



***DUNCOR***  
**ENTERPRISES INC.**

# **OCCUPATIONAL HEALTH & SAFETY MANAGEMENT SYSTEM**

**DOCUMENT:** HEALTH & SAFETY MANUAL  
**APPROVED BY:** BRIAN DUNCAN  
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## Table of Contents

<b>ELEMENT 1: HEALTH &amp; SAFETY MANAGEMENT</b> .....	<b>4</b>
1.1 HEALTH & SAFETY POLICY STATEMENT .....	5
1.2 WORKPLACE VIOLENCE & HARASSMENT POLICY STATEMENT .....	6
1.3 RETURN TO WORK & RE-EMPLOYMENT POLICY STATEMENT .....	7
1.4 ENVIRONMENTAL POLICY .....	8
1.5 ACCESSIBILITY POLICY STATEMENT .....	9
1.6 DISCONNECTING FROM WORK POLICY .....	10
1.7 ELECTRONIC MONITORING POLICY .....	11
1.9 SAFETY MANAGEMENT SYSTEMS .....	13
1.10 DOCUMENT & RECORD CONTROL .....	18
1.11 DIGITAL PLATFORM .....	25
1.12 EMPLOYEE HAZARD REPORTING & THE RESOLUTION PROCESS .....	27
<b>ELEMENT 2: HAZARD ASSESSMENTS &amp; CONTROLS</b> .....	<b>31</b>
2.1 HAZARD IDENTIFICATION AND RISK ASSESSMENTS POLICY STATEMENT .....	32
2.2 HAZARD IDENTIFICATION AND RISK ASSESSMENTS .....	33
2.3 HAZARD RATING SYSTEM .....	41
2.4 PROJECT SPECIFIC EMERGENCY RESPONSE PLAN .....	43
2.5 CRITICAL TASK RISK ASSESSMENTS (CTRA) .....	45
2.6 JOB HAZARD ANALYSIS (JHA) .....	47
<b>ELEMENT 3: CONTROLS</b> .....	<b>50</b>
3.1 CONTROLS POLICY STATEMENT .....	51
3.2 HAZARD CONTROLS .....	52
3.3 SAFE WORK PRACTICES .....	56
3.4 SAFE JOB PROCEDURES .....	58
<b>ELEMENT 4: PROCUREMENT &amp; CONTRACTOR MANAGEMENT</b> .....	<b>60</b>
4.1 PROCUREMENT & CONTRACTOR MANAGEMENT POLICY STATEMENT .....	61
4.2 PROCUREMENT & CONTRACTOR MANAGEMENT .....	62
<b>ELEMENT 5: COMPANY RULES</b> .....	<b>69</b>
5.1 COMPANY RULES POLICY STATEMENT .....	70
5.2 COMPANY RULES .....	71
5.3 ACCOUNTABILITY & DISCIPLINARY PROCEDURE .....	76
5.4 ATTENDANCE POLICY .....	79
5.5 VACATION POLICY .....	81
5.6 COMPANY PROVISIONS .....	82
5.7 DRUG, ALCOHOL & SMOKING POLICY .....	83
5.8 AFTER HOURS WORK POLICY .....	85
5.9 WORKING ALONE POLICY .....	87
5.10 FITNESS FOR DUTY POLICY .....	89
5.11 CELL PHONE USE POLICY .....	93
5.12 DRIVER SAFETY .....	95
5.13 COMPANY CREDIT CARD USE .....	96
<b>ELEMENT 6: PERSONAL PROTECTIVE EQUIPMENT</b> .....	<b>97</b>
6.1 PERSONAL PROTECTIVE EQUIPMENT POLICY STATEMENT .....	98
6.2 PERSONAL PROTECTIVE EQUIPMENT .....	99
<b>ELEMENT 7: PREVENTATIVE MAINTENANCE</b> .....	<b>103</b>
7.1 PREVENTATIVE MAINTENANCE POLICY STATEMENT .....	104
7.2 PREVENTATIVE MAINTENANCE .....	105
<b>ELEMENT 8: TRAINING &amp; COMMUNICATION</b> .....	<b>114</b>
8.1 TRAINING POLICY STATEMENT .....	115
8.2 SAFETY EDUCATION & TRAINING .....	116
8.3 NEW WORKER / RETURNING WORKER ORIENTATION .....	126



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<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

8.4	COMMUNICATION POLICY STATEMENT .....	130
8.5	COMMUNICATION .....	131
8.6	TOOLBOX TALKS .....	136
ELEMENT 9: WORKPLACE INSPECTIONS .....		138
9.1	WORKPLACE INSPECTIONS POLICY STATEMENT .....	139
9.2	WORKPLACE INSPECTIONS .....	140
ELEMENT 10: INVESTIGATIONS & REPORTING .....		147
10.1	INVESTIGATIONS AND REPORTING POLICY STATEMENT .....	148
10.2	INCIDENT MANAGEMENT .....	150
13.2	O.REG. 420/21 – SEC. 51 TO 53.1: NOTICES AND REPORTS– FATALITIES, CRITICAL INJURIES, OCCUPATIONAL ILLNESSES AND OTHER INCIDENTS .....	158
ELEMENT 11: EMERGENCY PREPAREDNESS .....		162
11.1	EMERGENCY PREPAREDNESS POLICY STATEMENT .....	163
11.2	EMERGENCY PREPAREDNESS .....	165
ELEMENT 12: STATISTICS & RECORDS .....		172
12.1	STATISTICS & RECORDS POLICY STATEMENT .....	173
12.2	STATISTICS & RECORDS .....	174
ELEMENT 13: LEGISLATION & OTHER REQUIREMENTS .....		179
13.1	LEGISLATION & OTHER REQUIREMENTS POLICY STATEMENT .....	180
13.2	ROLES & RESPONSIBILITIES .....	181
13.3	WHMIS (WORKPLACE HAZARDOUS MATERIAL INFORMATION SYSTEM) .....	188
13.4	CHEMICAL USE, HANDLING, STORAGE AND TRANSPORT .....	190
13.5	SILICA EXPOSURE POLICY .....	192
13.6	VIBRATION CONTROL POLICY .....	195
13.7	NOISE CONTROL PROCEDURE .....	197
13.8	HEAT STRESS PREVENTION POLICY .....	199
13.9	COLD STRESS PREVENTION POLICY .....	202
13.10	MUSCULOSKELETAL DISORDER (MSD) PREVENTION PROGRAM .....	205
13.11	HYGIENE POLICY .....	208
13.12	CONFINED SPACE PROCEDURE .....	210
13.13	AIR QUALITY TESTING PROCEDURE .....	215
13.14	INFECTION CONTROL .....	219
13.15	FIRST AID REQUIREMENTS .....	221
13.16	JOINT HEALTH & SAFETY COMMITTEE .....	223
13.17	WORKER HEALTH & SAFETY REPRESENTATIVE (WHSR) .....	225
13.18	WORKPLACE VIOLENCE & HARASSMENT PROGRAM .....	227
13.19	RETURN TO WORK PROCEDURE .....	234
ELEMENT 14: MANAGEMENT REVIEW & CHANGE MANAGEMENT .....		242
14.1	MANAGEMENT REVIEW POLICY STATEMENT .....	243
14.2	MANAGEMENT REVIEW .....	244
14.3	MANAGEMENT OF CHANGE POLICY STATEMENT .....	248
14.4	MANAGEMENT OF CHANGE .....	249



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**WELCOME TO DUNCOR ENTERPRISES INC.**

Welcome to Duncor Enterprises Inc. (“Duncor”). This manual is designed to assist you and to serve as a reference for questions concerning company safety program requirements.

# **ELEMENT 1: HEALTH & SAFETY MANAGEMENT SYSTEMS**

<b>REVISION LOG</b>				
<b>YEAR.REV #</b>	<b>REVISED BY</b>	<b>DATE REVISED</b>	<b>APPROVED BY</b>	<b>DESCRIPTION OF CHANGES</b>
2022.1	KELCIE STEVENSON	01.2022	BRIAN DUNCAN	<ul style="list-style-type: none"> <li>HSMS2022.1 SUPERSEDED BY HSMS2023.1</li> </ul>
2023.1	KELCIE STEVENSON	01.25.2023	BRIAN DUNCAN	Included: <ul style="list-style-type: none"> <li>Document and Record Control Procedure</li> <li>SafetyLoop Procedure</li> <li>Roles and Responsibilities for all relevant workplace parties</li> </ul> Modified: <ul style="list-style-type: none"> <li>All policy statements to express senior management’s commitment</li> <li>Policy statements not specifically belonging to any element within this manual are listed in Element 1</li> </ul>
2024.1	KELCIE STEVENSON	01.24.2024	BRIAN DUNCAN	Withdrew: <ul style="list-style-type: none"> <li>HSMS2023.1 procedure</li> </ul> Updated <ul style="list-style-type: none"> <li>Table of contents</li> <li>Section 1.11 Digital Platform</li> </ul> Included <ul style="list-style-type: none"> <li>Section 1.8 Social Media Policy</li> </ul>
2025.1	KELCIE STEVENSON	01.22.2025	BRIAN DUNCAN	Modified: <ul style="list-style-type: none"> <li>Workplace Violence and Harassment Policy Statement</li> </ul> Withdrew: <ul style="list-style-type: none"> <li>HSMS2024.1 procedure</li> </ul>
2026.1	KELCIE STEVENSON	01.21.2026	BRIAN DUNCAN	Modified: <ul style="list-style-type: none"> <li>Health and Safety Policy Statement- added line to include virtual and remote workplace locations</li> </ul> Withdrew: <ul style="list-style-type: none"> <li>HSMS2025.1 procedure</li> </ul>



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## 1.1 HEALTH & SAFETY POLICY STATEMENT

Duncor considers the Environment and the Health and Safety of all to be the base upon which all operations are set. Duncor recognizes that all workers have the right to a safe and healthy work environment and therefore protection of such is the guiding principle of all operations at Duncor.

Duncor recognizes remote and virtual work locations as part of the workplace and is committed to ensuring everyone remains healthy, safe and compliant at all premises.

Duncor Senior Management is committed to being in compliance with all applicable OH&S legal and other requirements, policies and procedures as they apply to each work area. Duncor shall meet or exceed these requirements and shall ensure that all employees are instructed and abide by these requirements. Duncor is aware that it is the right of all workers to work in a safe and healthy environment as outlined by the regulatory requirements.

Duncor will develop and maintain a safe work environment, a well-trained work force and employee safety awareness through training of the company HSMS. In so doing we are confident that the overall goal of an injury and accident-free workplace will be obtained.

It is Duncor's responsibility to develop and maintain our Health and Safety Management System (HSMS) to successfully turn the philosophy of our Internal Responsibility System into practice. Our HSMS is applicable to our employees, subcontractors, visitors and service providers. All workplace parties may refer to the programs contained within this manual and/or the Occupational Health and Safety Act to find their responsibilities. Senior Management will ensure that all employees, subcontractors, service providers and visitors will be introduced with their roles and responsibilities at the time of orientation.

All contractors, sub-contractors and independent operators are required to know, understand and comply with the Occupational Health and Safety Act and all applicable Regulations as well as the Duncor Health & Safety Management Program and any relevant procedures.

All Duncor employees are required to know, understand and comply with all legislative requirements including the Occupational Health and Safety Act and applicable Regulations, as well as company policies and procedures and will receive ongoing safety training. Workers are required to report any unsafe acts or conditions, report any injury, incident or near miss to their Supervisors / Forepersons immediately. All employees are expected to contribute to the development and implementation of the Health & Safety Management Program and work safely at all times.

Supervisors / Forepersons will ensure that the safety program is implemented at the field level, providing necessary training, information and direction. They will participate in and ensure that all Joint Health and Safety Committee activities are completed and ensure that the workplace is audited on a regular basis.

The Safety Manager will establish, implement and revise the Health and Safety Management Program and hold supervisory staff accountable for its implementation. The Safety Manager will report and review with Senior Management the Health and Safety Management Program annually, make all revisions necessary and provide the necessary training instruction and assistance to the supervisory staff.

Senior Management is committed to providing a safe and healthy work environment for the prevention of injuries and illness and is committed to achieving this in a spirit of consultation and co-operation with workers. We are dedicated to setting and reviewing OHS objectives, at minimum, annually or as needed to encourage continuous improvement of Duncor's HSMS and Health and Safety performance. In substantiation of my commitment to Health and Safety, I insist that accident prevention and the protection of the Health and Safety of all workers is a top priority in all aspects of every project conducted by Duncor.

**Brian Duncan, Vice President**

January 23, 2026



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## 1.2 WORKPLACE VIOLENCE & HARASSMENT POLICY STATEMENT

Duncor is committed to the safety and security of our workers while at work. Management recognizes that it is the right of all employees of Duncor to work in a violence and harassment free environment. It is the policy of this company to ensure that all reasonable steps are taken to prevent incidents resulting from acts of workplace violence and harassment.

Duncor has implemented standards of care designed at promoting violence and harassment awareness, specifically acknowledging the impact of such behaviour in the workplace and the effects to victims of violence and harassment. The purpose of this policy is to ensure that:

- Individuals understand the definitions of Workplace Violence and Harassment;
- Individuals understand the effects of Workplace Violence and Harassment;
- Individuals understand their rights to report any act of Workplace Violence and Harassment;
- Individuals understand the consequences for contravening this policy.

In addition, this policy will provide the provisions for a specific program;

- **Assessing** the workplace for actual and potential risks associated with Workplace Violence and Harassment.
- **Establishing** written measures and procedures designed to reduce and control the risk of Workplace Violence and Harassment.
- **Provide** information to individuals indicating measures and procedures for reporting and investigating incidents regarding Workplace Violence or Harassment.
- **Provide** assistance to workers who have been victimized by acts of Violence or Harassment in the Workplace.
- **Provide** a system for responding to acts of Violence or Harassment in the Workplace.

Our company has implemented procedures that are to be followed in the event an incident involving workplace violence or harassment is reported or discovered. These procedures will ensure that the circumstances are promptly investigated and resolved in a timely manner.

Workplace violence or harassment will not be tolerated by any persons employed in our workplace(s) including virtually through the use of information and communications technology. This policy also applies to contractors, subcontractors, visitors, agents or other persons otherwise performing services for our company. Managers, Supervisors / Forepersons, workers, contractors, subcontractors, visitors and/or other agents are accountable to the company owner for compliance of this policy. This policy will be reviewed on an annual basis by management, and changes will be implemented as required.

In addition to my commitment to health and safety, I am committed to the prevention and control of violence and harassment in the workplace, as well as the promotion of violence and harassment awareness for all employees of Duncor.

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**Brian Duncan, Vice President**  
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### 1.3 RETURN TO WORK & RE-EMPLOYMENT POLICY STATEMENT

Duncor management is committed to the safe return to work for any workers who have sustained workplace injuries while employed by Duncor. Through the Return-to-Work program, Duncor will provide gainful employment to workers in the event of a disabling workplace injury.

Supervisors / Forepersons are responsible to participate in the implementation of the RTW program where and when it is required. Once a worker has been placed on the RTW program, the Supervisor / Foreperson will be responsible for follow-up with the program, constant communication with the worker, and updating the safety Manager, where required.

The RTW program has two main functions:

1. To prevent workers from losing time due to workplace injuries (achieved with the use of the WSIB Functional Abilities Form, provided at the initial stage by the treating medical physician.
2. To return workers to gainful employment as soon as medically authorized through permanently modified work or temporary modified work.

Workers are responsible to report all workplace injuries or incidents to their immediate Supervisor / Foreperson. Workers are also responsible to ensure all medical visits are reported to the employer and applicable forms are filled out and returned to the employer, health care practitioner or WSIB, where required. Workers are expected to participate in the RTW program with their Supervisor / Foreperson and ensure active two-way communication to ensure the success of the RTW program.

All Managers, supervisors and foremen will receive copies of the RTW program and participate in an orientation and instructional training session to ensure full understanding of the RTW program. In addition, all Duncor employees will be made aware of the RTW program during their orientation/training session and the review of the Employee Safety Guidelines.

In addition to my commitment to health and safety, I am committed to ensuring an early and safe return to work for any worker suffering from a disabling workplace injury. Duncor will accommodate, without undue hardship, any employee on the Return-to-Work program.

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## 1.4 ENVIRONMENTAL POLICY

### Chemical Commitment Statement

Duncor is committed to taking every practical precaution towards ensuring that products do not present an unacceptable level of risk to employees, customers, the public or the environment.

Written procedures, protocols, and methodologies will be established to define responsible development, introduction, manufacture, transportation, storage, handling, distribution, use and ultimate disposal of chemicals and chemical products to minimize and eliminate, where possible, adverse effects on the health and well-being of humans and on the environment.

- All effort will be made to prevent pollution of the air, land, or water in and around the construction site by all contractors/subcontractors, consultants, workers, Supervisors / Forepersons, and trade contractors.
- All chemicals brought onto the site must be in secure containers, properly identified, labelled and complete with SDS's. All spills must be reported immediately to the site office or the site safety professional.
- No chemicals, oil or contaminated water are to be disposed of down any municipal drains.
- Waste Management – all work and storage areas must be kept tidy, and waste segregated and removed on a regular basis. Recycling protocols will be practiced.
- Noise and vibrations – ensure all vehicles are used in a manner bearing in mind special considerations such as time of day, weekends, noise levels and surrounding residential areas.
- Ensure equipment is serviced and maintained on a regular basis to minimize leaks, air pollutants, etc.
- Practice conservation by turning off machinery, switches and other power sources when not in use.

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## 1.5 ACCESSIBILITY POLICY STATEMENT

Duncor is committed to excellence in serving all customers including people with disabilities. In fulfilling this commitment, we will:

- Ensure that our staff are trained in and familiar with various assistive devices that may be used by customers with disabilities while accessing our facility or dealing with our workers / road crews.
- Communicate with people with disabilities in a way that takes into account of their disability.
- Welcome support people and service animals, when they are required to accompany a person with a disability. Service animals are permitted on the parts of our premises that are open to the public.
- In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, Duncor will notify customers promptly. This clearly posted notice will include information regarding the reason for the disruption, its anticipated length of time and a description of alternative facilities or services, if available. The notice will be placed at our Head Office, 101 Big Bay Point Rd., Barrie, ON, as well as on the Duncor website.

### TRAINING FOR STAFF

Duncor will provide training to employees, volunteers and others who deal with the public or other third parties on their behalf. Individuals in the following positions will be trained: **Managers, Customer's Service Representatives, Crew Workers**. This training will be provided to staff annually during spring kickoff training (Corporate Orientation).

Training will include:

- An overview of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard,
- Duncor's Accessible Customer Service Plan,
- How to interact and communicate with people with various types of disabilities,
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person,
- What to do if a person with a disability is having difficulty in accessing Duncor's goods and services,
- Updates when changes are made to our Accessible Customer Service Plan.

### FEEDBACK PROCESS

Customers who wish to provide feedback on the way Duncor provides goods and services to people with disabilities can contact us via email, [info@duncor.ca](mailto:info@duncor.ca) or by telephone 705-730-1999. Customers can expect to hear back within 24 hours. Complaints will be addressed according to our organization's regular complaint management procedures.

### MODIFICATIONS TO THIS OR OTHER POLICIES

Any policy of Duncor that does not respect or promote the dignity and independence of people with disabilities will be modified or removed.

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## 1.6 DISCONNECTING FROM WORK POLICY

Duncor is committed to fostering a safe and healthy work environment for all employees. This Policy sets out Duncor’s expectations around work-related communications in an effort to assist employees in disconnecting from work during appropriate times.

“Disconnecting from work” means not engaging in work-related communications, including emails, telephone calls, video calls or the sending or reviewing of other messages, so as to be free from the performance of work, as defined by The Working for Workers Act, 2021, S.O. 2021, c. 35 - Bill 27.

This Policy applies to all employees of Duncor. In general, the Company does not expect employees to read or respond to work-related communications outside of their normal working hours, subject to the following exceptions:

- where the employee’s role is managerial or supervisory in nature, in which case operational or business needs may require communications outside of normal working hours
- in instances involving unforeseen operational or business needs
- in cases of emergencies
- in other situations that may arise, at the discretion of the Company

Should employees have concerns about this policy, they are encouraged to speak to their supervisor or management. Management will notify employees of any changes in accordance with applicable employment standards legislation.

Employees’ physical and mental well-being will benefit from right to disconnect from their workday and their job responsibilities outside of designated work hours. Duncor Enterprises Inc. will take every precaution reasonable in the circumstances for the protection of a worker, as required by the Occupational Health and Safety Act.

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## 1.7 ELECTRONIC MONITORING POLICY

The Ontario Working for Workers Act, 2022 requires certain employers to introduce a written policy regarding its electronic monitoring practices. Duncor Enterprises Inc. Electronic Monitoring Policy will communicate the Company's intent to monitor its employees, provide information about the categories of data collected, inform employees how their data will be secured and used. This policy applies to all employees, visitors, and across all company premises.

### Video Surveillance

Video surveillance equipment is used at all company premises to ensure that employees, visitors, and company-owned assets are kept secure from theft and vandalism. Surveillance is recorded 24 hours a day, 7 days a week. Should unlawful activity be discovered information captured by video surveillance will be disclosed to authorized third parties. Video surveillance will not be used in areas where employees have reasonable expectation of privacy. Where video surveillance equipment is used the equipment will be made clearly visible.

### Electronic Logging Devices

The Highway Traffic Act, regulation 555/06: Hours of Service requires the use of Electronic Logging Devices (ELD) in certain commercial motor vehicles. Duncor has installed ELDs in all company commercial motor vehicles to comply with these regulations. The ELD system is used to record data on driver activity including hours of service and driver status as well as capture data on the vehicle's geography and operation. Fleet management software is monitored by management to analyze compliance with hours of service and the traffic laws under the provincial Highway Traffic Act while the vehicle is in use.

### Company Issued Assets

Duncor recognizes that its employees may use Company issued assets: computers and company provided smart phones, for personal tasks during their normal course of business. Duncor reserves the right to access their own equipment and monitor the use of that equipment to ensure network and data security. Employees must operate under the assumption that all traffic over company networks may be monitored and conduct themselves accordingly.

Only authorized personnel, including third parties, have access to electronically monitored data. All persons with access to confidential employee information, including data collected from electronic monitoring, are subject to the Company's confidentiality requirements.

Duncor will provide all current employees with access to or a copy of this Policy within 30 calendar days of implementation. All new employees hired will be provided a copy within 30 calendar days of employee's start date. Duncor will retain a copy of this Policy and any revised versions for a period of three years after it ceases to be in effect. This Policy may be amended at Duncor Enterprises Inc. sole discretion. Any revisions will be provided to all employees within 30 days of the date the amendment becomes effective.

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## 1.8 SOCIAL MEDIA POLICY

Duncor is committed to providing a healthy and safe workplace for all our workers. Management recognizes and respects the rights of its employees to use online social media tools as a form of self-expression. However, it is important that all workers be made aware of the implications of engaging in such forms of social media and online conversations that references the Company and/or employees' relationship with the Company and the public, and that employees recognize when the Company may be held responsible for their behaviour.

Though social media creates opportunities for personal expression it also creates risks and responsibilities. Everything posted to social media is public and accessible. You should assume that anything you do on social media, whether on a business or personal account, could be viewed by a fellow employee, supervisor, supplier, competitor, or potential customer. Your activity on social media reflects on Duncor and can impact the work environment.

It is important to take into consideration Duncor and fellow employees' privacy and to avoid uploading content without consent. Sharing unauthorized content on social media without permission and disclosing of non-public information of the Company, including confidential information violates confidentiality and should be avoided. Additionally, engaging in mockery, disrespect, or ridicule, is not keeping with fair competition. Avoid commenting on competitors, associates, or fellow employees in a negative way.

Duncor Enterprises Inc. respects the free speech rights of all its workers but advises to do so properly, exercising sound judgment and common sense. This policy applies to all management, employees, subcontractors, visitors, and service providers. Violation of this policy can result in disciplinary action up to and including termination of employment.

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## 1.9 SAFETY MANAGEMENT SYSTEMS

### OVERVIEW

Effective management, communication, operation and control of the workplace are vital to both health and safety as well as production goals. Clearly defined duties and responsibilities throughout the organization will ensure that workplace incidents and illnesses are minimized, and productivity maximized.

The management duties are clearly defined in the Occupational Health and Safety Act. These duties and responsibilities have been outlined in this program, as well as specific duties and responsibilities set forth by Duncor to ensure the fundamentals of due diligence are achieved.

Implementation and compliance with these duties and responsibilities is a mandatory function of the management team that will be continuously monitored, measured, and reviewed to ensure the fundamentals for continuous improvement are met.

Non-compliance with any of Duncor policies, programs, duties and responsibilities will result in disciplinary action set out by the Statement of Accountability and the Disciplinary Action System.

Penalties issued under the Occupational Health and Safety Act may include fines of \$1,500,000 and/or up to 1 year in jail per charge for corporations, and \$100,000 and/or up to 1 year in jail per charge for individuals. As the **Internal Responsibility System** interconnects each level of the organization, an infraction at one level may result in charges at one, or more levels of the organization, and may include numerous individuals and Duncor itself. It is therefore extremely important that all the individuals' duties and responsibilities throughout the organization are defined, understood and achieved to ensure that collectively, the organization can maintain the highest levels of due diligence.

### PURPOSE

The purpose of the program is to ensure that all individuals conducting work on a Duncor project are aware of their duties and responsibilities in the workplace and are provided with and able to practice the Fundamental of Due Diligence.

### PROGRAM GOALS

By clearly outlining and defining roles and responsibilities, Duncor is not diminishing the roles and responsibilities as outlined in the Occupational Health and Safety Act and applicable regulations, but rather highlighting key points, and in some areas, improving upon the roles and responsibilities of various workplace parties in an effort to ensure that the ultimate goal of an injury and accident-free workplace is accomplished. Duncor is committed to a safe work environment and adhering to the Occupational Health and Safety Act and to any other applicable industry or safety regulations, codes and standards.

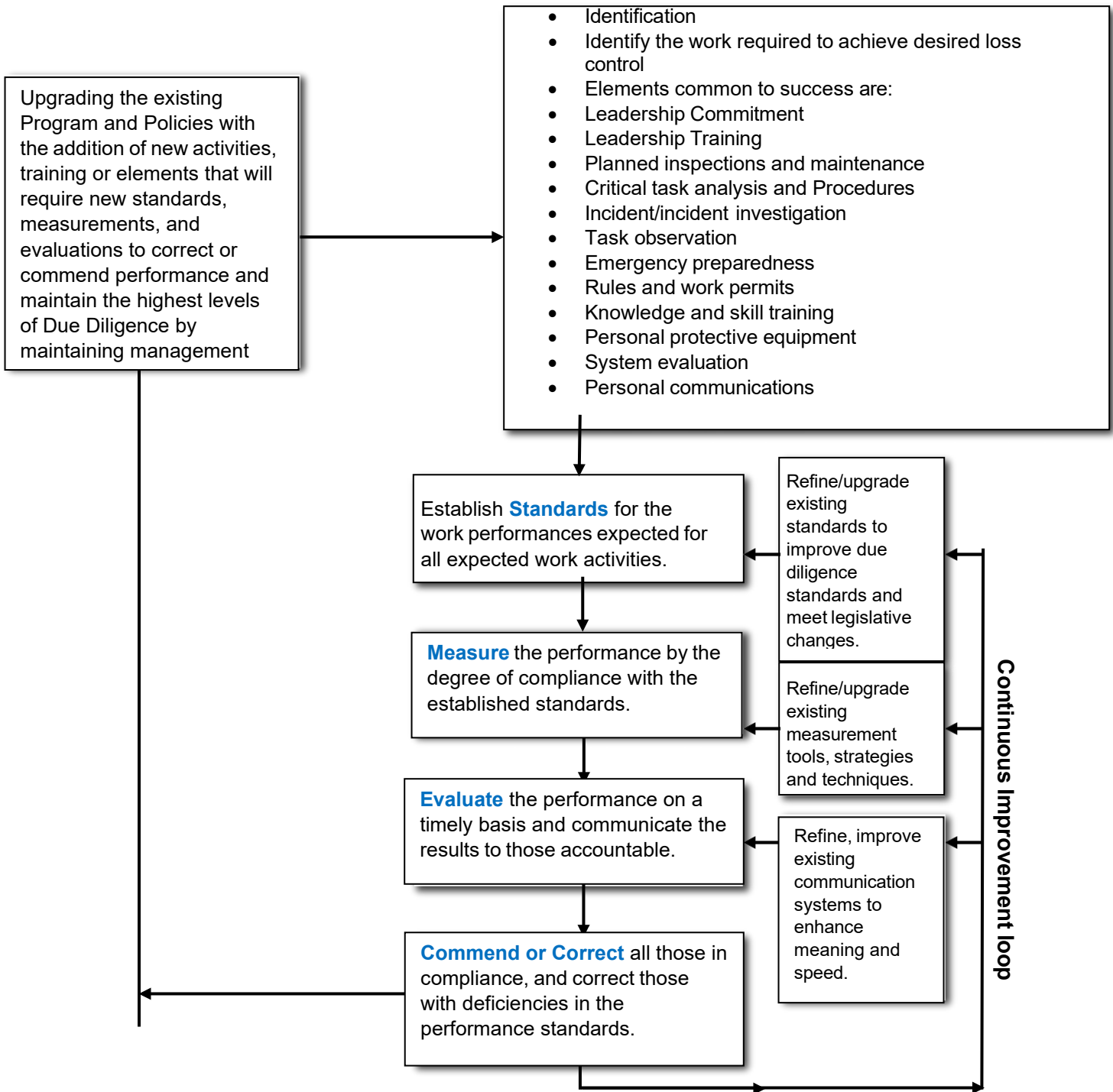
### SCOPE

This policy applies to Duncor management.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
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VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## FUNDAMENTALS OF DUE DILIGENCE





<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
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<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

**FUNDAMENTALS OF DUE DILIGENCE**

**IDENTIFICATION:**

Management Control Measures:

*14 Elements for Success*

KEY ELEMENTS		MANAGEMENT CONTROL THROUGH
1	<b>Leadership Commitment</b>	<ul style="list-style-type: none"> <li>• Dedication of time, funds and personnel towards ensuring the Safety Program is functioning in a manner that meets all Policy Expectation Statements.</li> <li>• Review of both the programs successes and failures on a continual basis.</li> <li>• Supporting the Continuous Improvement Program.</li> </ul>
2	<b>Leadership Training</b>	<ul style="list-style-type: none"> <li>• Dedication of time and energy by all management employees to attend all required safety related Training and Educational Programs.</li> <li>• Senior Management holding all employees accountable for attending required Training and Educational Programs.</li> </ul>
3	<b>Planned inspections (see Audits &amp; Inspections section)</b>	<ul style="list-style-type: none"> <li>• Dedication of time, funds and personnel to complete all planned inspections.</li> <li>• Ensuring those that are required to complete planned inspection do so as required, and in a timely manner.</li> <li>• Ensuring all substandard practices or conditions are resolved and completed in a priority sequence.</li> <li>• Ensuring Follow-up is completed.</li> </ul>
4	<b>Critical task analysis and Procedures</b>	<ul style="list-style-type: none"> <li>• Dedication of time and personnel to develop and implement Safe Work Practices / Safe Job Procedures identified through Critical Task Analysis.</li> <li>• Monitoring the work to ensure Control Measures are taken and are effective.</li> </ul>
5	<b>Incident/incident investigation</b>	<ul style="list-style-type: none"> <li>• Dedication of time, funds and personnel to properly and suitably investigate all incidents.</li> </ul>
6	<b>Accountability</b>	<ul style="list-style-type: none"> <li>• Holding all those accountable whom are in non-compliance with the Occupational Health &amp; Safety Act, related Regulations, and the Employer Safety Policy/Program requirements.</li> </ul>
7	<b>Task observation</b>	<ul style="list-style-type: none"> <li>• Dedication of time and personnel to properly and suitably observe Critical Tasks.</li> </ul>
8	<b>Emergency preparedness</b>	<ul style="list-style-type: none"> <li>• Dedication of time, funds and personnel to properly develop, implement and maintain usable site-specific Emergency Action Plans, and Emergency Response Plans.</li> <li>• Ensuring Contractors have the appropriate First Aid Training.</li> <li>• Dedication of funds for all required First Aid Equipment.</li> </ul>
9	<b>Rules and work permits</b>	<ul style="list-style-type: none"> <li>• Dedication of time, funds and personnel to develop, implement and maintain site specific Procedures, Rules and Work Permits.</li> <li>• Monitoring the documentation to ensure compliance with set standards.</li> </ul>
10	<b>Knowledge and skill training</b>	<ul style="list-style-type: none"> <li>• Ensuring all staff are competent as described in the Occupational Health &amp; Safety Act, and related Regulations.</li> <li>• Ensuring all Contractors/Subcontractors &amp; Service Providers and their employees are competent.</li> </ul>
11	<b>Personal protective equipment</b>	<ul style="list-style-type: none"> <li>• Ensuring all employees have or are provided with the necessary PPE, and competent workers are properly trained in the use of their PPE.</li> <li>• Dedication of time, funds and personnel to ensure all employees are properly trained, and when so required, provide training.</li> </ul>
12	<b>System evaluation</b>	<ul style="list-style-type: none"> <li>• Ensuring there are competent individuals in place to develop, implement and maintain an evaluation system based on statistical information, and historical events.</li> <li>• Ensuring Follow-up is done to support the Continuous Improvement Program.</li> </ul>



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
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<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

<b>13</b>	<b>Personal communications</b>	<ul style="list-style-type: none"> <li>Maintaining an open communication system for all employees/subcontractors &amp; Service Providers.</li> </ul>
<b>14</b>	<b>Group communications</b>	<ul style="list-style-type: none"> <li>Dedication of personnel and time to support the requirements and efforts of the Joint Health &amp; Safety Committees, and the Worker Trades Committees.</li> <li>Implementation and support of the Resolution Process.</li> </ul>

**ESTABLISHING STANDARDS:**

<b>KEY ELEMENTS</b>		<b>ESTABLISH STANDARDS THROUGH</b>
<b>1</b>	Policy Statements	<ul style="list-style-type: none"> <li>Defining the importance of Health, Safety, and Environment.</li> <li>Defining Senior Management commitment, and support to Safety, Health and the Environment.</li> <li>Defining the commitment of Senior Management for continuous improvement.</li> </ul>
<b>2</b>	Safety Program	<ul style="list-style-type: none"> <li>Defining the Companies Internal Responsibility System.</li> <li>Defining the Duties &amp; Responsibilities of all staff.</li> <li>Defining the Duties &amp; Responsibilities of all Contractors/Subcontractors &amp; Service Providers</li> <li>Defining Program Implementation.</li> <li>Defining Accountability, and Disciplinary Actions.</li> </ul>
<b>3</b>	The OHS Acts/Regs	<ul style="list-style-type: none"> <li>Ensuring all elements of the Safety Program meet or exceed the expectations/standards set out in the Occupational Health &amp; Safety Act and associated Regulations, and/or standard industry practices.</li> </ul>
<b>4</b>	Procedures	<ul style="list-style-type: none"> <li>The development of Procedures for all critical elements of the Safety Program (Emergency procedures, SWPs etc.).</li> </ul>
<b>5</b>	Training/Orientation	<ul style="list-style-type: none"> <li>Defining Competency expectations.</li> <li>Defining Required Training/Education of all staff.</li> </ul>

**MEASURING PERFORMANCE TO STANDARDS**

<b>KEY ELEMENTS</b>		<b>MEASURE PERFORMANCE THROUGH</b>
<b>1</b>	Management commitment	<ul style="list-style-type: none"> <li>Management's attendance and support in safety meetings.</li> <li>Management's attendance and support in audits &amp; inspections.</li> <li>Management's attendance and support in incident/incident investigations.</li> <li>Management's allocation of funds and competent persons to support the Safety Program.</li> </ul>
<b>2</b>	Duties & Responsibilities	<ul style="list-style-type: none"> <li>Submitted Documentation that supports compliance with defined Duties and Responsibilities.</li> </ul>
<b>3</b>	Audits/inspections	<ul style="list-style-type: none"> <li>Timely submission of completed Reports, Audits and Inspections by the required individuals.</li> </ul>
<b>4</b>	Knowledge and Skill Training	<ul style="list-style-type: none"> <li>Documentation (rosters, certificates) that supports the Safety Program requirement for continuous Training and Education.</li> </ul>
<b>5</b>	Project Documentation, work practices, and Procedures	<ul style="list-style-type: none"> <li>The compliance within the completed Audits and Inspections.</li> </ul>



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
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<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

**EVALUATION & COMMUNICATION OF PERFORMANCE**

<b>KEY ELEMENTS</b>		<b>PERFORMANCE EVALUATION</b>
<b>1</b>	Safety Program Evaluation	<ul style="list-style-type: none"><li>• 3<sup>rd</sup> Party audit/evaluation of the Safety Program, all submitted Documentation, and Project Performance.</li><li>• Reviewing the successes and failures of the Safety Program with Senior Management.</li><li>• Reviewing the successes and failures of the Safety Program with all Employees.</li></ul>

**Commend or Correct** those individuals in a timely manner based on both their immediate success or failure with standards, and long-term Safety Performance.



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<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## 1.10 DOCUMENT & RECORD CONTROL

### OVERVIEW

Legislative requirements indicate that certain documentation must be maintained on all construction projects for the duration of the project. It is important that a uniform filing system is established by Duncor to ensure that all legislative requirements are met, and that all required documentation is accessible and available. The Duncor documentation management system ensures that all documentation, legislated and otherwise are available to the site Supervisor / Foreperson and other relevant individuals at all times.

### PURPOSE

The purpose of this procedure is to detail the process for the creation, review, modification, maintenance and management of Health and Safety (H&S) documentation and to establish the recordkeeping requirements.

### SCOPE

This procedure applies to all Duncor projects.

### ROLES & RESPONSIBILITIES

#### Senior Management/Managers

- Ensure a uniform filing system is established and maintained on all Duncor projects.
- Ensure all Supervisors / Forepersons, workers, contractors, subcontractors and independent operators supply and collect the required documentation.
- Protect the confidentiality of documents and records by restricting the access of any documentation with private/confidential properties, as necessary.
- Review, approve, and/or provide feedback for the creation/revision of any HSMS documents.
- Review quality of any Subcontractor / Service Provider's forms prior to use. Subcontractors and service providers will be required to use Duncor form if their own forms fail to meet Duncor standards.

#### Health & Safety Coordinator

- Responsible and accountable for maintaining documents and records as part of the HSMS.
- Ensure maintenance, tracking and identification of relevant documents and records as part of the HSMS.
- Identify and compile all necessary internal and external documents relevant to project planning and/or review of Duncor's HSMS
- Develop documentation and recordkeeping requirements for the HSMS
- Create, modify, withdraw, and review documentation as necessary.
- Acquire approval from Management for revisions made to HSMS documents prior to issue.
- Consult with Senior Management when developing HSMS documents.
- Ensure produced documents follow this procedure.
- Remove/archive obsolete documents from circulation to prevent unintended use.
- Ensure relevant documentation remain in Duncor's system and ensure all irrelevant / obsolete documents and records are properly disposed of.
- Collect all documentation submissions from the Supervisor / Foreperson on, at minimum, a monthly basis.
- Ensure all Subcontractor documentation is approved prior to mobilization and commencement of work.
- Review quality of any Subcontractor / Service Provider's forms prior to use. Subcontractors and service providers will be required to use Duncor form if their own forms fail to meet Duncor standards.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
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<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

Supervisors / Forepersons

- Ensure all required documentation is submitted and/or collected from all Duncor employees and any contractors performing work on behalf of Duncor.
- Review all documentation / forms received from workers, subcontractors, and service providers (where applicable), to ensure legibility, completion and applicability of content prior to approval of submission.
- Collect and review forms on a daily / weekly basis.
- Ensure documents are legible, and readily available for all relevant parties.
- Ensure the site filing system is maintained, as required.
- Ensure sign-in forms are used accordingly.

Workers / Subcontractors

- Provide any, and all required documentation to the Duncor site Supervisor / Foreperson for filing and review. Forms are to be approved by Duncor management prior to implementation.
- Subcontractors to complete either Duncor or Subcontractor specific documentation (e.g., Hazard Assessment) and provide to the Duncor site Supervisor / Foreperson for filing and review. Note: Subcontractor forms to be approved by Duncor prior to implementation.
- Participate in development and review of forms by providing input to Supervisors / Forepersons and/or Senior Management that may assist in continuous improvement of the HSMS.

Service Providers

*(Service providers may include, but are not limited to: Surveyors, Mechanics, Engineers, Sanitary Facilities Maintenance Providers, Equipment Maintenance Providers, etc.)*

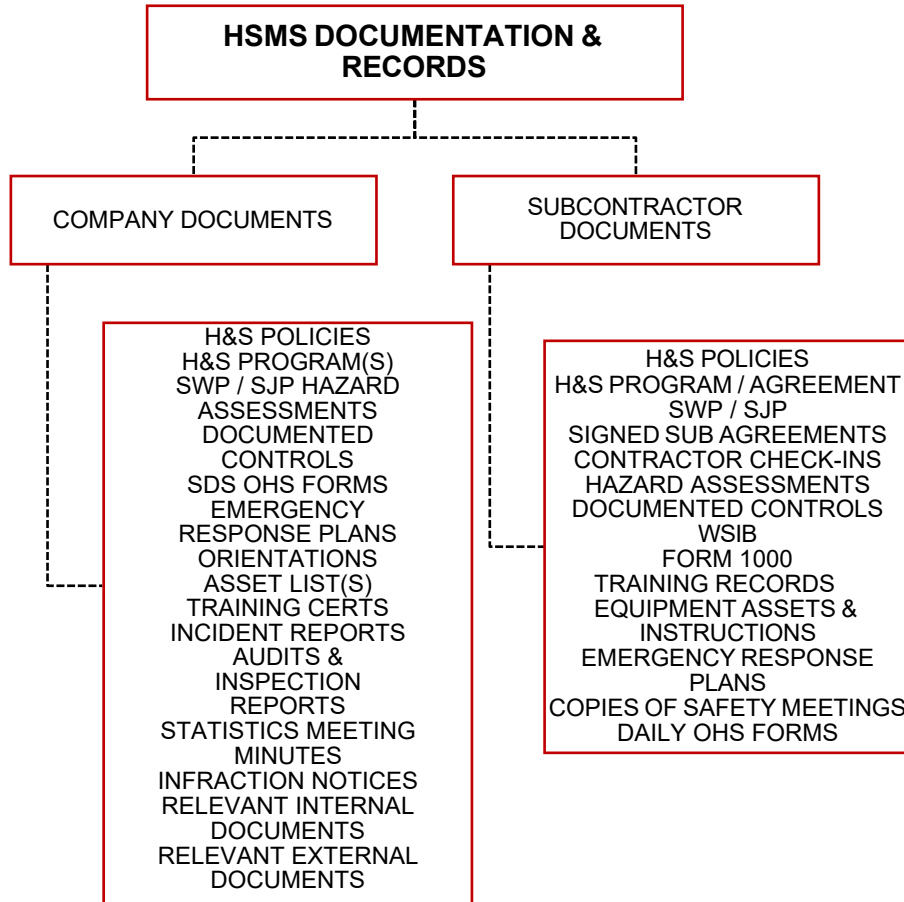
- Provide any, and all required documentation to the Duncor site Supervisors / Forepersons for filing and review. Forms are to be approved by Duncor management prior to implementation.
- Service Providers to complete either Duncor or Service Provider specific documentation (e.g., Hazard Assessment) and provide to the Duncor site Supervisor / Foreperson for filing and review. Note: Service Provider forms to be approved by Duncor prior to implementation.
- Submit all forms and documentation to Duncor Health & Safety Coordinator, and/or Supervisors / Forepersons for approval.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
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<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

**PROCEDURE:**

Senior Management in consultation with the Health and Safety Coordinator will determine the documents and records necessary for the effectiveness of the HSMS during the annual review. The following are documents and records determined to be necessary for the effectiveness of Duncor’s HSMS.



Documents vs. Records	
<p align="center"><b>Controlled Documents</b></p> <ul style="list-style-type: none"> <li>• Are revisable under formal review and approval.</li> <li>• Are typically distributed on a scheduled basis.</li> <li>• Usually provide a document status to reflect approval and use limitations.</li> </ul>	<p align="center"><b>Records</b></p> <ul style="list-style-type: none"> <li>• Are static documents and cannot be revised.</li> <li>• Has a secured index and storage location.</li> <li>• Can only be corrected in accordance with approved process.</li> </ul>

Approval Process for Development of Controlled Documents

1. The Health & Safety Coordinator is responsible for the creation or procurement of necessary material relevant to the effectiveness of the HSMS. Document development may be initiated by Senior Management or the Health & Safety Coordinator. Possible reasons for creating new documents include:
  - Changes in legislative requirements
  - System failure identified
  - Internal or external evaluation findings
  - Outcome of system reviews
  - Recommendations from employees
  - Change of business activities or structure



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<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

- Change to reflect new industry best practice initiatives
2. The document(s) shall be submitted to Senior Management and Supervisors / Worker H&S Reps / JHSC for review.
  3. All revisions and modifications are to be documented from all parties. If no additional input is required, the Health & Safety Coordinator now has the approval to draft the final copy for distribution and implementation.
  4. Senior Management will ensure that implementation of new documents are communicated to relevant work parties via memos posted on safety boards, toolbox talks, and H&S meetings.
  5. In the event additional training is required to familiarize workers with new documentation, Senior Management will schedule the required training. Training will be provided by the Health & Safety Coordinator.

#### Approval Process for Modifying, Revising or Withdrawing Controlled Documents

Senior Management, Managers / Health & Safety Coordinator shall work in consultation to ensure compliance with the company's HSMS and legislative requirements. All controlled documents within the HSMS are subject to review, at minimum, annually during the Senior Management Review meeting.

#### **Modifications and Revisions**

1. Modifications and revisions may be initiated by Senior Management, other management members, and/or Supervisors / Forepersons and/or after a system failure is recognized.
2. The document requiring modifications / revisions shall have (1) Meeting Minutes attached or (2) notes addressing the modifications or revisions required.
3. Review
  - a. If Senior Management initiated the review, it is required to be submitted to Supervisors, Worker Health & Safety Rep., and JHSC (if available) for review and input.
  - b. If it is a modification / revision initiated by any person(s) other than Senior Management, the modification / revision shall be submitted to Senior Management for review.
4. All revisions and modifications are to be documented from both parties. Once the final approval is received from both parties, the Health & Safety Coordinator will be responsible for creating and distributing the approved version.

#### **Withdrawals**

1. Withdrawals of any controlled document will occur as frequently as necessary and are required to go through the approval process.
  - a. Withdrawals may occur when information becomes obsolete,
  - b. When a system failure is identified,
  - c. Is no longer relevant to the scope of work,
  - d. Or when a new system is being introduced.
2. Senior Management is required to review annually, all elements within the HSMS and shall determine the effectiveness of each component.
3. Should Management move forward with withdrawing any documentation, access to the document(s) shall be restricted and the process change shall be communicated to all relevant workplace parties in a timely manner.
4. Policies, practices, and procedures must be reviewed and reapproved on an annual basis.

#### Document Identification and Tracking

The Health & Safety Coordinator is responsible for maintaining the master HSMS document registry to ensure changes to, and current revision status of documents are identified and tracked. The document registry will include the following information:



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EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

- Company Name
- Company Logo
- Document Name
- Document Owner (Senior Management’s Name)
- Date Reviewed (when the document was reviewed for final approval)
- Date Effective (when the document comes into effect)
- Version Number (to follow the following format: (Document Acronym) (Current Year) (Revision#) **HSMSYYYY.##**)
- Supersedes (version of the Manual the most current manual supersedes)

All revisions or modifications will be documented and will be tracked and logged in the “REVISIONS LOG”, which can be found in the beginning of each element section throughout this manual. The revisions logs will capture:

1. The revision number (e.g., YYYY.1, YYYY.2, YYYY.3, ...)
2. The name of the person who made the revision / modification / withdrawal
3. The date of which the revision / modification / withdrawal was made
4. The name of the Senior Management Member and relevant parties who approved the revision / modification / withdrawal upon review
5. The description of the revision / modification / withdrawal made (e.g., “included x, y, z...”, “withdrew x, y, z...”)

Availability

Senior Management / Management is responsible for the timely distribution of relevant versions of documentation after approval. Once they have been received, Supervisors / Forepersons shall ensure that all relevant versions of documents are readily available to workers at the point of use.

**Paper Documentation** – Shall be made readily available in a conspicuous location or in the H&S Communication binder. The Supervisor / Foreperson / Health & Safety Supervisor shall ensure multiple copies of each document are made available to workers, visitors, subcontractors, if required, and service providers ensure its use.

**Electronic Documentation Platform** – In the case where Duncor uses an electronic platform to complete the documentation, Senior Management and the Health & Safety Coordinator shall ensure that irrelevant documents are removed from the platform and saved in the company server for recordkeeping. All irrelevant documents are to be replaced with relevant versions on the same day of which they are removed to prevent disruption in the completion of paperwork.

Senior Management shall assign a management employee to have administrative access to ensure all elements relevant to the HSMS are not tampered with. All Duncor employees will have limited, but relevant, access to the electronic platform to ensure that all appropriate documentation is available to them.

External Documents

Duncor Management is required to identify documents of external origin that may be necessary for the planning and operation of the HSMS. External documents may include, but are not limited to:



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VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

- Current versions of the Occupational Health & Safety Act
- Legislative Postings
  - o WSIB (Form-82)
  - o Employment Standards Act
  - o Prevention Starts Here
  - o Environmental / Air Quality Assessments
  - o Notice of Project
  - o MOL / MOE / MTO Orders of Compliance
  - o Owner’s Manuals of Equipment / Tools / Machinery / Specialized PPE
- General Contractor / Subcontractor Hazard Assessments
- Subcontractor training verification
- P. Eng. drawings and reports
- Equipment rental company maintenance schedules

These documents may be filed on site and/or at Head Office to ensure availability of relevant documents to workplace parties at any given time.

Obsolete Documents

All obsolete documents shall be watermarked “OBSOLETE” to prevent unintended future use, should they be retained for any purpose.

Protecting Confidentiality

Duncor is required to protect the privacy and confidentiality of documents, records and its employees, as appropriate. Documents or records containing personal information shall be kept in a secure location and shall be managed only by Senior Management and/or the designate. A secure location may include, but is not limited to:

- Company Server requiring the administrator’s password
- Filing cabinets with key entry
- Ensuring computer screens / files are not left unattended
- Limiting access of confidential information to relevant parties only

Record Retention and Disposal

All records produced shall be retained using the Safety Document & Record Control System, at minimum, for (3) years and for the duration of the project to demonstrate conformity to the requirements of our HSMS.

The Health & Safety Coordinator is required to ensure all documents and records are maintained in a manner that ensures legibility, ease-of-identification, and conformity with our HSMS. Documents and records will be filed by project name in alphabetical order in a standardized method leveraging our safety document and record control system. Document templates are designed for type written and signed off either handwritten or electronically to ensure a high degree of conformity and legibility.

Supervisors are responsible for ensuring that all documentation are collected, at least weekly, from employees, subcontractors, visitors, and/or service providers and are fully completed and legible. The Health & Safety Coordinator will be responsible for collecting all reviewed documentation, at least weekly, from each Site Supervisors to ensure all relevant documents and records are maintained.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
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<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

Paper documentation will be reviewed and stored into a filing cabinet, as well as scanned and saved as PDFs to the password protected Duncor server by the Health & Safety Coordinator. Electronic documents will be saved as PDFs to the password protected server.

Duncor requires all documentation deemed obsolete / irrelevant to the HSMS to be purged after (3) years after the end of the project. Hard copies of confidential documents requiring disposal must be done so in a secure manner. If access to this type of service is unavailable, Duncor Management shall ensure that these documents are shredded prior to disposal. Cloud based documents and records shall remain password protected and will be archived.

## **TRAINING**

All Duncor Supervisors / Forepersons and management are to receive training in the use and maintenance of the Safety Document & Record Control System.

## **COMMUNICATION**

Any, and all changes pertaining to issuance of new documentation are to be communicated to affected parties as soon as possible through company memos posted on the safety board, toolbox talks and/or H&S meetings.

## **EVALUATION**

The successes and shortfalls of this procedure are to be evaluated by management on an annual basis, and changes are to be implemented where required.

## **APPLICABLE LEGISLATION**

- Occupational Health and Safety Act R.S.O. 1990
- Ontario Regulations for Construction Projects, O. Reg. 213/91



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SUPERSEDES	HSMS2025.1

## 1.11 DIGITAL PLATFORM

To ensure legibility, recordkeeping, and completion, Duncor has implemented the use of SafetyLoop, an electronic platform used to complete safety forms. Roles and Responsibilities are assigned to ensure smooth functioning of the electronic platform.

### AUTHORITIES & RESPONSIBILITIES

#### SENIOR MANAGEMENT & HEALTH & SAFETY COORDINATOR

- Choose and review the platform to be used.
- Ensure safety tablets are available to complete safety documentation. In cases where tablets are not available, ensure relevant parties required to complete forms are provided with access to the platform.
- Ensure relevant workplace parties have downloaded the appropriate application, “app”, onto the chosen device.
- Provide training on the use of the platform.
- Review and make changes as required.
- Respond to worker feedback.
- Ensure obsolete forms are removed from the system. Access to these forms must be restricted from future use.
- Ensure confidential documents are accessible only to relevant individuals.

#### SUPERVISORS / FOREPERSONS

- Ensure that documents are completed.
- Communicate input and feedback from workers to Senior Management.
- Train workers in the use of the platform.
- Complete pertinent documentation for visitors and subcontractors (e.g., site-specific orientations).

#### WORKERS

- Complete required forms on the platform.
- If the platform becomes unavailable for any reason, a paper copy of the document must be completed prior to commencing work.
- Identify and report any issues with the platform to your Supervisor, the Health & Safety Coordinator, or Senior Management.
- Provide input and feedback for corrective action where applicable to your Supervisor, the Health & Safety Coordinator, or Senior Management.

#### SUBCONTRACTORS / SERVICE PROVIDERS / VISITORS / CLIENTS / PUBLIC

- Duncor will provide paper documentation to applicable parties.
- Access to the safety platform will not be granted to any persons other than Duncor employees, or to those permitted to access the platform.

### PROCEDURE

Before any employees use the SafetyLoop system, Health & Safety must ensure that all relevant information is inputted into the system. This is a foundational aspect of the platform. Health & Safety will set up the following:

1. All tasks must be inputted into the system to ensure consistency when tasks are selected.
2. Ensure information is derived from the Company Hazard Assessment (HIRA). At the very least, it should include:
  - a. Tasks
  - b. Hazards



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

- c. Initial Risk Rating
  - d. Controls
  - e. Residual Risk Rating
  - f. PPE Required
  - g. Potential Emergency Situations
3. Ensure all company assets have specific forms.
  4. Ensure all relevant parties have access to the platform. For security, Health & Safety will ensure that no other person has access to modifying foundational information.

### **CREATING FORMS**

1. Health & Safety will be responsible for ensuring all forms relevant to and required by the OHSMS and other regulating bodies are readily available as an electronic document.
2. Health & Safety must ensure that each document is correctly titled. Workers must be able to determine if the document is for site, office, and shop / yard.
3. Health & Safety will ensure only current documents are in circulation. Obsolete forms may be locked out to prevent unintended use by workplace parties.
4. Health & Safety will manage documents as required, allowing Health & Safety to:
  - a. Manage access and restrictions
  - b. Activate and deactivate forms
  - c. Edit templates
  - d. View inspections
  - e. Schedule

### **TRAINING & COMMUNICATION**

1. An organization-wide training session will take place, educating workers in the purpose and use of SafetyLoop.
2. Relevant workplace parties will be made aware of the forms they are required to complete.
3. During this meeting, Management and Health & Safety will address any input and/or feedback from workers.
4. Relevant parties will be provided with access to SafetyLoop.

### **ENSURING COMPLETION**

1. The Supervisor will be responsible for ensuring that workers required to complete forms are completing them as frequently as required and completely.
2. A supervisor must also ensure that all forms are signed-off, saved, and marked as complete.
3. Health & Safety will informally review all forms to verify that they are being completed.
4. Health & Safety will review, at least twice a year, the operating system of SafetyLoop.
5. Changes will be made as necessary.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
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VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 1.12 EMPLOYEE HAZARD REPORTING & THE RESOLUTION PROCESS

### PURPOSE

The purpose of this procedure is to ensure that employees have the opportunity to report any hazards or areas of concern to management in writing without pressure and remain anonymous if desired.

### SCOPE

This procedure applies to all Duncor employees and subcontractors.

### ROLES & RESPONSIBILITIES

#### Management / Supervisors / Forepersons

- Investigate any, and all reported hazards or areas of concern in a timely manner.
- Ensure corrective actions are applied to any hazards or areas of concern as soon as possible.
- If corrective actions are not required, provide a reason in writing as to why they are not required to be submitted to the employee and JHSC.
- Ensure workers are not punished or intimidated when reporting any hazards or concerns.

#### Joint Health & Safety Committee

- Participate in the investigation of hazards reported, where requested.
- Provide recommendations to management regarding the correction of identified hazards.
- Follow-up and ensure corrective actions have been implemented or reasons as to why they cannot be completed have been provided to the JHSC in writing.

#### Workers

- Identify and report any incidents, injuries or hazards to your Supervisor / Foreperson or management as soon as possible.
- Provide suggestions for corrective action, where possible.
- Assist in the implementation of corrective actions where required or where possible.

