project execution will be measured against the project baseline. This includes schedule, cost, and scope. The project schedule is developed by the project management team and is intended to establish project targets, milestones, and goals related to each aspect of the work plan. The estimate (i.e., cost) and schedule form the basis for the work plan, which is created by the project manager and is key for controlling project financials and schedule progress.

Project scheduling is completed through software that monitors timelines and projected completion rates, start/end dates, and metrics (if applicable) against a standard time period (i.e., daily, weekly, monthly) appropriate for the project. The critical path of a project is the set and sequence of scheduled activities that determine the duration of the project and is meant to provide the foundation for a successful and timely project.

The following items are objectives for the project schedule to detail or allow for the extrapolation of:

- the number of hours expended for that period
- the cumulative number of hours expended
- the weekly and cumulative expenses incurred during the project
- the total number of hours, labour costs, and expenses in the budget

- the percentage of time and money expended to date
- the percentage completion of each task

This schedule allows the parties to track project performance and predict future performance trends. This approach can also be used to track costs by task, maintain up-to-date budgets, and highlight any potential problem areas or tasks (through forecast estimates of cost and schedule to completion). Further, it can also be used to support the preparation of the monthly progress reports to our clients and identify potential areas requiring a scope change.

### *Principles*

Our underlying principles for controlling schedule and cost include:

- No work outside of the approved scope or budget will be completed unless prior written approval is obtained from our clients for the scope or budget change request.
- Work performed is conducted in a surprise-free environment and the project management team receives early notice or predicts that costs incurred are not aligned with those planned in the project baseline. The project manager can then advise the client proactively by raising concerns at scheduled progress meetings.
- As described in the work plan(s), the scope of each task item is detailed and tied to the respective drawings and specifications. The tasks are then translated into the project schedule in terms of duration and sequencing.
- Schedule and cost targets are monitored by an analysis of the extent to which the actual value (measured from the actual work completed) has been achieved during the project's execution—relative to the work plan.
- In the event that there is a variance which may cause or be subject to schedule creep, it will be raised at scheduled progress meetings and the project manager is to provide a detailed description of the deviation from the baseline schedule, its causes, potential remedies, and a recommendation on how to correct the schedule variance.
- To ensure all cost-effective and time-saving alternatives are investigated and implemented (if applicable). This ensures the efficient execution of the projects. All potential remedies (e.g., fast-tracking) will be pursued in order to develop a recommendation to counter schedule creep in a way that best meets the project objectives and avoids changes to project cost.
- At the time of project completion when close-out documentation is prepared, MGI Construction Corp. will prepare the final closure documents and as-built documentation that recognizes the final work plan.

### *4. Project Resources*

Project resources are what make up the heart of the project thus are central to a successful PDS. These include but are not limited to the people, capital, and material

goods. Project resources are to be managed and allocated in relation to project objectives. The allocation of limited resources is based on the priority (where priority is based on the critical path, see *Project Schedule & Cost*) given to each of the project activities. The target is to maximize the use of available resources in conjunction with the critical path. The project manager is responsible for managing the release and timely resolution of conflicts as they relate to both the critical path and project resources.

### *People*

All employees that affect the quality of the work, including project management, design, construction, QA/QC, and commissioning will be fully competent. This competence is based on their education, training, skills, and experience. The project management team is to ensure that qualified and experienced personnel are employed on the project. Internal staff responsible for hiring (i.e., human resources) will determine and evaluate the required competence and skill levels. They are also responsible for identifying and arranging any training that is required.

### *Continual Improvement*

Continual improvement is understood as the ongoing effort to improve the effectiveness of project delivery through policies, quality objectives, audits, analysis of data, corrective and preventive actions, information derived from lessons learned, and management reviews. The project management team will ensure that whenever opportunities for improvement are identified, during field surveillance and/or overseeing of work performed, they are brought up for review and if deemed necessary, they are followed through. This is an active process performed throughout the duration of the project.

### *Non-Conformance of Product or Services*

The project management team has the authority to stop any work that is nonconforming (i.e., not meeting standards set out in the contract agreement) and will immediately issue stop-work orders which will require addressing prior to continuing that element of the work. The project management team ensures that the work that does not conform to the contract requirements is identified and controlled to prevent its unintended use or delivery.

The non-conforming product(s) or service(s) may be physically identified by means of tagging, spray marking, or other, and in the associated documentation and records. Depending on the nature of the product(s) or services(s) this could be segregated or left in its original position. The project manager will ensure that the non-conforming product(s) or service(s) are effectively identified and that they are not accidentally or unintentionally incorporated into the work. The project manager will inform subcontractors, suppliers, and/or the construction management team accordingly. Once the non-conforming product(s) or service(s) are corrected and verified the project manager will inform the relevant parties.

The project management team will be responsible for any remedial work required as a result of any failure to pass any calibration, test, trial, mock-up review, sample, or material or site inspection in accordance with the contract agreement.

### *Documentation*

Documents will be controlled and reviewed by the project management team by using an internal coding system and all the documents relevant to the scope of work will be retained through an internal storage system. Revised versions will be documented using an internal document naming convention system with the revision number and the most up-to-date information (i.e., most recent update or revision) made available for view/use. All documents are made available to the project management team in real-time.

### *5. Project Communications*

We recognize the importance of communications in establishing and maintaining control of all aspects of the project, most notably in controlling the scope of the work. MGI Construction Corp. will use the project charter with reference to the responsibility assignment matrix where clear outlines of roles and responsibilities for each task on the project are documented.

The project manager is the first line of authority for the project and ultimately accountable to our clients and the overall project outcome. In this role, the project manager is responsible for the following communications and reporting processes:

- Initiates the project by establishing the project charter as the instrument that will convey the authorities in terms of communications and reporting. Once the charter has been approved by the client, the next activity is the confirmation of assignment(s) of identified work elements to competent persons. This responsibility assignment matrix is the key document for controlling the execution of work.
- Formalizes the communication plan which is an overview of project communications at a high level and overall, presents an outline of information flow. For instance, detailing how, when, and where to archive project documentation, the process of project reporting (e.g., status reports, technical data, meeting minutes), how to distribute schedules, timesheets, and when and where status reports will be published to team members and stakeholders (if applicable).
- Communicates to the project management team on a regular basis during project execution to provide assistance in elaborating on and operationalizing the various plans and submittals and preparing progress reports for submission to the client to update them on the current work completion and to arrange payment.
- Controls all proposed and actual changes to the scope, budget, and schedule by monitoring progress and attending start-up and biweekly meetings (project-specific). All change requests are to be reviewed formally and must be approved by the client before implementation.

- Prepares all close-out submittals so that the client has the required documents and records of all work completed.
- Resolution of disputes arising within the project team or its sub-consultants, sub-contractors, and/or suppliers.

Project communications will occur only with authorized individuals as set out by the client or as agreed upon in the communication plan. We expect the client to lead and coordinate communications with the community and stakeholders where applicable. External communications in regard to the project will be supported by MGI Construction Corp. where necessary. This support may come in the form of responding to questions of a technical nature concerning the construction plan, and as such, our project team will be reasonably available to respond to any questions or attend formal meetings that may arise from the client's concerns or general inquiries related to project delivery.

## 6. *Project Risk*

Project risk is critical in the sense that the least number of surprises occur while the project is underway. Although there is no risk analysis that exists in which every potential risk is identified, MGI Construction Corp. makes use of simple and streamlined risk management processes to predict the uncertainties in the project and minimize the occurrence or impact of these uncertainties. Overall, effective risk management improves the chance of successful project completion and reduces the consequences of these associated risks.

The project management team makes use of a structured risk management framework, aiming at:

- Conscious and focused risk identification and management.
- Project progress as desired, with the least amount of deviations or surprise, and in line with project and organizational objectives.
- Early and effective communication of project issues to the organization and project stakeholders.
- A team-building tool.

Risk management is an iterative process and each facet of risk management should be planned and followed during each phase of the project. Risk management is performed within the following structure:

1. Sources: use of existing risk repository, expert judgement, and checklists.
2. Categorization: technical, external, organizational, project management.
3. Probability of Occurrence: high to low.
4. Impact: high (e.g., critical) to low (e.g., marginal)
5. Exposure: [impact x probability].
6. Occurrence Timeframe: near to far.
7. Classification: detailed description of the event with a corresponding risk score (e.g., x/100).

## *7. Project Procurement*

Procurement activities are controlled to ensure that the work meets the project requirements for design and construction documentation and the project agreement. Suppliers, subcontractors, and other third-party vendors (e.g., consultants) will be evaluated and selected on the basis of demonstrated capability and performance and assessment of their capabilities to meet specified requirements and performance levels.

The requirements for the procurement of products and services will be detailed in the relevant procurement documents including purchase orders, tenders, the supply of contract, scope of work, technical specification and drawings, and applicable inspection and testing plans. Prospective suppliers are evaluated or prequalified to ensure they have the capabilities and expertise to supply or conduct the scope of work in the potential supply package.

The project management team will ensure the purchased products conform to the specified requirements by carrying out the activities established in the applicable inspection test plans. The procedure, method, and location for the product(s) will be established in the purchasing documentation. Product handling, storage, and delivery will be implemented in accordance with the supplier's/vendor's recommendations to minimize the potential damage to the materials. This will be in effect throughout the construction project right up to delivery to the client.

## *8. Project Stakeholders*

MGI Construction Corp. selects the project management team based on their past experience on similar projects or specific expertise that they have gained over the course of their career. It is established that the project management team will adhere to the QA/QC processes for the duration of the project. Senior management will provide oversight on all aspects of our projects and will ultimately be accountable to the client to make sure that their quality objectives for the project are satisfied. It is understood that the relevant QA/QC criteria and processes will be met and will, therefore, be instrumental in providing a successful PDS.

## **Responsibilities**

### *Project Manager*

- Responsible for the construction management of the assigned scope of work to ensure the work is completed in accordance with the issued design documentation.
- Develop, implement, maintain, and ensure the effective implementation of the QA/QC.
- Immediately stop any work or activity which is not being performed or carried out in accordance with the relevant quality documentation.
- Schedule and coordinate independent quality audits with the independent quality

auditor.

- Develop and implement a program for corrective action and preventive action for non-conformance(s) with the QA/QC.
- Preparation, review, and implementation of inspection and test plans.
- Respond to inquiries by the client.

#### *Site Superintendent*

- Responsible for overseeing the day-to-day operations of the site and ensuring that requirements with respect to the site are being followed in accordance with the project agreement (i.e., contract).
- Supervision of quality inspection staff and ensuring that individuals have the required qualifications and experience to undertake the quality control requirements as set out in the project agreement.

#### *Project Coordinator*

- Report to the site superintendent and project manager.
- Responsible for proper coordination of the work by ensuring that work submittals and required plans are produced and reviewed, keeping track of work activities and preparing daily reports, and monitoring work execution.
- Handle project administration including cost, schedule, scope, and change order control.

#### *Estimator*

- Prepare work to be estimated by gathering proposals, blueprints, specifications, and related documents.
- Identify labour, material, and time requirements by studying proposals, blueprints, specifications, and related documents.
- Compute costs by analyzing labour, material, and time requirements.
- Collaborate with engineers, architects, clients, and contractors in accordance with the QA/QC plans.



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January 30, 2024



**Company Policy**  
*Construction/Demolition Waste Management*



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## Objective

The objective of this policy is to divert construction waste materials from the solid waste stream, and redirect the recovered resources to recycling facilities, and eventually back into the manufacturing process. The end result of this process is a reduction in demand for virgin resources, thus reducing the environmental impacts associated with resource extraction, processing, and transportation. This will also result in a reduction of solid waste sent to landfills, thus, increasing the lifetime of landfills and avoiding the need for expansion to new landfill sites. The overall diversion rates will vary from project to project.

## Scope

This policy applies, but is not limited to, project or estimate requirements for construction/demolition waste management during construction or else our commitment to LEED inquiries, prerequisite(s), and/or pre- or post-registry. Further information can be referenced in MGI's *Environmental Protection* and *Soil & Excavated Material* policies.

## Definitions

*Construction/Demolition Waste (C&D)*: sometimes referred to as debris, is any waste/debris from the construction, renovation, and demolition of buildings, roads, and bridges.

*Leadership in Energy and Environmental Design (LEED)*: the most widely used green building rating system in the world. Available for virtually all building types, LEED provides a framework for healthy, highly efficient, and cost-saving green buildings.

*Waste Management Plan (WMP)*: a waste management plan is a document that outlines the activities and methods of waste management from waste generation to final disposal and plays a key role in achieving sustainable waste management. The purpose of the WMP is to ensure that effective procedures are implemented for the handling, storage, transportation and disposal of C&D waste that is generated from the activities on-site.

*Waste Stream*: a specific material category that is diverted in a specific way (plastic, metals, etc.) or a mixture of several material categories that are diverted in a specific way (materials sent to reuse markets, commingled waste sent to mixed waste recycling facility, source separation where each material is sent to a specific facility, manufacturers or suppliers take-back of materials, and reuse of deconstructed materials on-site).

## Objective(s)

At MGI Construction Corp., the goals of this policy are to:

1. Minimize the amount of C&D waste brought to the site
2. Minimize the amount of C&D waste generated on-site

3. Maximize the amount of total C&D waste to be salvaged and/or recycled

## Procedure

1. *Estimates*

Approximate quantities and measurements are typically produced in tonnes where possible, and in cubic yards and pounds where necessary for conversion to tonnes afterward.

