Master Builder & Construction Contractor

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empcontracting.ca Inc. General Safety Manual

Occupational Health & Safety Management System (SMS) — Policies, Responsibilities, Hazard Controls, Standard Safety Symbols, and Operational Forms aligned with the *Ontario Occupational Health and Safety Act* (**R.S.O. 1990, c. O.1**) and *Construction Projects Regulation* (**O. Reg. 213/91**).

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SMS EXECUTIVE OVERVIEW & ARCHITECTURE

This manual establishes the Safety Management System (SMS) for **empcontracting.ca Inc.** across all custom residential builds, modular/semi-fabricated structural installations, renovations, shop operations, and administrative offices. Every employee, supervisor, subcontractor, and site visitor must understand and uphold their duties under this program and Ontario law.

SMS Foundation (Policies & Governance)	SMS Operation Specifics (Field Execution)
• Corporate Health, Safety, Violence & Harassment Policies • Ontario OHSA & O. Reg. 213/91 Availability on Site • Standardized Forms, Permits & Record Retention • Supervisory & Management Leadership Training • Implementation Tracking & Corrective Action Registry	• Inventory of Critical Tasks & Site-Specific Hazards • Daily Task Hazard Assessments (THA) & Crew Briefings • Site-Specific Emergency Response Plans & Drills • Scheduled Worksite, Equipment & Vehicle Inspections • Worker Competency Evaluations & Certification Tracking

> **Access to Forms & Legislation:** Master copies of all empcontracting.ca Inc. safety forms, Safety Data Sheets (SDS), and current copies of the *Ontario Occupational Health and Safety Act* and *Construction Projects Regulation (O. Reg. 213/91)* are maintained in every Site Safety Binder, at our London Head Office (2189 Dundas Street Unit 72), and via our digital project portal.

Commitment: empcontracting.ca Inc. recognizes that our people are our greatest asset. Management is firmly committed to providing a safe, healthy, and respectful work environment for all employees, subcontractors, clients, and visitors across every project site and facility.

- Take every precaution reasonable in the circumstances to protect workers and prevent occupational injuries and illnesses through proactive hazard recognition, evaluation, and control.
- Maintain full compliance with the *Ontario Occupational Health and Safety Act* (**R.S.O. 1990, c. O.1**), *O. Reg. 213/91*, the Ontario Building Code (OBC), and National Building Code (NBC) site safety standards.
- Provide clear instruction, competent supervision, certified training, and CSA-approved personal protective equipment (PPE).
- Foster active worker participation through Joint Health and Safety Committees (JHSC), Health and Safety Representatives, weekly toolbox meetings, and open hazard reporting without fear of reprisal (**OHSA s. 50**).

Role	Core Health & Safety Responsibilities
Senior Management / Corporate Officers	Establish and fund the SMS; ensure corporate compliance under **OHSA s. 32**; review and sign off on serious incident investigations and statutory reports to the Ministry of Labour (MLITSD) and WSIB; lead annual SMS management reviews.
Health & Safety Coordinator	Maintain the SMS manual, Hazard Assessments, and Training Matrix; conduct site audits and SDS inspections; coordinate JHSC/H&S Representative reviews; manage WSIB claims and Early & Safe Return to Work plans; track monthly safety statistics.
Project Managers	Complete Project Hazard Assessments (PHA) and Site Start-Up Packages prior to mobilization; ensure subcontractor pre-qualification and Constructor compliance; conduct formal monthly site inspections; manage the site Corrective Action Registry.
Site Superintendents & Supervisors	Instruct and supervise workers in safe procedures (**OHSA s. 27**); review daily THAs; conduct daily informal and weekly formal site inspections; enforce PPE and safety rules; lead weekly toolbox talks; investigate hazards, near misses, and work refusals immediately.
All Workers	Work in compliance with the OHSA and company procedures (**OHSA s. 28**); wear and maintain required PPE; inspect tools and equipment before each use; complete daily THAs; report all hazards, near misses, and injuries immediately; exercise the right to refuse unsafe work.
Subcontractors & Visitors	Execute the Subcontractor Start-Up Safety Agreement; supply WSIB clearance, WHMIS records, and SDSs; comply with all site rules. Visitors must sign in, wear mandatory PPE, and remain escorted at all times.

ELEMENT 1: GENERAL POLICIES & ONTARIO LEGISLATION

Environmental Stewardship Policy Element 1.2

empcontracting.ca Inc. is committed to sustainable building practices and minimizing environmental impacts across all construction phases. Hazardous materials, fuels, sealers, paints, compressed gases, and construction waste must be handled, stored, and disposed of in compliance with Ontario environmental statutes, WHMIS/GHS regulations, and municipal bylaws. Any spill or environmental release must be contained immediately using site spill kits and reported to the Site Superintendent.

