

Corporate Health and Safety Policy Statement

Bena Fastenings Inc is committed to preventing and reducing the risk of injury or occupational illness to our employees and the accidental loss of any of its resources and physical assets.

In fulfilling this commitment to protect both workers and property, management will provide and maintain a safe and healthy work environment, in accordance with industry standards and in compliance with the Occupational Health and Safety Act (OHSA) and the Construction Projects regulation (O. Reg. 213/91). We will strive to eliminate any foreseeable hazards that may result in personal injury/illness or property damage and loss of production.

We recognize while Bena Fastenings Inc and supervisors are directly responsible for health and safety in the workplace, that health and safety culture is created and shared between all workplace parties. All employees are expected to help us create a positive safety culture and help to minimize accidents within our facilities and on our worksites. Safe work practices and job procedures will be clearly defined in the company's Health and Safety Manual for all employees to follow.

Accidents can be prevented through good management in combination with active employee involvement. Safety is the direct responsibility of all managers, supervisors, and outside contractors.

All management activities will comply with company safety requirements as they relate to planning, operation, and maintenance of facilities and equipment. All employees will perform their jobs properly in accordance with established procedures and safe work practices.

I trust that all of you will join me in a personal commitment to make safety a way of life.

Signature:



Marco Bellazzi

Date: Jan/01/2020

NOTE: The safety information in this policy does not take precedence over Occupational Health and Safety legislation. All employees should be familiar with the Occupational Health and Safety Act and Regulations for Construction Projects (i.e., current edition of the green book).

Health and Safety Responsibilities

Senior Management Responsibilities

1. 1. Provide a safe and healthy workplace and promote a positive safety culture.
1. 2. Establish and maintain a health and safety program.
1. 3. Ensure that all Supervisors including Senior Management have completed the MOL's "[Supervisor Health and Safety Awareness in 5 Steps](#)" online training course and any other specific training required by the *Occupational Health and Safety Act* (OHSA).
1. 4. Ensure that workers are properly and adequately trained. This includes completing the MOL's "[Worker Health and Safety Awareness in 4 Steps](#)" online training course and any other specific training required by the OHSA.
1. 5. Report accidents and injuries to authorities as required by law.
1. 6. Provide medical/first aid facilities.
1. 7. Provide workers with health and safety information, instruction, and supervision.
1. 8. Ensure that workers appoint a Health and Safety Representative (HSR) or Joint Health and Safety Committee (JHSC) member.
1. 9. Form a JHSC if required by law.
1. 10. Inspect projects and meet regularly with supervisors to monitor the safety program and take corrective action.
1. 11. Provide leadership, motivation, and resources necessary to make the program work and create a positive workplace safety culture.
1. 12. Ensure that operations comply with both the law and the safety program.
1. 13. Demonstrate personal and corporate commitment to accident prevention.
1. 14. Include accident prevention and safety performance when evaluating the overall work performance of employees, especially supervisors.

Superintendent Responsibilities

1. 1. Provide primary corporate responsibility for on-site accident prevention implementation.
1. 2. Ensure that protective equipment, safety materials, and first aid supplies are provided and maintained in good condition.
1. 3. Instruct forepersons in the work to be undertaken and the safety practices required by law and by the program and ensure that they are followed.
1. 4. Monitor the health and safety performance of subcontractors. If subcontractors are not working safely, action needs to be taken immediately.
1. 5. Report accidents and injuries to authorities/senior management as required by the program and the OHSA and regulations.
1. 6. Investigate accidents (with foreperson) and act to prevent recurrence.
1. 7. Monitor safety behaviour and performance of forepersons, crews, and subcontractors. Act immediately when unsafe behavior is observed.

Supervisor (Foreperson) Responsibilities

1. 1. Make sure that the company's health and safety program is carried out.
1. 2. Ensure that protective equipment required by law and by the health and safety program is used and maintained properly by workers and that workers understand the reasons for its use.
1. 3. Instruct personnel in proper work practices and update this instruction before work begins and when unsafe behavior is observed as needed.
1. 4. Take disciplinary action with limits of authority when workers are not working safely or wearing prescribed PPE.
1. 5. Inspect work areas and work practices for hazards and take corrective action where required.
1. 6. Consult with the Health and Safety Representative.

1. 7. Promote a workplace climate where workers can raise safety concerns and know that their concerns will be taken seriously.
1. 8. Ensure that injuries are treated and reported.
1. 9. Investigate and report all accidents and take corrective action to prevent a reoccurrence.
1. 10. Acquaint all workers with workplace hazards and safe work procedures (with a special focus on new workers).

Worker Responsibilities

1. 1. Work in accordance with the company health and safety program.
1. 2. Work in a manner that will not endanger anyone.
1. 3. Report unsafe situations.
1. 4. Comply with the OHSA and all relevant regulations.
1. 5. Report injury or illness immediately.
1. 6. Help new employees recognize job hazards and follow proper procedures.
1. 7. Participate in the JHSC if chosen as a workplace representative.

Subcontractor Responsibilities

1. 1. Adhere to the general contractor's/constructor's health and safety program requirements. Follow all their safety rules and procedures in addition to your own.
1. 2. Monitor site conditions in your work area and take corrective action when unsafe conditions arise or when unexpected hazards are encountered.
1. 3. Report lost-time injuries immediately to the constructor.
1. 4. Request assistance from the Site Supervisor in dealing with hazards created by another employer's workforce or situational hazards beyond your control.