2. *Waste Management Plan (WMP)*

Where necessary, relevant specifications regarding waste management and recycling practices will be incorporated into the contract agreements. A representative is responsible for the execution to properly sort and dispose of construction debris following the WMP. If preferred locations are not used or else alternative locations are proposed for waste materials, a modified WMP is to be submitted and implemented with backup documents, weigh bills, and logs in accordance with the requirements of this policy. A WMP typically includes official dump tickets/receipts (information including date, location, source, type of material, and quantity), a statement from the waste management firm explaining end-use of recycled materials, and relevant logs/ledgers and/or summaries referencing the aforementioned.

3. Implementation/Execution

- *Separation*: individual bins for collecting, removing waste from the site, and diverting as much waste as possible.
- *Reduction*: encourage suppliers and subcontractors to retrieve/retain packaging for reuse; prevent damage of materials due to mishandling, improper storage, and contamination; and use prefabricated assemblies built at a central facility to avoid waste generation at the site where possible.
- *Sorting*: off-site sorting of construction and demolition debris at a regional sorting facility can substitute for on-site sorting, as follows: by providing actual weights and volumes of the construction waste and estimates of the materials composition by weight or volume; the recycler confirming the destination and end-use for each material diverted from landfill; and basing the project diversion rate on the confirmed weight/volumes and the actual products diverted from landfill.

4. Communication

On-site pre-construction meeting(s) with contractors, subcontractors, clients, and/or consultants to review the project's waste diversion goals and processes are recommended. Key personnel for the project are invited to attend the meeting(s). The purpose of the meeting(s) is to reinforce participants' commitments to the project goals and requirements and/or raise questions or concerns.

Waste prevention and recycling activities can be introduced during the course of the project. Strategies for correction will be discussed and implemented as needed if the project is not meeting diversion goals.

Contractors, subcontractors, clients, and/or consultants will be given a copy of the WMP. Regular updates should be shared showing the progress to date for achieving the project's waste recycling goals.

## Project Waste, Disposal, and Handling

The following waste materials are expected of typical projects and the table below indicates the categories of waste, along with our recommended disposal and handling protocols. Diversion rate calculations are calculated where required for each waste stream—with the exception of hazardous materials.

Waste Stream	Disposal Method	Handling Procedure
Concrete, Brick, or Asphalt	Recycle	Place excess, free of waste, in an appropriate container to avoid contamination and commingling.
Scrap Metal(s)	Recycle	Place scrap metal in an appropriate container to avoid contamination and commingling.
Wood Products	Recycle	Place wood, free of waste materials, in an appropriate container to avoid contamination and commingling. Place painted/treated wood in a separate bin designated for landfill.
Cardboard	Recycle	Clean cardboard will be broken down and placed in an appropriate container.
Carpet	Recycle	Place carpet tiles in an appropriate container to avoid contamination and commingling.
Drywall	Recycle	Place drywall waste that cannot be used for construction in an appropriate container to avoid contamination and commingling.
Aluminum and Plastic Containers; Mixed Paper	Recycle	Place in a general recycling container.

All other Non-Recyclable C&D Waste	Landfill	Place all other waste that cannot be recycled in 'landfill-only' containers.
Hazardous Materials	Varies (Local Regulations)	Separated and stored in a specific area on-site and disposed of according to local regulations.

## Responsibilities

### *Site Superintendent*

- Responsible for overseeing the WMP on-site.
- Monitor and review the effectiveness of the WMP and make adjustments if necessary.
- Collect necessary waste documentation and data.
- Provide guidance, training, and clarification to workers, as necessary.

### *Project Manager*

- Provide leadership to ensure that the WMP is implemented and executed.
- Oversee the waste/recycling receiving facilities to ensure the use of government-approved material recovery facilities.
- Collect necessary waste documentation and data.
- Monitor and review the effectiveness of the WMP and make adjustments if necessary.

### *Project Coordinator*

- Communicate with contractors, subcontractors, clients, and consultants regularly or as required regarding the implementation of the WMP.
- Oversee and ensure the receipt or creation of tracking sheets, logs/ledgers, etc. from the contractors, subcontractors, clients, and/or consultants.
- Enforce good housekeeping practices and proper waste disposal methods with all contractors, subcontractors, clients, and/or consultants.

### *LEED Representative*

- Review waste documentation as required from contractors, subcontractors, clients, and/or consultants to ensure compliance.
- Update tracking sheets, logs/ledgers, etc. as required.

## References

Canada Green Building Council (CAGBC) – LEED Canada Rating System  
U.S. Green Building Council (USGBC) – LEED Rating System  
Waste Management – Government of Ontario  
A Made-in-Ontario Environment Plan – Government of Ontario





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**Company Policy**  
*Health & Wellness*



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## Objective

Our employee wellness program policy details MGI Construction's wellness initiatives to promote employee health. The objective is for employees to have access to wellness resources that encourage increased health awareness at both the general and specific level. Employee wellness programs have many benefits. Wellness helps people become more productive. It can reduce the number of sick days employees take and various sickness-related expenses and accidents. Employee wellness is a vital aspect of building a happier workplace.

## Scope

This policy applies to all MGI employees. We may offer our wellness program as part of a group health plan or separately.

## Definitions

*Anxiety*: your body's natural response to stress. It's a feeling of fear or apprehension about what's to come.

*Blood Pressure*: the pressure of the blood in the circulatory system, often measured for diagnosis since it is closely related to the force and rate of the heartbeat and the diameter and elasticity of the arterial walls.

*Body Mass Index (BMI)*: a person's weight in kilograms divided by the square of height in meters. BMI is an inexpensive and easy screening method for weight category—underweight, healthy weight, overweight, and obesity.

*Diabetes*: the condition in which the body does not properly process food for use as energy.

*Exercise*: any bodily activity that enhances or maintains physical fitness and overall health and wellness.

*Food Poisoning*: also called foodborne illness, is an illness caused by eating contaminated food. Infectious organisms including bacteria, viruses and parasites or their toxins are the most common causes of food poisoning.

*Mental Illness*: a health condition involving changes in emotion, thinking or behaviour (or a combination of these).

*Stress*: the feeling of being overwhelmed or unable to cope with mental or emotional pressure.

## Objective(s)

There are several goals of this policy, although the list is not exhaustive below, the objective is to promote outcomes that make our employees healthier. Some benefits include:

- Improvement of physical strength and stamina
- Lower blood pressure or cholesterol levels
- Stress management prevention and coping mechanisms
- Reduced use of tobacco and/or alcohol
- Increased physical activity
- Weight/Body Mass Index (BMI) Control

## Practices

### 1. *Controlling Your Weight*

Changing the way you approach weight loss can help you be more successful at weight management. Most people who are trying to lose weight focus on just the goal of weight loss. However, setting the right goals and focusing on lifestyle changes such as following a healthy eating plan, watching portion sizes, being physically active, and reducing sedentary time is much more effective.

### 2. *Healthy Eating*

Eating well is one of the most important things you can do to keep yourself and your family healthy. It can help protect you from heart disease and stroke. It can lower your risk of Type 2 diabetes and some kinds of cancer. It can also stop bone loss as you age.

Programs and resources to help people in the province eat healthy include:

- *Canada's Food Guide*: this program encourages people to eat a variety of foods each day; have plenty of vegetables and fruits; eat a variety of colourful vegetables and fruits; eat whole-grain products; choose fat-free and low-fat dairy products; choose lean meats like skinless chicken or turkey; snack smart (choose dried fruit, carrot sticks, whole-grain crackers); use healthy cooking methods such as baking, broiling or steaming; serve healthy portion sizes; and limit your alcohol intake.
- *Telehealth Ontario*: call *Telehealth Ontario* toll-free at 1-866-797-0000 and speak to a registered dietitian about nutrition and healthy eating.
- *Northern Fruit and Vegetable Program*: this program brings healthy, nutritious food to elementary and intermediate school students in the districts of Algoma, Porcupine and Sudbury. The Ontario Fruit and Vegetable Growers' Association coordinates the delivery of fruits and vegetables to students at least twice a week from January to June. Algoma Public Health, Porcupine Health Unit and Sudbury

and District Health Unit work with schools in their regions. The program reaches over 190 schools and approximately 37,000 students.

### 3. *Mental Health*

Mental health is not only the avoidance of serious mental illness. Your mental health is affected by numerous factors from your daily life, including the stress of balancing work with your health and relationships. In this section, you will find resources to help you stay mentally fit and healthy.

- *Anxiety Disorders*: we all feel nervous or worried at times. This anxiety can be a helpful feeling when it motivates us or warns us of danger. An anxiety disorder, on the other hand, causes unexpected or unhelpful anxiety that seriously impacts our lives, including how we think, feel, and act.
- *Care for the Caregiver*: more and more Canadians take care of friends, family members, and loved ones of all ages living with a mental health problem, whether they live together at home or not. Caring for a loved one can be rewarding, but it can also be tiring, overwhelming, confusing, and stressful. Many caregivers feel obligated to put the needs of others before their own. Yet, when you take the time to take care of yourself, you can help avoid burnout, isolation, depression, anxiety, and other problems that caregiving might bring up.
- *Children Youth and Anxiety*: anxiety is a normal and expected response to a threat. It's what helps you notice danger and keeps you safe until a threat passes. Threats are not just about physical safety. Threats can include conflict at home, deadlines or expectations at school, or fitting in with social groups.
- *Concurrent Mental Illness and Substance Use Problems*: a concurrent mental illness and substance use problem means that someone experiences a mental illness and, at the same time, uses substances like alcohol or other drugs in ways that could cause harm. Substance use is a problem when it negatively affects a person's life or the lives of others. Addiction or dependence (needing to use alcohol or other drugs to stop withdrawal) is one kind of substance use problem, but you don't need to experience an addiction to experience harm to relationships, finances, or health from alcohol or other drug use. It's helpful to think of alcohol and drug use as a spectrum—if helpful use is at one end and harmful use is at the other end, there are varying levels of both in the middle.
- *Coping with Loneliness*: loneliness is an experience that means our current close relationships do not meet our needs. Despite the name, you do not always have to be alone to feel lonely. Loneliness can come up whenever we feel alone, unwanted, or isolated.
- *Depression and Bipolar Disorder*: we all experience changes in our mood. Sometimes we feel energetic, full of ideas, or irritable, and other times we feel sad or down. But these moods usually don't last long, and we can go about our daily lives. Depression and bipolar disorder are two mental illnesses that change the way people feel and make it hard for them to go about their daily routine.
- *Eating Disorders*: every day, we are surrounded by different messages from different sources that impact the way we feel about the way we look. For some,

poor body image is a sign of a serious problem: an eating disorder. Eating disorders are not just about food. They are often a way to cope with difficult problems or regain a sense of control. They are complicated illnesses that affect a person's sense of identity, worth, and self-esteem.

- *Feeling Angry*: we all feel angry sometimes. Most of the time, we can deal with feelings of anger or irritability quickly. We may resolve the situation or look at the problem from a different perspective. However, anger can cause problems in our lives and the lives of those around us.
- *Getting Help*: some people worry about asking for help because there can be a stigma around mental health problems. They may believe that asking for help means admitting that something is wrong. Some people worry about how others might see them. Asking for help means that you want to make changes or take steps towards your new health goals. We should celebrate the courage it takes to speak up and make changes. Getting help is part of recovery.

#### 4. *Food Safety*

Food safety in Ontario is shared by all levels of government—federal, provincial and municipal. There are three ministries responsible for food safety in the province:

- *Agriculture and Food*: dairy and meat inspection programs
- *Health and Long-Term Care*: protection of public health and setting food safety standards
- *Natural Resources*: fish and plants harvested in Ontario

#### *Causes Food Poisoning*

You and your family can get food poisoning when you eat contaminated food. You cannot smell or see these toxins. But they multiply quickly and can make you sick. Seniors, young children, pregnant women and people with weakened immune systems, are more likely to become sick.

#### *Signs and Symptoms of Food Poisoning*

Contaminated food can make you sick anywhere from hours to weeks after eating it. Most people get sick within a couple of days. You may have food poisoning if you have some or all of these symptoms:

- Upset stomach with nausea, vomiting, stomach cramps, stomach pain
- Diarrhea
- Fever

#### *What to do if you Think you Have Food Poisoning*

- Seek medical care as soon as possible
- Notify your local public health unit immediately

## *How to Make a Complaint about Food Safety*

Contact your local health authorities for concerns about:

- Restaurant or Food Service
- Retail Food Store

### *5. Active Living*

People who are physically active live longer and healthier lives. They are less likely to develop heart disease and other chronic health problems. Regular physical activity leads to a better quality of life. Ontario's public health units offer programs that can help you learn to eat healthier, be more active and prevent chronic diseases.

#### *Exercise Tips*

- Walking is a great way to explore your neighbourhood—you can find new places to get active and have fun
- Discover more than 330 Provincial Parks in Ontario
- Take a walk on Ontario's trails
- Find provincial recreation organizations that can help you pursue your favourite sport or activity
- See what programs are offered through local community and recreation centers

#### *Movement Guidelines*

The *Canadian Society for Exercise Physiology* has set out physical activity guidelines that tell you how often you should exercise. Physical activity is a foundation for a healthy lifestyle. Yet increasingly we are seeing that Canadians of all ages are choosing sedentary activities instead of active ones. Maintaining a healthy lifestyle, with the right balance of physical activity and rest, plays an important role in Canadians' overall health, well-being, and quality of life, regardless of age. Canada has developed 24-Hour Movement Guidelines, providing guidance on the optimal amount of physical activity, sedentary behaviour, and sleep—and the best combination of these behaviours—for Canadians of all ages:

- *Early Years (0-4 years of age)*: Canadian kids aged 4 and under are spending too much time in front of screens, which prevents them from meeting new movement behaviour guidelines.
- *Children and Youth (5-17 years of age)*: the first evidence-based guidelines to address the whole day. Kids are inactive and may be losing sleep over it. They are not moving enough to be tired, and they may also be too tired to move.
- *Adults (18-64 years of age)*: should participate in a range of physical activities (e.g., weight bearing/non-weight bearing, sport and recreation) in a variety of environments (e.g., home/work/community; indoors/outdoors; land/water) and contexts (e.g., leisure, transportation, occupation, household) across all seasons.