### PROCEDURE

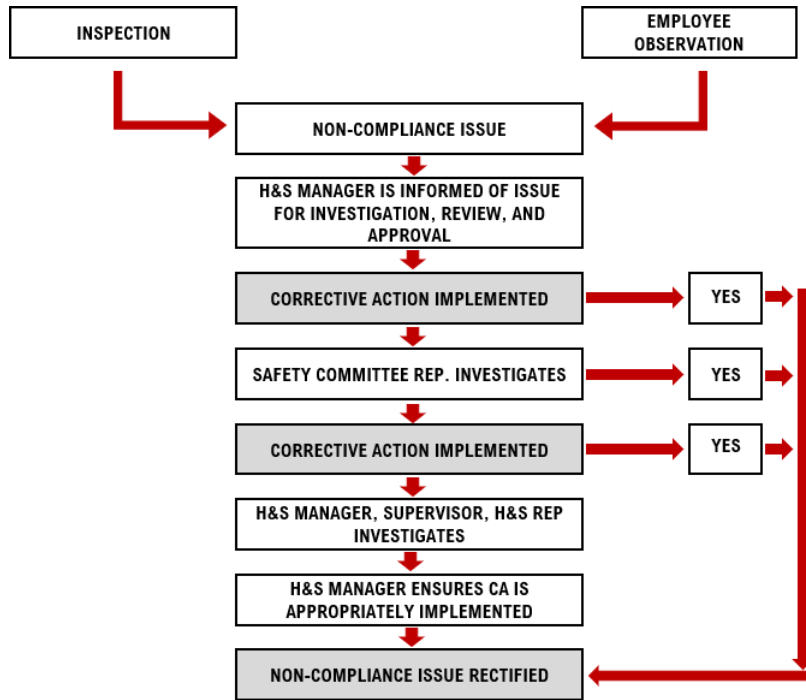
- Any employee discovering a non-compliance issue must immediately inform their Supervisor / Foreperson.
- If a worker does not wish to identify himself when reporting a hazard, the worker may complete a written notice and remain anonymous.
- If the non-compliance issue cannot be resolved, the employee or Supervisor / Foreperson will request assistance from the health and safety representative and/or the trade representative (if applicable). If resolved, the issue is considered finished.
- If the non-compliance is not resolved, the employee, Supervisor / Foreperson, or health and safety representative will request assistance from site safety professional, or Duncor safety Manager as applicable.
- Once the safety health and environment committee or site safety professionals are involved, they will investigate the non-compliance. If the non-compliance is still not resolved, they will inform site executive management team.
- Non-compliance issues will be placed on the agenda of the JHSC committee meeting and will be identified for corrective action.
- Site management has the responsibility to respond to the JHSC with recommendations, in writing. The response should include an implementation timetable, or reason why the recommendation cannot be acted upon.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
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VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

- Once corrective action has been taken, the person who originally discovered the non-compliance must confirm that the corrective action taken was effective before the non-compliance can be formally closed out.

### RESOLUTION PROCESS



### TRAINING

All Duncor Supervisors / Forepersons and management are to receive Basics of Supervisor training to assist in the identification of hazards. All workers are to be trained on this procedure upon Duncor orientation.

### COMMUNICATION

Any, and all corrective actions required to correct a hazard are to be communicated to applicable workers as soon as possible.

### RECORDKEEPING

A record of all reported hazards and corrective actions are to be maintained on file by Duncor management. All records and documents are required to be kept and maintained as per Duncor’s Safety Document & Record Control System as per Element 1.7 of this manual.

### EVALUATION

The successes and shortfalls of this procedure are to be evaluated by management on an annual basis and changes are to be implemented where required.

### APPLICABLE LEGISLATION

- Occupational Health and Safety Act R.S.O. 1990
- Ontario Regulations for Construction Projects, O. Reg. 213/91



**DUNCOR**  
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<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
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<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## **COMPANY STATEMENT OF THE ENVIRONMENT, HEALTH & SAFETY POLICY MANUAL**

None of the procedures, policies, or benefits in this manual is intended by reason of their publication to confer any rights or privileges upon you, or to entitle you to be or remain employed by Duncor. This handbook has been prepared to acquaint you with the policies, procedures, and health and safety regulations which apply to employees of Duncor. Duncor will make every effort to ensure that policies, procedures, health and safety regulations are administered in a fair and impartial manner, which is also addressed through the harassment policy.

This manual is intended to be a guide and practical source of information for all employees and they are responsible for the information contained herein.

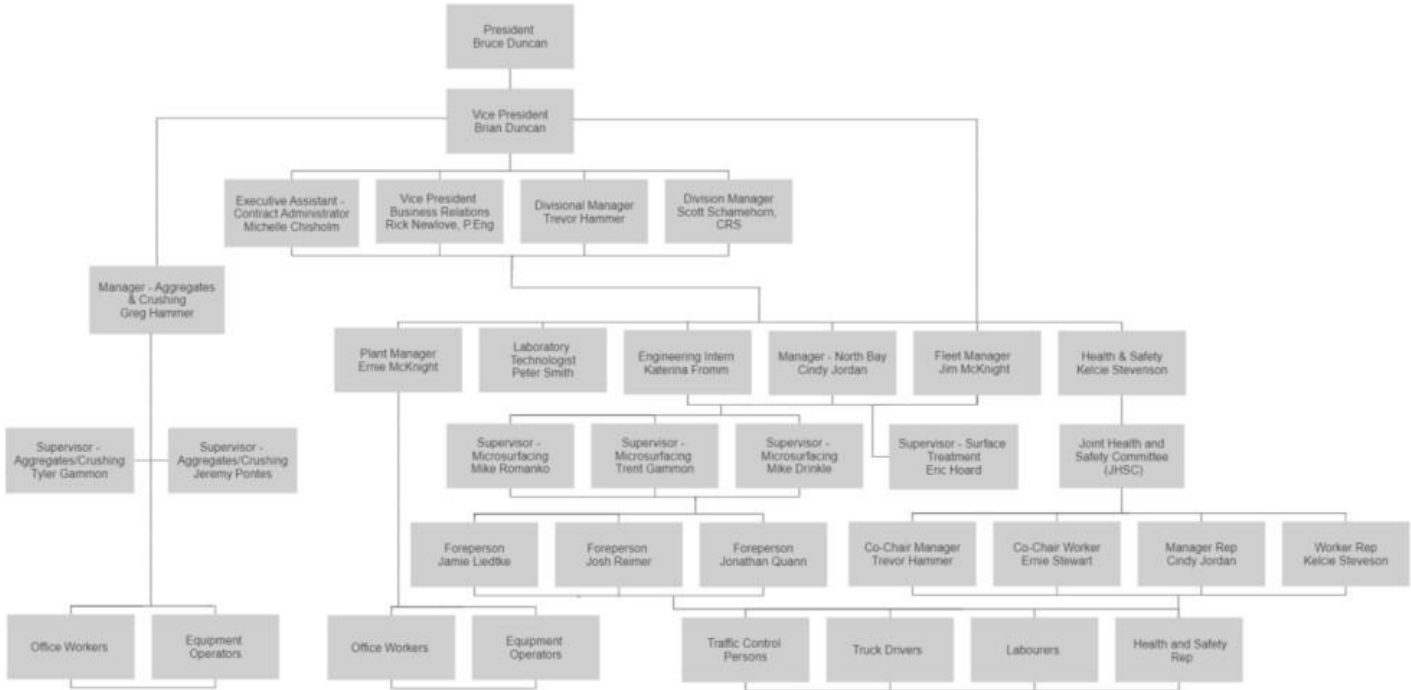
### **POLICY CHANGES**

The policies and procedures contained in this handbook are subject to change at any time, with or without notice or coordination with our employees, for reasons ranging from management re-evaluation to judicial interpretation and for new federal or provincial laws. The company reserves the right to revise the policies and procedures at any time and to make exceptions regarding the policies in certain circumstances if it is deemed in the company's best interest. When revised, new information will be communicated to all employees by e-mail or memo in a timely fashion.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
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VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## ORGANIZATIONAL CHART





<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## ELEMENT 2: HAZARD ASSESSMENTS & CONTROLS

REVISION LOG				
YEAR.REV #	REVISED BY	DATE REVISED	APPROVED BY	DESCRIPTION OF CHANGES
2021.1	J. LASTNAME	MM.DD.YYYY	MR. PRESIDENT	<ul style="list-style-type: none"> <li>X</li> <li>Y</li> <li>Z</li> </ul>
2022.1	KELCIE STEVENSON	01.2022	BRIAN DUNCAN	<ul style="list-style-type: none"> <li>HSMS2022.1 SUPERSEDED BY HSMS2023.1</li> </ul>
2023.1	KELCIE STEVENSON	01.25.2023	BRIAN DUNCAN	<p>Included:</p> <ul style="list-style-type: none"> <li>Roles and Responsibilities for all relevant workplace parties</li> <li>Hazard and Risk Assessments Policy Statements</li> <li>Hazard assessment schedule chart</li> <li>Factors to include when conducting hazard assessments chart</li> <li>Hazard assessment flow chart</li> </ul> <p>Modified:</p> <ul style="list-style-type: none"> <li>PSP is now in its own section along with R&amp;R</li> <li>JHA is now in its own section along with R&amp;R</li> <li>CTRA is now in its own section along with R&amp;R</li> </ul> <p>Withdrew:</p> <ul style="list-style-type: none"> <li>HSMS2022.1 procedure</li> </ul>
2024.1	KELCIE STEVENSON	01.24.2024	BRIAN DUNCAN	<p>Modified:</p> <ul style="list-style-type: none"> <li>Requirement to conduct risk assessments</li> <li>Involvement of competent workplace parties in hazard assessment process</li> <li>Review of hazard assessment</li> <li>Consideration of legal requirements, design and layout of work area, ergonomics, machinery, and processes</li> </ul> <p>Withdrew:</p> <ul style="list-style-type: none"> <li>HSMS2023.1 procedure</li> </ul>
2025.1	KELCE STEVENSON	01.22.2025	BRIAN DUNCAN	<p>Modified:</p> <ul style="list-style-type: none"> <li>Project Safety Plan and Emergency Response Plan blended to create Project Specific Emergency Response Plan</li> </ul> <p>Withdrew:</p> <ul style="list-style-type: none"> <li>HSMS2024.1 procedure</li> </ul>
2026.1	KELCIE STEVENSON	01.21.2026	BRIAN DUNCAN	<p>Modified:</p> <ul style="list-style-type: none"> <li>Revised "identification" to policy and program title to align with the rest of the manual</li> <li>"legal requirements and associated standards and guidelines" to table</li> <li>2.2 Included "safety" to flow chart section #2</li> </ul> <p>Withdrew:</p> <ul style="list-style-type: none"> <li>HSMS2025.1 procedure</li> </ul>



**DUNCOR**  
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<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## 2.1 HAZARD IDENTIFICATION AND RISK ASSESSMENTS POLICY STATEMENT

Duncor Senior Management believes that an integral part of a successful HSMS is an effective system of identifying and controlling hazards. In efforts to ensure workplace safety, all personnel are required to participate in hazard assessments, analyses, and control implementation.

As a part of Senior Management's commitment to provide workers with a safe and healthy work environment, it is required that all relevant workplace parties assist Duncor in identifying and understanding any hazards and dangers associated with the tasks they are expected to perform during their daily work. It will also identify the necessary safety controls to be used for the protection of all workers.

Duncor will ensure the involvement of appropriate competent workplace parties such as workers, Supervisors / Forepersons, maintenance, engineering and suppliers in the hazard assessment process. These workplace parties shall make aware and train personnel of actual or potential risks and controls associated with each hazard.

The following procedures, as well as any legislation and other legal requirements shall be adhered to. Non-compliance of this policy may result in disciplinary action.

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**Brian Duncan, Vice President**  
January 23, 2026



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 2.2 HAZARD IDENTIFICATION AND RISK ASSESSMENTS

### OVERVIEW

There is an inherent risk associated with all job tasks performed within the scope of work on a construction site. By identifying and ranking the hazards associated with each job task prior to the start of work, we are able to target the tasks in which further controls are required to reduce or eliminate the hazards associated.

These hazards are to be documented in the Hazard & Risk Assessment document(s), which shall be referred to as “HRA”, which is a list that documents all tasks performed by Duncor. This chart provides an overview of:

1. The hazards associated with the scope of work.
2. Potential injuries that may be sustained while performing the task.
3. Risk rating prior to implementation of controls.
4. Relevant documentation (practices and procedures) relevant to the task.
5. Required controls.
6. Residual risk rating after controls have been implemented.
7. PPE required to perform the task.
8. Roles relevant to the task.
9. Potential emergency situations that may arise.

### PURPOSE

The purpose of this procedure is to rank the hazard level associated with each work task in order to identify high risk hazards that require further planning.

### SCOPE

A hazard assessment is required for all Duncor occupations and their associated tasks, and all operations and workplaces owned or controlled by Duncor. The requirement for identification of hazards encompasses those that will be occurring in the workplace, as well as those which originate outside of the workplace that may impact the overall health and safety of Duncor employees and the environment.

### ROLES & RESPONSIBILITIES

#### Senior Management

- Ensure all relevant parties conducting the hazard assessment have relevant competencies.
- Ensure Hazard Assessments are completed and reviewed annually and ensure consideration of legal requirements, associated standards and guidelines, and industry best practice.
- Ensure all relevant workplace parties are aware of their responsibility to report any existing and potential hazards in the workplace.

#### Health & Safety Coordinator

- Complete the Hazard and Risk Assessment(s) for all tasks expected to be completed by Duncor prior to the start of work.
- Ensure development of a Critical Task Risk Assessment.
- Review subcontractor Hazard and Risk Assessment submissions.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
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<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

- Review Hazard and Risk Assessment(s) and CTRA with supervisory staff.
- Ensure the HRA inventory is up-to-date and reflects the activities of the organization.
- Ensure all details listed within the HRA inventory are current. Reference items, such as practices, procedures, and emergency response plans, shall be listed as they are formally titled.
- Review the HRA inventory, at minimum, on an annual basis.
- Revisions shall be made at least annually, after incident investigations and/or after new work activities are introduced.
- Ensure Supervisors are made aware of the revisions to ensure they are qualified to train workers.
- Ensure all relevant workplace parties are aware of their responsibility to report any existing and potential hazards in the workplace.
- Ensure participation of all relevant workplace parties (Management, Supervisors, Workers, Engineers, Maintenance, etc.) in creation of the hazard assessment, where applicable.
- Successful completion of an Introduction to Hazard Identification and Risk Management course.

Supervisors / Forepersons

- Is competent in hazard identification and risk assessments through training conducted by the Health & Safety Coordinator.
- Assist the Health & Safety Coordinator in the identification of work tasks, associated hazards and required controls.
- Be aware of the risks pertaining to the work being performed by other service providers and communicate it to workers in a timely manner.
- Review the Hazard Assessment and ensure the controls are implemented in site level.
- Train all workers involved in the identified work tasks on the hazards and controls and ensure they understand.
- Required to report actual or potential hazards that are identified in the workplace to Senior Management / Manager(s) and or other Trade Supervisors.
- Participate / provide input during this process.

Worker

- Ensure an understanding of your roles and responsibilities pertaining to the Hazard Assessment.
- Be aware of and understand all risks pertaining to the work being performed and the risks associated with the work being performed by other trades.
- Understand and implement all control measures associated with the work task.
- Required to report actual or potential hazards that are identified in the workplace to the Supervisor / Foreperson.
- Participate / provide input during this process.

Service Providers / Subcontractors

- Ensure, where required, to conduct a Hazard Assessment.
- Be aware of and understand all risks pertaining to the work being performed and the risks associated with the work being performed by other trades / Duncor.
- Ensure to implement required controls to eliminate actual or potential hazards associated with tasks being performed.
- Required to report actual or potential hazards that are identified in the workplace to a Duncor Supervisor.



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VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

Visitors

- Visitors will not be required to conduct hazard assessments. However, visitors will be made aware of all existing and potential hazards within the workplace at the time of orientation at site.
- Required to report actual or potential hazards that are identified in the workplace to a Duncor Supervisor.

**PROCEDURE**

A hazard assessment is required to be completed for all operations, occupation, trade and task that is occurring on all Duncor operated workplaces. All relevant workplace parties are required to report any existing or potential hazards to their Supervisor / Foreperson during this time. To successfully complete a thorough hazard assessment, the involvement of appropriate workplace parties, which include but is not limited to; workers, Supervisors / Forepersons, maintenance and engineering professionals, and suppliers are required.

It is required for each identified task to be ranked according to potential consequences and probability of occurrence, and then given a risk rating before and after identifying controls using Duncor’s standardized risk rating system. The rating will then be converted to a HIGH, MEDIUM, or LOW risk hazard in order to identify whether further actions are required to control the risk associated with the work process.

Tasks that are identified as a HIGH hazard will require a Safe Work Procedure, identifying the steps and control measures that will be taken to reduce or eliminate the risk present.

Risk assessments will be, reviewed or updated for identified hazards following Element 14.2.2 Management of Change procedure including, but not limited to:

- Proactively prior to commencement of tasks
- When equipment, material, substance or process is introduced or changed
- When a change to the OHSMS may impact workplace operations or activities.
- After investigations (Investigators will have Incident Investigation Training as required by *Element 8.1.2 Training*)
- When the phase of project changes
- At a minimum annually

Must be completed prior to commencement of work tasks, and on an ongoing basis when equipment, material, substance, or process is introduced or changed and when a change to the OHSMS may impact workplace operations or activities.

Hazard and risk assessments shall be conducted for all operations including routine and non-routine, and human factors where work is performed. Risk assessments are broken into three levels: (1) Company Hazard & Risk Assessment, (2) Project Specific Emergency Response Plans, and (3) Job Hazard Analysis. All shall be conducted and reviewed/updated as often as:

Frequency	Hazard & Risk Assessment & Type	Workplaces Where Required
Annually	<ul style="list-style-type: none"> <li>• Review and update <u>Hazard Assessments</u></li> <li>• Review and update <u>Project Specific Emergency Response Plans</u> <ul style="list-style-type: none"> <li>○ Ensure legal requirements and associated standards and guidelines are correctly listed.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Head office</li> <li>• All sites</li> </ul>
Daily	<ul style="list-style-type: none"> <li>• <u>Job Hazard Analysis</u> – Completed proactively prior to the commencement of tasks</li> </ul>	<ul style="list-style-type: none"> <li>• All Sites</li> </ul>



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
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<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

As necessary	<p><u>JHAs / PSERP / HRA</u></p> <ul style="list-style-type: none"> <li>When equipment, material, substance or process is introduced, changed, or fails</li> <li>When a change to the HSMS may impact workplace operations or activities</li> <li>After incident investigations</li> <li>Phase of project changes</li> </ul>	<ul style="list-style-type: none"> <li>JHAs are required on all sites</li> <li>Project Specific Emergency Response Plans are required on all sites</li> <li>HRA is required at head office and on all sites.</li> </ul>
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Hazard assessments are required to be performed with applicable workers on the jobsite including Management, Supervisors, Workers, and Subcontractors prior to commencement of tasks. If a new hazard is introduced or identified the Site Supervisor will stop work and implement controls measures. All workers will be made aware of the new hazards and the controls measures will be communicated. All individuals will sign the JHA demonstrating that all hazards have been discussed and workplace parties are aware of how to control them.

The Health and Safety Coordinator with Senior Management, Supervisors, JHSC will review existing hazard assessments, analyze hazards, and develop or improve control measures (SWP, SJP). This is accomplished through monthly management meetings, quarterly JHSC meetings, and the annual management review and will consider:

- Legal requirements and guidelines by reviewing provincial health and safety organizations such as IHSA, MOL, member associations (BCA) and conducting research to stay up-to-date with industry best practices and standards
- Identification of hazards originating outside of the workplace that may impact OHS within the workplace for which the organization has control by consulting with relevant internal and external workplace parties (subcontractors, manufacturer's, suppliers) to develop or improve existing controls.

Any changes as a result of the review will follow Element 14.4 Management of Change procedure.

When completing, reviewing, or revising hazard assessment the following chart below will be considered by the Health and Safety Coordinator, Management, Supervisors and the JHSC:

<b>Factors To Include When Conducting Hazard Assessments</b>	
<i>Where applicable, the factors listed below must be considered when conducting hazard assessments</i>	
Consideration of all tasks to be performed	<ul style="list-style-type: none"> <li>Consider all tasks involved in completing one task</li> </ul>
Legal Requirements and associated Standards and Guidelines	<ul style="list-style-type: none"> <li>Include any controls as per legislation, associated standards and guidelines in the hazard assessment. This could include meeting legislated inspection frequencies, following manufacturer specs, or industry best practices:               <ul style="list-style-type: none"> <li>○ CSA Standard</li> <li>○ Occupational Health and Safety Act</li> <li>○ Manufacturer Specifications</li> <li>○ P.Eng. Specifications</li> </ul> </li> </ul>
Consideration of tools, equipment, and machinery processes	<ul style="list-style-type: none"> <li>List all tools, equipment and machines to be used for the task</li> <li>Pre-use inspections are part of conducting a hazard assessment</li> <li>Consider conducting a new hazard and risk assessment when new tools, equipment and machinery processes are introduced.</li> </ul>
Consideration of the design and layout of the work area	<ul style="list-style-type: none"> <li>Inspect access / egress routes, and ensure they are free of obstructions</li> <li>Inspect the ground conditions (icy, loose dirt, uneven, etc.)</li> </ul>



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<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

Consideration of ergonomics	<ul style="list-style-type: none"> <li>• Consider how much manual material handling is involved</li> <li>• Consider conditions of the walking surface when manually transporting material</li> <li>• Consider proper lifting techniques</li> </ul>
Human Factors	<ul style="list-style-type: none"> <li>• Determine if all employees are fit for duty via Job Hazard Analysis checklist executed by the Supervisor / Foreperson.</li> <li>• Consider levels of stress and lack of rest</li> <li>• Determine if workers are adequately trained in completing the task as required (e.g., WAH, WHMIS, etc.)</li> <li>• Consider any pre-existing conditions that may affect the worker's ability to successfully complete a task without getting injured or ill</li> </ul>
Routine Factors	<ul style="list-style-type: none"> <li>• Consider working with other trades on site</li> <li>• Consider legal requirements and other standards/guidelines</li> <li>• Consider the hazardous material on site</li> <li>• Consider if all emergency equipment is readily available</li> </ul>
Non-Routine Factors	<ul style="list-style-type: none"> <li>• Consider potential for workplace violence and harassment</li> <li>• Consider potential emergency situations linked with completing a particular task</li> <li>• Consider that a new hazard and risk assessment must be completed before conducting an incident investigation</li> <li>• Conducting a new hazard and risk assessment when a phase of a project changes             <ul style="list-style-type: none"> <li>○ Evaluate new equipment / machinery being introduced on site</li> <li>○ Evaluate major differences in working environment</li> </ul> </li> <li>• Consider hazards originating outside of the workplace that may impact workplace health and safety for which Duncor has control (e.g., working near power lines or high traffic areas, subcontractors on our site)             <ul style="list-style-type: none"> <li>○ Complete a PSERP – include site specific conditions, and HRA to effectively maintained a safe and healthy workplace</li> <li>○ Evaluate Subcontractor / Service Provider incidents</li> <li>○ Evaluate past incidents to compare relevance and probability of recurrence</li> <li>○ Consider training qualifications of uncommon training providers</li> </ul> </li> </ul>

The Health & Safety Coordinator, who has completed training in Hazard Identification and Risk Assessments, will be responsible for providing training to Supervisors / Forepersons in the same hazard identification and risk assessment process. This training, in addition to Basics of Supervising training defines a competent person.

The JHSC and Management will be involved in the Annual Management Review of the HRA. Senior Management, Supervisors and the JHSC will be involved in the V&H assessments and the development of PSERP's. Workers will review and sign PSERP's prior to working, and provide input / feedback.

The Supervisor / Foreperson or a competent person completes a daily JHA with workers onsite who are required to sign at the end of the JHA to confirm that all relevant information was communicated.

A worker may participate in the hazard assessment and analyses, provide input, and provide appropriate controls for the identified hazards. However, a worker may not sign in place of a Supervisor / Foreperson / Manager. Senior Management and the Health and Safety Coordinator will periodically, as often as necessary, review JHA and sign the acknowledgement section.

Management/ Supervisors will solicit feedback from workers during toolbox talks, safety meetings, quarterly JHSC meetings to ensure that hazards within the workplace are identified and implemented controls are effective. Will be documented on meeting minutes.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
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<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

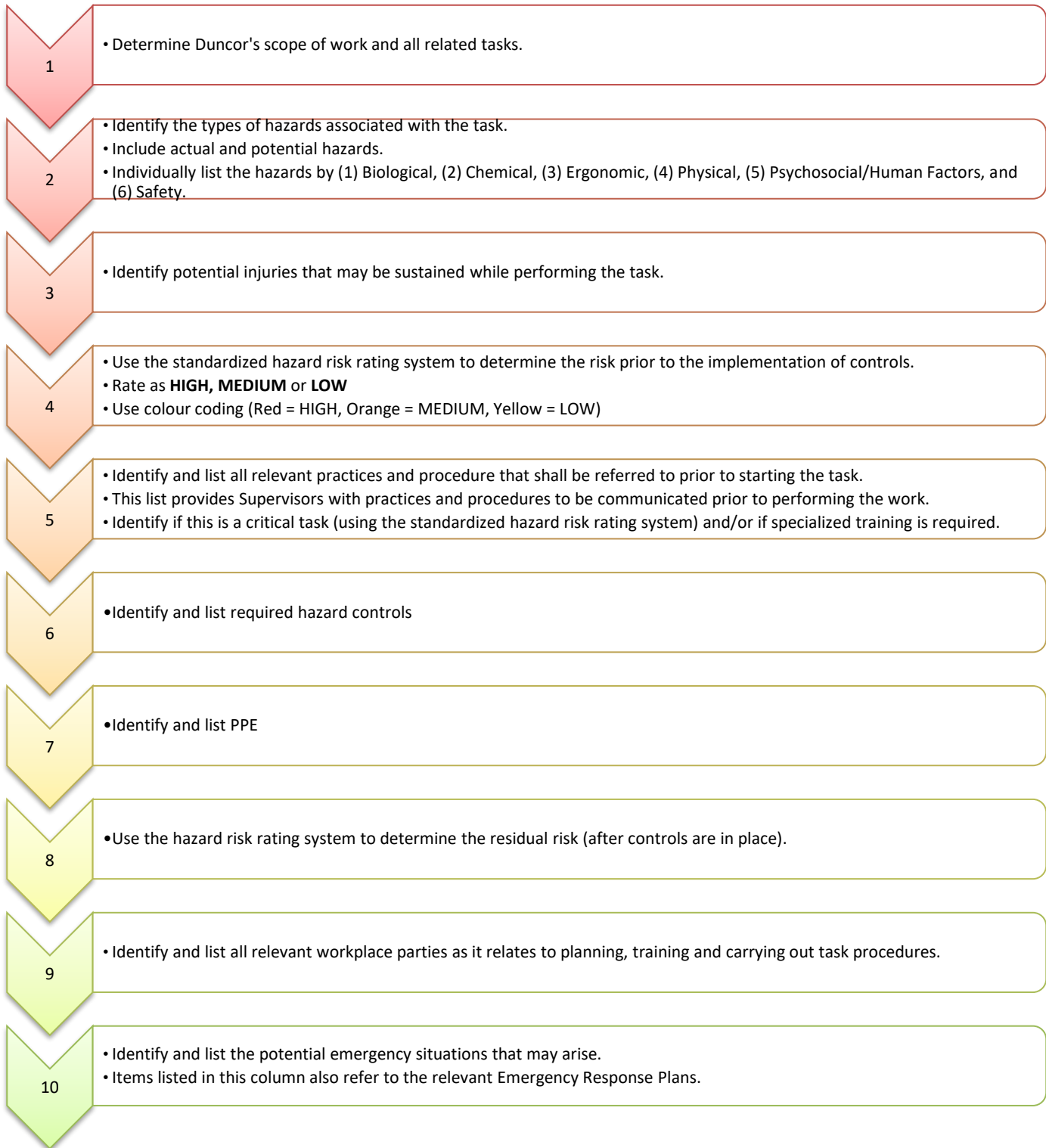
In addition to workers and supervisors, Senior Management shall ensure all appropriate parties are involved in this process, especially in areas of expertise in which Duncor does not have available. This will occur at a minimum during the Annual Management Review or during monthly management meetings. This may include acquiring input from:

- P. Eng.
  - o Management shall ensure all services acquired from P. Eng's, P. Geo's, or other, hold valid designations / licenses to practice in the area of expertise.
- Service providers
  - o Management shall ensure equipment maintenance providers are licensed mechanics and are authorized to perform service / maintenance on the specific equipment.
  - o Management shall ensure all subcontractors are competent in the work they perform. *Refer to Subcontractor Agreement Package and Element 4 of this Manual.*
- Equipment / tool / machinery suppliers
  - o Management shall ensure that all equipment / tools / machinery are procured from authorized sellers.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

Refer to the flow chart below to see the process to follow for completing task hazard and risk assessments





DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

Once the hazard assessment has been completed, the Health & Safety Coordinator shall ensure that a list of identified critical tasks and/or activities based on the risk rating system are developed. *Refer to Critical Task Risk Assessment Procedure.*

**TRAINING**

All employees will be trained in the Hazard Rating System and the resulting procedures and processes of the hazard assessment.

Required Competencies to perform hazard assessments:

Senior Management / Supervisor / Health & Safety Coordinator

- Hazard Identification & Risks Assessments Training
- Basics of Supervising

Workers

- Corporate & Site-Specific Orientation
- PSERP during the Site-Specific Orientation

**COMMUNICATION**

All resulting procedures and processes from the hazard assessment will be communicated to employees participating in the identified work task.

**RECORDKEEPING**

A record of all hazard assessments associated with the work tasks will be maintained by management. All records and documents are required to be kept and maintained as per Duncor’s Safety Document & Record Control System as per Element 1.10 of this manual.

**DOCUMENTS REQUIRED**

- JHA
- Project Specific Emergency Response Plan
- Confined Space Assessment (if applicable)
- Infection Control Assessment (if applicable)
- Workplace Violence & Harassment Assessment (OFFICE & SITE)
- Hazard & Risk Assessments (HRA)
- Critical Task Risk Assessment
- Safe Work Practices & Safe Job Procedures

**EVALUATION**

The successes and shortfalls of this procedure are to be evaluated by management on an annual basis, and changes are to be implemented where required.

Hazard assessments shall also be reviewed and revised to demonstrate improvement in events such as after incident investigations and where changes in phase of project occur.

**APPLICABLE LEGISLATION**

- Occupational Health and Safety Act R.S.O. 1990
- Ontario Regulations for Construction Projects, O. Reg. 213/91



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, VICE PRESIDENT
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## 2.3 HAZARD RATING SYSTEM

The HRS is a standardized tool that identifies the substandard practice or condition and immediately establishes its priority for correction according to its level of Severity and Probability. Ultimately, all hazards are rated as HIGH, MEDIUM, or LOW. All hazards identified as LOW are deemed to be above the acceptable/tolerated level for Duncor. All high-risk hazard tasks, hazards or incidents will require work to cease until the risk level can be reduced to an acceptable level. A more detailed breakdown of hazards is achieved via the following process:

### HAZARD RATING PROCESS

RISK RATING		PROBABILITY				
		1 – REMOTE	2 – UNLIKELY	3 – POSSIBLE	4 – LIKELY	5 – CERTAIN
SEVERITY	1 – MINOR	1	2	3	4	5
	2 – LOW	2	4	6	8	10
	3 – MEDIUM	3	6	9	12	15
	4 – HIGH	4	8	12	16	20
	5 – CRITICAL	5	10	15	20	25

The above Risk Chart is to capture a Pre-Control Risk Level with reviewing probability and severity ratings. Further details below are to capture a Post-Control Risk Level, similar to the above Risk Chart, there is a number value system to evaluate Probability and Severity to achieve the “High-Medium-Low” Rated Level.

All hazards will be evaluated using a simple formula to determine the risk posed by hazards.

$$\text{Risk Rating} = \text{Severity} \times \text{Probability}$$

#### Severity Categories

5	<b>Critical</b>	Causing death to one or more people. Loss or damage could cause serious business disruption.
4	<b>High</b>	Causing permanent disability (loss of limb, sight, hearing) and/or death
3	<b>Medium</b>	Causing temporary disability (fractures) or damage
2	<b>Low</b>	Causing significant injuries (sprains, lacerations)
1	<b>Minor</b>	Causing minor injuries (cuts, scratches). No lost time likely other than for first aid treatment

#### Probability Categories

5	<b>Certain</b>	Absence of any management controls. Almost 100% certain an incident will occur.
4	<b>Likely</b>	Effects of human behavior or other factors could cause an incident, but is unlikely without this additional factor.
3	<b>Possible</b>	Insufficient controls in place. Loss is unlikely but may occur in emergencies/non-routine conditions.
2	<b>Unlikely</b>	Situation is generally well-managed. But, occasional lapses could occur.
1	<b>Remote</b>	Loss, incident, or illness could only occur under freak conditions. All reasonable precautions were taken.

- **Total Risk Factor Weight or Rating Number**



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, VICE PRESIDENT
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

- Take the total multiplied from severity and probability to achieve a total number level
- The outcome of the two sections when not using the risk chart method
  - “Low” Risk Level = Low 1 – 8
  - “Medium” Risk Level = Medium 9 – 15
  - “High” Risk Level = High 16 – 25

**Note:** When the Risk Factor is High rated “Red”, a Safe Work Procedure must be implemented along with training and documentation. When the Risk Factor is Medium Rated or “Orange”, a Safe Work Practice must be implemented. When the Risk Factor is Low rated “Yellow”, a safe work practice will be deployed accordingly.

<b>HIGH</b>	<p><b>DEFINITION</b> A condition or practice likely to cause permanent disability, loss of life or extensive loss to property equipment/material. IDLH – Immediately Dangerous to Life and Health.</p> <p><b>ACTION</b> Immediate action required to eliminate the hazardous condition or practice. Work to cease until corrected.</p> <p><b>DOCUMENTED CONTROLS</b> SJP (at minimum), SWP</p>
<b>MEDIUM</b>	<p><b>DEFINITION</b> Condition or practice likely to cause a serious injury resulting in temporary disability or property damage that is disruptive but not extensive.</p> <p><b>ACTION</b> Action to be taken as soon as possible to rectify the hazardous condition, but immediately correct the unsafe practice.</p> <p><b>DOCUMENTED CONTROLS</b> SWP (at minimum), SJP (if required)</p>
<b>LOW</b>	<p><b>DEFINITION</b> Condition or practice likely to cause a minor, non-disabling injury or non-disruptive property damage.</p> <p><b>ACTION</b> Action may be taken depending on the level of irritancy, and the probability of occurrence.</p> <p><b>DOCUMENTED CONTROLS</b> SWP (at minimum), SJP (optional)</p>



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 2.4 PROJECT SPECIFIC EMERGENCY RESPONSE PLAN

### OVERVIEW

Pre-planning is critical to ensure that safety will be taken into account along with costs, schedules and other important job goals. By planning the hazards out of the job at the beginning stages of the project, we greatly reduce the risk of foreseeable uncontrolled events that may result in injury or property damage.

### PURPOSE

The purpose of the Project Specific Emergency Response Plan (PSERP) is to assess, review, and control project specific risks for the duration of the project.

### SCOPE

This procedure applies to all Duncor projects, prior to the start of the project.

### ROLES & RESPONSIBILITIES

#### Senior Management / Health & Safety Coordinator

- Appoint competent personnel to complete the hazard assessment, analysis and control process.
- Ensure a Project Specific Emergency Response Plan prior to the start of each project.
- Ensure all parties participating in the hazard assessment are trained in Hazard Identification and Risk Assessments.
- Ensure all legal and other requirements are taken into consideration when planning work.
- Review and approve any documents related to project planning.
- Ensure emergency preparedness documents are relevant and applicable.
- Ensure a First Aider is appropriately assigned, and all contact numbers are correct.
- Ensure the PSERP is reviewed at least annually if the duration of the project will last longer than 1 year.

#### Supervisors / Forepersons

- Ensure this document is accessible and readily available.
- Ensure all relevant parties are trained on the content within this PSERP during the site-specific orientation.
- Where applicable, initiate changes to the PSERP such as when a phase of the project changes, or when new hazards are introduced.
- Implement and follow all controls outlined in the PSERP.
- Ensure all workers comply with the controls outlined in the PSERP prior to commencing work.

#### Workers & JHSC

- Provide input and feedback.
- Participate in reporting all existing and potential hazards.
- Mutually approve the project safety plan with management.
- Where applicable, initiate changes to the PSERP such as when a phase of the project changes, or when new hazards are introduced.
- Implement and follow all controls identified in PSERP.

#### Service Providers / Subcontractors

- Person(s) who will be performing work shall ensure they are familiar with Duncor's hazard assessment documents.
- Subcontractors are required to perform hazard assessments based on their scope of work.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

- Required to communicate the hazards associated with their work and its effects on Duncor’s workplace health and safety.
- Required to understand and assess the risk posed to their employees from the work performed by Duncor.

Visitors

- Not applicable.

**PROCEDURE**

At the setup stages of the project, competent personnel such as the Health & Safety Coordinator or Project Manager will complete the PSERP and upon completion, review any, and all site-specific safety concerns with the Superintendent, and discuss possible control measures. The safety plan will also be the beginning stages for planning the following:

- ✓ Project-Specific Emergency Response Plans
- ✓ Project Specific Hazards and Controls
- ✓ Hospital Locations
- ✓ Project Emergency Contacts
- ✓ Traffic control – Determined by the GC
- ✓ Signage
- ✓ Public protection
- ✓ Designated substances (asbestos, lead, etc.)
- ✓ Access / Egress routes
- ✓ Legal and other standards and requirements

**TRAINING/COMMUNICATION**

Relevant elements of the PSERP will be reviewed with involved parties to ensure hazards and controls are communicated.

**RECORDKEEPING**

The PSERP will remain on file for the duration of the project. All records and documents are required to be kept and maintained as per Duncor’s Document & Record Control System as per Element 1.7 of this manual.

**EVALUATION**

The effectiveness of the PSERP will be evaluated on an annual basis. Changes will be made as required.

**APPLICABLE LEGISLATION**

- Occupational Health and Safety Act R.S.O. 1990
- Ontario Regulations for Construction Projects, O. Reg. 213

**Note:** A PSERP does not need to be completed under the following circumstance but must still be reviewed and approved by Duncor management and reviewed with all site staff.

1. When Duncor is not the general contractor and the general contractor’s
2. Project plan meets and/or exceeds Duncor’s standards.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## 2.5 CRITICAL TASK RISK ASSESSMENTS (CTRA)

### OVERVIEW

There is an inherent risk associated with all job tasks performed within the scope of work on a construction site. By identifying and ranking the hazards associated with each job task prior to the start of work, we are able to target the tasks in which further controls are required to reduce or eliminate the hazards associated.

### PURPOSE

The purpose of this procedure is to rank the hazard level associated with each work task in order to identify high risk hazard tasks that require further planning.

### SCOPE

A critical job inventory is required to be completed for all identified critical tasks and activities that will be occurring in the workplace based on the risk rating system.

### ROLES & RESPONSIBILITIES

#### Senior Management / Health & Safety Coordinator

- Ensure all tasks considered as “Critical Tasks” are easily identified by compiling and listing critical tasks into a separate document.

#### Supervisors / Forepersons

- Ensure this document is accessible and readily available.
- Ensure all workers are familiar with this document.
- Train workers in safe work practices and safe job procedures upon identification of critical tasks.

#### Workers & JHSC

- Understand the tasks that are identified as “critical tasks”.
- Ensure use of safe work practices and safe job procedures where required.

#### Service Providers / Subcontractors

- Not applicable.

#### Visitors

- Not applicable.

### PROCEDURE

Each task identified will be ranked, based on the risk rating system, according to severity and probability, and then given a critical rating score. The critical rating score will then be converted to a HIGH, MEDIUM or LOW hazard in order to identify whether further actions are required to control the risk associated with the work process. Critical tasks can be identified in the “HRA” and will be listed in a separate document, titled “Critical Task Risk Assessment” / “CTRA”.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## **TRAINING**

All Duncor employees will be trained on the Hazard Rating System and the resulting procedures and processes of the CTRA's. If additional training is required, Duncor Management will ensure to provide appropriate training to workers.

## **COMMUNICATION**

All resulting procedures and processes from the CTRA will be communicated to required employees.

## **RECORDKEEPING**

A record of all CTRA's associated with the work tasks will be maintained on site by Duncor management. All records and documents are required to be kept and maintained as per Duncor's Document & Record Control System as per Element 1.10 of this manual.

## **EVALUATION**

This procedure will be evaluated by management on an annual basis and changes will be implemented as required.

## **APPLICABLE LEGISLATION**

- Occupational Health and Safety Act R.S.O. 1990
- Ontario Regulations for Construction Projects, O. Reg. 213/91



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 2.6 JOB HAZARD ANALYSIS (JHA)

### PURPOSE

The purpose of this procedure is to ensure all trades are assessing the hazards related to upcoming work and ensuring adequate controls are identified and implemented.

### SCOPE

This procedure applies to all workers and subcontractors on Duncor projects.

### ROLES & RESPONSIBILITIES

#### Senior Management / Health & Safety Coordinator

- Ensure all trades complete a JHA on a daily basis.
- Ensure the JHA is reflective of and applicable to operations.
- Ensure the JHA contains all necessary fields.

#### Supervisors / Forepersons

- Ensure JHAs are completed on a daily basis prior to the start of work.
- Ensure the JHA is reviewed with all workers prior to the start of work.
- Ensure the JHA is submitted to Duncor management on a daily basis prior to the start of work.
- Implement all controls and where required, consult with Duncor management regarding required controls.
- Ensure all trades complete and submit a JHA on a daily basis, prior to the start of work.
- Assist the trade in implementing control methods, where identified or required.
- Ensure all workers are working in compliance with the control methods identified on the JHA.

#### Service Providers / Subtrade Foremen / Supervisors

- Ensure JHAs are completed on a daily basis prior to the start of work.
- Ensure the JHA is reviewed with all workers prior to the start of work.
- Ensure the JHA is submitted to Duncor management on a daily basis prior to the start of work.
- Implement all controls and where required, consult with Duncor management regarding required controls.

#### Workers

- Review the JHA with your foreman prior to the start of work.
- Comply with all controls identified on the JHA.

#### Visitors

- Not applicable

### PROCEDURE

Prior to the start of work each day, the Supervisor / Foreperson / Health & Safety Coordinator who holds a valid Basics of Supervising Training Certificate will take charge in completing the JHA.

In the JHA, the Supervisor / Foreperson / Health & Safety Coordinator will identify all expected work tasks for the day and the hazards associated with those tasks. The JHA will not only identify all expected work tasks, but



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

it is also required for workers to identify hazards originating outside of the workplace that may impact Occupational Health & Safety within the workplace and shall take into consideration the design and layout of the work area, ergonomics, machinery and processes.

It is mandatory that all risks are prioritized before and after identifying controls using the standardized risk rating system (see below).

The Supervisor / Foreperson / Health & Safety Coordinator will review the contents of the JHA with all workers prior to the start of work to ensure the hazards and risks are understood and that controls are implemented to prevent injuries or illness.

Should there be any changes in work activities throughout the day, an additional JHA is to be completed to pertain to the new tasks.





<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## **TRAINING**

All trades will receive training on the requirements of the completion of the JHA prior to the start of work on site.

## **COMMUNICATION**

The JHA will be communicated with all workers prior to the start of work.

## **RECORDKEEPING**

All JHAs will be submitted to Duncor management prior to the start of work and will be maintained on file by Duncor management.

All records and documents are required to be kept and maintained as per Duncor's Document & Record Control System as per Element 1.10 of this manual.

## **EVALUATION**

This procedure will be evaluated by management on an annual yearly basis, and changes will be implemented as required.

## **APPLICABLE LEGISLATION**

- Occupational Health and Safety Act R.S.O. 1990
- Ontario Regulations for Construction Projects, O. Reg. 213/91



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## ELEMENT 3: CONTROLS

REVISION LOG				
YEAR.REV #	REVISED BY	DATE REVISED	APPROVED BY	DESCRIPTION OF CHANGES
2021.1	J. LASTNAME	MM.DD.YYYY	MR. PRESIDENT	<ul style="list-style-type: none"> <li>• X</li> <li>• Y</li> <li>• Z</li> </ul>
2022.1	KELCIE STEVENSON	01.2022	BRIAN DUNCAN	<ul style="list-style-type: none"> <li>• HSMS2022.1 SUPERSEDED BY HSMS2023.1</li> </ul>
2023.1	KELCIE STEVENSON	01.25.2023	BRIAN DUNCAN	Included: <ul style="list-style-type: none"> <li>• Roles and Responsibilities for all relevant workplace parties</li> <li>• Controls Policy Statement</li> <li>• Controls procedure</li> </ul> Modified: <ul style="list-style-type: none"> <li>• Elements 3 &amp; 4 of old manual sections now fall under Element 3 in HSMS2023.1</li> </ul> Withdrew: <ul style="list-style-type: none"> <li>• HSMS2022.1 procedure</li> </ul>
2024.1	KELCIE STEVENSON	01.24.2024	BRIAN DUNCAN	Modified <ul style="list-style-type: none"> <li>• Controls procedure</li> <li>• Documents required</li> </ul> Withdrew: <ul style="list-style-type: none"> <li>• HSMS2023.1 procedure</li> </ul>
2025.1	KELCIE STEVENSON	01.22.2025	BRIAN DUNCAN	Modified: <ul style="list-style-type: none"> <li>• Controls procedure</li> </ul> Withdrew: <ul style="list-style-type: none"> <li>• HSMS2024.1 procedure</li> </ul>
2026.1	KELCIE STEVENSON	01.21.2026	BRIAN DUNCAN	Withdrew: <ul style="list-style-type: none"> <li>• HSMS2025.1 procedure</li> </ul>



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<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

### 3.1 CONTROLS POLICY STATEMENT

Duncor recognizes that the nature of work can be hazardous to workers if appropriate controls are not implemented. With that said, Duncor Senior Management is committed to promoting a safe and healthy work environment for its workers. Promoting this environment means to recognize the hazards, to communicate these hazards and risks, and to implement reasonably practicable controls, as necessary, to meet our goal of an accident-free workplace.

In order to achieve an accident-free workplace, Duncor requires full participation from its employees, subcontractors, and visitors. Duncor and employees, subcontractors and visitors shall adhere the Occupation Health and Safety Act, other legal requirements and Duncor policies and procedures found in Appendices A & B compliance may result in disciplinary action.

In light of working in spirit of consultation and cooperation with workers, Duncor insists that workers and/or the JHSC Worker Representative provide recommendations to Senior Management for discussion and review.

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**Brian Duncan, Vice President**  
January 23, 2026



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 3.2 HAZARD CONTROLS

### OVERVIEW

There are many different hazards present in the workplace that can have a harmful effect on the body. There are four categories of hazards: chemical, physical, biological and ergonomic. Different types of hazards also pose different types of risks to the body, and thus control measures must be applied to eliminate or reduce the risks, which can in turn prevent occupational disease, physical injury or other deleterious effects on the body. In order to successfully implement controls within the workplace, management and workers are required to participate in the development and review of controls.

### PURPOSE

The purpose of this procedure is to ensure that adequate controls are available and implemented in the workplace to protect and maintain the health and safety of all workers.

### SCOPE

This procedure applies to all Duncor work locations.

### DEFINITIONS

Chemical Hazard: Can be any solid, liquid, gas, vapour or fume that poses a physical or health hazard (e.g., carbon monoxide, diesel, dust, etc.).

Physical Hazard: Come from sources of energy that may cause injury or disease (e.g., noise, temperature, vibration, etc.).

Biological Hazards: Come from working with animals, people or infectious plant materials (e.g., blood, bodily fluids, moulds, animals, etc.).

Ergonomic Hazards: Occur when the type of work, body position and working conditions put strain on your body (e.g., repetitive motions, poor lighting, using too much force, etc.).

Safety Hazards:

### ROLES & RESPONSIBILITIES

#### Senior Management/Health & Safety Coordinator

- Ensure compliance with the Occupational Health and Safety Act and all applicable regulations, standards and codes.
- Ensure workers are provided with all required training.
- Provide all controls that are reasonably practicable.
- Review and evaluate controls on an as-necessary basis, and at least annually.
- Ensure all controls, revisions and new control processes are approved.
- Lead the development and review of controls process.

#### Supervisors / Forepersons

- Ensure compliance with the Occupational Health and Safety Act and all applicable regulations, standards and codes.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

- Ensure all workers are provided with and wear PPE required for the hazard in which they are exposed to.
- Ensure all workers are informed about the hazards in which they will be working with.
- Lead the development and review of controls process.

Service Providers / Subtrade Foremen

- Ensure Duncor management has approved all controls associated with the work performed by the subcontractor / service provider.
- Ensure adequate controls are in place prior to commencement of work.
- Controls must be implemented in consideration of the hierarchy of controls and applicable legal and other requirements.
- Ensure all controls are documented on specific forms.
- Communicate any and all controls to relevant workplace parties.

Workers

- Work in compliance with the Occupational Health and Safety Act and all applicable regulations, standards and codes.
- Wear/use all PPE appropriate for the hazard in which you are exposed to.
- Do not attempt to alter or bypass any control methods in place.
- Participate in the development and review of controls process.

Visitors

- N/A

**PROCEDURE**

The employer / Senior Manager and the Health and Safety Manager are responsible for identifying all types of hazards that may be present in the workplace and conveying the hazards to all individuals that may be exposed to or affected by such hazards.

It is the responsibility of the employer, Management, and Supervisor / Foreperson to take all reasonable precautions in the circumstance for the health and safety of the workers; therefore, controls must be in place to reduce the potential harm that may result from exposure to hazards at the workplace. The Employer/Supervisor / Foreperson is responsible for ensuring that control measures are made readily available at the point of use as required. Relevant parties can find them in the following documents:

**(1) HRA**

Workers may refer to the hazards, risk rating, controls required, applicable SWPs / SJPs, and potential emergency situations with any given task.

**(2) SWPs / SJPs**

Documentation providing best practice for a specific task, or, a step-by-step procedure ensuring the safest method possible.

**(3) JHA**

A document completed on a daily basis, reviewing the daily tasks, hazards and controls.

In order for controls to be successful, the Employer/Senior Management shall ensure workers are included in the process of developing and reviewing methods of controls, such as Safe Work Practices and Safe Job



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

Procedures (see *Element 3.3 and 3.4*) through participation in Annual Review Meetings and Monthly H&S Meetings. Management and workers will develop, and review controls through participation in Monthly Management Meetings, quarterly JHSC meetings and during routine workplace inspections. Duncor will solicit feedback from workers during Toolbox Talks to review controls to determine applicability and suitability for the OHSMS.

Where possible, controls are best applied at the source (where the hazard comes from), followed by the path, the route in which the hazard travels (air, water, etc.) and lastly at the receiver (the worker, the environment, public persons). Safe Work Practices and Safe Job Procedures will outline all controls required to ensure that all hazards have been eliminated, substituted, or minimized to protect the worker.

Senior Management and the Health & Safety Coordinator are responsible for the review and approval of SWPs and SJPs during Senior Management Review Meetings, or as necessary, during monthly H&S Meetings with the participation of workers.

Implementation of controls shall take into account the hierarchy of controls. Types of controls that can be applied at the workplace include:

Steps from 1 (preferred method) to 4 (least preferred method) to be followed when determining appropriate controls, which will be reflected in SWPs, SJPs, and JHAs.

- (1) **Elimination/Substitution:** Removing the hazard or replacing it with a different substance or material so that it is no longer hazardous.
- (2) **Engineering:** Methods that are built in or designed into the process (e.g., machine guarding, methods of ventilation, etc.)
- (3) **Administrative:** Controls that alter the way in which work is done (e.g., after-hours work, Safe Job Procedures, housekeeping, etc.).
- (4) **Personal Protective Equipment:** Equipment worn by workers to reduce the contact or exposure to hazards (e.g., safety glasses, gloves, ear plugs, etc.).

In alignment with the hierarchy of controls, all relevant workplace parties shall take applicable legal requirements, standards, guidelines and manufacturer specifications into consideration when developing controls. All situations in the workplace differ therefore it is important to remember that all hazards are to be controlled to the extent that is reasonably possible for the circumstances. Duncor will review and consider applicable legislation when reviewing and implementing controls during annual management reviews.

Specific hazardous materials require more in-depth procedures to be completed and have legislation in place to ensure that the proper precautions are taken when workers may be exposed to the materials. Lead, asbestos, silica and coal tar products are common designated substances that are found in construction. All parties involved must be notified and informed, and Safe Work Practices / Safe Job Procedures are required to be submitted based on each particular situation encountered.

## TRAINING

All workers are to receive training on the specific procedures related to the work in which they will be partaking in prior to the start of work. Workers are to receive all other specific training (e.g., asbestos awareness) required in their scope of work.

## COMMUNICATION

All workers are to be made aware of this procedure and appropriate control measures during orientation prior to the start of work, during the JHA / hazard assessment process, at monthly H&S meetings and toolbox talks.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

Changes made to existing control process require further communication to relevant workplace parties.

## RECORDKEEPING

All records of training are to be submitted to Duncor and maintained on file in the site office and on the Duncor server where they are readily available for worker access from the assigned devices.

Controls shall be documented in the Hazard & Risk Assessments document, in safe work practices and safe job procedures and in the JHA.

All records and documents are required to be kept and maintained as per Duncor's Document & Record Control System as per Element 1.10 of this manual.

## DOCUMENTS REQUIRED

- HRA
- Safe Work Practices
- Safe Job Procedures
- JHA
- Toolbox Talks

## EVALUATION

This procedure will be evaluated by management on an annual basis and as frequently as necessary. All controls and any changes required shall be approved by Senior Management/Management prior to implementation and will be accompanied with H&S Meeting Minutes demonstrating document control information.

## APPLICABLE LEGISLATION

- Occupational Health and Safety Act R.S.O. 1990
- Ontario Regulations for Construction Projects, O. Reg. 213/91
- Designated Substance—Asbestos on Construction Projects and in Buildings and Repair Operations, O. Reg. 278/05



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

### 3.3 SAFE WORK PRACTICES

#### PURPOSE

The purpose of this procedure is to ensure the development and implementation of safe work practices. SWPs are created for tasks performed by Duncor.

#### SCOPE

This procedure applies to all Duncor staff and subcontractors.

#### DEFINITIONS

Safe Work Practice: Safe work practices are generally written methods outlining how to perform a task with minimum risk to people, equipment, materials, environment, and processes. SWPs identify potential hazards, controls, initial and residual risk ratings, and PPE required.

#### ROLES & RESPONSIBILITIES

##### Senior Management

- Ensure annual review of safe work practices during the Senior Management Annual Review Meeting.
- Ensure all distributed safe work practices are approved.
- Ensure all legal and other requirements are taken into consideration when developing safe work practices.

##### Management/Supervisors / Forepersons

- Ensure safe work practices are developed and implemented as required.
- Ensure safe work practices are available to all workers for any applicable work activities.
- Conduct inspections and spot checks to ensure all workers are engaging in safe work practices.
- Ensure all workers are adequately trained to perform tasks required in their scope of work.
- Ensure SWPs are reviewed with workers, as necessary, to ensure they understand the content.

##### Subcontractors

- Ensure safe work practices are developed and implemented as per your scope of work.
- Ensure all workers in your charge are following the safe work practices.
- Apply any disciplinary measures for workers where required.

##### Workers

- Ensure you are following all safe work practices/procedures in place for your job activity.
- Ensure you understand all safe work practices/procedures or seek clarification where required.

##### Visitors

- N/A



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

**PROCEDURE**

Management, Supervisors / Forepersons and the Health & Safety Coordinator shall complete the required hazard assessment process outlined in Element 2 to determine the activities which require safe work practices/procedures. These safe work practices will identify whether a medium-rated or low-rated risk is associated with the task.

Health and Safety and/or supervisory staff will complete safe work practices/procedures where required.

Subcontractors will be responsible for the completion and implementation of safe work practices/procedures as they pertain to their scope of work. Dependent on the nature of the work and circumstances, Duncor management may request additional safe work practices/procedures from subcontractors.

**TRAINING**

All workers will receive training on the safe work practices/procedures that are relevant to the tasks in which they will be performing. Subcontractors are responsible to communicate their specific safe work practices/procedures to their workers. A competent person, as defined in Element 2, must conduct the training (e.g., Safety Manager, Supervisor / Foreperson, health and safety rep, etc.).

**COMMUNICATION**

Safe work practices/procedures will be communicated to Duncor staff through orientation, Toolbox Talks or other formal or informal training session as required. Subcontractors are responsible to communicate their specific safe work practices/procedures to their workers.

**RECORDKEEPING**

All safe work practices will be maintained on file.

All records and documents are required to be kept and maintained as per Duncor’s Document & Record Control System as per Element 1.7 of this manual.

**EVALUATION**

This procedure will be evaluated by management on an annual basis and changes will be implemented as required.

**APPLICABLE LEGISLATION**

- Occupational Health and Safety Act R.S.O. 1990
- Ontario Regulations for Construction Projects, O. Reg. 213/91



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

### 3.4 SAFE JOB PROCEDURES

#### PURPOSE

The purpose of this procedure is to ensure the development and implementation of safe job procedures. SJPs are created for tasks performed by Duncor.

#### SCOPE

This procedure applies to all Duncor staff and subcontractors.

#### DEFINITIONS

Safe Job Procedure: Safe Job Procedures provide step-by-step information to employees and outlines how to conduct a particular task or operate equipment in a safe manner.

#### ROLES & RESPONSIBILITIES

##### Senior Management

- Ensure annual review of safe job procedures during the Senior Management Annual Review Meeting.
- Ensure all distributed safe job procedures are approved.
- Ensure all legal and other requirements are taken into consideration when developing safe job procedures.

##### Management/Supervisors / Forepersons

- Ensure safe job procedures are developed and implemented as required.
- Ensure safe job procedures are available to all workers for any applicable work activities.
- Conduct inspections and spot checks to ensure all workers are engaging in safe job procedures.
- Ensure all workers are adequately trained to perform tasks required in their scope of work.
- Ensure SJPs are reviewed with workers, as necessary, to ensure they understand the content.

##### Subcontractors

- Ensure safe job procedures are developed and implemented as per your scope of work.
- Ensure all workers in your charge are following the safe job procedures.
- Apply any disciplinary measures for workers where required.

##### Workers

- Ensure you are following all safe work practices/procedures in place for your job activity.
- Ensure you understand all safe work practices/procedures or seek clarification where required.

##### Visitors

- N/A



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## **PROCEDURE**

Management, Supervisors / Forepersons and the Health & Safety Coordinator shall complete the required hazard assessment process outlined in Element 2 to determine the activities that require safe work practices/procedures.

