HEALTH & SAFETY POLICY MANUAL





HEALTH AND SAFETY POLICY STATEMENT

Zehr Group is committed to a strict Health & Safety Program that protects its Employees, Subcontractors, Customers, the General Public and Property from accidental and/or incidental losses.

Zehr Group Goals:

- No Accidents
- No Lost Time Injuries
- Shared WSIB Rebates

Zehr Groups Core Values:

- Integrity In all situations, do the right thing, no matter what.
- Innovation Constantly search out and implement best practices in all areas of our business.
- Sustainability Commit to long term success for generations to come.
- **Collaboration** look out for each other, have each other's backs, offer mutual empathy and support, be a team
- **Community** Create and support positive, vibrant places for people to live, work and enjoy culture of community

Our goals, aligned with Zehr Groups Core Values will provide and maintain a safe and healthy work environment accepted by industry practices and compliant with legislative requirements. We will strive to eliminate any foreseeable hazards, which may result in fires, security losses, damage to property and personal injury/illness.

Zehr Group believes that all accidents are preventable. Accidental loss can be controlled through good management in combination with active employee involvement. Loss prevention is the direct responsibility of company management and workers alike.

Zehr Group strives to provide proper and relevant employee training, job relevant safety practices, equipment operating and maintenance procedures. Zehr Group provides safety guidelines that focus Management, Employee and Subcontractor awareness on reducing the risk of accidents and/or incidents in all activities.

Zehr Group Management, Subcontractor Management and all Employees are collectively responsible to ensure compliance with Local, Government, Occupational Health and Safety and Environmental Regulations.

Active participation at all levels will ensure that our goals can be achieved.

I trust that you will join us in a personal commitment in implementing and enforcing our Health and Safety Program

John MacDonald President Zehr Levesque

Vim Dodd President/COO Zehr Group of Companies

January 04, 2023 Date

January 04, 2023

Date



WORKPLACE VIOLENCE AND HARASSMENT POLICY STATEMENT

Zehr Group is committed to providing a safe, healthy, and supportive work environment by treating our employees and clients with respect, fairness, and sensitivity.

Zehr Group recognizes that all workers have the right to work in a violence and harassment free workplace and is committed to maintain a safe work environment for our employees, subcontractors, clients, and visitors. We refuse to tolerate any acts of violence and/or harassment in the workplace and will not excuse behaviour that endangers the safety and health of our employees or subcontractors. This policy applies to all workplace parties involved in our projects.

Zehr Group requires prompt and accurate reporting to Management and/or Supervisors of any incident in which an individual has been threatened, assaulted, harassed, or abused; whether a physical injury has occurred. All occurrences will be investigated, and proper disciplinary measures will be taken. It is prohibited to retaliate against an individual who has reported an incident of violence and/or harassment. Individuals who engage in retaliation will be subject to disciplinary action. Appropriate measures will be taken concerning individuals who construct false claims of violence and/or harassment.

For the purposes of this policy workplace violence is defined as:

- 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; or,
- 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.

For the purposes of this policy workplace sexual harassment is defined as:

- Engaging in a course of vexatious comment or conduct against a worker in a workplace because of sex, sexual orientation, gender identity, or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome or
- Making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

Zehr Group will take every reasonable precaution to protect an employee from physical injury if we become aware, or believe, that domestic violence is a risk.

This policy ensures that all workplace parties adhere to work practices that are designed to make the workplace safer, and do not engage in physical actions or verbal threats that create a security hazard for others in the workplace.

John MacDonald

John MacDonald President Zehr Levesque

im Dodd

President/COO Zehr Group of Companies

January 4, 2023 Date

January 4, 2023 Date





CATEGORY:	Environmental Health & Safety	NUMBER:	EHS.30.01.101
SUBJECT:	Environmental Health & Safety Program	EFFECTIVE:	August 1, 2021
	Administration		_
REPLACES:	N/A	PAGE(S):	1 of 2

POLICY:

Zehr Group (ZG) is committed to the continual improvement of its Environmental Health & Safety Program (EHSP). In order to fulfill this, Senior Management, with the assistance of the Health & Safety Lead will conduct a health & safety program review at least once annually. Project Managers, Supervisors, the JHSC/Worker Health & Safety Representatives and Workers are all expected to participate and/or contribute to the annual review as requested.

As part of the annual review, a comprehensive internal audit of the EHSP will be performed to determine where deficiencies exist in the system and other areas for improvement. With the results of this audit, a "Corrective Action Items" list will be developed at the end of each year to lead improvements for the next year. This list will be communicated to all workplace parties, as well as any major changes made to the EHSP program.

Policies, procedures and roles and responsibilities will be reviewed annually for relevance and updated as seen fit. In keeping with our commitment, we will review and/or revise/develop specific Health and Safety responsibilities consistent with Occupational Health and Safety Act and Regulations for Construction Projects for; Senior Management, Managers, Supervisors, Workers, Subcontractors and Visitors to our sites. The intent of these annual reviews is for Senior Management to ensure that continual improvement is made by evaluating the sustainability, adequacy and effectiveness of the EHSP.

ZG will apply this strategy according to the Occupational Health & Safety Annual Review Procedure and will strive to eliminate or control identified hazards that may result in accidents, personal injury or illnesses, fires, security losses or other property damage.

SCOPE:

This policy applies to all ZG employees.

DEFINITIONS:

N/A

REFERENCES AND RELATED FORMS, POLICIES AND PROCEDURES:

Corresponding Procedure: EHS.30.02.101 Environmental Health & Safety Program Administration R.S.O. 1990, CHAPTER O.1 Occupational Health & Safety Act Regulation 213/91 Construction Projects Regulation 851 Industrial Establishments

Policy owner and for inquiries: Health & Safety Lead

Approved by: ZL President: Approved by: President/COO Zehr Group of Companies: Dates Revised:

Dates Revised: Dates Reviewed: January 23, 2023



CATEGORY:	Environmental Health & Safety	NUMBER:	EHS.30.01.102
SUBJECT:	Duties of Workplace Parties	EFFECTIVE:	August 1, 2021
REPLACES:	N/A	PAGE(S):	1 of 2

POLICY:

Zehr Group (ZG) is committed to providing a safe and health workplace for all employees and visitors. ZG recognizes all workplace parties play a vital role in employee/workplace safety. ZG is committed to fulfilling its duties under the Occupational Health & Safety Act (OHSA) and to the principles of the Internal Responsibility System (IRS).

SCOPE:

This policy applies to all ZG employees.

DEFINITIONS:

Internal Responsibility System (IRS) - Everyone in the workplace has a role to play in keeping workplaces safe and healthy. Workers in the workplace who see a health and safety problem such as a hazard or contravention of the OHSA in the workplace must report the situation to the employer or a supervisor. Employers and supervisors are, in turn, required to address those situations and acquaint workers with any hazard in the work that they do.

Worker -

- A person who performs work or supplies services for monetary compensation.
- A secondary school student who performs work or supplies services for no monetary compensation under a work experience program authorized by the school board that operates the school in which the student is enrolled.
- A person who performs work or supplies services for no monetary compensation under a program approved by a college of applied arts and technology, university, private career college or other post-secondary institution.

REFERENCES AND RELATED FORMS, POLICIES AND PROCEDURES:

Corresponding Procedure: EHS.30.02.102 Duties of Workplace Parties EHS.30.02.106 Work Refusal EHS.30.02.108 Illness/Injury Reporting R.S.O. 1990, CHAPTER O.1 Occupational Health & Safety Act

Policy owner and for inquiries: Health & Safety Lead

Approved by: ZL President: Signed document on file Approved by: President/COO Zehr Group of Companies: Signed document on file Dates Revised:



CATEGORY:	Environmental Health & Safety	NUMBER:	EHS.30.01.103
SUBJECT:	Joint Health & Safety Committee	EFFECTIVE:	August 1, 2021
REPLACES:	N/A	PAGE(S):	1 of 1

POLICY:

Zehr Group (ZG) is committed to providing a safe and health workplace for all employees and visitors to. The Ontario Occupational Health and Safety Act (OHSA) is based on the principle of the "internal responsibility system", whereby every individual in the workplace has responsibilities for health and safety. ZG will maintain a Joint Health & Safety Committee (JHSC) complaint with the OHSA and aligned with the philosophy of the internal responsibility system.

SCOPE:

This policy applies to all ZG employees.

DEFINITIONS:

Certified Member - A committee member who is certified by having received the prescribed training in accordance with OHSA.

Employer - A person who employs one or more workers or contracts the services of one or more worker.

Worker - A person who performs work or supplies services for monetary compensation.

Workplace Inspection - A systematic appraisal of the workplace and all applicable work practices.

