FRECON

GROUP OF COMPANIES INC.

HEALTH & SAFETY MANUAL



FRECON CONSTRUCTION

SEPTEMBER 2026 • VERSION 2026.03

OVERVIEW

Frecon Group of Companies has established a comprehensive Health and Safety Manual to support a safe and healthy work environment for all employees, subcontractors, and visitors. This program outlines the policies, procedures, and safe work practices that govern how work is planned and performed across all operations.

This manual applies to all company activities and worksites. It is designed to ensure work is carried out in a safe, and consistent, and compliant manner. All employees are required to comply with the requirements outlined in this manual and use it as a guide for daily work activities, expectations, and safe work practices.

The requirements contained within this manual apply to all companies operating within the Frecon Group of Companies, including Frecon Construction Ltd., Frecon Labour Services Inc., and Frecon General Contractors Inc. Any and all other companies performing work on behalf of any Frecon Group company must comply with the requirements contained in this manual.

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POLICIES

Health & Safety Management System

FRECON
GROUP OF COMPANIES INC.

GENERAL CONTRACTORS • DESIGN BUILDERS • CONSTRUCTION MANAGERS

HEALTH AND SAFETY POLICY

Doc No:	FC-HSE-POL-001	**Revision Date:**	February 1st, 2026
Revision No:	1	**Approved by:**	Douglas Drevniok

Senior Management of Frecon is vitally interested in the health and safety of its employees. The protection of employees from injury and illness is a major continuing objective.

All employees must be dedicated to the continuing objective of reducing risk of injury and illness. Frecon, as an employer, is responsible for an employee's safety. As president of Frecon, I give you my personal promise that every reasonable precaution will be taken for the protection of employees and prevention of injuries and illness. Senior Management is committed to ensure that all work carried out is planned and performed in the safest manner reasonably possible and in compliance with applicable Occupational Health and Safety (OHS) legislation and other requirements.

We recognize that all workplace parties have safety responsibilities on site, including but not limited to, the employer, subcontractors, supervisors, workers, suppliers, and visitors. For detailed roles and responsibilities consult FC-HSE-STN-001.

Every employee must protect their own safety by working in compliance with the law and with safe work practices and safe job procedures established by the company. Frecon recognizes the right of workers to work in a safe, healthy work environment and any employees that consider work to be unsafe are to stop work and promptly notify management.

Senior Management is also committed to continual improvement within the organization and as such, sets and reviews OH&S objectives, reviews the OH&S Program at a minimum annually and measures OH&S performance.

We are also committed to working in a spirit of consultation and co-operation with workers through channels such as our Joint Health and Safety Committee, safety meetings and employee feedback on our Health and Safety Program.

It is in the best interest of all parties to consider safety in every activity. Commitment to safety must form an integral part of this organization, from the president to the employees. We encourage all parties to cooperate in our Safety Program.



February 1st, 2026

_____ Date: _____

Douglas Drevniok, President

GENERAL CONTRACTORS • DESIGN BUILDERS • CONSTRUCTION MANAGERS

VIOLENCE AND HARASSMENT POLICY

Doc No:	FC-HSE-POL-002	**Revision Date:**	February 1st, 2026
Revision No:	1	**Approved by:**	Douglas Drevniok

Frecon is committed to a safe, respectful environment free from violence and harassment. This policy applies to all workers, contractors, and visitors.

As defined in OHSA, Section 1, Workplace Violence is the exercise, attempt, or threat of physical force against a worker in a workplace that causes or could cause physical injury; Workplace Harassment means engaging in a course of vexatious comment or conduct against a worker that is known or ought reasonably to be known to be unwelcome. This includes Workplace Sexual Harassment.

All employees, including supervisors and temporary employees, should be treated with courtesy and respect at all times. Employees are expected to refrain from fighting, "horseplay," or other conduct that may be dangerous to others. Firearms, weapons, and other dangerous or hazardous devices or substances are prohibited from the premises of Frecon without proper authorization.

Conduct that threatens, intimidates, or coerces another employee, a client, or a member of the public at any time, including off-duty periods, will not be tolerated. Incidents of violent or harassing behavior need to be reported in a timely manner. All allegations are investigated promptly and discreetly.

This program will be reviewed as often as necessary to continue to protect workers from workplace violence and harassment.

February 1st, 2026

_____ Date: _____

Douglas Drevniok, President

GENERAL CONTRACTORS • DESIGN BUILDERS • CONSTRUCTION MANAGERS

HAZARD ASSESSMENT, ANALYSIS AND CONTROL POLICY

Doc No:	FC-HSE-POL-003	**Revision Date:**	February 1st, 2026
Revision No:	1	**Approved by:**	Douglas Drevniok

At Frecon, hazard and risk management are fundamental elements to ensure that our work activities are carried out safely. Senior Management is committed to providing a safe workplace for all personnel.

We develop hazard assessments in which an exhaustive list of hazards, risk and controls are documented for work activities which could include routine or non-routine tasks. Our crew also performs Site Specific Hazard Assessments which enables our personnel to identify specific hazards in their work environment and identify the required controls.

We also ensure to review relevant Legislation, standards, guidelines and manufacturer's recommendations when developing our hazard assessments. Everyone in the workplace has a responsibility to identify hazards that may be potential or actual and participate in identifying control measures.

Our Hazard Assessment, Analysis and Control Procedure (FC-HSE-PRO-003) describes in further detail our risk rating methodology, our critical tasks, the hierarchy of controls used, and how hazards are identified and assessed at the company.

Overall, we view our hazard assessment and analysis program as an important element in implementing and improving our Occupational Health and Safety Management System. Senior Management is committed to providing the necessary resources, budget, and time to ensure hazards are adequately identified and assessed across the organization.

_____ Date: February 1st, 2026

Douglas Drevniok, President

GENERAL CONTRACTORS • DESIGN BUILDERS • CONSTRUCTION MANAGERS

CONTROLS POLICY

Doc No:	FC-HSE-POL-004	**Revision Date:**	February 1st, 2026
Revision No:	1	**Approved by:**	Douglas Drevniok

We are committed to providing a safe workplace for all our employees, subcontractors, visitors and members of the public. We strive to control hazards by eliminating or substituting the hazard when possible. When elimination or substitution is not possible, we apply the hierarchy of controls and put in place engineering, administrative and PPE controls.

Everyone involved with the work activities must adhere to the required controls. Everyone has a part to play in controlling hazards in the work environment, this includes reporting actual or potential hazards to ensure the necessary controls are put in place.

We review our Control Programs regularly to ensure the controls are effective.

Overall, we view our Control Program as an important element in implementing and improving our Occupational Health and Safety Management System. Senior Management is committed to providing the necessary resources, budget and time to ensure controls are adequately identified and implemented across the organization.



February 1st, 2026

_____ Date: _____

Douglas Drevniok, President

GENERAL CONTRACTORS • DESIGN BUILDERS • CONSTRUCTION MANAGERS

PROCUREMENT AND SUBCONTRACT MANAGEMENT POLICY

Doc No:	FC-HSE-POL-005	**Revision Date:**	February 1st, 2026
Revision No:	1	**Approved by:**	Douglas Drevniok

Frecon recognizes that contractors may be exposed to or create new hazards in our work environment. We have put a Procurement and Sub-Contractor Management Program in place to ensure these hazards are identified and adequately controlled.

It is important to us that all contractors undergo a Pre-Qualification process as per our Procurement and Contractor Management Procedure. This Policy has been put in place to ensure the safety of our workers, sub-contractors, members of the public, clients and other interested parties.

This Policy applies when Frecon is performing work on a project or when we hire a sub-contractor to perform work.

We are committed to ensuring that only qualified sub-contractors perform work on our sites who meet at a minimum, Legislated requirements and the company's Health and Safety Program requirements.

Furthermore, we have a process in place to evaluate the health and safety performance of all contractors. This process is in place to verify that requirements are being met and identify areas for improvement.

Overall, we view our Contractors and Sub-Contractor Program as an important component in implementing and improving our Occupational Health and Safety Management System. Senior Management is committed to providing the necessary support and resources to ensure this program is effectively implemented and maintained throughout the organization.



February 1st, 2026

_____ Date: _____

Douglas Drevniok, President

GENERAL CONTRACTORS • DESIGN BUILDERS • CONSTRUCTION MANAGERS

COMPANY RULES POLICY

Doc No:	FC-HSE-POL-006	**Revision Date:**	February 1st, 2026
Revision No:	1	**Approved by:**	Douglas Drevniok

At Frecon, we are committed to providing a safe work environment for all our employees, visitors, sub-contractors and members of the public. We have developed a list of general health and safety rules applicable for all our projects to ensure the safety of all personnel. Clearly defining our company rules assists us with implementation and improvement of our Occupational Health and Safety Management System.

Our disciplinary policy promotes fair and constructive treatment of unacceptable work performance. The progressive discipline process will, where appropriate, be carried out with the intent of improving employee behaviour and performance. All personnel must comply with the Company Rules set forth by the company. Failure to comply with the Company Rules will result in disciplinary action as outlined in our Progressive Disciplinary Procedures.

Employees are encouraged to report any non-compliance with the company's health and safety rules to their direct Supervisor, the Health and Safety Team or a member of Senior Management.

Overall, we are committed to providing the necessary support and resources to ensure that the Company Rules are properly established, implemented, and consistently enforced throughout the organization.



February 1st, 2026

_____ Date: _____

Douglas Drevniok, President

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PERSONAL PROTECTIVE EQUIPMENT POLICY

Doc No:	FC-HSE-POL-007	**Revision Date:**	February 1st, 2026
Revision No:	1	**Approved by:**	Douglas Drevniok

Frecon is committed to ensuring a safe work environment for all employees, sub-contractors and visitors. Personal Protective Equipment (PPE) is used as a last line of defense if alternative controls are not suitable in controlling a hazard in the working environment.

Specialized PPE will be available from the company and maintained according to manufacturers or regulatory requirements.

Specific PPE requirements for specific tasks and jobs are documented in safe job procedures, safe work practices, and hazard assessments. Mandatory PPE requirements are communicated during orientation.

Employees, site visitors and subcontractors are required to comply will all PPE requirements. Failure to comply with the company's PPE Policies and Procedures will result in disciplinary action.

Our Personal Protective Equipment Procedures outline all PPE used in our workplace, the standards that must be met, inspection and maintenance requirements, and criteria for selection and purchase.

Furthermore, any workers required to wear specialized PPE receive training or instruction on how to use, inspect, care, proper fit and maintenance of the PPE they are provided with.



February 1st, 2026

_____ Date: _____

Douglas Drevniok, President

GENERAL CONTRACTORS • DESIGN BUILDERS • CONSTRUCTION MANAGERS

PREVENTATIVE MAINTENANCE POLICY

Doc No:	FC-HSE-POL-008	**Revision Date:**	February 1st, 2026
Revision No:	1	**Approved by:**	Douglas Drevniok

The Senior Management team is committed to providing a safe work environment for all employees, visitors, contractors, and members of the public. To support this commitment, we ensure that all equipment, vehicles, tools, machinery, and facilities are properly maintained to protect the safety of all personnel.

Our Maintenance Program establishes the requirements for maintaining equipment, tools, machinery, vehicles, and facilities. It includes:

1. Maintaining an up-to-date inventory list
2. Developing schedules to track and monitor maintenance activities
3. Keeping maintenance records on file
4. Ensuring Operator's Manuals are readily available and reviewed to determine maintenance requirements

The Maintenance Program is based on legislated requirements and manufacturer recommendations.



February 1st, 2026

_____ Date: _____

Douglas Drevniok, President

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TRAINING POLICY

Doc No:	FC-HSE-POL-009	**Revision Date:**	February 1st, 2026
Revision No:	1	**Approved by:**	Douglas Drevniok

Frecon understands that a strong Occupational Health and Safety Training Program is essential so that all employees, contractors, and visitors know their safety roles and responsibilities

We are committed to providing employees with the training necessary to perform their duties safely. Training will be maintained, and refresher sessions provided as outlined in the Training Procedure.

Training needs are identified based on the hazards, risks, legislation, and tasks associated with each job. The Training Procedure describes how employees are trained, how training is tracked, how training needs are determined, and how the program is managed.

No employee is to perform work for which they have not received the required training. Employees are expected to attend all required training sessions and apply the knowledge gained in their daily work.

Sub-contractors and visitors on company project sites must also provide proof of required training before commencing work.

Violations of the company's Training Policy and Procedure will be addressed through the company's progressive disciplinary program.



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Douglas Drevniok, President

February 1st, 2026

Date: _____

COMMUNICATIONS POLICY

Doc No:	FC-HSE-POL-010	**Revision Date:**	February 1st, 2026
Revision No:	1	**Approved by:**	Douglas Drevniok

At Frecon, we understand that effective communication is essential to ensure that all employees, contractors, and visitors understand their roles and responsibilities regarding workplace safety. Clear communication also helps everyone stay up to date with our Occupational Health and Safety Management System and respond efficiently to any changes or issues.

We are committed to providing the resources necessary to ensure that health and safety information is effectively communicated and understood at all levels of the organization.

Our Communication Procedure provides further detail on how health and safety information is shared within the organization. Examples of communication include annual safety meetings, pre-job start-up reviews, toolbox talks, and Joint Health and Safety Committee (JHSC) meetings.

We value input from all personnel and actively encourage feedback to continuously improve our safety program.



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Date: February 1st, 2026

Douglas Drevniok, President

INSPECTION POLICY

Doc No:	FC-HSE-POL-011	**Revision Date:**	February 1st, 2026
Revision No:	1	**Approved by:**	Douglas Drevniok

At Frecon, we believe that inspections are a vital part of our Occupational Health and Safety Management System, as they help prevent injuries and illnesses in the workplace. Senior Management is committed to ensuring that inspections are conducted, properly recorded, and that any required actions are tracked to completion.

Inspections of workplaces, equipment, machinery, tools, and vehicles help identify hazards and document actions needed to control them. Employees receive training, as outlined in our Training Policy, on how to perform inspections effectively.

All workplace parties have roles and responsibilities in the inspection process. We believe that involving multiple levels of personnel allow us to better identify hazards and recommend appropriate controls. Our Inspection Procedure details inspection frequencies, elements to be inspected, and responsibilities of personnel.