Subcontractors will be responsible for the completion and implementation of Safe Job Procedures as they pertain to their scope of work. Dependent on the nature of the work and circumstances, Duncor management may request additional Safe Job Procedures from subcontractors.

All high risk, critical and/or out of the ordinary tasks rated as a “HIGH” hazard or greater (as per Duncor’s Hazard Rating System) shall have a Safe Job Procedure.

## **TRAINING**

All workers will receive training on the safe work practices/procedures that are relevant to the tasks in which they will be performing. Subcontractors are responsible to communicate their specific safe work practices/procedures to their workers. A competent person must conduct the training (e.g., Health and Safety, Supervisor / Foreperson, health and safety rep, etc.).

## **COMMUNICATION**

Safe work practices/procedures will be communicated to Duncor staff through orientation, toolbox talks or other formal or informal training session as required. Subcontractors are responsible to communicate their specific safe work practices/procedures to their workers.

## **RECORDKEEPING**

All safe job procedures will be maintained on file.

All records and documents are required to be kept and maintained as per Duncor’s Document & Record Control System as per Element 1.10 of this manual.

## **EVALUATION**

This procedure will be evaluated by management on an annual basis and changes will be implemented as required.

## **APPLICABLE LEGISLATION**

- Occupational Health and Safety Act R.S.O. 1990
- Ontario Regulations for Construction Projects, O. Reg. 213/91



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

# ELEMENT 4: PROCUREMENT & CONTRACTOR MANAGEMENT

REVISION LOG				
YEAR.REV #	REVISED BY	DATE REVISED	APPROVED BY	DESCRIPTION OF CHANGES
2021.1	J. LASTNAME	MM.DD.YYYY	MR. PRESIDENT	<ul style="list-style-type: none"> <li>• X</li> <li>• Y</li> <li>• Z</li> </ul>
2022.1	KELCIE STEVENSON	01.2022	BRIAN DUNCAN	<ul style="list-style-type: none"> <li>• HSMS2022.1 SUPERSEDED BY HSMS2023.1</li> </ul>
2023.1	KELCIE STEVENSON	01.25.2023	BRIAN DUNCAN	Included: <ul style="list-style-type: none"> <li>• NEW SECTION</li> <li>• Roles and Responsibilities for all relevant workplace parties</li> <li>• Procurement &amp; Contractor Management Policy Statement</li> <li>• Selection Procedure</li> <li>• Monitoring and Evaluation Procedure</li> </ul> Withdrew: <ul style="list-style-type: none"> <li>• HSMS2022.1 procedure</li> </ul>
2024.1	KELCIE STEVENSON	01.24.2024	BRIAN DUNCAN	Withdrew: <ul style="list-style-type: none"> <li>• HSMS2023.1 procedure</li> </ul>
2025.1	KELCIE STEVENSON	01.22.2025	BRIAN DUNCAN	Withdrew: <ul style="list-style-type: none"> <li>• HSMS2024.1 procedure</li> </ul>
2026.1	KELCIE STEVENSON	01.21.2026	BRIAN DUNCAN	Included: <ul style="list-style-type: none"> <li>• Coordinating Safety on Multi-Employer Sites</li> </ul> Modified: <ul style="list-style-type: none"> <li>• Roles and Responsibilities for Subcontractors and Service Providers</li> <li>• Included definition "relevant workplace parties"</li> <li>• Monitoring and Evaluation</li> <li>• Communication</li> </ul> Withdrew: <ul style="list-style-type: none"> <li>• HSMS2025.1 procedure</li> </ul>



**DUNCOR**  
ENTERPRISES INC.

<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## 4.1 PROCUREMENT & CONTRACTOR MANAGEMENT POLICY STATEMENT

Duncor Senior Management is fully committed to providing a healthy, safe and environmentally friendly workplace for its employees and subcontractors. Duncor holds a high safety standard and will ensure that the same standards are upheld when selecting subcontractors to work on our sites. Duncor's expectation is to employ subcontractors whose management, leadership and systems have demonstrated positive results in health, safety and environmental performance.

Duncor has implemented a standardized process when selecting/hiring subcontractors. This process will encompass a health and safety review/screening of the prospective contractor's HSMS and performance.

To ensure all hazards are correctly accounted for and appropriate controls are implemented, hazard assessments will be conducted on each of Duncor's site that the subcontractor/service provider will be present on. Duncor will be responsible for collecting subcontractor/service provider hazard assessments for recordkeeping.

Subcontractors shall ensure that any, and all work performed by their employees and/or the employees of their subcontractors/service providers meet the legal requirements and standards. Subcontractors are not permitted to subcontract any portion of their work without first notifying and obtaining approval by Duncor.

**Brian Duncan, Vice President**  
January 23, 2026



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 4.2 PROCUREMENT & CONTRACTOR MANAGEMENT

### OVERVIEW

The use of subcontractors on projects present a unique set of challenges with selection, scheduling, compliance, and monitoring. This program helps provide clear directives as to how to select, monitor and evaluate subcontractor safety related performance.

### PURPOSE

The purpose of this procedure is to establish a standardized Subcontractor procurement process and to provide instruction and guidelines when contracting work. This will ensure the following:

1. Duncor has provided the Subcontractor with the minimum health and safety requirements,
2. Selected Subcontractors are meeting the specified health and safety requirements as per Duncor's standards, legislation and other requirements and,
3. Performance monitoring systems that will be used to evaluate the Subcontractor's health and safety performance during the engagement of work to identify opportunities for continuous improvement.

### SCOPE

This procedure is to be used for all subcontractors engaged in contract with Duncor for execution of work on projects.

### ROLES & RESPONSIBILITIES

#### Senior Management

- Ensure you understand your roles and responsibilities pertaining to subcontractor management.
- Review all subcontractor documentation including reviews of hazard assessments at the monthly management meetings.
- Ensure Supervisor / Foreperson complete the Subcontractor Check-in forms.
- Ensure the organization leads the coordination of their site-specific OHS requirements on multi-employer workplaces.
- Ensure designates assigned to the selecting, monitoring and evaluating of subcontractors / service providers are trained / competent in doing so.

#### Project Manager

- Ensure you understand your roles and responsibilities pertaining to subcontractor management.
- Ensure Subcontractor Safety Agreements are completed, submitted and reviewed by Duncor head office prior to trades arrival on site.
- Ensure all outlined criteria in the agreement package has been satisfied and confirm documentation such as WSIB and insurance have been submitted and approved prior to arrival on site.
- Ensure Subcontractor's supplemental documentation is collected and submitted to the Health & Safety Coordinator.
- Conduct subcontractor evaluations in conjunction with the Health & Safety Coordinator.

#### Health & Safety Coordinator

- Complete Subcontractor evaluations using the Subcontractor Evaluation form.
- Collect Subcontractor supplemental documentation for review and recordkeeping.
- Review subcontractor Hazard Assessment submissions.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

- Review completed Subcontractor Safety Agreement Packages and Subcontractor Check-in forms.
- Lead coordination of site-specific OHS requirements on multi-employer workplaces.
- Ensure to effectively communicate changes affecting the health and safety of the workplace to Subcontractors using an agreed upon communication method (e.g., phone, verbal, written memo, etc.), where required.
- Ensure the use of appropriate forms to perform the selecting, monitoring and evaluating of Subcontractors / Service Providers.
- Ensure reviews of subcontractor / service provider evaluations. These shall be documented in the monthly H&S Meeting Minutes

Supervisors / Forepersons

- Ensure you understand your roles and responsibilities pertaining to subcontractor management.
- Assist the Health & Safety Coordinator with completing the subcontractor evaluations.
- Review the Hazard Assessments from subtrades and ensure the controls are implemented at site level.
- Complete the Subcontractor Check-in forms the day the subcontractor arrives on site.
- Ensure to effectively communicate changes affecting the health and safety of the workplace to Subcontractors, where required.

Subcontractors / Service Providers

- Work in a manner that does not jeopardize the health and safety of others and is in accordance with the Occupational Health and Safety Act and Regulations.
- Submit supplemental documentation to Duncor Health & Safety Coordinator/Project Manager.
- Submit copies of training certificates and ensure workers are provided training to safely perform assigned work.
- Communicate changes affecting the health and safety of the site to the Health & Safety Coordinator/Project Manager/Supervisor / Foreperson.
- Submit copies of inspection reports/Toolbox Talks/investigation reports and other documents produced on site.
- Provide competent supervision to their employees and subcontractors that they employ.
- Both short-term and long-term subcontractors are expected to comply with the same health and safety responsibilities outlined in this procedure. However, additional monitoring may be applied to long-term subcontractors, and higher documentation standards may be required based on the duration and complexity of work.

Visitors

- N/A

**PROCEDURE**

Definitions

Long-Term Subcontractor: Any company hired by Duncor that will be working on site for a duration of 3 weeks or longer.

Short-Term Subcontractor: Any company hired by Duncor that will be working on site for a duration of less than 3 weeks.

Relevant Workplace Parties: Duncor, Subcontractors, Service Providers, GC, etc.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

### Coordinating Safety on Multi-Employer Sites

Duncor will coordinate their OHS requirements on multiemployer workplaces in the following ways:

- Duncor is the GC –
  - All parties hired to perform work on a Duncor jobsite will be required to use Duncor forms if it does not meet Duncor standards.
  - Duncor emergency response signals will take precedent over trades. All parties will be trained during the site-specific orientation.
  - **Trade meetings will occur at a frequency determined by Duncor senior management. All trades must ensure a representative is available.**
- Duncor is the subcontractor –
  - Duncor will complete their own JHAs. Any additional information required by the GC will be provided.
  - Duncor will follow the GC’s emergency signals. New information will be provided to Duncor employees and subtrades.
  - If required, Duncor will participate in meetings required by the GC.

### **BIDDING PROCESS**

Prior to awarding work to any Subcontractors, Duncor Project Managers will provide Subcontractor Project Managers with the Subcontractor Safety Agreement which is to be completed in full. Once complete, the document is to be reviewed to ensure all criteria have been met. Selection of both long-term and short-term subcontractors will be determined by using the below criteria:

- Cost to perform work
- Ability to manage resources and ability to meet deadlines
- Good standing
- Communication
- OH&S Statistics
- WSIB
- Insurance coverage
- Resources allocated for safety on the project
- Staff allocations for safety on the project
- Subcontractor HSMS
- Subcontractor possesses the ability and competency to be able to assess, analyze and control hazards arising from:
  - Their own activities and operations that may impact the Duncor’s workers and other interested parties in the workplace, and
  - Duncor’s work that they impact their own workers.
- Training / Qualifications / Certificates

### **AWARDING**

At this stage, the Agreement package has been reviewed and approved and all criteria must be met. Areas where the Subcontractor’s HSMS does not meet minimum requirements, the Health & Safety Coordinator and Project Manager will communicate with the Subcontractor Project Manager to determine which Duncor’s documentation / forms shall be used. Once determined and agreed upon by both parties, the trade may mobilize to site.

### **MOBILIZATION**

Once on site the Subcontractor Check-in form is to be completed indicating who is primary contact, supervisor,



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

worker rep and confirmation that the required documentation has been submitted and approved.

Duncor Health & Safety Coordinator will be required to file all pre-qualification documents in the corresponding folder within the database.

For sites where Duncor Managers / Supervisors are not assigned, Duncor Health & Safety Coordinator must ensure a competent Supervisor is assigned to complete all legislated and program required forms.

### **MONITORING AND EVALUATION**

Subcontractor monitoring and evaluation will be completed for each trade that is working on the project to ensure consistency and compliance with legal requirements and the requirements of our HSMS. Each evaluation will be presented to management at the monthly management meetings and prior to the end of the project in which the evaluations have been conducted. Evaluations may be reviewed earlier than stated beforehand if management deems necessary to ensure compliance or for continued work on the project. Evaluation criteria will contain the following:

- Site conditions
- Completion of safety documentation
- Injuries/accidents on site
- PPE use
- Infraction notices
- Training records
- Ability and diligence for completing and submitting related paperwork on a regular basis
- Handling of materials and chemicals on site
- Equipment and machinery use

Senior Management and/or the Health & Safety Coordinator will review the Subcontractor evaluations at the monthly management meetings and determine whether or the trade is performing in accordance with Duncor requirements and industry best practices.

Duncor will monitor third-party service providers involved in its operations to ensure they are working in accordance with company safety expectations. This may include on-site observations, verbal check-ins, or completion of the Subcontractor Evaluation Form where applicable. Any issues or non-compliance will be documented and addressed. Records of monitoring activities will be maintained in accordance with Duncor's document and record control procedures.

### **HAZARD ASSESSMENTS**

The hazard assessment tool is an important tool for hazard identification, analysis and implementation of effective control methods for specific tasks. Duncor will maintain a project HRA (embedded in the Project Specific Emergency Response Plan) to which the Subcontractor will be required to review and acknowledge. Requesting that Subcontractors complete a hazard assessment will assist Duncor in assessing their ability and competency to analyze and control hazards arising from their own work that may impact our workers.

The hazard assessment must account for hazards associated with the work, its impact on health and safety of Duncor employees & other site personnel and must address methods to effectively eliminate the hazards to mitigate and control the risks. The Subcontractor and its employees shall become familiar with the controls that Duncor has implemented to ensure ongoing control methods are understood and maintained. Additional controls may be required in the event new hazards arise during the hazard assessment process. These controls must be approved by Senior Management prior to implementation.



**DUNCOR**  
**ENTERPRISES INC.**

<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

Subcontractors are responsible for completion of daily JHAs and ensure copies are submitted to Duncor’s Health & Safety Coordinator.

### **FINAL SUBCONTRACTOR EVALUATION**

A Subcontractor Evaluation Form must be completed on a regular basis. The table below will outline the Subcontractor’s compliance percentage.

In the event a Subcontractor / Service Provider is unable to provide adequate Health & Safety forms, Duncor may lead the coordination of site specific OHS requirements in the following ways:

- Provide Health & Safety forms that meets Duncor’s and legislative standards
- Allow the Subcontractor to participate in documented Health & Safety meetings on site
- Duncor to provide site-specific orientations for Subcontractors / Service Provider



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

### SUBCONTRACTOR STATUS CLASSIFICATION

Each evaluation will be completed with a compliance percentage. The classification status based off the evaluations for subcontractors will be as follows:

%	Risk	Guideline
0 - 35%	<b>HIGH</b>	<ul style="list-style-type: none"> <li>Possible removal of bidding privileges unless improvements are made, or additional supports may be furnished by Duncor to ensure adherence to the OH&amp;S program and legislative compliance.</li> <li>Contract back charges may be levied to the subcontractor for any supports or provisions provided by Duncor.</li> </ul>
36 – 79%	<b>MEDIUM</b>	<ul style="list-style-type: none"> <li>Possible removal of bidding privileges unless improvements are made, or additional supports may be furnished by Duncor to ensure adherence to the OH&amp;S program and legislative compliance.</li> <li>Contract back charges may be levied to the subcontractor for any supports or provisions provided by Duncor.</li> <li>Considerations for future bidding privileges to be directed by management.</li> </ul>
80 -100%	<b>LOW</b>	<ul style="list-style-type: none"> <li>Future bidding privileges to remain intact unless otherwise directed by management.</li> </ul>

Management reserves the right to reduce, remove or reinstate subcontractor bidding privileges at any time based off the evaluations and performance of the subcontractor. Additional guideline and provisions may also be made by management on a case-by-case basis.

Based on the Subcontractor’s average score, Duncor will categorize Subcontractors in the “Approved Subcontractors” list or the “Blacklisted Subcontractors”.

<b>0 – 35%</b>	Subcontractors achieving an average score of 0 – 35% will be placed in the “Blacklisted Subcontractors” list.
<b>36 – 79%</b>	Subcontractors achieving an average score of 36 – 79% will have the opportunity for improvement. This will be based on Duncor’s discretion. Should Management feel that they fail to meet the minimum requirements, a Subcontractor may then be placed in the “Blacklisted Subcontractors” list.
<b>80 – 100%</b>	Subcontractors achieving an average score of 80 – 100% will be placed in the “Approved Subcontractors” list. These Subcontractors will have the ability to bid on future projects. The Subcontractor Project Manager and Duncor Health & Safety Coordinator and Project Manager are required to maintain current documents regularly.

### TRAINING

All management employees will be trained on the Subcontractor Management System and the resulting procedures and processes of the program as follows:

- Senior Management, the Health & Safety Coordinator and/or Project Manager will be competent in:
  - Hazard Identification & Risk Assessments
  - Analyzation of Subcontractor Health & Safety Management Program content
  - Assessing introduction of new hazards, how it will affect Duncor workers and existing trades, and control methods
- Supervisors / Forepersons will be competent in:
  - Hazard Identification & Risk Assessments
  - Monitoring – Ensuring all required Subcontractor Health & Safety documentation are completed on a regular basis and are submitted
  - Performing Subcontractor evaluations

All subcontractors shall attend Duncor’s Site-Specific Orientation to review the health and safety requirements while on site.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## COMMUNICATION

All resulting procedures and processes from the Subcontractor Management System will be communicated to employees participating in the program.

Further communication shall be provided to all relevant workplace parties should there be changes affecting the health and safety of the work. In addition to pre-planned changes, immediate changes affecting the health and safety of the workplace shall be immediately communicated amongst all trade Supervisors and Duncor Supervisors / Forepersons to ensure rapid communication to other relevant parties.

Prior to the commencement of work, a communication method shall be established between Duncor Supervisors / Forepersons and its Subcontractors / Service Providers. This will be discussed during the site-specific orientation. Changes affecting the health and safety of the workplace should be documented through additional reviews of the JHA to ensure all workplace parties are regularly assessing hazards and associated risk.

Duncor will ensure subcontractors / service providers are made aware of any changes that may impact health and safety on site. Communication methods may include direct phone calls, written memos, verbal instruction upon arrival, or signage at the delivery/access point. When feasible, any changes will be communicated in advance through dispatch or coordination channels. Supervisors are responsible for ensuring third-party companies are notified in a timely and effective manner. These communications should be documented where appropriate.

## RECORDKEEPING

Subcontractor documentation and records will be maintained by management for a minimum of 3 years.

All records and documents are required to be kept and maintained as per Duncor's Document & Record Control System as per Element 1.10 of this manual.

## DOCUMENTATION REQUIRED

- Contractor Check-In Form
- Declaration of Supervisor Competency Form
- Required Subcontractor Submittals
- Subcontractor Evaluation Form
- Subcontractor Agreement Package
- JHA

## EVALUATION

The successes and shortfalls of this procedure are to be evaluated by management on an annual basis, and changes are to be implemented where required.

## APPLICABLE LEGISLATION

- Occupational Health and Safety Act R.S.O. 1990
- Ontario Regulations for Construction Projects, O. Reg. 213/91



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## ELEMENT 5: COMPANY RULES

REVISION LOG				
YEAR.REV #	REVISED BY	DATE REVISED	APPROVED BY	DESCRIPTION OF CHANGES
2021.1	J. LASTNAME	MM.DD.YYYY	MR. PRESIDENT	<ul style="list-style-type: none"> <li>• X</li> <li>• Y</li> <li>• Z</li> </ul>
2022.1	KELCIE STEVENSON	01.2022	BRIAN DUNCAN	<ul style="list-style-type: none"> <li>• HSMS2022.1 SUPERSEDED BY HSMS2023.1</li> </ul>
2023.1	KELCIE STEVENSON	01.25.2023	BRIAN DUNCAN	Included: <ul style="list-style-type: none"> <li>• Roles and Responsibilities for all relevant workplace parties</li> <li>• Company Rules Policy Statement</li> </ul> Withdrew: <ul style="list-style-type: none"> <li>• HSMS2022.1 procedure</li> </ul>
2024. 1	KELCIE STEVENSON	01.24.2024	BRIAN DUNCAN	Withdrew: <ul style="list-style-type: none"> <li>• HSMS2023.1 procedure</li> </ul>
2025.1	KELCIE STEVENSON	01.22.2025	BRIAN DUNCAN	Modified <ul style="list-style-type: none"> <li>• Company Rules procedure</li> </ul> Withdrew: <ul style="list-style-type: none"> <li>• HSMS2024.1 procedure</li> </ul>
2026.1	KELCIE STEVENSON	01.21.2026	BRIAN DUNCAN	Included: <ul style="list-style-type: none"> <li>• General Site Safety Rules</li> </ul> Modified <ul style="list-style-type: none"> <li>• Drug, Alcohol &amp; Smoking Policy</li> <li>• 5.3 Procedure</li> </ul> Withdrew: <ul style="list-style-type: none"> <li>• HSMS2025.1 procedure</li> </ul>



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## 5.1 COMPANY RULES POLICY STATEMENT

Duncor considers the Environment and the Health and Safety of all to be the base upon which all operations are set. Duncor recognizes that all workers have the right to a safe and healthy work environment. With that said, in order to protect the health and safety of Duncor employees, Subcontractors and visitors, Duncor has established both standard company rules and site-specific rules. Duncor Senior Management and Management are committed to ensuring consistent enforcement of rules and standards throughout the organization.

Both sets of rules outline the responsibilities set out for all workplace parties. It is required that all parties review, understand and adhere to these responsibilities.

Duncor shall be responsible for any changes and/or modifications to either set of rules and shall be responsible for communicating these changes to all relevant workplace parties as they may impact the work.

Company rules and site-specific rules will be visibly posted in an accessible location for review and will be enforced consistently throughout the organization. Failure to comply with Duncor's company rules, site-specific rules, and other legal requirements may result in disciplinary action.

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**Brian Duncan, Vice President**  
January 23, 2026



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## 5.2 COMPANY RULES

Duncor has established a set of standard rules which are to be complied with by all Duncor employees, its Subcontractors and visitors. Rules are identified in all policies and procedures throughout this manual. They are, at the very least, fundamental principles that ensure the health and safety of workers in any given workplace.

### PURPOSE

The purpose of this procedure is to outline the responsibilities of each workplace party, as it relates to the setting, implementation and compliance of company rules, policies and procedures.

### SCOPE

This procedure applies to all Duncor employees, contractors and independent operators and visitors.

### ROLES & RESPONSIBILITIES

#### Senior Management / Management

- Establish company rules and site-specific rules to be adhered to by all personnel on Duncor worksites.
- Ensure all established sets of rules are compliant with the Occupational Health and Safety Act and Regulations, other legal requirements and standards.
- Ensure company rules are applied and enforced consistently throughout the organization by abiding company HSMS.
- Ensure evaluations are completed and progressive discipline measures are implemented and enforced in a consistent manner.
- Review company rules and site-specific rules, at least, annually, or as frequently as necessary to include any changes made to the work environment and to ensure currency with legislative requirements.
- Comply with the Occupational Health and Safety Act and all applicable regulations, standards, codes, standard company rules and site-specific rules.
- Additional responsibilities include those that are outlined in Element 1.6 within this manual as it pertains to document and record control.

#### Health & Safety Coordinator/Supervisors / Forepersons

- Ensure all workers comply with the Occupational Health and Safety Act and all applicable regulations, standards, codes and company rules.
- Ensure implementation of company rules through conducting evaluations on a regular basis.
- Ensure written standard company rules and site-specific rules are communicated, visibly posted on the safety board inside site office trailers and made available to workers at an accessible location.
- At the time of worker Orientation, the Health & Safety Coordinator/Supervisor / Foreperson shall review the standard company rules and site-specific rules with the new employee. Rules will be provided in the Orientation presentation and will be presented verbally to ensure that rules are clearly explained in a way that is understood.
- Ensure that Company Rules are communicated to all workers, subcontractors, and visitors during site-specific orientation.
- Comply with the Occupational Health and Safety Act and all applicable regulations, standards, codes, standard company rules and site-specific rules.
- Ensure
- Additional responsibilities include those that are outlined in Element 1.6 within this manual as it pertains to document and record control.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

Workers / Subcontractors / Service Providers

- Comply with the Occupational Health and Safety Act and all applicable regulations, standards, codes, standard company rules and site-specific rules.

Visitors

- Comply with the Occupational Health and Safety Act and all applicable regulations, standards, codes, standard company rules and site-specific rules.

Procedure

- Management will ensure that both standard and site-specific company rules are clearly explained and understood by all employees during Orientation and regularly by ensuring that a written copy of the company rules are provided to each employee during Orientation and uploaded on Safetyloop.

**5.2.1 GENERAL HEAD OFFICE SAFETY RULES**

Employee access to 101 Big Bay Point Road will be via the west gate and parking is along the west fence, starting just inside the gate. Building access will be through door's 1 and 4. Trucks and heavy equipment are to enter/exit through the east gates.

It is essential that all employees:

1. Report all incidents and hazards to a Supervisor immediately.
2. Stay within the building's designated areas. Restricted areas are clearly marked with yellow borders. For safety reasons, only authorized personnel are permitted in the truck servicing area.
3. Are aware of where first aid stations, first aid kits, fire protection equipment, and telephones are located in case of emergency.
  - a. **First Aid** – is located adjacent to the men's washroom. There, you will find a First Aid Kit and an eye wash station. Additional eye wash stations are located in men's washroom and the east area of the main shop.  
All injuries that require supplies from any First Aid Kit must be recorded and a Supervisor should be advised immediately.
  - b. **Fire Protection Equipment** – Fire extinguishers are located at every exit, as well as various locations in the shop and office area. There are two hose stations on the shop floor and one upstairs in the storage room. These are to be used for emergency purposes only, and only by trained personnel.
  - c. **Telephones** – Are located in the office area and downstairs in the Fleet Manager's office. These are to be used in emergencies only, unless authorized by a Supervisor.
4. **Should an evacuation be required, exit the building through the nearest exit, then assemble near door four (4), two (2) so we can ensure everyone is accounted for.**
5. Wear protection footwear. CSA-certified grade 1 work boot must be work beyond the lunchroom area.
6. **Ensure overhead doors are completely open before entering or exiting the shop area.**
7. Persons failing to comply with legislation or applicable standards, policies and procedures will be subject to the Duncor disciplinary policy (see *Element 5.3*).

**5.2.2 GENERAL EMULSION PLANT SAFETY RULES**

Employee and Visitor access to Duncor Enterprises Inc Emulsion Plant at 207-4th Line South in Oro/Medonte will be via the north entrance off Windstar Drive.

It is essential that all Employees and Visitors:

1. Report all incidents and hazards to a Supervisor immediately.
2. Report to the office. For safety reasons, only authorized personnel are permitted in the production facility.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

3. Are aware of where First Aid Stations, First Aid Kits and Fire Protection equipment are located:
  - a. **First Aid Kits** – are located in front of the bathroom and in the office area. All injuries that require supplies from any First Aid Kit must be recorded and a Supervisor must be notified immediately.
  - b. **Eye Wash Station** – is located outside the washroom in the plant area along with a safety shower. An additional eye wash and shower station is located in the loading rack area.
  - c. **Fire Protection Equipment** – (Extinguishers) are located at each exit, as well as at various areas of the plant and office areas.
  - d. **Telephone** – All Supervisors have cellular phones. Landlines are located in the plant and office areas.
4. Wear appropriate PPE; CSA-certified grade 1 work boots must be worn, as well as safety glasses, long sleeve shirts, face shields (while handling chemicals), and ear plugs (while mill is in operation).
5. Persons failing to comply with legislation or applicable standards, policies and procedures will be subject to the Duncor disciplinary policy (see *Element 5.3*).

### 5.2.3 GENERAL QUARRY SAFETY RULES

#### 5.2.3.1 CLARKE QUARRY

Employee and Visitor access to Duncor Enterprises Inc Clarke Quarry at 579 Greer Road, Port Sydney. It is essential that all Employees and Visitors:

1. Report all incidents and hazards to a Supervisor immediately.
2. Report to the scale house. For safety reasons, only authorized personnel are permitted in the quarry.
3. Are aware of where First Aid Stations, First Aid Kits and Fire Protection equipment are located:
  - a. **First Aid Kits** – are located in the scale office, tool trailer, and shop. All injuries that require supplies from any First Aid Kit must be recorded and a Supervisor must be notified immediately.
  - b. **Eye Wash Station** – is located inside the scale house and tool trailer.
  - c. **Fire Protection Equipment** – (Extinguishers) are located at each exit in the scale house, tool trailer, and the shop.
  - d. **Telephone** – All Supervisors have cellular phones. Landlines are located in the scale house.
4. Wear appropriate PPE; CSA-certified grade 1 work boots must be worn, high-visibility vests, hard hats, safety glasses, and hearing protection as required when operating.
5. Persons failing to comply with legislation or applicable standards, policies and procedures will be subject to the Duncor disciplinary policy (see *Element 5.3*).

#### 5.2.3.2 SEQUIN QUARRY

Employee and Visitor access to Duncor's Sequin Quarry 495 Clear Lake Road, Humphrey.

It is essential that all Employees and Visitors:

1. Report all incidents and hazards to a Supervisor immediately.
2. Report to the scale house. For safety reasons, only authorized personnel are permitted in the quarry.
3. Are aware of where First Aid Stations, First Aid Kits and Fire Protection equipment are located:
  - a. **First Aid Kits** – are located in company trucks. All injuries that require supplies from any First Aid Kit must be recorded and a Supervisor must be notified immediately.
  - b. **Fire Protection Equipment** – (Extinguishers) are located in company trucks.
  - c. **Telephone** – All Supervisors have cellular phones.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

4. Wear appropriate PPE; CSA-certified grade 1 work boots must be worn, high-visibility vests, hard hats, safety glasses, and hearing protection as required when operating.
5. Persons failing to comply with legislation or applicable standards, policies and procedures will be subject to the Duncor disciplinary policy (see *Element 5.3*).

### 5.2.4 GENERAL NORTH BAY SHOP SAFETY RULES

Employee access to 67 Gibson St. North Bay will be via the North gate and parking is along the North fence line. Building access will be through the front office door and the North facing side Shop door. Trucks and heavy equipment are also to enter/exit through the North gate.

It is essential that all employees:

1. Report all incidents and hazards to a Supervisor immediately.
2. Stay within the building's designated areas. For safety reasons, only authorized personnel are permitted in the truck servicing area.
3. Are aware of where First Aid Stations, First Aid Kits and Fire Protection equipment are located:
  - a. **First Aid Kits** – are located: (1) on wall in office next to washroom  
(2) in shop, on wall dividing 2 bays  
All injuries that require supplies from any First Aid Kit must be recorded and a Supervisor should be advised immediately.
  - b. **Eye Wash Station** – is located in shop washroom.
  - c. **Fire Protection Equipment** – (Extinguishers) are located at every exit; Front office floor, North-facing shop man door, and West-facing shop man door.
  - d. **Telephone** – Are located in the office area. This phone is to be used in emergencies only unless authorized by a Supervisor.
4. Wear protective foot wear. CSA-certified grade 1 work boot must be work beyond the Shop washroom area.
5. **Ensure overhead doors are completely open before entering or exiting shop area.**
6. Persons failing to comply with legislation or applicable standards, policies and procedures will be subject to the Duncor disciplinary policy (see *Element 5.3*).

### 5.2.6 GENERAL SITE SAFETY RULES

It is essential that all employees:

1. Report all incidents and hazards to a Supervisor immediately.
2. Are aware of where First Aid Stations, First Aid Kits and Fire Protection equipment are listed in the site's PSERP and located:
  - a. **First Aid Kits** – are located: (1) in company vehicles  
All injuries that require supplies from any First Aid Kit must be recorded and a Supervisor should be advised immediately.
  - b. **Eye Wash Station** – is located in service vehicle
  - c. **Fire Protection Equipment** – (Extinguishers) are located in every company vehicle
  - d. **Telephone** – Supervisors are provided with company phones. Use of this phone is to be used in emergencies only unless authorized by a Supervisor.
3. Wear protective footwear. CSA-certified grade 1 work boot must be worn, High Vis, Hard Hats Consistent with O.Reg. 213/91
4. Persons failing to comply with legislation or applicable standards, policies and procedures will be subject to the Duncor disciplinary policy (see *Element 5.3*).



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## **TRAINING**

Company and site-specific rules will be provided to all relevant workplace parties at the time of Orientation.

## **COMMUNICATION**

All employees and subcontractors will be made aware of changes and revisions made to company rules and site-specific rules in consideration of language skills and literacy.

## **RECORDKEEPING**

Any revisions made to the company rules and site-specific orientation shall be kept on file. Any obsolete documents shall be watermarked with "OBSOLETE" to eliminate unintended use. All records and documents are required to be kept and maintained as per Duncor's Document & Record Control System as per Element 1.10 of this manual.

Orientation acknowledgements shall be maintained to represent each worker's acknowledgement and acceptance of the requirement to adhere to company rules, site-specific rules, legislation and other legal requirements.

## **EVALUATION**

This procedure will be evaluated by management on an annual basis and changes will be implemented as required.

## **APPLICABLE LEGISLATION**

- Occupational Health and Safety Act R.S.O. 1990
- Ontario Regulations for Construction Projects, O. Reg. 213/91



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

### 5.3 ACCOUNTABILITY & DISCIPLINARY PROCEDURE

#### OVERVIEW

Without fair and consistent enforcement, policies and procedures can lose their integrity and importance for workers. Workers must understand and accept their responsibilities, and equally understand and accept the requirement for discipline when circumstances that endanger others, property or self may occur.

If a worker chooses to work in an unsafe manner, Supervisors / Forepersons must take reasonable precaution for the circumstances to protect that worker or other individuals that may be affected by the unsafe practice. Reasonable precaution may include reinstruction, retraining, and where required, in the case of willful disregard of Safe Job Procedures, Progressive Disciplinary Action.

Workers should understand that disciplinary action is taken to correct an individual's misconduct. The repetition of similar behaviour can result in discharge.

#### PURPOSE

The purpose of the procedure is to identify the progressive disciplinary actions available for persons in supervisory capacities to use in the case of noncompliance in the workplace.

#### SCOPE

This procedure applies to all Duncor employees, contractors and independent operators.

#### ROLES & RESPONSIBILITIES

##### Senior Management / Management / Supervisor / Foreperson

- Senior Management shall communicate the requirement to comply with all standard company rules, site-specific rules, the Occupational Health & Safety Act and all other legal requirements.
- Senior Management shall ensure that all relevant workplace parties employed by or for Duncor to perform work on behalf of Duncor are aware of the disciplinary action procedure and its applicability to the organization.
- Apply appropriate disciplinary action where situations warrant.
- Allow the worker opportunity to account for his/her actions or inactions.
- Provide the worker with a clear understanding of what is expected.
- Explain how and why the employee has failed to meet the requirements.
- Ensure all workers comply with the Occupational Health and Safety Act and all applicable regulations, standards, codes and company rules.

##### Workers / Subcontractors / Service Providers / Visitors

- Comply with the Occupational Health and Safety Act and all applicable regulations, standards, codes and company rules.
- Understand the disciplinary actions in place to correct an individual's misconduct or seek clarification where necessary.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## PROCEDURE

### Progressive Disciplinary Action

- All new workers are on probation for three months. If there is a cause for disciplinary action during this period, dismissal may result.
- Actions will be taken to impress upon the employee the serious nature of their offence up to and including termination of employment. Each offence will be examined on a case-by-case basis. Dependent on the circumstances, the following progressive disciplinary action will apply:
  - **First Offence:** A verbal warning will be given to the worker and immediate corrective actions must be applied.
  - **Second Offence:** A written notice (Non-Compliance Notice) will be issued to the worker in contravention, and a copy will be maintained by Duncor management. Immediate corrective actions must be applied.
  - **Third Offence:** Worker will be suspended
  - **Fourth Offence:** Worker may be terminated

At the sole discretion of Duncor, the following penalties may be imposed without recourse, against any contractor/independent operator, subcontractor, supplier, their employees or any person that fails or refuses to abide by safety legislation, company or client policies or procedures, or any safe work procedure after the third step of the progressive disciplinary policy.

1. Contractor may be required to immediately remove from the site the contractor/independent operator, sub-contractor, or any employee under their care
2. Termination of contract.
3. Suspension of bidding rights for a period of time.

Duncor has a zero-tolerance policy for actions and circumstances that are immediately dangerous to life and health (IDLH), and such actions may warrant immediate discharge. This includes but is not limited to:

- Buying, selling, using, possessing or being under the influence of unauthorized narcotics
- Drinking alcohol and being intoxicated on workplace property
- Theft
- Violence, such as fighting
- Possession of unauthorized weapons
- Willful damage to property or equipment
- Improper or careless use of equipment/machinery that may endanger the life or health of others or self
- Blatant disregard of supervisors'/foreman's instructions
- Blatant disregard for the health and safety of self or others



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

The Subcontractor, independent operator or visitor will be responsible, financially or otherwise for all costs incurred by Duncor associated with any non-compliance of the contractor or independent operator’s employees, subcontractors, suppliers or other person on the job site for any reason related to the contractor. Costs may include but are not limited to:

1. Any charges, fines and convictions created as a result of the activities of the contractor/independent operator, subcontractor, supplier, worker or visitor.
2. Any, and all costs of defending any actions that result from the employees of any contractor/independent operator, sub-contractor, supplier, worker or visitor.
3. Any, and all costs associated with any delay in the progress of work resulting from non-compliance by the contractor/independent operator, subcontractor, supplier, worker or visitor.
4. Any, and all costs required to perform safety, environmental or quality related testing resulting from non-compliance of any contractor/independent operator, subcontractor, supplier, worker or visitors

While the progressive disciplinary process outlined above provides a general framework for addressing infractions, Duncor reserves the right to bypass one or more steps of the procedure based on the severity of the offense, the circumstances surrounding the incident, or repeated violations of company policies. Each case will be evaluated individually, considering factors such as the nature and potential consequences of the infraction, the worker’s previous record, and any mitigating or aggravating circumstances. This approach ensures fairness and flexibility while maintaining the safety, integrity, and productivity of the workplace.

**TRAINING**

Instruction will be provided to Duncor management as to how and when to apply progressive discipline.

**COMMUNICATION**

All employees and subcontractors will be made aware of the Duncor disciplinary policy upon orientation.

**RECORDKEEPING**

Any disciplinary matters, minutes, investigations and non-compliance notices will be maintained on site by Duncor management.

All records and documents are required to be kept and maintained as per Duncor’s Document & Record Control System as per Element 1.10 of this manual.

**EVALUATION**

This procedure will be evaluated by management on an annual basis and changes will be implemented as required.

**APPLICABLE LEGISLATION**

- Occupational Health and Safety Act R.S.O. 1990
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<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## 5.4 ATTENDANCE POLICY

The purpose of this policy is to establish, for each employee, the requirement that they work all scheduled hours as deemed necessary by his or her position. Duncor places a high value on attendance and punctuality, and expects all employees to arrive at work at the scheduled time of day on each work day. Regular attendance and consistent punctuality are critical to the goals, objectives, effectiveness, and standards of Duncor Enterprises Inc. and its business operations.

Employees who are chronically absent or tardy adversely affect Duncor Enterprises Inc productivity and staff morale, thus diminishing the quality and level of normal business operations. This policy's goal is to address and/or correct absenteeism and attendance issues before they become counterproductive and/or disruptive to Duncor Enterprises Inc.

### GUIDELINES

Duncor Enterprises Inc. considers an employee absent if he or she does not attend work as scheduled, regardless of cause. The primary objectives of this policy are to:

- Reduce instances of unscheduled and/or disruptive absenteeism/attendance, as well as foster responsible leave usage by employees.
- Improve employee morale by reducing the negative effects of absenteeism on employees who perform the duties of their absent colleagues.
- Enhance service to clients and customers by promoting excellence in employee attendance.

### POLICY

Each employee is responsible for notifying his or her supervisor/manager of absence for each day that the absence occurs, regardless of cause. Each employee is also responsible for reporting when he or she is likely to return to work. Absences without excuse will not be tolerated and are subject to progressive corrective action.

Duncor Enterprises Inc. reserves the right to terminate any employee who is absent for two (2) or more consecutive working days without notification.

- An employee who does not intend to report to work because of illness (or any other reason) must notify his or her immediate supervisor as soon as possible. Failure to provide required notification of any absence whatsoever may result in disciplinary action.
- Any employee absent for longer than (3) or more consecutive days must submit a doctor's note stating the nature of the illness and/or medical condition that led to the absence, and whether the employee can perform his/her duties to their full potential. Physical injuries may require a physical examination before returning to work to prevent re-injury and minimize liability to Duncor Enterprises Inc.

Any employee who remains absent for more than five (5) consecutive business days, without excuse or authorization, shall be considered as having abandoned and resigned his or her position.

For absence due to family or spousal death, it will be at the discretion of the employer as to the amount of time given based on the circumstances and whether this time off will be paid leave.



**DUNCOR**  
**ENTERPRISES INC.**

<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

Exceptions to this policy include absence due to jury duty. The law does not require employers to pay your salary during jury duty. If you are required to attend for more than 10 days, you will begin to receive a daily fee starting on the 11th day which is payable to the employee directly from the Ministry of the Attorney General.

At any time, Duncor Enterprises Inc. reserves the right to make exceptions to these rules in extenuating circumstances as the case may be.

Each supervisor is required to maintain their own set of accurate attendance/absenteeism records. Disciplinary action for excessive absenteeism, poor attendance, or other violations of this policy shall be administered accordingly. (*Refer to Element 5.3 of this manual*)



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## 5.5 VACATION POLICY

Duncor Enterprises Inc. understands the importance of personal time off for its employees. Employees are encouraged to use their accrued paid vacation time for rest, relaxation, and personal pursuits. As such, the purpose of this policy is to explain the standards, guidelines, and procedures for paid vacation time for all staff members.

### POLICY

All regular full-time employees are expected to use their allotted vacation time in full every year. Due to the nature of the business, vacations should be taken during their non-peak work season, normally between November to April, unless otherwise authorized.

- If a statutory holiday or a company recognized holiday occurs during an employee's vacation period, the employee will use one day less of vacation pay entitlement.
- Seasonal employees shall receive vacation pay at the rate of four (4) percent of their earnings for the pay period. Entitlement increases will be reviewed in the fifth (5<sup>th</sup>) year of service and increased at the discretion of Duncor Enterprises Inc. Seasonal workers will be paid out their vacation pay on a weekly basis.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 5.6 COMPANY PROVISIONS

### 5.6.1 COMPANY PROVIDED ACCOMMODATIONS

While working away, lodging will be supplied by the company. Employees may be required to share accommodation with fellow employees. Rules of the host are to be respected, and failure to do so may result in disciplinary action by both the host and Duncor. Any charges incurred due to the wrongdoing of an employee will be charged back to the employee found at fault.

### 5.6.2 COMPANY PROVIDED TRANSPORTATION

Company trucks are for company business, not a taxi service. Although some Supervisors allow them to be used for evening (e.g., meals) it is to be considered a privilege, not a right. Misuse will terminate any extracurricular transportation.

### 5.6.3 COMPANY CREDIT CARD

Company credit cards will be issued to users who will ultimately be responsible for the usage of these cards. Company credit cards are intended for Duncor business use only.

1. Employees must sign off that they have received the company credit card. This form will be on record in the employee file.
2. All receipts must be handed in to Head Office.
3. Unit #'s must be noted on all receipts.
4. Cards will not be given to other without the consent of Supervisors.
5. In the event of lost or stolen cards – you must inform your Supervisor **immediately**.

**Violation of this policy can result in disciplinary action up to, and including termination of employment.**



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 5.7 DRUG, ALCOHOL & SMOKING POLICY

### PURPOSE

The purpose of this policy is to outline Duncor’s drug, alcohol & smoking policy and the consequences of not adhering to the policy.

### SCOPE

This policy applies to all employees, subcontractors and visitors of Duncor.

### ROLES & RESPONSIBILITIES

#### Senior Management / Management

- Ensure this policy is completed and implemented.
- Ensure Supervisors / Forepersons are trained on the enforcement of this policy.

#### Supervisors / Forepersons

- Ensure all workers are in compliance with the policy.
- Apply disciplinary action to any workers who are non-compliant with this policy.

#### Workers / Subcontractors / Service Providers / Visitors

- Report to work fit for duty.
- Ensure you are aware of, and in compliance with this policy at all times.
- Report any workers suspected to be in contravention of this policy.

### POLICY

All workers are required to report to work fit for duty. If a worker appears to be unfit to perform his or her duties, report it to the Supervisor / Foreperson immediately. Duncor has a zero-tolerance policy to the prohibited use of alcohol or drugs as per the policy. Any employee or subcontractor that is found to be in noncompliance with this policy will be subject to the Disciplinary Policy up to and including immediate dismissal from the project or termination from the company.

#### Alcohol

The following is prohibited while at Head Office, Company projects or when otherwise conducting work on behalf of the Company:

- Being under the influence of alcohol
- Consuming alcohol
- Distributing or selling alcoholic beverages

#### Medication

All employees are expected to use prescribed and over-the-counter medications as prescribed. The intentional misuse of medications while at Head Office, Company projects or while otherwise conducting work on behalf of the Company is strictly prohibited. Employees are required to discuss with their doctor the medications they are taking and the potential impact on their job duties. Employees are required to inform their Supervisor / Foreperson if the medication may potentially risk their impairment thus becoming a safety hazard. The



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

Supervisor / Foreperson will work the employee to determine the recommended course of action to minimize any risk.

**Other Drugs & Improper Use of Medication**

The following is strictly prohibited while on Company property, Company projects, during working hours or whenever conducting work on behalf of the Company:

- Being impaired by drugs
- Using, possessing, distributing, offering or selling illegal drugs
- Using or possessing prescription medication without a prescription obtained legally
- Distributing, offering or selling prescription medication

**Smoking**

Duncor Enterprises Inc. supports a smoke-free workplace and aims to protect all individuals from the health risks of second-hand smoke and vapor.

Smoking and vaping of any substance, including:

- Tobacco
- E-cigarettes/vapes
- Cannabis (medical or recreational) Is prohibited in:
  - Enclosed or partially enclosed workplaces
  - Company vehicles
  - Entrances, exits, windows, and air intakes
  - Any other areas as required by provincial legislation

**TRAINING/COMMUNICATION**

This policy will be communicated to all employees and subcontractors upon orientation.

**RECORDKEEPING**

A record of all communication will be maintained by Duncor. All records and documents are required to be kept and maintained as per Duncor’s Document & Record Control System as per Element 1.7 of this manual.

**EVALUATION**

The successes and shortfalls of this policy are to be evaluated by management on an annual basis, and changes are to be implemented where required.

**APPLICABLE LEGISLATION**

- Occupational Health and Safety Act R.S.O. 1990
- Ontario Regulations for Construction Projects, O. Reg. 213/91



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## 5.8 AFTER HOURS WORK POLICY

### PURPOSE

The purpose of this procedure is to ensure that there is adequate supervision after hours and preparation in the case of an emergency after hours.

### SCOPE

This procedure applies to all construction projects.

### DEFINITIONS

After Hours Work: Any work taking place outside of the established regular site hours, or without the presence of a Duncor Supervisor / Foreperson on site.

### ROLES & RESPONSIBILITIES

#### Senior Management

- Ensure Management and Supervisors / Foreman are familiar with the requirements within this procedure.

#### Health & Safety Coordinator /Supervisor / Foreperson

- Ensure an After-Hours Work Permit is completed by any contractor that will be working after hours.
- Ensure that provisions have been agreed upon between the Supervisor / Foreperson and contractor for the availability of emergency equipment.

#### Subcontractors / Service Providers

- Obtain an After-Hours Work Permit from the site Supervisor / Foreperson and ensure it is adequately completed and submitted prior to any after-hours work.
- Ensure a competent Supervisor / Foreperson is designated for after-hours work and is present on site during the after-hours work.
- Advise the Duncor site supervisors/foreman if there are any changes to the After-Hours Work Permit or if there are other contractors present on the site immediately.

#### Visitors

- N/A

### PROCEDURE:

After Hours Work is only permitted if the following conditions are met:

1. An "After Hours Work Permit" is filled out by the contractor that will be working after hours and has been approved by the site Supervisor / Foreperson.
2. All workers expected to be on site after hours are employed by the same company.
3. A competent foreman is designated by the contractor and will be present on site during all after hours work.
4. At least one worker on the crew has a valid First Aid Training Certificate.
5. All required emergency equipment is available (e.g., First Aid kits, emergency numbers, emergency response plan, map to hospital, fire extinguishers, etc.).



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

Under no circumstances can there be employees from more than one company on the project during after-hours work unless a Duncor Supervisor / Foreperson is present. After Hours Work is not permitted unless an After-Hours Work Permit has been completed, submitted and approved by the Duncor site Supervisor / Foreperson.

Any contractors working after hours without satisfying the above requirements will be subject to Duncor disciplinary policy.

**COMMUNICATION/TRAINING**

This procedure is to be communicated to all contractors via e-mail, memo, or onsite meetings with Subcontractor / Service Provider Foremen working after hours.

**RECORDKEEPING**

All training records are to be maintained by Duncor. All records and documents are required to be kept and maintained as per Duncor's Document & Record Control System as per Element 1.10 of this manual.

**DOCUMENTATION REQUIRED**

- After Hours Work Permit

**EVALUATION**

This procedure is to be evaluated on an annual basis by management and changes are to be implemented where required.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 5.9 WORKING ALONE POLICY

### OVERVIEW

Working alone is a safety concern, as there are no other individuals readily available to provide assistance in the case of a medical emergency or violence and harassment threat. Adequate planning and preparation are required in the case that an emergency situation may arise while working alone.

### PURPOSE

The purpose of this procedure is to ensure that the health and safety of all workers is protected when working alone.

### SCOPE

This procedure applies to all Duncor employees that may be working alone.

### DEFINITIONS

Working Alone: Working as the only employee of Duncor, in circumstances where assistance is not readily available to the employee in the event of injury, ill health, or another emergency.

### ROLES & RESPONSIBILITIES

#### Senior Management / Management

- Respond to any concerns or issues regarding site or office security.

#### Supervisors / Forepersons

- Ensure all workers are trained on and understand this procedure, prior to working alone.
- Identify and report any concerns regarding building/site security or working alone.
- Respond to any concerns reported by workers regarding building/site security or working alone.

#### Workers

- Ensure you are trained on and understand this procedure prior to working alone.
- Ensure that this procedure is followed when working alone.
- Bring to the attention of your Supervisor / Foreperson any concerns or issues regarding working alone procedures or security.

#### Subcontractors / Service Providers

- Subcontractors will not be permitted to perform work without the supervision of a Duncor Supervisor who is trained in Basics of Supervising.
- Should a Subcontractor be permitted to perform work without a Duncor Supervisor present, they must complete a “Competent Supervisor” form.
- Ensure Supervisors are trained in Basics of Supervising.

#### Visitors

- N/A



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## **PROCEDURE**

- Workers are advised to let a fellow co-worker know when they are planning to work alone, and the approximate time they will be returning. When working alone, all doors to the office shall be kept locked at all times. Only scheduled visitors are permitted to enter the workplace, by appointment only. All other visitors shall be informed the office is closed and to return during regular working hours.
- Adequate communication shall be available to the employee in the office working alone. Landline telephones are available in the office and/or company cell phones are provided to management on site.
- When leaving the office, the worker shall conduct a visual assessment before exiting the office. Workers may look out the window for any hazards that may be a risk to their health and safety. This can include suspicious individuals, vehicles, noises, weather, etc.
- If the worker does not feel safe and/or if there is a potential or actual risk to his/her health and safety, then the worker should follow the emergency response plan.
- High-risk work is not permitted when working alone, workers are permitted to complete administrative tasks only. Duncor labourers and Duncor subcontractors are not permitted to work alone.

## **COMMUNICATION/TRAINING**

- This procedure is to be communicated to all Duncor employees on site.

## **RECORDKEEPING**

- All training records are to be maintained by Duncor. All records and documents are required to be kept and maintained as per Duncor's Document & Record Control System as per Element 1.10 of this manual.

## **EVALUATION**

- This procedure is to be evaluated on an annual basis by management and changes are to be implemented where required.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 5.10 FITNESS FOR DUTY POLICY

### 1. Policy Statement

Duncor recognizes that employees who use or are impaired by drugs or alcohol while performing work endanger not only themselves, but their co-workers and others affected by the work. Duncor policy with regards to such conduct is one of zero tolerance and employees must be aware that any violations they commit may result in disciplinary action up to and including termination.

However, Duncor also recognizes that addiction to drugs or alcohol is a serious health problem. The intent of this Policy is to accomplish the health and safety goal in a manner that is fair, humane and consistent with employees' accommodation rights under discrimination laws. The ultimate goal is not to punish, but to help employees identify and get help for their substance abuse issues so that they can return to work healthy, safe, happy and productive.

### 2. Purpose

The objective of this substance abuse policy is to ensure that all employees report to work fit for duty. Adopting this Policy is a reasonable precaution that Duncor is required to take to protect the health and safety of workers under Section 25(2)(h) of the Ontario *Occupational Health and Safety Act* (OHS Act).

### 3. Scope

This Policy applies to all individuals that work for Duncor including, but not limited to full-time, part-time, temporary and contract employees, independent contractors, volunteers and employees of third-party contractors or subcontractors that Duncor engages to perform work at its facilities and project sites.

#### A) Contractor Employees

This Policy applies to individuals employed by contractors and subcontractors that perform work at Duncor facilities, projects, but is not intended to supersede or circumvent the provisions of any current collective agreements that those contractors or subcontractors have negotiated with their own workers and their unions. In the event of a conflict between this Policy and a contractor employment agreement or collective agreement covering the worker, the latter shall control.

### 4. Definitions

For the purposes of this Policy:

- “**Drugs**” includes:
  - Narcotics and illegal drugs;
  - Marijuana whether used or obtained legally or illegally; and
  - Legal prescription and over-the-counter medications and drugs that cause or have the potential to cause impairment and render an employee not fit for duty.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

- **“Fit for duty”** means a state of physical and mental that allows an individual to perform his or her job duties safely and effectively without impairment due to the use of or after-effects of alcohol, illegal drugs, legal medications or other health conditions.
- **“On duty”** includes reporting for and performing work, including:
  - Scheduled work;
  - Unscheduled call-in work;
  - Work performed on Duncor facilities, projects;
  - Work performed for Duncor away from Company facilities, including but not limited to driving or traveling to and from work.
- **“Safety-sensitive job”** means positions that have a direct and substantial impact on the health and safety of the employee, other workers, customers, visitors, the public, property and/or the environment, including but not limited to those involving driving, operation of machinery or equipment, handling of toxic substances and others determined by Duncor.
- **“Substance abuse”** means the use of alcohol, illegal drugs, legal marijuana and medications and other substances that can impair a person’s judgment, clarity and functioning and render him/her not fit for duty.

## 5. Requirements for Employees

All employees and workers covered by this Policy are required to:

- i. Come to work fit for duty;
- ii. Work safely in accordance with Section 28 of the OHS Act;
- iii. Refrain from using or being impaired by alcohol or drugs while they are on duty;
- iv. Refrain from possessing, purchasing, selling, distributing or engaging in any other conduct involving alcohol or illegal substances or paraphernalia while they are on duty;
- v. Refrain from misusing or being impaired by prescription or non-prescription drugs while they are on duty;
- vi. Notify their Supervisor / Foreperson if they suspect that a co-worker is unfit for duty;

## 6. Legal Marijuana

### A) No Exemption for Legal Marijuana Use

All employees must understand that marijuana is an impairing drug and that using it at work or coming to work high renders them unfit for duty in violation of this Policy. This is true regardless of whether their use of marijuana is legal under federal drug laws.

**Legal marijuana use is not a justification for being unfit for work!**

### B) Employee Duty to Notify

Employees must notify their Supervisor / Foreperson if they are using legally prescribed medical marijuana or other legal prescription and non-prescription drugs that may cause impairment for the treatment of a medical condition. Off-duty and legal use of such drugs does not violate this Policy as long as employees are fit for duty at all times when they are on duty.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## 7. Support for Employees with Substance Abuse Issues

Although Duncor reserves the right to discipline, it also recognizes that addiction and substance abuse is a health problem. Duncor is prepared to help employees get the counselling, treatment, rehabilitation and support they need to overcome those problems.

## 8. Self-Reporting

Duncor strongly encourages employees with substance abuse problems to step forward and request help voluntarily. Employees who do self-report will not be subject to discipline as long as they have complied with their obligation to be fit for duty under this Policy.

## 9. Fitness for Duty Medical Assessments

Employees must undergo medical assessments to ensure they are fit for duty before being placed in a safety-sensitive job. Assessments will address substance abuse and be performed:

- Prior to employment when individuals are applying for safety-sensitive jobs;
- Before current employees are transferred from non-safety-sensitive to safety-sensitive jobs; and
- Periodically for as long as the employee remains in a safety-sensitive job.

Medical assessments will be performed by qualified healthcare professionals following appropriate medical practices and results will be kept confidential to the extent required by personal privacy laws.

## 10. Disciplinary Investigations

Duncor may open a disciplinary investigation to check whether an employee is engaged in substance abuse or otherwise in violation of his/her fitness for duty obligations under this Policy in response to:

- Complaints or concerns by co-workers, Supervisors / Forepersons, etc.;
- Declining performance;
- Erratic behaviour;
- Involvement in safety incidents including near misses;
- Arrests for impaired driving, drug offences and similar violations; and
- Other indications that the employee has substance abuse issues or is otherwise not fit for duty.

Investigations will be carried out in accordance with Duncor Disciplinary Investigation Procedures.

### 1. Privacy

Duncor recognizes that test results and related information is protected personal information under privacy laws and will keep it confidential and secure and refrain from using or disclosing it except as permitted or required by law.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## 2. Consequences of Violations

Violation of this Policy is grounds for discipline up to and including termination in accordance with the Duncor Progressive Discipline Policy. Employees with substance abuse issues on administrative leave may also be referred for counselling or assistance through the Duncor Employee Assistance Program or outside agencies.

## 3. Assistance & Reinstatement

Duncor reserves the right to place employees with substance abuse issues on administrative leave and enter into Last Chance Agreements offering them the opportunity to return to work if they successfully complete the terms of their treatment and rehabilitation program and meet other conditions of reinstatement.

## 4. Employee Right to Accommodations

Duncor recognizes that drug and alcohol addiction is deemed a disability under the Ontario *Human Rights Code*. Accordingly, in administering the disciplinary and other provisions of this Policy, addictions and other substance abuse related to disabilities, such as use of medical marijuana or prescription drugs for chronic pain and debilitating conditions, will be treated as non-culpable violations and employees will be offered reasonable accommodations based on their individual circumstances and capabilities to the point of undue hardship.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## 5.11 CELL PHONE USE POLICY

### POLICY STATEMENT

Duncor recognizes that operations of wireless communication devices while performing work endanger not only themselves, but their co-workers and others affected by the work. Duncor policy with regards to such conduct is one of zero tolerance and employees must be aware that any violations they commit may result in disciplinary action up to and including termination.