Adults aged 18-64 years should limit long periods of sedentary behaviours and should practice healthy sleep hygiene (routines, behaviours, and environments conducive to sleeping well).

- *Adults (65+ years of age)*: should participate in a range of physical activities (e.g., weight bearing/non-weight bearing, sport and recreation) in a variety of environments (e.g., home/work/community; indoors/outdoors; land/water) and contexts (e.g., leisure, transportation, occupation, household) across all seasons. Adults aged 65 years or older should limit long periods sedentary behaviours and should practice healthy sleep hygiene (routines, behaviours, and environments conducive to sleeping well).

## 6. Sleep

Sleep is an essential function that allows your body and mind to recharge, leaving you refreshed and alert when you wake up. Healthy sleep also helps the body remain healthy and stave off diseases. Without enough sleep, the brain cannot function properly.

Current recommendations for sleep are:

- *Adults (18-64 years of age)*: 7-9 hours of sleep/night
- *Adults (65+ years of age)*: 7-8 hours of sleep/night

### *Facts about Sleep (2019)*

- 1 in 4 adults aged 18-34 are not getting enough sleep.
- 1 in 3 adults aged 35-64 are not getting enough sleep.
- 1 in 4 adults aged 65-79 are not getting enough sleep.
- 1 in 2 adults have trouble going to sleep or staying asleep.
- 1 in 5 adults do not find their sleep refreshing.
- 1 in 3 adults have difficulty staying awake during waking hours.
- Adults who get insufficient sleep report an average of 4.0 hours of sedentary time a day compared to an average of 3.5 hours for adults who get adequate sleep.
- 36.3% of adults who get insufficient sleep report having chronic stress compared to 23.2% of adults who get adequate sleep.
- 12.3% of adults who get insufficient sleep report having poor mental health compared to 5.8% of adults who get adequate sleep.

### *Tips for Better Sleep*

- Avoid alcohol, caffeine, and nicotine before bed
- Maintain a regular bedtime/waketime
- Practice relaxation and mindfulness-based stress reduction techniques
- Reduce noise in the sleeping environment
- Exercise regularly
- Review medications with your physician/pharmacist regularly

## 7. Pregnancy

Having a baby is an exciting time that often inspires women to make healthier lifestyle choices and, if needed, work toward a healthy body weight.

### *Healthy Eating*

Consuming healthy foods and low-calorie beverages, particularly water, and the appropriate number of calories may help you and your baby gain the proper amount of weight. How much food and how many calories you need depends on things such as your weight before pregnancy, your age, and how quickly you gain weight. If you're at a healthy weight, the Centers for Disease Control and Prevention (CDC) says you need no extra calories in your first trimester, about 340 extra calories a day in your second trimester, and about 450 extra calories a day in your third trimester. You also may not need extra calories during the final weeks of pregnancy. Check with your health care professional about your weight gain. Each woman's needs are different. Your needs also depend on whether you were underweight, overweight, or had obesity before you became pregnant, or if you're having more than one baby.

### *Body Weight*

Gaining an appropriate amount of weight during pregnancy helps your baby grow to a healthy size. But gaining too much or too little weight may lead to serious health problems for you and your baby. According to experts, gaining too much weight during pregnancy raises your chances of developing gestational diabetes (diabetes during pregnancy) and high blood pressure during pregnancy. It also increases your risk for type 2 diabetes and high blood pressure later in life. If you are overweight or have obesity when you get pregnant, your chances for health problems may be even higher. You could also be more likely to have a cesarean section (C-section). Gaining a healthy amount of weight helps you have an easier pregnancy and delivery. It may also help make it easier for you to get back to your normal weight after delivery. Research shows that recommended amounts of weight gain during pregnancy can also lower the chances that you or your child will have obesity and weight-related problems later in life.

### *Physical Activity*

Almost all women can and should be physically active during pregnancy. According to current physical activity guidelines, regular physical activity may:

- Help you and your baby gain the appropriate amounts of weight
- Reduce backaches, leg cramps, and bloating
- Reduce your risk for gestational diabetes (diabetes during pregnancy)
- Reduce your risk for postpartum depression
- There is also some evidence that physical activity may reduce the risk of problems during pregnancy such as preeclampsia (high blood pressure during pregnancy),

reduce the length of labour and postpartum recovery, and reduce the risk of having a cesarean section (or C-section).

If you were physically active before you became pregnant, you may not need to change your exercise habits. Talk with your health care professional about how to change your workouts during pregnancy. Being physically active can be hard if you don't have childcare for your other children, have not exercised before, or do not know what to do. Keep reading for tips about how you can work around these hurdles and be physically active.

## Accommodations for Mental Health

There is no comprehensive list of accommodations for people who are dealing with mental health issues. Accommodations tend to be based on the individual needs of employees as well as on the resources available to the employer.

### *Accommodation Plans*

#### *1. Recognize the Need*

Can be initiated by the employee, or upon a need being noticed by a manager. Successful health needs assessments require a practical understanding of what is involved, the time and resources necessary to undertake assessments, and sufficient integration of the results into planning and commissioning of local services.

#### *2. Gather Relevant Information and Assess Individual Needs*

Collect information on the employee's functional abilities, not the disability. Sometimes, this will involve a medical professional providing the employee with a note listing limitations.

#### *3. Write an Individual Accommodation Plan*

Detail the limitations and the corresponding accommodations in a written form. Included in the write-up should be:

- Accommodations provided
- How to make information accessible to the employee
- Emergency information for the employee (such as contacts)
- When the plan will be reviewed

#### *4. Implement and Monitor the Plan*

After implementing the plan, it is important to regularly check in with the employee. Mental illnesses can change over time, and sometimes accommodations need to be updated to account for this.

### *Accommodation List*

There is no comprehensive list of accommodations for people who are dealing with mental health issues. Common accommodations for people with mental health problems include:

#### *1. Flexible Scheduling*

- Flexibility at the start or end of working hours to accommodate effects of medication or for medical appointments.
- Part-time shifts (which may be used to return a worker to a full-time position).
- More frequent breaks.

#### *2. Changes in Supervision*

- Modifying the way instructions and feedback are given.
- Having weekly meetings between the supervisor and employee may help to deal with problems before they become serious.

#### *3. Changes in Training*

- Allow extra time to learn tasks.
- Allow the person to attend individualized training courses

#### *4. Modifying Job Duties*

- Exchange minor tasks with other employees.

#### *5. Using Technology:*

- Allowing the person to use a lamp instead of fluorescent lights to eliminate a flicker that may be irritating or cause a reaction.
- Providing the employee with a tape recorder to tape instructions from a supervisor, training programs and meetings if they have difficulty with memory.
- Allowing an employee to use headphones to protect them from loud noises.

#### *6. Modifying Workspace or Changing Location*

- Allowing an employee to relocate to a quieter area where they will be free from distractions.
- Allowing an employee to work from home.

#### *7. Job Coach Assistance in Hiring and On-the-Job*

- A job coach may be someone from an outside agency that assists the employee in the workplace. Alternately, someone within the workplace, such as a peer or human resources staff person, might perform this role.
- The job coach can help in several ways such as assisting the person to fill out applications, helping them to reduce their anxiety by providing feedback, observing their work and making suggestions about accommodation.

## Legal Guidelines

### *Genetic Information and Disability*

Confidentiality and respect to our employees' rights are important to us. We will not:

- Use any genetic information and disability status to disadvantage our employees in any way.
- Use wellness incentives in exchange for genetic information or information on our employees' health condition(s) or that of their family's.
- Try to coerce employees into providing health/genetic information or taking medical examinations.

We will let employees know what health information we need for our wellness program, who will be able to see it and why. All data will be kept confidential, and our company will be able to access only aggregated data.

### *Voluntary Participation*

We encourage employees to participate in our wellness program, but their participation is voluntary. There won't be any punishment or adverse action for employees who choose not to use our wellness resources and program.

### *Incentives*

Any incentives that encourage employees to participate in our wellness programs will always be within legal guidelines. We will give the same incentive to all employees who participate in our wellness program, regardless of disability or health risk.

### *Design*

Our wellness program is designed with employee health in mind. It will not be unpleasant, too time-consuming, or require heavy spending by our employees. We can create personalized wellness plans for each employee. We always welcome ideas and suggestions for our employee wellness program.

## Responsibilities

### *Employer*

- Help develop and maintain an awareness of any internal and external practices that occur which could have an impact on employees' health.
- Identify practices and plan actions to help staff increase their awareness and knowledge on the identified health issues.
- Gather ideas and opinions from all employees regarding their health issues or concerns.

### *Participants*

- Gather ideas and opinions from other participants regarding their health issues or concerns.
- Communicate the information and recommendations back to the employer and other participants where necessary.
- Participate and contribute to decisions being made by the employer and other participants through consensus or the preferred method.
- Help facilitate the implementation of recommended activities across the company and participate in the tasks and activities arising from meetings, briefings, etc.

## References

World Health Organization (WHO)  
Canada's Food Guide – Tips for Healthy Eating  
Canada's Food Guide – Physical Activity and Healthy Eating  
Government of Ontario – Healthy Choices  
Government of Canada – Are Canadian Adults Getting Enough Sleep?  
Anxiety Canada – Tips for Healthy Eating  
Heart and Stroke Foundation – Healthy Living  
National Heart, Lung, and Blood Institute  
National Heart, Lung, and Blood Institute – Health Tips for Pregnant Women  
Canadian Mental Health Association  
Canadian Society for Exercise Physiology  
Centers for Disease Control and Prevention (CDC)  
Sleep Foundation



Document #COP02010059  
January 30, 2024



**Company Policy**  
*Corporate Social Responsibility (CSR)*



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## Objective

MGI Construction Corp. is committed to contributing to its community through environmental, ethical, and philanthropic initiatives. MGI's corporate social responsibility (CSR) is driven by MGI's values toward environmentally responsible practices and the people within our company, industry, and community. MGI conducts its business with these values in mind. This policy was written to provide all MGI decision-makers with a set of guidelines and best practices to refer to concerning MGI's ongoing corporate social responsibility initiatives. This ensures that MGI will not only provide tangible benefits to the community but will also enhance its corporate profile and public image.

## Scope

This policy applies to MGI Construction Corp. ("MGI"), its operating divisions, subsidiaries, and sponsored joint ventures collectively ("MGI").

## Practices

MGI is committed to making a difference in the community and environment it conducts business in. MGI recognizes the 'triple bottom line' (environmental, social, and economic) benefits of CSR initiatives which motivate MGI and its subsidiaries to conduct business in a safe, socially responsible, and ethical manner.

We continue to learn ways it can help both its environment and its community as MGI recognizes the need for vigilance and continuous improvement in the implementation and development of CSR practices. CSR values and environmental sensitivity must be continuously conveyed and reinforced to all MGI Construction employees to assist with meeting the above standards. MGI aims to lead by example in the area of CSR within its industry.

### *Human Rights*

We care about our employees and are dedicated to ensuring all employees have their fundamental human rights and needs met. This same value applies to all human life. MGI does this by ensuring all employees are paid livable wages, have a good work-life balance by granting flexibility in working hours when allowable, and works to ensure employees take good care of their mental and physical health by promoting health and wellness. MGI also works with the unions affiliated with their employees to bring employees all these rights and more.

MGI also strongly believes in inclusion and diversity which are woven into all aspects of MGI's business from recruiting to promotions to culture. MGI proudly employs people of all races, genders, cultures, religions, family statuses, and those with disabilities. MGI will take all necessary actions to make everyone working for and with MGI feel included, appreciated, wanted, and welcome.

## *Environment*

Our vision for the future is not just to demolish or build, but to do perform this work in an increasingly responsible manner. We embrace the notion that sustainable development and construction are norms.

Environmental sensitivity is a fundamental part of our mission statement and as such, everyone involved in the company has a role in ensuring that our activities are consistent with sound environmental management which are guided by the principles of sustainable development (i.e., expressed in applicable environmental legislation). MGI recognizes the importance of green building standards and will integrate Leadership in Energy and Environmental Design (LEED) standards into all applicable projects to create a positive effect on the environment and society at large.

MGI's belief in sustainable development is reflected through the various ways it implements eco-efficiency into its construction projects. We recognize there are interdependent links between environmental and economic sustainability and we are committed to strengthening our reputation as an environmentally conscious organization. MGI does this by participating in certification programs such as LEED as well as following all standards set by the Ministry of Environment and Climate Change and the Ministry of Labour.

Additionally, MGI will seek to endorse and deliver cleaner and more efficient energy solutions as well as integrate waste avoidance and reduction initiatives that focus on optimizing the efficiencies of space, time, and materials.

MGI is committed to helping the environment through waste management in all aspects of its business practices. This applies to our projects as well as our offices—such as recycling programs to collect all paper, cardboard, aluminum, and plastic containers; dry cell batteries; and printer and toner cartages. To produce less waste overall, MGI is committed to making the switch to more technology-based practices to reduce the amount of paper used during daily business. Using less paper helps the environment by reducing the need to cut down trees and the energy used to process them into paper and paper products.