Inspections also contribute to the continuous improvement of our OHSMS by:

1. Listening to concerns and receiving feedback from employees, contractors, and visitors
2. Gaining a better understanding of jobs and tasks
3. Identifying existing and potential hazards
4. Determining the underlying causes of hazards
5. Recommending corrective actions
6. Monitoring and tracking corrective actions to eliminate hazards or control risks



_____ Date: February 1st, 2026

Douglas Drevniok, President

GENERAL CONTRACTORS • DESIGN BUILDERS • CONSTRUCTION MANAGERS

INCIDENT REPORTING POLICY

Doc No:	FC-HSE-POL-012	**Revision Date:**	February 1st, 2026
Revision No:	1	**Approved by:**	Douglas Drevniok

Frecon is committed to maintaining a safe work environment for all personnel. In the event of an incident, it must be reported immediately to the appropriate personnel, as outlined in our Incident Reporting and Investigation Procedure. This procedure explains reporting requirements and guides investigations to identify root causes and corrective and preventive actions. Recommendations are then made following each investigation.

At Frecon, we strive for a zero-injury workplace and encourage all personnel to participate in inspections, identify hazards, and report near misses and minor first-aid incidents. Employees, contractors, and visitors are required to notify their supervisor immediately of any incidents as defined in the Incident Reporting and Investigation Procedure. Failure to do so may result in disciplinary action.

Our Incident Reporting and Investigation Procedure provides further details on which incidents must be reported internally and externally in compliance with legislative requirements, as well as how investigations are conducted.

February 1st, 2026

_____ Date: _____

Douglas Drevniok, President

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EMERGENCY PREPAREDNESS AND RESPONSE POLICY

Doc No:	FC-HSE-POL-013	**Revision Date:**	February 1st, 2026
Revision No:	1	**Approved by:**	Douglas Drevniok

Frecon is committed to ensuring that potential emergency situations are identified, and response plans are developed accordingly. We believe that being prepared, having the necessary resources and emergency response equipment will enable us to be able to prevent and mitigate the impact of an emergency.

Our emergency response procedure provides more detail on how our emergency response program is set up. This includes information on emergency response drills, communication methods and training. Our hazard assessments have identified a number of potential emergency situations, and our emergency response plans have been developed based on those hazards.

We are committed to ensuring the safety of our personnel, members of the public and any other visitors or contractors on site. Our program also details how we gather input into our emergency response plans and communications that may be required following an event.



February 1st, 2026

_____ Date: _____

Douglas Drevniok, President

STATISTICS AND RECORDS POLICY

Doc No:	FC-HSE-POL-014	**Revision Date:**	February 1st, 2026
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At Frecon, we are committed to maintaining a comprehensive Statistics and Records Program to support our Occupational Health and Safety Management System (OHSMS). This program ensures that all relevant health and safety data and records are consistently collected, maintained, and analyzed.

Frecon will conduct regular trend analyses using collected data to monitor the effectiveness of our OHSMS. These analyses will be used to identify hazards, evaluate performance, support continual improvement, and establish annual health and safety goals and objectives.

Our Statistics and Records Procedure outlines the specific indicators to be monitored, the frequency of review, and the methods used for analysis.

The results of all trend analyses will be documented and communicated to employees and management to promote awareness, accountability, and active participation in ongoing safety improvement initiatives.



February 1st, 2026

_____ Date: _____

Douglas Drevniok, President

LEGISLATION POLICY

Doc No:	FC-HSE-POL-015	**Revision Date:**	February 1st, 2026
Revision No:	1	**Approved by:**	Douglas Drevniok

At Frecon, we are committed to ensuring that all work activities are conducted in compliance with applicable occupational health and safety legislation and regulatory requirements.

Frecon will identify, maintain, and regularly review a list of applicable legislation relevant to our operations. In addition, we will reference recognized standards and best practices, including CSA standards, manufacturer recommendations, Safety Data Sheets (SDS), and applicable manuals, to support safe work practices across all job sites.

We recognize that compliance with legal requirements, combined with the implementation of industry best practices, strengthens our safety culture and helps protect the health and safety of all employees, contractors, and visitors.

Our Legislation Procedure outlines the process for identifying, evaluating, and maintaining compliance with legislative requirements, including the management of required postings and updates.



February 1st, 2026

_____ Date: _____

Douglas Drevniok, President

GENERAL CONTRACTORS • DESIGN BUILDERS • CONSTRUCTION MANAGERS

MANAGEMENT REVIEW POLICY

Doc No:	FC-HSE-POL-016	**Revision Date:**	February 1st, 2026
Revision No:	1	**Approved by:**	Douglas Drevniok

Frecon has developed and implemented an Occupational Health and Safety Management System (OHSMS) to evaluate the suitability, adequacy, and effectiveness of our safety program. We are committed to continuous improvement to help keep everyone safe in our workplace.

As part of this commitment, Senior Management conducts a Management Review at least annually. This review helps identify areas for improvement, highlight any program weaknesses, and guide ongoing enhancements to our safety program, ensuring continued progress and success in the years ahead.

Our Management Review Procedure outlines how reviews are conducted, the frequency of meetings, and the required inputs and outputs. Objectives are established based on the Management Review to support continuous improvement of the OHSMS.

Following each review, an action plan is created to ensure that opportunities for improvement or corrective actions are tracked and completed.

The Management Review also serves as a key tool for measuring health and safety performance and evaluating the effectiveness, suitability, and adequacy of our OHSMS.

_____ Date: February 1st, 2026

Douglas Drevniok, President

GENERAL CONTRACTORS • DESIGN BUILDERS • CONSTRUCTION MANAGERS

MANAGEMENT OF CHANGE POLICY

Doc No:	FC-HSE-POL-017	**Revision Date:**	February 1st, 2026
Revision No:	1	**Approved by:**	Douglas Drevniok

At Frecon, we are committed to ensuring that any changes that we make at the company are reviewed and controlled as part of our management of change procedure. We recognize that introducing changes into our work environment can create certain hazard and risks and we strive to control these as part of our management of change procedure.

All requested changes must go through our management of change process to ensure that we implement the required actions before implementing the change. This includes but is not limited to, ensuring that hazard and risk assessments are reviewed, that control programs are amended, if required, and that the changes are communicated along with any training provided to relevant workplace parties.

We believe that a management of change program can help reduce the risk of injury and illness. All changes are logged on our Management of Change Control Forms and tracked to completion.



February 1st, 2026

_____ Date: _____

Douglas Drevniok, President

PROCEDURES

Health & Safety Management System

DOCUMENT CONTROL AND RECORD RETENTION PROCEDURE

PURPOSE

The purpose of this procedure is to define how Frecon controls, approves, stores, updates, and retains documents and records associated with the Occupational Health and Safety Management System (OHSMS).

ROLES AND RESPONSIBILITY

Senior Management is responsible for:

1. Ensuring Frecon maintains a safe and secure network for the storage of digital documentation and records.
2. Reviewing this procedure annually during the management review meeting.
3. Ensuring access to documents and records is limited to only those who require access.
4. Providing locked filing cabinets for secure hard copy document and record storage.
5. Providing a secured server for digital document and record storage.
6. Approving revisions to existing documentation and approving new documentation required for the OHSMS.

HSE Department is responsible for:

1. Maintaining the Document Control Register.
2. Controlling revision history and issuing new document control numbers.
3. Storing records pertaining to the OHSMS in accordance with this procedure.
4. Communicating document revisions and ensuring obsolete documents are removed from circulation.
5. Providing printed materials to supervisors and/or ensuring digital documentation is readily available.

Supervisors are responsible for:

1. Removing any obsolete documents from circulation at the site level.
2. Ensuring new forms, procedures, and documentation are implemented on site.
3. Reporting any missing documentation to the HSE Department.
4. Ensuring workers have OHSMS documentation readily available on site, including posted materials.

Workers are responsible for:

1. Completing documentation as required and returning records to their supervisor.
2. Reporting any missing or outdated documentation.

Subcontractors are responsible for:

1. Completing all documentation required under the Frecon contract.

DOCUMENT OVERVIEW

The following documents and records are required to support the effectiveness of the Occupational Health and Safety Management System (OHSMS). This list has been established by Senior Management through the review of applicable legislation, manufacturer manuals, and relevant standards.

Client requirements are also reviewed prior to project start-up to determine whether additional documents or records are required.

Where legislation, standards, or other applicable requirements change, these changes are reviewed through the Management of Change process, and this list is updated accordingly.

Detailed Steps:

Step 1 Senior Management and the HSE Department review the applicable legislation, standards, client contractual requirements and manufacturer manuals. This is to identify if any additional documents or records will need to be developed or maintained to support the OHSMS.

Step 2 Review the documentation list below to determine if any additional documents need to be developed to support the OHSMS.

Step 3 If additional documents are required (such as a new safe work procedure, forms, policies, procedures, standards) assign a responsible person to develop the document. Note: Management of Change Form will be completed as part of Element 14.2 to document any changes to the OHSMS.

Step 4 The HSE Department is to update the list below if any additional documents or records are required to support the OHSMS.

Step 5 The HSE Department will ensure that the management of change process is implemented.

DOCUMENTATION

Internal Documents

Policies
Manuals
Safe Job Procedures
Safe Work Practices
Hazard and Risk Assessments
Forms
Frecon Standards

External Documents

CSA Standards
COR Audit Program Guidelines, Standard, and Audit Tool
Legislation
Legislated Posters (WSIB Form 82, Prevention Starts Here)
Maintenance and Operator Manuals
Safety Data Sheets

RECORDS

Workplace Safety Records

Field Level Hazard Assessments
Project Hazard Assessments – Site Specific Safety Plans
Toolbox Talks
Workplace Inspections
Safety meeting minutes (e.g., annual safety day, internal project meetings)

Equipment and Maintenance Records

PPE inspection records (internal and external)
Preventative Maintenance servicing records
Equipment, vehicle, or tool inspections (internal and external)
Emergency response equipment inspection

Employee and HR Records

Training records (internal and external)
Disciplinary records
WSIB claims
Return to work – modified work letters, progress reports, functional abilities forms
Employee health screening records

Regulatory / Third-Party Records

Third party inspections or investigations (e.g., Ministry of Labour, Ministry of Environment)
Statistical reports issued by WSIB
Completed permits (e.g., hot work, confined space entry)
Critical lift plans
JHSC meeting minutes
Notice of Project or Form 1000
Subcontractor pre-qualification packages and evaluation forms

DOCUMENT MANAGEMENT

This section outlines the processes and responsibilities for creating, approving, reviewing, updating, and controlling all documentation related to the Occupational Health and Safety Management System (OHSMS). It ensures that all documents are accurate, up-to-date, and readily accessible to authorized personnel.

Document Approval

All corporate-level documents relating to the OHSMS, including policies, procedures, and forms, are developed and reviewed by Frecon. The document approval process is as follows:

1. Corporate-level documents are drafted by the HSE Department with input from relevant stakeholders, which may include supervisors, workers, Human Resources, and technical experts.
2. Once drafted, the document is submitted by the HSE Department to the President for review and approval.

3. For existing documents, the HSE Department records and coordinates required changes and involves relevant stakeholders in the review process.
4. All amendments are documented in the revision history table within the document.
5. Changes are communicated to the President through management review meetings, e-mail, phone, or in-person meetings, as appropriate.
6. If no further changes are required, the President approves the document.
7. Following approval, the document is assigned a document number and added to the Document Control Register by the HSE Department.

Reviewing and Updating Documentation

All HSE Policies, Procedures, and Safe Work Procedures are reviewed on an annual basis. The review process is as follows:

Step 1 Corporate-level documents are reviewed during one of the following:

1. Management review meetings.
2. Annual Safety Day.
3. Other organized safety or project meetings.

Step 2 After review, corporate-level documents are submitted to the President for re-approval.

Step 3 Project-specific procedures may be reviewed and approved by the HSE Department and the Project Manager for the applicable project.

Step 4 If any documents are to be withdrawn from the OHSMS:

1. The President must approve the withdrawal.
2. The withdrawal is documented in the management review meeting minutes or in the Document Control Register.

Step 5 For online forms in the Corfix Application:

1. The HSE Department makes any required edits.
2. Changes are reviewed with the President prior to launching updates in the application.

Revision History and Tracking

All documentation pertaining to the OHSMS is tracked using the Document Control Register. The process is as follows:

1. The Document Control Register records:
   a) Unique document number
   b) Document name
   c) Revision number
2. Forms are created, maintained, and completed within Corfix. Any revisions to forms are recorded in the Document Control Register, with the updated version replacing the previous version in Corfix to ensure only the current approved form is available for use.
3. Policies, procedures, safe work practices, and other controlled OHSMS documents are maintained outside of Corfix and include a Revision History table at the end of the document to record all changes.

4. The revision history of each document is updated to include:
    a) Revision number
    b) Issue date
    c) Document number
    d) Approval

DOCUMENT AVAILABILITY

To ensure the most up-to-date revisions of documents are readily available at the point of use, the following controls are in place:

1. Conduct regular inspections and audits to verify that current documentation is available.
2. Review site documentation at the start of each project and create project-specific folders to upload records.
3. Inform personnel of any document changes through e-mail and meetings.
4. Archive folders and documents in digital platforms to ensure users have access to the latest versions.
5. Regularly update project-specific printed binders.
6. Make documents available on the shared drive or project files.
7. Provide certain forms through the Corfix application.

The folders within the shared drive are restricted to authorized personnel only. Employees gain access to the shared drive by using their company login details. They can then access any relevant folders applicable to their projects while they are connected to the shared drive.

All field employees have access to Corfix and can login on their phone or on a computer with their login details.

Should there be any documentation that is required to be viewed by other interested parties (who do not have access to the shared drive), the documentation will be made available printed copy and posted on the safety board.

The HSE Department is responsible for ensuring that all OHSMS documentation posted on shared drive or Corfix are up to date. Site supervisors are responsible for ensuring that printed materials on site are up to date.

DOCUMENTS OF EXTERNAL ORIGIN

The following documents of external origin may be necessary for the planning and operation of the OHSMS. This list was established through consultation with the HSE Department and by reviewing legislation, client contract requirements, and industry standards.

Updates to the list of external documents will be reviewed during the management review meeting and processed according to the Management of Change procedure.

External documents include, but are not limited to:

1. CSA Standards.
2. COR™ Audit Program Guidelines, Standard, and Audit Tool.
3. Legislation (as defined in the Legislation Procedure).

4. Legislated Posters (e.g., WSIB Form 82, Prevention Starts Here).
5. Maintenance and Operator Manuals for vehicles, tools, equipment, and machinery.
6. Safety Data Sheets (SDS).
7. Client's Health and Safety Program.
8. WSIB forms for injury reporting.