However, Duncor also recognizes that cell phones may assist employees with their job and in potential emergency situations. Duncor Management holds workers accountable for responsible use of such devices and prohibits unauthorized operations that compromises safety, the safety of others and compliance with the law.

Duncor expects that employees use cell phones only as permitted by law and/or company policy. Duncor management is responsible for cost monitoring to determine usage monthly. Employees will be held accountable for extra costs incurred due to unauthorized calls and/or personal usage.

Be reminded that the operation of a hand-held device while driving on a public roadway in Ontario is prohibited under the Highway Traffic Act (Ontario). In addition to the information in this policy, employees are responsible for knowing the law and their responsibilities, understanding the application of the law to activities and for compliance with the law.

### PURPOSE

The purpose of this section is to provide direction on the permitted use of wireless communication devices while operating a company motor vehicle or while operating construction equipment, as required under the Highway Traffic Act of Ontario and/or by Duncor Inc., and to provide guidelines on proper cell phone use.

### SCOPE

This policy applies to all individuals that work for Duncor including, but not limited to full-time, part-time, temporary and contract employees, independent contractors, volunteers and employees of third-party contractors or subcontractors that Duncor engages to perform work at its facilities and project sites.

### REQUIREMENTS FOR EMPLOYEES

- Cell phones/ Personal Digital Assistants/Radios/laptop computers shall only be used for purposes of business only and in matters of work assistance.
- Personal usage is prohibited. Employees are expected to observe all instructions respecting permitted uses and requirements for use.
- Employees shall maintain compliance with the company policy and the law (Highway Traffic Act of Ontario).
- Observe good cell phone etiquette.

#### Restrictions on Cell Phones

- Employees shall not operate a cell phone/smartphone or PDA while driving on a roadway open to the public, unless they are operating the device using a hands-free headset or other hands-free mechanisms.
- If employees receive a call on their cell phone/smartphone/PDA and a hands-free device is unavailable for use, the employee shall let the call go to voicemail.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

- Employees shall refrain from answering the call until they are safely pulled over and the vehicle has come to a full stop.

Restrictions on laptop computers/dvd display screens

- Employees shall not use a laptop computer or view a display screen on a laptop/dvd display screen while driving on a public highway or while driving within a private area of the construction zone.

Prohibition of operating devices while on construction equipment and/or machinery

- UNDER NO CIRCUMSTANCES ARE EMPLOYEES PERMITTED TO OPERATE A CELL PHONE/SMARTPHONE/PDA WHILE OPERATING ANY TYPE OF MACHINERY OR CONSTRUCTION EQUIPMENT, WHETHER IN THE FIELD OR ON THE ROAD.
- ENSURE THAT THE DEVICE IS TURNED OFF WHILE ENGAGED IN THE OPERATIONS OF ANY CONSTRUCTION EQUIPMENT AND/OR MACHINERY.

Cell phone etiquette

- Observance of good cell phone etiquette is required at all times while conducting business.
- If in a meeting with others, cell phones/smartphones shall be turned off or set on vibrate mode.
- Employees shall not show disrespect by taking phone calls while in a meeting.
- If the phone call is absolutely necessary, advise meeting members in advance that the phone call requires attending to. Keep the call as brief as possible.
- Cellular transmissions can be intercepted and are not confidential. Accordingly, do not engage in confidential or information sensitive discussion via cell phone.
- Above all, employees are required to show consideration of others.

**REPORTING**

Employees are responsible for any tickets that are given for traffic offenses relating to the use of cell phones, smartphones, PDAs, radios, other wireless communication devices, and any other prohibited activities while driving a company motor vehicle.

Upon receipt of a ticket, summon/charge notice, or any other such notice issued, the employee shall immediately report the matter to their Supervisor / Foreperson.

**RETURNING OF EQUIPMENT**

Employees are required to return their equipment to Duncor Head Office or to their Manager/company representative when their employment with Duncor ends or at any time asked to do so.

Employees are also required to return their equipment if they are laid off. Such devices may not be reissued upon recall to work.

Questions regarding this policy and its restrictions/limitations of company issued wireless communication devices shall be directed to the Supervisor / Foreperson.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
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SUPERSEDES	HSMS2025.1

## 5.12 DRIVER SAFETY

### PURPOSE

Duncor recognizes that employees may, from time to time, be required to use and operate company vehicles. This policy outlines Duncor's rules regarding driver safety to ensure the health and safety of our employees and other's. The purpose of this section is to describe the minimum condition and requirements for the permitted, safe and proper operation and use of a Duncor company vehicle.

### SCOPE

This policy applies to all individuals that work for Duncor including, but not limited to full-time, part-time, temporary and contract employees, independent contractors, volunteers and employees of third-party contractors or subcontractors that Duncor engages to perform work at its facilities and project sites.

### REQUIREMENTS FOR EMPLOYEES

The employee will comply with the company **Health and Safety Program Manual** in accordance to operation of company vehicles and will not operate any vehicle for which they do not possess a current and valid license, and will also comply with the following:

- All drivers are responsible for ensuring that they are in possession of a valid driver's licence. A copy of the licence must be submitted at the time of hire along with an updated abstract for truck driver positions.
- Drivers who operate vehicles on company business are representing Duncor Enterprises Inc. and are personally responsible for driving in a safe and legal manner. All local, provincial, and federal regulations and proper procedures must be followed. Consideration must be shown for the rights of pedestrians, cyclists and other drivers.
- No driver may operate a vehicle while impaired by the influence of alcohol, drugs or medicine, excessive fatigue or extreme stress.
- All drivers must immediately report and document accidents, damage, problems or concerns to the supervisor within 24 hours.
- Each driver must wear a seat belt and shoulder harness while operating a vehicle. The driver is responsible for ensuring that seat belts are worn by all passengers in the vehicle.
- No worker shall ride in the back of a truck or in any vehicle that does not have a seat belt. The vehicle must have enough seats and seat belts equal to the number of workers being transported.
- Drivers must not exceed the posted speed limit. Speed should be adjusted depending upon adverse road and/or weather conditions to ensure that control of the vehicle is maintained, and that the vehicle can be safely stopped.
- Responsibility for parking and/or speeding tickets will be the sole responsibility of the driver. Also, any vehicle infraction or ticket issued for any other reasons will be subject to review and if the driver is found at fault, will be the responsibility of that employee for payment.
- It is the responsibility of the driver to maintain a valid licence. If, at any time during active employment the employee's licence is suspended for any reason, they shall contact their supervisor and cease operating any company vehicle until further notice.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

### 5.13 COMPANY CREDIT CARD USE

Company credit cards will be issued to users who will be ultimately responsible for the usage of these cards. Company credit cards are intended for Duncor Enterprises Inc. business use only.

1. Employees must sign off that they have received the company credit card. This form will be on record in the employee file.
2. All receipts must be handed in to the Head Office.
3. Unit #'s must be noted on all receipts.
4. Cards will not be given to others without the consent of Supervisors.
5. In the event of lost or stolen cards – you must inform your Supervisor **immediately**.

**Violation of this policy can result in disciplinary action up to and including termination of employment.**



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## ELEMENT 6: PERSONAL PROTECTIVE EQUIPMENT

REVISION LOG				
YEAR.REV #	REVISED BY	DATE REVISED	APPROVED BY	DESCRIPTION OF CHANGES
2021.1	J. LASTNAME	MM.DD.YYYY	MR. PRESIDENT	<ul style="list-style-type: none"> <li>• X</li> <li>• Y</li> <li>• Z</li> </ul>
2022.1	KELCIE STEVENSON	01.2022	BRIAN DUNCAN	<ul style="list-style-type: none"> <li>• HSMS2022.1 SUPERSEDED BY HSMS2023.1</li> </ul>
2023.1	KELCIE STEVENSON	01.25.2023	BRIAN DUNCAN	Included: <ul style="list-style-type: none"> <li>• Roles and Responsibilities for all relevant workplace parties</li> <li>• PPE Policy Statements</li> <li>• Relevant CSA Standards</li> <li>• PPE Program – See Appendix B</li> </ul> Withdrew: <ul style="list-style-type: none"> <li>• HSMS2022.1 procedure</li> </ul>
2024.1	KELCIE STEVENSON	01.24.2024	BRIAN DUNCAN	Modified: <ul style="list-style-type: none"> <li>• PPE procedure</li> </ul> Withdrew: <ul style="list-style-type: none"> <li>• HSMS2023.1 procedure</li> </ul>
2025.1	KELCIE STEVENSON	01.22.2025	BRIAN DUNCAN	Modified: <ul style="list-style-type: none"> <li>• PPE procedure</li> </ul> Withdrew: <ul style="list-style-type: none"> <li>• HSMS2024.1 procedure</li> </ul>
2026.1	KELCIE STEVENSON	01.23.2026	BRIAN DUNCAN	Withdrew: <ul style="list-style-type: none"> <li>• HSMS2025.1 procedure</li> </ul>



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 6.1 PERSONAL PROTECTIVE EQUIPMENT POLICY STATEMENT

Duncor Senior Management is fully committed to providing a healthy and safe work environment for its employees, subcontractors, service providers and visitors. In demonstration of our commitment to continuously improve our HSMS, the following will be observed and practiced by the company and employees when the company undertakes any job or contract.

### MANDATORY POLICY/ Construction & Quarry

- All employees will wear CSA Grade 1 safety boots, long trousers, sleeved shirts, CSA-approved Type 1 or 2, Class E or equivalent hard hats, for the jobsite or Quarry.
- Hi-Vis vest or garment must be worn. Such apparel must meet either; CSA-Z96.1-8 or S.69.1 from O.Reg.213/91.
- Site Specific requirements may meet or exceed these requirements from time to time. In cases where we are working for a general contractor, we will adhere to the most stringent PPE requirements.

### MANDATORY POLICY/ Shop

- All employees will wear CSA Grade 1 safety boots, long trousers, sleeved shirts, CSA-approved hard hats appropriate to the circumstances when working inside the shop, for the construction jobsite a CSA Type 1 or 2, Class E or equivalent.
- Supplemental: When working in close proximity to moving vehicles a Hi-Vis vest or garment must be worn. Such apparel must meet either; CSA-Z96.1-8 or S.69.1 from O.Reg.213/91.

### GENERAL POLICY/ Rules

- Office staff, guests and visitors may wear CSA-approved safety glasses, CSA Grade 1 safety boots, long trousers, sleeved shirts, CSA-approved Type 1 or 2, Class E or equivalent hard hats, and any other specialty PPE required for the jobsite and/or work location.
- All PPE used by this company will be within the requirements of Occupational Health and Safety legislation.
- All PPE used by this company will be maintained in accordance with manufacturer's instructions and requirements.
- Site Specific requirements may meet or exceed these requirements from time to time. In cases where we are working for a general contractor their policy if greater than ours may supersede ours and must be adhered to in these conditions.
- Company-issued PPE will be inspected visually at the time of issue and before each use by the employee.
- All PPE that is damaged, or in need of service or repair will be removed from service immediately. This equipment may be tagged or destroyed depending on the circumstances.
- All PPE that has been removed from service and is tagged "OUT OF SERVICE." Or "Do Not Use/ Damaged or Defective" will not be returned to service until repaired and or inspected by a qualified person.
- No piece of PPE will be modified or changed contrary to manufacturer's instructions or specifications or Occupational Health and Safety legislation. Only in occasions where s.3 of the O. Reg. 213/91 has been utilized that this section may contradict.

Failure to adhere to Company policies and procedures, the Occupational Health and Safety Act and Regulations, and other legal requirements and standards may result in disciplinary action.

**Brian Duncan, Vice President**

January 23, 2026



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 6.2 PERSONAL PROTECTIVE EQUIPMENT

### OVERVIEW

The hazards associated with certain work tasks and environments have the ability to cause injury or illness to the worker. Personal protective equipment (PPE) is designed to prevent or lessen the potential harmful effects that the worker may endure.

### PURPOSE

The purpose of this procedure is to ensure that harmful effects resulting from exposure to hazards in the workplace are eliminated or reduced with the use of PPE.

### SCOPE

This program applies to all employees and subcontractors of Duncor.

### ROLES & RESPONSIBILITIES

#### Employer / Senior Management / Management

- Wear/use all PPE when required and as directed.
- Provide the required PPE suitable for the hazards of each job task or working environment.
- Provide training regarding the use, care, inspection and storage of all required PPE.
- Ensure training records regarding the use, care, inspection and storage of PPE are maintained and available.
- Replace any inadequate PPE immediately.
- Ensure all manufacturer's guidelines and instructions are available for worker review for all PPE in use on site.
- Ensure all activities requiring PPE are documented in the HRA, SWPs and SJPs.
- Senior Management / Employer shall ensure other Management employees, Supervisors / Forepersons use required PPE.
- Ensure PPE is readily available to workers.

#### Supervisors / Forepersons

- Wear/use all PPE when required and as directed.
- Ensure all workers, Subcontractors and visitors are wearing PPE as required and using PPE as trained and according to manufacturer's guidelines.
- Recognize situations where workers are required to use PPE and ensure it is being used.
- Ensure all specialized PPE is inspected prior to use and according to manufacturer's instructions and legislative requirements and are documented using the corresponding forms.
- Supervisors / Forepersons shall ensure all Duncor employees, Subcontractors, service providers and visitors use PPE as required.
- Ensure PPE is readily available to workers.

#### Worker / Subcontractors / Service Providers

- Wear/use all PPE when required and as directed.
- Attend all required training sessions regarding the use, care, inspection and storage of PPE.
- Inspect all PPE prior to use and according to manufacturer's instructions and record on the corresponding form specific to the PPE being used.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

Visitors

- Wear/use all PPE when required and as directed.

**PROCEDURE**

All workers will be made aware of general site PPE requirements during site orientations. Duncor Senior Management/Management will ensure activities requiring PPE will be documented and identified through Hazard Assessments, Safe Work Practices (SWPs), Safe Job Procedures (SJPs), Safety Data Sheets (SDS's), training sessions (WHMIS, Working at Heights, Traffic Control, Propane Handling, etc.), Toolbox Talks, etc. Senior Management/ Management will ensure that PPE meets specific criteria through a review of the Occupational Health and Safety Act, its regulations, legislative requirements, and CSA standards. This review will occur during the Annual Management Review at a minimum. Appendix B: Personal Protective Equipment: Selection, Fit, Use and Care Guide will outline the criteria to select PPE. All workers will be trained during Orientation and through Toolbox Talks throughout the year.

All Duncor employees, Subcontractors and its employees, suppliers of service and visitors must adhere to all applicable PPE requirements while on a job site. All PPE must be worn according to manufacturer's guidelines and any applicable laws, regulations and standards. All PPE must be inspected and maintained as per legislative requirements and manufacturer's instructions.

**Head Protection:**

- Minimum standard CSA Z94.1 approved only
- To be worn by all workers at all times on the project, no exception.
- Duncor is responsible for supplying workers with head protection.
- Daily visual inspection is required, and will be documented in the JHA.

**Foot Protection:**

- Minimum standard CSA Z195-09/Green Patch approved only
- To be worn by all workers at all times on the project, no exception.
- Employees are responsible for providing their own adequate foot protection.
- Daily visual inspection is required, and will be documented in the JHA.

**Fall Protection:**

- Minimum standard CSA Z259.17-16 approved only, to be worn by workers at all times when exposed to an open edge or opening of 8 feet (2.4 meters) or greater. Exception: Workers that remain on the ground level and will knowingly not be exposed to a fall of greater than 8 feet (2.4 meters).
- The employer is responsible for providing fall protection equipment.
- Fall protection equipment must be used according to manufacturer's instructions and must be appropriate for the situation in which it is used.
- The inspection must be documented on the Fall Protection Inspection checklist prior to use.
- Pre-use inspection is required and shall be documented in the Fall Protection PPE Pre-Use Inspection form.

**Hi-Visibility Safety Vests:**

- Minimum standard CSA Z96 approved only, to be used by workers at all times when in any areas where workers are operating or may be exposed to moving equipment or vehicles, or when acting as a traffic control person, no exceptions.
- The employer is responsible for providing high visibility safety vests.
- Daily visual inspection is required and will be documented in the JHA.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

**Eye Protection:**

- Minimum standard CSA Z94.3-07 approved only, to be worn by workers when the task may expose the worker to an eye injury.
- Eye protection must be used according to manufacturer’s guidelines.
- The employer is responsible for providing eye protection as needed.
- All workers outside of the yellow safety lines in the shop area MUST wear certified eye protection.
- Daily visual inspection is required and will be documented in the JHA.

**Hearing Protection:**

- Minimum standard CSA Z94.2.02 approved only, must be worn if the workers are exposed to noise exceeding 85dBA or using equipment where manufacturer requirements recommend hearing protection.
- Hearing protection must be used according to manufacturer’s guidelines.
- The employer is responsible for providing hearing protection as required.
- Visual pre-use inspection is required and will be documented in the JHA.

**Respiratory Protection:**

- Minimum standard, CSA Z 94.4-18 approved only, must be worn if the workers are exposed to a high dust or otherwise harmful atmosphere.
- The type of respiratory protection must be appropriately selected for the hazards in which the worker will be exposed and must be used according to manufacturer’s guidelines.
- SDSs must be consulted to determine the type of respiratory equipment required.
- The employer is responsible for providing respiratory protection as required.
- The inspection must be documented on the Respirator Inspection checklist prior to use.

**Hand/ Body Protection:**

- Minimum standard, CSA approved only, must be worn where the worker is exposed to hazards that may injure, burn, etc. the hands or body.
- The employer is responsible for providing hand and body protection as required.
- Visual pre-use inspection is required and will be documented in the JHA.

Senior Management shall ensure workers are made aware of PPE requirements associated with assigned tasks. The HRA, SWPs and SJPs are documents that are developed and reviewed by Senior Management and provides workers with a reference point to determine the most appropriate PPE to select and required to perform each task safely.

Management and Supervisors / Forepersons will ensure that appropriate PPE is made available to workers by maintaining an adequate supply in Supervisor / Foreperson trucks and/or the office trailer. Management and Supervisors / Forepersons will continually monitor the work activities and site conditions to determine whether additional PPE is to be provided for specific activities and in situations where new hazards have a potential to arise.

**TRAINING**

Duncor Management shall ensure all workers are provided with PPE training and made aware of the proper fitting of PPE, the use, storage, handling, cleaning and limitations of the PPE they are required to use prior to its first use. Training in WHMIS, Working at Heights, Traffic Control, Propane / Natural Gas Handling, etc. identifies these PPE requirements and is mandatory for all workers partaking in the type of work identified.

**COMMUNICATION**

This procedure and all PPE requirements of the worksite will be communicated to workers during orientation. All



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

workers will be instructed as to where and how to obtain PPE provided by the employer and requirements regarding specialized PPE will be communicated to workers through Safe Job Procedures, Toolbox Talks or other training sessions, as required.

Duncor Management shall ensure all workers are made aware of written rules and/or guidelines pertaining to the proper fitting, care and use of PPE, which shall be communicated at the Corporate Orientation and shall be kept in a conspicuous location.

## **RECORDKEEPING**

Records of all training regarding PPE and the use and maintenance thereof will be maintained on site for each worker by Duncor management.

All activities requiring PPE shall be documented and located in the HRA.

All records and documents are required to be kept and maintained as per Duncor's Document & Record Control System as per Element 1.10 of this manual.

## **DOCUMENTATION REQUIRED**

- JHA
- Fall Protection Equipment Inspection Form
- Respirator Inspection Form

## **EVALUATION**

This procedure will be evaluated by management on an annual basis and changes will be implemented as required.

## **APPLICABLE LEGISLATION**

- Occupational Health and Safety Act R.S.O. 1990
- Ontario Regulations for Construction Projects, O. Reg. 213/91



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## ELEMENT 7: PREVENTATIVE MAINTENANCE

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2021.1	J. LASTNAME	MM.DD.YYYY	MR. PRESIDENT	<ul style="list-style-type: none"> <li>• X</li> <li>• Y</li> <li>• Z</li> </ul>
2022.1	KELCIE STEVENSON	01.2022	BRIAN DUNCAN	<ul style="list-style-type: none"> <li>• HSMS2022.1 SUPERSEDED BY HSMS2023.1</li> </ul>
2023.1	KELCIE STEVENSON	01.25.2023	BRIAN DUNCAN	Included: <ul style="list-style-type: none"> <li>• Roles and Responsibilities for all relevant workplace parties</li> <li>• Preventative Maintenance Policy Statements</li> <li>• Asset list procedure</li> <li>• Flow chart for providing maintenance or service to owned assets</li> <li>• Flow chart for providing maintenance or service to rented / leased assets</li> </ul> Withdrew: <ul style="list-style-type: none"> <li>• HSMS2022.1 procedure</li> </ul>
2024.1	KELCIE STEVENSON	01.24.2024	BRIAN DUNCAN	Modified: <ul style="list-style-type: none"> <li>• Performing maintenance procedure</li> </ul> Withdrew: <ul style="list-style-type: none"> <li>• HSMS 2023.1 procedure</li> </ul> Included: <ul style="list-style-type: none"> <li>• Subsection 7.2.3 Electronic Logging Device</li> </ul>
2025.1	KELCIE STEVENSON	01.22.2025	BRIAN DUNCAN	Withdrew: <ul style="list-style-type: none"> <li>• HSMS 2024.1 procedure</li> </ul>
2026.1	KELCIE STEVENSON	01.23.2026	BRIAN DUNCAN	Withdrew: <ul style="list-style-type: none"> <li>• HSMS 2025.1 procedure</li> </ul>



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 7.1 PREVENTATIVE MAINTENANCE POLICY STATEMENT

Duncor Senior Management is committed to providing all workers a safe and healthy work environment and considers the Environment and the Health and Safety of all to be the base upon which all operations are set. Duncor recognizes that all workers have the right to a safe and healthy work environment.

For Duncor to successfully provide a safe and healthy work environment, a preventative maintenance program has been established and shall be implemented to promote the maintenance of tools, equipment, and vehicles.

Preventative maintenance is defined as the systematic care and protection of tools, equipment, machines and vehicles. Ensuring that such items are in a state of good repair and remain in good working condition, we effectively reduce the risk of injuries to our employees, our Subcontractors, and visitors.

Routine inspections, testing and replacement or repair contribute to the preservation of tools, equipment and vehicles. Therefore, it is imperative that pre-use inspections are conducted as frequently as per legislative and manufacturer requirements for preventative maintenance.

All heavy trucks and trailers owned and operated by Duncor Enterprises Inc. will be inspected, serviced and maintained in accordance with performance standards set out in the Highway Traffic Act Regulations 199/07, 587, and 611.

Trucks will be inspected and maintained every 10,000 km, 300 hrs, or monthly, (whichever comes first), and shall consist of alternating an "A" (Dry) Service and a "B" (Wet) Service.

Trailers will be inspected and maintained every three months.

This procedure will outline key roles and their associated responsibilities in our preventative maintenance program. Duncor Senior Management believes that all workplace parties have a responsibility to contribute to the health and wellbeing of workplace safety and is committed to taking all actions necessary to ensure all relevant workplace parties are protected from the hazards and risk associated with using equipment, tools and machinery. This can be achieved through completing inspections, ensuring proper documentation of relevant information and proper communication.

Duncor Senior Management is committed to the implementation and constant improvement of this preventative maintenance system through, but not limited to a series of checklists/heavy equipment/vehicle maintenance records.

**Brian Duncan, Vice President**  
January 23, 2026



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 7.2 PREVENTATIVE MAINTENANCE

### PURPOSE

The purpose of this procedure is to ensure that all tools and equipment are maintained according to regulatory requirements and manufacturer’s instructions.

### SCOPE

This procedure applies to all tools and equipment that will be used by Duncor.

### DEFINITIONS

Competent Person: A competent individual is someone who is qualified to perform a certain job or task due to his/her knowledge, training and experience.

Equipment: For the purpose of this procedure, “equipment” includes all equipment, tools, machinery, vehicles, PPE, facilities, etc.

### ROLES AND RESPONSIBILITIES

#### Senior Management

- Responsible for approving the purchase, lease or renting of all equipment.
- Ensure all equipment meets legislative, manufacturer and industry requirements. All equipment shall be use as intended.
- Designate a management employee to maintain the equipment inventory / asset list by project.
- Designate a management employee to be responsible for responding to notification from the electronic records system and rectifying equipment that are damaged, identified with deficiencies or are overdue for service.
- Ensure designated management employees have developed preventative maintenance schedules as per manufacturer specifications.
- Maintain a list of company assets, whether owned, leased or rented.

#### Management / Supervisors / Forepersons

- Provide and maintain an inventory list of all Duncor equipment on the project, whether owned, leased or rented.
- Ensure all equipment is inspected as per regulatory requirements and/or manufacturer’s instructions.
- Ensure workers and operators complete the pre-use inspection prior to operation and document the inspection of the corresponding form.
- Ensure all equipment, whether owned, leased or rented that are identified with deficiencies are documented on the pre-use inspection sheet.
- Ensure corrective and/or preventative actions are also documented on the corresponding pre-use inspection form.
- Tag and put out of service all equipment that is damaged, defective, and/or overdue for service and ensure arrangements are made for replacement or repair.
- Respond to the notification from the electronic records system. Ensure equipment is tagged out of service and sent for repair as appropriate.
- Maintain a record of all maintenance conducted on equipment.
- Ensure competent individual performs required inspections and maintenance, as required.
- Ensure all manufacturers’ manuals are available for all equipment greater than 10hp on a project.
- Ensure all service providers are competent as per section 4.2 Procurement of Contractor Management.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

Workers

- Inspect all equipment you have been instructed to inspect.
- Ensure you are competent to inspection equipment.
- Use all equipment according to manufacturer’s guidelines/instructions and according to regulatory requirements.
- Complete a pre-use inspection and document the results on the corresponding inspection form.
- Report any defects or damages to your Supervisor / Foreperson immediately.

Subcontractors / Service Providers

- Ensure all equipment in your care on site is inspected prior to each use.
- Maintain documented copies of all inspections on site and make available to Duncor management for review upon request.
- Ensure all damaged, defective, and equipment overdue for maintenance are immediately put out of service and replaced or repaired.
- Ensure all manufacturers’ manuals are available for all equipment on the project.

Visitors

- N/A

**PROCEDURE**

**Inventory List**

An inventory list of all Duncor owned, leased, and rented equipment must be maintained. Items to be include in the inventory may include, but are not limited to:

- Company Ladders
- Scaffold Systems
- Heavy Mobile Equipment
- Company Vehicles
- Any item over 10 hp

<b>COMPANY ASSET LIST</b>		
<b>VEHICLE ASSET LIST</b>	<b>EQUIPMENT ASSET LIST</b>	<b>TOOL ASSET LIST</b>
<ul style="list-style-type: none"> <li>• Make</li> <li>• Model</li> <li>• Serial Number</li> <li>• Date of Manufacture</li> <li>• Person Assigned to Vehicle</li> </ul>	<ul style="list-style-type: none"> <li>• Make</li> <li>• Model</li> <li>• Serial Number</li> <li>• Date of Manufacture</li> <li>• Site Assigned</li> </ul>	<ul style="list-style-type: none"> <li>• Make</li> <li>• Model</li> <li>• Serial Number</li> <li>• Date of Manufacture</li> <li>• Site Assigned</li> </ul>



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

### **Maintenance Schedules**

Duncor Management shall ensure use of a preventative maintenance schedule that meets manufacturer's guidelines or regulatory requirements. This maintenance schedule is required to be followed and documented for all equipment. If equipment is rented, Duncor must ensure the rented equipment is maintained as required.

The Supervisor / Foreperson shall periodically refer to the maintenance schedule of all tools/equipment on site that require maintenance. Once maintenance has been completed, the Supervisor / Foreperson shall ensure the return date has been recorded and documents the next scheduled maintenance.

### **Performing Maintenance**

Only an individual deemed competent according to regulations, standards, guidelines or manufacturer's instructions may inspect and perform maintenance. The Health and Safety Coordinator will track, monitor and document competencies for workers performing inspections and maintenance following the procedure in Element 8.1.2.

All mechanically powered equipment rated at greater than 10 horsepower shall be inspected by a competent worker prior to use and documented on the corresponding pre-use inspection form and on an annual basis thereafter (or more frequently if required by manufacturers' instructions) to determine whether they can handle their rated capacity and to identify any defects or hazardous conditions.

### **Identification of Deficiencies**

Any, and all overdue or defective equipment, tools, facilities and vehicles shall be immediately locked-out/tagged-out of service and assigned with a corrective action plan. Deficiencies shall be documented in the pre-use inspection form.

The Health & Safety Coordinator and Management will be notified of any damages / deficiencies and shall ensure appropriate action is taken to rectify the issue.

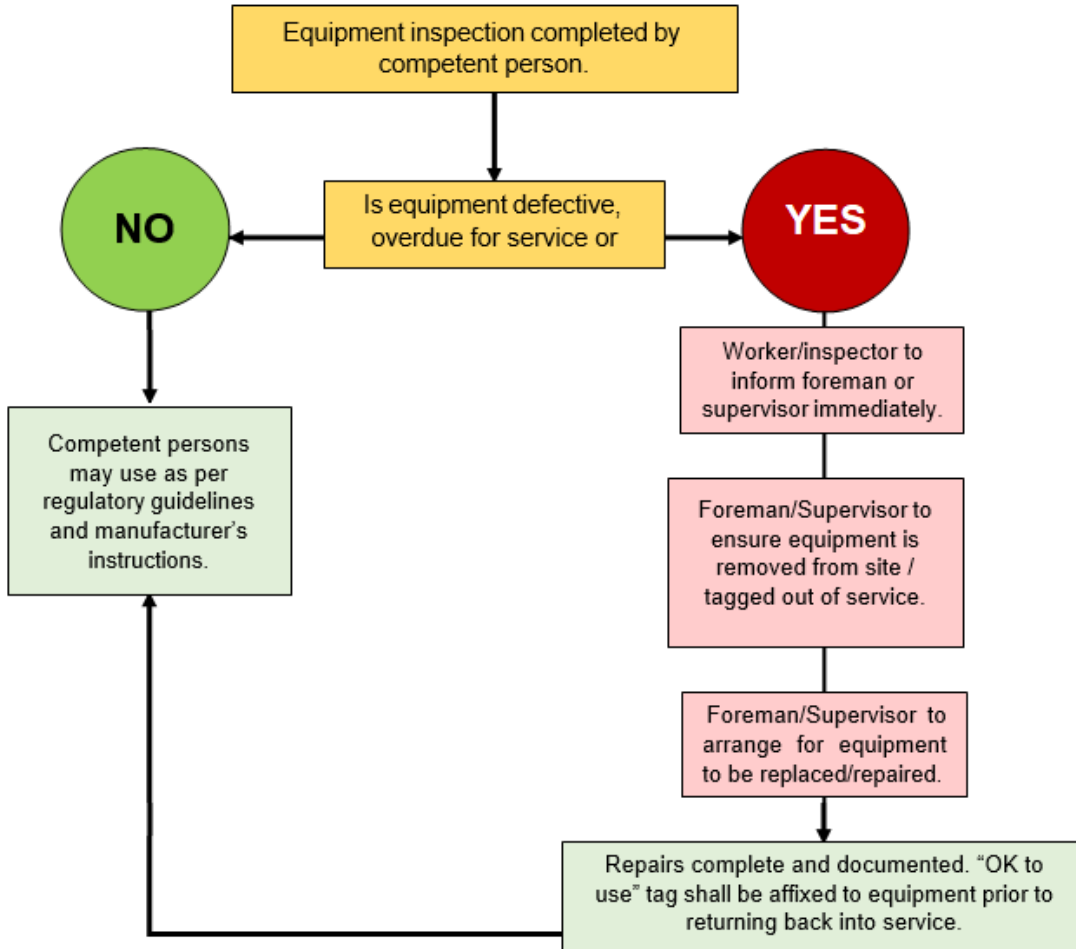
### **Post Servicing/Maintenance**

All equipment, tools, and vehicles may only be returned to service if manufacturer specifications are met.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

The following flow chart illustrates the procedure for a defective, overdue for service, or damaged piece of equipment:

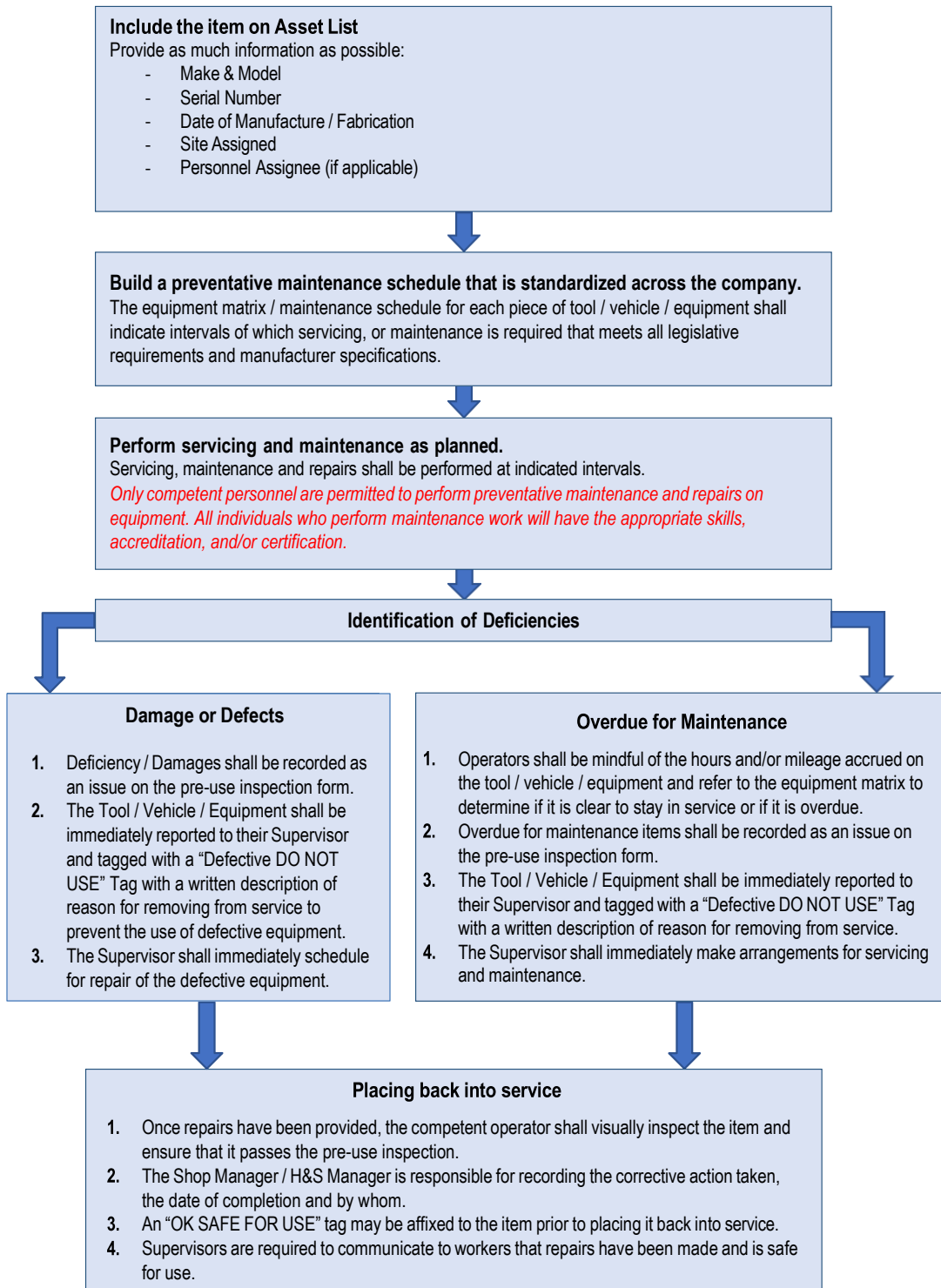


Passed Inspection	Defective Equipment / Tools



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

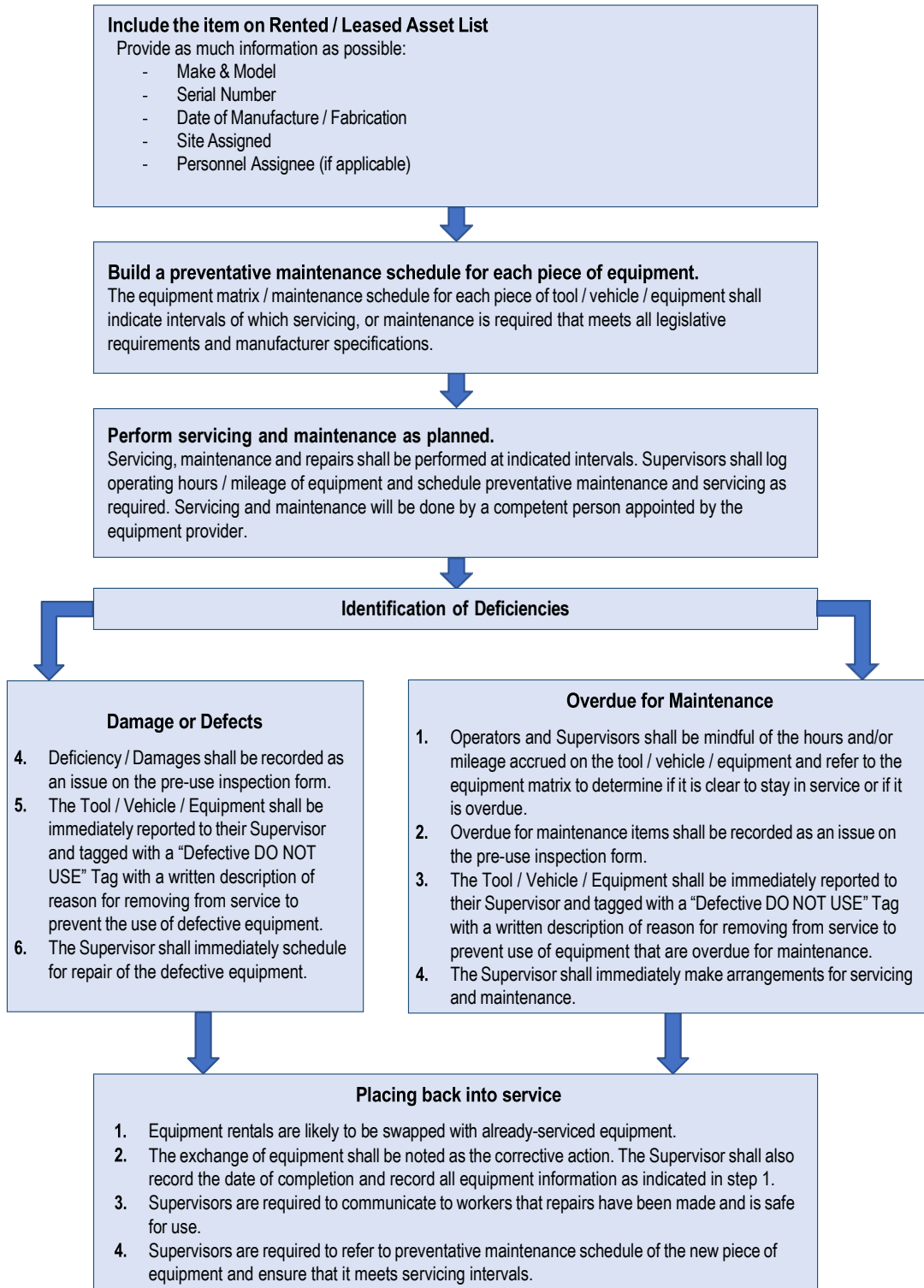
## 7.2.1 PROCEDURE FOR OWNED EQUIPMENT / VEHICLES / TOOLS





<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## 7.2.2 PROCEDURE FOR RENTED / LEASED EQUIPMENT / VEHICLES / TOOLS





<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## **TRAINING**

All workers required to use or inspect equipment will be trained as per regulatory requirements and manufacturer's instructions. Only competent persons are permitted to use and inspect equipment.

## **COMMUNICATION**

This procedure will be communicated to all site employees and contractors upon site orientation.

## **RECORDKEEPING**

An inventory of all Duncor equipment will be maintained on site or at head office. A record of any inspections, maintenance, corrective actions, and follow-ups are to be maintained on site. All corrective actions must be documented on the form in which the deficiency was identified along with the date in which the tool / equipment / vehicle was repaired and tagged-in for service.

All records and documents are required to be kept and maintained as per Duncor's Document & Record Control System as per Element 1.10 of this manual.

## **DOCUMENTATION REQUIRED**

- Equipment Matrix
- Equipment Inspection Forms
- Defective Tags
- Lock-Out / Tag-Out Tags

## **EVALUATION**

This procedure will be evaluated by management on an annual basis and changes will be implemented as required.

## **APPLICABLE LEGISLATION**

- Occupational Health and Safety Act R.S.O. 1990
- Ontario Regulations for Construction Projects, O. Reg. 213/91



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 7.2.3 ELECTRONIC LOGGING DEVICE PROCEDURE

### OVERVIEW

It is required that all qualifying commercial motor vehicle drivers use an Electronic Logging Device (ELD), which is a tamper-resistant device that automatically records driving time by syncing with the vehicle's engine, making it easier to maintain a driver's hours of service (HOS) and record of duty status (RODS), also known as daily logs.

### SCOPE

This procedure applies to all Duncor employees driving and operating all commercial motor vehicles leased, rented, or owned and operated by Duncor.

### DEFINITIONS

Commercial Motor Vehicle: a truck with a Register Gross Vehicle Weight (RGVW) in excess of 4,500 kg.

### APPLICATIONS

Big Roads is the ELD system installed in the trucks recording the driver's HOS and RODS.

Fleet Complete is the service provider for the FC Inspect app and complying with the Schedule 1 regulations.

FC Inspect is the app where drivers fill out their pre and post inspections for Commercial Vehicle Operator's Registration (CVOR) tracks.

### PROCEDURE

#### Duty Status

1. Off-duty time, other than time spent in a sleeper berth.
2. Off-duty time spent in a sleeper berth.
3. On-duty time spent driving.
4. On-duty time, other than time spend driving.

On-duty activities include driving, as well as performing any other activities for the operator, such as inspecting, cleaning, or repairing your vehicle; travelling as a co-driver (not including when in sleeper berth); loading and unloading the vehicle; waiting at inspections for unloading or loading to be completed, or because of an unforeseen occurrence such as an accident.

#### Hours of Service Requirement

##### 1. Daily Requirement

- A driver must have 10 hours off-duty in a day.
- A driver cannot drive more than 13 hours in a day.
- A driver cannot drive after 14 hours on-duty in a day.

##### 2. Mandatory Off-Duty Time

- After a period of at least eight hours off-duty, a driver cannot drive more than 13 hours.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

- After a period of at least eight hours off-duty, a driver cannot drive after having been on-duty for 14 hours.
- After a period of at least eight hours off-duty, a driver cannot drive after 16 hours has elapsed.

### 3. Cycle Requirement

- An operator shall designate a cycle for the driver to follow.
- There are two cycles available, a seven-day cycle or a 14-day cycle.
- In a period of seven consecutive days, a driver cannot drive after having been on-duty for 70 hours.
- In a period of 14 consecutive days, a driver cannot drive after having been on-duty for 120 hours. Drivers following this cycle shall not drive after accumulating 70 hours on-duty without having taken 24 consecutive hours of off-duty time.
- On any day, all drivers must have a period of at least 24 consecutive hours off-duty in the preceding 14 days.

### 4. Cycle Reset/Switching

- A driver may only switch the cycle they are on if they start a new cycle.
- To start a new cycle, a driver on the seven-day cycle must take 36 consecutive hours off-duty.
- To start a new cycle, a driver on the 14-day cycle must take 72 consecutive hours off-duty.

## COMMUNICATION

This procedure will be communicated to all site employees and contractors upon site orientation.

## RECORDKEEPING

An inventory of all Duncor commercial motor vehicles will be maintained at head office. A record of any inspections, maintenance, corrective actions, and follow-ups are to be maintained at head office. All corrective actions must be documented on the form in which the deficiency was identified along with the date the commercial motor vehicle was repaired and tagged-in for service.

All records and documents are required to be kept and maintained as per Duncor's Document & Record Control System as per Element 1.10 of this manual.

## DOCUMENTATION REQUIRED

- Hours of Service
- Record of Duty Status

## EVALUATION

This procedure will be evaluated by management on an annual basis and changes will be implemented as required.

## APPLICABLE LEGISLATION

- Highway Traffic Act, R.S.O. 1990, c. H.8 and its applicable regulations



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, VICE PRESIDENT
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## ELEMENT 8: TRAINING & COMMUNICATION

REVISION LOG				
YEAR.REV #	REVISED BY	DATE REVISED	APPROVED BY	DESCRIPTION OF CHANGES
2021.1	J. LASTNAME	MM.DD.YYYY	MR. PRESIDENT	<ul style="list-style-type: none"> <li>• X</li> <li>• Y</li> <li>• Z</li> </ul>
2022.1	KELCIE STEVENSON	01.2022	BRIAN DUNCAN	<ul style="list-style-type: none"> <li>• HSMS2022.1 SUPERSEDED BY HSMS2023.1</li> </ul>
2023.1	KELCIE STEVENSON	01.25.2023	BRIAN DUNCAN	<p>Included:</p> <ul style="list-style-type: none"> <li>• Roles and Responsibilities for all relevant workplace parties</li> <li>• Training Policy Statement</li> <li>• Communication Policy Statement</li> <li>• Administration and management of training procedure</li> <li>• Table 1 indicating training and competencies required from each relevant party</li> <li>• Communication requirements from internal and external parties</li> </ul> <p>Withdrew:</p> <ul style="list-style-type: none"> <li>• HSMS2022.1 procedure</li> </ul>
2024.1	KELCIE STEVENSON	01.24.2024	BRIAN DUNCAN	<p>Modified:</p> <ul style="list-style-type: none"> <li>• Competency of in-house trainers</li> <li>• Determination of OHS training needs</li> <li>• Requirement of training prior to worker performing task</li> <li>• Administration and management of training procedure.</li> </ul> <p>Withdrew:</p> <ul style="list-style-type: none"> <li>• HSMS2023.1 procedure</li> </ul>
2025.1	KELCIE STEVENSON	01.22.2025	BRIAN DUNCAN	<p>Modified:</p> <ul style="list-style-type: none"> <li>• Competency/Training Matrix</li> <li>• Training needs analysis</li> <li>• Communication procedure</li> </ul> <p>Withdrew:</p> <ul style="list-style-type: none"> <li>• HSMS2024.1 procedure</li> </ul>
2026.1	KELCIE STEVENSON	01.21.2026	BRIAN DUNCAN	<p>Included:</p> <ul style="list-style-type: none"> <li>• Common Core Training Policy &amp; Procedure</li> </ul> <p>Withdrew:</p> <ul style="list-style-type: none"> <li>• HSMS2025.1 procedure</li> </ul>



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## 8.1 TRAINING POLICY STATEMENT

Duncor considers the Environment and the Health and Safety of all to be the base upon which all operations are set. Duncor recognizes that all workers have the right to a safe and healthy work environment.

Duncor Senior Management believes that training, education and attitude are key fundamentals of workplace health and safety awareness and culture within Duncor. Our Health and Safety Training Program supports continuous learning and awareness for Managers, Supervisors / Forepersons and employees. Duncor Senior Management is committed to ensuring that each and every employee meets their specific health and safety training requirements. Duncor monitors all training programs using a training matrix to track renewals, requirements, and schedules and records all completed training.

All workers employed by Duncor are required to hold valid training certificates or records of training to ensure their competency prior to completing general or specific tasks.

While task-specific training sessions offer program-specific knowledge to workers, Duncor is also engaged in providing further training via communications on a scheduled and on an as-needed basis. Communications include our Corporate Orientation, our Site-Specific Orientation, Toolbox Talks and in everyday dialogue between Supervisors / Forepersons and workers.

All Duncor employees, Subcontractors and visitors are required to hold mandated training qualifications and are required to attend the Orientation session prior to commencing work on site.

The Health and Safety Training Program outlines the procedure to be followed, key roles and their responsibilities.

**Brian Duncan, Vice President**  
January 23 2026



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 8.2 SAFETY EDUCATION & TRAINING

### OVERVIEW

Ongoing training and education programs will be used to ensure that the management staff and workers receive the most up to date training information and any newly developed programs/procedures. This ongoing training and education will enhance Duncor safety knowledge to both support the Continuous Improvement Program.

### PURPOSE

The purpose of this program is to ensure that all workers receive information and instruction as to how to perform work in a safe and competent manner.

### SCOPE

This program applies to all workers of Duncor.

### ROLE & RESPONSIBILITIES

#### Employer / Senior Management

- Ensure a training needs analysis is created at start up and revised as required.
- Provide information, instruction and supervision to a worker as required.
- Provide any training programs for employees, where required.
- Ensure that a worker who is employed to perform a skill that is part of the Apprenticeship and Certification Act or the Trades Qualification and Apprenticeship Act is authorized to perform that skill.
- Ensure the administration and management of the training procedure is implemented.

#### Health & Safety Coordinator

- Lead or assist completion of a training needs analysis prior to start up.
- Maintain the Duncor Training Matrix, identify any expiring or expired training and record accordingly.
- Liaise with Duncor H&S Representative to schedule outstanding or upcoming training for Duncor employees.
- Ensure administration and management of training procedure.
- Determine whether in-house or external training is required.
- If conducted by an in-house trainer, ensure it is being conducted by a competent person.
- Coordinate methods of training that suits different levels of responsibilities, abilities, language skills and literacy.
- Review legislated and task-specific training requirements.
- Ensure information is translated to workers with language barriers and is verbalized for workers with literacy barriers.

#### Supervisors / Forepersons

- Provide a worker with training or written instruction for specific hazardous tasks.
- Visually observe workers to determine if additional training is required.
- Provide training to workers of SWPs and SJPs via toolbox talks.
- Provide training prior to workers performing relevant tasks.
- Ensure all workers have the ability to perform the task prior to commencing work through evaluations (e.g. observations)



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

Workers / Subcontractors / Service Providers

- Attend and participate in all required training provided by the employer, Health & Safety Coordinator or Supervisor / Foreperson.
- Follow proper procedures as indicated in training programs attended.
- Ensure that all employees, including employees under their control (subcontractors and independent operators) have adequate training.
- Unless otherwise authorized, will not perform a skill that requires qualification under the Apprenticeship and Certification Act. These include but are not limited to:
  - Electricians

Visitors

- Attend the site-specific orientation.

**PROCEDURE**

Duncor Standard:

- All Duncor employees shall be trained in:
  - Duncor’s Health & Safety Management System
  - The purpose of our HSMS and the importance of workers’ participation
  - The importance of conformity from all workplace parties
  - Employer and employee rights
  - Roles and responsibilities
  - Legal requirements, standards and codes
  - The importance of conformity
  - Potential consequences for deviations or noncompliance
  - Progressive disciplinary action for noncompliance
- All workers on a construction project are to have valid WHMIS and Health & Safety Awareness training.
- All Supervisors / Forepersons and workers on a construction project will receive Working at Heights, WHMIS, Health & Safety Awareness training and Basics of Supervising.
- All workers must receive specific training applicable to their job task (e.g., Propane Handling, Working at Heights, Traffic Control, Confined Space Entry, etc.).
- All training/education is to be provided, as required, prior to the worker performing the relevant task.
- Duncor shall ensure use and ongoing maintenance of a training matrix.
  - The Duncor Training Matrix will track all Duncor training and identify any expiring/expired training requiring review
  - Refer to the Duncor Training Matrix for complete list of training requirements.

**8.2.1 Administration and Management of Training**

**Training Needs Analysis**

When determining health and safety training needs, Duncor Employer / Management will identify core competencies for each task/role by completing a training needs analysis. OHS training needs will be determined as part of the annual training review corresponding to the identified required competencies for each task/role. This could include information obtained by the following methods:



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

- A training needs analysis
- Reviewing legislative and other training requirements
- Taking into consideration the different levels of responsibilities, abilities, language skills and literacy of its employees.
- Including company specific information on Duncor’s Health & Safety Management System including purpose, roles, responsibilities and rights, importance of conformity, potential consequences for deviations or noncompliance and importance of workers’ participation within the OHS Management System
- Review of recent project hazard assessments;
- Observation of individual employee’s performance to determine if refresher training is required;
- At the supervisor’s/foreman’s request;
- Review of incident reports and incident trend analysis;
- Current or short-term project requirements;
- Provincial requirements;
- Client recommendations.

Once training needs have been identified, the Health & Safety Coordinator will identify how training requirements will be met (e.g., training subject, method of delivery, instructor, schedule). Documentation of training received will be filed with the employees’ training records at Head Office and recorded on the training matrix on SafetyLoop. Training will be tracked through the training matrix and additional/refresher training scheduled as necessary by the Health and Safety Coordinator to ensure training is updated as required.

### Schedule Training

Once a training need has been identified, Duncor’s Health & Safety Coordinator will assess the following:

- Location of training;
- Numbers of employees to be trained;
- Training subject;
- Internal/external training availability.

Duncor’s Health & Safety Coordinator will confirm the training delivery method, coordinates and confirms training dates with the training provider and communicates these details to the Supervisor / Foreperson.

All employees will receive training at the start of their employment at the Annual Orientation, prior to performing the relevant task and ongoing training to meet legislative requirements. The Health and Safety Coordinator in consultation with Senior Management will schedule training, including Orientation, as required and maintain records of training to ensure that recertification and additional training is provided if necessary.

### Training Delivery

#### In-House Training

Senior Management and the Health and Safety Coordinator are responsible for ensuring that all workers are trained by competent worker. The Health and Safety Coordinator will ensure that in-house trainers have the required train-the-trainer certificate if legislatively required. All records of training will be reviewed and maintained by the Health and Safety to ensure competency of trainers. At a minimum during the Annual Management Review the competency of trainers will be reviewed, and training needs analysis performed to ensure in-house trainers have the required competencies.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

Duncor Employer/Health & Safety Coordinator shall ensure the following for the in-house training delivery method:

- Training may only be delivered by a competent person.
  - **“Competent Person”** is a defined term under the OSHA as a person who:
    - (a) is qualified because of knowledge, training and experience to organize the work and its performance,
    - (b) is familiar with the Act 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.
- The in-house training program and/or the use of external training resources satisfies the objectives of training.
- CPO-Approved programs may only be delivered by competent individuals who are certified trainers/instructors in order to meet the minimum requirements set by the MLITSD
- A record of training shall be retained.

External Training

When required, external training will be sourced. The Employer/Health & Safety Coordinator shall ensure training is delivered by an accredited provider and that certificates/ proof of completion are received and copies are retained.

**Evaluation of Learning**

Evaluations for in-house training may be given to attendees, depending on the material delivered. Evaluations may determine whether the attendee is considered competent to perform the task. Duncor management/Supervisors / Forepersons may determine worker competency using the following methods:

- Conducting observation audits which will be documented in the Weekly Supervisor Workplace Inspection Forms.
- Assessment of additional training needs during an incident investigation which may be determined during interviewing personnel involved.

External training sources often provide knowledge evaluations at the end of the course. Workers shall provide Duncor with a valid training card prior to starting a specific task.

In-field competency assessments to ensure that workers are capable of performing their assigned tasks safely and in accordance with company procedures and regulatory requirements. These assessments verify practical skills, confirm understanding of hazard controls, and identify any need for additional training.

**Retention of Records**

All health and safety training including orientations shall be documented in Duncor’s training matrix immediately after training has been completed. Up-to-date records include:

- Name of trainee;
- Date training was conducted;
- Trainer’s name and company/agency;
- Training subject;
- Copy of certificate/wallet card.

Record of Training attendance list for in-house seminars must also be retained.

A training matrix will be readily available for all workers on the Duncor server with copies of training certificates to indicate competency / awareness to perform relevant tasks. The Health & Safety Coordinator will ensure that the information in the training matrix and associated documentation are present and up-to-date. A training needs analysis will occur at a minimum annually, or as required through reviewing the training matrix on SafetyLoop and training records to identify the need for additional or refresher training prior to expiration. Management



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, VICE PRESIDENT
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

meeting minutes will document any required training based on the analysis. Training will be scheduled accordingly, following the Schedule of Training by the Health and Safety Coordinator.

Table 1: All training that is identified as training for all workers and/or supervisors are considered the basic minimum required competencies for each task/role. Basic minimum competency training must be completed before starting work including all the legislative training requirements.

**TABLE 1**

<b>POSTION (LEVEL OF RESPONSIBILITY)</b>	<b>TRAINING/ REQUIRED COMPETENCY</b>
WORKERS	<ul style="list-style-type: none"> <li>• Annual Corporate Orientation</li> <li>• Health and Safety Awareness (4 steps)</li> <li>• AODA</li> <li>• Site Specific Orientation-PSERP review</li> <li>• WHMIS</li> <li>• Working at Heights*</li> <li>• Fire Extinguisher*</li> <li>• JHSC*</li> <li>• First Aid/ CPR*</li> <li>• Hazard Awareness</li> <li>• Confined Space Awareness*</li> <li>• Propane*</li> <li>• PEWP*</li> <li>• Train the Trainer*</li> <li>• Traffic Control*</li> <li>• TDG*</li> <li>• Operator Competency for Specific Equipment used**</li> <li>• Common Core Modular Training for Specific Equipment Used*</li> </ul>
SUPERVISORS/MANAGERS	<ul style="list-style-type: none"> <li>• Annual Corporate orientation</li> <li>• Health and Safety Awareness (5 steps)</li> <li>• AODA</li> <li>• Site Specific Orientation-PSERP review</li> <li>• WHMIS</li> <li>• Working at Heights*</li> <li>• Fire Extinguisher*</li> <li>• JHSC*</li> <li>• First Aid/ CPR*</li> <li>• Hazard Awareness</li> <li>• Confined Space Awareness*</li> <li>• Propane*</li> <li>• PEWP*</li> <li>• Train the Trainer*</li> <li>• TDG*</li> <li>• OTM Book 7</li> <li>• Incident Investigation*</li> <li>• Supervisor Training (Basics of Supervision, Common Core for the Generic Supervisor</li> <li>• Operator Competency for Specific Equipment used**</li> </ul>
SUBTRADE	<ul style="list-style-type: none"> <li>• Site Specific Orientation-PSERP review</li> <li>• WHMIS</li> <li>• Working at Heights*</li> </ul>
VISITORS	<ul style="list-style-type: none"> <li>• Site Specific Orientation-PSERP review</li> <li>• Hazard Awareness</li> </ul>

\*Training required for personnel expected to perform this type of task only

\*\*Competency required for specific equipment used



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## **TRAINING/COMMUNICATION**

These requirements of this program will be communicated to all employees, including site construction personnel, during orientation.