## *Community*

MGI is dedicated to improving its community and building relationships within communities by contributing to the areas served by our company, either by our corporate involvement or through the services we provide. We aspire to have a positive impact wherever we conduct our business.

We will learn from, respect, and support the communities and cultures in which we conduct business. We aim to recognize and understand issues within the community in order to help improve and support it. To do this, MGI will integrate community investment considerations into its decision-making and business practices.

Many of MGI's socially-minded endeavors start with initiatives undertaken by our employees and focus on the specific needs of the local communities where we work. MGI supports charitable organizations, cultural and artistic groups, educational institutions, and other local and national non-profit organizations. MGI believes in being a responsible company from the inside out—based on a set of values and beliefs that are ingrained in our culture

## Responsibilities

### *Management*

- Ensure the full dissemination of this policy and share CSR success stories throughout the company.
- Ensure the day-to-day practice and enforcement of the processes outlined in this policy.
- Ensure good corporate citizenship in a manner consistent with applicable laws and regulations and requiring honesty and integrity from all employees.
- Inquire into causes employees care about and want to be involved in.
- Take personal pride and accountability in their role in management and respond to any report of behaviour that is inconsistent with this policy.
- Be familiar with this policy and appreciate the need for sensitivity to safety, environmental, social, and ethical considerations.
- All projects of significant value and/or that have an unusual risk profile must be subject to special review and approval.

### *Supervisors*

- Implement a detailed quality control plan as the primary tool to demonstrate and maintain compliance with all safety and environmental regulations and conditions of permits and approvals.
- Take all human rights issues brought to them seriously and implement plans and practices to ensure the issue is resolved and does not occur again.

### *Workers*

- Report any safety, environmental, and/or social concerns to the JHSC committee or management.
- Report any issues regarding human rights issues to the JHSC committee, human resources (HR), or management.
- Contribute to their communities through involvement in charitable, community service, and professional organizations

- Integrate CSR objectives into their operational and financial objectives.

## References

Canada Green Building Council  
Canadian Environmental Protection Act  
Government Of Canada – Leadership in Energy and Environmental Design (LEED) and  
Green Globes Design Building  
Government Of Canada – Environment and Climate Change Canada  
Environmental Protection Act (Ontario)  
The Ontario Human Rights Code





Document #COP02010060  
January 30, 2024



**Company Policy**  
*Information Technology (IT)*



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## Objective

To outline the proper use of MGI Construction Corp's information technology infrastructure (IT), including both software and hardware.

## Scope

The following policy applies to all employees using any IT hardware or software assigned to them by MGI Construction Corp on-site, off-site, or when working from home.

## Definitions

*Information Technology (IT)*: anything relating to computer hardware or software. This can include mobile phones, computers, computer peripherals, network attached devices, etc.

*LastPass*: the password management software used by MGI Construction Corp. This software allows administrators to share passwords with employees and allows employees to securely save passwords on their computers and mobile devices.

*Dropbox*: the file hosting service used by MGI Construction Corp. Dropbox is an access point to all company data.

*External Storage*: any storage device externally attached to a computer. This can include external hard drives, cloud storage, network-attached storage devices, USB thumb drives, etc.

*Backup*: an exact copy of data, stored on an external storage device.

## Procedure

### 1. Passwords

When creating or using passwords, every employee should keep in mind the following guidelines:

- All passwords for user logins must meet the following requirements:
  - Be randomly generated (this can be done in LastPass using the “Generate Password” feature)
  - Include at least one symbol (e.g., !@#\$%)
  - Include at least one number (e.g., 12345)
  - Include at least one upper case letter (e.g., ABCDE)
  - Include at least one lower case letter (e.g., abcde)
  - Be at least 12 characters in length

- LastPass is intended for company use only. Do not store personal passwords on LastPass.
- Only share passwords to other authorized users within the company using LastPass.
- Do not share passwords outside of the company.

## 2. *Devices*

Company devices hold valuable data that may be confidential or proprietary information.

The following are guidelines for the safe use of company devices:

- All employees are required to protect their company-assigned devices with a passcode. Users are permitted to change their passcode anytime they like, however, users are not permitted to remove their passcode.
- Employees must not leave devices unlocked and unattended in public areas.
- If a password is forgotten, the employee must contact management for recovery.

## 3. *Data*

The proper use of company data allows for efficient business collaboration between employees. Data can be stored and retrieved in various ways. The following are guidelines that will help an employee get the most out of the data infrastructure at MGI Construction Corp.

### *Dropbox*

All company data (excluding photos taken on mobile phones) should be stored on the MGI Construction Dropbox. No company data should be saved locally under any circumstances. All work in progress should be saved in the employee's personal Work in Progress (WIP) folder.

Employees are not allowed access to their Dropbox password and are not permitted to log in to Dropbox on any non-company device. If an employee requires access to Dropbox, they must request access from management.

### *Personal Data Storage*

Personal data should not be saved on the MGI Construction Dropbox.

Personal data saved to the company Dropbox will be automatically synced with other users with the same access. Privacy cannot be guaranteed for any personal file(s) uploaded to the company Dropbox.

### *Data Backup*

Employees are not permitted to create their own backups of company data. All data stored in the MGI Construction Dropbox is automatically backed up and stored indefinitely.

Employees are responsible for saving files on the MGI Construction Dropbox. Recovery of data stored outside of the MGI Construction Dropbox cannot be guaranteed.

### *Data Recovery*

In the event of data loss, an employee should contact a manager immediately for data recovery. Any data that was correctly uploaded to the MGI Construction Dropbox will be recoverable, however, the longer the time span between the loss of a file and the attempted recovery, the less likely the recovery attempt will be successful.

### *Email*

To use a company email address, certain precautions need to be taken to minimize the probability of downtime caused by potential security breaches or computer viruses.

The following are some general use guidelines when accessing a company email address:

- Do not use a company email address for personal use.
- Do not create personal accounts with your company email address as the username.
- Do not open attachments or links from unknown senders. Contact management if the safety of an email attachment or link is questionable.
- Do not modify the email signature. If any information in an email signature is incorrect, contact management.
- Do not knowingly send email attachments containing malicious files.

### *Sharing*

Under no circumstances may an employee share company data outside of business purposes align with job duties and responsibilities. Data created or accessed under MGI's devices, licenses, or access points (e.g., cellular network, log-ins) remain the property of MGI Construction Corp. This includes direct copies or slightly modified company data. All of the aforementioned is held under the company's non-disclosure agreement.

## **Responsibilities**

### *Management*

- Continually develop IT policy and procedures in accordance with best practices.
- Fill out disciplinary documentation, as required.

- Setup user accounts for employees and maintain correct access control.
- Setup and maintain backups of the entire MGI Construction Dropbox account, password database, and contact directory.
- Appropriately offboard employees, decommission hardware and unassign any software licenses.
- When possible, use two-factor authentication for administrative account logins.
- Provide support for employees having trouble with IT software and/or hardware.

### *Employees*

- Comply with company rules relating to the use of IT hardware and software.
- Contact a manager if a device is not functioning as expected.
- Contact a manager if you receive notification emails of unexpected login attempts to your user accounts.
- Report lost or stolen hardware or software security breaches to management immediately.





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**Company Policy**  
*Commuter Benefit Program*



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## Objective

To detail how employees can claim commuter benefits as part of the program, as well as to detail what type of expenses are covered. The *Commuter Benefit Program* aims to relieve employees of many of their commuting costs (pre-tax payroll deductions) while ensuring they can work closely as a team in the office and on-site as required.

## Scope

This policy applies to eligible MGI employees as a part of their total compensation package.

## What's Included

There are many ways you may commute to and from work. We want to ensure that whichever way you choose, you are covered. See below for all current eligible expenses:

- *Fuel (Gasoline/Diesel)*
- *Vehicle Maintenance*
  - *Oil change, brake servicing, tire rotation, etc.*
- *Public Transportation*
  - *Transit fare/pass*
- *Rideshare Services*
  - *Uber, Lyft, etc. commuting to and from work*
- *Vehicle Payments*
  - *Lease or finance payments to account for wear and tear on your personal vehicle*

## How to Submit Expenses

- Upload your receipt(s) for the month to a folder in your WIP → 000 – Revisit-Follow-Up → Commuter Benefit Program.
- All receipts need to be uploaded by the last Monday of the month to receive reimbursement for that month. All transactions must have taken place during the month you are submitting for them to be eligible for reimbursement. Late/missing receipt(s) cannot be used for the following month(s).
- You will receive a separate cheque on the last Thursday of the month for all commuter benefit expenses that were covered.

## How Much is Covered

Based on your position and years of service at MGI Construction, you will be given a specific monthly allowance for the Commuter Benefit Program. The monthly allowance



does not 'rollover' to the following month(s). You are not required to use all of this allowance. Any additional amount you spend will not be reimbursed for the month.





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January 30, 2024



Company Policy  
*Change Management*



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## Objective

The purpose of this policy is to outline how to manage change as a process to ensure when changes occur, hazards are assessed and addressed in a timely manner.

## Scope

The management of changes procedure applies to all MGI Construction Corp. employees.

## Definitions

*Hazard Analysis*: the process of conducting a systematic review of work activities to identify the hazards, analyze the risks associated with the hazards, and determine appropriate ways to eliminate or control the hazards.

*Ongoing Hazard Assessment* (e.g., PSA, FLHA, JSA, DHA): the process of conducting daily hazard assessments to address ever-changing site activities and conditions.

*Safe Work Practices (SWP)*: written methods outlining how to perform a task with minimum risk to people, equipment, materials, environment, and processes. These are set of guidelines or “dos and don’ts” on how to perform a specific task.

*Safe Job Procedures (SJP)*: the step-by-step instructions that must be followed in sequence in order to complete a task or process safely; a written, systematic description of how to complete a job safely and efficiently from start to finish. A safe job procedure must be developed for tasks that hold a risk level of 12 or higher.

## Procedure

When there is any change that affects the worksite or MGI employees, it is necessary to identify the change and conduct a hazard analysis to reduce or eliminate any associated risks. Types of change could include:

- Changes in legal requirements
- Significant changes in work processes, control measures, equipment, organization, work location
- Introduction of new products, processes, or services
- Introduction of new developments in occupational health and safety knowledge or technology

Once a thorough investigation is completed, updates to SWP, SJP, JHA, documentation and company policies must be communicated to all affected staff. If additional training is required, management should organize or deliver additional training.

## *Change Management Process*

### *1. Identify:*

- Identify the change that is occurring including changes in law, processes, equipment, new products, services, knowledge

### *2. Analysis:*

- Applying the Hazard Assessment, Analysis and Control Measures
  - Purpose: to proactively identify, control or eliminate potential or actual dangers in a job or task
  - Procedure steps:
    1. Breakdown of task into steps
    2. Identify actual/potential hazards
    3. Conduct a risk analysis for each hazard
      - a. Factors to consider: Accident frequency and severity, potential for severe injuries or illnesses, newly established jobs, modified jobs, infrequently performed jobs
    4. Preventative Maintenance/ Controls: Eliminate, Contain, Revise, Reduce Exposure
    5. Communicate New JHA to all workers
  - For additional information refer to the Hazard Assessment, Analysis and Control Policy.

### *3. Review:*

- Have management review the corrective action plans associated with the changes

### *4. Communicate:*

- Ensure all employees affected are informed of the changes, the associated changes to work processes and procedures and where to access additional support or training when needed.
- Changes made by management will be communicated to MGI employees. Where appropriate, MGI will organize up to date training for employees. Communication modalities will include meetings, toolbox talks, memos, postings, or email.

### *5. Document*

- Updated SWP, SJP and JHAs forms will be created and stored on the company's electronic database.

## **Responsibilities**

### *Management*

- Review JHA, SWP, SJP and corrective action plans before being implemented.

- Communicate any changes to legislation, products/equipment, work processes or sites.
- Communicate to supervisors and employees any changes to company policies, safe work practices and procedures.
- Ensure training is provided if needed.
- Provide the necessary resources to implement, support, and enforce the health and safety policy and program within the company.

### *Supervisors*

- Communicate all up-to-date information to workers.
- Communicate changes to worksite or work procedures to management for review.
- Perform job hazard analysis.
- Implement, support, and enforce the safety program to workers.
- Review safety aspects of each task with crew.

### *Workers*

- Report hazards or unsafe conditions to the supervisor after taking appropriate immediate action.
- Ensure training is up to date, ask for additional training if needed.
- Inspect equipment before use and report defects or damage to supervisor.

### *References*

Duties of employers – Occupational Health and Safety Act, s. 25, 26  
Duties of constructors – Occupational Health and Safety Act, s. 23  
Duties of supervisors – Occupational Health and Safety Act, s. 27  
Duties of workers – Occupational Health and Safety Act, s. 28



Document #COP02010069  
January 10, 2024



**Company Policy**  
*Personal Protective Equipment*



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## Objective

The purpose of this policy is to ensure that all employees receive, select, and know how to use the appropriate Personal Protective Equipment (PPE) to protect their health and safety while performing their assigned duties. The policy will outline how to inspect, care for, and assess the fit of applicable PPE. PPE is required to protect workers against hazards when other controls are not feasible or to supplement other controls.

## Scope

This policy applies to all MGI Construction Corp. staff, visitors, contractors, and suppliers. The type of PPE will depend on the jobs steps and associated potential hazards.