OBSOLETE DOCUMENTS

Controls for managing obsolete documents are as follows:

1. Blank templates for forms are stored in a single location:
    a) on the Corfix application, or
    b) as printed copies in project binders.
2. Previous versions of documents are stored in archived folders accessible only to the HSE Department.
3. Program documentation available on the shared drive is maintained as current and up to date by the HSE Department. When a document is no longer required, the HSE Department will clearly label in the title of the document 'Obsolete'. The document (or previous version) will be moved to the HSE Department server in a folder that is clearly labeled archived. The HSE Department folder on the server is set up with permissions to restrict access to only authorized individuals in the HSE Department – no other employees have access to this folder.
4. Documentation required on project sites is reviewed at the start of each project to ensure obsolete documents are removed from circulation.
5. Any obsolete posted documents are removed and shredded or disposed of according to security requirements.

RECORD RETENTION

Frecon retains records to support the OHSMS). To identify which records are required for a project (or to support the OHSMS) the following steps are followed:

Step 1	The HSE Department reviews all project requirements including applicable legislation, work activities being performed on site, COR standards, equipment that will be used, testing required, client HSE requirements etc.,
Step 2	Required records that must be kept are outlined throughout procedures listed in the HSE Manual. Should additional records be required that are specific to a project site (such as a designated substance report), these records will be outlined in the site specific safety plan.
Step 3	The HSE Department or project manager will ensure that a site specific folder is set up for each job to store records relating to the project. All records are to be appropriately named when being saved and uploaded so they can easily be retrieved.
Step 4	Ensure that records are maintained on file indefinitely. The company ensures that regular back ups are performed to ensure that records are maintained.

The following controls are in place:

1. Records are maintained on file indefinitely.
2. Digital copies are stored within each project's folder.
3. Employee-specific records (e.g., WSIB claims, disciplinary records, health screenings) are stored in HR employee files.
4. All documents and records follow a consistent naming and numbering convention.
5. Uploaded project documents are placed in a designated safety folder and named for ease of identification.
6. Documents are generally typed to ensure legibility.
7. All documents are stored on the shared drive and organized in clearly labeled folders.
8. Site supervisors have access to the shared drive and maintain printed binders containing all relevant OHSMS documentation for the project.
9. Records may be handwritten or typed; if handwritten records are illegible, the record owner may be asked to provide clarification.
10. Records are stored to prevent damage or unauthorized alteration by restricting access to only those who require it.
11. Scanned records are named according to the record name and date.
12. Project specific records stored in physical or digital folders are clearly identified by project name.

PRIVACY AND CONFIDENTIALITY

Controls to ensure privacy and confidentiality of OHSMS documentation and records:

1. All OHSMS documentation and records are stored on a secure, shared drive.
2. OHSMS documentation that is contained in the HSE Manual is to be made available to all employees in a non-editable format. This is done by ensuring that only PDF versions are circulated. All word documents are controlled by the HSE Department.
3. All completed forms on Corfix are locked from editing once completed and finalized. Access to completed forms and records on Corfix are limited to authorized personnel only.
4. Access levels are set up by the HSE Department to ensure that only authorized personnel may view completed records in Corfix.
5. Access levels are assigned by management to ensure only authorized employees have access to specific folders.
6. Confidential employee records are maintained by management, the HSE Department, or the HR designate.
7. Access to confidential employee records is restricted exclusively to authorized personnel.
8. Records are not to be viewed, copied, or distributed outside of the designated authorized personnel.
9. For any printed documents or records, these will be kept in a locked filing cabinet at the head offices. Keys will only be controlled by the owners of the records.

REVISION HISTORY

REVISION	DESCRIPTION	DATE	APPROVAL
1	Procedure created		Douglas Drevniok
2	Updated to address COR internal audit feedback: • Clarified requirements for preventing the unintended use of obsolete documents • Clarified the process for determining documents and records required for the OHSMS • Clarified who has access to the server and platforms and how. • Added requirements for privacy and confidentiality and requirements for printed materials.	Aug 5, 2026	Douglas Drevniok

WORKPLACE VIOLENCE AND HARASSMENT PROCEDURE

PURPOSE

The purpose of this procedure is to protect all workers, visitors, and contractors by preventing, reporting, and responding effectively to incidents of workplace violence, harassment, or discrimination.

Workplace violence includes, but is not limited to, physical assault, threats, intimidation, verbal abuse, or any behavior that causes physical or psychological harm or creates a reasonable fear for personal safety.

No worker will be disciplined or penalized for reporting an incident in good faith. Confidentiality will be maintained throughout the investigation process, except where disclosure is required by law.

This procedure applies to all Frecon workers at all locations, including offices, jobsites, and work-related events.

ROLES AND RESPONSIBILITIES

Senior Management is responsible for:

1. Ensuring this procedure is implemented and reviewed annually.
2. Ensuring impartial investigations are conducted.
3. Contacting police or emergency services where required.
4. Implementing corrective actions following investigations.

Supervisors are responsible for:

1. Maintaining a safe work environment.
2. Being approachable and responsive to reports.
3. Immediately escalating reported incidents to Senior Management.
4. Ensuring workers understand and comply with this procedure.

Workers are responsible for:

1. Complying with this procedure.
2. Immediately reporting incidents, threats, or suspicious activity.
3. Cooperating fully in investigations.
4. Refraining from workplace violence, harassment, fighting, or horseplay.

PROCEDURE

This procedure outlines the steps to follow when addressing workplace violence, harassment, or discrimination. The steps are to be completed in the sequence as follows:

Reporting

1. Report any incident of workplace violence, harassment, discrimination, or suspicious activity immediately to your supervisor, senior management, or HR.
2. Reports can be made in person, by phone, or using form A-018 Incident Report.
3. Provide specific details: who, what, when, where, and any witnesses.
4. Do not attempt to intervene in physical altercations.

Emergency Response

1. In immediate danger, contact emergency services (911) without delay.
2. Follow any site-specific emergency procedures (e.g., SJP: Front Desk Emergency Response, SJP: Worker Summon Help).

Escalation

1. Supervisors must immediately escalate reports to Senior Management.
2. Senior management will determine if police or additional emergency response is needed.

Investigation

1. Investigations are initiated using form A-019 Incident Investigation.
2. Investigations should be completed promptly, ideally on the same day.
3. Protect the identity of the individual reporting wherever possible.
4. Employees may be suspended, with or without pay, if necessary to maintain safety and investigation integrity.

Corrective Action

1. Individuals (employees, contractors, visitors, vendors) found responsible for workplace violence, harassment, or policy violations will face disciplinary action, up to and including termination.
2. Senior management is responsible for reviewing outcomes, implementing corrective actions, and updating policies as needed.

RELATED FORMS AND DOCUMENTS

A-018	Accident / Incident Report
A-019	Incident Investigation Report
A-020	Warning Form
SJP	Front Desk Emergency Response
SJP	Worker Summon Help

REVISION HISTORY

REVISION	DESCRIPTION	DATE	APPROVED
1	Procedure created	February 1, 2026	Douglas Drevniok

HAZARD AND RISK ASSESSMENT PROCEDURE

PURPOSE

The purpose of this procedure is to identify, assess, and control hazards and risks associated with all operations, including office, shop, and project sites. The procedure ensures that hazards are recognized, assessed, and mitigated to protect all personnel and maintain a safe work environment.

SCOPE

This procedure applies to all Frecon workers, supervisors, project managers, sub-contractors, and visitors at all locations, including offices, shops, jobsites, and during work-related activities.

ROLES AND RESPONSIBILITIES

Senior Management is responsible to:

1. Provide input into hazard assessments when required.
2. Assign competent persons to complete hazard and risk assessments.
3. Review results of hazard assessments as part of the annual management review.

HSE Department is responsible for:

1. Developing and reviewing Site Specific Safety Plans (SSSPs) at the start of a project and as conditions change.
2. Completing audits of hazard assessments conducted on site.
3. Identifying applicable legislation, standards, or guidelines for the project site.
4. Investigating, reviewing and documenting reported hazards and corrective actions.
5. Ensuring critical tasks are identified and appropriate control measures are implemented.
6. Providing training and instructions to personnel involved in developing or reviewing hazard assessments.
7. Ensuring hazard assessments on file are updated at least annually.

Project Management is responsible for:

1. Advising the HSE Department of changes to project scope or new hazards.
2. Providing input into Site Specific Safety Plans.
3. Reviewing hazards reported on site when required.

Supervisors is responsible to:

1. Provide input into hazard assessments for the Site Specific Safety Plan.
2. Ensure hazard assessments are completed and signed by all personnel, including subcontractors.
3. Ensure hazard assessments are recorded digitally or scanned into the project folder.

4. Notify the Project Manager if updates to the Site Specific Safety Plan are required.
5. Investigate and follow up on hazards reported on site.
6. Ensure all personnel adhere to the requirements listed in hazard assessments.
7. Ensure workers review hazards during orientation.

Workers is responsible for:

1. Reviewing hazard assessments.
2. Reporting hazards or changes in scope of work immediately to their Supervisor.
3. Following all control requirements outlined in hazard assessments.

Subcontractors are responsible for:

1. Completing hazard assessments at project start-up and weekly thereafter.
2. Submit job hazard analysis, risk registers, or risk assessments covering their routine and non-routine work activities.

HAZARD AND RISK ASESSMENT PROCEDURE

Hazard and risk assessments are completed for all operations including the main offices and project sites. There are three (3) types of hazard and risk assessments as follows:

Site Specific Safety Plans (SSSPs)

1. Conducted before project start for the entire site.
2. Developed with input from senior management, project management, HSE Department, supervisors, clients, and workers.
3. Includes routine and non-routine tasks, human factors, and environmental conditions.
4. Job Hazard Analysis (JHA) created with risk ratings pre- and post-controls.

Field Level Hazard Assessments

1. Conducted daily before work commences or when new tasks arise.
2. Completed by the Supervisor or competent worker with input from the crew.
3. Reviewed and signed by all workers.
4. Updated if scope changes or non-routine tasks are introduced.

Office Hazard Assessments

1. Completed for offices, shops, and routine administrative tasks.
2. Reviewed annually or when changes occur (tasks, equipment, layout).

COMPETENCIES FOR CONDUCTING HAZARD ASSESSMENTS

The health and safety team is always involved in developing Site Specific Safety Plans (SSSPs). All team members have received formal training in hazard and risk management and are competent to identify, assess, and control hazards across all project sites and office locations. If a new HSE team member comes onboard, they will be required to take a hazard and risk management training course. They will also be tasked with completing an initial

hazard assessment for a project. The completed hazard assessment for the project will be evaluated and reviewed by another HSE Department team member. They will be evaluated to ensure that all hazards have been identified, that adequate controls are identified, that the risk rating matrix was followed and that all required fields on the form were adequately completed. If the hazard assessment was conducted as per this procedure and completed successfully, the employee will be deemed competent. Should any further coaching be required, the employee may receive additional training or shadow training from another trained member of the HSE Department.

Field level hazard assessments (FLHA) are conducted by Supervisors with input from workers. Frecon Supervisors are required to:

1. Have relevant experience in the construction industry.
2. Complete all mandatory health and safety training identified in the Training Needs Analysis.
3. Successfully complete the Supervisor Health and Safety Awareness course.

Once these training courses are completed, a member of the HSE department will review some of the initial FLHA's completed by the supervisor. These will be evaluated to ensure that all hazards have been identified, that adequate controls are identified, that the risk rating matrix was followed and that all required fields on the form were adequately completed. If the hazard assessment was conducted as per this procedure and completed successfully, the employee will be deemed competent. Should any further coaching be required, the employee may receive additional training or shadow training for another trained member of the HSE Department.

The HSE Department along with Senior Management is responsible for outlining what competencies are required. This is done by holding a meeting every year and as part of the management review process. The initial competencies have been outlined in this procedure, within job descriptions for specific roles and the process followed for evaluating competencies. Should changes need to be made to how competencies are assessed or identified, then this procedure will be updated by the HSE Department in conjunction with Senior Management. Should any job descriptions require updates, then the HR Designate will be involved with implementing the required changes.

SITE SPECIFIC SAFETY PLANS (SSSPs)

Each site will require a formal hazard assessment for the entire project. This hazard assessment is included within the Site Specific Safety Plan (SSSP) and provides an in-depth evaluation of hazards and risks specific to the work location.

SSSPs are developed before project commencement using a team-based approach, which may include input from senior management, the project management team, the HSE department, supervisors, suppliers, engineers, clients and workers.

The following steps are followed to get input on the hazard assessment:

Step 1 At a minimum, the project manager and a member of the HSE Department is involved with the initial development of the hazard assessment. The project manager and HSE team member will set up a meeting to review the scope of the project.

Step 2 Depending on the scope of the project and tasks that are performed, if additional technical expertise is needed to provide input into the hazard assessment, the project manager will set up a meeting with any additional persons required to attend or send the drafted hazard assessment to them by e-mail for comment and review.

Step 3 The drafted hazard assessment is sent to the site supervisor on site for review prior to project start up.

Step 4 The project manager and HSE Department will collect any further input or feedback on the hazard assessment and review/update as required.

Hazard assessments cover both routine and non-routine tasks, including human factors. Once a project has been awarded, a project kick-off meeting is scheduled to discuss the scope. The hazard assessment is developed based on this scope, and a Job Hazard Analysis (JHA) is created.

The Job Hazard Analysis contains the following:

1. Lists all hazards that may be encountered during all work activities
2. Assigns risk ratings pre and post control
3. Documents all control measures implemented

Human Factors Considerations

The project management team also reviews human factors, which may include:

1. Repetitive tasks or motions
2. Capacities of loads to be lifted
3. Tools used and how they interact with the worker
4. Physical demands of the job
5. Working conditions, such as indoor/outdoor work, temperature, and humidity
6. All human factor hazards are documented in the JHA to ensure proper risk control.

External Factors Considered

External factors are assessed to ensure a safe work environment. The process in place to identify these include:

1. Weather conditions – Assessed by reviewing the weather network reports for the day and throughout the shift. This is identified and recorded on the daily FLHA.
2. Conducting violence and harassment risk assessments – Completed for each project and reviewed annually. HSE Department, HR designate and project management are involved with ensuring that these hazards are recorded on the hazard assessment for the project.

3. Other contractors, subcontractors, or owner representatives – Reviewed during project start up to identify which parties are involved with the project. An initial site inspection takes place which includes reviewing site security to ensure that only authorized personnel have access the work site and that appropriate signage is in place.
4. Nearby traffic or vehicular hazards near the project site – Assessed using the Traffic Management Plan developed for site which includes how deliveries are coordinated and how to apply traffic control measures on adjacent roads to the job site.
5. HSE Department ensures all external hazards and associated controls are captured in the hazard assessment.