Fit for Duty (Alcohol, Cannabis & Impairment) Policy — Element 1.3

All empcontracting.ca Inc. jobsites, shops, and company vehicles are strictly safety-sensitive environments. Every worker must arrive fit for duty and remain free from impairment throughout their shift.

- **Prohibitions:** Possessing, consuming, distributing, or working under the influence or after-effects of alcohol, recreational cannabis, illegal drugs, or unprescribed medications on company premises, jobsites, or in company vehicles is strictly prohibited.
- **Prescribed Medications:** Workers taking prescription or over-the-counter medication that may impair alertness, balance, or coordination must notify their Supervisor or the Health & Safety Coordinator prior to starting work so confidential temporary accommodation can be arranged.
- **Support & Testing:** Workers who voluntarily disclose a substance dependency before an incident or rule breach will be supported with confidential accommodation and rehabilitation resources without discipline. Reasonable-cause, post-incident, and return-to-duty testing may be required in accordance with applicable law.

Distracted Driving Policy — Element 1.4

When operating any company-owned, leased, rented, or personal vehicle on empcontracting.ca Inc. business, drivers must comply fully with the *Ontario Highway Traffic Act*. Holding or using hand-held cell phones, texting, emailing, entering GPS coordinates while in motion, reading documents, or personal grooming while driving is prohibited. Calls may only be taken via a hands-free system or after pulling safely off the roadway and placing the vehicle in Park.

Workplace Harassment & Workplace Violence Policies (OHSA Part III.0.1) — Element 1.5 & 1.6

In compliance with **OHSA Sections 32.0.1 through 32.0.8**, empcontracting.ca Inc. enforces zero tolerance for workplace violence, workplace harassment, sexual harassment, and domestic violence entering the workplace.

- **Workplace Harassment:** Engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome, including workplace sexual harassment (as defined in **OHSA s. 1(1)**). Reasonable management direction, task assignment, and progressive discipline conducted in good faith do not constitute harassment.
- **Workplace Violence:** The exercise of physical force, an attempt to exercise physical force, or a statement or behaviour that it is reasonable for a worker to interpret as a threat to exercise physical force against a worker in a workplace. If a threat of violence is imminent, workers must move to safety and **call 9-1-1 immediately**.
- **Domestic Violence (OHSA s. 32.0.4):** If management becomes aware that domestic violence is likely to expose a worker to physical injury in the workplace, empcontracting.ca Inc. will take every precaution reasonable in the circumstances to protect the worker.
- **Complaint & Investigation Procedure:** Workers may report incidents verbally or in writing to their Supervisor, Project Manager, or directly to Senior Management / Health & Safety Coordinator (especially if the supervisor is the subject of the complaint). All complaints will be investigated promptly, fairly, and confidentially, with written results of the investigation and corrective actions communicated to the complainant and respondent.

Legislation Awareness & Right to Refuse Unsafe Work (OHSA Part V, s. 43) — Element 1.7

Every worker in Ontario has three fundamental statutory rights: the **Right to Know** about workplace hazards, the **Right to Participate** in health and safety decisions, and the **Right to Refuse Unsafe Work** (**OHSA s. 43**) without fear of reprisal (**OHSA s. 50**).

Stage	Ontario Statutory Work Refusal Procedure (OHSA s. 43)
Step 1: Report	The worker stops the unsafe task, remains in a safe place, and immediately reports the refusal and the reasons for it to their Site Supervisor or Employer.
Step 2: Stage 1 Investigation	The Supervisor/Employer immediately investigates in the presence of the refusing worker and a worker representative (a certified JHSC worker member, Health & Safety Representative, or a worker selected by peers). If resolved, the worker returns to work.
Step 3: Stage 2 & MLITSD Notice	If the worker still has reasonable grounds to believe the work is likely to endanger themselves or another worker, the Employer or worker must immediately notify an Inspector at the **Ontario Ministry of Labour, Immigration, Training and Skills Development (MLITSD Health & Safety Contact Centre: 1-877-202-0008)**.
Step 4: Pending Inspection	The refusing worker remains in a safe place at full pay (or may be assigned reasonable alternative work). No other worker may be assigned the refused work unless advised of the other worker's refusal and the reasons for it in the presence of the worker representative.