## Standards

Personal protective equipment must be worn where required. Signs will be posted to indicate the appropriate PPE. The maximum degree of protection offered by basic and specialized personal protective equipment will be achieved only if the equipment is right for the job, fitted properly, used properly, and maintained properly.

The following will be observed and practiced by all company employees regarding PPE:

- All employees and visitors will wear CSA approved hard hats, steel-toed protective footing, and high-visibility vests, as well as any specialty PPE required for a specific task.
- All PPE provided by MGI Construction will be within the requirements of the Occupational Health and Safety Act and Regulations.
- All PPE will be selected, used, and maintained per the manufacturer's instructions, specifications, and requirements.
- All PPE will be visually inspected before each use.
- Inspections as per regulations and manufacturer guidelines for PPE and safety equipment will be arranged by MGI (i.e., fall prevention equipment, fire extinguishers, atmospheric gas monitors)
- All PPE that is damaged or in need of service will be removed from service immediately.
- PPE shall not be used, modified, or changed contrary to the manufacturer's instructions.
- Any violation of the personal protective equipment requirements will result in disciplinary action.

## Eye and Face Protection

This procedure applies to any worker who may be exposed to eye or face hazards such as flying objects, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors or potentially injurious light radiation during work at MGI Construction Corp.

## Procedure

### 1. *Types of Eye and Face Protection*

**Safety glasses:** provides minimum protection for general working conditions where dust, chips or flying particles may present a hazard. They are available in a variety of styles and provide side protection in the form of shields or wraparound arms. Lenses should have an anti-fog treatment.

**Goggles:** provide higher impact, dust, and acid or chemical splash protection than safety glasses. Moulded goggles are suitable when workers are continually exposed to splash or fine dust and should have indirect venting.

**Face shields:** protect the full face from injury and they offer the highest impact protection and shelter from spraying, chipping, grinding, chemicals and blood-borne hazards. A face shield is considered a secondary safeguard to protective eyewear; it should never be worn without safety glasses or goggles.

**Welding goggles:** prevent exposure to harmful radiation when arc welding, gas welding, or burning. These protectors come in various shades and must be matched according to the line of work.

**Prescription Safety Glasses:** if you wear prescription glasses, check whether they qualify as safety eyewear. If not, action must be made to qualify both safety and prescription standards:

- Glasses must be CSA approved.
- Glasses must have side shields.
- Lenses must be made out of polycarbonate or plastic.
- Look for the manufacturer's logo moulded or etched into the top outside edges of the lenses.
- Look for "Z87" on the temple pieces.

### 2. *Proper Fit and Care*

In order to get the maximum benefit from safety eyewear, your glasses need to fit and must be kept clean and when not in use stored in a place where they are not being harmed.

#### *Fit*

- Ensure your safety eyewear fits properly. Eyewear should cover from the eyebrow to the cheekbone, and across from the nose to the bony area on the outside of the face and eyes. Eye size, bridge size and temple length all vary. Eyewear should be individually assigned and fitted so that gaps between the edges of the device and the face are kept to a minimum.
- Eyewear should fit over the temples comfortably and over the ears. The frame should be as close to the face as possible and adequately supported by the bridge of the nose.
- Users should be able to see in all directions without any major obstructions in their field of view.

### Care

- Clean your devices daily.
- Follow the manufacturer's instructions.
- Avoid rough handling that can scratch lenses. Scratches impair vision and can weaken lenses.
- Store your devices in a clean, dry place where they cannot fall or be stepped on. Keep them in a case when they are not being worn.
- Replace scratched, pitted, broken, bent or ill-fitting devices immediately. Damaged devices interfere with vision and do not provide protection.
- Replace damaged parts only with identical parts from the original manufacturer to ensure the same safety rating.
- Do not change or modify the protective device.

### Foot Protection

This procedure applies to any worker who may be exposed to a variety of injuries, impact, compression, and puncture during work at MGI Construction Corp.

### Procedure

#### 1. Selection of Footwear

Footwear must be chosen based on the hazards that are present. Assess the workplace and work activities for:

- Materials handled or used by the worker.
- Risk of objects falling onto or striking the feet.
- Any material or equipment that might roll over the feet.
- Any sharp or pointed objects that might cut the top of the feet.
- Objects that may penetrate the bottom or side of the foot.
- Possible exposure to corrosive or irritating substances.
- Possible explosive atmospheres including the risk of static electrical discharges.

- Risk of damage to sensitive electronic components or equipment due to the discharge of static electricity.
- Risk of coming into contact with energized conductors of low to moderate voltage (e.g., 220 volts or less).
- Type of walking surface and environmental conditions workers may be exposed to (e.g., loose ground cover, smooth surfaces, temperature, wet/oily, chemicals, etc.).

Also, evaluate the risk:

- to ankles from uneven walking surfaces or rough terrain;
- of foot injury due to exposure to extreme hot or cold;
- of slips and falls on slippery walking surfaces;
- of exposure to water or other liquids that may penetrate the footwear causing damage to the foot and the footwear;
- of exposure to rotating or abrasive machinery (e.g., chainsaws or grinders).

All jurisdictions in Canada require that workers wear adequate protection against workplace hazards. For workers exposed to foot hazards, the required protection is protective footwear certified by the CSA Group (CSA Standard "Protective Footwear", CAN/CSA-Z195-14). All working footwear, for both men and women, whether it is safety wear or not, should provide comfort without compromising protective value. Also, protective footwear should conform to CSA Standard CAN/CSA-Z195-14.

A steel toe cap should cover the whole length of the toes from tips to beyond the natural bend of the foot. A soft pad covering the edge of the toecap increases comfort. If the toecap cuts into the foot, either the size or style of the footwear is incorrect.

Soles come in a variety of thicknesses and materials. They need to be chosen according to the hazards and type(s) of flooring in the workplace. Uppers of protective footwear come in a variety of materials. Selection should take into account the hazards and individual characteristics of the worker's foot. A steel midsole that protects the foot against penetration by sharp objects should be flexible enough to allow the foot to bend.

No one type of non-slip footwear can prevent the wearer from slipping on every surface type.

## *2. Proper Fit and Care*

### *Fit*

- Try on new boots around midday. Feet normally swell during the day.
- Walk in new footwear to ensure it is comfortable.
- Boots should have ample toe room (toes should be about 12.5 mm from the front). Do not expect footwear to stretch with wear.

- Make allowances for extra socks or special arch supports when buying boots. Try on your new boots with the supports or socks you usually wear at work. Check with the manufacturer if adding inserts affect your level of protection.
- Boots should fit snugly around the heel and ankle when laced.
- Lace-up boots fully. High-cut boots provide support against ankle injury.

### Care

- Use a protective coating to make footwear water-resistant.
- Inspect footwear regularly for damage (e.g., cracks insoles, breaks in leather, or exposed toe caps).
- Repair or replace worn or defective footwear.
- Electric shock resistance of footwear is greatly reduced by wet conditions and with wear.
- Footwear exposed to sole penetration or impact may not have visible signs of damage. Replacing footwear after an event is advisable.

### Hearing Protection

This program applies to any worker who may be exposed to noise exposure that exceeds 85 decibels during work at MGI Construction Corp.

### Procedure

#### 1. *Types of Ear Protection*

- *Pre-molded Earplugs*: come in different sizes and shapes to fit different sized ear canals. They have virtually no expansion or contraction, so obtaining a good seal with the ear canal may be challenging.
- *Formable or Foam Earplugs*: when placed in the ear correctly, this type of earplug, will expand to fill the ear canal and seal against the walls. This expansion allows foam earplugs to fit ear canals of different sizes.
- *Earmuffs*: these devices fit against the head and enclose the entire perimeter of the external ear. The inside of the muff cup is lined with acoustic foam, which reduces noise. Their effectiveness depends on how tight the seal is between the foam cushion and the head.
- *Hearing Bands or Canal Caps*: these devices cover the ear canal at its opening. They do not provide as much of a seal inside the ear canal and generally provide less protection than earmuffs or plugs, so they are typically not recommended.

## 2. Selection of Hearing Protection

When selecting hearing protection, consider the following:

- Correctness for the job. Refer to the Canadian Standards Association (CSA) Standard Z94.2-14 "Hearing Protection Devices - Performance, Selection, Care and Use" or contact the agency responsible for occupational health and safety legislation in your jurisdiction for more information.
- It provides adequate protection. Check the manufacturer's literature.
- Compatible with other required personal protective equipment, or communication devices.
- Comfortable enough to be accepted and worn.
- Appropriate for the temperature and humidity in the workplace.
- Able to provide adequate communication and audibility needs (e.g., the ability to hear alarms or warning sounds).

## 3. Proper Fit and Care

### *Fit*

- Follow the manufacturer's instructions.
- With earplugs, for example, the ear should be pulled outward and upward with the opposite hand to enlarge and straighten the ear canal and insert the plug with clean hands.
- Ensure the hearing protector tightly seals within the ear canal or against the side of the head. Hair and clothing should not be in the way.

### *Care*

- Follow the manufacturer's instructions.
- Check hearing protection regularly for wear and tear.
- Replace ear cushions or plugs that are no longer pliable.
- Replace a unit when headbands are so stretched that they do not keep ear cushions snugly against the head.
- Disassemble earmuffs to clean.
- Wash earmuffs with a mild liquid detergent in warm water, and then rinse in clear warm water. Ensure that the sound-attenuating material inside the ear cushions does not get wet.
- Use a soft brush to remove skin oil and dirt that can harden ear cushions.
- Squeeze excess moisture from the plugs or cushions and then place them on a clean surface to air dry. (Check the manufacturer's recommendations first to find out if the earplugs are washable.)

## Respiratory Protection

This program applies to any worker who may be exposed to respiratory hazards during their course of work at MGI Construction Corp.

### Definitions

*Accepted respirator:* a respirator tested and certified by procedures established by the National Institute for Occupational Safety and Health (NIOSH).

*Air-purifying respirator:* a respirator with an air-purifying filter, cartridge, or canister that removes specific contaminants by passing ambient air through the air-purifying element.

*Atmosphere-supplying respirator:* a respirator that supplies the respirator user with breathing air/gas from a source independent of the ambient atmosphere.

*Fit test:* the use of qualitative or quantitative methods to evaluate the fit of a specific make, model, and size of a respirator on an individual.

*Hazardous atmosphere:* an oxygen-deficient atmosphere, exceeds occupational exposure limits, presents a fire/explosion hazard, and/or contains an airborne toxic or disease-producing contaminant in concentrations deemed to be hazardous.

*Immediately Dangerous to Life and Health Atmosphere (IDLH):* an atmosphere that poses an immediate threat to life, would cause adverse health effects, or would impair an individual's ability to escape.

*Quantitative fit test:* a test method that uses an instrument to assess the amount of leakage into the respirator to assess the adequacy of respirator fit.

*Qualitative fit test:* a pass/fail test method that relies on the subject's sensory response to detect a challenge agent to assess the adequacy of respirator fit.

*Respirator:* a device to protect the user from inhaling a hazardous atmosphere.

*Service life:* the period during which a respirator provides adequate protection to the user.

*User seal check:* an action conducted by the respirator user to determine if the respirator is properly sealed to the face.

*Tight-fitting facepiece:* a respirator inlet covering that forms a complete seal with the face. This includes a half-face piece that covers the user's nose and mouth under the chin; and a full facepiece that covers the user's nose, eyes, and mouth under the chin.

## Procedure

### 1. Types of Respirators

Two main types:

- air-purifying respirators (APRs)
- supplied-air respirators (SARs)

Air-purifying respirators (APR) can remove contaminants in the air that you breathe by filtering out particulates (e.g., dust, metal fumes, mists, etc.). Other APRs purify the air by adsorbing gases or vapours on a sorbent (adsorbing material) in a cartridge or canister. They are tight-fitting and are available in several forms:

- *Mouth Bit Respirator*: Fits on the mouth and comes with a nose clip to hold nostrils closed, for escape purposes only.
- *Quarter-Mask*: Covers the nose and mouth.
- *Half-Face Mask*: Covers the face from the nose to below the chin.
- *Full Facepiece*: Covers the face from above the eyes to below the chin.

Refer to the Safety Data Sheet(s) (SDS) when working with a new substance. The SDS will identify any respiratory protection required and should specify the type of respirator to be worn.

### 2. Selection of Respirator

- Workers shall be issued only those respirators for which they have been fit tested and medically approved.
- Where an IDLH atmosphere is identified, only pressure-demand self-contained breathing apparatus (SCBA) or a combination pressure-demand supplied-air respirator with auxiliary self-contained air supply, with a minimum rated service time of 15 minutes shall be used.
- Respirators approved for escape only shall not be used for non-emergency applications.
- Atmosphere-supplying respirators that make use of compressed air for breathing shall meet the standards set out in Table 1 of CSA Standard Z180.1-00, Compressed Breathing Air and Systems (March 2000).
- Atmosphere-supplying respirators that make use of ambient breathing air system shall have the air intake located under Appendix B of CSA Standard Z180.1-00, Compressed Breathing Air and Systems (March 2000).

Respirators shall be selected based on the following criteria:

- The health of the worker and the ability to wear a respirator
- Review of the hazard assessment

- Existing legislation and standards
- Work requirements and conditions
- Duration of exposure
- Characteristics and limitations of respirators
- Respirator assigned protection factors

### 3. *Respirator Fit Testing*

Workers must pass an appropriate quantitative or qualitative fit test when using a respirator with a tight-fitting facepiece.