Hazard Identification Criteria

During project start-up, the Health and Safety team evaluates the legal requirements, standards, and guidelines applicable to the project (refer to the Legislation Procedure: HSE-PRO-015) using the following steps:

Step 1 Scope of the project is discussed during the project kick off meeting.
Step 2 HSE Department reviews and identifies applicable legislation, standards and other contractual HSE requirements.
Step 3 HSE Department will evaluate and review if any additional requirements are needed to comply with legislation, standards or guidelines. This can include developing additional control measures, providing additional training, posting additional signage etc.,
Step 4 Any specific control requirements mandated by legislation or standards are included in the SSSP.

Design and layout of the work area, ergonomics, machinery, and processes are also reviewed as part of the hazard assessment process using the following steps:

Step 1 Review any site maps, laydown areas, working surfaces, and engineered/project drawings.
Step 2 Identify if the design or layout of the project will create any hazards.
Step 3 Gather information on frequency of tasks, duration of tasks, working conditions, working environment, considering temperature, humidity, footprint of the work area, and site conditions.
Step 4 Review what equipment and machinery will be used. Review any equipment manuals to help identify any additional hazards or controls that may be required.
Step 5 Identify these hazards and their controls on the hazard assessment.

The Health and Safety Team member leading the assessment to ensure all hazards are identified and that controls are updated and clearly referenced in the SSSP.

REVIEW OF HAZARD ASSESSMENTS

Regular review of Site Specific Safety Plans (SSSP) and hazard assessments is essential to ensure hazards are accurately identified, controls remain effective, and the documents reflect current workplace conditions and operational activities.

Approval

Site Specific Safety Plans (SSSPs) and hazard assessments must be approved by the President, Project Manager, or a member of the HSE Department.

Conducting Hazard Assessments and Review Frequency

SSSP and hazard assessments must be conducted prior to the commencement of any task or project using following steps:

Step 1 Management will inform the project management team and HSE Department once a project is confirmed with a start date.

Step 2 The project manager and HSE department will meet to review the scope of the project and draft the hazard assessment. This must be done well in advance of the project start date.

Step 3 The review will include reviewing what equipment, materials, substances or processes are involved for the project. The project manager will ensure that this information is communicated to the HSE Department during the meeting.

Hazard assessments are also updated and reviewed at a minimum of annually, or whenever any of the following changes occur:

1. Changes in equipment, tools, or machinery
2. Introduction of new materials, products, or substances
3. Changes in processes
4. Changes in personnel or resources
5. Changes in the environment or working conditions
6. When changes to the OHSMS may impact workplace operations or activities
7. If a workplace incident occurs

Should any changes be made to the OHSMS that may impact workplace operations or work activities, the management of change process (as part of Element 14.2) will be followed. This includes completing a change management form, updating hazard and risk assessments, identifying if further control programs are required, communicating the changes and identifying if additional training is required. The HSE Department is responsible for ensuring that this process is followed.

Updates

Regular project meetings take place to discuss any changes to the scope of work. The project manager is responsible for informing the HSE Department if updated the safety documentation is required. The HSE Department tracks review periods to ensure all hazard assessments receive at least an annual review.

FIELD LEVEL HAZARD ASSESSMENTS

Field Level Hazard Assessments (FLHA) are conducted at the start of each project and daily thereafter at every site prior to the commencement of work. If more than one (1) crew is

present on site performing different tasks, a separate hazard assessment shall be completed to ensure all work activities are accurately documented.

The purpose of the FLHA is to identify hazards present on site that are associated with the specific tasks being performed that day and to determine the necessary controls.

A daily Field Level Hazard Assessment, form A-001, is completed by the Supervisor or a designated competent worker with input from the crew. This will detail the scope of work to be performed, list the specific PPE required, and indicate the hazards and controls that are in place for the work activities. Once completed, the FLHA is reviewed with all affected workers and signed off prior to commencing work.

If the scope of work or site conditions change during the shift, the Field Level Hazard Assessments shall be updated and reviewed again with workers before continuing work.

Where non-routine tasks arise, a Field Level Hazard Assessment must be completed and reviewed by the Supervisor, the worker(s) involved, and the HSE Department prior to proceeding.

Subcontractors may choose to use their own template to complete Field Level Hazard Assessments or use Frecon's Field Level Hazard Assessment template. The Supervisor or HSE Department will perform random audits to ensure that Subcontractors are completing field level hazard assessments.

OFFICE HAZARD ASSESSMENTS

Hazard assessments have been developed for the office, shop, and for routine tasks performed by administrative personnel.

These hazard assessments were developed with input from workers, the HSE Department, and management. The names of individuals involved in the development and/or review of each hazard assessment are logged in the hazard assessment document.

Hazard assessments are reviewed at a minimum annually and are maintained by the HSE Department.

Hazard assessments are also reviewed and updated whenever changes occur, including but not limited to:

1. Any change identified through the Management of Change procedure
2. Changes in job tasks or responsibilities
3. Introduction of new equipment or materials
4. Changes to workspace layout

Management meets regularly with the HSE Department to review any changes part of the Management of Change program. The HSE Department is responsible for organizing the review of the hazard assessment and re-issuing them to affected personnel.

REPORTING HAZARDS

If any actual or potential hazards are identified by personnel on site, and the Supervisor notified immediately.

If the hazard cannot be corrected or controlled immediately, the area must be cordoned off to prevent access. Appropriate control measures must be implemented before work continues. Any action items required will be tracked in Corfix.

RISK RATING METHODOLOGY

The following risk rating matrix is used to complete hazard and risk assessments.

Risk levels are calculated by assessing the likelihood and severity of an actual or potential hazard that could result in injury or incident. Identified hazards are assessed prior to the implementation of controls to establish the initial risk rating. Risk levels for identified hazards are assessed prior to putting controls in place and then re-assessed post controls to ensure that the controls identified were adequate in controlling the risks.

Risk Matrix

Severity \ Likelihood	1	2	3	4	5
1	LOW 1	LOW 2	LOW 3	MED 4	MED 5
2	LOW 2	MED 4	MED 6	HIGH 8	HIGH 10
3	LOW 3	MED 6	HIGH 9	HIGH 12	EXT 15
4	MED 4	HIGH 8	HIGH 12	HIGH 16	EXT 20
5	MED 5	HIGH 10	EXT 15	EXT 20	EXT 25

Low Risk May require warning signs and or protective clothing

Medium Risk Will require training, guarding or both or other forms of risk reductions.
Whatever combination of measures is identified the results must be low risk

High Risk Prevent or discontinue. Revise or replace task to achieve Medium or Low Risk.

Severity

1 Insignificant: no negative consequences, will not pose any significant threats to a project /organization

2 Minor: small potential for negative consequences. Example: first aid injury

3 Moderate: hazards that have the potential to cause negative consequences

4 Critical: hazards that are known to cause negative consequences (medical aid injuries, lost-time)

5 Catastrophic: Example: could cause a fatality, disabling injury, explosion, fire

Likelihood

1 Unlikely: risk of occurring is very rare
2 Seldom: risk is uncommon but has happened in the past
3 Occasional: risk is known to occur and would have a 50/50 chance of taking place
4 Likely: very likely to occur, known to have happened and high chance of taking place
5 Definite: risk is almost certain to occur

If, after completing a hazard and risk assessment, additional controls or corrective measures are required to further reduce the likelihood or severity of an incident, these actions are documented on the Job Hazard Assessment (JHA).

If, after controls have been implemented, an "Extreme" or "High" risk rating (score of 8–25) remains, additional controls must be identified and implemented to further reduce the risk to an acceptable level.

Any work activity with a pre control risk rating greater than 8, is classified as a critical task. For all critical tasks, specific safe work procedures will be developed and implemented to effectively control the hazard.

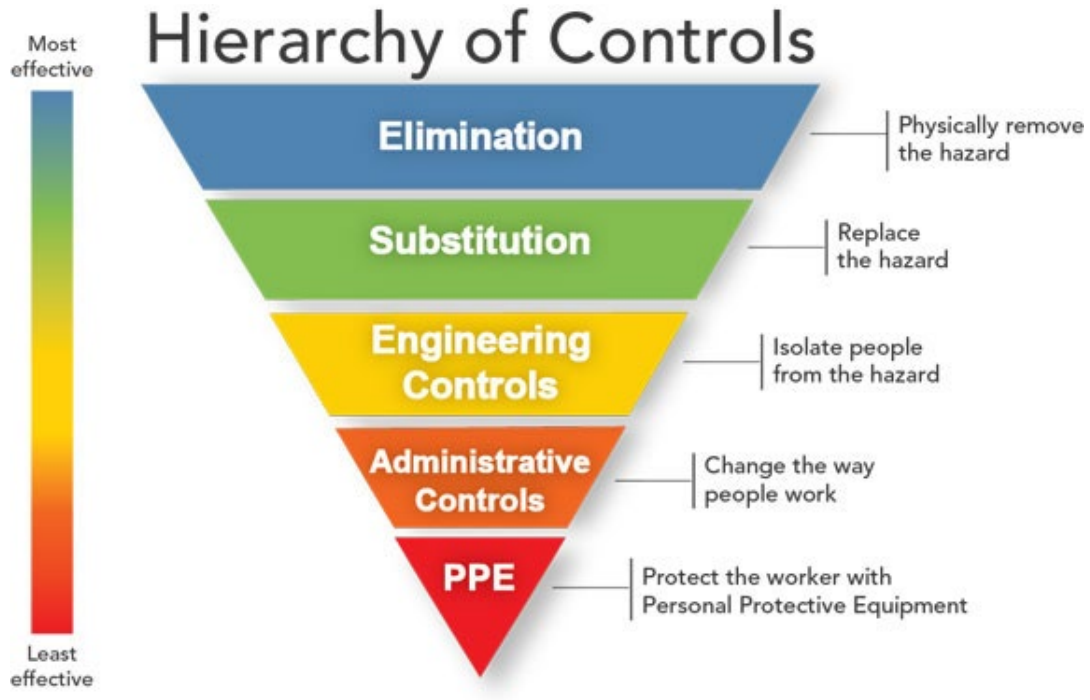
HIERARCHY OF CONTROLS

When assessing which controls to put in place to control hazard and risks, the Hierarchy of Controls will be applied.

Priority will be given to the most effective control measures, including elimination, substitution, and engineering controls, rather than relying solely on less effective measures such as administrative controls or personal protective equipment (PPE).

The individual responsible for completing the hazard assessment will review the Hierarchy of Controls and ensure that appropriate and effective control measures are selected and implemented.

The Site Specifical Safety Plans will include a reference to which hierarchy each control measure belongs to. The diagram below illustrates the Hierarchy of Controls, arranged from most effective to least effective.



Based on the risk assessment process and application of the Hierarchy of Controls, the following work activities have been identified as critical tasks requiring specific safe work procedures.

List of Critical Tasks

Using Step Ladder
Concrete Saw Cutting
Confined Space
Installing Formwork
Fire Protection and Spills
Power Elevating Work Platform
Propane & Temporary Heat
Guardrails

REFERENCES

A-001 Daily Field Hazard Assessment
A-009 Weekly Supervisor Site Inspection
A-018 Accident/Incident Report
Site Specific Safety Plan

REVISION HISTORY

REVISION	DESCRIPTION	DATE	APPROVAL
1	Procedure created.	Feb 1, 2026	Douglas Drevniok
2	Updated with revised risk rating methodology.	Jun 1, 2026	Douglas Drevniok
3	Updated to address the COR internal audit comments: • Clarified how competencies are established and evaluated • Clarified the process for involvement in the hazard assessment process • Clarified when hazard assessments are conducted and the process • Clarified how external factors are considered • Clarified how legal requirements are considered • Clarified how layout and design are considered	Aug 5, 2026	Douglas Drevniok

CONTROLS PROCEDURE

PURPOSE

The purpose of this procedure is to establish requirements for the development, implementation, review, and communication of control measures to eliminate or reduce workplace hazards. This procedure ensures that control programs, including Safe Job Procedures and hazard assessments, are consistently applied to protect workers, subcontractors, and visitors from injury, illness, and property damage.

SCOPE

This procedure applies to all company operations, worksites, employees, supervisors, managers, subcontractors, and visitors. It covers the development and maintenance of Safe Job Procedures, the identification of controls through hazard assessments, the application of the hierarchy of controls, and the communication of control measures across all levels of the organization.

ROLES AND RESPONSIBILITIES

Senior Management is responsible for:

1. Approving all control measures and conducting an annual review of Safe Job Procedures.
2. Providing adequate resources to ensure control measures are implemented and maintained.
3. Assigning competent personnel on jobsites to ensure control measures are followed and implemented.

The HSE Department is responsible for:

1. Ensuring control measures are readily accessible for employees via the shared drive or project files. Certain controls are also available on the Corfix application.
2. Maintaining the Safe Job Procedure document library and ensuring documents are reviewed in accordance with document control requirements.
3. Coordinating participation of managers and workers in the development and review of control programs (e.g., Safe Job Procedures).
4. Updating control measures when regulatory requirements change or when new technologies or industry best practices are introduced.
5. Identifying and documenting which level of the hierarchy of controls each control falls under within hazard assessments.

Supervisors are responsible for:

1. Ensuring Safe Job Procedures and all relevant controls are readily available on site.
2. Monitoring employees to ensure control measures are followed.
3. Enforcing control measures on site.
4. Reporting concerns regarding control measures to management.

5. Providing recommendations for improvements to control measures and obtaining management approval for revised controls.

Workers are responsible for:

1. Reading and acknowledging Safe Job Procedures applicable to their role or assigned tasks.
2. Reviewing hazard assessments to understand the required control measures.
3. Reporting concerns and asking questions regarding control measures.
4. Reporting any violations or contraventions of control measures.

CONTROL PROGRAM

The company has developed written control program called *Safe Job Procedures* for tasks performed by the company.

Developing Safe Job Procedures

When developing a new Safe Job Procedure, input is obtained from the Joint Health and Safety Committee (JHSC) and/or workers and managers with technical expertise in the task. This may occur during a JHSC meeting, distributing the documents for commenting or through an on-site review of work steps. During the JHSC meeting, the *Safe Job Procedures* will be distributed and discussed. Should any workers or managers have input on the documents, notes will be made on the JHSC meeting minutes and submitted to the HSE Department for review. Should the *Safe Job Procedures* be reviewed by workers and managers on site, input will be collected either by e-mail or reviewing any notes made on printed copy documents. This feedback will then be reviewed by the HSE Department and suggestions are then marked up on the *Safe Job Procedure*.