ELEMENT 2: HAZARD IDENTIFICATION, ASSESSMENT & CONTROL

All work tasks, equipment, and site conditions are systematically evaluated using the hierarchy of controls: **(1) Elimination/Substitution**, **(2) Engineering Controls** (guardrails, machine guards, ventilation), **(3) Administrative Controls** (Safe Work Procedures, permits, signage), and **(4) Personal Protective Equipment (PPE)**.

- **Project Hazard Assessment (PHA) & Site Start-Up:** Completed by the Project Manager and Site Superintendent prior to mobilization. Includes verifying utility locates (Ontario One Call), emergency hospital routing, muster points, Ministry of Labour Notice of Project (where required under **O. Reg. 213/91 s. 6**), and critical task risks.
- **Critical Task Inventory:** Maintained monthly for high-risk construction activities including working at heights, trenching/excavation, crane/hoisting operations, electrical work, confined spaces, silica/dust control, and heavy equipment operation.
- **Daily Task Hazard Assessment (THA):** Completed by workers and supervisors at the start of every shift, reviewed at mid-shift, and updated whenever tasks, crew members, or weather conditions change.
- **Hazard Reporting:** Any worker who identifies an unsafe act or condition must correct it immediately if safe to do so, or isolate the hazard and submit a Hazard / Near Miss Report to the Site Superintendent.

Personal Protective Equipment (PPE) & WHMIS/GHS Standards — Element 2.5 & 2.6

PPE / Hazard Category	Mandatory Site Standard (CSA / Ontario Regulatory Compliance)
Head Protection	CSA Z94.1 Type 1 or Type 2 hard hat worn at all times on active jobsites; inspect shell and suspension daily for cracks or UV damage.
Foot Protection	CSA Z195 Grade 1 protective footwear (Green Triangle patch) with puncture-resistant sole and ankle support required at all times on site.
Eye & Face Protection	CSA Z94.3 safety glasses with side shields required at all times on site; full face shields or sealed goggles required for grinding, cutting, chipping, or chemical handling.
High-Visibility Apparel	CSA Z96 Class 2 Level 2 (minimum) high-visibility vest or garment required at all times on site (Class 3 with retroreflective arm/leg bands for roadway/traffic control).
Fall Protection	Mandatory whenever a worker is exposed to a fall hazard of **3 metres (10 feet) or more**, or above operating machinery/hazardous substances (**O. Reg. 213/91 s. 26**). Workers must hold valid CPO-approved Working at Heights training and inspect CSA Z259 harnesses/lanyards before every use.
Hearing, Hand & Respiratory PPE	CSA hearing protection required where noise exceeds 85 dBA; task-specific cut/impact/chemical gloves; NIOSH-approved respirators with valid fit-test records for silica, fumes, or vapours.

PPE / Hazard Category	Mandatory Site Standard (CSA / Ontario Regulatory Compliance)
WHMIS 2015 / GHS	No hazardous product is permitted on site without a current supplier Safety Data Sheet (SDS) in the site SDS binder and compliant WHMIS supplier/workplace labels. All workers must hold current WHMIS training.

ELEMENT 3: EMERGENCY RESPONSE PREPAREDNESS

A site-specific **Emergency Response Plan (ERP)** is posted prominently at every empcontracting.ca Inc. jobsite and office prior to work starting. All workers are briefed on emergency routes, muster points, fire extinguisher locations, first aid stations, and alarm signals (air horn blasts: *1 long blast = Emergency / Stop Work; 3 short blasts = Evacuate Site to Muster Point*) during site orientation.

- **Personnel Emergency Information:** All workers are encouraged to complete a confidential Personnel Data Form listing emergency contacts, severe allergies, and medical conditions for emergency responders.
- **Drills & Inspections:** Emergency evacuation drills are conducted near project start-up and at least annually, documented on an Evacuation Record. Fire extinguishers are inspected monthly on site and certified annually by a licensed technician.
- **Media Protocol:** Workers must not speak to media or post photos/details of an emergency on social media; direct all inquiries to Senior Management.

Working Alone Policy Element 3.3

A worker is working alone when they are by themselves at a jobsite or facility where emergency assistance is not readily available if an injury or illness occurs. Working alone requires prior authorization from the Site Superintendent and Health & Safety Coordinator, a completed **Working Alone Record**, reliable two-way communication, and scheduled check-ins (minimum every 60 minutes, or more frequently for higher-risk tasks). If a check-in is missed, the designated supervisor must immediately attempt contact and dispatch assistance to the site.