A fit test shall be carried out:

- Before initial use of a tight-fitting respirator
- Whenever there is a change in respirator facepiece (make, model, or size)
- Whenever the employee reports or the supervisor makes visual observations of changes in the employee's physical condition that could affect respirator fit. Such conditions include, but not limited to:
  - Facial scarring
  - Dental changes
  - Cosmetic surgery
  - Obvious change in body weight
  - Facial rash (dermatological condition)

Fit test shall be performed only on workers who are clean-shaven where the facepiece seals to the skin.

When a worker is required to wear other personal protective equipment, such as eye, face, head, and hearing protection during his/her course of work, the same protective equipment shall be worn during the fit test to ensure that they are compatible with the respirator and do not break the facial seal.

When fitting a new respirator, try on several brands and sizes when possible. Different brands will fit slightly differently on your face. Move your head/face or make other movements to determine if the respirator is a good choice for you. The fit of your respirator should be evaluated periodically.

### 4. *Use of Respirator*

- Before being assigned any task that requires the use of a respirator, the worker shall complete all the health screening, fit testing and training requirements.
- Workers with facial hair that may interfere with the facepiece seal or valve function on tight-fitting respirators cannot use a tight-fitting respirator.
- Other personal protective devices or equipment shall not interfere with the seal of the facepiece to the face of the worker.

- Sidearms on eyeglasses or any other material such as hair, cloth, tissue, straps and jewelry shall not pass between the face and the sealing surface of the facepiece or interfere with the seal of the tight-fitting facepiece to the face or with the operation of the respirator. Workers who must have corrective eyewear, where the eyewear interferes with the respirator seal, shall be provided with respirator spectacle kits by their supervisor.
- The worker shall check the seal of the facepiece immediately after putting on the respirator.
- The worker should never break the respirator's face-to-facepiece seal to communicate.
- Workers shall not remove their facepieces at any time while working in an IDLH atmosphere.
- Workers shall be permitted to leave the hazardous area for any respiratory-related reason.
- The respirator shall not be altered in any manner. All cartridges, replacement parts, etc., shall be from the same manufacturer as the respirator.
- Where respirators are used for HAZMAT response, confined space entry etc., the appropriate existing legislation, regulations, standards and guidelines shall be consulted.

The worker shall leave the hazardous area if:

- The respirator fails to provide adequate protection
- The respirator malfunctions
- He/she detects air leakage around the face seal
- He/she detects an odour or tastes a chemical
- He/she has increased breathing resistance
- He/she experiences any illnesses or discomforts such as dizziness, nausea, weakness, breathing difficulties, sneezing, fever, chills, confusion, etc.
- He/she experiences extreme discomfort from wearing the respirator
- He/she needs to wash his/her face and facepiece to minimize skin irritation
- Components (including air tanks) or purifying devices need change-out

##### *5. Cleaning, Inspection, Maintenance and Storage of Respirators*

MGI Construction Corp. shall provide each worker requiring a respirator with a respirator that is clean, sanitary and in good working order.

- The respirator shall be cleaned and sanitized according to the respirator manufacturer's instructions.
- The frequency of cleaning shall depend on how many workers use the respirator and what it is used for.
- Respirators issued to individual workers shall be cleaned and disinfected as often as necessary to maintain proper hygiene.

- A single respirator issued to multiple workers must be cleaned and disinfected before each use.
- Respirators designated for emergency use only must be cleaned and disinfected after each use.
- The worker shall inspect his/her respirator before and after each use.
- The SCBA cylinders shall be inspected by a qualified person according to the requirements of CSA Standards CAN/CSA-B339 and CAN/CSAB-340, the appropriate CGA publications C-6, C-6.1, and C-6.2 the Transport Canada Regulations under the Transportation of Dangerous Goods Act, and the manufacturer's instructions.
- The emergency SCBA shall be inspected on a schedule to ensure readiness for the anticipated emergency use.
- The records of all inspections and services performed on an SCBA respirator and cylinder shall be maintained by the person responsible for the unit.
- The worker shall report defective or non-functioning respirators to his/her supervisor. These respirators shall be tagged and removed from service by the supervisor until repaired or replaced.
- Any respirator and cylinder repairs and subsequent tests and checks shall be performed by the unit manufacturer or by a qualified external contractor. Defective or nonfunctioning half-mask facepieces shall not be repaired but will be disposed of and replaced instead.
- The worker shall store their respirators in a clean and sanitary location. The respirators shall be stored in a manner that will protect them from dust, ozone, sunlight, heat, extreme cold, excessive moisture, vermin, damaging chemicals, oils, greases, or any other potential hazard that may have a detrimental effect on the respirator.
- When packed or stored, each respirator should be positioned to retain its natural configuration.
- Used cartridges/filters to be reused shall be stored in a manner to prevent contamination of the respirator facepiece.

Each worker issued a respirator shall properly maintain his/her respirator to retain its original effectiveness. The maintenance shall include:

- Cleaning and sanitizing
- Inspection and testing
- Proper storage

Repair and maintenance consist of those activities related to restoring a respirator to the manufacturer's original operating condition, including:

- Operation of the respirator;
- Care, cleaning, and inspection;
- End-of-service recognition;
- Change-out of filter elements;

- Replacement of air cylinders;
- Identification of problems;
- Storage;
- Removal from service; and
- Familiarity with and adherence to the manufacturer's instructions. This function requires that the individual maintain appropriate records. These activities can require a periodic proficiency review of the manufacturer's standards.

If there is any doubt about the correct type of protection for a specific material and operation, consult the manufacturer of the product, a supplier or manufacturer of respirators, or the CSAO.

## Head Protection

This program applies to any worker who may be exposed to overhead injuries such as dropped material, equipment tools, or working under heavy mobile equipment.

### Procedure

Safety headwear is designed to protect the head from the impact of falling objects, bumps, and contact with energized objects and equipment. It must be able to withstand an electrical contact equal to 20,000 volts phase-to-ground. A hard hat is mandatory to be worn at all times for every worker on an MGI construction project.

#### *1. Head Protection Specifications*

There are two types of CSA Group-approved hardhats:

- Type 1: offers impact and penetration protection to the crown only.
- Type 2: provides crown and lateral (side) impact and penetration protection.

#### *Classes and Make of Head Protection*

There are many designs but they all must meet CSA requirements for Class G rated for 2,200 volts (general usage); Class E rated for 20,000 volts (electrical trades); and Class C (conductive, do not offer electrical protection). The CSA standard for head protection is Z94.1 (most recent standard), Class E, and Type 1 & 2. Type 2 provides extra protection against side impact.

*Class E* hard hats come in three basic styles:

- Standard design with a front brim, rain gutter, and attachment points for accessories such as hearing protection.
- Standard design with a front brim and attachment points for accessories, but without a rain gutter.

- Full-brim design with attachment points for accessories and a brim that extends completely around the hat for greater protection from the sun.

### *Reversible Hard Hats*

A hard hat should only be worn in reverse only if:

- The hard hat has a reverse orientation mark.
- The job, task, or work environment necessitates wearing it backward (e.g., when wearing a face shield or welding helmet).

Most head protection is made up of two parts:

- The shell (light and rigid to deflect blows).
- The suspension (to absorb and distribute the energy of the blow).

Both parts of the headwear must be compatible and maintained according to the manufacturer's instructions. If attachments are used with headwear, they must be designed specifically for use with the specific headwear used. Bump caps or laceration hats are not considered safety helmets.

## *2. Care, Inspection and Maintenance*

### *Care*

- Proper care is required for headgear to perform efficiently. Its service life is affected by many factors, including temperature, chemicals, sunlight, and ultraviolet radiation (welding).
- Always consult the manufacturer's instructions for use and care instructions of your hard hat. You may also need to know which components of the hard hat must be inspected before each use.
- Clean the shell, suspension, and liner regularly with mild soap and water.
- Don't store your hard hat in direct sunlight—it will age quicker and can become brittle.

### *Inspection*

- Inspect the shell, suspension, and liner before each use. Look for cracks, dents, cuts, or gouges.
- If a hard hat is struck by an object, do not keep using it until a post-inspection deems it safe to use.
- Check the service life of your hard hat by reading the manufacturer's instructions.
- Never alter your hard hat by painting it, making holes in it, etc.

### *Maintenance*

- A hard hat's service life starts when it is placed in service.
- The "date code" stamped on the inside of your hard hat refers to the date of manufacture, not the starting date for useful service.

The following is a recommended replacement schedule:

- Hard Hat Suspension: replace after no more than 12 months;
- Entire Hard Hat - replace after no more than 5 years.

There are many things to look out for that might indicate a hard hat needs replacing, including:

- Expiration date
- Dents
- Scratches
- Cracks
- Painted
- Use of solvents
- Warped
- Scorched
- Taped together
- Exposed to excessive heat
- Excessive cold exposure

## Skin Protection

This program applies to any worker who may be exposed to injuries such as burns, cuts, scrapes, puncture wounds, radiation, chemical exposures, etc. during work.

## Procedure

Workers should wear proper hand and skin protection when working on site. On every construction project, workers are required to use the appropriate protection when there is a risk of injury from contact between the worker's skin and:

- A noxious gas, liquid, fume, or dust
- An object that may puncture, cut or abrade the skin
- A hot object, hot liquid or molten metal
- Radiant heat

Wearing hand/skin protection will reduce the exposure to physical, chemical and radiation hazards.

### 1. *Type of Hazards*

### Physical

Physical Work Conditions	Recommended Gloves
<ul style="list-style-type: none"><li>• Sharp edges of tools, material or equipment</li><li>• Splinters</li><li>• Heat</li></ul>	Leather gloves
<ul style="list-style-type: none"><li>• Light duty job</li></ul>	Cotton gloves
<ul style="list-style-type: none"><li>• Using power tools and equipment that causes vibration to the hand and arm</li></ul>	Anti-vibration gloves

### Chemical

Gloves and skin protection should be determined and worn according to the SDS of the chemicals used. An SDS for the chemicals used should be available at all locations for workers to easily access and refer to.

Caution: Common glove materials that are used on-site do not protect workers from all hazards. Gloves may dissolve due to the exposure of hazards.

### Ultraviolet

Workers who work outdoors are at risk of ultraviolet radiation. Long-term risks such as skin cancer and melanoma can be caused by exposure to sunlight, which is the main source of UV radiation.

The following are what workers can do to reduce the exposure of UV radiation:

- Apply SPF 30 sunscreen regularly.
- Add UV protection to the back of your neck by using a fabric neck protector that clips onto the hard hat.
- Wear clothing that covers as much of the skin as possible. Tighter woven material will offer greater protection.

Other PPE that can help reduce the exposure to physical, chemical and/or ultraviolet radiation hazards are:

- Coveralls
- High visibility vests
- Aprons

## 2. Care and Maintenance

- Follow the manufacturer's instructions.

- Check gloves and protective clothing for wear and tear.
- Ensure to provide management damaged gloves when receiving new gloves.
- Clean gloves and protective clothing to prevent debris development.

## Fall Protection

This program applies to any worker who may be exposed within 2m (6'6") of a fall hazard where a guardrail cannot be used during work at MGI Construction Corp.

## Definitions

*Personal Fall Protection Equipment:* an assembly of components including a full-body harness or safety belt (CSA approved), lanyard, lifeline, rope grab, and adequate anchorage which must be worn in the event where work must be completed within 2m (6'6") of an unprotected surface edge.

*Travel Restraint System:* a system that allows the worker to conduct work close to the surface edge of the building while preventing a fall hazard. It is a fall prevention method and cannot be used as a fall-arrest. The worker wears a full-body harness attached to an adequate anchorage point of a building's permanent fixture.

*Fall restricting System:* a fall arrest system designed to limit the free-fall distance to no more than 0.6metres (1'11"). Fall restricting systems are mainly used with ladder applications in a confined space, telecommunications, crane installations, utilities, etc.

*Fall Arrest System:* a means of protection after the fall or to control the severity of the fall's force. The system cannot prevent a fall from occurring. It must be maintained, supervised, and in good condition. The worker must not fall hitting an object, the ground, or bring them to a level beneath when a fall arrest system is in place.

## Procedure

### 1. *Classes of Harnesses (5)*

The Canadian Standards Association (CSA) regulates the classifications for full-body harnesses. A harness can have more than one classification, however, all full-body harnesses must meet the requirements for Class A Fall Arrest.

- *Class A Fall Arrest*

Class A harnesses are designed to protect workers when they are 6' or more above the ground. They support the body during and after a fall. Dorsal (back) D-rings are used for fall protection. They slide on impact, keeping the worker in an upright position.

- *Class AD Suspension and Controlled Descent*

Class AD harnesses are used to support and hold a worker while being raised and lowered. There is one sternal (front) D-ring and one dorsal (back) D-ring. The sternal D-ring is used for attachment to a descent device.

- *Class AE Limited Access*

Class AE harnesses are designed to raise or lower a worker through a confined area. Shoulder D-rings serve as anchorage points for attaching an extraction yoke or other rescue devices. The D-rings slide on the shoulder strap for the optimal positioning of the worker.

- *Class AL Ladder Climbing*

Class AL harnesses are designed for use with a certified fall arrester that travels on a vertical lifeline or a rail. Sternal (front) D-rings are used for attachment to the vertical system.

- *Class AP Work Positioning*

Class AP harnesses will hold and sustain a worker at a specific location, allowing full use of the hands, while limiting any free fall to two feet or less. Slide D-rings at waist level are used for positioning and restraint.

*Recommended Units:*

*Full Body Harness:* a full-body harness is used to stop a worker from an accidental fall in an upright position by equally distributing the weight through the shoulder straps of the leg and shoulder. The assembly of the harness provides suspension support to the upper body. In the event of a fall, the harness provides enough support that it does not further let go or drop the worker. There are 6 components of a full-body harness: shoulder straps, chest straps, sub-pelvic strap, fall arrest D-ring, buckles and leg/thigh straps.