Once drafted, the procedure is submitted to Senior Management for approval, either via email or in-person meeting. Upon approval, the document is:

1. Assigned a document number.
2. Uploaded to the Company shared drive.
3. Logged in the document numbering system.

Reviewing Safe Job Procedures

Existing Safe Job Procedures are reviewed either during JHSC meetings or with workers and managers involved in the relevant tasks. During the JHSC meeting, the *Safe Job Procedures* will be distributed and discussed. Should any workers or managers have input on the documents, notes will be made on the JHSC meeting minutes and submitted to the HSE Department for review. Should the *Safe Job Procedures* be reviewed by workers and managers on site, input will be collected either by e-mail or reviewing any notes made on printed copy documents. This feedback will then be reviewed by the HSE Department and suggestions are then marked up on the *Safe Job Procedure*. Feedback is documented and

proposed changes are submitted to Senior Management for approval via email or in-person meeting.

Approved revisions are:

1. Uploaded to the Company shared drive.
2. Documented in the revision history table.

Safe Job Procedures are reviewed at a minimum every three (3) years. The HSE Department is responsible for tracking review timelines.

When developing or reviewing controls, the HSE Department will consult applicable legislation, regulations, standards, guidelines, manufacturer manuals, and client site requirements. The Company's register of applicable legislation and standards (Element 13) will be used as a reference. The following specific steps will be followed:

Step 1 The list of legislation and applicable standards (including manufacturers manuals) will be reviewed for the tasks or control program that are developed.

Step 2 The HSE Department will review the content of the *Safe Job Procedure* to ensure that regulatory compliance is achieved and that any requirements outlined in these documents is reflected in the *Safe Job Procedure*. Examples of items to review include requirements for documentation, inspection, ensuring that any forms or associated procedures are up to date, that the appropriate equipment and controls are in place etc.,

Step 3 Should any additions or modifications be required to the procedure, the steps outlined above for review and approval will be followed.

Any changes to legal or other requirements are managed through the management of change process (Element 14.2). Any updates will be tracked and managed through this process for any regulatory updates that may affect *Safe Job Procedures*.

CONTROLS IDENTIFIED IN HAZARD ASSESSMENTS

Additional controls are identified through the Company's hazard assessments. Hazards associated with specific tasks are evaluated and required control measures are documented accordingly.

Hierarchy of Controls

When determining appropriate control measures, the Company applies the hierarchy of controls. Controls are considered from most effective to least effective as follows:

1. Elimination
2. Substitution
3. Engineering Controls
4. Administrative Controls
5. Personal Protective Equipment (PPE)

Preference is given to higher-level controls (e.g., elimination, substitution, engineering) wherever reasonably practicable. Start at the top of the list and work down. Try to completely eliminate or substitute the hazard first. If you cannot remove it, use engineering controls and administrative controls to isolate people. Use personal protective equipment (PPE) as a final backup.

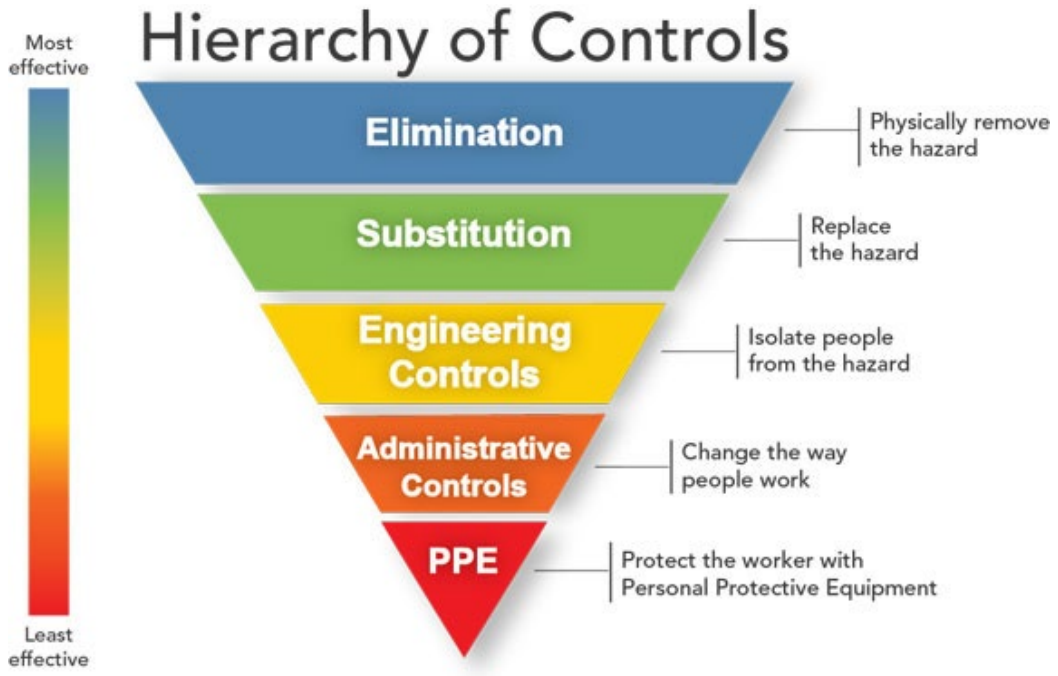
Check the top first: Always ask if you can get rid of the danger entirely before looking at other choices.

Do not skip down early: Only move to a lower step if the higher step is impossible or does not fix the problem completely.

Layer your controls: Use more than one method together. For example, use an exhaust fan (engineering) along with employee training (administrative) and safety glasses (PPE).

The level of the hierarchy applicable to each control is identified within the hazard assessment. The team completing the hazard assessment is responsible for ensuring the hierarchy of controls is properly considered.

The diagram below illustrates the hierarchy of controls used by the Company when determining appropriate measures to eliminate or reduce workplace hazards.



COMMUNICATION

The Company ensures that all control measures are effectively communicated, understood, and acknowledged by affected personnel to support safe work practices and regulatory compliance.

Daily Hazard Assessments

Daily Hazard Assessments are communicated at the start of each shift to all personnel on site and are documented within Corfix. This process includes:

1. Reviewing hazards.
2. Reviewing associated control measures.
3. Obtaining sign off from workers, subcontractors, or visitors confirming their understanding and commitment to comply.

Hazard Assessments

Formal job hazard assessments (JHAs) are reviewed with personnel annually for tasks they perform. Reviews may be conducted during:

1. Company safety meetings.
2. Remote meetings.
3. In-person orientations.
4. Through the Corfix application.

Personnel acknowledge their understanding of the hazards and required control measures by signing off on the assessment.

New hires review all relevant JHAs within their first two (2) weeks of employment.

When updates are made to a JHA, the revised document is re-communicated and re-acknowledged.

Site Specific Safety Plans

Controls outlined in the Site Specific Safety Plans are reviewed mandatory site orientation for all workers, subcontractors and visitors prior to commencing work.

Safe Job Procedures

Safe Job Procedures are communicated to workers prior to performing the applicable task. Communication may occur through:

1. Toolbox talks.
2. New hire orientation.
3. Site-specific meetings.

Where other workplace parties require notification of control measures, they will be provided a copy via email and informed of where the documents are located on site.

Control Program Availability

All control programs are available digitally via the shared drive or project files, and most are accessible through the Corfix application. The HSE Department ensures that only the most current revisions are available and posted digitally.

The following steps are in place:

Step 1 Once a new control program is developed it is added to the document library on the shared drive and on Corfix.

Step 2 For existing control programs, the previous versions are first archived and then the new version is uploaded.

The HSE Department and Senior Management are responsible for ensuring that all workers are appropriately given access to the shared drive or Corfix upon hire. This is part of the new worker on-boarding journey. Should workers experience any issues with logging in to the shared drive or Corfix, they are to reach out to their Supervisor or the IT department for further guidance.

For printed control programs, the Supervisor on site is responsible for ensuring that the documents are readily available. This may be the case for projects with restricted access phones/computers. The documents are always available in the main site trailer and posted on the safety board. Regular site inspections take place to ensure that safety boards are up to date with all printed materials including any control programs applicable to the project site.

REFERENCES

A-001 Daily Field Level Hazard Assessment
Safe Job Procedures

REVISION HISTORY

REVISION	DESCRIPTION	DATE	APPROVAL
1	Procedure created.	Feb 1, 2026	Douglas Drevniok
2	Procedure updated to address COR comments from Internal Audit: • Clarified how the hierarchy of controls is implemented • Clarified how management and workers are involved with the development and review of controls • Clarified how legal and other requirements are considered • Clarified how control programs are made available	Aug 5, 2026	Douglas Drevniok

SUBCONTRACTOR MANAGEMENT PROCEDURE

PURPOSE

The purpose of this procedure is to outline Frecon's procurement and subcontractor management requirements, including how subcontractors and service providers are selected, approved, monitored, and evaluated to ensure compliance with occupational health and safety requirements.

SCOPE

This procedure applies to all subcontractors and service providers engaged by Frecon and to all Frecon personnel involved in their selection, monitoring, and evaluation.

ROLES AND RESPONSIBILITY

Senior Management is responsible for:

1. Inform Health and Safety when new subcontractors are required
2. Review subcontractor performance during the Management Review Meeting
3. Review this procedure annually as part of the Management Review

Project Management is responsible for:

1. Ensure subcontractors are pre-qualified prior to commencing work
2. Upload required subcontractor documentation to project files
3. Lead subcontractor evaluations
4. Review performance issues with subcontractors when required

Supervisors are responsible for:

1. Enforce disciplinary measures for subcontractors under their control
2. Monitor subcontractor work and required safety documentation
3. Ensure subcontractors receive site-specific orientation
4. Report safety infractions to Management and Health and Safety
5. Provide input during evaluations

The HSE Department is responsible for:

1. Review subcontractor pre-qualification packages
2. Advise Senior Management of subcontractors not meeting minimum requirements
3. Participate in subcontractor evaluations
4. Conduct random site audits

Subcontractors are responsible for:

1. Adhere to this procedure
2. Provide required documentation for pre-qualification and evaluation
3. Report significant changes to their work
4. Complete daily hazard assessments while on site
5. Submit project-specific documentation as requested

SELECTION AND APPROVALS

Frecon maintains a pre-qualification program to review and approve subcontractors prior to commencing work. This program ensures subcontractors demonstrate the competency and ability to identify, assess, and control hazards arising from their work.

Pre-qualification review includes:

1 Safety performance metrics and incident history.
2 Liability insurance.
3 WSIB clearance (or provincial equivalent).
4 Training competencies.
5 Health and Safety Manual and supporting documentation.
6 Hazard assessments and emergency response plans.

Client-mandated subcontractors will still be subject to Frecon's pre-qualification review.

Approval Criteria

Subcontractors must meet the following minimum requirements:

Criteria	Approval Requirements
Liability Insurance	Current and meeting limits set by Senior Management
WSIB	Valid clearance certificate
Training	Minimum: MLITSD 4-Step/5-Step, WHMIS, Working at Heights. Additional task-specific training as required (e.g., Confined Space, First Aid, Equipment Operation).
Health & Safety Manual	Current manual with policy dated within the last year
Safe Work Procedures	Demonstrated hazard control procedures relevant to scope of work
Hazard Assessments	Site-specific hazard assessment and completion of daily hazard assessments
Safety Performance	WSIB Safety Check performance reviewed relative to industry rate group

SELECTION/PRE-QUALIFICATION PROCESS:

1. Project management to issue the subcontractor the Pre-Qualification Package by e-mail.
2. The received package and supporting documentation are collected by the project management team (PMT) and filed in the subtrade folder on the jobfile drive.
3. The HSE Department is notified by PMT when the completed pre-qualification package is ready for review.
4. The HSE Department will evaluate the competency of the subcontractor to be able to assess/analyze and control hazards arising from their own work that may impact the organization's workers. This will be done using the approval criteria listed above in this procedure.
5. Should a pre-qualification be incomplete or require further clarification, the HSE Department will review with the project management team.
6. If a subcontractor is approved and has demonstrated they meet all the selection criteria, the HSE Department will sign the subcontractor pre-qualification form.
7. Exemptions may be granted on a case-by-case basis with Management approval. This can include if a subcontractor does not meet all requirements listed above. Additional control measures may be put in place for this subcontractor such as increased monitoring, additional HSE field inspections, additional meetings with the subcontractor to review performance, or a subcontractor evaluation may be performed within the first few weeks of work.
8. If any exemptions are made, these will be documented on the pre-qualification form and communicated to the project manager and site supervisor.

MONITORING

Subcontractors are monitored through:

1. Supervisor site walkthroughs and inspections: Supervisors will ensure that their walkthroughs include areas where subcontractors are working. Inspections involve performing observations on site and speaking with workers.
2. Documentation review such as performing spot audits on completion of paperwork (hazard assessments, pre-use inspections, safety talks etc.,) and reviewing training records.
3. Random audits conducted by the HSE Department. These audits include reviewing compliance with legislated requirements, having discussions with subcontractors on site to assess knowledge of procedures and hazards, as well as reviewing completed documentation on site.

Whenever subcontractors are present on site, a designated Frecon supervisor will be present to actively monitor all site activities. This enables Frecon to ensure that orientations are provided to all subcontractors on site, any required permits are completed and that safety rules on site are being enforced.

Deficiencies are documented on inspection forms or as safety warnings and brought to management's attention either by e-mail or by reviewing the issues at a project meeting. The issues are reviewed with the subcontractor. Should additional control measures be required

to be put in place to monitor the subcontractor, these will be communicated via e-mail to all required parties.

SUBCONTRACTOR EVALUATION

Subcontractors are formally evaluated upon completion of their work on site. The Project Management leads evaluations with input from the Supervisor. Evaluations are documented using F1915 Subcontractor Evaluation Form.

Evaluation criteria include:

1. Safety documentation compliance.
2. Incident history and disciplinary records.
3. MLITSD visits.
4. Hazard assessments and Safe Job Procedures.
5. Emergency preparedness.
6. PPE compliance.
7. Housekeeping.
8. Safety communication.

The following process is followed:

1. The subcontractor is finished working on site and notifies the project manager.
2. The project manager collects input from the site supervisor and the HSE Department on the performance of the subcontractor.
3. This evaluation is documented on F-1915 Subcontractor Evaluation Form.
4. The form is then submitted to the HSE Department for review and filing.
5. Should the subcontractor have an unsatisfactory performance, corrective measures will be discussed with Senior Management and the project manager.
6. Any corrective measures required will be tracked for completion by the HSE Department and project management team.