REFERENCES AND RELATED FORMS, POLICIES AND PROCEDURES:

Corresponding Procedure: EHS.30.02.103 *Joint Health & Safety Committee* EHS.30.03.103 *JHSC Recommendation to Management Form* R.S.O. 1990, CHAPTER O.1 *Occupational Health & Safety Act*

Policy owner and for inquiries: Health & Safety Lead

Approved by: ZL President: Signed document on file Approved by: President/COO Zehr Group of Companies: Signed document on file Dates Revised:



CATEGORY:	Environmental Health & Safety	NUMBER:	EHS.30.01.104
SUBJECT:	Employee Safety Orientation	EFFECTIVE:	August 1, 2021
REPLACES:	N/A	PAGE(S):	1 of 1

POLICY:

Zehr Group (ZG) is committed to providing a safe and health workplace for all employees and visitors to. New or transferred employees unfamiliar with the duties of a job and its related risks, is at greater risk of injury or illness. ZG will provide a safety orientation appropriate to the role of the employee in an effort to prevent workplace related harm.

SCOPE:

This policy applies to all newly hired employees and to any employees (including temporary positions) who are assigned new or unfamiliar work and/or equipment. Certain provisions may also apply to students, and contract employees.

DEFINITIONS:

Health and Safety Orientation - means acquainting employees to ZG's health and safety program and the hazards to which they may be exposed, and familiarizing those individuals with the ZG's expectations regarding occupational health and safety and the roles and responsibilities of the workplace parties within the health and safety program

Job-Specific Health and Safety Training - means a formalized training program geared to a specific job/task (e.g. confined space entry) that provides participants with the necessary knowledge and skills to perform the job/task safely.

Workplace - Any land, premises, location or thing at, upon, in or near which a worker works.

REFERENCES AND RELATED FORMS, POLICIES AND PROCEDURES:

Corresponding Procedure: EHS.30.02.104 *Employee Safety Orientation* EHS.30.03.104 *Employee Safety Orientation Checklist* R.S.O. 1990, CHAPTER O.1 *Occupational Health & Safety Act* Regulation 213/91 *Construction Projects* Regulation 851 *Industrial Establishments*

Policy owner and for inquiries: Health & Safety Lead

Approved by: ZL President: Signed document on file		
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Approved by: President/COO Zehr Group of Compar	nies: Signed document on file	Hendel
Dates Revised:		\sim



CATEGORY:	Environmental Health & Safety	NUMBER:	EHS.30.01.105
SUBJECT:	Emergency Preparedness	EFFECTIVE:	August 1, 2021
REPLACES:	N/A	PAGE(S):	1 of 1

POLICY:

Zehr Group believes that Emergency Preparedness is essential in reducing the impact of emergencies in the workplace. Emergency Preparedness allows Employees to act quickly in response to emergencies and avoid critical outcomes.

It is expected that all ZG personnel be familiar with the emergency response plan specific to their job site or workplace through Site Specific Safety Orientation before any work begins. The emergency response plan should be available at all times on the Safety Bulletin Board. This plan should provide Workers with, but not limited to,the following: emergency contact phone numbers, and the location of emergency response equipment (first aid kit, spill kit, fire extinguisher, etc.)

In addition to developing emergency response plans, Managers and Supervisors are required to conductemergency response drills to evaluate the effectiveness of the plan and determine if there are deficiencies. Emergency response drills should be conducted at least annually. Following the completion of a drill, corrective actions will be addressed and resolved. Workers are expected to actively participate in Emergency Response drills.

This Emergency Preparedness Policy and the corresponding Procedure will be reviewed annually.

SCOPE:

This policy applies to all ZG employees.

DEFINITIONS:

N/A

REFERENCES AND RELATED FORMS, POLICIES AND PROCEDURES:

Corresponding Procedure: EHS.30.02.105 Emergency Preparedness EHS.30.01.131 Workplace Violence R.S.O. 1990, CHAPTER O.1 Occupational Health & Safety Act Regulation 213/91 Construction Projects Regulation 851 Industrial Establishments

Policy owner and for inquiries: Health & Safety Lead

Approved by: ZL President: Signed document on file _

Approved by: President/COO Zehr Group of Companies: Signed document on file

Dates Revised: Dates Reviewed: January 23, 2023



CATEGORY:	Environmental Health & Safety	NUMBER:	EHS.30.01.106
SUBJECT:	Right to Refuse Unsafe Work	EFFECTIVE:	August 1, 2021
REPLACES:	N/A	PAGE(S):	1 of 1

POLICY:

Zehr Group (ZG) is committed to ensuring a safe work environment for all employees and contractors. ZG will provide information and instruction to ensure that workers can safety perform their required duties. Workplace parties should use the internal responsibility system to control substandard and unsafe conditions through health and safety hazard reporting; hazard identification and assessment; hazard inspections, investigations and implementation of correction actions.

Workers do have the right to refuse work where they <u>believe</u> worker health and safety is in danger as outlined in the OHSA. It is the policy of ZG that all work refusals that are permitted under the OHSA be conducted in compliance with the OHSA and ZG's procedure.

A worker may refuse to work or 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 himself or herself;
- workplace violence is likely to endanger himself 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 this Act or the regulations and such contravention is likely to endanger himself, herself or another worker.

SCOPE:

This policy applies to all ZG employees and contractors.

REFERENCES AND RELATED FORMS, POLICIES AND PROCEDURES:

Corresponding Procedure: EHS.30.02.106 *Right to Refuse Unsafe Work* EHS.30.03.106 *Right to Refuse Unsafe Work Form* R.S.O. 1990, CHAPTER O.1 Occupational Health & Safety Act

Policy owner and for inquiries: Health & Safety Lead

Approved by: ZL President:	Signed document on file	John W	
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Approved by: President/COO	Zehr Group of Com	panies: Signed document on file	- Acout
Dates Revised:			\sim



CATEGORY:	Environmental Health & Safety	NUMBER:	EHS.30.01.107
SUBJECT:	Health & Safety Training	EFFECTIVE:	August 1, 2021
REPLACES:	N/A	PAGE(S):	1 of 2

POLICY:

Zehr Group (ZG) is committed to ensuring that all management and workers receive health and safety training required for their job position. Workers also include student workers, supplied labour and contract workers. Training will be provided to newly hired workers and management, those that have transferred internally from one job to another and also those who have been promoted from workers to management. ZG will also provide ongoing health and safety training for workers and management. A training needs assessment will be conducted by management in consultation with the joint health and safety committee (JHSC) to ensure the appropriate training is identified and delivered to workplace parties. All training content and training will be documented and maintained.

This policy will be evaluated annually by senior management in consultation with the JHSC. Upon consideration of recommendations, quality improvements will be implemented as required.

SCOPE:

This policy applies to all ZG employees.

DEFINITIONS:

Training - Refers to education and skills programs approved by ZG and given in a training course format in classroom, onsite or offsite or on line by a competent person(s) e.g. qualified trainers or supervisors or training providers or experts in a specific field.

REFERENCES AND RELATED FORMS, POLICIES AND PROCEDURES:

Corresponding Procedure: EHS.30.02.107 *Health & Safety Training* R.S.O. 1990, CHAPTER O.1 *Occupational Health & Safety Act* Regulation 213/91 *Construction Projects* Regulation 851 *Industrial Establishments*

Approved by: President: Zehr Levesque Signed document on file	
Approved by: President/COO Zehr Group of Companies: Signed document on file	
Dates Revised:	
Dates Reviewed: January 23, 2023	



CATEGORY:	Environmental Health & Safety	NUMBER:	EHS.30.01.108
SUBJECT:	Injury/Illness Reporting	EFFECTIVE:	August 1, 2021
REPLACES:	N/A	PAGE(S):	1 of 2

POLICY:

Zehr Group (ZG) is committed to providing a safe and health workplace for all employees and visitors. In the unfortunate event that an Injury or Illness occurs it must be reported immediately to a supervisor/manager. If the worker is unable to report due to the nature of injury/illness, then another employee who assists the injured worker must report immediately.

SCOPE:

This policy applies to all ZG employees.

DEFINITIONS:

Critical Injury - 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 or arm, but not a finger or toe;
- involves the amputation of a leg, arm, hand or foot but not a finger or toe;
- consists of burns to a major portion of the body; or causes the loss of sight in one eye

Fatality - An injury causing death.

Health Care Injuries - An injury that requires onsite medical evaluation/care from a Medical Professional.

Injury - First Aid Injuries: An injury that requires onsite first aider.

Lost time Injuries - An injury that requires lost time from work beyond the day of the injury, for employees.

Occupational Illness - An incident involving an exposure to an employee of a chemical or biological substance or an exposure to noise, through the course of employment, which causes an occupational illness.

REFERENCES AND RELATED FORMS, POLICIES AND PROCEDURES:

Corresponding Procedure: EHS.30.02.108 *Injury/Illness Reporting* R.S.O. 1990, CHAPTER O.1 *Occupational Health & Safety Act* Regulation 213/91 *Construction Projects* Regulation 851 *Industrial Establishments*

Policy owner and for inquiries: Health & Safety Lead

Approved by: President: Zehr Levesque Signed document on file A × 10. Approved by: President/COO Zehr Group of Companies: Signed document on file Dates Revised:



CATEGORY:	Environmental Health & Safety	NUMBER:	EHS.30.01.109
SUBJECT:	Early Safe Return to Work Program	EFFECTIVE:	August 1, 2021
REPLACES:	N/A	PAGE(S):	1 of 2

POLICY:

Zehr Group (ZG) is committed to providing an Early and Safe Return to Work (ESRTW) Program to all of its employees following work-related injury. ZG recognizes that the provision of suitable alternate or modified work is important in the proper recovery of the injured employees who are unable to perform their normal duties as a consequence of an injury or illness. An effective ESRTW Program encourages and promotes early intervention, rehabilitation and recovery, while allowing ZG to meet its moral and legal obligation, to accommodate injured or ill employees.