Constructor Responsibilities

1. 1. Monitor subcontractors for compliance with the *Occupational Health and Safety Act and Regulations for Construction Projects* (i.e., the green book) and compliance with constructor health and safety rules and procedures.
1. 2. Ensure that subcontractors and their workers are obliged by contract to comply with the constructor's health and safety program.
1. 3. Monitor safety performance and take corrective action immediately when unsafe behavior is observed.

Health and Safety Representative Responsibilities

1. 1. Inspect the workplace.
1. 2. Identify situations that may be a source of danger or hazard to workers.
1. 3. Make recommendations to the employer.
1. 4. Investigate and help deal with work refusals.
1. 5. Assist in accident investigations.

Joint Health and Safety Committee Responsibilities

1. 1. Appoint a member of the committee to do the monthly inspection of the workplace.
1. 2. Review health and safety reports.
1. 3. Make recommendations to the employer.
1. 4. Assist in accident investigations.
1. 5. Identify situations that may be a source of danger.
1. 6. Assist in resolving work refusals and reports of "dangerous circumstances."

Worker Trades Committee Responsibilities

1. 1. Report health and safety problems to the JHSC.
1. 2. Assist in resolving disputes and problems in health and safety.

Certified Member of Joint Health and Safety Committee Responsibilities

The certified member has the same duties as the non-certified representative but with the additional right to initiate bilateral work stoppage. Certified members may also initiate a unilateral work stoppage where special permission has been granted by the Ontario Relations Board or the employer has adopted (in writing) section 47 of the OHS Act respecting work stoppages.

Safety Coordinator/Health and Safety Support Personnel Responsibilities

1. 1. Advise all employees on health and safety matters.
1. 2. Identify workers that require additional training and coordinate health and safety activities throughout the project/company.
1. 3. Collect and analyze health and safety statistics.
1. 4. Provide health and safety training and maintain a record of individual training for workers.
1. 5. Conduct research on emerging safety trends and special workplace problems.

All Employees Responsibilities

In addition to the responsibilities set out above, all employees must become familiar with the OHS Act, all applicable regulations, and the requirements of the company health and safety program. They must know exactly what their responsibilities are and have the required ability and training to fulfill them. They must also have sufficient authority to either carry them out personally or delegate them to someone with the required ability to carry them out.

NOTE: Health and safety is not something added to an employee's job, but an inherent, central part of that job—a full-time component of each person's responsibilities.

Health and Safety Policy

Training

Employee Training

Bena Fastenings Inc is responsible for ensuring that all employees and supervisors are adequately trained for the job tasks they may be performing and the possible hazards they may face. It is committed to providing enough time and resources to train all personnel to perform their duties in an efficient and safe manner.

Management is responsible for ensuring that records of all completed training courses are maintained. A review of all training should take place at regular management/supervisor meetings and meetings of the Joint Health and Safety Committee (JHSC) and must be completed at least annually.

Management Training

In addition to meeting Bena Fastenings Inc supervisory training requirements, operations management will be given the opportunity to attend advanced training in maintaining safety in the workplace.

Supervisor Training

All Warehouse/manufacturing supervision employees must attend the following safety competency courses:

- First aid and CPR
- Bena Fastening Inc health and safety program training
- Specialized tool and equipment instruction as required.

Worker Training/Instruction

Workers will be instructed by a competent person to ensure that safety is maintained in the workplace. Formal training must be provided for the following:

- Personal Protective Equipment (e.g., respirator training, hazmat training if required)
- WHMIS
- Tools and equipment (new or specialized)
- Emergency Response

An evaluation must be completed to ensure workers are familiar with program content and the activities for which they will be responsible.

Visitors

Any Bena Fastening Inc employee authorizing a site visit assumes responsibility that visitors have signed in, completed visitor questionnaire, been made aware of all safety requirements, and have in their possession all safety equipment required for the site.

Bena Fastenings Inc.

Health and Safety Policy

Health and Safety Training

Purpose

The purpose of this policy is to provide for consistent general and specialized health and safety-related training throughout all levels of the organization.

Policy

Bena Fastenings Inc will provide all health and safety-related training that is prescribed and necessary to minimize losses of human and physical resources of the company. All employees will participate in this training.

This training will include, but not be limited to:

- ♣ Safety orientation
- ♣ New hire safety orientations
- ♣ Safety training for workers, supervisors, and management
- ♣ Task and trade-specific training and certification
- ♣ Workplace Hazardous Materials Information System (WHMIS) training, annual update, and site-specific orientation
- ♣ MOL-approved Working at Heights training in addition to oral and written instructions on site-specific fall protection systems provided by a competent person
- ♣ Safe work practices and job procedures, as applicable
- ♣ The proper fitting, safe use, cleaning, and maintenance of respiratory protective equipment, as applicable.

In addition, safety meetings involving workers will be held on a weekly basis or as determined by site requirement.

NOTE: The safety information in this policy does not take precedence over occupational health and safety legislation. All employees should be familiar with the Occupational Health and Safety Act and Regulations for Construction Projects (i.e., the current edition of the green book).

Health and Safety Education/Training



Title:	Training Matrix	Date of Issue:	[date]
Approved by:	[name]	Review/Revise Date:	[date]
Location:	[location]		

	Define the Training Requirements	Timeframes for Training	
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Completion

Assigning Responsibility for Training Delivery	Evaluate the Training	Record of Training	
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Employee Orientation			
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Working at Heights Training			
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Promotion/Transfer Orientation			
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Initial Job Instruction			
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Employer Certifications			
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Health & Safety Inspections			
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Injury/Incident Investigations			
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