HAZARD ASSESSMENTS AND CONTROL PROGRAMS

Subcontractors are required to complete daily hazard assessments while on site, and additional task-specific hazard assessments may be required prior to commencing high-risk work.

Hazard assessments must be completed prior to starting work. The following steps are followed for subcontractors to complete a hazard assessment:

Step 1 Work tasks and work locations for the day are reviewed to determine what hazards apply.

Step 2 The work tasks and hazards are documented on the field level hazard assessment. The template used can be the subcontractor's template or Frecon's template.

Step 3 The field level hazard assessment is reviewed with all crew members involved with the task. All workers involved with the work task are to sign off on the hazard assessment.

Step 4 Should work tasks change throughout the shift or new hazards present themselves, the subcontractor is to review their hazard assessment and re-communicate the changes to their employees.

Any additional hazard and risk assessments that may be required for higher risk work will be reviewed in advance of works taking place by the HSE Department.

As part of the pre-qualification process, subcontractors must also provide applicable Safe Job Procedures to demonstrate adequate hazard controls. The HSE Department in conjunction with the project management team will review the submitted Safe Job Procedures to ensure they are reflective of the tasks being performed and appropriate for the scope of work. If sufficient procedures are not available, Frecon's Safe Job Procedures will be implemented at a minimum.

COMMUNICATION

Subcontractors must notify Frecon immediately of changes including:

1. Hazardous products.
2. Traffic management plans.
3. Scope of work.
4. Equipment or tools.
5. Site setup.
6. Personnel changes.

Change requests must be submitted in writing per contractual agreements. Frecon may communicate updates via:

1. Email.
2. Toolbox talks.
3. Meetings.
4. Contract amendments.

All subcontractors must receive site-specific orientation prior to starting work.

MULTI-EMPLOYER WORKPLACES

When Frecon acts as the Constructor, subcontractors must adhere to Frecon's Health and Safety Program as well as all applicable legislation, with Frecon coordinating site-specific safety requirements.

The following processes are in place:

1. Authority for the site is designated by Senior Management. A list of key contacts and information on the constructor is posted on the safety board along with the Notice of

Project. Authority of the site is then communicated to all personnel during the site-specific orientation.

2. Frecon holds regular meetings with key subcontractors on site to review progress of the project, discuss work areas and any OHS concerns brought forward by subcontractors. The project management team sets up meetings and invites the subcontractors to attend. JHSC meetings are also held when required by legislation to discuss any safety concerns or recommendations brought forward by the JHSC.

When acting as an Employer under another Constructor, Frecon will comply with both its own Health and Safety Program and the Constructor's site-specific program. Frecon will attend any required site coordination meetings and participate in any JHSC meetings.

For work conducted in occupied buildings or public spaces, project management will review with the HSE Department how to coordinate work activities for multi-employers or members of the public. A meeting will be held to review the scope of the project and any required measures will be listed in the site-specific safety plan. These measures can include site separation such as barricades, fencing, and signage such as hazard signage, no entry signage etc. Coordination meetings will be held as required with clients or occupants of the building to discuss any specific OHS requirements. These meetings are scheduled by the project manager.

REFERENCES

F-1914 Subcontractor Pre-Qualification Package
F-1915 Subcontractor Evaluation Form

REVISION HISTORY

REVISION	DESCRIPTION	DATE	APPROVAL
1	Developed procedure.	Feb 1, 2026	Douglas Drevniok
2	Updated procedure to address the COR internal audit comments: • Clarified the process for subcontractor selection, monitoring and evaluation • Clarified subcontractor hazard assessment process • Clarified process for multi-employer workplaces	Aug 5, 2026	Douglas Drevniok

COMPANY RULES PROCEDURE

PURPOSE

This procedure outlines how Company Rules are developed, communicated, and enforced. It ensures all workplace parties understand their obligations and that non-compliance is addressed in a fair and consistent manner.

ROLES AND RESPONSIBILITY

Senior Management is responsible for:

1. Establishing and reviewing Company Rules annually.
2. Approving revisions to Company Rules.
3. Enforcing the Progressive Disciplinary Procedure.
4. Reviewing disciplinary records to ensure rules are applied consistently.
5. Conducting employee performance reviews, as required.

HSE Department is responsible for:

1. Ensuring a copy of the Company Rules is provided to each new employee as part of the hiring package.
2. Ensuring Company Rules are available electronically.
3. Assisting with the development of site-specific safety rules for projects.
4. Maintaining acknowledgement forms and orientation records.

Supervisors are responsible for:

1. Enforcing Company Rules for all personnel under their supervision.
2. Ensuring discipline is documented in accordance with the Progressive Disciplinary Procedure.
3. Communicating Site-Specific Rules to employees, subcontractors, and visitors during site orientation.

Workers are responsible for:

1. Complying with all Company Rules.
2. Reporting any breach of Company Rules to their supervisor.
3. Attending company orientation and seeking clarification on any rules not understood.

Subcontractors are responsible for:

1. Complying with all Company Rules and site-specific safety rules.

PROCEDURE

Development of General and Site-Specific Rules

General Company Rules apply to all employees and all projects. These rules are developed by the HSE Department in consultation with Senior Management through:

1. Review of applicable legislation, including the OHSA.
2. Industry standards and best practices.
3. Scope of work performed.
4. Incident trends and hazard assessments.
5. Management Review outcomes.
6. Management of Change discussions.

Updates to Company Rules are reviewed at least annually, or more frequently as required due to legislative changes, incident trends, or operational needs.

Project-specific safety rules are developed when required based on client requirements, site conditions, or identified hazards. At the start of each project, a project start-up meeting is conducted with the client to determine whether additional site-specific safety rules are necessary. Where additional rules are identified, they are documented in the Site Specific Safety Plan and communicated to all employees, subcontractors, and visitors during the site specific Orientation prior to the commencement of work.

If no additional site-specific safety rules are required, the General Company Rules shall apply for the duration of the project.

Provision of Company Rules

Company Rules are formally documented in FC-HSE-STN-002. A copy of the Company Rules is provided to each employee upon hiring as part of the onboarding package. Copies are also posted on site safety boards, where applicable, and made available digitally to all employees to ensure ongoing accessibility.

When updates to the Company Rules are made, the revised version is re-issued by the HSE Department to all affected employees. Employees are required to review the updated rules and sign an acknowledgement form confirming their understanding and acceptance of the revisions.

Communicating Company Rules

General Company Rules are explained to workers during New Hire Orientation and are provided as part of the new hire package. Project-specific safety rules are communicated during the site-specific Orientation prior to commencing work. When new employees, subcontractors, or visitors arrive on site, the Supervisor coordinates and ensures completion of the required orientation before access to the work area is granted.

Where a worker may have difficulty reading, the individual conducting the orientation will review and verbally explain the rules to ensure understanding. If a worker does not speak English, appropriate arrangements, including the use of a translator, will be made to ensure the worker fully understands the Company Rules and Site-Specific Safety Rules.

All employees are required to sign an Orientation Acknowledgement Form confirming they have received, read, and understood the applicable rules and requirements.

Enforcement of Company Rules

Company Rules are enforced consistently by the management team and Supervisors through active monitoring, regular inspections, and ongoing field observations.

Where a worker fails to comply with Company Rules, the Progressive Disciplinary Procedure FC-HSE-PRO-017 will be implemented as developed collaboratively by Management, Human Recourses and the HSE Department. The procedure outlines violations and identifies the disciplinary step that may be taken. All disciplinary actions taken will be documented and maintained in accordance with company requirements.

Enforcement of Company Rules will be applied fairly and consistently, and in alignment with applicable Collective Agreements. Where required, disciplinary matters will be reviewed with the Union.

REFERENCES

A-020	Safety Warning Form
FC-HSE-PRO-017	Progressive Discipline Procedure
FC-HSE-STN-002	General Company Rules

REVISION HISTORY

REVISION	DESCRIPTION	DATE	APPROVED BY
1	Procedure created.	Aug 6 2026	Douglas Drevniok

PROGRESSIVE DISCIPLINARY PROCEDURE

PURPOSE

This procedure describes the disciplinary actions used by Frecon to enforce our company policies and OHS legislation in a fair and consistent manner. This procedure is applicable to all workers, including subcontracted workers on site.

ROLES AND RESPONSIBILITY

Senior Management is responsible for:

1. Establishing and reviewing the Progressive Disciplinary Procedure annually.
2. Approving revisions to the Progressive Disciplinary Procedure.

HSE Department is responsible for:

1. Ensuring a copy of the Progressive Disciplinary Procedure is provided to each new employee as part of the hiring package.

Supervisors are responsible for:

1. Ensuring all personnel under their supervision follow Frecon's safety program and OHS legislation by actively monitoring workers and routine inspections.
2. Ensuring disciplinary actions are documented using form A-020: Safety Warning.
3. May halt all related work and remove personnel, including any direct or indirect subcontractors from a jobsite for non-compliance.

Workers are responsible for:

1. Complying with Frecon's safety program and OHS legislation.
2. Seeking clarification on any rules or regulations that are not understood.
3. Reporting personnel that are non-compliant to their supervisor.

Subcontractors are responsible for:

1. Reviewing and understanding Frecon's safety requirements prior to job start-up
2. Ensuring all direct workers and all indirect (subtrade) workers comply with Frecon's safety program, legislative requirements and Site-Specific Safety Rules.
3. Reporting personnel that are non-compliant to their supervisor/Frecon's site superintendent.

PROCEDURE

Compliance with the health and safety policies, procedures and legislation is a condition of employment with Frecon.

Violations

Discipline is intended to be constructive and an aid in correcting unacceptable conduct or work habits. The violations listed below are examples of behaviour contravening Frecon's safety program and will result in a safety warning. Warnings are intended to give employees

the opportunity to alter their behaviors to improve workplace safety before an accident occurs.

1. Not wearing hard hat, safety boots
2. Failure to follow instructions
3. Not wearing property PPE
4. Violation of company rules
5. Harassing another worker/supervisor
6. Violation of HS policies/procedures
7. Using broken equipment
8. Not using a harness properly
9. Willful damage to material or equipment
10. Falsifying time records

Enforcement

Failure to comply with Frecon's Health & Safety program, safety instructions or procedures and all applicable legislation will result in progressive disciplinary action.

Disciplinary action may call for any of four steps:

1. Verbal warning
2. Written warning
3. Suspension with or without pay
4. Termination of employment

Generally, a first offense may call for a verbal warning; a next offense may be followed by a written warning; another offense may lead to a suspension. Frecon recognizes that there are certain matters that are serious enough to justify either a suspension, or even termination of employment, without going through the usual progressive discipline steps.

Failure to comply with OHSA and legislative requirements will result in removal from a jobsite. The removal of a subcontractor's worker may result in the cancellation of the sub-contract and the said worker is not authorized to return the jobsite without expressed management approval.

This Progressive Disciplinary Procedure will be applied fairly and consistently, and in alignment with applicable Collective Agreements. Where required, disciplinary actions will be reviewed with the Union.

SAFETY WARNING NOTICE

Form A-020 is used to record warnings. This form can be signed by both the worker and issuer. Completed forms are filed as per FC-HSE-PRO-001, Document Control Procedure.

REFERENCES

A-020 Safety Warning

REVISION HISTORY

REVISION	DESCRIPTION	DATE	APPROVAL
1	Procedure created	February 1, 2026	Douglas Drevniok

PERSONAL PROTECTIVE EQUIPMENT PROCEDURE

PURPOSE

The purpose of this procedure is to establish requirements for the selection, provision, use, inspection, maintenance, and documentation of Personal Protective Equipment (PPE). This procedure also defines roles and responsibilities to ensure PPE is properly selected, worn, and maintained to protect workers from workplace hazards.

ROLES AND RESPONSIBILITIES

Senior Management is responsible for:

1. Reviewing the PPE Policy and PPE Procedure at minimum annually.
2. Ensuring appropriate PPE is provided to workers.
3. Appointing competent supervisors to monitor workplace PPE compliance.
4. Enforcing the disciplinary program for non-compliance.
5. Providing necessary training and instruction for required PPE.
6. Ensuring PPE requirements are documented and communicated.
7. Wearing required PPE during site visits.

Supervisors are responsible for:

1. Monitoring the workplace to ensure required PPE is worn.
2. Ensuring PPE inspections are completed in accordance with this procedure.
3. Notifying Senior Management of non-compliance and enforce progressive discipline.
4. Ensuring workers receive appropriate PPE training.
5. Removing defective or non-compliant PPE from service.
6. Wearing required PPE.

The HSE Department is responsible for:

1. Maintaining PPE training records.
2. Maintaining PPE inspection and maintenance records.
3. Conducting random site inspections to verify compliance.
4. Documenting PPE requirements for specific tasks and activities.
5. Wearing required PPE during site visits.
6. Reviewing manufacturer and legislative inspection requirements.
7. Scheduling required PPE maintenance.

Workers are responsible for:

1. Wearing required PPE at all times.
2. Completing required PPE inspections and documentation.
3. Reporting PPE defects immediately to their Supervisor.
    1.1 Attending required training sessions.
4. Maintaining PPE according to manufacturer and legislative requirements.

Subcontractors are responsible for:

1. Wearing PPE in accordance with company requirements and task-specific policies.
2. Ensuring PPE is inspected and maintained per manufacturer and legislative requirements.

Visitors are responsible for:

1. Wearing required PPE at all times while on site

SELECTION AND PURCHASING CRITERIA

When selecting PPE for a task, the following factors are considered:

1. Applicable legal requirements.
2. Current CSA standards and industry best practices.
3. Safety Data Sheets (SDS).
4. Type and nature of hazard.
5. Manufacturer specifications and operator manuals.
6. Previous incidents or injuries.
7. Industrial hygiene reports.
8. Duration of exposure.
9. Likely degree of contact with the hazard.
10. Human factors (comfort, fit, usability).
11. Environmental and workplace conditions.

The team developing the Hazard Assessment or Safe Work Procedure is responsible for determining PPE requirements using the above criteria. Once PPE requirements are determined as part of the hazard assessment process, they are purchased according to the criteria and standards set out in the table below. Should a Supervisor or other member of the team have a question or are unsure if PPE is meeting the standard, they are to contact the HSE Department for further guidance.

PPE requirements are documented within the following documents:

1. Daily Hazard Assessment Forms.
2. Safe Work Procedures.
3. Job Hazard Assessments.
4. Working at Heights Plans

PPE PROVISION

Personal Protection Equipment (PPE) is provided by the company and is readily available to workers required to wear it. Employees are issued required PPE on their first day of work or prior to mobilizing to a job site. This is done during the company orientation. Multiple sizing options are available to ensure proper fit. If sizing is not available, an order is placed by the HSE department or hiring manager to ensure the PPE is the appropriate size.