## **RECORDKEEPING**

Workers are required to keep valid records of training on their person at all times.

Worker training qualifications must be submitted to the Health & Safety Coordinator for record retention in Duncor training matrix

All records and documents are required to be kept and maintained as per Duncor's Document & Record Control System as per Element 1.10 of this manual.

## **DOCUMENTS REQUIRED**

- Toolbox Talks Form
- Health & Safety Meeting Minutes
- Duncor Training Matrix
- Operation of Powered Mobile Equipment Competency Checklist
- Copies of employees training certificates / cards if training is provided by an external party (ROTs)
- Surface Miner Modular Program #

## **EVALUATION**

This procedure will be evaluated by management on an annual basis and changes will be implemented as required.

## **APPLICABLE LEGISLATION**

- Occupational Health and Safety Act R.S.O. 1990
- Ontario Regulations for Construction Projects, O. Reg. 213/91
- Workplace Hazardous Material Information System as found in Hazardous Products Act and the Hazardous Information Review Act
- Training Programs O. Reg. 780/94
- Trades Qualification and Apprenticeship Act, O. Reg. 76/05
- Apprenticeship & Certification Act 1998, O. Reg. 572/99



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## 8.2.2 COMMON CORE TRAINING

### Surface Miner Modular Program #770210 & Common Core for the Generic Supervisor Program # 770141

#### OVERVIEW

All employees must complete required Surface Miner Common Core Training within the designated timeframes. Regular audits will be conducted to verify compliance and assess training efficacy.

1. Common Core for Surface Miner (Program #770210).
2. Common Core for the Generic Supervisor (Program # 770141).

#### PURPOSE

This policy establishes a framework for auditing the organization's Surface Miner Common Core Training programs to ensure compliance, effectiveness, consistency, and continuous improvement in employee development and regulatory adherence.

#### SCOPE

This policy applies to all employees, contractors, and relevant stakeholders who are required to complete Common Core Training as defined by organizational, legal, or industry standards.

#### ROLES & RESPONSIBILITIES

##### Employer / Senior Management/ Health and Safety Coordinator

- Create, develop and provide a Surface Miner Common Core Training Program
- Ensure a competent individual delivers both internal/ external training
- Ensure information is translated to workers with language barriers and is verbalized for workers with literacy barriers.
- Ensure new/existing employees or employees with less experience receive appropriate training prior to starting tasks.
- Assist in the performance of an annual audit.

##### Signing Authority

- Annual audit to evaluate the effectiveness and compliance of Ministry Signing Authority Guidelines
- Determines, for accreditation, the company employees who have demonstrated competency in the training modules as outlined in the MTCU Training Standard.
- Signs training module reports and maintains training records for the company employees.
- Ensures and maintains quality training for company employees.
- Evaluates/audits trainers at least once a year.
- Signs and submits original training reports and training applications to the local Employment Ontario office.
- Informs the local Employment Ontario office of any changes to the trainer/training agency.
- Ensures company employees are trained to work in compliance with the Occupational Health and Safety Act (OHSA) and related legislations including Employment Standards.

##### Trainers

- Certified and accredited in the Program Common Core and in any specialty module(s) he/she will be instructing in the Program; Complete a Train-the-Trainer Program;
- Trained in the company standards;
- Prepare lesson plans and outline course materials to be used

##### Supervisors / Forepersons

- Ensure workers are trained and competent in the equipment they operate.
- Ensure worker health and safety concerns are communicated to Senior Management in a timely manner



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

Workers

- Attend and participate in the training
- Ensure a clear understanding of topics discussed and seek clarification when required.
- Know where to locate additional information

**PROCEDURE**

**Administration and Management of Training**

Modular Training Standards will conform to Surface Miner Program #770210 to meet legislative training requirements and will include any changing technology. All training will adhere to the procedure in Element 8.2 Safety Education and Training including how the training will be administered and managed and the requirement to conduct a training needs analysis to determine training requirements for new workers and change of role workers. To ensure training accommodates diverse learner needs and complies with legislative and employer standards, the following strategies will be employed if required:

Needs Assessment

- Prior to training delivery, assessments will be conducted to identify learner requirements related to language proficiency, literacy, skills, and accessibility.

Customized Training Materials

- Training content will be adapted as needed to ensure comprehension, including the use of plain language, visual aids, translated materials, or alternative formats (e.g. large print).

Inclusive Delivery Methods

- A variety of training methods (e.g., in-person, online, hands-on, or one-on-one instruction) will be used to match different learning styles and abilities.

Regulatory and Policy Alignment

- Training content will incorporate all relevant sections of the OHSA, associated regulations, and any employer-specific health and safety policies or procedures.

Qualified Instructors

- Instructors and facilitators will be trained to recognize and support diverse learner needs and to deliver content in an inclusive and accessible manner.

Evaluation and Feedback

- Training effectiveness will be evaluated through operator competency, and observation. Adjustments will be made as needed to improve accessibility and compliance. The Signing Authority to evaluate the quality of the program at a minimum annually.

The following training will be required for new workers and workers who change roles within the company who work at Duncor’s Pit and Quarries and perform the related:

- The Common Core Mandatory Surface Miner #770210
- The Common Core for Generic First Line Supervisor #770141

**If applicable, within 12 months of operating equipment Specialty Modules shall be completed for the work performed outlined in the Modular Training Standards.**



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## Training Delivery

### In-House Training

Signing Authority, and Senior Management are responsible for ensuring that all workers are trained by competent worker. The Signing Authority will ensure that in-house trainers have the required train-the-trainer certificate. All records of training will be reviewed and maintained by the Health and Safety to ensure competency of trainers. At a minimum during the Annual Audit the competency of trainers will be reviewed, and training needs analysis performed to ensure in-house trainers have the required competencies.

### External Training

When required, external training will be sourced. The Employer/Signing Authority shall ensure training is delivered by an accredited provider and that certificates/ proof of completion are received and copies are retained.

### Registration with the Ministry:

- The Signing Authority submits training reports for all completed U-Modules and applications to the local Apprenticeship office of the MLITSD.
- This registration process formally recognizes the worker's accreditation in the Common Core program.
- The Signing Authority maintains records of the training from the Ministry and can be called upon to provide evidence of its adequacy

## Annual Audit

The company signing authority shall perform an annual audit to evaluate the effectiveness and compliance with respect to the Ministry of Training, Colleges and Universities (MTCU) Signing Authority Guidelines. The audit shall be performed by the company signing authority who is, designated by their employer and authorized by MTCU, to be accountable for the quality of training, maintenance of training records and determining the competency of company employees for modular accreditation.

The audit will include:

- Annually auditing trainers/instructors to determine their effectiveness and compliance with standards for safety, quality and performance
- Evaluating the quality of lesson plans
- Observing the trainers'/instructors' teaching techniques for the four (4) basic criteria:
  1. Learning
  2. Behaviour
  3. Delivery
  4. Evaluation
- Auditing trainee performance, including "hands on" approach.

## Trainee Assessment & Evaluation

The trainee(s) has the prerequisite accreditations in the Basic Common Core and specialties for the task being trained.

- The trainee(s) has been authorized to operate equipment and perform the task for which he / she is being trained.
- The trainee(s) works in compliance with the OHSA, the Regulations and company standards.
- The trainee(s) can perform the initial check of equipment and / or tools by means of a show and tell demonstration.
- The trainee(s) can perform and be accredited in the task being assigned.
- The trainee(s) feels comfortable with the training received.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

- The trainee(s) continues to work efficiently without additional coaching by the trainer.
- The trainee(s) demonstrates confidence and the ability to work safely without the trainer's assistance.
- Records of evaluations of learning objectives will be maintained.

### **Continuous Improvement**

The audit will identify any opportunities for improvement determined to improve the quality control of the program. A corrective action plan will be developed for identified OFIs and shall be communicated to relevant workplace parties. Any changes will adhere to Element 14.4 Management of Change Policy and Procedure of this manual.

### **COMMUNICATION**

The results of the audit will be communicated to site senior management, appropriate workplace parties and be documented on Management Meetings.

Relevant versions of applicable documents and records shall be maintained physically and electronically.

### **RECORDKEEPING**

Duncor Health & Safety Coordinator shall ensure maintenance of H&S documentation and training records maintained as per Duncor's Document & Record Control System as per Element 1.10 of this manual.

All records of training will be managed internally will conform to Element 8.2 Safety Education and Training of this manual. Records of modular training will be registered with the MTCU by Senior Management. Employers will maintain records from Ministry. Annual audits are required to be maintained for a minimum of 7 years.

### **DOCUMENTS REQUIRED**

- WSN Signing Authority Audit Tool
- Modular Training Standards
- Modular Training Report
- Operator Competency

### **EVALUATION**

The training program will be administered to meet current legislative requirements. This program will be evaluated at a minimum annually, or as required to reflect changes in legislation, regulation or organizational practices including OHSA, its regulations, employer standards.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 8.3 NEW WORKER / RETURNING WORKER ORIENTATION

### OVERVIEW

Orientations allow workers to better identify hazardous or problematic areas prior to an incident taking place, report them to supervisory personnel and have all issues rectified in a timely and safe manner. Providing workers with an orientation prior to the commencement of work will allow the workers to be acquainted with company and site-specific rules and procedures.

### PURPOSE

The purpose of the Worker Orientation program is to ensure that all workers are familiarized with the workplace and its specific hazards and the Duncor Health & Safety Management Program.

### SCOPE

This program applies to all new workers, returning workers and for workers with a change of role. Duncor Corporate Orientation and/or Site-Specific orientation is mandatory for any personnel who will be present on a Duncor jobsite and/or will be engaged in performing work.

### ROLES & RESPONSIBILITIES

#### Employer / Senior Management / Health & Safety Coordinator

- Create, develop and provide an orientation program.
- Ensure a competent individual delivers the orientation.
- Ensure minimum training requirements are met prior to starting work.

#### Health & Safety Coordinator / Supervisors / Forepersons

- Ensure all workers receive an orientation prior to the start of work.
- Review and identify site-specific hazards and controls, health and safety procedures, and training requirements applicable to the worker.
- Ensure workers / subcontractors / service providers / visitors (when required) are trained in the PSERP. All person(s) trained in the PSERP will sign the acknowledgement form to verify their training.
- Explain all policies, procedures and tasks and ensure an understanding from all workers.
- Record all site-specific orientation in the corresponding form.
- Ensure records are maintained as per Element 1.7 Document & Record Control.

#### New / Returning / Change-of-Position Workers

- Complete the Duncor Corporate Health & Safety Orientation.
- Complete the site-specific orientation.
- Ask any questions requiring clarification.
- Allow facilitator to verify record of training.

#### Subcontractors / Service Providers

- Attend the Site-Specific Orientation prior to commencing work on site.
- Complete and submit the subcontractor Check-in form on the first day at site prior to starting work
- Ask any questions requiring clarification.
- Allow facilitator to verify record of training.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

### Visitors

- Attend the Site-Specific Orientation & Specific Guidelines: Visitor upon your first visit to site.
- Ask any questions requiring clarification.
- Allow facilitator to verify record of training.
- Ensure you sign-in at the site or supervisor office upon each subsequent visit.
- Ensure you are with your approved representative at all times.

### **DEFINITIONS**

Corporate Health & Safety Orientation: Duncor’s health and safety orientation targeted for Duncor’s new employees upon on boarding.

Worker: Any individual participating in work for the first time for the company or for the first time on a site.

Site-Specific Orientation: Health & Safety Orientation designed for all workers on site.

### **PROCEDURE**

#### **Corporate Health & Safety Orientation**

All new Duncor employees are required to participate in the Corporate Worker Health & Safety Orientation upon the start of work with Duncor.

Duncor’s Corporate Orientation will be conducted by an externally sourced training provider and/or the H&S Manager. Annually, all employees including Senior Management shall participate in renewing their Corporate Orientation training.

The minimum requirements for the orientation are:

- Review of Duncor’s Health & Safety System (HSMS)
- Review of Duncor’s Company-Specific Rules
- Review of Company Policy Statements
- Roles and Responsibilities
- Communications / Procedures
- Disciplinary Action
- Emergency Response Plans and Procedures
- Hazard Reporting Requirements
- Incident Investigations and Reporting
- First Aid
- Safe Work Practices
- General Standard Procedures
- The importance of conformity, potential consequences for deviations or noncompliance
- The importance of workers’ participation within the OHSS
- Company Objectives and Action Plans



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

### Site-Specific Orientation

All workers and visitors on site are required to participate in the Site-Specific Orientation prior to commencing work on each Duncor site (crew).

The minimum requirements for the orientation are:

- Specific training for the type of work
- Review of the HSMS
- Review of Duncor Company-Specific Rules and Site-Specific Rules (if applicable)
- Review of Duncor’s Policy Statements
- Roles and Responsibilities
- Communications
- Disciplinary Action
- Site-Specific Emergency Response Plans and Contacts
- Hazard Reporting
- Incident Investigations and Reporting
- First Aid Location and First Aiders
- Safe Work Practices
- General Standard Procedures
- The importance of conformity, potential consequences for deviations or noncompliance
- The importance of workers’ participation within the OHSS
- Documentation frequencies and requirements
- Hygiene facilities
- Traffic Control Plan (determined by the General Contractor)

Worker record of training will be verified upon site-specific orientation. Workers that do not present valid proof of training will not be permitted on site.

Duncor management/Supervisor / Foreperson will continuously monitor worker practice to evaluate their learning of the concepts outlined within our Orientations to determine whether additional training is required.

### Visitors Orientation

All Visitors are required to undergo a Site-Specific Visitor Orientation prior to going onto the project. All Visitors are required to sign in at the site office prior to entering the site at the start of each visit. Visitors that present valid Working at Heights, WHMIS and Worker Awareness are permitted to be on site without a Duncor approved representative. Visitors that are unable to produce valid proof of training must be on site with a Duncor approved representative at all times.

*\*\*Refer to Table 1 for required training.*

### TRAINING

All workers to the company and to Duncor sites will participate in an orientation.

### COMMUNICATION

This program will be communicated to all employees at the commencement of work.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## RECORDKEEPING

Acknowledgement forms signed by the worker and conductor of the orientation will be maintained on site.

All records and documents are required to be kept and maintained as per Duncor's Document & Record Control System as per Element 1.10 of this manual.

## DOCUMENTS REQUIRED

- Annual Orientation Booklet + Acknowledgement Form
- Corporate Orientation Slideshow
- Site-Specific Orientation Form for Workers / Visitors
- Duncor Training Matrix
- PSERP Acknowledgement Form
- New Worker Orientation

## EVALUATION

This procedure will be evaluated by management on an annual basis and changes will be implemented as required.

## APPLICABLE LEGISLATION

- Occupational Health and Safety Act R.S.O. 1990
- Ontario Regulations for Construction Projects, O. Reg. 213/91



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## 8.4 COMMUNICATION POLICY STATEMENT

Duncor considers the Environment and the Health and Safety of all to be the base upon which all operations are set. Duncor Senior Management recognizes that all workers have the right to a safe and healthy work environment and is committed to ensuring thorough communication of workplace hazards, risk and controls to prevent any and all undesirable events that may result in injury, illness and/or fatality.

Management believes in educating all workers on a consistent basis to ensure everyone's knowledge is continuously being enhanced as the information in health and safety and technology are improving. There are various ways in which Duncor communicates relevant information to all relevant workplace parties, whether written or verbal. It is Management's responsibility to ensure that workers are adequately trained in the work they are assigned to perform. This may be provided through review of safe work practices, safe job procedures. Workers are encouraged to provide input and feedback that may improve the methods in which relevant items are communicated.

Duncor also recognizes that all workers have the right to the accessibility of information. We are committed to ensuring that information is delivered in a manner that is understood by the receiver regardless of the worker's ability, language skills and literacy.

Workers are responsible for participating in sessions where important information is relayed. In the event where workers are absent during relevant training sessions, the absentee shall attend training or shall receive email communications of the relevant message being delivered. It is highly encouraged that all workers provide feedback and input where possible. Our HSMS is dependent on all workplace parties.

Management shall enforce progressive disciplinary measures with workers who do not participate or do not attend these mandatory communication meetings.

**Brian Duncan, Vice President**

January 23, 2026



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## 8.5 COMMUNICATION

### OVERVIEW

Duncor is committed to providing suitable and ample information, instruction, and training to all employees with consideration of ability, language skills and literacy to ensure the message conveyed is understood by the receiver, this may include translated text as necessary. Duncor ensures proper communication to all workers and relevant workplace parties via written and verbal communication.

### PURPOSE

The purpose of this program is to ensure that all relevant safety information is communicated to all employees throughout the organization. By communicating with our workers, Duncor opens dialogue for input from workers.

### SCOPE

This program applies to all Duncor workers and subcontractors on a construction project.

### ROLES & RESPONSIBILITIES

#### Employer / Senior Management

- Ensure health and safety meetings are held on an annual basis.
- Ensure relevant information regarding Duncor’s HSMS and its implementation to all employees.
- Provide an opportunity for workers to participate in health and safety related discussions.
- Ensure ongoing maintenance of the health and safety information board.
- Ensure information is translated to workers with language barriers and is verbalized for workers with literacy barriers.
- Ensure new/existing employees or employees with less experience receive appropriate training prior to starting tasks.

#### Health & Safety Coordinator

- Collect and review documentation related to health and safety meetings.
- Maintain health and safety meeting agendas, meeting minutes, Toolbox Talk discussions and attendance lists.
- Ensure ongoing maintenance of site and office health and safety information boards.
- Ensure internal and external health and safety communications are addressed in a timely manner.
- Communications received from the supervisor, foreman or Worker shall be addressed in a timely manner. Further communications to Senior Management may be necessary.
- Ensure new/existing employees or employees with less experience receive appropriate training prior to starting tasks.

#### Supervisors / Forepersons

- Conduct weekly Toolbox Talks.
- Ensure completion of Toolbox Talk related forms
- Ensure worker health and safety concerns are communicated to the Health & Safety Coordinator and/or Senior Management in a timely manner.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

Joint Health & Safety Committee

- Attend all monthly JHSC Meetings.
- Effectively communicate positive findings and opportunities for improvement.
- Act as a bridge between Management and Workers in situations where the Worker would like to remain anonymous when submitting a concern.

Workers

- Attend all weekly Toolbox Talks.
- Ensure a clear understanding of topics discussed and seek clarification when required.
- Know where additional information is found.
- Participate in continuous improvement by providing input to Management or to the JHSC Worker Representative.

Subcontractors / Service Providers

- Attend Health & Safety Management Meetings to ensure communication of relevant information that may affect the health and safety of the workplace.
- Hold own JHSC Meetings not participating in Duncor health and safety meetings for Management and Workers.

Visitors

- N/A

**PROCEDURE**

The following are a variety of methods that Duncor uses to communicate Health & Safety information:

<b>METHOD</b>	<b>FREQUENCY</b>	<b>PARTICIPANTS</b>
Health & Safety Information Boards	Ongoing	All Employees
Health & Safety Management Meetings	Monthly	Management
Toolbox Talks	Weekly	All Project Employees
JHSC	Quarterly	JHSC Committee
Safety Orientation Training	Prior to Start of Work	All Employees
Corporate Orientation Training	Annually	All Employees
Health & Safety Memos	Ongoing	All Employees
Internal/External Health & Safety Communications	Ongoing	All Employees
Senior Management Committee Meetings	Annually	Senior Management



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

**HEALTH & SAFETY INFORMATION BOARD**

Duncor H&S Information Boards are dedicated to the posting of health, safety and environmental materials and is mandatory to be installed at each project and office areas in a conspicuous location for ongoing review by all employees. The Health & Safety Coordinator, Project Manager and/or Site Supervisor is responsible for ensuring the following information is posted on each board, but is not limited to:

- Current Health & Safety Policy Statement
- Workplace inspection reports
- JHSC meeting minutes
- Current copy of the Occupation Health and Safety Act, Regulations and associated guidelines
- First Aid Regulations – O. Reg. 1101
- Regulatory agency inspections and orders
- Health & Safety training related information
- Health & Safety related memos
- Project Specific Emergency Safety Plan
- Project Specific Rules
- Emergency Response Plan and mock drill responses

**HEALTH & SAFETY MANAGEMENT MEETINGS**

Senior Management and / or Management members are responsible for ensuring Health & Safety Management Meetings are held on a monthly basis, at minimum. Concerns raised by Worker Health & Safety Representatives during these meeting are to be resolved in a timely manner and results are to be reported to the workforce. Management shall ensure all concerns are resolved within a 21-day period.

Management may take this opportunity to plan work to ensure all training requirements are met prior to the commencement of tasks. This particular Management Meeting may allow Management employees of Duncor and other trades to discuss how one trade’s work may affect the health and safety of the workplace. Corrective and preventative actions may be developed to eliminate any foreseen risks to the site’s health and safety.

Meeting Minutes will record the attendance, agendas, and the corrective actions to take place.

**TOOLBOX TALKS**

Toolbox Talks shall be conducted on a weekly basis by the Supervisor / Foreperson/competent person will cover a safety topic of relevance. During this training session, input from workers is highly encouraged.

A competent person, such as the Supervisor / Foreperson, is appointed to this task because they are familiar with the hazards associated with the work and is able to educate workers of appropriate control measures.

These Toolbox Talks will include: attendance, date, time, topics of discussion, review of previous inspections and any corrective actions and worker input / feedback.

**JHSC / HEALTH & SAFETY MEETINGS FOR MANAGEMENT AND WORKER REPRESENTATIVES**

Where applicable, on a monthly basis, Management holds a meeting to discuss any Health & Safety concerns.

In cases where Duncor does not exceed 20 or more workers, the Worker Health & Safety Representative, and worker participants and Management shall ensure Health & Safety Meetings are conducted.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

### SAFETY ORIENTATION TRAINING

This is a mandatory requirement prior to the start of work. The Site Supervisor or Health & Safety Coordinator is responsible for proving Site-Specific Orientations, which provide information to employees, Subcontractors, visitors, and any relevant workplace parties that will be present on a Duncor worksite.

In the case of the Annual Orientation, Duncor’s Health & Safety Coordinator or an outsourced qualified service provider will conduct the Annual Orientation.

Where a service provider is conducting the Orientation, Senior Management shall review and approve all content prior to ensure that all information communicated is aligned with Duncor’s HSMS and objectives.

### HEALTH & SAFETY MEMOS

Health & Safety related information to be delivered to all employees. Senior Management or the Health & Safety Coordinator will be responsible for relaying important information to employees by way of:

- Company-wide text message
- Company-wide e-mail
- Company-wide posting on the H&S Communication Board
- Toolbox Talk

### INTERNAL/EXTERNAL COMMUNICATIONS

Internal communications include information relevant to Duncor:

- Toolbox Talks
- Safety concerns
- Training
- Workplace Incidents

#### Internal Communication

- **Receiving:** All safety concerns and other communications shall be reported to his/her direct Supervisor / Foreperson/Manager.
- **Documenting:** The Supervisor will ensure details are documented. Further documentation, such as in JHSC meeting minutes, is required in the event further discussions take place.
- **Responding:** The Health & Safety Coordinator/Supervisor / Foreperson is responsible for communicating the results and implementation of corrective actions with all relevant workplace parties.

Internal communications shall flow as shown in the diagram below:





DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

External communications may include, but are not limited to:

- Ministry of Labour inspections and orders;
- Ministry of Environment inspections and orders;
- Equipment recalls or changes to equipment specifications;

External Communication

- **Receiving:** All communications mentioned above shall be delivered to the Health & Safety Coordinator/Supervisor / Foreperson. Upon receipt, the recipient shall communicate details with all relevant workplace parties.
- **Documenting:** Communications received from a regulatory agency shall be submit records be filed as per Duncor Documentation System. A copy of records shall be kept on site and maintained on the Health & Safety Information Board to ensure it is readily available.
- **Responding:** The Health & Safety Coordinator/Supervisor / Foreperson is responsible for communicating the results and implementation of corrective actions with all relevant workplace parties.

**SENIOR MANAGEMENT COMMITTEE MEETINGS**

Annual Health & Safety meetings held by members of the Senior Management Committee to review the HSMS, the implementation of the HSMS, identified trends, objectives and worker input. Outcomes of this annual review are required to be communicated to all Duncor employees through the Annual Orientation Training. Employees will be given the opportunity to provide feedback / input to the HSMS.

*Refer to Element 14 of this manual for the procedure.*

**TRAINING**

At the time of Orientation, all workplace parties will be informed of where Health & Safety related information can be identified and to whom they may raise Health & Safety concerns.

**RECORDKEEPING**

Duncor Health & Safety Coordinator shall ensure maintenance of H&S documentation (e.g., meeting attendance forms, agendas, meeting minutes and Toolbox Talks). Duncor Supervisors / Forepersons are required to post any relevant information on the Health & Safety Information Board and are required submit meeting documentation to the Health & Safety Coordinator.

All records and documents are required to be kept and maintained as per Duncor’s Document & Record Control System as per Element 1.10 of this manual.

**DOCUMENTATION REQUIRED**

- Health & Safety Meeting Minutes
- Annual Senior Management Health & Safety Meeting Minutes

**EVALUATION**

This procedure will be evaluated by management on an annual basis and changes will be implemented as required.

**APPLICABLE LEGISLATION**

- Occupational Health and Safety Act R.S.O. 1990
- Ontario Regulations for Construction Projects, O. Reg. 213/91



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 8.6 TOOLBOX TALKS

### OVERVIEW

Toolbox Talks are intended to convey information about the workplace regarding potential or existing hazards. Toolbox Talks ensure that workers are aware of safe work practices and hazard controls related to their specific scope of work.

### PURPOSE

The purpose of this program is to ensure that all relevant safety information regarding workers' activities will be discussed.

### SCOPE

This program applies to all Duncor workers and subcontractors on a construction project.

### ROLES & RESPONSIBILITIES

#### Employer / Senior Management / Management

- Ensure Toolbox Talks are occurring on a regular basis.

#### Supervisors / Forepersons

- Conduct Toolbox Talks on a weekly basis.
- Ensure topics are relevant to the workers' scope of work.
- Ensure all workers participate in Toolbox Talks.
- Ensure all Toolbox Talks discussion topics are documented and attendance is recorded.
- Ensure all subcontractors are conducting Toolbox Talks on a weekly basis.
- Ensure all subcontractors submit a copy of their Toolbox Talk and attendance on a weekly basis.
- Include discussion topics from the monthly H&S Meetings.

#### Workers

- Attend all Toolbox Talks.
- Ensure an understanding of all topics covered and seek clarification where required.

#### Subcontractors / Service Providers

- Subcontractors are required to complete weekly Toolbox Talks with their crews.
- The Subcontractor Supervisor shall ensure weekly submissions of their Toolbox Talks to a Duncor Supervisor / Foreperson.
- Toolbox Talks form shall include attendance, date, time and agenda.

#### Visitors

- N/A

### PROCEDURE

Supervisors / Forepersons will be required to hold regular Toolbox Talks a minimum of once a week or as often as the constructor or JHSC requires. Toolbox Talks should take between 10-15 minutes.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

Toolbox Talks may include (but are not limited to) the following topics:

- WHMIS
- Fall Arrest
- Hot Work
- Personal Protective Equipment
- Fire Extinguisher Training
- Ladder Safety
- Lifting Devices, etc.
- Pertinent information drawn from Monthly H&S Meetings shall be included as necessary.

## **TRAINING**

Toolbox Talks will be conducted by a competent person (e.g., supervisor or foreman).

## **RECORDKEEPING & COMMUNICATION**

A record of all Toolbox Talks and workers in attendance will be maintained by Duncor management. Contractors, subcontractors and independent operators are to maintain a record of their Toolbox Talks and workers in attendance and submit to Duncor site office on a weekly basis. Duncor management will maintain record of all contractor, subcontractor and independent operator Toolbox Talks in the site office.

All records and documents are required to be kept and maintained as per Duncor's Document & Record Control System as per Element 1.10 of this manual.

## **DOCUMENTS REQUIRED**

- Toolbox Talk Form

## **EVALUATION**

This procedure will be evaluated by management on an annual basis and changes will be implemented as required.

## **APPLICABLE LEGISLATION**

- Occupational Health and Safety Act R.S.O. 1990
- Ontario Regulations for Construction Projects, O. Reg. 213/91



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## ELEMENT 9: WORKPLACE INSPECTIONS

REVISION LOG				
YEAR.REV #	REVISED BY	DATE REVISED	APPROVED BY	DESCRIPTION OF CHANGES
2021.1	J. LASTNAME	MM.DD.YYYY	MR. PRESIDENT	<ul style="list-style-type: none"> <li>• X</li> <li>• Y</li> <li>• Z</li> </ul>
2022.1	KELCIE STEVENSON	01.2022	BRIAN DUNCAN	<ul style="list-style-type: none"> <li>• HSMS2022.1 SUPERSEDED BY HSMS2023.1</li> </ul>
2023.1	KELCIE STEVENSON	01.25.2023	BRIAN DUNCAN	Included: <ul style="list-style-type: none"> <li>• Roles and Responsibilities for all relevant workplace parties</li> <li>• Workplace Inspections Policy Statement</li> <li>• Inspection schedule</li> <li>• Emergency equipment requirements</li> </ul> Withdrew: <ul style="list-style-type: none"> <li>• HSMS2022.1 procedure</li> </ul>
2024.1	KELCIE STEVENSON	01.24.2024	BRIAN DUNCAN	Modified: <ul style="list-style-type: none"> <li>• Communication procedure</li> </ul> Withdrew: <ul style="list-style-type: none"> <li>• HSMS 2023.1 procedure</li> </ul>
2025.1	KELCIE STEVENSON	01.22.2025	BRIAN DUNCAN	Included: <ul style="list-style-type: none"> <li>• Worker participation</li> </ul> Modified: <ul style="list-style-type: none"> <li>• Communication requirements</li> </ul> Withdrew: <ul style="list-style-type: none"> <li>• HSMS 2024.1 procedure</li> </ul>
2026.1	KELCIE STEVENSON	01.21.2026	BRIAN DUNCAN	Modified: <ul style="list-style-type: none"> <li>• Documents Required</li> </ul> Withdrew: <ul style="list-style-type: none"> <li>• HSMS 2025.1 procedure</li> </ul>



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## 9.1 WORKPLACE INSPECTIONS POLICY STATEMENT

Duncor Senior Management recognizes that all workers have the right to work in a healthy and safe environment and as such we are committed to the implementation and on-going improvement of our H&S policies and procedures to be reflected in our HSMS. As part of this, management believes that workplace inspections play a proactive and crucial role in ensuring that all person(s) are working in an environment that is as healthy and safe as possible. Management demonstrates their commitment by ensuring that all Duncor owned / controlled workplaces are thoroughly inspected by the assigned personnel at specified periods.

Outlined in the Workplace Inspections Program are:

- Key roles in this process
- Key responsibilities for each role
- Required training
- Inspection frequencies
- Forms to be used

Senior Management is committed to ensuring that all employees who are required to complete documented inspections are adequately trained in identifying hazards and the application and implementation of corrective actions.

All relevant workplace parties are responsible for ensuring compliance with the policies and procedures within our HSMS, as well as with legislative and other requirements. Failure to comply will result in progressive disciplinary action.

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**Brian Duncan, Vice President**  
January 23, 2026



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 9.2 WORKPLACE INSPECTIONS

### PURPOSE

Safety audits and inspections will help determine the degree of compliance with the Occupational Health and Safety Act and Regulations Duncor Safety Policy/ Program and associated Safe Job Procedures.

### PROGRAM GOALS

Properly completed inspections by trained personnel are one of the best tools available to find problems and assess their risk before incidents and other losses occur. A well-managed inspection program can accomplish the following:

- Identify potential problems
- Identify equipment deficiencies
- Identify improper employee actions
- Prevention of non-conformities
- Application of correction actions to non-conformities
- Identify the effects of changes
- Demonstrate management commitment

### SCOPE

This program applies to all Duncor work locations.

### ROLES & RESPONSIBILITIES

#### Management/Employer/Constructor

- Ensure applicable parties are completing workplace inspections according to the Occupational Health and Safety Act and all applicable regulations, standards and codes.
- Ensure workers that are required to perform inspections are competent to do so through formal training or other instruction.
- Provide assistance and information to Joint Health and Safety Committee members with respect to any hazards or failures to comply with company policies and procedures or the OHS Act and Regulations.
- Respond to any recommendations to management in a timely manner and verify that corrective actions have been taken.
- Conduct periodic reviews of completed inspections during the monthly management meetings, respond to any deficiencies and ensure they have been addressed.

#### Health & Safety Coordinator

- Ensure applicable parties are completing workplace inspections according to the Occupational Health and Safety Act and all applicable regulations, standards and codes.
- Ensure workers that are required to perform inspections are competent to do so through formal training or other instruction.
- Provide assistance and information to Joint Health and Safety Committee members / representatives with respect to any hazards or failures to comply with company policies and procedures or the OHS Act and Regulations.
- Respond to any recommendations to management in a timely manner and verify that corrective actions have been taken.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

- Inspection results will be discussed in detail at the monthly Health & Safety meeting. The Health & Safety Coordinator shall ensure that all inspection results are communicated to Senior Management.
- Conduct periodic reviews of completed inspections during the monthly management meetings, respond to any deficiencies and ensure they have been addressed.
- Ensure all records pertaining to pre-use inspections of vehicles machines, tools and equipment including corrective actions are collected from the Supervisor / Foreperson.
- Ensure that vehicles, machines, tools and equipment records are kept and maintained as outlined in Element 7.2, Vehicles, machinery / equipment and tools service and maintenance records, operator's manual and service schedules shall be maintained.
- Formally inspect the workplace as per the Inspection Schedule, ensuring legislated inspections meet legislative and manufacturer requirements (e.g., first aid kits, fire extinguishers, equipment, workplace, etc.).
- Respond to notifications from the Duncor Electronic Record System and create a corrective action plan for deficiencies that require services from a qualified service provider.
- Ensure legislated and/or administrative documents are readily available on site. These items will be found in the inspection form to ensure regular auditing.

Supervisors / Forepersons

- Formally inspect the workplace as per the Inspection Schedule, ensuring legislated inspections meet legislative and manufacturer requirements (e.g., first aid kits, fire extinguishers, equipment, workplace, etc.).
- Attend Basics of Supervisor Training or other equivalent training to ensure competence.
- Attend Supervisor Orientation to ensure additional training is received, such as; Hazard Identification & Risk Assessment training, investigation & reporting procedures, etc.
- Ensure that all equipment, vehicles, materials and protection devices are maintained in good working conditions.
- Inform workers of all hazards at the worksite.
- Investigate dangerous conditions and work refusals.
- Ensure that all workers comply with the Occupational Health and Safety Act and all applicable regulations, standards and codes.
- Ensure all nonconformities or deficiencies identified are documented on the inspection form.
- Ensure that corrective actions are rectified in a timely manner, and the individual responsible for corrective action verifies it was completed.
- Ensure corrective action items are recorded on the inspection form with what was done to remedy the issues, who completed it, and when.
- Ensure all records pertaining to pre-use inspections of vehicles machines, tools and equipment > 10hp including corrective actions are completed by assigned personnel and collected, at minimum, weekly, from all relevant workplace parties. This includes, but is not limited to, Duncor employees, Subcontractors, and service providers.
- Ensure equipment / tool / vehicle inspections are completed and collected.
- Create a notification for the Health & Safety Coordinator in the Duncor Electronic Record System for identified deficiencies.

Certified Member/Worker Representative

- Formally inspect the workplace on a monthly basis, at a minimum.
- Ensure that all equipment, materials and protection devices are maintained in good working conditions.
- Inform workers of all hazards at the worksite.
- Investigate dangerous conditions and work refusals.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

- Ensure that all workers comply with the Occupational Health and Safety Act and all applicable regulations, standards and codes.
- Ensure that corrective action is taken in a timely manner, and the individual responsible for corrective action verifies it was completed.
- Ensure corrective action items are recorded on the inspection form with what was done to remedy the issues, who completed it, and when.

Workers / Subcontractors / Service Providers

- Participate in the daily workplace inspections prior to the start of work (JHA).
- Conduct pre-use inspections of equipment and tools. The end user of any equipment or tools over 10 hp shall be documented on the appropriate forms.
- Report actual and/or potential hazards to the Supervisor / Foreperson.
- Participate in the inspection process, such as conducting inspections with the Supervisor / Foreperson, by providing input for corrective actions, and cooperate with implementation of corrective actions.
- Complete forms as required and ensure they are submitted to Duncor Supervisors weekly.

Visitors

- N/A

**PROCEDURE**

Workplace inspections are to be completed as required by the Occupational Health and Safety Act and all applicable regulations, codes and standards. The following is a list of the trained individuals that are competent in completing Duncor Safety Inspections:

Inspection	Competent Person	Frequency
Workplace Inspection – Site	Supervisor	Weekly
Workplace Inspection – Quarry/ Plant/Office, Shop & Yard	Health & Safety Coordinator	Annually
Workplace Inspection – Shop & Yard	Shop Supervisor	Monthly
Workplace Inspections	Certified Member/Worker Representative	Monthly
First Aid Equipment	Qualified First Aider/ERT Member	Quarterly
Fire Extinguishers	Supervisor/ERT Member	Monthly

Each workplace inspection is documented and is then discussed at the monthly health and safety meetings so that management is aware of any non-conformities that have led to incidents or could lead to incidents, and corrective actions that have or need to be taken.

**Worker participation**

In addition to JHA’s and pre-use inspections workers are to be involved in the general workplace inspection through completing monthly workplace inspections by Worker JHSC/ H&S representatives. Records of these will be maintained on Safetyloop and regularly monitored and reviewed by the Health and Safety Coordinator and/or Management.

**Elements for Safety Inspections and Reviews**

- Physical premises (office/building) conditions,
- Construction Projects (as required),
- Equipment condition and maintenance records (fire extinguishers),
- First Aid Kits,



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

- Operator and manufacturer’s instruction manuals availability,
- PPE availability,
- Administrative postings (WHMIS, Form 82, OHS Act),
- Compliance with policy, SWPs, and legal requirements,
- Physical condition of work areas
- Access and egress routes to and from work areas,
- Housekeeping and hygiene conditions
- Worker training records, notice boards, JHSC meeting minutes,
- Emergency Response Plans

It is critical that the root causes for all non-compliance issues are investigated. All high risk hazards (see Hazard Rating System) found will be thoroughly investigated. Permanent remedial actions are required to maintain Loss Control. In many cases remedial actions may not be able to eliminate the non-compliance issue but may need to reduce its outcome severity and frequency. Some risks remain unless the activity is stopped and removed – fully. **Only the site superintendent or the Health & Safety Coordinator will complete Hazard Rating System analyses and make all decisions regarding any, and all Critical Actions.** These decisions will be based on the following factors:

1. Legal requirements
2. The potential severity of loss
3. The probability of an occurrence
4. The cost of control
5. The likely degree of control
6. Control alternatives
7. Justification for the control measure

**NOTE:** ANY, AND ALL ACTIONS TAKEN WILL MEET THE REQUIREMENTS OF THE OCCUPATIONAL HEALTH & SAFETY ACT AND REGULATIONS.

**Follow-up Process**

The individual that completes the inspection is responsible to ensure results of the inspection are communicated to Senior Management and the Health & Safety Coordinator, and that a follow-up has been completed. The follow-up will include performing the following:

1. Writing the work order giving direction on the action to be taken.
2. If a SWP is required, ensuring it is written and implemented.
3. Ensuring that all workers involved in a Critical Action SWP are trained on the SWP and all the associated requirements.
4. Verifying that the action has started.
5. Monitoring the work to ensure actions/controls are taken, and any new SWP’s are implemented and working.
6. If required, reworking the SWP’s, or controls.

**Common Hazards**

Some common hazards typically found at a worksite include, but are not limited to:



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

- Falls from heights
- Improper use of fall protection equipment
- Improper use of ladders
- Poor housekeeping or use of ladders
- Overhead power lines
- Unsecured trenches
- Reversing vehicles and equipment
- Extension cord and tools in poor condition
- Poorly assembled scaffolds and guardrails
- Hazardous materials that could be toxic, dangerously reactive, flammable, or explosive
- Poor materials handling
- Improper placement and assembly of guardrail systems

**Documentation Audits**

Audits are conducted in addition to site level inspection to ensure that all documentation is available and up to date. The Health & Safety Coordinator will perform an Audit which will assess the following, but not limited to, items: safety board, JHSC minutes, equipment inspections, training documentation, orientations, etc.

**Equipment Inspection**

All equipment, tools, machinery, vehicles over 10hp will be inspected as per legislation and manufacturer’s instructions, prior to each use. O. Reg. 213/91 s.93/94

Identified deficiencies and corrective actions must be documented. Records of inspections, deficiencies and corrective actions will be filed as per Duncor Documentation System.

Inspection Type	Inspector	Frequency	Required Form
Fall Protection PPE and Equipment	End User	Daily / Before Each Use	Fall Protection Equipment Pre-Use Inspection Elevated Work Platform Pre-Use Inspection
	Competent Inspector	Annual	
Vehicle Inspection	End User	Daily / Before Each Use	Light-Duty (Non-Commercial) Vehicle Inspection
Machine, Equipment and Tools	End User	Daily / Before Each Use	Specific to machine, equipment, tool
	Authorized Inspector	Annual (if applicable)	(Specific to machine, equipment, tool)
CVOR Vehicle	End User	Daily / Before Each Use	FC Inspect Report
	MTO	Annual	
PPE Inspection (Hard Hat, Safety Glasses, Hi-Vis Vest)	End User	Daily / Before Each Use	Job Hazard Analysis
Respirator Inspection	End User	Daily / Before Each Use	Respirator Pre-Use Inspection

**Legislated Inspections**

All of the above-mentioned inspections shall be completed as legislated and shall meet manufacturer requirements.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, VICE PRESIDENT
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

The following inspections shall also be completed:

- All First Aid equipment will be inspected on a monthly basis, and no less than on a quarterly basis by a Qualified First Aider. This will be documented in the First Aid Kit Inspection Form.
- The date of inspection shall be recorded on the inspection card, located inside the First Aid Kit, O. Reg.1101 s.6. All equipment inspected shall be in good working condition and must meet manufacturer requirements.
- All fire extinguishers must be visually inspected at least once a month by a competent worker.
- The date of inspection must be recorded on the tag attached and signed. The inspector shall ensure that all fire extinguishers are free of damage and meet manufacturer requirements. O. Reg. 213/91 s.55
- Components to be inspected are found in the inspection form for what is being inspected. *Refer to Inspection Forms.*

**Head Office**

The certified member at the Duncor head office is responsible for completing a monthly inspection of the entire office conditions on a monthly basis. All inspection forms are to be maintained on file at head office.

**TRAINING**

All project Supervisors / Forepersons will receive training in Basics of Supervising or other equivalent course. In Ontario; on projects with over 50 persons on site or in the office with over 20 persons present, one worker and one Manager will receive training to be the Certified Member.

**COMMUNICATION**

Following completion of the inspection, results should be communicated by the individual responsible for completing the inspection to the Supervisor responsible for that work location. Completed JHAs are reviewed and signed by all workers onsite and periodically by the Health and Safety Coordinator and appropriate Management. JHSC Monthly Workplace Inspections are reviewed and signed by Senior Management and posted on Health and Safety Boards.

Toolbox talks are a means of communicating relevant findings of workplace inspections to applicable workers. Records of toolbox talks are maintained on Safetyloop.

All completed inspections will be available for worker review on SafetyLoop and/or posted in the workplace.

**RECORDKEEPING**

Records of required workplace inspections including identification and prevention of potential non-conformities and corrective actions are required to be filed and stored as per Duncor’s Document & Record Control System as per Element 1.10 of this manual.

All non-conformities identified and corrective actions required must be documented on the inspection form(s). The individual responsible for completing the action will sign off and date once the corrective actions have been taken, and the hazard identified is removed or reduced. The records of inspection will then be reviewed during the site-specific monthly health and safety meeting where the discussion of non-conformities and corrective actions with management will be documented.

**DOCUMENTATION REQUIRED**

- JHA
- Equipment Inspection Forms
- First Aid Kit Inspection Form
- Workplace Inspection Forms – Site, Shop/Office, Quarry, Plant



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## EVALUATION

This procedure will be evaluated by management on an annual basis and changes will be implemented as required.

## APPLICABLE LEGISLATION

- Occupational Health and Safety Act R.S.O. 1990
- Ontario Regulations for Construction Projects, O. Reg. 213/91
- Workplace Safety and Insurance Act



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, VICE PRESIDENT
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## ELEMENT 10: INVESTIGATIONS & REPORTING

REVISION LOG				
YEAR.REV #	REVISED BY	DATE REVISED	APPROVED BY	DESCRIPTION OF CHANGES
2021.1	J. LASTNAME	MM.DD.YYYY	MR. PRESIDENT	<ul style="list-style-type: none"> <li>X</li> <li>Y</li> <li>Z</li> </ul>
2022.1	KELCIE STEVENSON	01.2022	BRIAN DUNCAN	<ul style="list-style-type: none"> <li>HSMS2022.1 SUPERSEDED BY HSMS2023.1</li> </ul>
2023.1	KELCIE STEVENSON	01.25.2023	BRIAN DUNCAN	Included: <ul style="list-style-type: none"> <li>Roles and Responsibilities for all relevant workplace parties</li> <li>Investigations &amp; Reporting Policy Statement</li> </ul> Withdrew: <ul style="list-style-type: none"> <li>HSMS2022.1 procedure</li> </ul>
2024.1	KELCIE STEVENSON	01.24.2024	BRIAN DUNCAN	Modified: <ul style="list-style-type: none"> <li>Corrective and Preventative Actions (CAPAS)</li> </ul> Withdrew: <ul style="list-style-type: none"> <li>HSMS2023.1 procedure</li> </ul>
2025.1	KELCIE STEVENSON	01.22.2025	BRIAN DUNCAN	Modified: <ul style="list-style-type: none"> <li>Corrective and Preventative Actions (CAPAS)</li> <li>Documents required</li> </ul> Withdrew: <ul style="list-style-type: none"> <li>HSMS 2024.1 procedure</li> </ul>
2026.1	KELCIE STEVENSON	01.21.2026	BRIAN DUNCAN	Modified: <ul style="list-style-type: none"> <li>10.2 Definitions</li> <li>10.2 Procedure</li> <li>10.2 Procedure, Corrective and Preventative Actions (CAPAs)</li> </ul> Withdrew: <ul style="list-style-type: none"> <li>HSMS 2025.1 procedure</li> </ul>



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 10.1 INVESTIGATIONS AND REPORTING POLICY STATEMENT

Duncor Senior Management considers the Environment and the Health and Safety of all to be the base upon which all operations are set. Duncor Senior Management is committed to implementing, promoting, and maintaining a strong and effective incident/accident reporting and investigation program, should one occur. Duncor Senior Management is committed to performing periodic reviews of the incident/accident reporting and investigation program annually to ensure continual improvement by evaluating the suitability, adequacy, and effectiveness of the management program. Events triggering Management to complete incident reports and investigations will be reviewed as needed.

Duncor requires that all employees, Subcontractors and its employees, and visitors report all incidents including all first aid and medical aid injuries, non-occupational injuries/illnesses, near misses, property damage, environmental damage and hazardous conditions immediately after the occurrence. Reporting of incidents provides Duncor the opportunity to improve our HSMS, workplace conditions and environment, and safety performance.

The procedures outlined in this section of the Health & Safety program will serve as a source of information for persons required to perform the tasks of investigation and reporting incidents, and will include the following information:

- Classifications of incident/injury types and severity.
- Procedures for conducting proper incident/injury investigations.
- Procedures for proper reporting incidents/injuries.
- Forms to be used in completing the investigations.

### PROGRAM GOALS

1. Ensure that concise detailed investigations are performed and documented.
2. Ensure that proper internal and external reporting procedures are completed.
3. Implement preventative actions to prevent recurrence.

To achieve the above-mentioned goals, the following group of persons will be involved in all injury/incident investigations:

- Employer/Site Supervisor / Foreperson
- Site Safety Professional
- Certified Member and/or Worker Representatives
- An Owner representative (if required)
- Involved personnel may include service providers, subcontractors, or visitors

### Definitions:

#### Critical Injury

“critically injured” means an injury of a serious nature that,

- (a) places life in jeopardy,
- (b) produces unconsciousness,
- (c) results in substantial loss of blood,
- (d) involves the fracture of a leg or arm but not a finger or toe,
- (e) involves the amputation of a leg, arm, hand or foot but not a finger or toe,



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<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

(f) consists of burns to a major portion of the body, or

(g) causes the loss of sight in an eye. R.R.O. 1990, O. Reg. 420/21.

Incidents can be defined as an occurrence, condition, or situation arising in the course of work that resulted in or could have resulted in injuries, illnesses, damage to health, or fatalities.

Accident is an unplanned event that interrupts the completion of an activity, and that may (or may not) include injury or property damage. Some make a distinction between accident and incident. They use the term incident to refer to an unexpected event that did not cause injury or damage that time but had the potential.

Near Miss or "dangerous occurrence" - are terms for an event that could have caused harm but did not.

All workplace parties are required to participate and comply with this policy and procedure. Duncor shall ensure that requirements set by the Occupational Health and Safety Act and Workplace Safety and Insurance Board are met. Failure to meet the requirements set in Duncor policies and procedures, legislative and other legal requirements may result in disciplinary action.

**Brian Duncan, Vice President**

January 23, 2026



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 10.2 INCIDENT MANAGEMENT

### OVERVIEW

The procedures outlined in this section of the H&S program will serve as a source of information for persons required to perform the tasks of investigation and reporting incidents, and will include the following information:

- Classifications of incident/injury types and severity.
- Procedures for conducting proper incident/injury investigations.
- Procedures for proper reporting incidents/injuries.
- Forms to be used in completing the investigations.

Prompt and effective Emergency Response will help ensure that injuries sustained by workers involved in the workplace receive immediate and appropriate medical treatment. Prompt and effective Incident Investigations will ensure that similar types of incidents are prevented.

### PURPOSE

The purpose of this procedure is to outline the steps to take in the event of an injury or incident in the workplace.

### PROGRAM GOALS

1. Ensure that concise detailed investigations are performed.
2. Ensure that proper internal and external reporting procedures are completed.
3. Implement preventative actions to prevent recurrence.

To achieve the above-mentioned goals, the following group of persons will be involved in all injury/incident investigations:

- Employer Supervisor / Foreperson
- Employer Health & Safety Coordinator
- Site Safety Professional
- Certified Member and/or Worker Representatives
- An Owner representative

### SCOPE

This procedure applies to all Duncor work locations.

### DEFINITIONS

Incident: An incident is an undesired event that downgrades the efficiency of the business operation and results in physical harm to a person, damage to property or loss to a process. It is caused by contact with a substance or source of energy above the threshold limit of the body or structure.

Near Miss: Any undesired, unplanned event that could, under slightly different circumstances, result in an incident.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

Witness: Anyone who saw, heard, or otherwise has knowledge of the incident/injury/potential serious occurrence or circumstances leading up to it, and/or results of it.

Unsafe Act/Practices: Violation of an accepted safe procedure that could permit the occurrence of an incident.

Unsafe Conditions: The hazardous physical condition or circumstance that could directly permit the occurrence of an incident.

Investigator: Is the competent individual responsible to conduct the investigation and champion the Investigation Team as required (e.g., Health & Safety Coordinator, Supervisor, person in charge, Scene Coordinator)

Corrective Action: An action taken to eliminate the root cause of a detected incident or nonconformity, the goal is to prevent recurrence of the same issue.

Preventative Action: An action taken to eliminate the cause of a potential incident or nonconformity before it occurs, the goal is to prevent initial occurrence.

Root Cause: The underlying factor(s) that led to the incident or near miss, which, would prevent recurrence if removed. This goes beyond immediate or surface-level issues.

Critical Injury:

- “critically injured” means an injury of a serious nature that,
- (a) places life in jeopardy,
- (b) produces unconsciousness,
- (c) results in substantial loss of blood,
- (d) involves the fracture of a leg or arm but not a finger or toe,
- (e) involves the amputation of a leg, arm, hand or foot but not a finger or toe,
- (f) consists of burns to a major portion of the body, or
- (g) causes the loss of sight in an eye. R.R.O. 1990, Reg. 834, s. 1.

**ROLES & RESPONSIBILITIES**

Senior Management / Health & Safety Coordinator

- Senior Management shall ensure the Duncor Managers and Supervisors / Forepersons are adequately trained in performing incident investigations during the annual Corporate Orientation session / new employee onboarding process.
- Senior Management shall ensure all workers are familiar with the roles and responsibilities associated with the incident investigation procedure. Workers will then be assigned to a role, as applicable, when on site.
- Notify the appropriate external emergency response agencies.
- Notify internal emergency response personnel and Duncor contacts.
- Lead the incident investigation process and ensure they are conducted in a timely manner.
- Identify root cause to determine appropriate corrective and preventative actions to be implemented.
- Ensure corrective and preventative actions are implemented after the incident investigation has been completed.
- Evaluate effectiveness of corrective measure implemented.
- Communicate investigation results and corrective / preventative actions to all relevant parties in a timely manner via Toolbox Talks, memos, other meetings.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

- Records and documents of incident investigations shall adhere to Duncor’s Document and Record Control System.

Supervisors / Forepersons

- Ensure the incident scene has been properly secured to mitigate any additional injury or consequences of the incident.
- Notify Senior Management and Health & Safety Coordinator immediately of the incident to initiate the Incident Investigation Procedure.
- Assist the Health & Safety Coordinator with incident investigations.
- Activate the Emergency Response Plan, where required.
- Assist with/lead the incident investigation process and ensure they are conducted in a timely manner.
- Ensure corrective and preventative actions are implemented and are effective, document on inspection forms as required.
- Communicate investigation results and corrective / preventative actions to all relevant parties in a timely manner via Toolbox Talks, memos, other meetings.

Employees

- Report all incidents, injuries, serious occurrences, or potential serious occurrences to Manager/Supervisor / Foreperson.
- Provide support during an investigation procedure for proper response and follow-up.
- Become familiar with your roles and responsibilities in the incident investigation process.
- Provide witness statements, where applicable.

Subcontractors / Service Providers

- Ensure the incident scene has been properly secured.
- Notify the Health & Safety Coordinator and/or Site Supervisor / Foreperson immediately of the incident to initiate the Incident Investigation Procedure.
- Lead the incident investigation and assist Duncor Management with their incident investigation where appropriate.
- Provide witness statements, where applicable.
- Activate the Emergency Response Plan, where required.
- Ensure corrective and preventative actions are implemented.

Visitors

- Provide witness statements, where applicable.

**PROCEDURE**

- Any incident that results in, or, has the potential to cause serious injury or property damage, must be suitably investigated by the Supervisor / Foreperson and reported to Duncor representative using Duncor Incident Report Form, with a copy kept on site by both the Supervisor / Foreperson and the subcontractor involved. Subcontractors are required to investigate and report any incident to the appropriate occupational health and safety authority and/or Workplace Safety and Insurance Board in accordance with provincial regulations.
- All incident investigation and reporting forms must include a clearly defined section for **Root Cause Assessment**, where investigators must explain why the incident occurred.
- The Supervisor/Foreman must report the incident by completing the appropriate form.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

- The Health & Safety Coordinator will be involved in the investigation of all recordable injuries (first aids, medical aids, lost times, potential serious occurrence or serious property damage).
- The Health & Safety Coordinator shall review the incident report submitted by the Supervisor/Foreman.
- Prior to contacting any external regulatory agencies, a Duncor representative must be notified, and an internal investigation will commence.
- For serious injuries such as lost time injuries, critical injuries, potential serious occurrences or serious property damage, the scene **must not be disturbed** and must be secured until the investigation is complete.

**NOTE: Once the emergency response plan has been activated, critical injuries must be reported to the Supervisor / Foreperson and Health & Safety Coordinator immediately.**

- All employees must be competent and be familiar with the Occupational Health and Safety Act as it relates to incidents, investigations and reporting procedures.
- The definition of competent person will apply to all management, Supervisors / Forepersons, workers, owners, contractors, subcontractor, consultants and all others involved with the project.
- If required, subcontractors will ensure a competent Health and Safety representative is on site and is capable of liaising with Duncor representative.

**The incident management program ensures that all work-related injuries, property losses, equipment damages, potential serious occurrences, environmental upsets, and other losses are reported and documented.**

### Initial Response

#### **(Refer to Emergency Response Planning)**

- Ensure that any injured personnel are properly cared for by qualified first aid personnel only (e.g., provide CPR as necessary).
- Notify appropriate emergency agencies, when necessary.
- Mitigate secondary incident or any additional consequences by shutting down any equipment that could cause further injury or damage.
- Protect and secure incident site by restricting access (e.g., with ropes, caution tape etc.).
- Preserve the scene exactly as it was at the time of the incident (Note: This is a critical step and is very important to investigators).

### Recording at the Scene

#### **(Refer to Incident Investigations program)**

#### **Investigators:**

- Identify and locate all witnesses and injured personnel to interview.
- Document an accurate record of the incident scene.
- Take detailed photographs, if possible, of the preserved scene.
- Show position and condition of all critical elements involved.
- Draw a detailed picture of the scene



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

- Initiate and provide guidance throughout the investigation.
- Use the above mentioned "pictures" to evaluate elements that may not have been considered critical during initial investigation but are being considered now to answer any questions arising during the investigation.

### Interviewing Witnesses

#### Investigators:

- Ensure that the interview is performed in a non-threatening manner.
- Fill out Witness Statement.
- Record the witness statement exactly (e.g., word for word), and do not use your own words.
- Ask the injured personnel and/ or witnesses these five (5) key questions:
  1. **Who** - had the incident? Name, age, occupation, work experience, training, the extent of any injuries or loss?
  2. **What** - tools, protective equipment, machines, etc. were involved? Actions were involved (e.g., what work was being performed at the time); and precipitated the incident (slipping, falling, etc.)?
  3. **Where** - did the incident happen (be specific)?
  4. **When** - did it happen (time of day, night or shift)?
  5. **Why** - did it happen, were there direct or indirect causes, (an unsafe condition or unsafe action, or perhaps a poorly designed system)?