ZG will work in collaboration with the injured employee and their medical doctor to expend a serious effort in identifying suitable modified work that is both productive and safe. The return to work process begins immediately after an injury/illness occurs. ZG will strive to provide the necessary resources to facilitate a safe and early return to work. Any personal medical information will be kept confidential.

Suitable modified duties will be provided for all employees returning to work after extended periods of absence, or for employees with disabilities that would require them to remain off work for longer periods, if modified duties were not available. Every reasonable effort will be made to accommodate the individual restrictions and limitations of each employee during their rehabilitation and recovery period.

SCOPE:

This policy applies to all ZG employees.

DEFINITIONS:

N/A

REFERENCES AND RELATED FORMS, POLICIES AND PROCEDURES:

Corresponding Procedure: EHS.30.02.109 Early Safe Return to Work Program Workplace Safety & Insurance Act

Policy owner and for inquiries: Health & Safety Lead
Approved by: President: Zehr Levesque Signed document on file
Approved by: President/COO Zehr Group of Companies: Signed document on file
Dates Revised:
Dates Reviewed: January 23, 2023



CATEGORY:	Environmental Health & Safety	NUMBER:	EHS.30.01.110
SUBJECT:	First Aid Kits	EFFECTIVE:	August 1, 2021
REPLACES:	N/A	PAGE(S):	1 of 2

POLICY:

Zehr Group (ZG) is committed to providing a safe and health workplace for all employees and visitors. A program element to assist with the achievement of this is the compliance to Regulation 1101 under the Workplace Safety and Insurance Act. ZG commits to providing first aid materials and appropriately trained staff to meet or exceed this regulation.

SCOPE:

This policy applies to all ZG employees.

DEFINITIONS:

First Aid* - First aid is 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.

*Workplace Safety & Insurance Board (WSIB). (05-Jan-2010). Employers' Initial Accident - Reporting Obligations.

First Aider - A person holding a valid First Aid Certificate issued by a training agency recognized by the Workplace Safety & Insurance Board (WSIB).

First Aid Station - The conspicuous location of a first aid box and the postings required by Regulation 1101 in the workplace.

REFERENCES AND RELATED FORMS, POLICIES AND PROCEDURES:

Corresponding Procedure: EHS.30.02.110 *First Aid Kits* Regulation 1101 of the Workplace Safety and Insurance Act

Policy owner and for inquiries: Health & Safety Lead
Approved by: President: Zehr Levesque Signed document on file
Approved by: President/COO Zehr Group of Companies: Signed document on file
Dates Revised:
Dates Reviewed: January 23, 2023



CATEGORY:	Environmental Health & Safety	NUMBER:	EHS.30.01.111
SUBJECT:	Accident/Incident Investigation	EFFECTIVE:	August 1, 2021
REPLACES:	N/A	PAGE(S):	1 of 2

POLICY:

Zehr Group (ZG) is committed to providing a safe and health workplace for all employees, contractors and visitors. ZG requires that all workers (including contractors) report accidents, exposures, injuries, and near misses to their supervisor as soon as possible after the occurrence. Reporting of these incidents provides opportunities to improve the performance of safety programs, the quality of the working environment and the safety of staff, contractors and visitors, and to ensure compliance with the Occupational Health & Safety Act and the Workplace Safety & Insurance Act.

The principles of this policy are consistent with ZG's values of safety, compassion, teamwork, integrity and stewardship. When an injury occurs in the workplace, the first priority is to ensure prompt medical treatment for the injured worker and to ensure that any risk to other persons from any device, equipment or physical condition of the workplace has been corrected.

SCOPE:

This policy applies to all ZG employees and contractors.

DEFINITIONS:

Critical Injury - 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 or arm, but not a finger or toe;
- involves the amputation of a leg, arm, hand or foot but not a finger or toe;
- consists of burns to a major portion of the body; or causes the loss of sight in one eye
- Fatality: An injury causing death.

Environmental Releases - An incident that results in a release of hazardous materials, hazardous waste or sewage to the environment.

Fire - An incident that causing a fire on ZG property or project site.

Health Care Injuries - An injury that requires onsite medical evaluation/care from a Medical Professional.

Incident - An event that occurs involving an employee, student or member of the public that results in or could result in injury or financial loss or damage to ZG property as defined below.

Injury - First Aid Injuries: An injury that requires onsite first aider.

Lost time Injuries - An injury that requires lost time from work beyond the day of the injury, for employees.

Near Miss - An incident or occurrence that did not cause injury but had the potential to cause harm.

Occupational Illness - An incident involving an exposure to an employee of a chemical or biological substance or an exposure to noise, through the course of employment, which causes an occupational illness.

Property Damage - An incident that results in damage to ZG property or project site.

REFERENCES AND RELATED FORMS, POLICIES AND PROCEDURES:

Corresponding Procedure: EHS.30.02.111 Accident/Incident Investigation EHS.30.03.111 Accident/Incident Accident Investigation Form EHS.30.04.111 Accident Investigation Employee Statement Form EHS.30.05.111 Accident Investigation Witness Statement Form R.S.O. 1990, CHAPTER O.1 Occupational Health & Safety Act Regulation 213/91 Construction Projects Regulation 851 Industrial Establishments

Approved by: President: Zehr Levesque Signed document on file Approved by: President/COO Zehr Group of Companies: Signed document on file Dates Revised: Dates Reviewed: January 23, 2023



CATEGORY:	Environmental Health & Safety	NUMBER:	EHS.30.01.112
SUBJECT:	Hazard Assessment & Control	EFFECTIVE:	August 1, 2021
REPLACES:	N/A	PAGE(S):	1 of 2

POLICY:

Zehr Group (ZG) is committed to providing a safe and health workplace for all employees and visitors, Hazard Assessment & Control processes help keep the workplace safe by identifying health and safety hazards enabling ZG to implement corrective measures prior to incident or injury.

SCOPE:

This policy applies to all ZG employees.

DEFINITIONS:

Competent Person - A person, who is qualified because of knowledge, training, experience to organize the work and its performance, is familiar with the Act and the regulations that apply, and has knowledge of any potential or actual danger to the health or safety in the workplace.

Control - A means of limiting or regulating something, specifically limiting the risk involved in a hazard.

Critical Task - A task that, if not completed will result in the required work not being completed. Must be accomplished following the specified Safe Work Practices or Safe Job Procedures, or may result in a serious adverse effect.

Hazard - Any real or potential condition, practice, behavior, act or thing that can be a source of potential harm to a worker or damage to or loss of equipment, property or the environment.

Hazard Assessment - The process of conducting a systematic review in order to identify hazards associated with work activities, analyze or evaluate the risks associated with the hazards, and to determine appropriate ways to eliminate or control the hazards.

Pre-Job Safety Instruction (PSI) - focuses on job tasks as a way to identify hazards before they occur, and identify controls that will be used to mitigate the risks. It focuses on the relationship between the Worker, the task, the tool and the work environment.

Risk - The chance of injury or loss as measured by a combination of the likelihood of the occurrence and the severity of an adverse effect to health, property, the environment or other things of value as a result of the occurrence.

REFERENCES AND RELATED FORMS, POLICIES AND PROCEDURES:

Corresponding Procedure: EHS.30.02.112 Hazard Assessment & Control Hazard Assessment Recording Form R.S.O. 1990, CHAPTER O.1 Occupational Health & Safety Act Regulation 213/91 Construction Projects Regulation 851 Industrial Establishments

1 Approved by: President: Zehr Levesque Signed document on file Approved by: President/COO Zehr Group of Companies: Signed document on file Dates Revised: Dates Reviewed: January 23, 2023



CATEGORY:	Environmental Health & Safety	NUMBER:	EHS.30.01.113
SUBJECT:	Workplace Inspection	EFFECTIVE:	August 1, 2021
REPLACES:	N/A	PAGE(S):	1 of 1

POLICY:

Zehr Group (ZG) is committed to providing a safe and health workplace for all employees and visitors to. Workplace Inspections help keep the workplace safe by identifying health and safety hazards, equipment maintenance issues, checking on previous issues noted on past inspections, hazard control effectiveness, training needs and housekeeping issues.

SCOPE:

This policy applies to all ZG employees.

DEFINITIONS:

Hazard - Any real or potential condition, practice, behavior, act or thing that can be a source of potential harm to a worker or damage to or loss of equipment, property or the environment.

Risk - The chance of injury or loss as measured by a combination of the likelihood of the occurrence and the severity of an adverse effect to health, property, the environment or other things of value as a result of the occurrence.

Workplace - Any land, premises, location or thing at, upon, in or near which a worker works.

Workplace Inspection - A systematic appraisal of the workplace and all applicable work practices.