ELEMENT 4: EMPLOYEE ONBOARDING, SAFETY RULES & STANDARD SYMBOLS

Every new hire, transferred worker, and subcontractor must complete a documented **Site Safety Orientation** before commencing work. Workers under 25 years of age or newly assigned to a task receive heightened supervision and verified competency evaluations before working independently. Mandatory baseline certifications include *Worker Health and Safety Awareness in 4 Steps* (**O. Reg. 297/13**), *WHMIS 2015*, and *Working at Heights* (for construction projects), plus task-specific equipment tickets (AWP/MEWP, telehandler/forklift, skid steer, hoisting/rigging, and Standard First Aid/CPR).

Standard Workplace Safety Rules & Hazard Symbols

The following mandatory, prohibition, and WHMIS 2015 / GHS hazard symbols govern all empcontracting.ca Inc. worksites. Violations are addressed through progressive coaching and enforcement (Step 1: Coaching → Step 2: Written Warning → Step 3: Suspension → Step 4: Termination / Site Removal; zero-tolerance offences result in immediate removal).

Symbol	Safety Category	Mandatory Rule / Hazard Meaning
	**Mandatory Site PPE**	CSA Hard Hat, CSA Safety Glasses with side shields, CSA Grade 1 Steel-Toe Boots, and CSA High-Visibility Vest must be worn at all times on site.
	**Zero-Tolerance Impairment**	Possession, sale, consumption, or working under the influence of alcohol, cannabis, or illegal drugs is strictly prohibited.
	**No Smoking / Vaping**	Smoking, e-cigarettes, and vaping are prohibited inside all buildings, trailers, and work zones except in clearly posted designated smoking areas.
	**No Personal Phones / Audio**	Personal cell phones are restricted to breaks unless authorized by the Superintendent for work duties. Headphones, earbuds, and personal audio players are prohibited on site.
	**Conduct & Security**	Weapons, fighting, horseplay, theft, vandalism, and tampering with fire, first-aid, or safety equipment are strictly prohibited.
	**WHMIS: Flame / Flammable**	Flammable gases, aerosols, liquids, and solids (fuels, solvents, adhesives). Keep away from heat, sparks, open flames, and hot work.
	**WHMIS: Corrosion**	Causes severe skin burns, permanent eye damage, or corrosion to metals (acids, concrete etchants, wet cement/mortar). Chemical gloves and splash goggles required.
	**WHMIS: Health Hazard**	May cause respiratory sensitization, carcinogenicity, or organ toxicity (crystalline silica dust, welding fumes, isocyanates). Engineering controls and fit-tested respirators mandatory.
	**WHMIS: Exclamation / Irritant**	Skin/eye irritation, narcotic drowsiness, or acute lower-level toxicity. Review SDS Section 8 for ventilation and PPE requirements before use.
	**WHMIS: Gas Under Pressure**	Compressed, liquefied, or dissolved gases (propane, acetylene, oxygen). Store upright, chained/secured, with valve caps installed when not in use.

ELEMENT 5: INSPECTIONS, PREVENTIVE MAINTENANCE & TAG-OUT

Routine inspections verify safe site conditions and equipment integrity. Deficiencies identified during any inspection are logged immediately into the Corrective Action Registry with an assigned owner and completion deadline.

Inspection / Equipment Type	Required Frequency	Responsible Personnel & Standard
Active Construction Worksite	Daily (Informal) & Weekly (Formal)	Site Superintendent & Worker Representative (plus monthly Project Manager inspection)
Head Office & Shop Facility	Monthly	Health & Safety Coordinator / JHSC Representative
Mobile Equipment (AWP, Forklift, Skid Steer)	Daily Pre-Use & 250-Hour Service	Certified Operator (pre-use log) & Qualified Mechanic (manufacturer service schedule)
Company Trucks & Trailers	Daily Walk-Around & Monthly Log	Assigned Driver; loads secured in accordance with Ontario Highway Traffic Act
Defective Equipment Lock-Out / Tag-Out	Immediate upon defect	Any worker discovering a damaged tool, cord, scaffold, or machine must affix a red **DO NOT OPERATE / REPAIR ORDER** tag, remove it from service, and notify the Supervisor.

ELEMENT 6: NEAR MISSES, INCIDENTS, FIRST AID & RETURN TO WORK

Every unsafe condition, near miss (close call), first aid case, medical aid injury, property damage event, or environmental incident must be reported immediately to the Site Superintendent and Health & Safety Coordinator. Investigating near misses prevents future severe injuries (the Incident Pyramid principle).