For unionized personnel, Personal Protective Equipment provision shall comply with the applicable Collective Agreement. Where the Collective Agreement specifies that certain PPE must be supplied by the worker, those requirements will apply. PPE not identified in the Collective Agreement will be supplied by the company. This will be done to ensure that when a project commences, standard PPE required by the hazard assessment is sent to site in the trailer.

As the project progresses, regular inspections take place such as weekly supervisor inspections, HSE inspections and JHSC inspections. These inspections also review PPE stock levels on site. Should additional supplies be required, the site supervisor is informed and an order is placed to have the items delivered to site. PPE is made readily available on site in the main trailer which all employees have access to.

If an employee requires specialized PPE such as a harness and lanyard, these items will be issued to the worker by the HSE Department.

PPE Inspection and Maintenance

PPE inspection and maintenance requirements are reviewed by the HSE Department by reviewing manufacturer manuals, legislation and standards. If a new type of PPE is required that is not covered in this procedure, the HSE Department will review the requirements, establish the frequency, if any forms need to be used to document the inspection/maintenance, training that may be required and if further PPE guidelines need to be developed. The inspection and maintenance requirements for the PPE currently used at the company are outlined in the table below.

The following specific steps are in place to inspect PPE:

Step 1 The HSE Department reviews all manufacturer manuals and legislation regarding PPE to identify what must be inspected and frequencies.

Step 2 Inspection forms are developed based on the recommendations from the manufacturer. The inspection form is available electronically on Corfix.

Step 3 Inspection requirements are communicated to the users. This includes during the safety orientation, via toolbox talk or company memo. If additional training is required, this will be organized by the HSE Department.

Step 4 Users follow the inspection checklist and training they have received to perform the inspection on the PPE.

Step 5 If any deficiencies are found, the PPE is taken out of service by using a red tag and supervisor is advised immediately

Further details on the company's inspection process are outlined in the Inspection Procedure (as part of Element 9).

The following specific steps are in place to maintain PPE:

Step 1 The HSE Department review the manufacturer's manuals and legislative requirements for maintenance of PPE. This includes reviewing what items need maintenance, maintenance frequencies and what must be included as part of the maintenance (including developing any required checklists).

Step 2 PPE items that require maintenance (such as fall protection equipment), are added to an inventory list and included in the maintenance schedule. Refer to the Preventative Maintenance Procedure (Element 7).

STANDARD PPE REQUIREMENTS

The following table outlines the standard PPE requirements:

PPE Category	Type(s)	Selection Criteria	Training	Inspection	Maintenance / Replacement
Head Protection	Hard Hat	Must meet Class E Type I or II under CSA Z94.1 – Industrial Protective Headwear	Provided during company orientation	Daily pre-use inspection documented on Daily Hazard Assessment. Check for cracks, dents, wear, deterioration, damaged suspension.	Replace at minimum every 5 years or sooner if impacted, cracked, visibly damaged, degraded (brittle, faded, chalky), or suspension failure occurs.
Hand Protection	Leather gloves Neoprene gloves Nitrile-coated gloves Cloth gloves	Proper sizing; SDS review; hazard type	Provided during orientation and task-specific training	Daily pre-use inspection documented on Daily Hazard Assessment	Replace if damaged, torn, punctured, or otherwise compromised.
High Visibility & Body Protection	Rain gear with reflective striping High-visibility vest or jacket	Must meet CSA Z96 – High Visibility Safety Apparel. Minimum Class 2 when working around live traffic. Client-specific requirements followed where applicable.	Orientation and task-specific training	Daily pre-use inspection documented on Daily Hazard Assessment	Replace when faded, torn, permanently soiled, or reflective material deteriorates.
Foot Protection	CSA Grade 1 safety boots (minimum 6 inches above heel)	Must comply with CSA Z195 – Protective Footwear	Orientation or job-specific training	Daily pre-use inspection documented on Daily Hazard Assessment	Replace when worn or compromised (treads worn, toe cap exposed/damaged, waterproofing failure, puncture plate compromised).
Hearing Protection	Ear muffs Disposable ear plugs	Selected in accordance with CSA Z94.2 and hazard assessment (noise type, intensity, exposure duration)	Orientation or job-specific training	Daily pre-use inspection documented on Daily Hazard Assessment	Disposable plugs discarded after use. Damaged earmuffs replaced.
Eye Protection	Safety glasses Face shields	Must meet CSA Z94.3 – Eye and Face Protectors (Class 1)	Orientation or job-specific training	Daily pre-use inspection documented on Daily Hazard Assessment	Replace if scratched, cracked, fogged, bent, or if protective coatings fail.

PPE Category	Type(s)	Selection Criteria	Training	Inspection	Maintenance / Replacement
Fall Protection PPE	Full body harnesses Lanyards Energy absorbers	Must comply with applicable CSA Z259 standards. Selected based on hazard assessment and fall protection plan.	CPO-approved Working at Heights training required	Daily pre-use inspection documented on FORM C1003. Annual inspection by competent person.	Defective equipment removed from service immediately. Failed annual inspections require disposal or manufacturer repair.
Respiratory Protection	N95 respirator (NIOSH approved)	Required when exposed to silica dust (e.g., cutting concrete)	Orientation or job-specific training	Daily user inspection documented on Daily Hazard Assessment	Dispose when soiled, damaged, or breathing resistance increases.

5.1 PPE Visual Reference Table

PPE Category	Image	Description
Head Protection		CSA-approved industrial hard hat used to protect against impact and penetration hazards.
Hand Protection		Task-specific gloves selected based on hazard type (abrasion, chemical, oil exposure, etc.).
High Visibility & Body Protection		CSA-compliant high-visibility apparel used to increase worker visibility.
Foot Protection		CSA Grade 1 protective footwear with toe protection and puncture resistance.

PPE Category	Image	Description
Hearing Protection		Ear muffs or ear plugs used to reduce noise exposure.
Eye Protection		CSA-approved eye and face protection against impact and debris.
Fall Protection		Full body harness and connecting devices used for fall arrest or restraint.
Respiratory Protection		CSA-approved respirator used to protect against airborne contaminants such as silica dust.

PPE GUIDELINES

Written guidelines exist for specialized PPE:

1. Fall Protection PPE Guidelines.
2. Half-Mask and Full-Face Respirators.

Guidelines for the proper fit, care and use of PPE are developed following this process:

Step 1 PPE requirements are identified as part of the hazard assessment.
Step 2 PPE manufacturer manuals and legislation are reviewed by the HSE Department. The review will consist of identifying any care instructions, maintenance and inspection requirements, and limitations of the PPE.
Step 3 Input on the guidelines will be obtained from the JHSC.

Should new PPE be introduced, changes will be implemented as per the Management of Change Procedure (Element 14.2).

ADHERENCES TO PPE REQUIREMENTS

Supervisors are responsible for ensuring required PPE is worn by all personnel including workers, subcontractors, management, suppliers, and visitors. Compliance is verified through:

1. Daily Hazard Assessments.

2. Site orientation.
3. Supervisor inspections.
4. Random inspections by the HSE Department.

Violations of PPE requirements will result in disciplinary action in accordance with company policy.

REFERENCES

A-013 Pre-Use Fall Protection PPE Inspection
A-001 Daily Field Level Hazard Assessment

REVISION HISTORY

REVISION	DESCRIPTION	DATE	APPROVAL
1	Procedure created	Feb 1, 2026	Douglas Drevniok
2	Procedure updated to address COR internal audit comments: • Clarified how guidelines are developed for proper fit, care and use of PPE • Clarified how PPE is made available and provided • Clarified how PPE is inspected and maintained	Aug 5, 2026	Douglas Drevniok

PREVENTATIVE MAINTENANCE PROCEDURE

PURPOSE

The purpose of this procedure is to define how Frecon maintains its Preventative Maintenance Program. This program establishes maintenance requirements, scheduling processes, and procedures for identifying and removing defective tools, equipment, vehicles, and machinery from service.

SCOPE

This Preventative Maintenance Program applies to all company-owned or leased tools, equipment, vehicles, machinery, and facilities requiring maintenance. It applies to all company personnel, including management, supervisors, workers, and maintenance staff, as well as subcontractors bringing equipment onto company worksites. This procedure applies to all company operations, including offices, yards, and project sites.

ROLES AND RESPONSIBILITY

Senior Management is responsible for:

1. Ensure that all tools, equipment, vehicles, and machinery provided to personnel are maintained in good working conditions and serviced in accordance with manufacturer's recommendations and applicable legislation.
2. Ensure a preventative maintenance schedule is established and that adequate resources are assigned to implement and maintain the program.

HSE Department is responsible for:

1. Ensure that copies of all operator and maintenance manuals are kept on file.
2. Review the preventative maintenance schedule regularly.

Maintenance Personnel are responsible for:

1. Issue asset numbers and maintain the inventory list
2. Ensure vehicles, equipment, machinery, and tools are serviced according to the maintenance schedule.
3. Track inventory items.
4. Ensure defective items are not sent to site.

Supervisors are responsible for:

1. Ensure workers conduct pre-use inspections of tools, equipment, vehicles, and machinery.
2. Ensure that any defective or damaged equipment is immediately removed from service and tagged using the company’s red tag system.
3. Report equipment requiring repair or maintenance.

4. Ensure only approved and properly maintained tools, equipment, vehicles, and machinery are used on site.
5. Coordinate with Maintenance Personnel to return defective or overdue equipment for servicing or repair.
6. Verify that rental equipment arriving on site is in safe working condition and that required documentation or certifications are available where applicable.

Workers are responsible for:

1. Report any defects or damage on tools, equipment, vehicles, or machinery.
2. Notify their supervisor immediately if tools, equipment, vehicles, or machinery need to be taken out of service.

Subcontractors are responsible for:

1. Maintain any tools, equipment, vehicles, or machinery brought onto company sites in accordance with legislative requirements and manufacturer recommendations.
2. Provide documentation to the company when requested, demonstrating that maintenance and inspections have been completed.

PREVENTATIVE MAINTENANCE PROCESS AND REQUIREMENTS

Inventory List

An inventory list of all assets requiring maintenance that are owned, rented or leased by the company is maintained. The list is determined according to these criteria:

- By reviewing the manufacturer's manual. This review is conducted by Maintenance Personnel and the HSE Department. If the item has specific requirements listed for maintenance in the manual, the item is added to the inventory list.
- Review of legislation – this includes reviewing any maintenance requirements that apply to assets such as vehicles, heavy equipment, facilities and tools.

The following items are not included on the inventory list:

- Items that are disposable after use or single use items.
- Items that, when broken, cannot be repaired (such as a hand tool).
- Any items that do not have a maintenance section listed in their manual. For example, only a daily pre-use inspection is required or basic cleaning.

A review was completed of all items that were found on site and in storage at the shop.

Items are either issued an asset tag or tracked using a unique serial number. This process is managed by the Maintenance Personnel. A log has been created to record asset numbers for all items requiring maintenance. When new items are purchased, the inventory list will be updated and an asset tag will be issued.

Subcontractors bringing vehicles, equipment, tools, or machinery onto site must ensure maintenance is performed on their assets in accordance with contractual requirements. Random site inspections may be conducted to verify that maintenance records are available and that equipment is being serviced as required.

For new assets that are purchased, the management of change procedure will be followed prior to introducing the new item.

Maintenance Schedule

A maintenance schedule (spreadsheet) is maintained to track tools, equipment, vehicles, and machinery requiring servicing. The schedule indicates when items are due for their next service. The Health and Safety team and yard personnel review this schedule regularly to ensure servicing is completed on or before the due date.

Any new equipment or assets purchased are reviewed through the company's Management of Change process. This includes the Health and Safety team and maintenance personnel reviewing the maintenance manual and establishing a maintenance schedule for the new item.

Determining Maintenance Requirements

Operator manuals are kept readily available in digital or hard copy format. These manuals, along with legislated requirements, are reviewed to determine maintenance requirements for each tool, piece of equipment, vehicle, and machine. Checklists have been developed where required to demonstrate that equipment is serviced according to manufacturer or legislative requirements.

Any equipment rated over 10 HP is inspected in accordance with Construction Regulations, before being placed into service and at least annually thereafter.

The table included in this procedure summarizes the preventative maintenance requirements established through legislation or manufacturer recommendations.

MAINTENANCE COMPLETED IN-HOUSE

For maintenance performed in-house, checklists have been developed based on manufacturer recommendations. These checklists document:

1. Maintenance completed.
2. Any repairs performed.
3. The person completing the work.
4. Additional details related to the service performed.

MAINTENANCE COMPLETED BY EXTERNAL PARTIES

When in-house expertise or qualifications are not available, tools, vehicles, equipment, or machinery will be returned to the supplier/manufacturer or repaired by a qualified third-party company.

Records of any maintenance performed will be requested and retained on file.

RENTAL EQUIPMENT

Equipment, tools, machinery, or vehicles that are rented will be inspected upon delivery or pick-up to ensure they:

1. Are in serviceable condition.
2. Include manufacturer manuals.
3. Have maintenance records available.
4. Have up-to-date certifications where applicable.

If defects or issues are identified, the supervisor will contact the service provider immediately.

QUALIFICATIONS

Only qualified personnel may perform maintenance on tools, vehicles, equipment, or machinery.

Maintenance on vehicles must be performed by licensed mechanics.

For machinery and equipment, all servicing is currently outsourced to qualified third-party companies authorized to repair and maintain the specific makes and models of equipment. This includes the rental provider or the original supplier.

The following process is in place to determine the competencies required:

Step 1 Review the manufacturer manuals and legislation to determine if any competencies or credentials are outlined.

Step 2 If specific competencies such as licensed mechanics or technical expertise are required from the manufacturer, review which external companies can provide these services. The review includes ensuring that the company is reputable, is an authorized dealer of the equipment or certified by the manufacturer to conduct any repairs or maintenance. In the case of vehicles/trailers, the shop must be certified by MTO to perform regulatory inspections and maintenance.

For items that do not require an authorized dealer or certified mechanic to perform maintenance, the maintenance will be completed in house.

The following process is in place to determine the competencies of in-house maintenance personnel:

Step 1 Review the inventory items that will require in-house maintenance. Review the maintenance manuals for these items to determine what specific maintenance needs to be performed.

Step 2 Define the skills, knowledge and training that will be required to perform maintenance on these items based on this review.

Step 3 Update any job descriptions as required with the competencies that are required. Note: for additional information on how competencies are identified and assessed refer to the Training Procedure (as part of Element 8.1).