**Note: Ensure not to attach the word "BLAME", to anyone when interviewing and determining the facts. Create a calm atmosphere when conducting all investigations.**

### Finding All Causes

#### Investigators Must:

- Determine underlying, direct/indirect, basic and root causes and deficiencies that allowed the unsafe act and unsafe condition to occur.
- Review the hazard assessment completed prior to the work and what controls were considered and how they were implemented.
- Review the SWP/SJP for the work and whether controls were properly implemented.
- Use Common Causes of Incidents/Incidents, to aid in finding all causes.
- Create a process for corrective action, to eliminate the possibility of a similar incident from reoccurring.

### The Report

#### Investigators Should:

Use the Incident Investigation Report Form.

#### Ensure the report includes the following:

- Completed descriptions of all the facts concerning the incident.
- Clear and precise descriptions of what individuals were doing at the time of the incident.
- A description of events leading up to the time the incident occurred.
- All the signatures of the people involved and any witnesses.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

- All the names of the members in the Investigation Committee.
- All the names of the members in any follow-up committees.
- All causes relating to the incident.
- Identification of each direct and associated cause.
- The corrective action taken (which must be reviewed and approved by all involved, including management, in the investigation).
- Ensure all associated documents are attached.
- Review all recommendations (prior to implementation) with all persons involved to ensure it does not lead to a dangerous situation.
- Implement the approved corrective actions to prevent repetition of the incident.

**Note: See Section 10.3 Legislation for MOL reporting requirements.**

**Corrective and Preventative Actions (CAPAs)**

A review of the investigation of the incident will take place and be documented to identify root causes, corrective and preventative actions and shall be discussed.

When identifying and documenting preventive actions, investigators must explain the reasoning behind each action selected. This includes how the action addresses the root causes, how it will reduce risk, and why it is the most appropriate control. Investigators should reference supporting evidence from the investigation such as hazard assessments, witness input, past incidents, or gaps in training or procedures.

Once root causes are identified and/or deficiency within the HSMS are identified. CAPA's are generated to ensure identification of deficiencies, actions required, target dates, and responsibilities are documented. The Senior Management team and Health and Safety Coordinator to ensure corrective and preventative actions are implemented following the CAPA.

The Senior Management team, including the Health & Safety Coordinator, is responsible for measuring the effectiveness of corrective and preventative measures. The following may be used to measure the effectiveness of the Corrective/Preventative actions:

- Removes/reduces the risk of injury/illness
- Does not make the work more stressful or difficult
- Protects all employees likely to be exposed
- Does not create external environmental hazards
- Does not create more hazards

The Senior Management Team should then measure the effectiveness of the CA based off statistics from the year. The following steps should be taken:

1. Verify that it resolves the deficiency while maintaining alignment with Duncor's strategic direction, policy and OH&S objectives.
  - a. This resolution must be documented on the Incident Investigation Form.
2. Verify that the performance, after corrective actions are implemented, resulted in a decrease in the frequency and severity of the problem.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

- a. The effectiveness of the resolution must be documented on the Incident Investigation form as a follow-up. The date of the follow-up and name and signature of the person who completed the follow-up shall be recorded.
- b. The effectiveness of the resolution shall also be documented in the H&S meeting minutes, where its effectiveness is discussed among Management and H&S Worker Representatives.

If found necessary, the system should then be revised, based off this effectiveness review, to improve the overall Corrective Action process.

### TRAINING/COMMUNICATION

All individuals are to be trained in legislative and organization specific incident reporting of injuries, incidents or near miss during Duncor’s annual orientation. All Supervisors / Forepersons and certified members that will be required to take part in the investigations will have adequate training (Basics of Supervising or equivalent) and be trained on this procedure prior to the start of work.

The Health & Safety Coordinator/Supervisor / Foreperson will communicate investigation results and corrective and preventative actions to interested parties, which include but are not limited to:

- Workers/Subcontractors
- JHSC / Worker Representative
- MOL / MOE
- WSIB
- Senior Management

Results of investigations including corrective actions and preventative measures will be communicated to workers using Toolbox Talks, posting on the H&S boards and/or meetings. A monthly Management Meeting will be held to review all incidents that have occurred within the month. The attendees of these meetings will determine if CAPAs were appropriate and effective.

### RECORDKEEPING

All first aid injury reports will be maintained on site by Duncor management. All Incident Investigations resulting in a medical injury, critical injury or lost time injury are to be maintained on site and forwarded to Duncor head office. First aids, incidents and near misses are to be reported on the monthly reporting logs maintained at head office for recordkeeping and statistical purposes.

In addition to submitting incident reports, investigation results and reports measuring the effectiveness of corrective and preventative actions are required to be kept and maintained as per Duncor’s Document & Record Control System as per Element 1.10 of this manual.

### DOCUMENTATION REQUIRED

- H&S Meeting Minutes
- Toolbox Talks
- Supervisor Weekly Inspections
- H&S Representative Monthly Inspections
- Incident Investigation Form
- Injury Report
- Motor Vehicle & Equipment Accident Report
- Near Miss Report
- MOL Notice of Incident Report



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
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<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## EVALUATION

To evaluate preventative and corrective action plans, it is a requirement that inspections after an incident should include special attention to hazards that played a role in the incident. Any new controls, that have been implemented should be documented on the inspection form and assessed for effectiveness. Workers input on the effectiveness need to be documented during these inspections or during Toolbox Talks. Monthly Health & Safety Meetings will review these inspections and evaluate the effectiveness of the preventative and corrective action plans. Effectiveness is evaluated based on a change in behaviour, displaying consistency. This procedure will be evaluated by management on an annual basis and changes will be implemented as required.

## APPLICABLE LEGISLATION

- Occupational Health and Safety Act R.S.O. 1990
- Ontario Regulations for Construction Projects, O. Reg. 213/91
- Workplace Safety and Insurance Act



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
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REVIEWED	01.23.2026
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VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 13.2 O.REG. 420/21 – SEC. 51 TO 53.1: NOTICES AND REPORTS– FATALITIES, CRITICAL INJURIES, OCCUPATIONAL ILLNESSES AND OTHER INCIDENTS

Where the incident results in a fatality or a critical injury the following actions must be completed.

### Critical Injuries Defined:

- (1) “critically injured” means an injury of a serious nature that,
- (a) places life in jeopardy,
  - (b) produces unconsciousness,
  - (c) results in substantial loss of blood,
  - (d) involves the fracture of a leg or arm but not a finger or toe,
  - (e) involves the amputation of a leg, arm, hand or foot but not a finger or toe,
  - (f) consists of burns to a major portion of the body, or
  - (g) P the loss of sight in an eye; (“gravement blessé”)

“medical attention” means treatment from a legally qualified medical practitioner or a registered nurse who holds an extended certificate of registration under the Nursing Act, 1991. (“soins médicaux”)

**Note:** If injury is serious in nature, but not known yet if critical, notify MOL immediately as such. If injury is not critical under the definition yet is serious in nature (example – broken ankle, broken wrist) notify MOL immediately and let MOL determine critical injury or not.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

**10.2.1 SECTION 51 REPORT AND SECTION 52 NOTICE**

The information listed is prescribed as information the employer must provide in a written report or written notice if,

- (a) a worker is killed or critically injured from any cause at a workplace as described in subsection 51 (1) of the Act;
- (b) a worker is disabled from performing his or her usual work or requires medical attention because of an accident, explosion, fire or incident of workplace violence at a workplace, but no person dies or is critically injured because of that occurrence as described in subsection 52 (1) of the Act; or
- (c) the employer is advised by or on behalf of a worker that the worker has an occupational illness or that a claim in respect of an occupational illness has been filed with the Workplace Safety and Insurance Board by or on behalf of the worker as described in subsection 52 (2) of the Act.

**Reporting/Notification Timing:**

- Notify Ministry of Labour immediately, the JHSC and the Union.
- File a report to the MOL within 48 hours.

**Report Information:**

1. The name, address and type of business of Duncor.
2. The name of the worker referred to.
3. The nature of the bodily injury or occupational illness.
4. For a written report involving a worker referred to in clause (1) (a),
  - a. The name and address of the constructor if the occurrence is at a project,
  - b. The address of the worker,
  - c. The nature and circumstances of the occurrence, including a description of any machinery, equipment or procedure involved,
  - d. The time, date and place of the occurrence, and
  - e. The name and address of the legally qualified medical practitioner, registered nurse who holds an extended certificate of registration under the *Nursing Act, 1991* or medical facility that is attending to or attended to the worker.
5. For a notice involving a worker referred to in clause (1) (b),
  - a. The nature and circumstance of the occurrence, including a description of any machinery, equipment or procedure involved, and
  - b. The time, date and place of the occurrence.
6. For a notice involving a worker referred to in clause (1) (c), a description of the cause or suspected cause of the occupational illness.
7. The names and addresses or other contact information of any witness to the occurrence.
8. The steps taken to prevent recurrence of further illness.

**RECORDKEEPING**

The employer or constructor shall retain a copy of a written notice or report for at least three years after the date of the notice or report is made.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

### 10.2.2 SECTION 53 NOTICES

1. The information listed in subsection (2) is prescribed as information to be provided in a written notice if,
  - (a) An accident, premature or unexpected explosion, fire, flood, or inrush of water, cave-in, subsidence or rockburst occurs at a project, site, mine or mining plant as described in subsection 53 (1) of the Act;
  - (b) The failure of any equipment, machine, device, article or thing occurs at a project site, mine or mining plant as described in subsection 53 (1) of the act that could have posed a risk to worker life, health or safety; or
  - (c) An incident prescribed under subsection (3) occurs.

#### Notice Information:

1. The name, address and type of business of Duncor.
2. For an occurrence at a project, the name and address of the constructor.
3. The time, date and place of the occurrence.
4. The nature and circumstances of the occurrence, including a description of any machinery, equipment or procedure involved.
5. The steps taken to prevent recurrence.

#### The following incidents are prescribed as incidents where notice must be provided under subsection 53 (1) of the Act:

Where O. Reg. 213/91 (Construction Projects) made under the Act applies,

- i. A worker falls a vertical distance of three metres or more,
- ii. A worker falls and the fall is arrested by a fall arrest system other than a fall restricting system,
- iii. A worker becomes unconscious for any reason,
- iv. There is accidental contact by a worker or by a worker's tool or equipment with energized electrical equipment, installations or conductors,
- v. There is accidental contact by a crane, similar hoisting device, backhoe, power shovel, or other vehicle or equipment or its load with an energized electrical conductor rated at more than 750 volts,
- vi. There is a structural failure of all or part of falsework designed by, or required by O. Reg. 213/91 to be designed by, a professional engineer,
- vii. There is a structural failure of a principle supporting member, including a column, beam, wall or truss, of a structure,
- viii. There is failure of all or part of the structural supports of a scaffold,
- ix. There is a structural failure of all or part of an earth- or water-retaining structure, including a failure of the temporary or permanent supports for a shaft, tunnel, caisson, cofferdam or trench,
- x. There is a failure of a wall of an excavation or of similar earthwork with respect to which a professional engineer has given a written opinion that the stability of the wall is such that no worker will be endangered by it, or
- xi. There is an overturning or a structural failure of all or part of a crane or similar hoisting device.

### RECORDKEEPING

The employer or constructor shall retain a copy of a written notice or report for at least three years after the date of the notice or report is made.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

### 10.2.3 SECTION 53.1 – NOTICES – ADDITIONAL NOTICES

1. Constructors or employers who submit written reports to a Director under Section 51 – 53 of the Act shall also supplement the report or notice with a professional engineer’s written opinion stating the cause of the occurrence if,
  - (a) The incident occurs at a workplace where O. Reg. 213/91 made under the Act applies and involves a failure of all or part of,
    - i. Temporary or permanent works
    - ii. A structure
    - iii. A wall of an excavation or of similar earthwork for which a professional engineer has given written opinion that the stability of the wall is such that no worker will be endangered by it
    - iv. A crane or similar hoisting device

The professional engineer’s written opinion shall be provided within 14 days after the occurrence.

#### RECORDKEEPING

The employer or constructor shall retain a copy of a written notice or report for at least three years after the date of the notice or report is made.

#### Electronic form

For greater certainty,

- (a) a requirement under sections 51 to 53.1 of the Act to send a written report or to give written notice to a Director may be satisfied by submitting a form on a website of the Government of Ontario; and
- (b) a requirement under sections 51 to 53.1 of the Act to send a written report or to give written notice to the committee, the health and safety representative and the trade union, if any, may be satisfied by providing the committee, the health and safety representative and the trade union with an electronic copy of the form referred to in clause (a).



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## ELEMENT 11: EMERGENCY PREPAREDNESS

REVISION LOG				
YEAR.REV #	REVISED BY	DATE REVISED	APPROVED BY	DESCRIPTION OF CHANGES
2021.1	J. LASTNAME	MM.DD.YYYY	MR. PRESIDENT	<ul style="list-style-type: none"> <li>X</li> <li>Y</li> <li>Z</li> </ul>
2022.1	KELCIE STEVENSON	01.2022	BRIAN DUNCAN	<ul style="list-style-type: none"> <li>HSMS2022.1 SUPERSEDED BY HSMS2023.1</li> </ul>
2023.1	KELCIE STEVENSON	01.25.2023	BRIAN DUNCAN	Included: <ul style="list-style-type: none"> <li>Roles and Responsibilities for all relevant workplace parties</li> <li>Emergency equipment requirements</li> <li>Internal and external resources chart</li> <li>Communications to relevant workplace parties</li> </ul> Withdrew: <ul style="list-style-type: none"> <li>HSMS2022.1 procedure</li> </ul>
2024.1	KELCIE STEVENSON	01.24.2024	BRIAN DUNCAN	Included: <ul style="list-style-type: none"> <li>Emergency mitigation procedure</li> </ul> Withdrew <ul style="list-style-type: none"> <li>HSMS 2023.1 procedure</li> </ul>
2025.1	KELCIE STEVENSON	01.22.2025	BRIAN DUNCAN	Modified: <ul style="list-style-type: none"> <li>Emergency Resources</li> <li>Project Specific Emergency Response Plan</li> </ul> Withdrew: <ul style="list-style-type: none"> <li>HSMS 2024.1 procedure</li> </ul>
2026.1	KELCIE STEVENSON	01.21.2026	BRIAN DUNCAN	Included: <ul style="list-style-type: none"> <li>11.2 Input to Response Plans from Relevant Parties chart</li> </ul> Modified: <ul style="list-style-type: none"> <li>11.2 Emergency Resources</li> <li>11.2 General Emergency Response Actions</li> </ul> Withdrew: <ul style="list-style-type: none"> <li>HSMS 2025.1 procedure</li> </ul>



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 11.1 EMERGENCY PREPAREDNESS POLICY STATEMENT

Duncor's Senior Management is committed to implementing, promoting and maintaining a strong and effective emergency preparedness system. Duncor management will conduct a review, prior to the start of every project, of the emergency preparedness program to ensure continual improvement by evaluating the suitability, adequacy, and effectiveness of the emergency preparedness program.

Duncor is committed to provide and train workers in the procedures that they will be required to follow in the event that there is an emergency on the construction site, or in the event that the site must be locked down due to an emergency in the area adjacent to the construction site. By providing workers with the plans, in advance and ensuring that the plans are reviewed and understood by the workers, Duncor will achieve the goal of reducing the amount of stress, chaos, suffering and loss in the event of an emergency.

### Emergency Response Actions

In the event of an emergency, Contractor/Employees will:

**Take Command** – Assign the following duties to specific personnel.

**Provide Protection** – Protect the incident scene from continuing or further hazards, for instance, traffic, operating machinery, fire or live wires.

**Give First Aid** – To the injured person as soon as possible. Only qualified individuals should administer First Aid. Qualified personnel and equipment for first aid treatment and any transportation equipment necessary for sick or injured employees will be provided, as prescribed.

**Call an Ambulance** – Call 911 and any other emergency services as required. In some locales, dialing 911 puts you in touch with all emergency services.

**Guide the Ambulance** – Meet and direct the ambulance to the incident scene.

**Get Name of Hospital** – For follow-up, find out where the injured party is being taken.

**Advise Management** – Inform Senior Management. They can then contact the required authorities and start procedures for reporting and investigating the incident/accident.

**Isolate the Incident Scene** - Barricade, rope off, or post a guard at the scene to ensure nothing is removed/replaced or changed until authorities have completed their investigation and has given the approval for re-entry.

### Senior Management / Health & Safety Coordinator

- Identify all potential emergency situations linked to the tasks performed by Duncor (found in HRA).
- Create a written emergency response plan with the collaboration of the Joint Health and Safety committee representative.
- Allow for input to the response plan from all relevant workplace parties.
- Ensure roles and responsibilities are included in Emergency Response Plans.
- Ensure that procedures are followed in the event of an emergency.
- Review annually, or as needed. Revisions shall reflect substantial changes in site conditions. The ERP shall be reviewed with the JHSC (when required), Supervisor / Foreperson / H&S Rep.
- Review the plan with the Joint Health and Safety Committee.
- Ensure required emergency resources are identified and provided to the workforce.
- Ensure emergency equipment is in place, are well-marked and regularly inspected or maintained.
- Ensure that all emergency telephone numbers are posted in a conspicuous place at the office and project.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

- Provide access to a telephone, two-way radio, or other means of communication in the event of an emergency.
- Supply and maintain any materials, equipment, or resources such as first-aid kits and fire extinguishers needed in emergency situations.
- Ensure evacuations / emergency maps are available and posted at each workplace. Maps shall clearly indicate evacuation routes and emergency equipment locations.
- Arrange transportation for medical treatment to an appropriate medical facility, if needed.
- Provide first aid facilities that are easily accessible and are supervised by employees who have a First Aid certificate and are working in the vicinity.
- Ensure that there is a plan and procedure in place for the investigation of all incidents and the correction of the hazard in a timely manner.
- Ensure all response testing of emergency-specific situations are conducted and documented at least annually. Deficiencies and corrective actions shall be documented.

#### Supervisors / Forepersons / Workers / Subcontractors

- Identify, assess and report any potential hazards that may arise due to the transportation, handling, or product installation.
- Ensure access/egress ways are maintained and are clear of any hazards, obstructions, material and debris.
- Be aware of all resources that are available in case of accident.
- Report any accidents or emergencies to superiors.
- Provide input / feedback to emergency response plans at health and safety meetings.
- Ensure subcontractors / service providers and visitors are made aware of emergency response plan and communication methods upon orientation.

#### **Workplaces may also require:**

- a) A method for sounding the alarm;
- b) A description of potential emergencies;
- c) A map of the workplace that shows evacuation routes and head count location, as well as the location of emergency equipment, first aid station and fire extinguishers;
- d) An evacuation, head count and rescue plan.

#### **Plan Testing**

At the discretion of the Supervisor / Foreperson, emergency plan rehearsals may be held. A rehearsal shall require:

- a) Notification of emergency services, all supervision and possibly prior notification of workers;
- b) A pre-determined all clear signal to allow rapid return to work;
- c) An evaluation system to determine the effectiveness of the emergency plan. (This is usually only a stopwatch timing to determine evacuation time.)

#### **Planning the Emergency Program**

If the project is located within a plant or facility which has an existing emergency and evacuation plan, the Supervisor / Foreperson must learn it and establish only those procedures necessary to complement the plant system and ensure a complete Emergency Plan for the project site.

**Brian Duncan, Vice President**  
January 23, 2026



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## 11.2 EMERGENCY PREPAREDNESS

### OVERVIEW

Emergencies can and do happen without warning. Planning in advance for such potential emergencies can save time, lives and property.

### PURPOSE

The purpose of the Emergency Response Plan is preparedness in the event of an accident, to reduce chaos and thereby minimize suffering and financial loss.

### PROGRAM GOALS

The goal of the emergency preparedness program is to provide workers with the procedures that they will be required to follow in the event that there is an emergency on the construction site, or in the event that the site must be locked down due to an emergency in the area adjacent to the construction site. By providing workers with the plan in advance and ensuring that the plan is reviewed and understood by the workers, Duncor will reduce the amount of stress, chaos, suffering and loss in the event of an emergency.

### SCOPE

This procedure applies to all Duncor work locations.

### ROLES & RESPONSIBILITIES

#### Senior Management / Health & Safety Coordinator

- Identify all potential emergency situations linked to the tasks performed by Duncor (found in HRA).
- Create a written emergency response plan.
- Ensure roles and responsibilities are included in Emergency Response Plans.
- Ensure that procedures are followed in the event of an emergency.
- Review the plan with the Joint Health and Safety Committee.
- Allow for input to the response plan from all relevant workplace parties.
- Ensure that all emergency telephone numbers are posted in a conspicuous place at the project.
- Provide access to a telephone, two-way radio, or other means of communication in the event of an emergency.
- Supply and maintain any materials, equipment, or resources such as first-aid kits and fire extinguishers needed in emergency situations.
- Ensure emergency equipment is in place, are well-marked and regularly inspected or maintained.
- Arrange transportation for medical treatment to an appropriate medical facility if needed.
- Provide first aid facilities that are easily accessible and are supervised by employees who have a First Aid certificate and are working in the vicinity. First aid facilities shall be kept clean and must be stocked with the required number of supplies, at minimum. O. Reg. 1101.
- Ensure First Aider training certificate is visibly posted on the H&S communication board.
- Emergency Response Plans shall be reviewed annually, as part of the PSERP document, or when site conditions change which may result in new potential emergency situations.
- Create evacuation / emergency maps for each workplace. These shall clearly indicate evacuation routes, internal safety equipment. This map will be posted on each Health & Safety Communication Board / Binder.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

Supervisors / Workers

- Be familiar with the roles and responsibilities in the Emergency Response Plans.
- Identify, assess and report any potential hazards that may arise due to the transportation, handling, or product installation.
- Ensure access/egress ways are maintained and are clear of obstructions, material and debris.
- Be aware of all resources that are available in case of accident.
- Report any accidents or emergencies to superiors.
- Ensure an understanding of and review emergency plans on a regular basis.
- Provide input / feedback to emergency response plans at health and safety meetings.
- Supervisor to ensure subcontractors are made aware of the emergency communication methods and protocols. These will be communicated during the site-specific orientation.

Subcontractors / Service Providers

- Be aware of Duncor's emergency response plans.
- Subcontractor Supervisors shall ensure they follow all emergency procedures as outlined during the Duncor Site-Specific Orientation.
- Subcontractors shall ensure employees are equipped with appropriate emergency response equipment.
- Subcontractors shall be aware of the availability of Duncor's emergency equipment on site.
- Subcontractors shall report any other potential emergency situations linked with the hazard assessment completed.
- Provide input to the response plans, where applicable.
- Be aware of emergency communication methods/ protocols and provide input where necessary

Visitors

- Be aware of Duncor's emergency response plans upon orientation.
- Subcontractor Supervisors shall ensure they follow all emergency procedures as outlined during the Duncor Site-Specific Orientation.

**PROCEDURE**

The Emergency Response Plan (ERP) shall be developed by Management or the Health & Safety Coordinator before the commencement of work and reviewed at least annually or as needed. All workers who will be performing work on site will be trained in the ERP to ensure they understand their roles and responsibilities. Means of communication include:

- Site-Specific Orientation
- Project Specific Emergency Response Plan
- Safety Memos
- Toolbox Talks
- Annual Evacuation Drill

**Emergency Response Plan Roles & Responsibilities**

Each project will have the following personnel:

1. Emergency Response Team (ERT)  
The composition of the ERT will be dependent on the size and complexity of the project / location. When the designated ERT Leader is unavailable, an alternate team member will be assigned to take his / her responsibilities



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

- Rescue duties will be assigned to the Supervisor, and medical duties will be assigned to the Qualified First Aider.
  - A list of emergency contacts and details will be posted on the H&S Communication Board at all times or located in the PSERP.
  - ERT members shall be familiar with their responsibilities in each ERP (if applicable).
2. Duncor / Subcontractor Supervisors
    - a. All supervisors will be responsible for maintaining head counts of their employees.
    - b. Supervisors / Forepersons may be responsible for transporting injured workers.
    - c. Determining when it is safe to return to work.
    - d. Secure evidence and complete incident investigation forms
  3. Workers / Subcontractors
    - a. Workers will not be responsible for performing duties of the ERT members. However, workers may be delegated to assist in controlling the incident or directing emergency services to an appropriate location.
    - b. Workers will be familiarized with efficiently meeting at the muster point and will be trained in potentially assisting emergency services.
  4. Health & Safety Coordinator
    - a. Responsible for ensuring internal reporting requirements are met.
    - b. Ensuring external reporting to regulatory agencies is completed where required.
    - c. Determining when it is safe to return to work.
    - d. Secure evidence and complete incident investigation forms

## Requirements

The ERP shall consist of these elements:

- Hazard identification and risk assessment
- Communication systems
- Project map and/or floor plans
- Emergency resources
- Emergency response members
- Emergency response member names and contact information
- Emergency evacuation/lockdown procedure
- Emergency evacuation drills
- Traffic control during emergencies
- Procedure for reporting incidents to regulatory agencies

The Emergency Response plan shall be reviewed, at minimum, on an annual basis, or as required to ensure new project conditions are reflected within the PSERP. Site ERP's will be reviewed and signed as part of the Project Specific Emergency Response Plan with all workers and visitors onsite. New project conditions may be communicated by other relevant parties at site-specific health and safety meetings.

## Hazard & Risk Assessments (HRA)

Major work tasks require review to identify the associated existing and potential hazards. All identified hazards shall be assessed in accordance with Duncor's Hazard Assessment, Analysis and Control Procedure. High risk hazards require inclusion of hazard-specific Emergency Response procedures. All tasks require inclusion of potential emergency situations linked with the hazard assessment which will be reviewed at least annually.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
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REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

Refer to the HRA for identification of potential emergency situations that are linked to completed hazard assessments.

**Emergency Resources**

The following are the minimum emergency resources required at all work locations that are needed to implement the emergency response plans in compliance with First Aid Regulation 1101 and identified through completed Hazard & Risk Assessments:

Internal Resources	External Resources
<ul style="list-style-type: none"> <li>• First Aid Kits / Eye Wash Stations</li> <li>• Fire extinguishers</li> <li>• Spill kits</li> <li>• Qualified First Aiders</li> <li>• Emergency response personnel</li> </ul>	<ul style="list-style-type: none"> <li>• Emergency Response Agencies</li> <li>• Utilities</li> <li>• Hospitals/Ambulance</li> </ul>

All emergency equipment shall be located in its designated area that is easily accessible, is well-marked and is regularly inspected and maintained in accordance to First Aid Regulation 1101. Locations of emergency resources can be identified on workplace evacuation / emergency maps and/or on Project Specific Emergency Response Plans. To ensure all emergency response equipment remains in effective working order, the following protocols shall apply:

- First Aid Kits are to be located inside facilities and company vehicles. First aid kits are to be inspected quarterly, at minimum, using the First Aid Kit Inspection Form.
- An appropriate number of fire extinguishers are to be located inside facilities, heavy equipment, and company vehicles. The tags attached to the fire extinguishers are to be signed and dated once a month.
- Spill kits are to be located inside facilities and in company vehicles. Each spill kit on-site is to be included in the site inspections. The health and safety coordinator is responsible for replacing spill kits as necessary.
- Eyewash bottles are to be located inside facilities and services vehicles. Eyewash stations will be inspected during site inspections.
- A certificate of a qualified first aider will be posted inside first aid kit where it will be visible to workers. Workers will also be made aware of qualified first aiders on-site during the daily hazard inspections.
- Emergency response personnel and emergency resources will be designated within the Emergency Response Plan located on the safety board inside facilities and on the Project Specific Emergency Response Plan on project sites

**Communication Systems**

To ensure effective and rapid communication of accurate information, communication systems shall include:

- Reliable communications equipment, such as air horn signals, two-way radios, or cell phones
- Communication protocol
- Employees to be training in the use of equipment and the protocol
- Subcontractors and Service Providers are to agree upon communication protocols with Duncor Supervisors/ Foreman.

**Air Horn Signals**

1. One long air horn blast – notifies all personnel of a fire / evacuation emergency
2. Three short air horn blasts – notifies First Aider of medical emergency



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

### **Establish the Emergency Evacuation Plan**

Key elements included in the Emergency Evacuation Plan are as follows:

- Identify the person responsible for initiation of emergency evacuation
- Evacuation signal
- Execution of evacuating employees
- Emergency exit routes
- Muster point location(s)
- Time required to fully execute an evacuation
- Head counts
- Steps to ensure that all employees receive emergency instruction, including those who are hearing impaired, speak English as a second language, etc.
- Accomplishment of safe re-occupancy
- Emergency evacuation drills

### **Emergency Response Drills**

- Emergency Response/ evacuation drills shall be conducted, at minimum, on an annual basis.
- Ensure Supervisors / Forepersons are notified of the Emergency Evacuation Drill.
- Supervisors / Forepersons are required to participate in the mock drills.
- If applicable, ensure businesses in the surrounding area are given notice of the mock drill as there is a potential that they may be affected by the execution.
- External emergency response agencies shall be notified before and after the drill to prevent the dispatch of emergency personnel.
- Subcontractors and visitors must be informed of the mock drills and shall participate.
- Employees who are present on the day of the mock drill shall participate.
- Designate an employee to activate the emergency signal.
- All employees must evacuate from the safest exit available and proceed to the muster point.
- The Supervisor / Foreperson shall ensure that all employees in the work area are present before proceeding to the muster point, where they will conduct a headcount.
- Upon completion, a review of the Emergency Response drill shall be conducted to ensure that the ERP functions as intended. Deficiencies must be recorded and assigned with a corrective action.
- A record of the mock drill shall be documented and filed on site for review by workers and shall be submitted to the Health & Safety Coordinator.
- A discussion of any safety drills with their subsequent documentation will occur during the following site-specific monthly health and safety meeting.
- Safety drills and any corrective actions taken will be reviewed at the annual management review.

### **General Emergency Response Actions**

In the event of an emergency, Contractor/Employees will:

**Take Command** – Assign the following duties to specific personnel.

**Provide Protection** – Protect the incident scene to prevent/minimize secondary injuries or occupational illness due to further hazards such as traffic, operating machinery, or live wires. For example:

- Control the energy source causing the emergency. Shut down equipment and/or utilities.
- Protect site from traffic, pedestrians.
- Workers to meet at muster point, or in a designated safe area.
- Preserve the accident scene; only disturb what is essential to maintain life or relieve human suffering and prevent immediate or further losses.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

**Give First Aid** – To the injured person as soon as possible. Only qualified individuals should give First Aid. Qualified personnel and equipment for first aid treatment and any transportation equipment necessary for sick or injured employees will be provided, as prescribed.

**Call an Ambulance** – Call 911 and any other emergency services as required. In some locales, dialing 911 puts you in touch with all emergency services.

**Guide the Ambulance** – Meet and direct the ambulance to the incident scene.

**Get Name of Hospital** – For follow-up, find out where the injured is being taken.

**Advise Management** – Inform Senior Management. They can then contact the required government authorities and start procedures for reporting and investigating the incident/accident.

**Isolate the Incident Scene** - Barricade, rope off, or post a guard at the scene to make sure that nothing is moved or changed until authorities have completed their investigation.

REFER TO APPENDIX A: PROJECT SAFETY AND EMERGENCY RESPONSE PLANS FOR ALL ERPs relevant.

**Input to Response Plans from Relevant Parties**

RELEVANT PARTY	INPUT / MEETING TYPE
General Contractor / Project Owner	Can provide input to relevant ERPs prior to procuring Duncor services. Where applicable, Duncor may follow the GC's or Project Owner's ERP.
Workers	Can provide input to relevant ERPs during: <ul style="list-style-type: none"> <li>• Company orientation</li> <li>• Site specific orientation</li> <li>• During Toolbox Talks</li> <li>• JHSC Meetings</li> <li>• After mock drills</li> </ul>
Subcontractor	Can provide input to relevant ERPs during: <ul style="list-style-type: none"> <li>• Prior to mobilization on Duncor work location during procurement stage</li> <li>• Site specific orientation</li> </ul>
Emergency Services	Can provide input to Duncor: <ul style="list-style-type: none"> <li>• Prior to Duncor mobilization on site.</li> </ul>

**TRAINING**

All workers and other relevant workplace parties will receive training, appropriate to their role, in the Project Emergency Response Plan during Orientation.

Management will ensure that the designated First Aider is trained in Standard First Aid and CPR.

Additional training may include:

- In the use and care of fire extinguishers at the Annual Corporate Orientation / New Employee Onboarding Orientation for all workers.
- Working at Heights (all applicable workers) and Equipment Competency Training (operators and designated rescue personnel) in the event equipment is required to perform fall rescue operations.
- Standard First Aid & CPR for the designated First Aider.
- Valid driver's license for person(s) responsible for transporting injured workers.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
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<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## COMMUNICATION

A written copy of the Emergency Response Plan will be posted on the site safety board at all work locations and communicated to all workers during orientation.

Toolbox Talks will be conducted to discuss the results of emergency response drills. This Toolbox Talk will provide workers with an opportunity to provide feedback and/or recommendations of our response plans and will be discussed at the monthly H&S meeting to ensure management's review.

All relevant information shall be communicated to all relevant workplace parties including; workers, visitors, Subcontractors, emergency response services (if required), government authorities and the community regarding emergency response.

## RECORDKEEPING

Records of all meetings, drills and reports regarding emergency planning will be kept and maintained on file at the construction site.

All records and documents are required to be kept and maintained as per Duncor's Document & Record Control System as per Element 1.10 of this manual.

## DOCUMENTATION REQUIRED

- Emergency Documents – Head Office / Site
- Emergency Response Drills
- First Aid Kit Inspection Form
- First Aid Log
- Pre-Use Equipment Inspection (if required for emergency)
- MOL Notice of Incident Report

## EVALUATION

This procedure will be evaluated by management on an annual basis and changes will be implemented as required.

## APPLICABLE LEGISLATION

- Occupational Health and Safety Act R.S.O. 1990
- Ontario Regulations for Construction Projects, O. Reg. 213/91
- Workplace Safety and Insurance Act



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
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<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## ELEMENT 12: STATISTICS & RECORDS

REVISION LOG				
YEAR.REV #	REVISED BY	DATE REVISED	APPROVED BY	DESCRIPTION OF CHANGES
2021.1	J. LASTNAME	MM.DD.YYYY	MR. PRESIDENT	<ul style="list-style-type: none"> <li>X</li> <li>Y</li> <li>Z</li> </ul>
2022.1	KELCIE STEVENSON	01.2022	BRIAN DUNCAN	<ul style="list-style-type: none"> <li>HSMS2022.1 SUPERSEDED BY HSMS2023.1</li> </ul>
2023.1	KELCIE STEVENSON	01.25.2023	BRIAN DUNCAN	Included: <ul style="list-style-type: none"> <li>Roles and Responsibilities for all relevant workplace parties</li> <li>Statistics and Records Policy Statement</li> <li>KPI's relevant to measuring OHS performance</li> <li>Process map</li> </ul> Withdrew: <ul style="list-style-type: none"> <li>HSMS2022.1 procedure</li> </ul>
2024.1	KELCIE STEVENSON	01.24.2024	BRIAN DUNCAN	Modified: <ul style="list-style-type: none"> <li>Measurement of OHS performance</li> <li>Qualitative and quantitative measurements</li> <li>Leading and lagging performance indicators</li> </ul> Withdrew: <ul style="list-style-type: none"> <li>2023.1 procedure</li> </ul>
2025.1	KELCIE STEVENSON	01.22.2025	BRIAN DUNCAN	Modified: <ul style="list-style-type: none"> <li>Communication of OHS performance</li> </ul> Withdrew: <ul style="list-style-type: none"> <li>2024.1 procedure</li> </ul>
2026.1	KELCIE STEVENSON	01.23.2026	BRIAN DUNCAN	Modified: <ul style="list-style-type: none"> <li>Process Map</li> <li>Roles and Responsibilities for Health and Safety Coordinator</li> <li>12.2 Procedure</li> <li>12.2 Communication</li> </ul> Withdrew: <ul style="list-style-type: none"> <li>2025.1 procedure</li> </ul>



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
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REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 12.1 STATISTICS & RECORDS POLICY STATEMENT

Duncor's Senior Management considers the Environment and the Health and Safety of all to be the base upon which all operations are set. Duncor recognizes that all workers have the right to a safe and healthy work environment.

Continuous improvement requires our dedication and commitment – Therefore, Duncor management is committed to the continuous improvement of our HSMS through monitoring and measuring the successes and weaknesses of qualitative and quantitative elements such as; employee training, inspections, investigation reports, minor and major incidents and other performance measures on an ongoing basis. Analysis of these indicators provide information regarding the leading and lagging elements of our Health & Safety Program. In doing so, we are able to identify which areas of the program requires attention and further improvement.

As ever-changing as the workplace environment may be, safety habits and trends often change as well. Through analysing statistics and identifying these trends, we are able to determine appropriate corrective actions.

Outlined in this program are the various types of records and key indicators that assist Duncor Management to successfully determine trends and their corrective actions. Each workplace party plays a key role in this process and they are encouraged to participate and cooperate in achieving our objectives.

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**Brian Duncan, Vice President**  
January 23, 2026



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
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VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 12.2 STATISTICS & RECORDS

### PURPOSE

The purpose of this procedure is to outline a method in which statistics and records for the company as a whole are maintained and presented for review. This allows the opportunity to identify areas of success as well as areas where improvement is required.

### SCOPE

This procedure applies to all Duncor management and Supervisors / Forepersons in office as well as on Duncor projects.

### ROLES & RESPONSIBILITIES

#### Senior Management

- Review all reports and statistics and implement improvements and changes where required.
- Ensure all elements of the action plan are adequately communicated to site level Supervisors / Forepersons, workers, contractors, subcontractors and independent operators.
- Review the action plan to ensure that recommendations are implemented.

#### Health & Safety Coordinator

- Identify areas of strength and weakness within the company.
- Compile and maintain all relevant statistical data from each Site's Supervisor / Foreperson for input in the H&S Monthly Report as per Element 1.7 Document & Record Control.
- All Monthly H&S Reports are a unification of every project / workplace. The Annual H&S Report is an amalgamation of all H&S Monthly Reports within a specified year.
- Ensure subcontractor data is collected and incorporated into the monthly H&S report, if applicable.
- Create an action plan, for the future, based on the review of records and statistics.
- Ensure all elements of the action plan are adequately communicated to site level Supervisors / Forepersons, workers, contractors, subcontractors and independent operators.
- Maintain H&S Monthly Reports to reflect ongoing collection of relevant data.
- Ensure annual H&S summary is communicated to Senior Management at the Senior Management Review Meeting.
- Ensure monthly results are communicated to relevant workplace parties.

#### Supervisors / Forepersons

- Maintain all site level records and statistics as required.
- Complete all forms and records as required.
- Implement the action plan as per your responsibilities outlined by upper management.
- Communicate required elements of the action plan to workers, contractors, subcontractors and independent operators on site.
- Review H&S report to workers/subcontractors/service providers through toolbox talk.

#### Workers

- Report all injuries, incidents, hazards, near misses, etc. to your Supervisor / Foreperson for adequate recordkeeping.
- Implement all corrective actions as communicated to you.

#### Subcontractors / Service Providers

- Report all injuries, incidents, hazards, near misses, etc. to your Supervisor / Foreperson for adequate recordkeeping. All relevant documents and records shall be compiled for submission to the Supervisor on a weekly basis.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

Visitors

- N/A

**PROCEDURE**

To successfully recognize hazards, implement controls and monitor the success of Duncor’s HSMS, qualitative and quantitative measurements must be collected and analyzed to identify trends and leading and lagging performance measures for the purpose of to identify opportunities for improving the OHSMS and assist in establishing H&S objectives, allocating resources and meeting due diligence requirements. Duncor’s Supervisors / Forepersons and Health & Safety Coordinator will be responsible for collecting the following documents and records required (where applicable):

Collection of qualitative material includes, but is not limited to:

- Completion of Safety Orientations
- Review of health and safety documentation
- Completion of JHAs
- Weekly Toolbox Talks subjects and attendance
- Training is up-to-date
- Completion of regulatory workplace inspections
- Close-out of corrective action plans
- Results of audits and inspections

Collection of quantitative material includes, but is not limited to:

- Total hours worked – Duncor employees
- Total Orientation hours – Duncor employees and Subcontractor / Service Provider hours
- Total Near Miss cases – Duncor and Subcontractor’s / Service Provider’s
- Total First Aid cases – Duncor and Subcontractor’s / Service Provider’s
- Total Medical Aid cases – Duncor and Subcontractor’s / Service Provider’s
- Total Lost Time Incident cases – Duncor and Subcontractor’s / Service Provider’s
- Total Lost Time Incident days – Duncor and Subcontractor’s / Service Provider’s
- Total Modified Work cases
- Total Modified Work days
- Total Environmental Incident cases – Duncor and Subcontractor’s / Service Provider’s
- Total Property Damage cases – Duncor and Subcontractor’s / Service Provider’s
- Total number of Agency inspections
- Total number of Agency inspections without orders to comply
- Total number of Agency inspections with orders to comply
- Total Recordable Injury Frequency
- Lost Time Incident Rate
- Severity Rate
- Compliance Rate

Lagging Indicator: [OUTPUTS] Measure the occurrence and frequency of events that occurred in the past. Reactive measures that represent the occurrence and severity of incidents after they happen. These are typically quantitative and reflect past performance; reactive in nature, measuring the effectiveness of a safety program after the facts. Examples are Lost Time, Medical and First Aid claims.

Leading Indicators: [INPUTS] Are proactive and preventive measures that can shed light about the effectiveness of safety and health activities and reveal potential problems in a safety and health program. Proactive and preventive inputs that indicate the effectiveness of safety management systems. These are often qualitative and



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, VICE PRESIDENT
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

help identify and correct issues before they result in incidents. A measure preceding or indicating a future event used to drive and measure activities carried out to prevent and control injuries. Examples included number of complete orientation/training, workplace inspections, closure rates of corrective action plans.

**Measuring OHS Performance**

The Monthly H&S Reports will include key performance indicators to measure and monitor the effectiveness of Duncor’s OHS performance. The Health and Safety Coordinator will review the H&S Reports with Senior Management at a minimum during the Annual Management Review Meeting. This will use both leading and lagging indicators and consider both quantitative and qualitative measurements for both including:

Leading Indicators	<ul style="list-style-type: none"> <li>• JHA’s</li> <li>• Safety Meetings</li> <li>• Orientations</li> <li>• Toolbox Talks</li> <li>• Workplace Inspections</li> <li>• Safety Meetings</li> <li>• Near Miss Reports</li> </ul>	Qualitative Measurements	<ul style="list-style-type: none"> <li>• Completion of reports</li> <li>• Quality of reports</li> <li>• Quality of Training</li> <li>• Results inspections</li> <li>• Completion of Corrective action plans</li> <li>• Applicability of subjects for toolbox talks and attendance</li> </ul>
		Quantitative Measurements	<ul style="list-style-type: none"> <li>• Total hours worked</li> <li>• Number of orientation hours</li> <li>• Number of Workplace Inspections completed</li> <li>• Number of safety talks completed</li> </ul>
Lagging Indicators	<ul style="list-style-type: none"> <li>• Medical Aid cases</li> <li>• First Aid Cases</li> <li>• Lost-time incidents</li> <li>• Modified workdays</li> <li>• Environmental incident cases</li> <li>• Property Damage Cases</li> <li>• MOL Orders</li> <li>• Lost Time Incident Rate</li> <li>• Severity Rate</li> <li>• Compliance Rate</li> </ul>	Qualitative	<ul style="list-style-type: none"> <li>• Frequency, trends, and types of injuries</li> <li>• Quality of corrective action plans- including corrective/ preventative actions</li> <li>• Quality of follow-up actions</li> </ul>
		Quantitative	<ul style="list-style-type: none"> <li>• Number of Injuries and Reports</li> <li>• Number of Modified Work Days</li> <li>• Number of Environmental incident cases</li> <li>• Number of property damage cases</li> <li>• Number of MOL orders</li> </ul>

**Analysis**

A thorough analysis of the quantitative and qualitative measures and statistics will identify common factors and trends in current health and safety performance. This process may include, but is not limited to the following:

- Comparison of current health and safety performance with past performance (H&S Monthly Reports-month to month and Organizational-wide year to year) using key performance indicators and statistics during the Annual Management Review.
- Analysis of all incident investigations
  - Determining the root cause and ensuring corrective and preventative actions are in place to prevent recurrence.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

- Were corrective actions effective?
- Identify if a trend exists – If a trend exists, what is required to remedy the deficiency?
- Determine modified workdays and days lost due to incidents.
- Analysis of first aid treatment records
  - Identify if a trend exists
  - Identify if additional training is required
- Workplace inspections (positive findings and deficiencies)
  - Were workplace inspections completed by all assigned personnel?
  - Were they completed at the specified frequency?
  - Identify if a trend exists
  - Identify if deficiencies were corrected in a timely manner
  - Were corrective actions effective?
- Disciplinary notices
  - Identify if a trend exists
  - Identify if additional training is required

Process Map

<b>STEP 1</b>	<b>DATA COLLECTION</b>	<ul style="list-style-type: none"> <li>● The Supervisor/Freman is responsible for collecting all qualitative and quantitative site-relevant data.</li> <li>● All qualitative data will be measured in sections H&amp;S Training, of the Monthly H&amp;S report.</li> <li>● All quantitative data will be entered numerically in section H&amp;S Control Deliverables, of the Monthly H&amp;S Report. This data will help determine key performance indicators and will allow for the Health and Safety Coordinator to analyze the health and safety performance.</li> <li>● The Health and Safety Coordinator is responsible for compiling all H&amp;S to develop a H&amp;S report that is reflective of the organization at the end of the year under Annual Statistics.</li> </ul>
	<b>ANALYSIS</b>	<ul style="list-style-type: none"> <li>● All elements will be analyzed in this section H&amp;S Analytics-Stat Review and Emergency Preparedness. The Health &amp; Safety Coordinator, and Management will determine if any trends exist in any area.</li> <li>● This report will also assist the Health &amp; Safety Coordinator to determine inspections, toolbox talks, training, monitoring, corrective actions etc. are closed/completed at specified timeframes.</li> <li>● The H&amp;S Report will assist the Heath &amp; Safety Coordinator to determine the lagging measures and will allow for Duncor to set objectives in the future by calculating the organizational benchmark (see section Company Performance Metrics &amp; H&amp;S Objectives (Goals) Tracking).</li> <li>● The Health and Safety Coordinator and Management are responsible for discussing monthly trends, which shall also be communicated to Senior Management. Senior Management and the H&amp;S Coordinator is responsible for analyzing the organizational H&amp;S performance at least annually, during the Annual Management Review Meeting to determine appropriate objectives the following year.</li> </ul>
	<b>STEP 2</b>	<b>FINDINGS, CORRECTIVE ACTIONS AND IMPLEMENTATION</b>
<b>STEP 3</b>		



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
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<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

The annual H&S Report is an amalgamation of all H&S Monthly Reports within a specified year and will be presented during the Annual Management Review as an evaluation of Duncor’s OHS performance. This information will be compared to the previous years’ data to identify if Duncor’s performance has improved or declined.

**TRAINING**

All Supervisors / Forepersons and workers are to be trained on the procedures for reporting incidents, injuries, hazards, etc. to generate the information required to compile these statistical reports.

**COMMUNICATION**

The Annual Orientation will include the results of the H&S program review, including comparison of previous years H&S performance and allow for worker participation and/or feedback. Records of communication will be maintained by the Health and Safety Coordinator.

All results will be communicated to the relevant workplace parties through:

- Management meeting
  - H&S Coordinator is responsible for communicating results to Site Supervisors.
- Toolbox Talks
  - Conducted by the Site Supervisor, information from the management meeting is communicated to the workers on site.
- Annual meeting
  - Overview of the year is analyzed by management members. These results are communicated at the company orientation to workers by Senior Management or the H&S Coordinator.

**RECORDKEEPING**

All inspections, incidents reports, and statistics generated are to remain on file.

To ensure accuracy of the measurements and statistics to be analyzed, a monthly health and safety statistic report shall be generated and submitted to the Health & Safety Coordinator along with supplementary documentation.

At the time of the meeting, Management shall ensure that meeting minutes are recorded and maintained as per Duncor’s Document & Record Control System as per Element 1.10 of this manual.

**DOCUMENTATION REQUIRED**

- First Aid Log
- Toolbox Talks
- Incident Investigation Reports
- Workplace Inspection Reports
- Monthly Health & Safety Report

**EVALUATION**

This procedure will be evaluated by management on an annual basis and changes will be implemented as required.

**APPLICABLE LEGISLATION**

- Occupational Health and Safety Act R.S.O. 1990
- Ontario Regulations for Construction Projects, O. Reg. 213/91
- Workplace Safety and Insurance Act



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## ELEMENT 13: LEGISLATION & OTHER REQUIREMENTS

REVISION LOG				
YEAR.REV #	REVISED BY	DATE REVISED	APPROVED BY	DESCRIPTION OF CHANGES
2021.1	J. LASTNAME	MM.DD.YYYY	MR. PRESIDENT	<ul style="list-style-type: none"> <li>• X</li> <li>• Y</li> <li>• Z</li> </ul>
2022.1	KELCIE STEVENSON	01.2022	BRIAN DUNCAN	<ul style="list-style-type: none"> <li>• HSMS2022.1 SUPERSEDED BY HSMS2023.1</li> </ul>
2023.1	KELCIE STEVENSON	01.25.2023	BRIAN DUNCAN	<p>Included:</p> <ul style="list-style-type: none"> <li>• Roles and Responsibilities for all relevant workplace parties</li> <li>• Legislation &amp; Other Requirements Policy Statement</li> <li>• Plan-Do-Check-Act model</li> </ul> <p>Modified:</p> <ul style="list-style-type: none"> <li>• All Occupational Health content have been relocated to this section of the manual</li> </ul> <p>Withdrew:</p> <ul style="list-style-type: none"> <li>• HSMS2022.1 procedure</li> </ul>
2024.1	KELCIE STEVENSON	01.24.2024	BRIAN DUNCAN	<p>Modified:</p> <ul style="list-style-type: none"> <li>• Phase: 4 Act model</li> </ul> <p>Withdrew:</p> <ul style="list-style-type: none"> <li>• HSMS2023.1 procedure</li> </ul>
2025.1	KELCIE STEVENSON	01.22.2025	BRIAN DUNCAN	<p>Modified</p> <ul style="list-style-type: none"> <li>• Definition of harassment and sexual harassment</li> <li>• `Phase: 1: Plan &amp; Phase 4 Act model</li> <li>• Hygiene policy</li> </ul> <p>Withdrew:</p> <ul style="list-style-type: none"> <li>• HSMS2024.1 procedure</li> </ul>
2026.1	KELCIE STEVENSON	01.21.2025	BRIAN DUNCAN	<p>Modified:</p> <ul style="list-style-type: none"> <li>• 13.11 Hygiene Policy- S.M &amp; H&amp;S Roles and Responsibilities. Record Keeping</li> <li>• 13 Replaced all “controlled products” with “hazardous products” to align with WHMIS 2015 program</li> <li>• 13.16 Added line to state JHSC meetings to be conducted virtually or in-person</li> <li>• 13.18 Added virtual harassment to workplace harassment definition and de-escalation strategies</li> </ul>



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

### 13.1 LEGISLATION & OTHER REQUIREMENTS POLICY STATEMENT

Duncor’s Senior Management considers the Environment and the Health and Safety of all to be the base upon which all operations are set. Duncor’s commitment to provide a safe and healthy work environment while ensuring compliance with legislation and other legal requirements is the foundation in which our Health and Safety Management System (HSMS) is built on.

The objective of our HSMS is to establish, implement and maintain a documented system in accordance with:

- Occupation Health and Safety Act & Regulations
- CSA Standards
- Workplace Safety and Insurance Act

All Duncor employees, our subcontractors and visitors are required to adhere to Company Rules, Policies and Procedures in this manual, the Occupational Health & Safety Act and other legal requirements. Acts of noncompliance may result in disciplinary action.

This program outlines the establishment, implementation and maintenance of our HSMS. Provided are key roles and responsibilities of each workplace party involved in the process.

In substantiation of Senior Management’s commitment to achieve a safe and healthy work environment, we will ensure regular measuring of compliance and apply appropriate corrective actions to protect our employees, subcontractors, visitors and the environment.

**Brian Duncan, Vice President**  
January 23, 2026



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 13.2 ROLES & RESPONSIBILITIES

Based on the OHS Act, the following describes responsibilities by the various individuals. These responsibilities will change as the applicable Acts may change and may occur without notice. **(See general duties chart below.)**

### 13.2.1 Managers

- Be accountable to the President for their division's performance.
- Responsible for the identification and integration of applicable legislation, regulations, standards and any other requirements in the HSMS.
- Ensure all documentation related to legislation, regulations, standards and any other requirements are up-to-date.
- Ensure the Duncor Environment Health and Safety Program is communicated to all employees through appropriate channels (e.g., Toolbox Talks, memos, etc.).
- Ensure the communication and comprehension of the Occupational Health and Safety Act and Regulations to employees.
- Ensure all relevant regulations and legislation are posted in accordance with the Occupational Health and Safety Act at each workplace.
- Hold supervision accountable for the safety performance in their respective areas.
- Ensure Health and Safety Committee meetings are held on a regular basis and issues of concern are addressed promptly.
- Communicate to employees the results of the Health and Safety Committee meetings and other pertinent issues and safety concerns through the use of the Health and Safety Bulletin Board.
- Provide training to employees as required.
- Ensure supervisory staff carries out their responsibilities as defined in the Occupational Health and Safety Act and Regulations and this program.
- Ensure workers are made aware of hazards associated with work through training, instruction and pre-job safety meetings conducted by supervision.
- Conduct formal management – employee workplace inspections.
- Create and promote safety awareness through participation in safety training, meetings and job procedures.
- Provide effective procedures for investigating occupational injuries and illnesses as well as accidents causing damage to product, equipment, and property in order to prevent recurrence.
- Conduct or designate responsibility for conducting a formal workplace inspection with the Health and Safety Worker Representative on a regular basis. Ensure problem areas are addressed promptly.
- Ensure compliance with applicable legislation through conducting inspections and audits. Evaluations of compliance shall be conducted at planned intervals and records of such evaluations shall be retained as per Element 1.7, Duncor's Document and Record Control System.

### 13.2.2 Supervisors / Forepersons

- The Supervisor / Foreperson shall have charge of their workplace and authority over the worker and meet all competency requirements set forth in legislation or by Duncor's policy.
- The Supervisor / Foreperson shall comply with all policies, Safe Work Practices / Safe Job Procedures, Standard Operating Procedures, and the Occupational Health and Safety Act, Regulations, Codes and Standards.
- The Supervisor / Foreperson shall work within the Fundamentals of Due Diligence program and shall ensure the safety and health of each worker under their direct supervision.
- The Supervisor / Foreperson shall ensure each worker under their direct supervision is competent, understands the safe work practices and safe job procedures of the work activity, potential hazards of the work, and the safety regulations that apply.
- The Supervisor / Foreperson shall ensure all workers report all incident/injuries and hazards of the workplace, as they become aware.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

- The Supervisor / Foreperson shall inspect the work areas and work activities for hazards and non-compliance issues, and take corrective action as needed, utilizing the resolution process.
- The Supervisor / Foreperson shall stop any violations of the policies procedures and regulations and utilize the resolution process to ensure all impacted parties understand their responsibilities and ensure only appropriate safe work behaviour will be tolerated.
- Ensure compliance with applicable legislation through conducting inspections and audits.

### 13.2.3 Workers

- Workers shall report to work fit and in proper condition to perform their duties in a safe and competent manner.
- No worker shall be in the possession of or enter the work site under the influence of alcohol or drugs. Possession and/or use of alcohol or drugs on the work site shall be cause for immediate dismissal and permanent removal from the work site.
- Workers shall not take part in any horseplay, pranks, fighting, harassment, vandalism, etc.
- Workers are to attend all safety training/orientation programs set forth by Duncor prior to starting any work.
- Workers shall observe and follow established Duncor Site Safety Rules, Safe Work Practices, and Safe Job Procedures.
- Workers shall be in compliance with the provisions of the Occupational Health and Safety Act and Regulations.
- Workers shall use or wear protective devices or clothing as required.
- Workers shall report any problems with equipment or machinery that may endanger personnel, to their Supervisor / Foreperson, direct Supervisor / Foreperson or workplace Health & Safety representative.
- Workers shall report any contravention of the Occupational Health and Safety Act and Regulations on the project or workplace to the Supervisor / Foreperson, direct Supervisor / Foreperson or work site health and safety representative (if established or required).
- Workers shall not remove, alter or move any labels, signs or tags.
- Workers shall never make any protective device ineffective or remove it without providing temporary protection.
- Workers shall never work in a manner that may endanger themselves or other workers.
- Workers may only work on tasks for which they have been trained to perform competently. Workers must ask for information or direction from a competent person when required.
- Workers shall maintain an orderly work area.
- Workers must report all incidents, injuries and accidents to their Supervisor / Foreperson.
- Workers must report any conditions or events such as incidents, accidents, or potential serious occurrences, where there is a potential for damage or injury regardless of its severity to their Supervisor / Foreperson.
- Workers must hold a current WHMIS training certificate and can demonstrate proof of certification.
- Workers shall comply with all emergency procedures.