*Carabiner (D-clip):* the carabiner is a personal fall protection device made to remain completely closed while linking components. Opening the keeper requires two steps: twisting and pulling the locking mechanism back. The shape of the carabiner is an oblong ring and self-locks on the components it adjoins when pushed back. The spring mechanism loaded inside the gate helps it lock.

*Lanyard/Shock Absorber (Energy Absorber):* a lanyard connects a full-body harness or safety belt to a rope grab that connects with a lifeline or anchor. It is a flexible and sturdy rope line made of wire, synthetic, or webbing. The lanyard must be CSA Standard approved and come from manufactured sources only. The lanyard associated with a shock absorber shall be used in a fall arrest system. During a fall, a shock absorber reduces the impact applied to the worker. A shock absorber can come either previously

attached to the lanyard or separately when bought in standard size or for heavier use. A lanyard with a built-in shock absorber must have a constant diameter or range.

*Lifeline*: a piece of steel wire rope or synthetic fibre that assists as a component of fall arrest. The lifeline connects the fall arrest or travel restraint system to an adequate anchorage point.

*Snap Hook*: the lanyard connects to the full-body harness and lifeline with a snap hook. The bottom keeper of the snap hook has a spring mechanism that needs to be lowered inside the hook to create an opening to connect, otherwise, it remains locked. To prevent unplanned rollouts of adjoining ends, snap hooks must be enforced. Snap hooks that do not lock must not be used.

*Not Recommended Units*:

*Grab Hook*: a grab hook connects components needed to make a personal protection system. However, grab hooks do not close completely on the equipment it connects. This is not recommended equipment and although available, must not be used according to CSA requirements.

*Safety Belt*: a safety belt is worn around the waist. The belt must function as per its intended use. It must not be used as a fall arrest method.

## 2. Selection of Shock Absorber

The force required to deploy a shock absorber must be at a minimum of 6 kilonewtons (1,349 pounds). The force of the shock absorber shall not be greater than the used material's allowable unit stress. This is applicable if the shock absorber, a component of the lanyard, is used in the fall arrest system.

A fall arrest system must be capable of supporting a minimum of 8 kilonewtons in static force without going over the allowable unit stress for each material used.

With a shock absorber, a fall arrest system must be capable of supporting a minimum static force of 6 kilonewtons without exceeding the allowable unit stress for each material used.

## 3. Horizontal and Vertical Lifelines

There are requirements to protect horizontal and vertical lifelines while in use. Both require the design of a professional engineer and must follow CSA standards. All types of lifelines must be free from splices or knots unless the knots are used for fixed supports. A complete design copy of the lifeline used must be available on site.

*Vertical Lifeline*

- 16mm synthetic rope (typical use)
- One person to use at a time
- Reach the surface or level above
- Positive stop to prevent run offs from the lifeline's end (e.g., rope grab)

#### *Horizontal Lifeline (Standard Design/Site Specific)*

- The design must indicate arrangements, components, anchorage points, and all loads used
- All required components must be listed
- Indicate the number of workers allowed to use one lifeline at a time
- Clear instructions are given for inspection, installation, and maintenance

#### *Lifeline Protection*

- Free of splices or knots
- Free from areas exposed to chemicals, gasoline, or objects
- Discoloration, frailty, brittle
- Sun exposure, extreme heat, friction from normal movement
- Damages with rough, abrasive surfaces
- Work requiring flame or welding

#### *4. How to Put On/Take Off Personal Fall Arrest Equipment*

The following steps are required to put on and take off personal fall arrest equipment that allows for easy use, storage, and maintenance.

##### *Put On Steps*

1. Hold the harness by the back of the D-ring and then shake, allowing all the straps to fall into place.
2. Unbuckle the waist strap and release the leg, chest, and shoulder straps if not already done so.
3. Put the straps over the shoulders, so the D-ring is in the back's middle between the shoulder blades.
4. Fasten both legs straps, then the waist strap.
5. Fasten chest strap by making sure the shoulder straps are firm and positioned to the center of your chest.
6. Fasten all the buckles ensuring the harness is tight but comfortable.
7. Use the snap hook to connect the D-ring of the harness to the lanyard.

##### *Take Off Steps*

1. Unfasten all the buckles.
2. Loosen all the straps of the harness including the leg straps, chest straps, and waist straps.

3. Extend all the straps out so that it is easier for the next person to put on.
4. Take off the harness and lay on a clean surface.
5. Fold each leg strap into the waistband then the shoulder straps.

#### *5. Set-up, Use, Maintenance and Storage*

MGI Construction Corp. will provide workers with appropriate fall arrest or travel restraint equipment. There are steps required to properly set-up, use, maintain, and store travel restraint and fall arrest equipment. These steps allow the worker to safely use the components required for personal fall protection. The following guidelines shall be maintained on an everyday basis and reviewed by a competent person on an ongoing basis.

#### *Harness*

- Chest-strap must be comfortable and in the middle of the worker's chest
- Leg strap (worker's fist can comfortably go between the strap and leg)
- Adjust harness straps to put D-ring between the shoulder blades

#### *Carabiners*

- Made not to disconnect under twist loads

#### *Lanyard*

- Manufactured and to specific lengths
- The lanyard must not be made smaller by making knots
- Knots can reduce the effectiveness of a lanyard
- Do not store near chemicals, wet places, or sharp objects
- Prevent exposure to sunlight
- One D-ring cannot link two lanyards
- Use Y lanyards if two must be used

#### *Lifelines*

- The lifeline's set-up with the shock absorber in the overall system requires the manufacturer's instructions (e.g., horizontal position)
- A vertical lifeline to be used by one person only
- Free of splices or knots (unless knots used for fixed supports)
- Always store separately and do not store with chemicals, gasoline, or objects

#### *Rope Grab*

- Manufactured to a specific diameter
- Manufactured to a particular lifeline (compatibility)

- Correctly attached to the lifeline so that it is not inverted
- Indicated arrow denotes the direction of attachment to lifeline
- Each rope grab is designed for use with a specific length of lanyard (normally 2' or 3' maximum)

#### *Snap Hook/Grab Hook*

- Must close completely
- Do not attach one snap hook to another
- Must be connected to a compatible hardware
- Ensure snap hook spring has enough tension power to close the keeper

#### Documentation & Communication

PPE requirements for job tasks are outlined in Job Hazard Analyses (JHA), Safe Work Practices and Safe Job Procedures documents. These documents should be reviewed with workers before commencing work on the site and when a change occurs. Supervisors should go through site hazards and appropriate PPE before beginning work for the day. Toolbox talks will be given to refresh workers about the proper selection, care and fit for different types of PPE.

On the JHA form applicable to the site, there is a section for PPE inspection. If there are any defective items, workers need to tag it for repair/maintenance and report it to the supervisor. Never use defective and/or damaged items. If PPE supply is running low or damaged, management needs to be made aware to replenish supply. Management will ensure that appropriate PPE is provided to workers where needed.

#### Responsibilities

##### *Management*

- Ensure appropriate PPE is provided to all workers.
- Ensure supplies are replenished as required.

##### *Supervisor*

- Ensure PPE is worn by all workers when required.
- Ensure PPE are used properly by all workers on site.
- Ensure PPE is stored, cleaned, and maintained properly.
- Review PPE compliance problems and requirements in safety meetings with all workers.

##### *Worker*

- Participate in personal protective equipment training when applicable.

- Be informed of all hazards and potential hazards on a project.
- Not to remove or make ineffective any protective device required by the regulations or by the employer.
- Store, clean, and maintain PPE properly.

## References

Duties of employers – Occupational Health and Safety Act, s. 25, 26  
Duties of constructors – Occupational Health and Safety Act, s. 23  
Duties of supervisors – Occupational Health and Safety Act, s. 27  
Duties of workers – Occupational Health and Safety Act, s. 28  
Responsibilities for Fall Protection Plan (General) – CCOHS





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## Company Policy *Controls*



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## Objective

MGI Construction Corp. is committed to identifying and controlling potential or actual hazards.

## Scope

This procedure applies to all employees at MGI Construction Corp.

*Note:* Hazard analyses for routine tasks performed by company employees can be found in the *Job Hazard Analysis*.

## Definitions

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

*Risk:* a risk is the combination of the likelihood of the occurrence of the harm and the severity of it.

*Task:* an activity performed to fulfill a job.

*Hazard Analysis:* the process of conducting a systematic review of work activities to identify the hazards, analyze the risks associated with the hazards, and determine

*Ongoing Hazard Assessment* (e.g., PSA, FLHA, JSA, DHA): the process of conducting daily hazard assessments to address ever-changing site activities and conditions.

## Procedure

Controls are measures taken to help reduce or eliminate the risk of injury or illness in the workplace. Identifying controls is part of the hazard analysis procedure. All work processes require controls to be implemented when there is a risk of injury or illness. When a new task is introduced to the workplace or an existing task must be modified, the following steps are to be followed to complete a Job Hazard Analysis:

1. *Breakdown of Task into Sequential Steps*
2. *Identify Hazards Associated with Each Step*
3. *Identify Preventative Controls for Each Hazard*
4. *Communication of Job Hazard Analysis*
5. *Validation and Evaluation*

## Implementing Controls

The hierarchy of controls is used to determine which actions are best to control exposure to hazards. The preferred order is as follows:

1. *Elimination*: Remove the hazard from the workplace.
2. *Substitution*: Replace hazardous materials or equipment with less hazardous ones.
3. *Engineering Controls*: Includes designs or modifications to equipment and processes that reduce the source of exposure.
4. *Administrative Controls*: Controls that alter the way the work is done, including the timing of work, policies and other rules, and work practices such as standards and operating procedures (including training, housekeeping, and equipment maintenance, and personal hygiene practices).
5. *Personal Protective Equipment*: Equipment worn by individuals to reduce exposure such as contact with chemicals or exposure to noise. This is the least effective means of controlling a hazard.

Preventative controls must be implemented for each identified hazard and be readily available at the point of use. Where controls should be implemented are as follows:

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

Management and supervisors are responsible for ensuring all work is safely planned prior to beginning the job. This is done by performing a hazard analysis. A JHA is required for all identified hazards, that include controls in place to reduce the risk of injury or illness. If there is not an applicable JHA for work tasks or the worksite, management is responsible for creating a new JHA and approving controls. Worker feedback is encouraged when developing and reviewing controls. Worker feedback is recorded in weekly site inspections.

Supervisors need to do continuous site inspections and workers are required to report any potential hazards so that corrective action plans can be developed and JHAs can be revised to be more suitable and safer for the job. All controls need to be applicable with legislative standards and regulations, and manufacturers guidelines.

Workers need to be familiar with all hazards associated with the job and must review the JHA before beginning work to be compliant with all health and safety policies associate with the job.

## Communication

Controls need to be communicated to all affected employees on the job. Supervisors must discuss JHAs with workers performing the job to ensure that all steps are in the correct order and have suitable controls. Workers are encouraged to participate and raise awareness of possible deficiencies in the JHA. Workers are required to sign the JHA form to indicate that they understand and will work in compliance with the procedures. Workers should not sign until they understand and are asked to seek clarification, if required.

Management will communicate, to applicable workplace parties, if there are any changes to legislation, the job site, the work being performed or updates to JHAs through email and/or meetings. Supervisors should discuss the changes and updates during toolbox talks.

## Responsibilities

### *Management*

- Support the development of job hazard analysis.
- Allocate the resources and assign the team to participate in the development process.
- Review worker, supervisor, and JHSC recommendations and update the practices if required.
- Respond to the recommendations in a timely manner.
- Communicate the potential hazards of tasks to all workers.
- Follow up with implemented controls to ensure effectiveness.
- Communicate any new hazard analyses or any update to existing analyses.
- Review the job hazard analysis at least annually.

### *Supervisors*

- Ensure their workers have reviewed the job hazard analysis of the task that relates to their specific workplace and tasks prior to commencing the work.
- Ensure workers understand the potential hazards specified in the job hazard analysis for applicable tasks and can describe them during toolbox talks, worker interviews during inspection, etc.
- Review comments/concerns of the workers regarding the job hazard analysis with the Management or JHSC and provide recommendations.
- Monitor the existence of the job hazard analysis by site observations.
- Ensure the job hazard analysis is readily available to workers.

### *Workers*

- Review and understand the job hazard analyses that are related to their specific job or line of work.
- Review the task prior to beginning the job to understand the potential hazards of the job.
- Report concerns or suggested changes to the job hazard analysis to supervisor or JHSC.

### *Joint Health and Safety Committee*

- Participate in the development and review of job hazard analysis.
- Discuss supervisors or workers' feedback in the meetings.
- Recommend the required changes to the management.

### *Health and Safety Representative*

- Participate in the development and review of job hazard analysis.
- Recommend changes to the management.

### References

Duties of employers – Occupation Health and Safety Act s. 25, 26  
Duties of constructors – Occupation Health and Safety Act s. 23  
Duties of supervisors – Occupation Health and Safety Act s. 27  
Duties of workers – Occupation Health and Safety Act s. 28  
Health and Safety Representative – Occupation Health and Safety Act s. 8  
Joint Health and Safety Committee – Occupation Health and Safety Act s. 9



Document #COP0201006  
January 30, 2024



**Company Policy**  
*Disconnecting from Work*



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## Objective

MGI Construction Corp. is committed to fostering a workplace culture that leads to a healthy work/life balance. To ensure this, MGI Construction Corp. encourages employees to disconnect from work when their working hours are complete.