REFERENCES AND RELATED FORMS, POLICIES AND PROCEDURES:

Corresponding Procedure: EHS.30.02.113 Workplace Inspection Workplace Inspection Recording Form R.S.O. 1990, CHAPTER O.1 Occupational Health & Safety Act Regulation 213/91 Construction Projects Regulation 851 Industrial Establishments

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Approved by: President/COO Zehr Group of Companies: Sign	ed document on file
Dates Revised:	
Dates Reviewed: January 23, 2023	



CATEGORY:	Environmental Health & Safety	NUMBER:	EHS.30.01.114
SUBJECT:	Workplace Hazardous Materials Information System	EFFECTIVE:	August 1, 2021
	(WHMIS)		
REPLACES:	N/A	PAGE(S):	1 of 1

POLICY:

Zehr Group (ZG) is committed to providing a safe working environment for their employees. This policy is in accordance with Ont. Reg. 860 – Workplace Hazardous Materials Information System (WHMIS). ZG will strive to exceed the standards of the WHMIS Regulation 860 and will control hazardous products to protect the employees and protect the environment.

The Safety Data Sheet (SDS) for each product will be accessible through MSDS online and is accessible to everyone on site at any time.

SCOPE:

This policy applies to all ZG employees.

All ZG employees shall be trained in the Workplace Hazardous Materials Information System (WHMIS) before commencing work. Re-training shall be provided by supervisors as often as necessary to maintain awareness of WHMIS requirements, at minimum retraining every 2 years is required. All Supervisors must ensure that all employees that they supervise have current WHMIS training.

REFERENCES AND RELATED FORMS, POLICIES AND PROCEDURES:

Corresponding Procedure: EHS.30.02.114 Workplace Hazardous Materials Information System (WHMIS) R.S.O. 1990, CHAPTER O.1 Occupational Health & Safety Act Regulation 297/13 Occupational Health and Safety Awareness Training Ont. Reg. 860 – Workplace Hazardous Materials Information System (WHMIS)

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Dates Reviewed: January 23, 2023	



CATEGORY:	Environmental Health & Safety	NUMBER:	EHS.30.01.115
SUBJECT:	Personal Protective Equipment	EFFECTIVE:	August 1, 2021
REPLACES:	N/A	PAGE(S):	1 of 1

POLICY:

The purpose of the Personal Protective Equipment Policies is to protect the employees of Zehr Group (ZG) from exposure to work place hazards and the risk of injury through the use of personal protective equipment (PPE). PPE is not a substitute for more effective control methods and its use will be considered only when other means of protection against hazards are not adequate or feasible. It will be used in conjunction with other controls unless no other means of hazard control exist.

Personal protective equipment will be provided, used, and maintained when it has been determined that its use is required to ensure the safety and health of our employees and that such use will lessen the likelihood of occupational injury and/or illness.

SCOPE:

This policy applies to all ZG employees.

DEFINITIONS:

N/A

REFERENCES AND RELATED FORMS, POLICIES AND PROCEDURES:

Corresponding Procedure: EHS.30.02.115 Personal Protective Equipment R.S.O. 1990, CHAPTER O.1 Occupational Health & Safety Act Regulation 213/91 Construction Projects Regulation 851 Industrial Establishments

Approved by: President: Zehr Levesque Signed document on file Approved by: President/COO Zehr Group of Companies: Signed document on file Dates Revised: Dates Reviewed: January 23, 2023



CATEGORY:	Environmental Health & Safety	NUMBER:	EHS.30.01.116
SUBJECT:	Housekeeping	EFFECTIVE:	August 1, 2021
REPLACES:	N/A	PAGE(S):	1 of 1

POLICY:

Zehr Group (ZG) is committed to providing a safe and healthy workplace for all employees and visitors. Housekeeping involves every phase of operations and applies to all aspects of ZG operations, indoors and out. The identification and elimination of inefficiencies and hazards caused by sub-optimal conditions in and about the workplace is essential in getting the job done efficiently and safely.

SCOPE:

This policy applies to all ZG employees.

DEFINITIONS:

Hazard - Any real or potential condition, practice, behavior, act or thing that can be a source of potential harm to a worker or damage to or loss of equipment, property or the environment.

Risk - The chance of injury or loss as measured by a combination of the likelihood of the occurrence and the severity of an adverse effect to health, property, the environment or other things of value as a result of the occurrence.

Workplace - Any land, premises, location or thing at, upon, in or near which a worker works.

REFERENCES AND RELATED FORMS, POLICIES AND PROCEDURES:

Corresponding Procedure: EHS.30.02.116 Housekeeping R.S.O. 1990, CHAPTER O.1 Occupational Health & Safety Act

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CATEGORY:	Environmental Health & Safety	NUMBER:	EHS.30.01.117
SUBJECT:	Working Alone	EFFECTIVE:	August 1, 2021
REPLACES:	N/A	PAGE(S):	1 of 2

POLICY:

Zehr Group (ZG) is committed to providing a safe work environment for its employees. ZG will take all reasonable and practical measures to eliminate or minimize injury or incident risks associated with the nature of the work performed when employees work alone. The intent of this policy is to protect workers who are working alone and to enable them to summon immediate assistance in the event of an emergency.

SCOPE:

This policy applies to all ZG employees.

DEFINITIONS:

Buddy System- means a plan of organizing and designating employees such that each employee is observed by at least one other. The Buddy System must include periodic checking of the other's designated safety.

Competent Person- is defined by the OHSA, and any amendments thereto, and means a Supervisor who is:

- a. qualified because of knowledge, training and experience to organize the work and its performance
- b. is familiar with the OHSA and the regulations that apply to the work, and
- c. has knowledge of any potential or actual danger to health or safety in the workplace

Employee- means a worker, as defined under the OHSA, who is employed at the ZG.

Hazard- means a situation in the Workplace that poses a level of threat to life, health, property or the environment.

Risk Level- means the classification given to a Hazard (LOW, Moderate, High).

Safety Plan- means a documented plan of safe work procedures to prevent or minimize the occurrence of Workplace accidents.

Supervisor- means any person who has supervisory responsibilities over other person(s) or has charge of the Workplace

Visitor- means any person who is not a ZG employee and who has occasion, for any reason, to be present at any location owned, leased, rented or otherwise utilized by ZG.

Workplace- means any location or facility owned, leased, rented or otherwise utilized by ZG for the purposes of carrying out ZG business, including any off-site location where authorized work is being conducted.

Working Alone- means any work, taking place in a location where, in the event of injury, health impairment, victimization or other foreseeable serious emergency, immediate assistance would not be available to a ZG employee.

REFERENCES AND RELATED FORMS, POLICIES AND PROCEDURES:

Corresponding Procedure: EHS.30.02.117 Working Alone R.S.O. 1990, CHAPTER O.1 Occupational Health & Safety Act

Policy owner and for inquiries: Health & Safety Lead

N Approved by: President: Zehr Levesque Signed document on file Approved by: President/COO Zehr Group of Companies: Signed document on file Dates Revised:



CATEGORY:	Environmental Health & Safety	NUMBER:	EHS.30.01.118
SUBJECT:	Musculoskeletal Disorder Prevention	EFFECTIVE:	August 1, 2021
REPLACES:	N/A	PAGE(S):	1 of 2

POLICY:

Zehr Group (ZG) is committed to providing a safe and healthy working environment for all employees. In recognition that musculoskeletal disorders (MSD's) continue to be a significant cause of work related injuries, ZG is committed to minimizing the risk and incidence of MSDs by taking every precaution reasonable in the circumstances to protect employees. ZG is committed to providing financial, physical and human resources for the development, implementation and maintenance of a sustainable MSD prevention program that will ensure MSD risk factors are identified and effectively controlled.

SCOPE:

This policy applies to all ZG employees.

DEFINITIONS:

Awkward Posture - Any fixed or constrained body position that overloads muscles, tendons, or joints. Generally, the more a joint deviates from the neutral position the more the posture is considered to be 'awkward' and the greater the risk of injury.

Neutral Posture - are those in which the muscles, tendons, and joints function optimally and require the least amount of effort to maintain.

Static Posture - a body position that requires sustained physical effort, without joint movement.

Force - Force is generated through muscular effort during lifting, pushing, pulling, and carrying tasks. When doing 'work' the body uses muscles to generate this force to allow for movements of the body.

Repetition - A task that uses the same muscles repeatedly. Repetition may be measures in terms of minutes, hours or work day (e.g. 3 per minute, 25 per hour, 30 times per shift). The level of risk depends on frequency of repetition, time for rest/recovery, speed of motion, postures required and amount of force required.

Physical Demands Descriptions (PDD) - a process to document the overall various physical attributes of a job. A well-documented PDD identifies force, posture, repetition, and duration of tasks.

Ergonomics - "Ergonomics is the science of fitting the task to the worker by balancing the job demands with the capabilities of the human. "The profession applies theory, principles, data, methods, and analysis to design in order to optimize human well-being and overall system performance". (Association of Canadian Ergonomists, 2006)

REFERENCES AND RELATED FORMS, POLICIES AND PROCEDURES:

Corresponding Procedure: EHS.30.02.118 *Musculoskeletal Disorder Prevention* R.S.O. 1990, CHAPTER O.1 *Occupational Health & Safety Act* Regulation 213/91 *Construction Projects* Regulation 851 Industrial Establishments

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CATEGORY:	Environmental Health & Safety	NUMBER:	EHS.30.01.119
SUBJECT:	Ladder Safety	EFFECTIVE:	August 1, 2021
REPLACES:	N/A	PAGE(S):	1 of 1

POLICY:

Zehr Group (ZG) is committed to ensuring a safe work environment for all employees, contractors, and visitors. ZG will provide information and instruction to ensure that workers properly use the required equipment.