### 13.2.4 Employers / Contractors

- Subcontractors must provide copies of their health and safety program to the Contractor or Employer Representative and will be forwarded to the Duncor Project Manager
- Contractors/subcontractors must provide copies of their Health and Safety program to the Project Manager for review.
- Contractors/subcontractors shall ensure all work activities comply with the Occupational Health and Safety Act and other governing regulations for the duration of the project.
- Contractors/subcontractors shall report to the Duncor Supervisor / Foreperson any contravention of the Occupational Health and Safety Act and Regulations on the project or work site.
- Contractors/subcontractors shall comply with Duncor's Contractors'/Consultants' Safety, Health & Environment Program requirements.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

- Contractors/subcontractors shall appoint a competent person as required by the Occupational Health and Safety Act and program definitions as fore person or Supervisor / Foreperson.
- Contractors/subcontractors shall review Duncor’s Safety, Health and Environment Program and ensure that workers abide by this standard as well as their own safety policy and program.
- Contractors/subcontractors shall accept all responsibility for the health and safety of his or her workers and meet the intent of Duncor’s Safety, Health and Environment Policy, Safe Work Practices, and Safe Job Procedures.
- Contractors/subcontractors shall provide a competent Supervisor / Foreperson and direct supervisors/foreman that are competent as defined in the Occupational Health and Safety Act and in safety and health matters.
- Contractors/subcontractors shall provide direct supervision of workers as necessary to support safe work, and to explain the health and safety regulations to his or her employees of the site and ensure they comply with them.
- Contractors/subcontractors shall make every reasonable effort to ensure the property is not damaged and that his or her employees and other workers are not subjected to injury as a result of activities on the projects.
- Contractors/subcontractors shall ensure, where required, that one worker is designated as the Safety Representative responsible for all matters relating to health, safety and environment.
- Contractor/Subcontractors shall follow all emergency procedures for the particular project.
- Contractor/Subcontractors are responsible to ensure that all of their own subcontractors adhere to the requirements specified in this program and the site-specific Program.
- Contractor/Subcontractors shall not make any equipment modifications or deviations from design without proper approvals.
- Contractor/Subcontractors shall correct and report any unsafe conditions or practices to the Duncor Supervisor / Foreperson, and will provide all necessary controls and guidance to persons on the work site to ensure their protection. Where necessary, contractor/subcontractors shall provide safety equipment for persons use.
- Contractor/Subcontractors work areas must be kept free of hazards.
- The contractor/subcontractors and designated site safety representatives will perform formal inspections of the project. Formal inspections will be conducted as required to identify and correct any hazardous conditions noted. A written record of all inspections and their results shall be kept on file and provided to the Duncor Project Manager.

**13.2.4.1 Subcontractor / Service Providers – Incident prevention instruction & training**

- Contractor/Subcontractors shall ensure that all employees are suitably trained in the proper work procedures and health and safety regulations pertaining to their duties.
- Educational sessions (orientations) will be conducted at a pre-start up Health and Safety meeting or meetings with all employees and/or groups of employees prior to starting their work. Supervisors / Forepersons are responsible for completing the trade ‘check-ins’ at this time.
- Further training and instruction are to be delivered as needed on an ongoing basis and prior to completing any work that may create a hazard, or any new major segment of the work.

Visitors

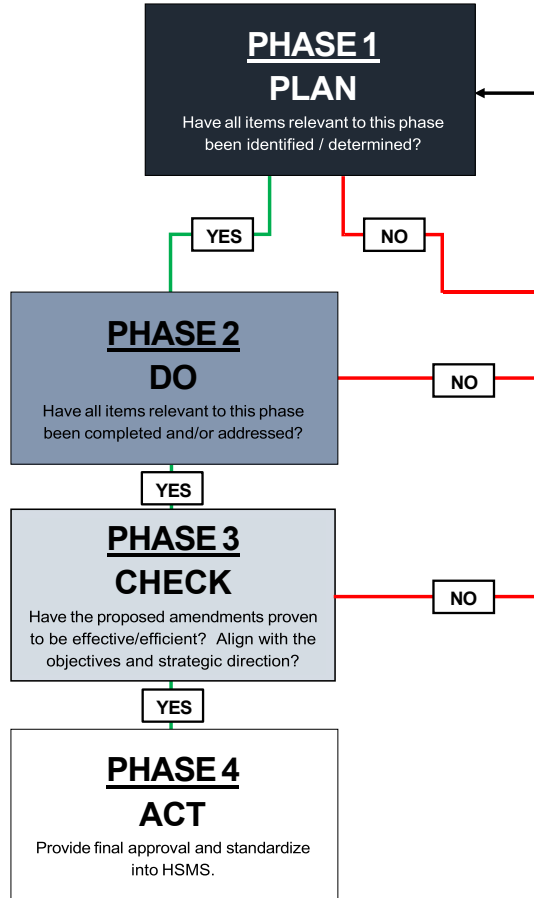
- Where applicable, comply with all applicable legislation, regulations, standards, and other requirements.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## PROCEDURE

Duncor's Health and Safety Management System (HSMS) is based on the Plan/Do/Review/Act model.



### PHASE 1: PLAN

This stage of the cycle refers to:

- Senior Management in consultation with Health and Safety Coordinator will identify and determine the list of legislation and other requirements that affect the operations of the HSMS including any revised and / or new legislation, regulations, standards and other requirements on Management Meetings Minutes and at a minimum during Annual Management Review and documented on meeting minutes.
- Identifying new processes that may be integrated into the HSMS (technology, services, etc.) and determine the ways in which these processes can affect the operations of the HSMS.
- Identifying resources required to support the organizational operations of the HSMS.
- Reviewing the OH&S Policy and setting OH&S objectives.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

During this stage, Senior Management may consult workers to (1) encourage worker consultation and participation, (2) to help identify strengths and weaknesses that may otherwise not be recognized by higher levels of authority within the organization, and (3) applying corrective actions to deficiencies.

**PHASE 2: DO**

This stage refers to developing or revising new or existing policies, processes and procedures to ensure gaps and deficiencies are addressed. Phase 2 refers to:

- Ensuring revised / new legal and regulatory commitments are appropriately integrated into the processes and procedures.
- Senior Management assigning process owners and authorities.
- Supporting the ongoing hazard assessment process by focusing on areas of improvement and by addressing any new / changed risks, opportunities, and hazards.
- Ensuring the resources required to successfully operate the HSMS is readily available to all levels of the organization.
- Providing communication and awareness training to all interested parties.
- Implementation of preventative and protective measures
- Emergency prevention
- Ensure competency of workplace parties and conduct a training needs analysis

**PHASE 3: CHECK**

This phase focusses on monitoring and measuring the effectiveness of the HSMS and process performances. This stage requires:

- Monitoring and measuring compliance with legal and regulatory requirements, industry standards and Duncor’s HSMS.
- Evaluation of the proposed amendments.
- Identification of strengths, weaknesses, and areas of opportunity for improvement within the proposed process / procedure / policy.
- Ensuring the proposed amendments continue to align with the organization’s strategic direction and intended outcomes, including continuous improvement of the HSMS.
- Identify any deficiencies and determine corrective and preventative actions, where required.

**PHASE 4: ACT**

The final phase of this cycle requires the standardization of the policy / process / procedure into Duncor’s HSMS to ensure its continual improvement. It refers to:

- Senior Management and the Joint Health & Safety Committee collectively review and approve the proposed amendments / developments.
- Once approved, the new policy / procedure is again communicated to all interested parties to ensure communication and awareness.
- Ensuring access to up-to-date legal requirements and other requirements are available as they relate to changes in the HSMS, hazard assessments and control implementations.

The Health and Safety Coordinator will regularly present inspections, evaluations and other compliance to legislation and other regulations, and standards in accordance with operations during monthly Management Meetings, quarterly to JHSC meeting and records will be documented on the meeting minutes. Duncor Senior Management shall ensure regular review and compliance of, at least annually, of legal and other requirements



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, VICE PRESIDENT
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

and standards to ensure the HSMS is reflective of such changes. These records will be documented on the Annual Management Review Meeting Minutes. Communication and training shall be provided to the workforce in a timely manner to ensure work processes are reflective of any immediate changes in legal, regulatory and industry requirements.

Senior Management in consultation with the Health and Safety Coordinator, Supervisors and the JHSC will assist in determining the list of Legislations and Other Requirements. The Health and Safety Coordinator will review the MOL website, WSIB, IHSA, trade communications and any other outlets to review any changes the legislations, regulation, standards, and other requirements. Duncor Management will consider the following legislation and regulatory requirements during the review and planning stages:

<b>Legislation</b>	<b>Applicability</b>
Occupational Health & Safety Act	Duties, Toxic Substances
Construction Projects O. Reg. 345/15, as amended by O. Reg. 213/19	Construction, confined spaces, compressed air
Industrial Establishments O. Reg. 851, as amended by O. Reg. 98/11	Air Quality & Noise
Mines and Mining Plants O. Reg. 854	Mining & Mining Plants
Workplace Safety & Insurance Act, 1997	Emergencies
Fire Code O. Reg. 213/07	Fire Prevention
Employment Standards Act, 2000 Sections 17-21, 131, 132	Hours of Work
Smoke Free Ontario Act	Smoking in the Workplace
General O. Reg. 48/06, as amended by O. Reg. 237/10	Smoking in the Workplace
Working for Workers Act	Workers Rights
<b>Emergency Preparedness</b>	
First Aid Requirements O. Reg. 1101	Emergencies
Critical Injury – Defined O. Reg. 834, as amended by O. Reg. 351/91	Emergencies
Environmental Protection Act (EPA), Sections 6 & 14	Spills
Fire Protection and Prevention Act, 2007	Emergency Plans, Lift Trucks, Flammable & combustible liquid storage, Compressed gases, fire protection
<b>Occupational Health</b>	
Workplace Hazardous Materials Information System (WHMIS) O. Reg. 860, as amended by O. Reg. 36/93	Labeling, training & SDS
Confined Spaces O. Reg. 346/15, as amended by O. 632/05	Confined Spaces
Occupational Health and Safety Awareness and Training O. Reg. 297/13	Training
Designated Substances O. Reg. 490/09, as amended by O. Reg. 148/12	Hazardous Materials
Technical Standards & Safety Act, 2000	Storage, Spills, Welding Gas
Control of Exposure to Biological or Chemical Agents O. Reg. 347/15, as amended by O. Reg. 833	Air Quality & Noise
Propane Storage and Handling O. Reg. 211/01, as amended by O. Reg. 464/10	Propane Tanks
Compressed Natural Gas O. Reg. 214/01	Compressed Gases
Liquid Fuels O. Reg. 217/01	Fuel for on-site equipment
<b>Vehicles and Equipment</b>	
Dangerous Goods Transportation Act	Vehicles on roadways
Highway Traffic Act	Vehicles on roadways
Display Screens and Hand-Held Devices O. Reg. 366/09, as amended by O. Reg. 253/12	Vehicles on roadways



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

Security of Loads O. Reg. 363/04, as amended by O. Reg. 165/12	Vehicles on roadways
Commercial Motor Vehicle Inspections O. Reg. 199/07, as amended by O. Reg. 434/12	Vehicles on roadways
Commercial Motor Vehicle Operations' Information, O. Reg. 424/97 as amended by O. Reg. 436/12	Driver Records
Hours of Service O. Reg. 555/06, as amended by O. Reg. 43/12	Driver Hours
Bill 31, Transportation Statute Law Amendment Act (Making Ontario's Roads Safer), 2015	Vehicles on Roadways
Traffic Manual Book 7 Temporary Conditions	Work on roadways

**TRAINING**

Contractors will be required to review the Duncor Contractor Safety, Health & Environment Policy in order to ensure that they are aware of their roles and responsibilities as set out in the program, contractors on Duncor sites are also required to know and understand their roles and responsibilities as outlined in the Occupational Health and Safety Act and must know and understand all applicable regulations.

**COMMUNICATION**

A written copy of the roles and responsibilities of workers, Supervisors / Forepersons, and contractors will be provided at the time of hire.

**RECORDKEEPING**

All records and documents are required to be kept and maintained as per Duncor's Document & Record Control System as per Element 1.10 of this manual.

Senior Management annual reviews of legislation and measurement of compliance shall be documented in the Annual Management Meeting Review Meeting Minutes template and or H&S Meeting Minutes template. Communications to the workforce shall be documented in the Toolbox Talks form.

All documentation related to legislation, regulations, standards and any other requirement shall be maintained, kept up-to-date and made available at each workplace in a conspicuous location.

**DOCUMENTATION REQUIRED**

- Occupational Health and Safety Act and Regulations
- Annual Management Meeting Review Meeting Minutes
- JHSC Meeting Minutes
- Toolbox Talks

**EVALUATION**

This procedure will be evaluated by management on an annual basis and changes will be implemented as required.

**APPLICABLE LEGISLATION**

See above chart.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 13.3 WHMIS (WORKPLACE HAZARDOUS MATERIAL INFORMATION SYSTEM)

### OVERVIEW

Hazardous products have the potential to cause adverse health effects to the worker as well as individuals in the vicinity of the area in which the product is being used. Proper precautionary measures are required to ensure that all possible adverse effects caused by the use, handling and storage of hazardous products are prevented.

### PURPOSE

The purpose of this procedure is to ensure the safe use, handling and storage of hazardous products in the workplace.

### SCOPE

This procedure applies to all management, Supervisors / Forepersons, workers, contractors, subcontractors and independent operators of Duncor.

### DEFINITIONS

Safety Data Sheet (SDS): A document that contains information on the potential health effects of exposure to, and safe work procedure for handling hazardous products. For the purpose of this procedure, until the transition period is complete (MSDS also refers to a SDS).

### ROLES & RESPONSIBILITIES

#### Senior Management / Health & Safety Coordinator

- Ensure all workers comply with the Occupational Health and Safety Act, the WHMIS Regulation and all other applicable regulations, codes and standards.
- Ensure all workers are provided with WHMIS training prior to the start of work.
- Ensure all hazardous products are identified.

#### Supervisors / Forepersons

- Ensure all hazardous products are adequately labeled with a Supplier or Workplace Label upon arrival to the project and thereafter. Contact the Supplier if a label requires replacement.
- Ensure SDS's are on file and available for all hazardous products on the project.
- Obtain SDS's for any hazardous products from subcontractors.
- Ensure all workers have adequate training prior to working with hazardous substances.
- Ensure required PPE is provided and all workers comply with PPE requirements.

#### Workers

- Use all hazardous products as prescribed by the regulations and SDS's.
- Ensure you have up-to-date WHMIS training and provide a copy to Duncor Supervisors / Forepersons upon site orientation.
- Ensure you use/wear all PPE as required when using or handling any hazardous product.
- Report a torn, illegible or missing Supplier Label to your Supervisor / Foreperson and stop use of the product until corrective action takes place.

#### Subcontractors / Service Providers

- Provide up-to-date SDS's for all hazardous products supplied/used on site to the Duncor Supervisor / Foreperson.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

### Visitors

- N/A

## **PROCEDURE**

All hazardous products that are present or used on a Duncor project are required to have supplier labels adhered to the product. If a product has a torn or illegible label, or is missing the label, the subcontractor using the product must contact the supplier in order to obtain a proper supplier label. The product may not be used on a Duncor project without a proper supplier label.

Any product that is decanted from its original container must have a workplace label adhered to the decanted product. The workplace label must contain the product name, precautionary information and a reference to the SDS. Any product that is made on site by the employer must also have a workplace label adhered to the container.

All products are required to have an up-to-date SDS available on file at the project. All subcontractors are required to provide a SDS for all hazardous products that they are using at the project. It is recommended that prior to using the product, all workers consult the SDS to determine proper use, precautions, and required PPE information.

## **TRAINING**

All individuals conducting work on a Duncor site are required to have WHMIS training, updated every three years. An annual review will be conducted at the company orientation.

## **COMMUNICATION**

This procedure is to be communicated to all workers upon site safety orientation.

## **RECORDKEEPING**

All SDS's are required to be maintained on site by Duncor management. All subcontractors are required to maintain copies of SDS's on site, as well as provide a copy to Duncor management. An inventory of all chemical products stored or used on any Duncor project must be maintained.

## **EVALUATION**

This procedure will be evaluated by management on an annual basis and changes will be implemented as required.

## **APPLICABLE LEGISLATION**

- Occupational Health and Safety Act R.S.O. 1990
- Ontario Regulations for Construction Projects, O. Reg. 213/91
- Workplace Hazardous Material Information System (WHMIS), O. Reg. 860



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 13.4 CHEMICAL USE, HANDLING, STORAGE AND TRANSPORT

### OVERVIEW

Controlled products have the potential to cause adverse health effects to the worker as well as individuals in the vicinity of the area in which the product is being used. Proper precautionary measures are required to ensure that all possible adverse effects caused by the use, handling, transport and storage of controlled products are prevented.

### PURPOSE

The purpose of this procedure is to ensure the safe use, handling, storage and transport of controlled products in the workplace.

### SCOPE

This procedure applies to all Duncor employees that may use, handle, store or transport-controlled products.

### PPE REQUIRED

- As per SDS

### ROLES & RESPONSIBILITIES

#### Management

- Ensure all workers comply with the Occupational Health and Safety Act, the WHMIS Regulation and all other applicable regulations, codes and standards.
- Ensure all workers are provided with WHMIS training prior to the start of work.
- Ensure all hazardous materials are identified.

#### Supervisors / Forepersons

- Ensure all controlled products are adequately labelled with a Supplier or Workplace Label upon arrival to the project and thereafter. Contact the Supplier if a label requires replacement.
- Ensure SDS's are on file and available for all controlled products on the project.
- Obtain SDS's for any controlled products from subcontractors.
- Ensure all workers have adequate training prior to working with controlled substances.
- Ensure required PPE is provided and all workers comply with PPE requirements.

#### Workers

- Use, store, handle and transport all controlled products as prescribed by the regulations and SDS's.
- Ensure you have up to date WHMIS training and provide a copy to Duncor Supervisors / Forepersons upon site orientation.
- Ensure you use/wear all PPE as required when using or handling any controlled product.

#### Subcontractors / Service Providers

- Provide up-to-date SDS's for all controlled products supplied/used on site to the Duncor Supervisor / Foreperson.

#### Visitors

- N/A



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## **PROCEDURE**

All products are to be used, handled, stored and transported as per the product's SDS and applicable regulations. Prior to the obtaining and using each product, the SDS shall be reviewed to ensure appropriate measures are taken. Requirements listed on the SDS and within the legislation will be communicated to required workers prior to using the product.

## **COMMUNICATION**

These requirements to use, handle, store or transport-controlled products will be communicated to applicable employees via JHA, toolbox talk or other approved form of communication.

## **TRAINING**

All individuals conducting work on a Duncor site is required to have WHMIS training.

## **RECORDKEEPING**

All training records are to be maintained by Duncor.

## **EVALUATION**

This procedure is to be evaluated on an annual basis by management and changes are to be implemented where required.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 13.5 SILICA EXPOSURE POLICY

### OVERVIEW

Silica is a concern in the construction industry as it is found in numerous materials that are used on a daily basis. Some of these materials include brick, concrete, cement, granite, rock, sand, and asphalt. Activities such as chipping, drilling, grinding, and sweeping can produce airborne silica that is easily inhaled by individuals. The most common route of entry of silica into the body is through inhalation.

### PURPOSE

The purpose of this procedure is to ensure adequate measures are in place to protect all individuals where silica is of concern.

### SCOPE

This procedure applies to all Duncor workers that will be exposed to silica.

### DEFINITIONS

#### Type 1 Operations

- The drilling of holes in concrete or rock that is not part of a tunneling operation or road construction.
- Milling of asphalt from concrete highway pavement.
- Charging mixers and hoppers with silica sand (sand consisting of at least 95 per cent silica) or silica flour (finely ground sand consisting of at least 95 per cent silica).
- Any other operation at a project that requires the handling of silica-containing material in a way that may result in a worker being exposed to airborne silica.
- Entry into a dry mortar removal or abrasive blasting area while airborne dust is visible for less than 15 minutes for inspection and/or sampling.
- Working within 25 meters of an area where compressed air is being used to remove silica-containing dust outdoors.

#### Type 2 Operations

- Removal of silica containing refractory materials with a jackhammer.
- The drilling of holes in concrete or rock that is part of a tunneling or road construction.
- The use of a power tool to cut, grind, or polish concrete, masonry, terrazzo or refractory materials.
- The use of a power tool to remove silica containing materials.
- Tunneling (operation of the tunnel boring machine, tunnel drilling, tunnel mesh installation).
- Tuckpoint and surface grinding.
- Dry mortar removal with an electric or pneumatic cutting device.
- Dry method dust cleanup from abrasive blasting operations.
- The use of compress air outdoors for removing silica dust.
- Entry into area where abrasive blasting is being carried out for more than 15 minutes.

#### Type 3 Operations

- Abrasive blasting with an abrasive that contains  $\geq 1$  per cent silica.
- Abrasive blasting of a material that contains  $\geq 1$  per cent silica.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## **ROLES & RESPONSIBILITIES**

### Management

- Provide resources to ensure all equipment, materials and PPE are provided and maintained in good condition.
- Inform all relevant parties of the presence of silica on the project, where required.

### Supervisors / Forepersons

- Ensure all workers are trained on and understand this procedure prior to work.
- Ensure required PPE is available for workers.

### Workers

- Ensure you are trained on and understand this procedure prior to the start of work.
- Obtain and wear all PPE as required.

### Subcontractors / Service Providers

- Subcontractor Management shall ensure all Subcontractors and Service Provider employees have appropriate PPE where applicable.
- Ensure all Subcontractor / Service Provider employees are trained on and understand this procedure prior to work.
- Ensure they are trained on and understand this procedure prior to the start of work.
- Obtain and wear all PPE as required.

### Visitors

- N/A

## **PROCEDURE**

Employers are expected to take all reasonable precautions to prevent silica dust from getting into the workplace air or where dust cannot be removed from the air, ensure all workers are prevented from inhaling the dust.

General procedures include:

- Ensuring adequate means of natural or artificial ventilation.
- Access to the work area is to be restricted to authorized persons only; Supervisor / Foreperson may be required to coordinate work between trades.
- Adequate type of respirators must be worn at all times while performing work or otherwise being in the work area if ventilation is not adequate.
- Clean up after all silica producing operations to prevent the spread of silica dust.
- Ensure clean up through processes such as vacuuming or use of damp wiping and avoid compressed air or dry sweeping.
- Ensure adequate washing facilities are available for workers.

**Specific Safe Work Practices and Safe Job Procedures are required for extensive or unique work activities to ensure all reasonable precautions are taken for the protection of the worker.**

## **TRAINING**

Workers should receive instruction in the proper use of PPE where required.

## **COMMUNICATION**

This procedure and any specific Safe Work Practices or Safe Job Procedures regarding silica are to be communicated to all individuals involved prior to the start of work



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## RECORDKEEPING

A record of all training records, Safe Work Practices, and Safe Job Procedures are to be maintained on file by Duncor management.

## EVALUATION

This procedure will be evaluated by management on an annual basis and changes will be implemented as required.

## RELEVANT LEGISLATION

- Occupational Health and Safety Act R.S.O. 1990
- Ontario Regulations for Construction Projects, O. Reg. 213/91
- Workplace Hazardous Materials Information System (WHMIS) Regulation, O. Reg. 860



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 13.6 VIBRATION CONTROL POLICY

### OVERVIEW

Using tools and equipment such as jack hammers, grinders, riveters and compactors cause workers to be exposed to vibration. Constant and repeated exposure to vibration can cause harmful effects such as hand/arm vibration syndrome, circulation problems, numbness, tingling and musculoskeletal problems. It is important to identify reduction and protection techniques to reduce the negative effects of vibration on the body.

### PURPOSE

The purpose of this procedure is to identify precautions to be taken while using tools or equipment that produces high levels of vibration.

### SCOPE

This procedure applies to all Duncor workers that may work with tools or equipment that produce high levels of vibration.

### ROLES & RESPONSIBILITIES

#### Senior Management / Health & Safety Coordinator

- Provide resources/funding for adequate tool and PPE.

#### Supervisors / Forepersons

- Ensure all tools, equipment and machinery are used as per manufacturer's requirements.
- Provide workers with PPE as per manufacturer's requirements (e.g., anti-vibration gloves).
- Ensure all equipment is adequately maintained.

#### Workers

- Ensure you are trained on and understand this procedure prior to working with vibration producing equipment.
- Wear all PPE where required.
- Use equipment as per manufacturer's instructions.
- Tag any defective equipment out of service and report to your Supervisor / Foreperson.

#### Subcontractors / Service Providers

- Subcontractor Management shall ensure all Subcontractors and Service Provider employees have appropriate PPE where applicable.
- Ensure all Subcontractor / Service Provider employees are trained on and understand this procedure prior to work.
- Ensure they are trained on and understand this procedure prior to the start of work.
- Obtain and wear all PPE as required.

#### Visitors

- N/A

### PROCEDURE

- Ensure to read all manufacturers' instructions prior to using any vibration producing equipment.
- Follow all manufacturers' guidelines and instructions.
- Wear appropriate PPE, as per the manufacturer's instructions, while using equipment.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

- Ensure proper tool maintenance, as worn-down tools may produce larger amounts of vibration.
- Follow exposure guidelines and allow for breaks away from vibrating tools and equipment.

## **TRAINING**

Workers are required to be trained as per manufacturer's requirements prior to using equipment, machinery, tools, etc.

## **COMMUNICATION**

These requirements shall be communicated to all workers using vibration producing equipment.

## **RECORDKEEPING**

All training records are to be maintained on file.

## **EVALUATION**

This procedure will be evaluated by management on an annual basis and changes will be implemented as required.

## **APPLICABLE LEGISLATION**

- Occupational Health and Safety Act R.S.O. 1990
- Ontario Regulations for Construction Projects, O. Reg. 213/91



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## 13.7 NOISE CONTROL PROCEDURE

### OVERVIEW

Exposure to excessive noise in the workplace can lead to negative health effects. Some effects resulting from excess noise include acoustic trauma, tinnitus, temporary hearing loss and permanent hearing loss. Some effects are short term, and are noticed immediately, whereas other long-term effects may not be noticed for many years.

### PURPOSE

The purpose of this procedure is to outline some preventative measures to reduce the negative effects of noise in the workplace.

### SCOPE

This procedure applies to all Duncor projects where noise exposure may exceed 85dBA.

### ROLES & RESPONSIBILITIES

#### Senior Management / Health & Safety Coordinator

- Provide resources to ensure all tools and equipment are maintained in good condition and repaired or replaced where required.

#### Supervisors / Forepersons

- Ensure all workers are trained on and understand this procedure prior to working with noise producing equipment or in loud environments.
- Ensure required PPE is provided to workers.
- Ensure all equipment and machinery is maintained in good condition.

#### Workers

- Ensure you are trained on and understand this procedure prior to working with loud equipment or tools or in noisy environments.
- Obtain and wear all PPE as required.
- Tag defective equipment out of service and report to your Supervisor / Foreperson.

#### Subcontractors / Service Providers

- Subcontractor Management shall ensure all Subcontractors and Service Provider employees have appropriate PPE where applicable.
- Ensure all Subcontractor / Service Provider employees are trained on and understand this procedure prior to work.
- Ensure they are trained on and understand this procedure prior to the start of work.
- Obtain and wear all PPE as required.

#### Visitors

- N/A

### PROCEDURE

- Ensure to read all manufacturers' instructions prior to using any equipment or tools.
- Follow all manufacturer's guidelines and instructions.
- Wear appropriate earplugs or earmuffs and any other recommended PPE while using equipment, as per manufacturer's instructions or where noise levels exceed 85dBA.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

- Ensure proper tool maintenance, as old or worn tools may create unnecessary or louder noise.
- Follow exposure guidelines and allow for breaks away from loud equipment or tools and noisy environments.

## **TRAINING**

All workers that require the use of any noise producing equipment or to work in noisy environments are required to be trained on this procedure prior to the start of work.

## **COMMUNICATION**

This procedure will be communicated to all workers through a Toolbox Talk prior to using any noise producing equipment or working in noisy environments.

## **RECORDKEEPING**

A record of all individuals trained on this procedure is to be maintained on file by Duncor.

## **EVALUATION**

This procedure will be evaluated by management on an annual basis and changes will be implemented as required.

## **APPLICABLE LEGISLATION**

- Occupational Health and Safety Act R.S.O. 1991
- Ontario Regulations for Construction Projects, O. Reg. 213/91



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 13.8 HEAT STRESS PREVENTION POLICY

### OVERVIEW

High temperatures, strenuous work activity and dehydration are some of the many factors that can lead to heat stress. Heat stress can result in heat exhaustion, or more seriously, heat stroke, which requires immediate medical attention. Factors such as body size, age, acclimatization and underlying medical issues have an impact on the effects of heat on the body.

### PURPOSE

The purpose of this procedure is to recognize, prevent and treat the symptoms of heat exhaustion and heat stroke.

### SCOPE

This procedure applies to all Duncor employees and subcontractors that will be exposed to extreme heat during work.

### SIGNS & SYMPTOMS

#### Heat Exhaustion

weakness, difficulty continuing work, headache, breathlessness, nausea or vomiting, feeling faint or actually fainting.

#### Heat Stroke

confusion, irrational behaviour, loss of consciousness, lack of sweating, hot, dry skin, abnormally high body temperature anything over 41 degrees Celsius.

### ROLES & RESPONSIBILITIES

#### Senior Management / Health & Safety Coordinator

- Ensure a heat stress procedure is written and available.
- Provide First Aid training to on site workers.
- Ensure Supervisors / Forepersons designate a cooling station and have potable water available at all times.

#### Supervisors / Forepersons

- Ensure a “designated cooling station” is selected and available at all times.
- Ensure potable water is available and accessible to all workers at all times.
- Ensure all workers are trained on this procedure prior to the start of work.
- Be able to recognize the signs and symptoms of heat stroke and address workers displaying any signs or symptoms accordingly.
- Call Emergency Medical Services or arrange transportation to the hospital where required.

#### Workers

- Ensure you are trained on and understand this procedure, as well as the signs and symptoms of heat exhaustion and heat stroke prior to the start of work.
- Report and tend to all workers displaying signs of heat exhaustion or heat stroke.
- Follow prevention strategies when working in extreme heat.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

### Subcontractors / Service Providers

- Ensure you are trained on and understand this procedure, as well as the signs and symptoms of heat exhaustion and heat stroke prior to the start of work.
- Report and tend to all workers displaying signs of heat exhaustion or heat stroke.
- Follow prevention strategies when working in extreme heat.

### Visitors

- Ensure you are trained on and understand this procedure, as well as the signs and symptoms of heat exhaustion and heat stroke prior to the start of work.
- Report any identified cases of workers in distress.
- Follow prevention strategies when working in extreme heat.

## **PROCEDURE**

### Prevention Strategies:

- Dress appropriately for the weather, wear light colours and loose clothing.
- Remain hydrated throughout the day by drinking water, Gatorade, etc.
- Avoid caffeine and alcoholic beverages.
- Apply and reapply sunscreen as required.
- Take micro-breaks, as required in a shady or cool area.
- Make use of the “designated cool zone” that is established on site.

### Heat Exhaustion:

- Move the worker to the designated cooling station on site or an area out of direct sunlight.
- Drink cool water.
- Remove boots and unnecessary clothing and loosen any remaining clothing.
- Shower or sponge wrist, feet and area behind the neck with cool water.
- If worker is not responding to the above treatment, treat the situation as heat stroke.

### Heat Stroke:

- Call 911 immediately.
- Provide the worker with immediate and aggressive general cooling.
- Spray the worker with cool water from a hose.
- Wrap the worker in cool, wet sheets and fan worker rapidly.
- Do not give anything by mouth to an unconscious individual.
- Continue this treatment until EMS arrives.

## **TRAINING**

At least one worker on site will be trained in First Aid.

## **COMMUNICATION**

This procedure shall be communicated to workers prior to working in extreme heat.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

**RECORDKEEPING**

An incident report is to be completed for all workers that experience the signs and symptoms of heat stress and is to be filed on site by Duncor management.

**EVALUATION**

This procedure will be evaluated by management on an annual basis and changes will be implemented as required.

**APPLICABLE LEGISLATION**

- Occupational Health and Safety Act R.S.O. 1990
- Ontario Regulations for Construction Projects, O. Reg. 213/91
- Workplace Safety and Insurance Act
- First Aid Regulation, O. Reg. 1101



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 13.9 COLD STRESS PREVENTION POLICY

### OVERVIEW

Cold stress results from the drop of body temperature due to the lack of protection from cold temperatures and winds. Exposure to cold causes two major health problems: frostbite and hypothermia. Individuals that are not acclimatized to the cold weather or have certain medical conditions are more susceptible to these problems than are other persons. Implementing proper controls in the workplace will help prevent the negatives effects of cold temperatures on the body.

### PURPOSE

The purpose of this procedure is to ensure workers are able to prevent, recognize and treat the signs and symptoms of cold stress.

### SCOPE

This procedure applies to all Duncor workers and contractors that will be exposed to extreme cold during work.

### SIGNS & SYMPTOMS

#### Frostbite:

- Sharp, prickling sensation.
- Skin feels waxy and numb.
- Blistering occurs for more serious conditions.

#### Hypothermia:

- **Mild:** shivering, blue lips and fingers, poor coordination.
- **Moderate:** mental impairment, confusion, poor decision-making, disorientation, inability to take precautions from the cold, heart slowdown, slow breathing.
- **Severe:** unconsciousness, heart slow down, no longer shivering, no detectable breathing.

### ROLES & RESPONSIBILITIES

#### Senior Management / Health & Safety Coordinator

- Provide First Aid training to an adequate number of Duncor workers on site.
- Ensure the Supervisor / Foreperson designates an appropriate “warm zone”.

#### Supervisors / Forepersons

- Ensure all workers are trained on this procedure prior to work.
- Designate a “warm zone” for workers to be able to take a break from the cold.
- Call EMS or arrange transportation to the nearest hospital, where required.
- Be able to recognize the signs and symptoms of cold stress and provide/ensure the worker receives appropriate treatment.

#### Workers

- Ensure you are trained on and understand this procedure and the signs and symptoms of cold stress prior to the start of work.
- Prepare for and dress appropriate for the weather and your work environment.
- Report any signs and/or symptoms of cold stress in yourself or other workers.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

Subcontractors / Service Providers

- Ensure you are trained on and understand this procedure and the signs and symptoms of cold stress prior to the start of work.
- Prepare for and dress appropriate for the weather and your work environment.
- Report any signs and/or symptoms of cold stress in yourself or other workers.

Visitors

- Ensure you are trained on and understand this procedure and the signs and symptoms of cold stress prior to the start of work.
- Prepare for and dress appropriate for the weather and your work environment.
- Report any signs and/or symptoms of cold stress in yourself or other workers.

**PROCEDURE**

**Prevention Methods:**

- Dress properly for the weather conditions – cover all exposed areas of skin, wear several layers.
- Wear synthetic fabrics next to the skin, which will wick sweat away instead of absorb it.
- Remove and change any clothing that gets wet immediately.
- Eat a high calorie meal and consume warm drinks throughout the day.
- Avoid the consumption of excessive caffeine, as it increases blood flow to extremities, thus decreasing core body temperature.
- Monitor yourself and fellow workers for signs and symptoms of cold stress. If you notice any symptoms, begin treatment as soon as possible.

**Frostbite:**

- Warm area gradually with body heat - do not rub.
- Do not thaw hands or feet. Allow medical personnel to thaw body parts.
- Apply sterile dressing to any blisters, if formed.
- Arrange transportation to the nearest medical facility.

**Hypothermia:**

- Gently move worker to designated “warm zone”.
- Keep worker awake and alert.
- Remove any wet clothing and wrap worker in warm blankets.
- Warm the body core (neck, chest, abdomen, groin) but not extremities.
- Apply direct body heat or other safe heating devices.
- Give worker warm, sweet drinks.
- Call EMS or arrange transportation to the nearest medical facility.

**TRAINING**

An adequate number of workers trained in First Aid must be present on site to assist any workers displaying any signs and symptoms of cold stress.

**COMMUNICATION**

This procedure is to be communicated to all individuals prior to working in extreme cold.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## **RECORDKEEPING**

An incident report is to be filled out for all cold stress situations and maintained on file at the site by Duncor management.

## **EVALUATION**

This procedure will be evaluated by management on an annual basis in conjunction with the Joint Health and Safety Committee and changes will be implemented as required.

## **APPLICABLE LEGISLATION**

- Occupational Health and Safety Act R.S.O. 1990
- Ontario Regulations for Construction Projects, O. Reg. 213/91
- Workplace Safety and Insurance Act
- First Aid Regulation, O. Reg. 1101



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 13.10 MUSCULOSKELETAL DISORDER (MSD) PREVENTION PROGRAM

### OVERVIEW

Musculoskeletal disorders (MSD's) are the result of many work-related factors including repetitive lifting, using excessive force, bad posture, poor lighting, poor equipment set-up, etc. The implementation of training and education in combination with the application of control methods will both prevent and improve issues related to MSD's.

### PROGRAM GOALS

- To increase MSD awareness
- To decrease the risk factors contributing to MSD's
- To promote the health and safety of all employees
- To provide proper equipment, resources and effective training on MSD prevention

### PURPOSE

The purpose of this program is to provide education regarding the risk factors and prevention strategies for MSD's and to ensure control methods and prevention strategies are implemented.

### SCOPE

This policy applies to all employees of Duncor.

### DEFINITIONS

Musculoskeletal Disorder (MSD): An injury that results from the repetitive use of the same muscle over long periods of time without rest.

### ROLES & RESPONSIBILITIES

#### Management

- Ensure an MSD prevention program is created.
- Provide resources for any equipment, training, and other resources required for the program.
- Promote and support the health and safety of all employees and prevention of MSD's.

#### Supervisors / Forepersons

- Enforce this program through regular monitoring strategies.
- Identify areas where improvement and control strategies are required.
- Investigate all accidents, injuries or near misses and apply preventative or reactive strategies to correct the situation.
- Communicate with the employer where new purchases, processes or other changes are required to be made.

#### Worker

- Work in compliance with this program at all times.
- Receive training on and understand this procedure prior to work.
- Participate in any training and education programs.
- Report any occurrences of pain, strain or injury at their earliest occurrence.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

- Report areas where improvement may be required to promote proper prevention methods.
- Report any accidents, injuries or near misses to your Supervisor / Foreperson immediately.

Subcontractors / Service Providers

- Enforce this program through regular monitoring strategies.
- Identify areas where improvement and control strategies are required.
- Investigate all accidents, injuries or near misses and apply preventative or reactive strategies to correct the situation.
- Communicate with the employer where new purchases, processes or other changes are required to be made.

Visitors

- N/A

**PROCEDURE**

Prior to starting work, all employees will be provided with information on the essential duties of their job (physical demands description) and will be made aware of the potential and actual hazards associated with lifting, lowering, pushing, pulling, carrying, handling and transporting heavy loads.

All physical limitations of each worker are to be discussed prior to employment, and those individuals that are unable to perform essential duties of their job are required to see their doctor and provide a Functional Abilities Assessment.

**Controls:**

The following controls will be considered and implemented where and when reasonably possible in order to decrease the strain and demand placed on the worker:

- The use of handling equipment.
- Reducing the frequency of lifting, lowering, pushing and pulling.
- Encouraging work to be performed at neutral levels, and minimizing work above the shoulder.
- Reduction of the weight required to be lifted or lowered.
- Participation in exercise programs to warm up muscles and to maintain personal fitness and overall health.
- Implementation of office ergonomics – proper desk heights, adequate lighting, proper chairs, etc.

**TRAINING**

Workers will be provided with training regarding ergonomics, manual material handling and the use of associated equipment prior to the start of work. Additional training will be provided for new or unique tasks and equipment.

**COMMUNICATION**

All workers will be made aware of this procedure during orientation prior to the start of work.

**RECORDKEEPING**

A record of all workers trained on this procedure will be maintained on site/in office by Duncor management.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

**EVALUATION**

This procedure will be evaluated by management on an annual basis and changes will be implemented as required.

**APPLICABLE LEGISLATION**

- Occupational Health and Safety Act R.S.O. 1990
- Ontario Regulations for Construction Projects, O. Reg. 213/91
- Workplace Safety and Insurance Act
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DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 13.11 HYGIENE POLICY

### PURPOSE

The purpose of this procedure is to outline the adequate hygiene facilities required on each project.

### ROLES & RESPONSIBILITIES

#### Senior Management / Health & Safety Coordinator

- Ensure an adequate amount of potable water and washroom facilities are provided at each project.
- Ensure that washroom facilities are cleaned and serviced as required.
- Ensure that all supplies (e.g., toilet paper, soap, cups, etc.) are provided as required.
- Constructors must ensure the availability of menstrual products on construction projects where 20 or more workers are regularly employed.
- Maintain strict, documented cleanliness of employee washrooms. Key requirements include keeping and providing accessible, date/time-stamped records of cleaning,

#### Supervisors / Forepersons

- Ensure signage indicating washroom locations are posted in a conspicuous area on site.
- Ensure an adequate number of washroom facilities are available on site, according to the number of workers present.
- Ensure washrooms are serviced as required.
- Ensure potable water source is replenished as required.
- Ensure all supplies are available and replenished as required.
- Ensure detailed logs indicating the date and time of each cleaning must be maintained.

#### Workers

- Maintain washrooms in a clean and orderly fashion.
- Report any issues or missing supplies to the Supervisor / Foreperson.

#### Subcontractors / Service Providers

- Maintain washrooms in a clean and orderly fashion.
- Report any issues or missing supplies to the Supervisor / Foreperson.

#### Visitors

- Report any issues or missing supplies to the Supervisor / Foreperson.

### PROCEDURE

#### Drinking Water

- A reasonable supply of potable water for the number of workers on site must be readily available (e.g., water bottles, water cooler, etc.).
- Cups must be available if water is supplied in a way other than individual drinking bottles.

#### Washroom Facilities

- The locations of washrooms must be posted on site in a conspicuous location.
- Washrooms are to be cleaned as often as required, and a record of servicing must be maintained on the project.
- Must have adequate lighting, heat (where possible) and ventilation.
- Must have a door that locks from the inside, and privacy and protection from weather.
- Clean-up facilities must have toilet paper, running cold and hot water (where possible), hand soap and paper towels/hand dryer.
- Where running water is not possible, hand sanitizer must be provided.
- Constructors must ensure the availability of menstrual products on construction projects where 20 or



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, VICE PRESIDENT
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

more workers are regularly employed. Products must be kept clean and hygienic. They must be provided in one or more private and reasonably accessible locations.

- The following charts indicate the number of toilets required on each project:

<b>WATER FLUSH TOILETS OR NON-RECIRCULATING CHEMICAL FLUSH TOILETS:</b>	
<b>Number of Toilets</b>	<b>Number of workers regularly employed at the project</b>
1	1-15
2	16-30
3	31-45
4	46-60
4, plus 1 additional toilet for each additional group of 15 or fewer workers	61 or more

<b>TOILETS OTHER THAN WATER FLUSH TOILETS OR NON-RECIRCULATING CHEMICAL FLUSH TOILETS:</b>	
<b>Number of Toilets</b>	<b>Number of workers regularly employed at the project</b>
1	1-10
2	11-20
3	21-30
4	31-40
4, plus 1 additional toilet for each additional group of 15 or fewer workers	41 or more

**TRAINING/COMMUNICATION**

The location of all washroom facilities on a project are to be communicated to all workers during Duncor orientation.

**RECORDKEEPING**

A record of all servicing of the facilities is to be maintained by Duncor management at each project for the duration of the project. Records must show the date and time of the two most recent cleanings. These logs must be physically posted in a conspicuous location or made available electronically, with clear instructions on how to access them.

**EVALUATION**

This procedure will be evaluated by management on an annual basis and changes will be implemented as required.

**APPLICABLE LEGISLATION**

- Occupational Health and Safety Act R.S.O. 1990
- Ontario Regulations for Construction Projects, O. Reg. 213/91



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 13.12 CONFINED SPACE PROCEDURE

### OVERVIEW

Entry to confined space includes many risks including restricted access/egress, atmospheric hazards, physical and biological hazards, process hazards, etc. In an effort to reduce and control these hazards, precautions are required to be implemented prior to and during confined space entry.

### PURPOSE

The purpose of this procedure is to ensure the health and safety of all individuals is protected upon entry to and work around a confined space.

### SCOPE

This procedure applies to all Duncor projects.

### DEFINITIONS

#### **Atmospheric hazards:**

- (a) the accumulation of flammable, combustible or explosive agents,
- (b) an oxygen content in the atmosphere that is less than 19.5 per cent or more than 23 per cent by volume, or
- (c) the accumulation of atmospheric contaminants, including gases, vapours, fumes, dusts or mists, that could,
  - (i) result in 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,

- (a) that is not both designed and constructed for continuous human occupancy, and
- (b) in which atmospheric hazards may occur because of its construction, location or contents or because of work that is done in it



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

**EXAMPLES OF A CONFINED SPACE  
AND COMMON HAZARDS**

<b>Examples of confined spaces</b>	<b>Common hazards</b>
<b>Chemical and petrochemical projects</b> Tanks, vessels, storage tanks, underground tanks, pipes, sumps, pits, any area where a worker cannot readily escape from a toxic or explosive atmosphere; any area where toxic, explosive, or oxygen deficient atmospheres may be encountered.	Toxic and explosive gases, vapours, and fumes; physical hazards of cramped entry and exit, narrow passages, and chemical spills. Difficulty in rescuing an incapacitated worker because of the configuration of the space and limited routes of access and egress.
<b>Sewage-handling systems</b> Settling tanks, sewers, manholes, pumping areas, septic tanks, digesters.	Toxic and/or explosive atmospheres such as hydrogen sulphide and methane; oxygen deficiencies.
<b>Water treatment plants</b> Settling tanks, holding tanks, equipment and wells below floor level.	Oxygen deficiency, chlorine gases, ozone; also possibly methane and hydrogen sulphide produced by decaying debris removed from lake and river water.
<b>Heavy industrial projects</b> Sumps, pits, roasters, digesters, mixers, bins, flues, ducts, conveyors, elevators, bag houses.	The hazards will depend on processes and materials involved but may include methane, hydrogen sulphide, oxygen deficiency, flammable agents, potential toxins, electrical hazards, moving parts, and engulfment due to free-flowing materials.
<b>General construction</b> Vaults, caissons.	Toxic materials such as carbon monoxide from temporary heaters in low-lying areas; refrigerants; high-voltage transmission equipment; physical hazards involving poor lighting, cramped working conditions, and the inrush of water.

**ROLES & RESPONSIBILITIES**

Constructor/Employer

- Ensure all individuals work in compliance with the Occupational Health and Safety Act, the Confined Space Regulation and all other applicable regulations, standards and codes.
- Provide confined space training for all workers.
- Provide/ensure collection of all documentation required for confined space entry and work.
- Ensure all required rescue equipment is available and appropriate for the confined space and inspected to ensure it is in good working order.
- Ensure an adequate means for entering and exiting the confined space.

Supervisors / Forepersons

- Ensure all individuals work in compliance with the Occupational Health and Safety Act, the Confined Space Regulation and all other applicable regulations, standards and codes.
- Ensure all workers are trained prior to confined space entry and work.
- Ensure all documentation is completed and submitted to the appropriate parties prior to confined space entry.
- Restrict access to the confined space through signage or barriers or other method to prevent unauthorized entry.

Workers

- Work in compliance with the Occupational Health and Safety Act, the Confined Space Regulation and all other applicable regulations, standards and codes.
- Ensure you are trained on and understand this procedure and all other training prior to confined space work/entry
- Follow all confined space procedures outlined by your employer.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

Subcontractors / Service Providers

- Ensure all individuals work in compliance with the Occupational Health and Safety Act, the Confined Space Regulation and all other applicable regulations, standards and codes.
- Ensure all workers are trained prior to confined space entry and work.
- Ensure all documentation is completed and submitted to the appropriate parties prior to confined space entry.
- Restrict access to the confined space through signage or barriers or other method to prevent unauthorized entry.
- Work in compliance with the Occupational Health and Safety Act, the Confined Space Regulation and all other applicable regulations, standards and codes.
- Ensure you are trained on and understand this procedure and all other training prior to confined space work/entry.
- Follow all confined space procedures outlined by your employer / Duncor.

Visitors

- N/A

**PROCEDURE**

**Hazard Assessment:**

All employers are required to complete a hazard assessment of the confined space prior to entry. Hazard identification must include the design, construction, location, use or contents of the space and hazards that may develop while work is done inside the confined space. Below is a list of hazards to be included as part of the assessment:

- Oxygen deficiency/oxygen enrichment
- Flammable, combustible or explosive agents
- Toxic air contaminants, smoke, fumes, and dusts
- Residual chemicals/materials
- Ignition hazards, including hot work, tools and other potential sources of ignition
- Chemical contact hazards, including acids, alkalis
- Physical hazards, including mechanical hazards, thermal stress, humidity, radiation, noise and vibration, working/walking surfaces, engulfing materials, physical obstacles, poor visibility
- Electrical hazards, including lines and cables, exposed terminals
- Traffic hazards, including pedestrian, mobile equipment
- Biological hazards, including animals and biological agents
- Other hazards related to the confined space, including piping/distribution systems, pressurizing fluids, any type of uncontrolled energy (water, liquid, vapour, electric, magnetic, gaseous, etc.), limited access and egress.

The hazards assessment is to be reviewed on a regular basis or if any conditions of the confined space change.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

**Confined Space Plan**

The confined space plan is a specific plan that will detail the specific set of measures and procedures to controls hazards identified in the confined space assessment. The plan must include provisions for on-site rescue procedures, rescue equipment, and methods of communication.

**Coordination Document**

Duncor, as the constructor, is responsible for the preparation of the coordination document. Each employer participating in confined space entry will receive a copy of the coordination document. The coordination document will ensure all workplace parties involved with confined space entry complete the required documentation and have implemented the appropriate control and training requirements.

**Entry Permits**

A separate entry permit must be issued each time work is to be performed in a confined space, before any worker enters the confined space. The entry permit must include the following:

1. The location of the confined space.
2. A description of the work to be performed there.
3. A description of the hazards and the corresponding control measures.
4. The time period for which the entry permit applies.
5. The name of the attendant
6. A record of each worker’s entries and exits.
7. A list of the equipment required for entry and rescue, and verification that the equipment is in good working order.
8. Results obtained in atmospheric testing
9. If the work to be performed in the confined space includes hot work, adequate provisions for the hot work and corresponding control measures.

A competent person shall verify that the entry permit complies with the relevant plan. The employer shall ensure that the entry permit, during the time period for which it applies, is readily available to every person who enters the confined space and to every person who performs related work with respect to the confined space.

**Attendant**

An attendant is a competent person that is to be assigned and stationed outside and near the entrance of the confined space. The attendant is not allowed to enter the confined space under any circumstances. The attendant is required to be in communication with all workers in the confined space at all times (e.g. verbally, two-way radio, etc.). The attendant is required to monitor the safety of the worker, provide assistance or contact rescue personnel as required.

**Atmospheric Testing**

The employer is responsible for appointing a competent person to conduct continuous atmospheric tests prior to entry and while the space is occupied by workers, as outlined by the confined space plan. The results of all samples must be recorded and maintained.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## **Rescue**

A written on-site rescue plan must be developed and available for immediate implementation if necessary. The rescue plan must contain provisions for the on-site rescue personnel available, training requirements, and rescue equipment required. The rescue equipment required for confined space rescue must be readily available on site, appropriate for the confined space and inspected as often as necessary.

## **TRAINING**

All workers who are to enter a confined space or perform related work are required to have training to perform the work safely. Workers are also required to have training on the plan associated with the particular confined space they are required to enter. Rescue personnel are required to have training in First Aid and CPR and on any rescue equipment that they may be required to use.

## **COMMUNICATION**

This procedure is to be communicated with all workers required to perform confined space entry or work involving a confined space.

## **RECORDKEEPING**

Copies of training records, program, plan, assessment, and permits are to be provided to Duncor and maintained on file for a period of one year after confined space entry is completed.

## **EVALUATION**

This procedure will be evaluated by management on an annual basis and changes will be implemented as required.

## **APPLICABLE LEGISLATION**

- Occupational Health and Safety Act R.S.O. 1990
- Ontario Regulations for Construction Projects, O. Reg. 213/91
- Confined Space Regulation, O. Reg. 632/05



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 13.13 AIR QUALITY TESTING PROCEDURE

### PURPOSE

The purpose of this procedure is to outline the requirements and procedures for air quality testing during use of internal combustion engines in enclosed spaces in accordance with O. Reg. 213/91, s. 47.

### SCOPE

This procedure applies to all sites where internal combustion engines will be in use in an enclosed space.

### DEFINITIONS

Periodic: Three times per day (morning, mid-day and afternoon) unless otherwise specified by the site JHSC.

Competent Person: Individual qualified because of knowledge, training, and experience to complete the task, familiar with the legislation, and is aware of potential or actual danger to health and safety in the workplace.

### ROLES & RESPONSIBILITIES

#### Senior Management

- Provide the equipment required in accordance with this procedure.

#### Supervisors / Forepersons

- Appoint a competent person to complete carbon monoxide testing as required by the procedure.
- Remove or replace any equipment that produces carbon monoxide higher than the allowable amount.

#### Competent Person

- Ensure you understand and are trained on this procedure.
- Complete the carbon monoxide testing as required and instructed by the Supervisor / Foreperson.
- Record the reading observed on the air monitor during testing.
- Advise the site Supervisor / Foreperson immediately of any reading higher than the allowable amount.

#### Subcontractors / Service Providers

- Any Subcontractors or Service providers performing air quality tests shall refer to the competent person's role and responsibilities.
- Subcontractor Management shall appoint only a competent person to complete carbon monoxide testing as required by the procedure.
- Remove or replace any equipment that produces carbon monoxide higher than the allowable amount.
- Ensure all required documentation is completed and submitted to a Duncor Supervisor / Foreperson as required.

#### Visitors

- N/A

### PROCEDURE

1. Carbon monoxide testing will be completed periodically throughout the day where internal combustion engines are being operated in an excavation, building or other enclosed space.
2. The site Supervisor / Foreperson will appoint a competent person to take the readings.
3. The competent person will record all readings.



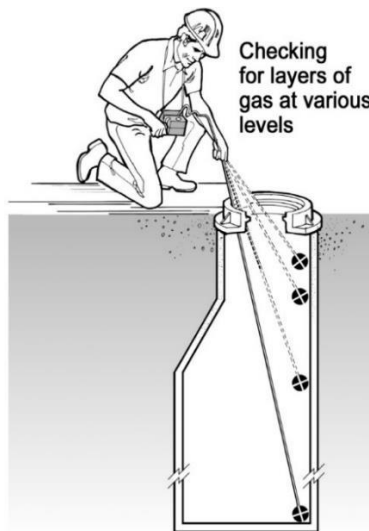
DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

4. If there are readings obtained higher than the allowable amount, the competent worker will advise the site Supervisor / Foreperson immediately.
5. If the equipment is found to be producing carbon monoxide emissions higher than the allowable amount, the site Supervisor / Foreperson will stop work. The equipment will be removed from site and replaced or repaired.

### PERFORMING ATMOSPHERIC TESTS

Entry into a confined space must be prohibited before the appropriate tests are performed. Atmospheres will be evaluated remotely from outside of the confined space before each entry. An extendable probe will be inserted through an inspection port or opening before removing the cover of the space.

Make sure you have as much of the space tested as possible, including the bottom, mid-levels, tops and corners of the space to ensure no pockets of air are without proper testing prior to entry. Some gases are heavier, and some gases are lighter, it is important to test all areas prior to entry. See diagram below:



### Step by Step:

1. Check for oxygen content
2. Check for explosive atmospheres (methane, propane, hexane, heptane, etc.)
3. Check for toxic gases and vapour



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, VICE PRESIDENT
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

**ALL THREE TYPES OF ATMOSPHERES MUST BE EVALUATED PRIOR TO ENTRY**  
**ACCEPTABLE ATMOSPHERIC LEVELS**

Explosive or flammable gas or vapour	<p>&lt; <b>25%</b> of its lower explosive limit: inspection work can be performed.</p> <p>&lt; <b>10%</b> of its lower explosive limit: cold work can be performed. (Cold work is work which does not involve</p> <ul style="list-style-type: none"> <li>- welding and cutting</li> <li>- the use of tools or equipment which can produce a spark</li> <li>- other sources of ignition.)</li> </ul> <p>&lt; <b>5%</b> of its lower explosive limit: hot work can be performed.</p>
Oxygen content	At least 19.5% but not more than 23% by volume.
Exposure to atmospheric contaminants	<p>Exposures to atmospheric contaminants must not exceed what is reasonable in the circumstances.</p> <p>The exposure limits in the regulation on "Control of Exposure to Biological or Chemical Agents" (O. Reg 833) and the "Designated Substance Regulations" (O. Reg. 490) are generally considered reasonable for protecting workers.</p>

**EFFECTS OF CARBON MONOXIDE (CO)**

<b>CO in atmosphere (parts per million)</b>	<b>Signs and symptoms</b>
10	No symptoms
25	TWA (Time-weighted average): The maximum average amount a worker is allowed to be continuously exposed to during an 8-hour work day or 40-hour work week.
70	Blood vessels widen, shortness of breath, tightness across the forehead
100	STEL (Short-term exposure limit): The maximum amount a worker is allowed to be exposed to for a 15-minute period.
120	Shortness of breath, headache with throbbing in temples
220	Headache, irritability, tiredness, impaired judgment, impaired vision, dizziness
350-520	Headache, confusion, fainting, collapse
800-1220	Unconsciousness, spasms, respiratory failure, death if exposure continues
More than 2000	Rapidly fatal (usually in less than 15 minutes)



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

**EFFECT OF OXYGEN DEFICIENCY**

<b>Oxygen Concentration</b>	<b>Effect</b>
19.5%	Minimum for safe entry
Less than 18%	Loss of judgment and coordination
Less than 15%	Loss of consciousness
Less than 12%	Sudden collapse and loss of consciousness

**VENTILATION AND PURGING**

Dangerous atmospheres are required to be purged prior to entry. This can be achieved by blowing enough fresh air in, and/or by removing the bad air and allowing clean air in. Once purging has been done, the atmosphere must be re-tested with gas detection equipment. Exhaust air should not be discharged into another work area. If using mechanical ventilation to maintain acceptable continuous atmospheric levels, you must have a warning system or alarm and exit procedure in case there is a ventilation system failure.

In the event where concentrations of explosive gas or vapour is higher than the UEL, ventilation will bring the concentration down into the explosive range. Therefore, only “explosion proof” fans must be used for the ventilation purposes of confined spaces.