## Scope

This policy applies to all MGI employees, regardless of position or employment type. The Employment Standards Act (ESA) required all employers with over 25 employees to have a written Disconnecting from Work policy in place. MGI Construction is committed to following all regulations laid out in the ESA.

## Definitions

*Disconnecting from work:* to be free from work. This means not engaging in work-related communications, including emails, telephone calls, video calls or sending or reviewing other messages, or anything else that could reasonably be considered work.

*Employee:* individuals working on-site, in the office, working from home, on probation, on leave of absence, on strike or lockout, in training, working full or part-time, on contracts of any length, laid off (unless the employment relationship has been terminated).

*Hours of work:* typically, from 7:00 am – 5:00 pm or 9:00 am – 5:00 pm. This can change depending on the position and if otherwise agreed upon. Note: an employee's hours of work are outlined in the employee's offer of employment or collective agreement.

*Personal time/outside of work hours:* time outside of daily work hours as well as any sick days, vacation days, or leave of absence that is taken.

*Emergency:* a serious, unexpected, or dangerous situation. Such as when someone's security, health, or a major business function is threatened without immediate action.

## Procedure

### 1. Devices

Employees are not required to answer work devices outside of the agreed-upon hours of employment according to their offer of employment or collective agreement.

Employees are allowed to turn off all work devices, including but not limited to their work phone, tablet, and laptop. These devices can be left off when they leave the work premise

and are not required to be turned back on until arriving at the work location the next working day.

Some leadership positions, such as management, may need to be available in case of emergencies. In these cases, where a manager must leave their device/s on, they are not expected or required to answer any non-emergency communications.

## 2. *Emails*

Employees are not permitted to connect their work emails to personal devices. This frees employees from any notifications related to their work email while they are off from work. Employees are encouraged to have an 'out-of-office notice' for when they are on vacation, sick, or out of the office for an extended period. Employees are encouraged to reach out to the IT department for assistance.

Managers are expected to have an 'out-of-office notice' on their email when they are on vacation, sick, or out of the office for an extended period. This 'out-of-office notice' must provide a way to contact them outside of work hours for emergencies only.

## 3. *Working from Home*

If employees are working from home, they are still expected to *work a normal workday (as defined in the employee's offer of employment or collective agreement)* and disconnect the same as office employees would.

## References

- Government of Ontario
- Canadian Centre for Occupational Health and Safety
- Employment Standards Act (ESA)



Document #COP02010070  
January 10, 2024



**Company Policy**  
*Procurement and Contractor Management*



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## Objective

To outline the procedure when procuring and managing contractors for MGI Construction Corp. Projects'. New contractors may create or be exposed to new hazards on the worksite. This procedure will discuss the procurement requirements and practices in place so hazards related to contractors can be assessed and controls can be implemented. This procedure will ensure that every contractor employed by MGI Construction Corp. is committed to working safely.

## Scope

The procedure applies to all contractors at MGI Construction Corp.

## Definitions

*Hazard Analysis*: the process of conducting a systematic review of work activities to identify the hazards, analyze the risks associated with the hazards, and determine appropriate ways to eliminate or control the hazards.

*Ongoing Hazard Assessment* (e.g., PSA, FLHA, JSA, DHA): the process of conducting daily hazard assessments to address ever-changing site activities and conditions.

*Competent worker*: has training, experience, knowledge and understanding of the work being done, possess a certificate of qualification, specific manufacturers training, or years of experience in the industry, is familiar with the Occupation Health & Safety Act and has knowledge about the potential or actual hazards for health and safety of the job.

## Procurement Process

Contractors must submit the following to management before arrival on an MGI Construction Corp. construction site:

- Form 1000
- Certificate of Insurance
- WSIB Clearance
- Health, Safety, and the Environment (HSE) Policy and Program
- Workplace Violence and Harassment Statement
- Safety Data Sheet(s) (submitted a minimum 72 hours before product delivery to the site)
- Job Hazard Analysis (e.g., Labour and Material Handling, On-Site and Off-Site Traffic) applicable to the project
- Safe Job Procedures (e.g., Critical Lift Procedure, Working at Heights Rescue Procedure) applicable to the project.
- MGI Construction Corp.'s Subcontractor Orientation
- Training records for all workers on-site:

- Workplace Hazardous Materials Information System (WHMIS) 2015
- Health and Safety Awareness (Supervisor/Worker)
- Hazard-Specific Training (e.g., Working at Heights, Elevating Work Platforms, Propane Use)

## Contractor Management

Once the procurement process is successful, MGI Construction Corp. will ensure that all site-specific health and safety requirements are put in place and that contractors exercise health and safety requirements ongoing for the duration of the project. Any violation to MGI Construction Corp. safety rules need to be documented by the supervisor and reviewed by management.

## Site Orientation

Before commencing work on-site, all contractors must complete MGI's contractor orientation. An orientation checklist will be completed, signed, and stored (See document #ONB01010008). Furthermore, MGI Construction Corp. will inform contractors of all job hazards on the worksite prior to starting. This will allow adequate time for contractors to make accommodations and create any new documentation required.

Each worker on-site must have a site tour to become familiar with the site layout and the location of items required for the job and health and safety.

## Requirements While on Projects

### *Daily*

Contractors are required to submit daily job hazard analyses (JHA) to the site supervisor. The contractor must be competent in performing a hazard analysis. This applies to hazards arising from their own work that may impact the organization's workers and from hazards arising from the organization that may impact the contractor's workers. The controls implemented must follow the hierarchy of controls and used where applicable.

The contractor must follow a JHA to address changes in the project or worksite. If there is a change in the project that requires different tasks or equipment, it is the responsibility of the contractor to provide relevant Safe Job Procedures (SJP) or Safe Work Practices (SWP).

See Company Policy for Job Hazard Assessment, Analysis & Control, and Controls for further information. If the contractor does not have a form to complete, they are to use MGI Construction Corp.'s JHA.

### *Weekly*

Every week, contractors will conduct a documented:

- *Toolbox Talk:* Once a week contractors need to hold a safety meeting on site. They are brief meetings to discuss a relevant safety topic to increase awareness levels. The topics need to vary weekly and be relevant to the work being done. The topic and attendance must be documented. It is an opportunity to discuss project updates, potential hazards and deficiencies, and concerns for safety. The goal is to facilitate communication and keep workers informed. In doing so, safety and productivity will be maximized.
- *Site Inspection:* Planned inspections by contractors must occur weekly on project sites. Inspections provide the opportunity to correct potential hazards before a loss occurs. Inspections will cover premises, job site, buildings, temporary structures, excavation, tools, equipment, machinery, methods, and practices as applicable. Any deficiencies found must be reported to workers and MGI supervisors. It must be documented on the Site Inspection document, and a corrective action plan must be put in place. Inspection reports will be reviewed during toolbox safety talks.

The documents must be submitted to the site supervisor before the end of each week.

## Performance Monitoring & Evaluation

Supervisors will provide updates to management regarding the contractors' compliance to MGI's HSE standards and work performance as needed or during joint health and safety meetings. A subcontractor monthly evaluation document (See document #HSE01010259) will be completed and submitted to MGI by the subcontractor. The document will be record of the subcontractor's equipment on-site, completed health and safety documentation, hours worked, disciplinary actions, incidents, and first aid administrations. Verbal updates and monthly submission documents will be used to evaluate the subcontractor's performance and compliance with the MGI's health and safety policies.

## Communication

Contractors must report any deficiencies, incidents and near misses that occur while working on an MGI Construction Corp. site immediately to the MGI site supervisor. When an investigation is required, the investigation report must be submitted to the site supervisor promptly. If applicable, the supervisor will report concerns to management.

Health and Safety concerns, and/or changes to safe work practices and procedures, and/or changes to company policies need to be communicated to applicable MGI staff and contractors. Communication can occur during toolbox talks, on the health and safety board, or email.

## Responsibilities

### *Management*

- Ensure all required documents are received from contractors before their commencement of work.
- Lead the coordination of site-specific health and safety requirements from supervisors, contractors, and workers
- Review and update policies and procedures as needed and ensure it is communicated to all appropriate workplace parties.

### *Supervisors*

- Collect required documentation from contractors on-site.
- Monitor the contractor's performance and discuss with managed as needed.
- Issue violations if required.

### *Contractors*

- Supply all required documentation before work and throughout the project.
- Abide by all MGI Construction Corp. health and safety rules, as well as related legislation.
- Respond to violation documentation promptly.
- Hold weekly toolbox talks and site inspections.

### *References*

Duties of employers – Occupational Health and Safety Act, s. 25, 26  
Duties of constructors – Occupational Health and Safety Act, s. 23  
Duties of supervisors – Occupational Health and Safety Act, s. 27  
Duties of workers – Occupational Health and Safety Act, s. 28  
Duties of Project Owners – Occupational Health and Safety Act, s. 30



Document #COP02010064  
January 10, 2024



**Company Policy**  
*Records and Documents*

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## Objective

To provide direction to track, manage, and store documents and records and assist with accuracy and due diligence.

## Scope

This procedure applies to all MGI Construction Corp. documents published or archived with intent or purpose to be company-wide or official internal or external documents.

*Note:* Draft documents, works in progress, or preliminary forms of documents (and similar) are not held to the same standard.

## Purpose

It is the responsibility of each employee, and contractor, to complete the necessary documentation for every activity or tasks that requires it. This includes any documentation required for procurement, orientation, worksite, equipment, incident reporting, safety meetings, training, inspections, checklists, toolbox talks etc. When this is accomplished, a detailed record is kept and will give an accurate depiction of where gaps exist in the company's objectives and health and safety program. Management can review the trends and develop corrective action plans. In addition, it can track employee conformity to MGI's standards and policies. This can help determine if additional training is required or if progressive discipline is appropriate. Lastly, it will provide a history of how the health and safety program has progressed over time and provide evidence to use in defense charges incase an incident occurs despite the company's efforts. The safety of employees and service providers is of the utmost importance to MGI Construction Corp.

## Documentation and Records

The Joint Health and Safety Committee (JHSC) will produce and determine what documentation is necessary as per the Ontario Occupational Health and Safety Act, other legislative requirements, regulations, manufacturer guidelines and health and safety objectives put in place by MGI Construction Corp. If external documentation is necessary to fulfill the requirements, the company will ensure it is readily available for use. Documentation and record keeping is a way to ensure due diligence for the health and safety of its employees, contractors, and visitors.

## Review

Documents will be reviewed by the JHSC and management before being approved for use. Documents and records will be reviewed at least annually to determine if updates are required or if certain documents should be created or withdrawn from practice. This will ensure obsolete documents are identified and removed from use. Any changes to documentation will be discussed, reviewed, and approved by management. This review

and revision process will be recorded using an electronic file database accessible to management. Person(s) involved in the review process will also be recorded. When revisions occur, previous versions will be held in archives for future reference when needed. Feedback from supervisors or workers is highly encouraged and taken into consideration when creating changes to documentation and records.

## Communication

Once updated documents are approved, it will be communicated to all affected employees through email, toolbox talks, memos, and health and safety meetings. If training is required to familiarize the employees with new documents, the management and the JHSC will arrange the training and document it. Accommodations will be made for those who require it to ensure everyone is aware of the changes and how to correctly complete the documentation.

Relevant documentation will be readily available on employee computers, tablets, and cellphones for point of use. All company data (excluding photos taken on mobile devices) should be stored on the MGI Construction Corp.'s cloud storage. Documents will be titled as appropriate and stored in appropriate computer folders for easy access. Documents can also be searched in the cloud. This will ensure that documents and records are legible and readily identifiable.

## Privacy and Confidentiality

Privacy and confidentiality protection is a requirement. Any documentation or records that include private or confidential information about an employee will be stored in a secure encrypted accounting software system or human resource app. Only certain individuals will be allowed access to private and confidential records if necessary for their job. Restricted access will be applied where possible. Those with access are required to maintain the privacy and confidentiality of all employees. All new employees are required to read and sign the confidentiality agreement (see form #ONB01010003). For additional security, passwords are managed by the IT department. See *Information Technology (IT) Policy* for more information. No sensitive information is physically stored in the office for security reasons.

## Responsibilities

### *Management*

- Review and approve use of documentation at least annually or as required.
- Inform employees of changes in documentation requirements, updates in existing documents or the removal of obsolete documentation
- Review recommendations from the JHSC regarding documentation, trends and conformity in health and safety.
- Ensure all documents are readily available for point of use.

### *Supervisors*

- Complete appropriate workplace documents.
- Inform workers of documentation requirements and ensure workers are compliant.
- Provide a copy of the completed documents to the JHSC or the Health & Safety Representative.

### *Workers*

- Complete appropriate reporting documents associated with job requirements.
- Provide recommendations to the supervisor on documentation requirements.
- Ensure documentation requirements are understood and ask supervisor for clarification if needed.

### *Joint Health & Safety Committee*

- Identify trends in health and safety documentation that need to be addressed to improve health and safety outcomes.
- Address documentation and records in the committee meetings.
- Make recommendations to management as required.
- Ensure that appropriate training is in place to familiarize employees with changes in documentation.

### *References*

Duties of employers – Occupational Health and Safety Act, s. 25, 26  
Duties of constructors – Occupational Health and Safety Act, s. 23  
Duties of supervisors – Occupational Health and Safety Act, s. 27  
Duties of workers– Occupational Health and Safety Act, s. 28  
Joint Health and Safety Committee– Occupational Health and Safety Act, s. 9

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