- **Scene Preservation:** Following an injury or critical incident, attend to injured persons first, eliminate immediate ongoing danger, and secure the scene untouched until the investigation (and MLITSD inspection, where applicable) is completed.
- **Ontario Ministry of Labour (MLITSD) Statutory Notices (OHSA s. 51–53):** If any person is killed or critically injured at a workplace, management must notify the MLITSD Inspector, the JHSC/H&S Representative, and the trade union immediately by telephone and submit a written report within **48 hours**. Prescribed construction site occurrences (structural/scaffold collapse, crane/hoist upset, explosion, fire, or uncontrolled release) must also be reported immediately under **OHSA s. 53**.
- **WSIB Reporting:** Any work-related injury or occupational disease requiring health care treatment beyond first aid, resulting in lost time beyond the day of injury, or requiring modified work at reduced wages must be reported to the **Workplace Safety and Insurance Board (WSIB)** within **3 business days** of learning of the obligation.

- **First Aid & Early and Safe Return to Work (Modified Work):** First aid stations meeting *O. Reg. 1101* are maintained on every site with certified First Aid Attendants identified on the site safety board. empcontracting.ca Inc. provides suitable, meaningful modified duties within medical restrictions to support safe recovery.

ELEMENTS 7–10: COMMUNICATIONS, CONSTRUCTOR DUTIES, ACTION TRACKING & REVIEW

- **Element 7 — Safety Communications & JHSC:** Supervisors hold weekly documented **Toolbox Talks** with all site workers and subcontractor representatives. Where 6–19 workers are regularly employed, a worker-selected **Health and Safety Representative** (**OHSA s. 8**) conducts monthly workplace inspections; where 20 or more workers are regularly employed (or on projects lasting 3+ months with 20+ workers), a certified **Joint Health and Safety Committee (JHSC)** (**OHSA s. 9**) operates with at least 50% worker members.
- **Element 8 — Constructor & Subcontractor Responsibilities (OHSA s. 23):** On projects where empcontracting.ca Inc. is the designated *Constructor*, we ensure that every employer, subcontractor, and worker on site complies with the OHSA and *O. Reg. 213/91*. All subcontractors must sign the **Subcontractor Start-Up Safety Agreement**, provide current WSIB Clearance Certificates, submit worker training credentials, and participate in site orientations and weekly toolbox meetings.
- **Element 9 — Corrective Action Registry:** Open corrective actions from inspections, toolbox meetings, near misses, and audits are consolidated into the site **Corrective Action Registry**, reviewed weekly, and retained for a minimum of **three (3) years**.
- **Element 10 — Annual Program Review:** Senior Management, the Health & Safety Coordinator, and worker representatives review incident/near-miss statistics (targeting a minimum 4:1 ratio of proactive near-miss reports to incidents), audit findings, and Ontario legislative updates annually to continually improve this manual.

STANDARD SMS FIELD FORMS (TEMPLATES)

FORM A: DAILY TASK HAZARD ASSESSMENT (THA) & FIT-FOR-DUTY SIGN-OFF

Project Name / # :	**Date:**	**Supervisor:**
Task Description:		**Muster Point:**
Mandatory PPE Checked: [ ] Hard Hat [ ] Safety Glasses [ ] CSA Grade 1 Boots [ ] Hi-Vis Vest **Specialized PPE:** [ ] Harness [ ] Respirator [ ] Hearing [ ] Gloves		
Key Site Hazards: [ ] Working at Heights [ ] Overhead Loads [ ] Trenching/Locates [ ] Power Tools [ ] Live Electrical [ ] Silica/Dust [ ] WHMIS [ ] Traffic/Mobile Equip. [ ] Weather/Slips		

Task Step	Identified Hazard	Control Measure to Eliminate / Reduce Risk
1.		
2.		
3.		

Worker Crew Sign-Off (Confirming Fit for Duty & Hazard Review):

1. Name: _____ Sign: _____ 2. Name: _____ Sign: _____

FORM B: MASTER CORRECTIVE ACTION REGISTRY & MANUAL REVISION LOG

Date / Source	Identified Deficiency / Manual Section Update	Assigned To	Due Date	Closed
				[ ]
				[ ]
				[ ]
				[ ]

LEGISLATIVE REFERENCES & CORPORATE VERIFICATION

1. Government of Ontario. *Occupational Health and Safety Act, R.S.O. 1990, c. O.1* (Parts I–X, including Duties of Constructors, Employers, Supervisors, Workers, Violence & Harassment, Right to Refuse Unsafe Work, and Notices). Available at: https://www.ontario.ca/laws/statute/90o01
2. Government of Ontario. *O. Reg. 213/91: Construction Projects* (under the Occupational Health and Safety Act, R.S.O. 1990, c. O.1).

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