ZG has developed safe operating procedures to be followed when using a ladder and for the storage of a ladder. All employees whose duties require them to use a ladder are required to follow the procedures as outlined to reduce or eliminate hazards and to ensure safe work practices related to the use of ladders.

SCOPE:

This policy applies to all ZG employees and contractors.

Legislation

Regulation for the Industrial Establishments (Reg. 851) made under the Occupation Health and Safety Act f

Construction Regulation 213/91, sec 78-84. Consider the work being conducted. If it considered to be construction work, work must be performed in accordance to those regulations, even if the work is performed in a non-construction setting. Under Regulation 297/13 - Occupational Health and Safety Awareness Training, mandatory training must be provided for workers whose jobs require working at heights.

REFERENCES AND RELATED FORMS, POLICIES AND PROCEDURES:

Corresponding Procedure: EHS.30.02.119 Ladder Safety EHS.30.03.119 Ladder Safety Checklist R.S.O. 1990, CHAPTER O.1 Occupational Health & Safety Act Regulation 213/91 Construction Projects Regulation 297/13 Occupational Health and Safety Awareness Training

Policy owner and for inquiries: Health & Safety Lead

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CATEGORY:	Environmental Health & Safety	NUMBER:	EHS.30.01.120
SUBJECT:	Safe Driving	EFFECTIVE:	August 1, 2021
REPLACES:	N/A	PAGE(S):	1 of 2

POLICY:

Zehr Group (ZG) employees are required to drive during their course of employment. The main purpose of this policy is to protect the health and safety of ZG employees, by promoting safe driving habits and prohibiting or restricting them from undertaking activities that distract their focus from driving responsibilities while operating any motor vehicle in the course of their work.

This policy applies to all employees when **any** of the following five conditions apply:

- Operating a company vehicle
- Operating a personal vehicle on company business
- Driving on company property
- Using a cell phone supplied by the company.
- Using a personal phone for company business

Ontario's distracted driving laws apply to the use of hand-held communication/entertainment devices and certain display screens.

While you are driving, including when you are stopped in traffic or at a red light, it is illegal to:

- use a phone or other hand-held wireless communication device to text or dial you can only touch a device to call 911 in an emergency
- use a hand-held electronic entertainment device, such as a tablet or portable gaming console
- view display screens unrelated to driving, such as watching a video
- program a GPS device, except by voice commands

You are allowed to use hands-free wireless communications devices with an earpiece, lapel button or Bluetooth. You can view GPS display screens as long as they are built into your vehicle's dashboard or securely mounted on the dashboard.

Other actions such as eating, drinking, grooming, smoking, reading and reaching for objects are not part of Ontario's distracted driving law. However, you can still be charged with careless or dangerous driving.

SCOPE:

This policy applies to all ZG employees.

EHS.30.01.120 Page 2 of 2

REFERENCES AND RELATED FORMS, POLICIES AND PROCEDURES:

Corresponding Procedure: EHS.30.02.120 Safe Driving EHS.30.01.108 Injury/Illness Reporting EHS.30.04.111 Accident/Incident Employee Statement Form EHS.30.05.111 Accident/Incident Witness Statement Form R.S.O. 1990, CHAPTER O.1 Occupational Health & Safety Act Regulation 297/13 Occupational Health and Safety Awareness Training

Policy owner and for inquiries: Health & Safety Lead

Approved by: President: Zehr Levesque Signed document on file Approved by: President/COO Zehr Group of Companies: Signed document on file Dates Revised:



CATEGORY:	Environmental Health & Safety	NUMBER:	EHS.30.01.121
SUBJECT:	Mobile Device Use	EFFECTIVE:	August 1, 2021
REPLACES:	N/A	PAGE(S):	1 of 1

POLICY:

Zehr Group (ZG) is committed to providing a safe and healthy workplace for all workers under their direction. The use of mobile devices on site is prohibited unless expressed consent is granted by site management. Only those individuals authorized by site management are permitted to use mobile devices on worksites. The use of mobile devices is not permitted while operating any vehicle or equipment (including mobile material handling equipment), while working on any aerial work platforms, or while performing work activities. This includes talking, texting, emailing, playing games, etc.

The purpose of this policy is to provide clear directions to employees and management staff of ZG by providing a readily available reference document outlining the company's policy on mobile device use. The policy applies equally across the organization at all levels to ensure:

- a) The health and wellness of individuals, and
- b) The safety, health and welfare of colleagues, the public and the overall place of work.

The place of work may be considered as the company's registered premise, attributed worksites, equipment/machinery, company vehicles or travelling for work or at any time where the employee is being paid by the ZG.

In the context of this Policy, the term 'mobile device' includes any mobile phone or electronic device capable of remote communication, such as a cellular phone, smart phone, personal digital assistance (PDA) or portable tablet/iPad, etc.

SCOPE:

This policy applies to all ZG employees, visitors and contractors.

DEFINITIONS:

N/A

REFERENCES AND RELATED FORMS, POLICIES AND PROCEDURES:

Corresponding Procedure: EHS.30.02.121 Mobile Device Use R.S.O. 1990, CHAPTER O.1 Occupational Health & Safety Act Regulation 213/91 Construction Projects Regulation 851 Industrial Establishments

Policy owner and for inquiries: Health & Safety Lead
Approved by: President: Zehr Levesque:
Approved by: President/COO Zehr Group of Companies:
Dates Revised:



CATEGORY:	Environmental Health & Safety	NUMBER:	EHS.30.01.122
SUBJECT:	Confined Space Entry	EFFECTIVE:	August 1, 2021
REPLACES:	N/A	PAGE(S):	1 of 2

POLICY:

Zehr Group (ZG) recognizes the hazards associated with confined spaces in the workplace, this policy and procedure is intended to provide direction for the development of effective confined space programs to protect all employees who enter and perform work in confined spaces.

SCOPE:

This policy applies to all ZG employees, Subcontractors and Visitors.

DEFINITIONS:

Assessment - Means an assessment of the hazards with respect to one or more confined spaces in a workplace.

Atmospheric Hazards -

(a) the accumulation of flammable, combustible or explosive agents'

- (b) an oxygen content in the atmosphere that is less than 19.5 percent or more than 23 per cent by volume,
- (c) the accumulation of atmospheric contaminants, including gases, vapours, fumes, dust or mists, that could,
 - I. result if acute health effects that pose an immediate threat to life, or
 - II. interfere with a person's ability to escape unaided from a confined space.

Confined Space - a fully or partially enclosed space,

- That is not both designed and constructed for continuous human occupancy, AND
- In which atmospheric hazards may occur because of its construction, location or contents or because of work that is done in it.

Hot Work - Work that is capable of producing a source of ignition.

Permit - A written entry permit prepared by a competent person in advance of entering a specific confined space and that meets the requirements described in regulation. A "plan" may be incorporated into a permit.

Plan - A written plan (as described in regulation) for one or more confined spaces in a workplace.

Program - A written program (as described in regulation) for one or more confined spaces in a workplace.

REFERENCES AND RELATED FORMS, POLICIES AND PROCEDURES:

Corresponding Procedure: EHS.30.02.122 Confined Space R.S.O. 1990, CHAPTER O.1 Occupational Health & Safety Act Regulation 213/91 Construction Projects Regulation 851 Industrial Establishments

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CATEGORY:	Environmental Health & Safety	NUMBER:	EHS.30.01.122
SUBJECT:	Lockout/Tagout	EFFECTIVE:	August 1, 2021
REPLACES:	N/A	PAGE(S):	1 of 1

POLICY:

Zehr Group (ZG) recognizes the risk in working with and maintaining energized equipment. t To prevent injury to our workers, it is necessary that machinery and equipment must be deenergized, locked out to a zero energy state or to have other means of providing an adequate temporary protective device or process so that the equipment is safe to work on. ZG shall establish and implement written Lockout/Tagout procedures that set out the requirements for lockout/tagout during the servicing or maintenance of equipment, machinery, or pressure systems.

SCOPE:

This policy applies to all ZG employees, Subcontractors and Visitors.

DEFINITIONS:

Lockout - A combination of locks with keys to hold an energy-isolating device in a safe position to prevent energizing of the machine or equipment. Lockout devices include padlocks, restraining bars, and multiple lockout hasps.

Tagout - A system which utilizes durable warning signs that notifies workers not to operate equipment, machinery, or pressure systems until the signs are removed. Plastic tag(s) used to identify the authorized person who has applied the lockout/tagout along with the date and reason for the lockout is to be left in place for more than their shift.

Site Lock(s) - Lock(s) assigned to specific worksite for the application of the lockout/tagout policy and procedures.