**EXPLOSIVE RANGE FOR COMMON GASES AND VAPOURS**

<b>Gas/vapour</b>	<b>Lower Explosive Limit (%)</b>	<b>Upper Explosive Limit (%)</b>
Acetone	2.5	12.8
Ammonia	15.0	28.0
Benzene	1.2	7.8
Ethyl Alcohol	3.3	19.0
Gasoline	1.4	7.6
Hexane	1.1	7.5
Hydrogen Sulphide	4.0	46.0
Methane	5.0	15.0
Methyl Alcohol	6.0	36.0
Propane	2.1	9.5
Toluene	1.1	7.1
Xylene	0.9	6.7

**COMMUNICATION/TRAINING**

The competent person responsible for air testing will be trained on this procedure.

**RECORDKEEPING**

All training records are to be maintained by Duncor.

**EVALUATION**

This procedure is to be evaluated on an annual basis by management and changes are to be implemented where required.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 13.14 INFECTION CONTROL

### OVERVIEW

The risk of infection exists in all workplaces. Protecting workers from the spread of infection and disease is of utmost importance. Over the past decade, there have been numerous outbreaks that put our health at risk. Most recently, we are faced with a new virus, COVID-19, that has evolved into a pandemic. Similar to seasonal influenza, this virus attacks the respiratory system causing fever, muscle aches, sore throat and fatigue. Unlike seasonal influenza, it has proven to be exceptionally vicious in older adults and those with chronic medical conditions such as lung disease, diabetes, etc. The following control program outlines the responsibilities of all levels of the workplace to help minimize the spread of infection.

### PURPOSE

The purpose of the procedure is to ensure all employees, subtrades and visitors are 1) aware of, and use routine infection control precautions and 2) are aware of risks, recommended controls and immunizations for adults that help prevent the transmission of infections amongst employees, subtrades and visitors.

### SCOPE

This procedure applies to all Duncor employees, contactors and independent operators.

### ROLES & RESPONSIBILITIES

#### Employer / Management / Supervisors / Forepersons

- Monitor Public Health notifications, warnings and bulletins with respect to pandemics and communicable diseases.
- Provide the worker with up-to-date information with regards to the above noted items.
- If Public Health has issued a warning for communicable disease, pathogens, or contractable illness, re-assess the work area by using the Infection Control Risk Assessment document for active projects and head office.
- Provide the workers with a clear understanding of what is expected for personal hygiene and general housekeeping of the work area.
- Provide the workers with up-to-date practices and/or procedures with regards to the above items for hygiene and housekeeping practices.
- Ensure adequate wash-up facilities are available including hand sanitation products and methods.
- Respond to any concerns from workers about potential or actual infection risks or diseases.
- Ensure every reasonable measure is taken to prevent the spread of disease and illness in the workplace.
- Ensure all workers comply with the Occupational Health and Safety Act and all applicable regulations, standards, codes and company rules.

#### Workers / Subcontractors / Service Providers / Visitors

- Comply with the Occupational Health and Safety Act and all applicable regulations, standards, codes and company rules.
- Understand the practices and/or procedures for hygiene and housekeeping.
- Ensure proper handwashing and sanitation practices are adhered to.
- Review and understand the completed Infection Control Risk Assessment document.
- Notify the Supervisor / Foreperson if you feel unwell or are concerned you may have contracted illness.
- If sick, stay home and check with your family physician to see if the illness is contagious. Return to work after the contagion period has ended.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
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<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## PROCEDURE

Management will ensure that appropriate Infection Control Procedures and Policies are reviewed at least annually. Implementation of the Infection Control Risk Assessment will be conducted when Public Health declares a public health emergency for that area. A review of hygiene, sanitation and housekeeping practices will be conducted with all employees. Each employee will adhere to these precautions. This information will include but is not limited to:

- Hand hygiene - Waterless hand wash solutions will be provided where appropriate.
- Provide information about recommended and mandatory immunizations.
- Provide employees sick/illness leaves when affected by the outbreak/illness and procedures for not coming to work ill and reporting illness to Supervisors / Forepersons.

The following will be reviewed with employees:

- Emphasize the responsibility of each employee to prevent the spread of infections.
- Follow correct reporting procedures.
- Include information in employee orientation advising of hygiene practices and reporting of illness.
- Provide first aid training for a core group of employees as decided by management.
- Provide First Aid equipment and supplies in strategic places throughout facilities and projects.

## TRAINING

Instruction will be provided to Duncor's management as to how and when to apply the Infection Control Program.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 13.15 FIRST AID REQUIREMENTS

### PURPOSE

The purpose of this program is to ensure that all first aid equipment is readily available and maintained for use in the case of an emergency situation on site.

### SCOPE

This procedure applies to all Duncor projects and head office.

### ROLES & RESPONSIBILITIES

#### Employer

- Provide First Aid and all other required training for employees.
- Provide and maintain all equipment required (First Aid Kit, eye wash station, etc.).

#### Supervisor / Foreperson

- Ensure the First Aid Kit is inspected and documented as required.
- Ensure all components of the First Aid Kit are available, in good condition and restocked as required.
- Ensure Form 82 is posted in an accessible location.
- Ensure a qualified first aider is in charge of the first aid station.

#### Worker

- Report all injuries immediately to your Supervisor / Foreperson or the Designated First Aider.
- Report any missing or damaged first aid equipment to your Supervisor / Foreperson.

#### Designated First Aider

- Ensure the first aid kit and other first aid equipment is inspected on a quarterly basis.
- Alert the Supervisor / Foreperson if new material is required to be ordered.
- Assist with any first aid treatment on site.
- Ensure first aid treatment is documented.
- Attend all training sessions and ensure your First Aid training is maintained up to date.

#### Subcontractors / Service Providers

- Ensure the First Aid Kit is inspected and documented as required, and is assigned to the designated First Aider.
- Ensure all components of the First Aid Kit are available, in good condition and restocked as required.
- Ensure Form 82 is posted in an accessible location.
- Ensure a qualified first aider is in charge of the first aid station.
- Report all injuries immediately to your Supervisor / Foreperson or the Designated First Aider.

#### Visitors

- Report all injuries immediately to your Supervisor / Foreperson or the Designated First Aider.

### PROCEDURE

A first aid kit must be available on site/in office with the adequate number of supplies according to the number of workers present and in compliance to Regulation 1101. The first aid kit is to be left in the charge of a qualified first aid person who works in the immediate vicinity of the location of the first aid kit. The first aid kit and its components must be inspected on a quarterly basis to ensure all equipment is in good condition and an adequate number of supplies is present.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

All locations will consist of a first aid kit and first aid supplies as required by Regulation 1101.

### **TRAINING**

A minimum of one person per site and in office shall receive First Aid training. A copy of the First Aid certificate will be posted on or near the First Aid Kit. First Aid training tracking will be maintained on the Duncor *Training Matrix*. Individuals will be signed up for First Aid recertification at least three months prior to expiration.

### **COMMUNICATION**

This procedure will be communicated to all workers upon Duncor orientation.

### **RECORDKEEPING**

All first aid treatment and equipment inspections will be maintained on file.

### **EVALUATION**

This procedure will be evaluated by management on an annual basis and changes will be implemented as required.

### **APPLICABLE LEGISLATION**

- Occupational Health and Safety Act R.S.O. 1990
- Ontario Regulations for Construction Projects, O. Reg. 213/91
- First Aid Requirements, O. Reg. 1101



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 13.16 JOINT HEALTH & SAFETY COMMITTEE

### OVERVIEW

The Joint Health and Safety Committee serves to work together to identify hazards in the workplace, investigate incidents and provide suggestions and solutions to ensure the health and safety of all individuals in the workplace.

### PURPOSE

The purpose of this procedure is to outline the requirements of the JHSC and the duties of all individuals involved.

### SCOPE

This program applies to the Duncor head office, and all Duncor sites in Ontario that regularly employs 20 or more workers and lasts longer than 3 months.

### ROLES & RESPONSIBILITIES

#### Management

- Ensure a Joint Health and Safety Committee is established and maintained at the workplace.
- Consult with the JHSC regarding the development and evaluation of policies and programs.
- Respond to any recommendations from the JHSC in writing within 21 calendar days.
- Provide the committee with any information regarding hazards in the workplace, incidents or injuries, and any MOL orders and reports.
- Provide training for a Certified Member at each worksite, where one is required.
- Select Managerial members for each JHSC committee.
- Ensure JHSC meeting minutes are completed after each meeting, distributed to all members and available for review.
- Appoint management member(s) to the JHSC.

#### Supervisor / Foreperson

- N/A

#### Workers

- Participate in the selection of the H&S Worker Representative and/or JHSC Certified Worker Member.
- Provide input and feedback, where applicable, to the H&S Worker Representative / JHSC Certified Worker Member.

#### Certified Member

- Conduct monthly workplace inspection.
- Participate in the investigation regarding a critical injury or death on site.
- Participate in the investigation of a work refusal.

#### Subcontractor / Service Provider

- N/A

#### Visitors

- N/A



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

**JHSC FORMATION**

- The JHSC on each project shall meet on a monthly basis due to the changing conditions of the site.
- The head office JHSC shall meet on a quarterly basis.
- The meetings can take place either virtually or in a previously agreed upon location.
- A Certified Member is required on each committee on a construction project employing 50 or more workers.
- A Certified Member is required in an office employing 20 or more workers.

<b>WORKER #</b>	<b>JHSC REQUIREMENTS</b>	<b>JHSC COMPOSITION</b>
1-5	JHSC not required	N/A
6-19	JHSC not required. Health and Safety Representative required.	N/A
20-49	JHSC required, Health & Safety Representative required.	2 members minimum.
50+	JHSC required, Certified Health & Safety Representative required	4 members minimum.

At least half the members must be workers employed at the workplace who do not exercise Managerial functions.

**TRAINING**

All certified members are to receive JHSC Training Part 1 & Part 2.

**COMMUNICATION**

All JHSC minutes will be made available for review to all workers. All members are to be made aware of the date and time of the next meeting. A list of all JHSC members and their work location (or trade) must be posted in a conspicuous location on the project.

**RECORDKEEPING**

JHSC meeting minutes shall be prepared after each JHSC meeting and made readily available for review.

**EVALUATION**

This procedure will be evaluated by management on an annual basis and changes will be implemented as required.

**APPLICABLE LEGISLATION**

- Occupational Health and Safety Act R.S.O. 1990



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 13.17 WORKER HEALTH & SAFETY REPRESENTATIVE (WHSR)

### OVERVIEW

A worker representative is required where the total number of workers exceeds 5 and where there is no need for a joint health and safety committee.

### PURPOSE

The purpose of this procedure is to outline the requirements a worker representative and the duties of all individuals involved.

### SCOPE

This program applies to the Duncor head office, and all Duncor sites in Ontario that regularly employ 5 or more workers but less than 19.

### ROLES & RESPONSIBILITIES

#### Management

- Ensure compliance is met for the requirement for worker representatives at any workplace that regularly employs 5 or more workers but less than 19.
- Respond to any recommendations from the worker representative in writing within 21 calendar days.
- Provide the worker representative with any information regarding hazards in the workplace, incidents or injuries, and any MOL orders and reports.
- Ensure the worker representative is selected through their peers and not assigned by management.

#### Supervisors / Forepersons

- Ensure a worker representative is selected by their peers for any workplace that regularly employs 5 workers but less than 19.
- Accommodate the time needed for the worker representative to complete required documentation such as monthly inspections of the workplace.
- Respond to any concerns that may be brought forward by the worker representative.

#### Worker Representative

- Conduct monthly workplace inspection.
- Participate in the investigation regarding a critical injury or death on site.
- Participate in the investigation of a work refusal.
- Act as a liaison between workers and management.
- Perform duties in good faith and meet obligations under the act to the best of your ability.
- Cooperate with all applicable parties.
- Attend all required training as prescribed in accordance with the act and regulation, company requirements.
- Assist in creating and reviewing of the company policies, procedures, and programs.
- Bring forth any safety concerns to your Supervisor / Foreperson or management.

#### Subcontractor / Service Provider

- N/A

#### Visitors

- N/A



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## TRAINING

Attend all required training as prescribed in accordance with the act and regulation, company requirements.

## COMMUNICATION

All completed inspections will be made available for review to all workers. A list of all Worker Representatives and their work location (or trade) must be posted in a conspicuous location on the project and at head office.

## RECORDKEEPING

Worker Representative recommendations and completed inspections are to be made readily available for review and retained for a minimum of 3 years.

## EVALUATION

This procedure will be evaluated by management on an annual basis and changes will be implemented as required.

## APPLICABLE LEGISLATION

- Occupational Health and Safety Act R.S.O. 1990

**\*\*Note:** If legislation changes, compliance to those changes must be met as prescribed in the legislation.  
Example: mandatory training for Worker Representatives.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 13.18 WORKPLACE VIOLENCE & HARASSMENT PROGRAM

### PURPOSE

The purpose of the procedure is to outline the promotion and prevention strategies of workplace violence and harassment and to identify the appropriate response/ reporting procedures and investigation process in the case of workplace violence and harassment.

### SCOPE

This procedure applies to all Duncor employees, subcontractors, visitors, delivery persons, or other agents associated with the workplace.

### DEFINITIONS

Definitions of workplace harassment and workplace sexual harassment include harassment that occurs in a workplace through the use of information and communications technology.

Workplace Violence:

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

Workplace Harassment:

- a. a course of vexatious conduct or comment against a worker in a workplace that is known or ought reasonably to be known to be unwelcome.
- b. can include conduct occurring in any location where worker is working including remote, virtual and digital spaces for communications this can include electronic means such as email, messaging platforms, social media, video conferencing and any IT based communications used during work.
- c. workplace sexual harassment.

Workplace Sexual Harassment:

- a. 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
- b. 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.

### ROLES & RESPONSIBILITIES

#### Senior Management / Health & Safety Coordinator

- Conduct a risk assessment to identify potential workplace violence and harassment issues.
- Inform workers and the JHSC of the results of the assessment and provide copies.
- Establish procedure for the prevention, reporting, investigating, documenting and debriefing of workplace violence and harassment incidents, and develop a system to communicate the procedures as required.
- Provide information to workers regarding individuals with a history of violent behavior, if the worker can be expected to encounter the violent person in the course of their work.
- Take every reasonable precaution to protect workers in cases where any known domestic violence would likely expose a worker to physical injury in the workplace.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

- Ensure that workers are provided with information and instruction that is appropriate for the worker on the contents of the policy and program with respect to the prevention of workplace violence and harassment.
- Provide means of alerting or communicating acts of workplace violence and harassment to company personnel.
- Ensure that the company's Emergency Response Program is implemented in the event of an occurrence involving workplace violence. Provide medical assistance and/or other referrals as necessary.
- As prescribed, ensure the reporting, investigation and documentation of incidents concerning workplace violence or harassment are promptly reported to WSIB and the Ministry of Labor and any other authorities as required.
- Ensure that all incident or complaints of workplace violence or harassment are investigated.
- Ensure that all work refusal procedures are complied with during the investigation process.
- Ensure that company personnel are held accountable to the Workplace Violence & Harassment policy.
- Take all reasonable precautions to minimize or eliminate violence related hazards.
- Review workplace violence and harassment policies and program on an annual basis.
- Act respectfully at work and while conducting company business.

#### Supervisors / Forepersons

- Promote and encourage reporting incidents of violence and harassment.
- Maintain records of violence and harassment related complaint issues concerns and investigation.
- Ensure workers receive training on the workplace violence and harassment prevention program.
- Assist in investigating claims of workplace violence and harassment.
- Report to senior management, any reported or discovered acts of violence or physical threats to workers by another person as required.
- Ensure means of alerting or communicating acts of workplace violence and harassment to company personnel are available in the workplace.
- Take all reasonable precautions to minimize or eliminate violence related hazards.
- Act respectfully at work and while conducting company business.

#### Workers

- Act respectfully to others at work and while conducting company business.
- Report any instance of workplace violence or harassment immediately to their Supervisor / Foreperson.
- Cooperate during investigations of workplace violence and harassment.
- Follow all measures and procedures set out in the company's Workplace Violence & Harassment Procedure.

#### Joint Health and Safety Committee/ Worker Representative

- Shall be consulted about the development and implementation of the Workplace Violence & Harassment Program.
- Assist in the review, at least annually of the Workplace Violence & Harassment Program.
- Assist in any investigations regarding incidents arising from workplace violence or harassment.

#### Subcontractor / Service Provider

- Promote and encourage reporting incidents of violence and harassment.
- Maintain records of violence and harassment related complaint issues concerns and investigation.
- Ensure workers receive training on the workplace violence and harassment prevention program.
- Assist in investigating claims of workplace violence and harassment.
- Report to senior management, any reported or discovered acts of violence or physical threats to workers by another person as required.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
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REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

- Ensure means of alerting or communicating acts of workplace violence and harassment to company personnel are available in the workplace.
- Take all reasonable precautions to minimize or eliminate violence related hazards.
- Act respectfully at work and while conducting company business.

Visitors

- Act respectfully to others at work and while conducting company business.
- Report any instance of workplace violence or harassment immediately to the Duncor Supervisor / Foreperson.
- Cooperate during investigations of workplace violence and harassment.
- Follow all measures and procedures set out in the company's Workplace Violence & Harassment Procedure.

**PROCEDURE**

**Risk Assessment**

Management will conduct a risk assessment of the workplace to determine if any potential or actual psychosocial hazards exist that may jeopardize the health and safety of a worker or cause undue stress. An assessment must take place at the start of each project and be reassessed on an annual basis. Management will consider factors in the risk assessment including, but limited to:

- The location of work and circumstances in which work will take place that may pose risk to a worker,
- Previous experience or records of incidents of violence in the workplace,
- Occupational experience or other known circumstances in similar workplaces resulting in workplace violence,
- Causation factors associated with incidents of violence in the workplace.

**Risk Control Measures**

Management will complete the risk assessment and provide for each circumstance identified, control measures required for the protection of the worker. Where necessary, control measures must also consider and include in the prevention program other sources such as visitors, clients, subcontractors or agents associated with the workplace.

**Responding to Workplace Violence**

In the event that company personnel are involved in an incident arising from workplace violence, the following procedures are to be followed in conjunction with the company Emergency Response Program. The Supervisor / Foreperson or first on scene will assist in the intervention but will not be expected to place his/her own life in jeopardy at any time.

- Call 911 as necessary or provide first aid assistance in the event a worker is injured due to a physical altercation with an assailant.
- The injured worker, or witness to the event, whether resulting in physical injuries or not, are required to immediately contact their Supervisor / Foreperson.
- Personnel are to assist the victim and advise the aggressor(s) to stand down in a calm manner. Where possible, Supervisors / Forepersons are to ensure the assailant remains in the workplace isolated from other company personnel.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

- Where there is concern of safety to other personnel, the Supervisor / Foreperson is to advise them to immediately leave the area.
- If the assailant(s) continues to be aggressive, reasonable attempts are to be made to calm the aggressor.
- Personnel speaking to the aggressor are to show interest in resolving the issue, not laying blame.
- Personnel are to encourage the aggressor to help resolve the issue in a non-violent manner.
- Personnel are not to use any threatening body language or gestures towards an aggressor.
- At no time will any personnel attempt to physically restrain an aggressor unless not doing so poses an immediate danger to life and health.
- Supervisors / Forepersons will secure the scene of the incident and obtain written witness accounts of the occurrence.

### Summoning Immediate Assistance

Employees involved with incidents of workplace violence should immediately summon assistance. Whenever a situation in the workplace become volatile or escalates into a situation where workplace violence is likely to occur, employees should contact police or emergency assistance.

Employees who need to summon immediate assistance have a number of options including, but not limited to:

- Use the phone to dial 9-1-1 or your emergency assistance contact.
- When asked by the operator, state the service you require, for example, police, fire, or ambulance.
- Let the operator control the conversation. They have standard questions for obtaining critical information from you in a timely and orderly manner. State briefly and clearly what you have observed or why you are calling. If possible, without exposing yourself to danger, stay on the line until emergency services arrive.
- Yelling for assistance from co-worker.
- Phoning supervisor, JHSC and worker rep for immediate assistance.
- Employees should check with their supervisor for other methods or procedures to obtain immediate assistance.

### Reporting Workplace Violence

- Supervisors / Forepersons will immediately contact the local police and advise them of the incident.
- Supervisors / Forepersons will contact the worker safety representative and/or the company Joint Health and Safety Committee and advise them of the occurrence.
- As prescribed, company officials are required to report the incident to the Ministry of Labour and/or the Workplace Safety and Insurance Board as required.

## ***REFER TO ELEMENT 10, SECTION 52 REPORTING PROCEDURE***

### Responding to Incidents of Workplace Harassment

In the event that company personnel are involved in an incident arising from workplace harassment, the following procedures are to be followed in conjunction with the company Emergency Response Program. The Supervisor / Foreperson or first on scene will assist in the intervention but will not be expected to place his/her own life in jeopardy at any time.

- The witness(s) to the event, whether resulting in physical injuries or not, are required to immediately contact their Supervisor / Foreperson.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

- Personnel are to assist the victim and advise the aggressor(s) to stand down in a calm manner. Where possible Supervisors / Forepersons are to ensure the person remains in the workplace isolated from other company personnel.
- Where there is concern of safety to other personnel, the Supervisor / Foreperson will provide further instruction.
- At no time will any personnel attempt to physically restrain an aggressor but rather wait for 911 emergency response.
- Supervisors / Forepersons will secure the scene of the incident and obtain written witness accounts of the occurrence.

### De-Escalation Strategies

A positive, non-reactive approach to de-escalation helps keep everyone safe. These techniques combine verbal and non-verbal strategies to reduce tension and maintain safety. This aligns with best practices from the Canadian Centre for Occupational Health and Safety (CCOHS) and Workplace Safety & Prevention Services (WSPS).

#### General De-Escalation Principles:

Strategies for Workers:

- Remain calm and composed.
- Speak in a low, even tone.
- Avoid arguing or raising their voice.
- Maintain a safe distance (minimum 2 metres when possible).
- Avoid taking aggressive behaviour personally.
- Keep an exit route available.
- Avoid physical contact or engagement.
- Request assistance when needed.

### Four Stages of Escalation & Responses

#### Stage 1: Early Warning Signs

**Examples:** Rude language, pacing, fidgeting

**Procedure:**

- Listen actively.
- Show empathy (“I understand that this is frustrating”)
- Maintain safe distance.
- Do not dismiss concerns.
- Remain calm and professional.

#### Stage 2: Hostile Behaviour

**Examples:** Raised voice, offensive language, argumentative tone

**Procedure:**

- Maintain safe distance.
- Keep voice calm and controlled.
- Set respectful boundaries (e.g., “I want to help, but I cannot do so if you continue yelling.”).
- Alert supervisor or co-worker.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

**Stage 3: Threatening Behaviour**

**Examples:** Clenched fists, yelling, threats of violence

**Procedure:**

- Immediately summon assistance.
- Increase distance (minimum 2 metres).
- Position yourself near an exit.
- Do not engage physically.

**Stage 4: Assaultive Behaviour**

**Examples:** Pushing, shoving, striking

**Procedure:**

- Disengage immediately.
- Evacuate the area if safe to do so.
- Call emergency services (911).
- Report the incident to a supervisor as soon as possible.

**Reporting Workplace Harassment**

- Supervisors / Forepersons will respond to the occurrence and contact the head office and advise senior management of the occurrence.
- In the case that the Supervisor / Foreperson or senior management is the alleged harasser, the employee may contact the health and safety consultant.
- Supervisors / Forepersons will contact the worker safety representative and/or the company Joint Health and Safety Committee and advise them of the occurrence.

**Incident Investigation**

- Management, along with the Safety Representative or Joint Health & Safety Committee will promptly investigate all acts of reported workplace violence and/or harassment and will submit reports to Senior Management. Investigations will take into consideration factors such as statements taken from the victim, aggressor, and witnesses to the occurrence.
- The results and corrective actions will be communicated to the individual that experienced the alleged harassment and the alleged aggressor in writing.

***REFER TO ELEMENT 10, INVESTIGATIONS & REPORTING PROCEDURE***

**Follow-Up Actions**

Duncor management will take all precautions reasonable in the circumstances to ensure that workers are adequately protected from workplace violence and harassment incidents. Subsequent to a workplace violence and harassment incident, appropriate follow-up actions will be taken to ensure the prevention of a similar incident in future. Additional controls or procedures will be implemented as required, and communicated to all personnel in a reasonable time period. Note that information regarding the incident or complaint, including identifying information of the individual making the complaint or the alleged harasser, will not be disclosed unless the disclosure of such information is necessary for the purpose of the investigation or corrective action.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

If a person is disabled from performing his or her usual work because of an incident of workplace violence, Duncor must inform the MOL, the JHSC, and the Union, where applicable. The notice must contain all prescribed information and be within the legislative timeline.

**Domestic Violence**

In the case of suspected or reported domestic violence, Duncor management is committed to protecting the health and safety of all workers. All incidents of suspected or reported domestic violence will be investigated as per Duncor’s reporting and investigation procedures, and applicable control measures and follow-up actions will be implemented to ensure the health and safety of our workers is adequately protected.

**TRAINING**

All Duncor employees will receive a training session regarding the policies and procedures of workplace violence and harassment.

**COMMUNICATION**

This procedure will be communicated to all workers upon Duncor orientation. The Duncor Workplace Violence and Harassment Policy Statement will be posted in a conspicuous location in office and on all projects.

**RECORDKEEPING**

A record of all incidents involving workplace violence and harassment in the workplace will be maintained on file by Duncor management.

**EVALUATION**

This procedure will be evaluated by management on an annual basis and changes will be implemented as required.

**RELEVANT LEGISLATION**

- Occupational Health and Safety Act R.S.O. 1990
- Ontario Regulations for Construction Projects, O. Reg. 213/91
- Workplace Safety and Insurance Act



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APPROVED BY	BRIAN DUNCAN, VICE PRESIDENT
REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

## 13.19 RETURN TO WORK PROCEDURE

### PURPOSE

The purpose of this procedure is to ensure the early and safe return to work through gainful employment of any Duncor worker suffering from a work-related disabling injury.

### PROGRAM GOALS

The RTW Program has two functions:

1. To prevent the workers from losing time due to workplace injuries (achieved with the use of the WSIB Functional Abilities Form, provided at the initial stage by the Treating Medical Physician.
2. To return workers to gainful employment as soon as medically authorized. This will be completed on 2 levels;
  - a) permanently modified work
  - b) temporary modified work

### SCOPE

This procedure applies to all individuals employed by Duncor.

### ROLES & RESPONSIBILITIES

#### Senior Management

- Support and promote early and safe return to work.

#### Health & Safety Coordinator

- Determine in consultation with the employer and Supervisor / Foreperson, a modified position for the injured worker.
- Monitor the progress of the injured workers' modified duties by ensuring medical follow-up is obtained.
- Liaise with the injured worker's physician, WSIB case Manager, and injured worker if necessary. Frequency of contact will be determined on a case-by-case basis.
- Ensure all required Duncor forms and WSIB forms are completed and submitted in a timely manner.
- Develop in consultation with the workers treating agency and the immediate Supervisor / Foreperson a modified duty program.
- Determine and maintain medical monitoring and treatment with the use of a Functional Ability Form (FAF).
- Conduct an annual self-assessment of the Return to Work program. Findings of assessment will be reviewed and changes will be implemented as necessary.
- Develop any new programs or improve existing ones as indicated through the assessment.
- Track performance through an annual review of data and statistics.

#### Supervisors / Forepersons

- Advise the employee of the availability of modified duties or transitional work programs and provide the required forms.
- Assist in the creation and support of the injured worker's modified duty program.
- Maintain communication with the worker on modified duty and monitor the progress and effectiveness, on an individual case-by-case basis.
- Communicate with the injured worker as necessary and document this information.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

Injured Worker

- Maintain contact with immediate Supervisor / Foreperson and health and safety Manager.
- Communicate any concerns to their Supervisor / Foreperson.
- Obtain all necessary documents from their medical practitioner.
- Fill out and submit any forms to WSIB, Duncor, etc.
- Ensure that scheduled rehabilitation activities such as physical therapy or doctor’s appointments are continued while on modified duty.

WSIB

- Process claims on a timely basis.
- Act as a resource.
- Act as mediator during dispute.
- Ensure all parties cooperate in the early and safe return to work process.
- Follow the Workplace Safety Insurance Act.

Medical Practitioner

- Provide up to date medical information.
- Fill out forms as requested.
- Act as a resource.

Subcontractors / Service Providers

- N/A

Visitors

- N/A

**PROCEDURE**

**RTW Program Features**

The RTW Program is divided into two stages:

1. To ensure that all minor incidents requiring first-aid and/or medical attention do not result in lost time incidents.
2. The second stage will focus on helping injured workers return to work as quickly as possible through modified jobs, which will accommodate the injury sustained in a workplace incident. This will include temporary RTW activities, as well as permanent RTW activities.

**Program Implementation**

The Safety Manager will be responsible for communicating, organizing and monitoring the implementation of the RTW Program.

The following are a list of steps that are necessary for the successful development and implementation of the RTW Program.

**Program Steps**

When a workplace incident occurs, employees must receive prompt first-aid treatment and when required, medical treatment by a medical physician.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## Injured Worker Re-Integration

The injured worker's Supervisor / Foreperson and the Project Manager will help ensure that the re-integration for the injured worker into the workplace is done effectively. The requirements listed on the workers Functional Abilities Form must first be met (e.g., changes in work activities, lifting or bending, climbing, etc.).

### Upon Injury

1. Provide immediate assistance to the worker. Call 911 if necessary and implement the emergency response plan.
2. The Supervisor / Foreperson is to provide the injured worker with the Return to Work package (letter to medical practitioner and FAF).
3. The Supervisor / Foreperson is to inform the health and safety Manager of the worker's injury and the Health & Safety Coordinator is to initiate the Return to Work procedure once the worker is ready for modified duties.

### Upon the injured workers return:

1. The workers Supervisor / Foreperson must meet with the injured worker to welcome him/her back to the workplace.
2. The injured worker must be provided with a copy of the RTW Job Description and the Physical Demands Form, followed by a full explanation as to why and how the program will assist the worker in returning to his/her normal pre-incident job responsibilities.
3. Assure the worker that he/she will be able to return to their normal job activities, once the clearance has been given (in writing) by the attending physician or the WSIB case Manager.
4. Instruct and observe the worker to ensure the worker does not exceed the physical restrictions outlined in the RTW job description.
5. Instruct the worker to immediately notify their Supervisor / Foreperson of any difficulties, encountered while performing their RTW duties.
6. Ensure the worker is given opportunity to discuss any concerns they may have regarding the program and the job description.
7. The worker must be taken to the work area and advised of the changes made to his/her work area and activities (e.g., additional safety precautions, devices, temporary modifications).
8. After verbal and written instruction has been provided, the injured worker should then begin their new activities while in the presence of their Supervisor / Foreperson. The worker should be observed for a while to ensure the job activities that are being performed does not exceed the worker's physical restrictions and to ensure that difficulties are not encountered.

**Note:** If the worker does not comprehend English, have a co-worker translate the information during the meeting.

### Follow-Up

After the injured worker has been re-integrated into the workforce, it is crucial that the RTW program include follow-up. Through the follow-up process, the Supervisor / Foreperson will be able to evaluate the progress of the injured worker and the effectiveness of the worker's RTW program.

The worker's Supervisor / Foreperson will perform follow-up activities with the worker and report the findings to the Project Manager and Health & Safety Coordinator. The Supervisor / Foreperson will perform the follow-up function using the follow-up checklist.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

### **First Day Back**

- After the initial hour of work, the Supervisor / Foreperson will meet with the worker to discuss the progress and the comfort levels of the worker when performing the required tasks.
- The Supervisor / Foreperson will instruct the worker to report back to the Supervisor / Foreperson during lunch and break activities. During these meetings, the Supervisor / Foreperson will document findings in the Follow-up Checklist and when required, involve the Project Manager if it is found that the RTW job activities are too demanding and therefore require adjustment.

### **Daily Follow-Up**

- The worker will report to the Supervisor / Foreperson at the beginning, and the end of the shift.

### **Weekly Follow-Up**

- At the end of each week the worker will complete RTW progress form, and when required the Supervisor / Foreperson will assist in the completion of the form.
- The Supervisor / Foreperson will then forward the completed form to the Project Manager and Health & Safety Coordinator.

### **Bi-Weekly Follow-Up**

- The Supervisor / Foreperson will arrange for the injured worker to meet with the attending physician to discuss the progress of the injured worker, and will provide the Project Manager and Health & Safety Coordinator with a written report.

### **Changes to the RTW Job Description**

Changes in the worker's RTW job description may be required in order to accommodate:

- Difficulties being encountered by the worker,
- Progress or deterioration in the physical abilities of the injured worker,
- Production requirements (e.g., transfer to another job).

### **Physical Rehabilitation**

If, and when required, workers in the RTW Program will be encouraged to receive rehabilitation treatment for their injuries. The Supervisor / Foreperson will work with the employee and the attending physician to develop a schedule for the rehabilitation treatment.

### **Case Closure**

Upon the expiration of modified duties and clearance from medical practitioner, the Health & Safety Coordinator will have a meeting with the injured worker to ensure that he/she is prepared to return to the pre-injury job. Documentation will be maintained to ensure the case is officially closed.

### **Re-Integration to the Pre-Incident Job**

Upon completion of the RTW Program, the injured worker must be returned to their normal pre-incident job. In the event that the job has been eliminated, the employee will be placed in a similar type of position.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
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<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

### **Obligation to Re-employ Injured Workers**

Duncor recognizes its duty to re-employ injured workers under the following circumstances:

- Up to two years from the date of injury,
- Up to one year after the worker is medically able to do the essential duties of the pre-injury job,
- The date a worker declines an offer of work,
- The date the worker reaches the age of 65.

### **Non-Occupational Injury/ Illness**

Duncor will take every reasonable step to ensure that any worker suffering from a non-occupational injury or illness is provided with a job suitable to their abilities. This scenario will be treated on a case-by-case basis.

### **Privacy**

Note that all medical documentation and information is private information under the Freedom of Information and Protection and Privacy Act. Those privy to employees' medical information are to ensure that this information is kept private. All reasonable efforts will be taken to ensure that RTW paperwork is maintained.

### **TRAINING**

All workers, Supervisors / Forepersons and management of Duncor will be trained on this procedure upon Duncor orientation. All management and Supervisors / Forepersons responsible for the Return to Work implementation will receive training regarding their specific duties in the Return to- Work process.

### **RECORDKEEPING**

A record of all completed WSIB forms, incident report forms, modified work offers and modified work schedules must be maintained on file by Duncor management. All records of communication between the injured worker and the Return to Work mediator must be maintained.

### **COMMUNICATION**

Communication between the worker and Return to Work mediator must be maintained throughout the duration of the worker's time off as well as during the course of modified duties to assess progress, problems, etc. A record of communication must be maintained by the Return to Work mediator.

### **DOCUMENTATION REQUIRED**

- Modified Work Documents

### **EVALUATION**

This procedure will be evaluated by management on an annual basis and changes will be implemented as required.

### **APPLICABLE LEGISLATION**

- Occupational Health and Safety Act R.S.O. 1990
- Ontario Regulations for Construction Projects, O. Reg. 213/91
- Workplace Safety and Insurance Act



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

**13.19.1 PHYSICAL DEMANDS ANALYSIS**

<b>ESSENTIAL PHYSICAL REQUIREMENTS</b>		
Standing	Walking	Handling
Gripping	Carrying	Pinching
Fingering	Sitting	Pushing
Reaching Forward	Pulling	Handling
Reaching Overhead	Lifting	Pinching

<b>PHYSICAL / COGNITIVE / ENVIRONMENTAL DEMANDS</b>			
	<b>E</b>	<b>NE</b>	<b>COMMENTS</b>
Cervical	✓		Full flexion, extension and rotation required for all work duties
Lumbar	✓		Full flexion and extension required for all work duties
Shoulder	✓		Shoulder flexion/ abduction required to 170 degrees of range
Elbow	✓		Full range-of-motion required for filing and writing tasks
Wrist	✓		Full range of motion required for all tasks
Hip	✓		Required for all walking, sitting and standing tasks
Knee	✓		Required for all walking, sitting and standing tasks
Ankle	✓		Full flexion and extension required for all work duties

<b>SENSORY / PERCEPTION / COGNITION</b>			
	<b>E</b>	<b>NE</b>	<b>COMMENTS</b>
Vision	✓		Required for all tasks
Feeling	✓		Required for all tasks
Hearing	✓		Required for effective communication with co-workers and supervisors
Speech	✓		Required for effective communication with co-workers and supervisors
Reading	✓		Required for administrative work, performing inventory
Writing	✓		Required for administrative work, performing inventory
Concentration	✓		
Memory	✓		Required for all work processes



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

<b>WORK ENVIRONMENT</b>			
	<b>E</b>	<b>NE</b>	<b>COMMENTS</b>
Inside	✓		Some work performed indoors, dependent on project stage
Outside	✓		Most duties are outdoors
Extreme temp.	✓		Will encounter extreme temperatures seasonally
Noise		✓	Occasional noisy environment
Dust, vapour, fumes		✓	Will occasionally encounter dust
Slippery surfaces	✓		May encounter slippery surfaces
Hazardous machinery	✓		Hazards present from heavy operating equipment/ construction vehicles
Sharp tools		✓	Occasionally encounter sharp tools

<b>PERSONAL PROTECTIVE EQUIPMENT</b>			
	<b>E</b>	<b>NE</b>	<b>COMMENTS</b>
Head protection	✓		Mandatory on all job sites
Eye protection		✓	
Hearing protection		✓	
Hand protection		✓	
Foot protection	✓		Mandatory on all job sites
Respiratory protection		✓	

E: Essential demand

NE: Non-essential demand



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<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

### 13.19.2 MODIFIED WORK JOB TASKS

1. Light Cleanup
  - Using a broom and modified sweeping technique, clean floors and stairs.
  - Collect small pieces of garbage left around the site.
  - Sort and organize light equipment and materials throughout the site.
2. Safety Duties
  - Inspect safety equipment and devices for deficiencies (e.g., guardrails intact, floor openings secure, perimeter fence secure, etc.)
  - Fire extinguisher inspections
  - Temporary lighting inspections
3. Traffic Control/ Site Security
  - Back up spotter for construction or delivery vehicles on site.
  - Public vehicle or pedestrian traffic control using stop/slow sign.
  - Site security to ensure only authorized persons enter site or parking area.
4. Administrative Tasks
  - Inventory of tools, equipment, machinery, materials, chemicals, etc.
  - Work at head office – assist Project Managers, administration, etc.
5. Tool and Equipment Inspection and Cleaning
  - Perform safety and inventory check of all power tools and light equipment, checking for deficiencies or broken parts.
  - Clean hand tools or other equipment, where required.
6. Delivery Driver
  - Drive an automatic transmission vehicle to various locations around the job site to pick up or deliver equipment, fuel, site drawings, construction permits or other business documents.
  - Pick up or deliver items/ documents to and from head office.
  - Pick up and deliver any construction equipment or materials. Able-bodied workers to assist in loading and unloading heavy items.
7. Management Tasks (for Duncor management on modified duties)
  - Site staff may be accommodated by given a temporary position in the office, if required.
  - Assist Project Managers, estimators, etc.
  - Maintain safety documentation (supervisor inspections, orientations, etc.)



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

# ELEMENT 14: MANAGEMENT REVIEW & CHANGE MANAGEMENT

REVISION LOG				
YEAR.REV #	REVISED BY	DATE REVISED	APPROVED BY	DESCRIPTION OF CHANGES
2021.1	J. LASTNAME	MM.DD.YYYY	MR. PRESIDENT	<ul style="list-style-type: none"> <li>• X</li> <li>• Y</li> <li>• Z</li> </ul>
2022.1	KELCIE STEVENSON	01.2022	BRIAN DUNCAN	<ul style="list-style-type: none"> <li>• HSMS2022.1 SUPERSEDED BY HSMS2023.1</li> </ul>
2023.1	KELCIE STEVENSON	01.25.2023	BRIAN DUNCAN	Included: <ul style="list-style-type: none"> <li>• Roles and Responsibilities for all relevant workplace parties</li> <li>• Management Review Policy Statement</li> <li>• Management of Change Policy Statement</li> <li>• Input and output criteria for review meetings</li> <li>• Change management procedure</li> </ul> Withdrew: <ul style="list-style-type: none"> <li>• HSMS2022.1 procedure</li> </ul>
2024.1	KELCIE STEVENSON	01.24.2024	BRIAN DUNCAN	Modified: <ul style="list-style-type: none"> <li>• Change management procedure</li> </ul> Withdrew: <ul style="list-style-type: none"> <li>• HSMS2023.1 procedure</li> </ul>
2025.1	KELCIE STEVESNON	01.24.2025	BRIAN DUNCAN	Withdrew: <ul style="list-style-type: none"> <li>• HSMS2024.1 procedure</li> </ul>
2026.1	KELCIE STEVENSON	01.23.2026	BRIAN DUNCAN	Modified: <ul style="list-style-type: none"> <li>• 14.2 Procedure</li> <li>• 14.4 Procedure, #4 Documentation</li> </ul> Withdrew: <ul style="list-style-type: none"> <li>• HSMS2025.1 procedure</li> </ul>



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## 14.1 MANAGEMENT REVIEW POLICY STATEMENT

Duncor Senior Management is committed to implementing, promoting and maintaining a strong and effective health and safety management system. Duncor management will conduct a review of the health and safety management system to ensure continual improvement by evaluating the suitability, adequacy and effectiveness of the health and safety management program.

At minimum, Senior Management and Management will review the program on an annual basis. Where deficiencies or areas for improvement are found, a continual improvement plan will be created in order to correct the deficiencies and elevate the safety program.

Duncor management will set health and safety goals and targets in order to improve and maintain a proactive and successful health and safety program.

Continuous improvement plans, corrective actions, and company successes will be communicated to all employees. Management is committed to work together with all employees to ensure that the health and safety management system is beneficial, successful and integral to the success and well-being of all employees and of the Company.

All Duncor employees play a significant role within these processes and each have responsibilities they are required to uphold. We encourage participation and cooperation in achieving our objective of maintaining a safe and healthy work environment.

**Brian Duncan, Vice President**  
January 23, 2026



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
<b>REVIEWED</b>	01.23.2026
<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

## 14.2 MANAGEMENT REVIEW

### PURPOSE

The purpose of this procedure is to outline a time frame in which management is required to review documents and statistics and set continuous improvement goals for the company.

### SCOPE

This procedure applies to Duncor management.

### ROLES & RESPONSIBILITIES

#### Senior Management

- Ensure all documentation review and statistical analysis are performed by the end of the year.
- Ensure continuous improvement goals are set regarding the health and safety program for the following year.
- Ensure all OHS statistics, as outlined in Element 12, are reviewed and compared to the previous years to ensure improvement and identify goals for the continuous improvement plan.
- Ensure the review of all documentation and statistics is recorded and maintained on file.
- Ensure timely communication and training of the revised program, procedures and continuous improvement goals to all individuals of Duncor.
- Ensure monthly management review meetings are conducted with management and Health & Safety Coordinator(s) and health and safety items are reviewed and corrected in a timely manner.

#### Health & Safety Coordinator

- Provide Senior Management with the annual H&S Statistics Summary for the year. The H&S Statistics Report provides details addressing site documentation, site safety compliance, training and KPIs for management review.
- Assist / participate in the annual audit of all elements of the health and safety program and set continuous improvement goals for the following year.
- Assist management in the annual review of all applicable documentation and statistics.
- Create and implement action plans to ensure measurable objectives are being met.

#### Supervisors / Forepersons

- Assist management in the review of applicable documents, statistics, goals, etc. where required.
- Assist management in the implementation of continuous improvement goals.
- Ensure all Duncor workers, subcontractors and independent operators receive training on any new or revised policies and procedures.

#### Workers

- Report any accidents or incidents to management or Supervisors / Forepersons as soon as possible.
- Provide suggestions or report areas of concern to your certified member or your Supervisor / Foreperson.
- Attend all training sessions addressing any new or revised policies and procedures and ensure understanding or seek clarification where required.

#### Subcontractors / Service Providers

- Provide all required documentation to Duncor Supervisors / Forepersons as part of the HSMS.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
<b>APPROVED BY</b>	BRIAN DUNCAN, <i>VICE PRESIDENT</i>
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<b>SUPERSEDES</b>	HSMS2025.1

Visitors

- N/A

**PROCEDURE**

Management and the Health & Safety Coordinator shall review the following, but not limited to, documentation and statistics:

<b>Elements Under Review: Policies and Procedures</b>	<b>Timeline</b>
Element 1 – 14 Policy Statements	Annually
Health, Safety & Environment Program	Annually
Injury/ Incident Statistics	Annually
Document and Record Control System	Annually
Hazard Assessments & Control	Annually
Controls Policy Statement	Annually
Procurement & Contractor Management	Annually
Company Rules	Annually
Personal Protective Equipment	Annually
Preventative Maintenance	Annually
Training & Communication	Annually
Workplace Inspections	Annually
Investigations & Reporting	Annually
Emergency Preparedness	Annually
Statistics & Records	Annually
Legislation & Other Requirements	Annually
Management Review & Management of Change	Annually

<b>Elements Under Review: Programs</b>	<b>Timeline</b>
Cell Phone Usage	Annually
Company Vehicles	Annually
Confined Space	Annually
COVID-19 & Infection	Annually
Health & Safety	Annually
Return-To-Work	Annually

All elements identified must be reviewed for improvement in accordance with changes in legislation, codes, standards, and best practices. Deficiencies identified shall be outlined in a **Continuous Improvement Plan** for the following year in priority sequence.

The Health & Safety Coordinator will conduct a HSMS Audit, which will evaluate the Health and Safety Program according to legislation, codes, standards, and industry best practices.

The Health & Safety Coordinator will develop action plans as necessary to ensure measurable objectives, legislation and H&S policies requirements are being met. Senior Management and Health & Safety Coordinator are responsible for determining resources required and to adequately prepare workplace parties by allocating these resources to ensure completion. Action plans will be communicated to all employees / parties at least twice a year, once at the annual orientation and once again during a toolbox talk. These communications shall be documented as per Duncor’s Document & Record Control System.



<b>DOCUMENT</b>	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
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<b>EFFECTIVE ON</b>	01.27.2026
<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

In addition, the previous year's Continuous Improvement Plan shall be reviewed by management to ensure all goals have been successfully completed and implemented. All documentation and statistical information are to be reviewed by management no later than the end of the year. Key Performance Indicators (KPI) will be measured and analyzed to determine the overall OH&S performance and will include the following:

Fatalities	MOL Orders
Critical Injuries	MOE Orders
Lost Time Injuries (LTIs)	MOL Inspections
Violence & Harassment	Near Misses
Medical Aids	Vehicle Accidents
First Aids	Unreported Events
Property Damages	Untreated Injuries
Utility Strikes	Spills
Theft	Disciplinary Notices
Fire / Explosion	Work Refusals

Management review is intended to ensure continuous improvement by evaluating the suitability, adequacy, and effectiveness of the OH&S program. The annual frequency of these reviews ensures that OH&S items are captured in an acceptable manner of time to provide corrective measures that can be analyzed. The Health & Safety Coordinator prepares a report to be circulated prior to the meeting, which summarizes our organization's performance. Representation at the review includes senior management, health and safety representative and site management. These review meetings are to be held each year.

In addition to the Agenda and Minutes, the following information and data is presented during the management review:

<b>Review Input Criteria</b>
Evaluations of the effectiveness of all elements of the HSMS
Status of actions from previous management reviews
Results of Audits Includes internal and external audits, including COR Audits
Evaluations of compliance with legal requirements
Results of participation and consultation with employees / Health and Safety Representative / JHSC
Communication from external parties
Performance of the HSMS including statistics of work-related injuries and incidents
Extent to which Health and Safety objectives and target have been met
Status of incident investigations and trends identified
Status of actions taken and status implementation of corrective and preventative actions
Internal and external changes that are relevant to the quality of the HSMS
New developments in legal requirements or technology
Identified barriers to worker participation
Recommendations for improvement



<b>Review Output Criteria</b>
Approved changes to the Health and Safety Policy
Measurable objectives
Action plan to achieve objectives
Allocation of resources
Approved revisions to any elements of the HSMS, as appropriate
Removed barriers to worker participation in the HSMS
Time frame for change
Communication of outcomes, objectives and action plans to employees



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<b>VERSION #</b>	HSMS2026.1
<b>SUPERSEDES</b>	HSMS2025.1

Duncor Senior Management’s Review meeting will consist of these elements. We recognize the input and output criteria may change as a direct result of information, industry technology, legislative changes, etc. Our output criteria will reflect our strategic direction based on the input criteria which will be communicated to relevant workplace parties as required.

Each one of the above elements are pre-populated into the Annual Senior Management Review Meeting Minutes template. All required documentation will be supplemented and prepared for Senior Management’s review. During this meeting, Senior Management will review all existing / new documentation required for the HSMS and will approve or re-approve any changes, modifications, withdrawals and or new documentation. As part of this process, each management review input will be evaluated for applicability and priority. Inputs deemed not applicable for the review year will be recorded as such in the meeting minutes with justification. Inputs found to be of greater relevance or risk to the organization will be identified as priority items and will help guide corrective actions or improvement planning for the following year. This ensures the review remains focused and responsive to current organizational needs.

Prior to the final approval, the H&S Worker Representatives will review and approve any proposed amendments. Once approved, Senior Management will ensure all new, changed, modified, withdrawn, or introduced information is effectively integrated into the system and communicated at the Annual Corporate Orientation.

**TRAINING**

All Duncor employees are to receive training on new or revised policies and procedures.

**COMMUNICATION**

Changes to any documents including but not limited to policy statements, the health and safety program, safe work practices, safe job procedures, etc. are to be communicated in a timely manner to all individuals of Duncor, in written form.

**RECORDKEEPING**

All documents shall be maintained using Duncor’s Document & Record Control System as per Element 1.10 of this manual.

A record of all meetings, revisions and edits made to documentation or statistical reviews is to be maintained on file by Duncor for a minimum of three years.

**DOCUMENTATION REQUIRED**

- Annual Review Documentation Checklist
- Management Review Meeting Minutes

**EVALUATION**

This procedure will be evaluated by management on an annual basis and changes will be implemented as required.



DOCUMENT	HEALTH & SAFETY MANAGEMENT SYSTEM MANUAL
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VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

### 14.3 MANAGEMENT OF CHANGE POLICY STATEMENT

Duncor Senior Management is committed to implementing, promoting and maintaining a strong and effective health and safety management system. Duncor management will conduct a review of the health and safety management system to ensure continual improvement by evaluating the suitability, adequacy and effectiveness of the health and safety management program.

This section contains our Management of Change Procedure. Its purpose is to ensure that health and safety risks are assessed, and controls are implemented under changing circumstances, which include but are not limited to:

- Changes in legislation and other legal requirements
- Changes in work processes, control measures, equipment, organization and work location
- Introduction of new products, processes or services
- Introduction of new developments in health and safety knowledge or technology

Duncor believes there are two major components when demonstrating continuous improvement:

1. Analyzing all identified gaps within the HSMS and determined corrective and preventative actions to adequately rectify the deficiencies.
2. Ensuring all relevant workplace parties are trained in working alongside Duncor management to achieve its desired outcomes through change management.

Duncor Senior Management will ensure that all objectives and actions plans are effectively communicated to all workplace parties and is committed to continually measuring the effectiveness of such changes as outlined in the procedure.

All Duncor employees play a significant role within these processes and each have responsibilities they are required to uphold. We encourage participation and cooperation in achieving our objective of maintaining a safe and healthy work environment.

**Brian Duncan, Vice President**  
January 23, 2026



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## 14.4 MANAGEMENT OF CHANGE

### OVERVIEW

Management of change is a crucial aspect in managing health and safety risks because of the ever-changing nature of equipment, work process, work environments, and legal requirements. Changes have the potential to introduce new hazards. Therefore, risks must be assessed to determine whether additional or new control measures to be put in place.

### PURPOSE

The purpose of this procedure is to establish a standardized process when significant changes in work processes, control measure equipment, organization and work location are introduced into the workplace.

### SCOPE

This procedure applies to all Duncor employees.

### ROLES & RESPONSIBILITIES

#### Senior Management / Health & Safety Coordinator

- Schedule and hold Management Health and Safety review meeting to identify changes related to programs and policies.
- Record and distribute Meeting Minutes to appropriate workplace parties, as required.
- Ensure completion of new hazard assessments when changes to legislation, products, processes, services, equipment/machinery, new developments in OHS knowledge/technology or the work environment is introduced. Hazard assessments shall be reviewed at least annually, or as needed.
- Ensure specified and appropriate controls are implemented in a timely manner for hazards and/or risks identified from hazard assessments. Controls shall be reviewed at least annually, or as necessary.
- Develop/revise safe operating procedures where necessary.
- Revise current health and safety documentation and forms to reflect the changes to be implemented.
- Ensure Supervisors / Forepersons are trained in new implementations and are competent.

#### Supervisors / Forepersons

- Ensure completion of new hazard assessments when changes to legislation, process, equipment/machinery, or the work environment is introduced.
- Ensure communication of changes with all workers and other relevant workplace parties.
- Provide training to relevant workplace parties, as needed.
- Ensure controls are adequately implemented.
- Ensure workers have been trained in new legislation, if applicable, and new procedures/processes. Supervisors / Forepersons must ensure that workers understand the new information.
- Ensure implementation of changes by monitoring workers and providing guidance when required.

#### Workers

- Participate all training sessions regarding changes that may impact health and safety.
- Participate in training sessions regarding communication of new controls.
- Ensure all new concepts are understood and ask for further clarification when required.
- Comply with all new policies and procedures.
- Provide input and/or recommendations.



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REVIEWED	01.23.2026
EFFECTIVE ON	01.27.2026
VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

Subcontractors / Service Providers

- Ensure communication of changes with all workers and other relevant workplace parties.
- Ensure workers have been trained in new legislation, if applicable, and new procedures/processes. Supervisors / Forepersons must ensure that workers understand the new information.
- Ensure implementation of changes by monitoring workers and providing guidance when required.
- Where required, conduct new hazard assessments to ensure all changes are adequately assessed and analyzed.
- Participate in training sessions regarding changes that may impact the health and safety of the workplace.

Visitors

- N/A

**PROCEDURE**

When a change occurs within the OHSMS, Management of Change ensures that hazards are identified, assessed, and controlled. This occurs during the Annual Management Review, and on a change-by-change basis during Monthly Management Meetings. The Health and Safety Coordinator will schedule meetings to review and identify activities and any changes relating to the OHSMS as well as company related statistics, investigations, inspection reports and follow-ups, external communication from appropriate workplace parties. All required changes will be integrated into Duncor’s HSMS during the Annual Management Review unless legislative requirements require emergency review. Any changes will be documented in the Meeting Minutes by the Health and Safety Coordinator and communicated to appropriate workplace partes through toolbox talks, safety meetings, etc.

1. Change Recognition

Management of Change is required, but not limited to:

- Changes in legislation and other legal requirements
- Changes in work processes, control measures, equipment, organization, and work location
- Introduction of new products, processes, and services
- Introduction of new developments in health and safety knowledge or technology
- Any other change that will have a significant impact on Duncor’s OHSMS

2. Hazard & Risk Assessments

Monthly Management Meeting Minutes will document any new processes, equipment, material and will initiate a hazard assessment, if necessary. The Health and Safety Coordinator will create or revise hazard assessments and control measures for all required changes approved by Senior Management. Risk Assessments, safe work practices and safe job procedures will be updated, as often as required, to reflect any, and all variances. All changes shall be reviewed and approved by Senior Management.

- Changes in processes, equipment, etc., are often coupled with changes in work processes, therefore, potentially presenting new hazards. Duncor shall ensure new hazards are not overlooked.
- When new hazards are identified, new risk assessments must be conducted as per Duncor’s Hazard Assessment & Controls Procedure in Element 2.

3. Determination and Implementation of Controls

- Management / the Health & Safety Coordinator will use the Hierarchy of Controls, found in Duncor’s Control Procedure in Element 3, to identify to most appropriate control measure for each hazard.
- Once control measures have been determined, Management shall ensure implementation.

4. Documentation



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VERSION #	HSMS2026.1
SUPERSEDES	HSMS2025.1

- The Health and Safety Coordinator will document any changes in the Meeting Minutes. Revisions of the HSMS Manual will be made by the Health and Safety Coordinator in consultation with Senior Management.
- Changes in legal requirements (i.e. legislation, regulations, standards, guidelines) will be reviewed at the Annual Orientation and/or through the use of the Legislative Review Form.
- Management / the Health & Safety Coordinator shall generate new or revise existing Safe Work Practices and Safe Job Procedures to reflect any, and all changes.
- Documents relating to changes in legislation and other legal requirements shall be made available for worker review on the Health & Safety Information Board (i.e. digital platform, SafetyLoop).
- Operator’s Manuals/Manufacturer’s guidelines of new equipment being introduced on site shall be filed on site and be made readily available for reference.
- Documents pertaining to changes in equipment/machinery (e.g., recalls, new developments of technology, etc.) shall be communicated to workers in a timely manner and shall be posted on the Health & Safety Information Board (i.e. digital platform, SafetyLoop).
- Documents pertaining to significant changes in work processes, control measures, equipment, organization, and work location shall be communicated (i.e. toolbox talks) to workers in a timely manner and shall be posted to the Health & Safety Board (i.e. digital platform, SafetyLoop).

## TRAINING

All Duncor employees are to be made aware of revised / new hazard assessments and receive training on new or revised policies, procedures, and processes. Management will provide additional training to meet new requirements, if applicable. Training can be delivered through Toolbox Talks, review of the JHA / SWP / SJP and during orientation.

## COMMUNICATION

Supervisors / Forepersons shall ensure all Duncor employees and other affected workplace parties are made aware of new hazards, controls, and new or revised policies and procedures through daily hazard assessments, Toolbox Talks, orientations, and H&S meetings.

## RECORDKEEPING

All documents shall be kept and maintained as per Element 1.10, Duncor’s Document & Record Control System.

Information pertaining to equipment and machinery on site shall be readily available and visibly posted in a conspicuous location.

Topics discussed pertaining to management of change shall be documented in the Management Review meeting minutes.

## DOCUMENTATION REQUIRED

- Hazard & Risk Assessment Document(s)
- Critical Task Risk Assessment
- Annual Management Review Meeting Minutes
- Safe Work Practices
- Safe Job Procedures
- Toolbox Talks

## EVALUATION

This procedure will be evaluated by management on an annual basis and changes will be implemented as required.