REFERENCES AND RELATED FORMS, POLICIES AND PROCEDURES:

Corresponding Procedure: EHS.30.02.122 Lockout/Tagout R.S.O. 1990, CHAPTER O.1 Occupational Health & Safety Act Regulation 213/91 Construction Projects Regulation 851 Industrial Establishments

Policy owner and for inquiries: Health & Safety Lead	
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CATEGORY:	Environmental Health & Safety	NUMBER:	EHS.30.01.124
SUBJECT:	Heat/Cold Stress	EFFECTIVE:	August 1, 2021
REPLACES:	N/A	PAGE(S):	1 of 1

POLICY:

Zehr Group (ZG) recognizes that working in extreme temperatures (hot or cold) can overwhelm the body's internal temperature control system. The Heat/Cold Stress program is designed to ensure that ZG employees that are carrying out work in extreme heat or cold are able to carry out that work without risk to their health and safety, so far as is reasonably practicable.

SCOPE:

This policy applies to all ZG employees, Subcontractors, and Visitors.

DEFINITIONS:

N/A

REFERENCES AND RELATED FORMS, POLICIES AND PROCEDURES:

Corresponding Procedure: EHS.30.02.124 *Heat/Cold Stress* R.S.O. 1990, CHAPTER O.1 *Occupational Health & Safety Act*

Policy owner and for inquiries: Health & Safety Lead

Approved by: President: Zehr Levesque: Approved by: President/COO Zehr Group of Companies: Dates Revised: January 23, 2023

Dates Revised: January 23, 2 Dates Reviewed:



CATEGORY:	Environmental Health & Safety	NUMBER:	EHS.30.01.125
SUBJECT:	Working at Heights	EFFECTIVE:	August 1, 2021
REPLACES:	N/A	PAGE(S):	1 of 2

POLICY:

Zehr Group (ZG) is committed to the protection of employees from occupational injury or illness. Working at Heights (WAH) presents significant hazards, ZG shall comply with the Ministry of Labour (MOL) standards as outlined the training requirements for workers on construction projects.

SCOPE:

This policy applies to all ZG employees, Subcontractors and Visitors.

DEFINITIONS:

Anchorage - A secure connecting point capable of safely withstanding the impact forces (weight capacity) applied, as applicable, by a fall arrest, fall restricting or fall prevention system, or anchorage subsystem.

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

Construction - Includes erection, alteration, repair, dismantling, demolition, structural maintenance, painting, land clearing, earth moving, grading, excavating, trenching, digging, boring, drilling, blasting, or concreting, the installation of any machinery or plant, and any work or undertaking in connection with a project but does not include any work or undertaking underground in a mine.

Fall arrest system - An assembly of components joined together so that when the assembly is connected to a fixed support, it is capable of arresting a worker's fall.

Fall restricting system - A type of fall arrest system that has been designed to limit a worker's fall to a specified distance.

Fall prevention - A system that prevents or eliminates the hazard of a fall.

Fall protection - Equipment used to mitigate or limit the effects of a fall from a height. Fall protection does not stop the fall; it is equipment used by employees to limit the distance and effects of a fall when working in an area where a potential fall exists.

<u>NOTE</u>: Fall prevention and fall protection are two different systems to protect employees.

Fixed support - A permanent or temporary structure or a component of such a structure that can withstand all loads and forces the structure or component is intended to support or resist and is sufficient to protect a worker's health and safety, and includes equipment or devices that are securely fastened to the structure or component.

Full body harness - A device that can arrest an accidental vertical or near vertical fall of a worker and which can guide and distribute the impact forces of the fall by means of leg and shoulder strap supports and an upper dorsal suspension assembly which, after the arrest, will not by itself permit the release or further lowering of the worker.

Guardrail system - An assembly of components joined together to provide a barrier to prevent a worker from falling from the edge of a surface.

Safety belt - A belt worn around the waist of a worker and all the fittings for the belt appropriate for the use being made of it.

Safety net - A safety net that complies with section 26.8 of *Ontario Regulation 213/91* and is located and supported in such a way that it arrests the fall of a worker who may fall into it without endangering the worker.

Safety factor - means the ratio of the failure load to the specified load or rated load.

Suspension Trauma - A serious medical condition that can lead to unconsciousness, injury or death, which can occur when a worker is suspended in a harness for too long after a fall.

Travel restraint system - An assembly of components capable of restricting a worker's movement on a work surface and preventing the worker from reaching a location from which he or she could fall.

Work belt - A belt that has a back support pad and a connecting hook at the front and that is capable of supporting a worker.

REFERENCES AND RELATED FORMS, POLICIES AND PROCEDURES:

Corresponding Procedure: EHS.30.02.125 Working at Heights R.S.O. 1990, CHAPTER O.1 Occupational Health & Safety Act Regulation 213/91 Construction Projects Regulation 851 Industrial Establishments

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CATEGORY:	Environmental Health & Safety	NUMBER:	EHS.30.01.126
SUBJECT:	Powered Mobile Equipment	EFFECTIVE:	August 1, 2021
REPLACES:	N/A	PAGE(S):	1 of 1

POLICY:

Operations at Zehr Group (ZG) work sites that require workers to operate powered mobile equipment expose workers to health and safety hazards. Management recognizes these hazards and is committed to ensure that they are properly identified, assessed, and controlled.

ZG has developed and implemented this policy ensure that power mobile equipment operators are fully trained and qualified to safely operate mobile equipment to reduce the possibility of personal injury or property damage in accordance with Ontario Occupational Health and Safety Act and Regulation.

SCOPE:

This policy applies to all ZG employees, Subcontractors, and Visitors

DEFINITIONS:

N/A

REFERENCES AND RELATED FORMS, POLICIES AND PROCEDURES:

Corresponding Procedure: EHS.30.02.126 Powered Mobile Equipment R.S.O. 1990, CHAPTER O.1 Occupational Health & Safety Act Regulation 213/91 Construction Projects Regulation 851 Industrial Establishments

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CATEGORY:	Environmental Health & Safety	NUMBER:	EHS.30.01.127
SUBJECT:	Welding, Cutting, Hot Work	EFFECTIVE:	August 1, 2021
REPLACES:	N/A	PAGE(S):	1 of 1

POLICY:

Zehr Group (ZG) is committed to provide a place of employment that is free from recognized hazards that cause or are likely to cause death or serious physical harm to employees. Welding operations will be performed only by authorized and trained employees. When welding hazards exist that cannot be eliminated, then engineering practices, administrative practices, safe work practices, Personal Protective Equipment (PPE), and proper training regarding Welding will be implemented. These measures will be implemented to minimize those hazards to ensure the safety of employees and the public.

SCOPE:

This policy applies to all ZG employees, Subcontractors, and Visitors

DEFINITIONS:

Confined Space – A fully or partially enclosed space, that is not both designed and constructed for continuous human occupancy, and in which atmospheric hazards may occur because of its construction, location or contents or because of work that is done in it.

Hazardous - Any act, condition, or substance which poses health and safety risks to employees.

Hot Work Permit - A permit allowing employees to perform work involving welding, cutting, or any task that would deplete oxygen, create toxic fumes and vapors, or create the potential for fire or explosion.

Pulmonary - Any body function related to the lungs.

Welder/Welding Operator – Any operator of electric or gas welding and cutting equipment.

REFERENCES AND RELATED FORMS, POLICIES AND PROCEDURES:

Corresponding Procedure: EHS.30.02.127 Welding, Cutting, Hot Work R.S.O. 1990, CHAPTER O.1 Occupational Health & Safety Act Regulation 213/91 Construction Projects Regulation 851 Industrial Establishments

Policy owner and for inquiries: Health & Safety Lead
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CATEGORY:	Environmental Health & Safety	NUMBER:	EHS.30.01.128
SUBJECT:	Fire Protection	EFFECTIVE:	August 1, 2021
REPLACES:	N/A	PAGE(S):	1 of 2

POLICY:

Zehr Group (ZG) recognizes workplace fire protection as an integral element to the safety of its employees and visitors to its sites. Fire Safety Plans shall be established for all ZG buildings/jobsites and shall be produced for the local Chief Fire Official upon request.

SCOPE:

This policy applies to all ZG employees, Subcontractors, and Visitors.

DEFINITIONS:

Building - Any structure used or intended for supporting or sheltering any use or occupancy.

Check - Visual observation to ensure the device or system is in place and is not obviously damaged or obstructed.

Class A Fire - A fire involving combustible materials such as wood, cloth and paper.

Class B Fire - A fire involving a flammable or a combustible liquid, fat or grease.

Class C Fire - A fire involving energized electrical equipment.

Class D Fire - A fire involving a combustible metal.

Exit - that part of a means of egress, including doorways, that leads from the floor area it serves to a separate building, an open public thoroughfare or an exterior open space protected from fire exposure from the building and having access to an open public thoroughfare.

Fire compartment - an enclosed space in a building that is separated from all other parts of the building by enclosing construction that provides a fire separation having a required fire-resistance rating.

Inspection – A physical examination to determine that the device or system will apparently perform in accordance with its intended function.

Means of egress - A continuous path of travel provided for the escape of persons from any point in a building or contained open space to a separate building, an open public thoroughfare or an exterior open space protected from fire exposure from the building and having access to an open public thoroughfare. Means of egress includes both exits and access to exits.

Occupancy - The use or intended use of a building or part thereof for the shelter or support of persons or property.

Occupant load - The number of persons for which a building or part thereof is designed.

Test - The operation of a device or system to ensure that it will perform in accordance with its intended operation or function.

REFERENCES AND RELATED FORMS, POLICIES AND PROCEDURES:

Corresponding Procedure: EHS.30.02.128 *Fire Protection* R.S.O. 1990, CHAPTER O.1 *Occupational Health & Safety Act* O. Reg. 213/07: FIRE CODE

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CATEGORY:	Environmental Health & Safety	NUMBER:	EHS.30.01.129
SUBJECT:	Mobile Elevated Work Platform	EFFECTIVE:	August 1, 2021
REPLACES:	N/A	PAGE(S):	1 of 1

POLICY:

Zehr Group (ZG) recognizes the use of Mobile Elevating Work Platforms (MEWPs) can lead to serious injuries to not only operators, but those working in proximity. ZG is committed to providing a safe workplace and as such developed this policy to ensure the safe use of MEWP's at all ZG sites.

SCOPE:

This policy applies to all ZG employees, Subcontractors, and visitors.

DEFINITIONS:

N/A

REFERENCES AND RELATED FORMS, POLICIES AND PROCEDURES:

Corresponding Procedure: EHS.30.02.129 Mobile Elevated Work Platform R.S.O. 1990, CHAPTER O.1 Occupational Health & Safety Act Regulation 213/91 Construction Projects Regulation 851 Industrial Establishments

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Dates Revised: January 23, 2023	
Dates Reviewed:	



CATEGORY:	Environmental Health & Safety	NUMBER:	EHS.30.01.130
SUBJECT:	Workplace Security	EFFECTIVE:	August 1, 2021
REPLACES:	N/A	PAGE(S):	1 of 1

POLICY:

Zehr Group (ZG) is committed to the providing a safe environment for everyone. ZG recognizes the significant hazards related to workplace violence and potential security risk factors, and the legal and moral responsibility to take every reasonable precaution in the circumstances to protect employees and others. ZG is committed to providing financial and human resources for the development, implementation and maintenance of a sustainable security protection and prevention program that will help to prevent or minimize security risk factors through hazard recognition, assessment, control and evaluation processes. All workplace parties are required to comply with the policy and any associated procedures as appropriate.

The purpose of the security policy is to ensure the:

- Protection of organizational property and people working, visiting, receiving and/or providing services at or for ZG; and
- Prevention of incident and accidents related to security risk factors and other related workplace hazards.

SCOPE:

This policy applies to all ZG employees, Subcontractors and Visitors.

DEFINITIONS:

Security - The prevention of harm and property damage, the protection of property and of all persons from potential harm related to workplace violence exposures, and various occupational health and safety hazards in the workplace. Security is ensured through proactive measures, processes, monitoring, and patrolling, and through emergency responses as necessary. It may include, but is not limited to, the implementation of a safety management plan; appropriately trained and competent personnel who fulfill security functions, policy, procedures, processes, protocols, and activities; and the use of equipment and materials.

REFERENCES AND RELATED FORMS, POLICIES AND PROCEDURES:

Corresponding Procedure: EHS.30.02.130 Workplace Security R.S.O. 1990, CHAPTER O.1 Occupational Health & Safety Act

Policy owner and for inquiries:	Health & Safety Lead
Approved by: President: Zehr Levesque:	Julu N
Approved by: President/COO Zehr Group of	of Companies:
Dates Revised: January 23, 2023 Dates Reviewed:	



CATEGORY:	Environmental Health & Safety	NUMBER:	EHS.30.01.131
SUBJECT:	Workplace Violence	EFFECTIVE:	August 1, 2021
REPLACES:	N/A	PAGE(S):	1 of 2

POLICY:

Zehr Group (ZG) the responsibility of its managers and all of its employees to maintain a workplace free from threats and acts of violence. ZG will work to provide a safe workplace for employees and for visitors to the workplace. Each employee, and everyone with whom we come into contact in our work, deserves to be treated with courtesy and respect.

SCOPE:

This policy applies to all ZG employees, Subcontractors and Visitors.

DEFINITIONS:

Physical assault - Is any physical force or threat of physical force to create fear and control another person. Some examples include: hitting, blocking, shoving, choking, slapping or biting, or pulling hair; "caring" for the victim in an abusive way, threats of violence, and using a weapon or other objects to threaten, hurt or kill.

Sexual assault - Is any unwanted sexual act done by one person to another. Examples include: kissing or forcing/coercing the person into kissing; touching the person's body with or without clothes on; forcing/coercing the person to masturbate; sexual intercourse (anal or vaginal), penetrating with an object; causing bodily harm; removing or attempting to remove clothing; 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.

Threat (verbal or written) - Is a 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 do harm, for example, "I am going to make you pay for what you did to me." A conditional threat involves a condition, for example, "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/Psychological abuse - Is 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. Examples include: swearing, put-downs/name calling over a period of time, labelling the victim in a derogatory way such stupid, crazy or irrational, acts of humiliation, extreme jealous behaviour, attacking the victim's self-esteem in other ways. It can also include harming pets and damaging property.

Workplace Bullying - Repeated and persistent negative acts towards one or more individuals, which involve a perceived power imbalance and create a hostile work environment (Salin, 2003)

Workplace violence is -

• 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; or,
- 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.

REFERENCES AND RELATED FORMS, POLICIES AND PROCEDURES:

Corresponding Procedure: EHS.30.02.131 Workplace Violence R.S.O. 1990, CHAPTER O.1 Occupational Health & Safety Act Regulation 213/91 Construction Projects Regulation 851 Industrial Establishments

Approved by: President: Zehr Levesque: Approved by: President/COO Zehr Group of Companies: Dates Revised: January 23, 2023 Dates Reviewed:



CATEGORY:	Human Resources	NUMBER:	HR.20.01.101
SUBJECT:	Workplace Harassment and Workplace Sexual	EFFECTIVE:	July 1, 2021
	Harassment		
REPLACES:	N/A	PAGE(S):	1 of 4

POLICY:

It is the policy of Zehr Group (ZG) that all employees have a right to work in an environment free of personal and/or sexual harassment and to be treated with respect, courtesy and tact. ZG and its' employees share the responsibility of ensuring an environment free from harassment. Workplace harassment is behaviour that is prohibited under the *Ontario Human Rights Code* and the *Occupational Health and Safety Act*.

ZG will not tolerate, condone or ignore harassment and is committed to promoting appropriate standards of conduct at all times. All employees are responsible for respecting the dignity and rights of others, including their co-workers, visitors, contractors, and the public. All employees have a right to work in a respectful workplace and also to expect co-workers, visitors, contractors, and the public to treat them respectfully.

SCOPE:

This policy applies to all employees actively employed with ZG.

Workplace Harassment

Workplace harassment may have some or all of the following components:

- It is generally repetitive, although a single *serious* incident may constitute workplace harassment if it undermines the recipient's psychological or physical integrity and has a lasting harmful effect;
- It is hostile, abusive or inappropriate; or
- It affects the person's dignity or psychological integrity.

Some examples of workplace harassment may include:

- Verbally abusive behaviour such as yelling, insults, and name calling including remarks, jokes or innuendos that demean, ridicule, intimidate or offend;
- Workplace pranks or practical jokes that embarrass or insult someone;
- Negative blogging, cyber-bullying;
- Failure to maintain a professional decorum, such as, regular use of profanity and abusive or offensive language;
- Aggressive behaviours such as slamming doors or throwing objects;
- Sabotaging someone else's work; or
- Making false allegations about someone.

Some examples of workplace discriminatory harassment may include but are not limited to:

- Offensive comments, jokes or behaviour that disparage or ridicule a person's membership in one of the protected groups;
- Imitating a person's accent, speech or mannerisms;
- Persistent or inappropriate questions about whether a person is pregnant, has children or plans to have children; or

• Inappropriate comments or jokes about an individual's age, sexual orientation, same sex partnership status, attire, customs or personal appearance.

Poisoned Work Environment

Harassing conduct or comments can poison someone's working environment making it a hostile or uncomfortable place to work, even if the person is not being directly targeted. This is commonly referred to as a poisoned working environment and it is a form of harassment.

Some examples of actions that may create a poisoned work environment may include:

- Displaying offensive or sexual materials such as posters, pictures, calendars, websites or screen savers;
- Distributing offensive email messages or attachments such as pictures or video files; or
- Jokes or insults that are offensive, racist or discriminatory in nature.

Workplace Sexual Harassment

Both men and women can be victims of sexual harassment and persons can harass someone else of the same or opposite sex.

Some examples of sexual harassment may include:

- Sexual advances or solicitations that the recipient does not welcome and which the person engaging in the conduct knows or ought reasonably to know would be unwelcome;
- Threats, punishment or denial of a benefit for refusing a sexual advance;
- Leering (persistent sexual staring);
- Displaying or circulating sexually offensive material such as posters, pictures, calendars, cartoons, screen savers, pornographic or erotic websites or other electronic material;
- Sexually suggestive or obscene comments or gestures;
- Unwelcome remarks, jokes, innuendoes, propositions or taunting about a person's body, clothing or sex;
- Persistent, unwanted attention after a consensual relationship ends;
- Physical contact of a sexual nature, such as touching or caressing; or
- Sexual assault.

What Workplace Harassment IS NOT

Reasonable action or conduct by a manager or supervisor that is part of his or her normal work function would not normally be considered workplace harassment. This is the case even if there are sometimes unpleasant consequences for a worker.

For example, workplace harassment does not include:

- Requesting medical documents or other appropriate documentation to support of an absence from work or the need for workplace accommodation;
- Measures to correct performance deficiencies, such as placing someone on a performance improvement plan or criticism of an employee's conduct or performance;
- Transfers to another project, department or division;
- Changes in work assignments;
- Job assessment or observations;
- Enforcement of ZG rules and procedures; and
- Administering disciplinary action for workplace infractions.

Also, differences in opinion or minor disagreements between co-workers would not generally be considered workplace harassment.

In addition, this policy is not meant to inhibit the free speech of our employees nor is it intended to interfere with the normal social relations that are part of working within ZG.

Confidentiality

The Occupational Health and Safety Act S 32.0.7(1)(b) requires that a worker who has allegedly experienced workplace harassment and the alleged harasser be informed of the results of the investigation and of any corrective action that has been taken or will be taken by ZG as a result of an investigation. Every effort will be taken to ensure confidentiality for employees involved in incidents of harassment. However, complete confidentiality is not possible in all circumstances and cannot be guaranteed. Limited information may need to be disclosed for the purposes of investigations, taking corrective action with respect to the incident or complaint, or for legal compliance requirements.

No Reprisals

No reprisals or threats of reprisal will be made or taken against an employee who files a complaint in good faith. If an employee believes that a reprisal or threat of reprisal has been made or taken, he/she should immediately report this to his/her immediate supervisor/manager, their Supervisor or Human Resources. Employees who engage in reprisals or threats of reprisals may be disciplined up to and including termination.

Complaints Not In Good Faith

An employee who makes a complaint not in good faith may be disciplined up to and including termination. Such discipline is not a reprisal or breach of this policy.

Work Refusal

There is no legislative right that allows employees to refuse work because of harassment. Refer to Health and Safety *Refusal to Work* policy.

Reporting Workplace Harassment

ZG has set up guidelines for employees to follow to report harassment issues. Refer to procedure HR.20.02.101 Workplace Harassment and Workplace Sexual Harassment.

DEFINITIONS:

Workplace Harassment – *The Occupational Health and Safety Act* defines workplace harassment as engaging in a course of vexatious comment or conduct against a worker in a workplace that is known, or ought reasonably to be known as, unwelcome or workplace sexual harassment.

Discriminatory Harassment – The *Ontario Human Rights Code* defines discriminatory harassment as a course of improper conduct or comments based on one or more of the protected grounds listed in the Code, which a person knows or ought reasonably to know would be unwelcome. Protected grounds under the Code include race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, age; marital status; family status handicap; and any other legally protected status under the Code.

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

Workplace – A building, vehicle, open, external area where a worker is required to be there, or near there, as part of their job. Workplace may be any land, premises, location, internal or near which an employee works.

REFERENCES AND RELATED FORMS, POLICIES AND PROCEDURES:

Corresponding Procedure: HR.20.02.101 Workplace Harassment and Workplace Sexual Harassment Occupational Health and Safety Act, Ontario Ontario Human Rights Code EHS.30.01.131/ EHS.30.02.131 Violence Prevention EHS.30.01.106/ EHS.30.02.106 Right to Refuse Unsafe Work

Policy owner and for inquiries: Manager Administration and Human Resources

Approved by: President: Zehr Levesque:	
Approved by: President/COO Zehr Group of Companies:	
Dates Revised: January 23, 2023 Dates Reviewed:	



CATEGORY:	Environmental Health & Safety	NUMBER:	EHS.30.01.132
SUBJECT:	COVID-19	EFFECTIVE:	August 1, 2021
REPLACES:	N/A	PAGE(S):	1 of 2

POLICY:

The purpose of this policy is to outline the prevention and response actions for COVID-19 as part of Zehr Group (ZG) emergency preparedness and response plan at the workplace. The policy is based on information available at the time of its development, and is subject to change based on further information provided by government, health authorities, and the latest evidence.

SCOPE:

This policy applies to all ZG employees. All Contractors/Sub-Contractors must ensure their employees working at any Zehr Levesque site are aware of and comply with the requirements of this policy and procedure.

DEFINITIONS:

Emergency Preparedness Plan - Emergency preparedness is a cyclic approach that includes prevention activities, preparing a plan for emergencies, testing out the plan or the response, and establishing procedures and activities to bring the organization back to a routine or acceptable level of operation following an emergency.

Pandemic – An epidemic of disease that has spread across a large region, for example across multiple countries or international borders, and affecting a large number of people.

Infection Prevention and Control - A discipline concerned with preventing infections and its management. Practices of infection prevention and control address factors related to the spread of infections and preventive measures such as hand washing, cleaning, disinfecting, sterilizing, and vaccinating. Other aspects include surveillance, monitoring, investigation and management.

COVID-19 - Coronavirus disease (COVID-19) is an infectious disease caused by a newly discovered coronavirus. The virus is causing an outbreak of respiratory (lung) disease. The World Health Organization declared COVID-19 a pandemic on March 11, 2020.

COVID-19 Symptoms - Many symptoms of COVID-19 resemble cold and flu symptoms. Common symptoms of COVID-19 include fever, new or worsening cough, and shortness of breath. Given the ongoing emergence of new information, the Ministry of Health's reference document for symptoms will be used for an updated list of commonly associated symptoms.

Confirmed vs Probable Cases - Case definitions are for surveillance purposes of infectious disease. A probable case is generally one that meets a set of criteria related to a particular disease of interest. A confirmed case is generally one that meets a set of criteria related to a particular disease of interest and is validated with laboratory confirmation of that disease.

Active Screening vs Passive Screening - Screening is a process for surveilling and identifying probable cases to help guide response actions. Active screening involves tests, examinations, and interviewing. Passive screening involves posting signage and messaging.

EHS.30.01.105 Page 2 of 2

REFERENCES AND RELATED FORMS, POLICIES AND PROCEDURES:

Corresponding Procedure: EHS.30.02.132 COVID-19 R.S.O. 1990, CHAPTER O.1 Occupational Health & Safety Act

Policy owner and for inquiries: Health & Safety Lead

A Approved by: President: Zehr Levesque: 4 14 Approved by: President/COO Zehr Group of Companies: Dates Revised:

Dates Revised: Dates Reviewed: January 23, 2023



CATEGORY:	Environmental Health & Safety	NUMBER:	EHS.30.01.133
SUBJECT:	Traffic Control	EFFECTIVE:	November 8, 2022
REPLACES:	N/A	PAGE(S):	1

POLICY:

Zehr Group (ZG) is committed to the protection of employees from occupational injury or illness. Traffic Control presents significant hazards to workers and the public, ZG shall comply with the Occupational Health & Safety Act; Construction Regulation 213/91 as outlined in the training requirements for workers on construction projects.

SCOPE:

This policy applies to all ZG employees and Subcontractors

DEFINITIONS:

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

Construction - Includes erection, alteration, repair, dismantling, demolition, structural maintenance, painting, land clearing, earth moving, grading, excavating, trenching, digging, boring, drilling, blasting, or concreting, the installation of any machinery or plant, and any work or undertaking in connection with a project but does not include any work or undertaking underground in a mine.

Traffic Control Plan (TCP) – A Traffic Control Plan (TCP) consists of written instructions, that a contractor uses for supervision of the movement of people, goods while guiding and protecting traffic passing through or around a work zone.

REFERENCES AND RELATED FORMS, POLICIES AND PROCEDURES:

Corresponding Procedure: EHS.30.02.133 – Traffic Control R.S.O. 1990, CHAPTER O.1 Occupational Health & Safety Act Regulation 213/91 Construction Projects Ontario Traffic Manual Book 7

Policy owner and for inquiries: Health & Safety Lead
Approved by: President: Zehr Levesque:
Approved by: President/COO Zehr Group of Companies:
Dates Revised:
Dates Reviewed: January 23, 2023



CATEGORY:	Environmental Health & Safety	NUMBER:	EHS.30.01.134
SUBJECT:	Environmental Protection	EFFECTIVE:	November 8, 2022
REPLACES:	N/A	PAGE(S):	1

POLICY:

Zehr Group (ZG) is committed to protecting the environment and maintaining the highest standards in public health and safety through contributing to the sustainability of the communities and economies in which we operate.

ZG is dedicated to ensuring that all applicable regulatory environmental protection requirements are met or exceeded, to minimizing the impact of our operations on the environment and to demonstrating leadership by integrating environmental considerations into all our business practices.

Through conducting an environmental impact assessment, ZG will implement site-specific environmental protection and emergency plans where any impact to the environment is identified.

ZG will give appropriate weight to this environmental policy when making future planning and investment decisions.

SCOPE:

This policy applies to all ZG employees and Subcontractors.

DEFINITIONS:

N/A

REFERENCES AND RELATED FORMS, POLICIES AND PROCEDURES:

N/A

Policy owner and for inquiries:	Health & Safety Lead	
Approved by: President: Zehr Levesque:	John W Co	
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