Step 4 Ensure that new employees are provided with shadow training from experienced maintenance personnel.

Step 5 Once shadow training is completed, complete a competency assessment for the new employee. This includes observing them performing maintenance tasks to ensure all maintenance outlined in the manual was completed, that they are familiar with the maintenance schedule, the item was put back into service correctly, the correct tools were used to complete the maintenance/repair and that the required documentation was completed to log the maintenance. Based on the assessment, review if further training or coaching is required to deem them competent.

PROCEDURE FOR REMOVING OVERDUE OR DEFECTIVE ITEMS

Any tools, equipment, vehicles, or machinery found to be defective must be reported immediately to the supervisor and removed from service. A red-tag system is used to identify defective equipment and indicate the nature of the defect. Defective items will either be returned to the main office or sent directly to a third party for repair. Senior Management will determine whether the item should be repaired or discarded. If equipment becomes overdue for service, a red tag will be placed on the item until maintenance can be completed by a qualified individual. The HSE Department, Supervisors, and Maintenance Personnel monitor the inventory list to ensure items approaching their service date are identified and scheduled for maintenance. If an item is already issued to a job site, the Supervisor will be notified so the equipment can be tagged out. Maintenance Personnel will then coordinate the return of the item for servicing.

SCHEDULING MAINTENANCE

The HSE Department reviews the Preventative Maintenance Schedule monthly to monitor equipment due dates. For maintenance completed internally:

1. The designated qualified operator will be notified prior to the service due date.
2. A maintenance form will be provided to record the work performed.

If issues are identified that require third-party servicing, management will coordinate the external maintenance. For outsourced maintenance:

1. Maintenance Personnel will arrange for the equipment to be transported or picked up for servicing.

Once maintenance is completed, the maintenance schedule will be updated with the next service due date.

MAINTENANCE RECORDS

Maintenance records are stored either digitally on the company drive or as hard copies in the office. Records include completed maintenance checklists and documentation of any corrective actions taken. The preventative maintenance schedule is currently maintained

using an Excel spreadsheet stored on the company drive. Internal maintenance must be recorded using form FORM-S1029 – Asset Maintenance and Repair Log.

For outsourced maintenance, a service report will be obtained from the service technician or company and retained on file.

For any corrective actions that arise from inspections, these are identified, recorded and retained as per the Inspection Procedure (as part of Element 9). Inspections completed in Corfix are retained on file in this system along with any additional action items that were taken as a result of the inspection. Paper copy inspection reports are uploaded to Corfix or retained on file at the office in a locked filing cabinet.

Below is a summary of the tools, equipment, machinery and vehicles that are owned or leased by the company and require maintenance:

Item	**Frequency/Scheduling**	**Person performing maintenance**
Trailers	Annual CVOR Inspection	Qualified Mechanic (outsourced)
Company pick-up trucks/vehicles	Every 12,000 kms oil change or as recommended by manufacturer CVOR Annual inspection Annual emissions test Repairs when needed	Qualified Mechanic (outsourced)
Facilities	Life safety systems inspections (emergency lighting, communication system, alarms, sprinkler)	Coordinated by building owner and outsourced to qualified third party
Forklift	Annual lifting device inspection/maintenance Repairs as needed	Rental – , Outsourced to qualified forklift servicing company coordinated by Maintenance Personnel
Telehandler/Skid Steer	Annual inspection/maintenance Repairs as needed	Rental – , Outsourced to qualified forklift servicing company coordinated by Maintenance Personnel
Generator	Maintenance as per Manual at every 500 hours or at a minimum of once per year	Rental – outsourced coordinated by Maintenance Personnel Competent operator in house or qualified third party
Power Actuated Tools	Maintenance as per Manual Pre/post use clean and lubricate	Rental – Outsourced to qualified servicing company coordinated by Maintenance Personnel or competent operator in-house
Propane Heaters	Maintenance as per Manufacturer	Rental – Outsourced to qualified servicing company coordinated by Maintenance Personnel or

Item	Frequency/Scheduling	Person performing maintenance
		competent operator in-house
Compressors	As per Manufacturer Pre-use check oil levels, drain condensate, check air filters, check for leaks When used regularly: clean/replace filters, inspect piping for dust buildup Annually: change lubricant, check safety valve, and	Rental – Outsourced to qualified servicing company coordinated by Maintenance Personnel or competent operator in-house
Scaffolding	Pre-use and post-use inspections for damage, loose components Structural integrity checks on metal parts for rust, cracked frames, defective welds and wood parts for splits, rot and Lubricate moving parts Remove materials like concrete, stucco and paint	Rental – Outsourced to qualified servicing company coordinated by Maintenance Personnel or competent operator in house.

REFERENCES

S1029 Asset Maintenance and Repair Log

Preventative Maintenance Schedule (excel spreadsheet)

REVISION HISTORY

Revision	Description	Date	Approval
1	Developed procedure.	Feb 1, 2025	Douglas Drevniok
2	Updated the procedure to address comments from the COR internal audit: • Clarified how the inventory list is established • Clarified how corrective action items from inspections are addressed • Clarified how competencies are determined • Added references section to procedure to list forms and excel spreadsheet for maintenance	Aug 5, 2026	Douglas Drevniok

PURPOSE

The purpose of this procedure is to outline Frecon's training program and describe how training requirements are identified, delivered, documented, and monitored to ensure workers are competent to safely perform their assigned duties.

SCOPE

This procedure applies to all Frecon employees, supervisors, subcontractors, Human Resources, the HSE Department, and Senior Management. It outlines how training needs are identified, how workers are onboarded, and how training records are maintained.

ROLES AND RESPONSIBILITIES

Senior Management is responsible for:

1. Ensuring employees receive the appropriate level of training before commencing work.
2. Allocating appropriate resources to monitor and manage the training program.
3. Approving and funding required training programs.
4. Ensuring only competent and trained workers are assigned to perform work activities.

The HSE Department is responsible for:

1. Developing and delivering training programs where qualified to do so.
2. Maintaining the training database and training records.
3. Coordinating internal and external training sessions.
4. Monitoring training expiry dates and scheduling refresher training as required.
5. Ensuring new hire orientation packages are provided to employees.
6. Maintaining the company training matrix and employee training tracker.

HR Department is responsible for:

1. Informing the HSE Department of new hires.
2. Developing and maintaining job descriptions for company positions.
3. Updating job descriptions when job roles or requirements change.

Supervisors are responsible for:

1. Attending required training programs.
2. Ensuring only competent and trained workers perform work activities on site.
3. Maintaining training documentation on site when required.
4. Notifying the HSE Department if workers require additional training.
5. Reviewing training credentials for subcontractors during site orientation.

Workers are responsible for:

1. Participating in required training programs.
2. Providing training certificates to the company upon hire when applicable.
3. Only performing work that they are trained and qualified to perform.

Subcontractors are responsible for:

1. Submitting proof of training for all workers sent to site.
2. Attending site-specific orientation training as required.

IDENTIFICATION OF COMPETENCIES

Frecon maintains job descriptions that outline the competencies required for each position. These descriptions define the knowledge, skills, experience, and qualifications required for each role. Job descriptions are developed and maintained by the HR Department in collaboration with Department Managers. When a new role is created or responsibilities change, job descriptions are reviewed and updated accordingly.

When developing or reviewing job descriptions, the following process is followed:

Step 1 Management identifies all the different roles within the company. The HR Department will update the organizational chart to map out any new roles for the company.

Step 2 For each role, determine what tasks need to be performed. As part of this review, factors such as the following are considered:

- The physical demands of the job – sitting/standing, lifting/carrying, fine motor skills, bending, reaching, climbing, and frequency/repetition of tasks.
- Work environments and working conditions – such as working outdoors, in hot or cold environments, working away from home etc.,
- Tools and equipment that are used.
- Review hazard assessments relating to the role. This review will help identify what skills and knowledge will be required to perform the tasks. The knowledge and skills required will be recorded on the job description.

Step 3 Management will determine what level of experience is required. This will be determined by reviewing if this is an entry level role, complexity of the role and responsibilities.

Step 4 The HSE Department in conjunction with management and the HR Department will review legislated, or client requirements to determine if any certifications or professional designations are required for the role. This could include certifications with the college of trades, engineering association, accounting designations etc.,

Job descriptions are maintained on the company drive and are developed for both field and office staff.

Competencies will then be assessed by the hiring manager. This includes completing an assessment prior to hire (such as verifying professional credentials or verifying that the worker is in good standing with the college of trades). It can also include checking references to validate experience or skills. Assessments are also performed during the probation period of the worker which include reviewing completed work, performing site observations with the worker or conducting practical evaluations.

Note: training requirements are identified as part of the training need analysis described below in this procedure.

TRAINER COMPETENCY

Frecon utilizes both internal and external training providers. Where internal training is delivered, management ensures that the individual providing the training has the appropriate knowledge, experience, and competencies to deliver the training effectively. Currently, company orientation is delivered internally by an employee who has received shadow training from the HSE Department. Where internal trainers do not possess the required qualifications, training is outsourced to qualified third-party providers. Recognized training partners such as union training centers and the Infrastructure Health and Safety Association (IHSA) are preferred providers. When training is obtained from other providers, trainer qualifications may be requested to ensure they are competent to deliver the training. Training content may also be reviewed prior to scheduling to ensure it meets company requirements. This may include reviewing course outlines, learning objectives, or training agendas.

Training may be delivered through various formats including:

1. In-person classroom training
2. Online training modules
3. Blended learning formats
4. Shadow training
5. Practical or hands-on training

The following process is in place to ensure in-house trainers are competent:

Step 1 Competencies required are outlined in the job descriptions and within this procedure for the in-house company orientation. This includes following the steps that are listed under 'identification of competencies' in this procedure.

Step 2 The employee will attend a session delivered by another experienced/qualified team member.

Step 3 Assess the competency of the trainer. This will include reviewing to ensure that any required credentials are up to date and that the employee meets the criteria listed below. The employee must be able to demonstrate that they can provide a clear orientation, that all required materials are covered, that the appropriate checklists are being used and that the orientation documentation is uploaded to the company's platform.

Competencies for delivering the in-house safety orientation:

1. Knowledge of the Occupational Health and Safety Act and applicable regulations.
2. Understands Frecon's company rules and safe work procedures.
3. Communication skills – able to communicate verbally in English.
4. Recordkeeping – able to use digital platforms (apps or computer) or scan in completed training records.
5. Understands emergency procedures specific to the site.
6. Knowledge on hazards and any site specific control measures.

ASSESSING TRAINING NEEDS

Training needs and required training frequencies may be identified through several sources, including:

1. Legislated requirements
2. Industry best practices (such as CSA standards)
3. Feedback from the Joint Health and Safety Committee (JHSC)
4. Feedback from Management Review meetings
5. Job hazard assessments
6. Incident investigation results

Frecon maintains a training matrix that identifies required training for various roles within the company. This matrix was developed by Senior Management and the HSE Department based on the considerations listed above. When a new worker is hired, valid training certificates are reviewed during orientation, and copies are retained on file. If additional training is required, the HSE Department will coordinate the necessary training. The training matrix is regularly reviewed to monitor expiration dates and identify new training requirements. When determining training needs, the following factors may also be considered:

1. Worker responsibilities and job duties
2. Physical or cognitive abilities
3. Language and literacy levels

During the hiring process or at the start of employment, employees may confidentially inform Human Resources or management if accommodations are required. If training is available in an employee's preferred language, efforts will be made to schedule appropriate training. Employees must possess basic English language skills as a condition of employment. Any accommodation requests will be documented in the employee's file. Because supervisors have additional safety responsibilities, they are required to complete additional training including:

1. 5 Step Supervisor Training
2. Respiratory Protection
3. Due Diligence
4. Incident Investigation
5. Confined Space Awareness
6. Scaffold Safety
7. Lockout/Tagout
8. Hot Work

Workers also receive training on the organization's OHSMS during company orientation, including:

1. Purpose of the OHSMS
2. Roles, responsibilities, and worker rights
3. Importance of following procedures and safety requirements

4. Potential consequences of non-compliance
5. Importance of worker participation in the OHSMS

Workers are not permitted to perform work they are not qualified or trained to perform. Management ensures only trained and competent workers are scheduled to perform work activities. The Management Team and Site Supervisors have access to the employee training matrix in Corfix to verify training requirements. If a worker is promoted, changes roles, or is assigned additional duties, the HSE Department will review training requirements and coordinate additional training if necessary.

COMPANY ORIENTATION PROGRAM

Frecon maintains a standardized company orientation program for all employees. Orientation is mandatory and is conducted at the office on an employee's first day before work begins. Orientation is required for:

1. New employees
2. Returning seasonal workers
3. Young workers
4. Workers returning from extended absences

The orientation program includes topics such as:

a) Health and Safety Policy	b) Occupational Health and Safety Act and Legislation
c) Worker Responsibilities and Rights	d) Work Refusal and Reprisals
e) JHSC and Health and Safety Representative	f) Hazard and Risk Assessments
g) Incident Reporting and Investigation	h) First Aid
i) Return to Work Program	j) Emergency Evacuation Procedures
k) Fire Extinguisher training	l) Mandatory PPE requirements and inspections
m) Designated Substances	n) Workplace Violence and harassment training including reporting and investigations
o) Review of Employee Handbook	p) Disciplinary Program and company safety rules
q) Smoking, Hygiene, Washroom, Eating and Drinking	r) Additional Training Requirements

Employees also receive an orientation package that includes the employee handbook and relevant health and safety policies. Employees must complete required online training modules before performing tasks related to their role.

SITE-SPECIFIC ORIENTATIONS

Site-specific orientations are conducted for all employees, subcontractors, and visitors attending a project site. Supervisors are responsible for delivering site-specific orientations and communicating project safety rules, hazards, and requirements. Orientation completion is documented in Corfix and participants sign an orientation record. Once completed, workers may receive a hard hat sticker indicating that the orientation has been completed.

TRAINING MANAGEMENT AND ADMINISTRATION

The HSE Department is primarily responsible for monitoring and administering the training program. Training records are tracked through Corfix and alerts are configured to notify the Health and Safety Team when training is approaching expiration. When training is due, the HSE Department will arrange online training assignments or schedule workers to attend external training programs. Senior Management will be notified if the following situations occur:

1. Workers unwilling or unable to participate in required training
2. Expired or overdue training certificates
3. Instructor or training provider unavailability

EVALUATION OF LEARNING

Training effectiveness may be evaluated through written tests, quizzes, or practical assessments. Most third-party training programs include a final test or knowledge assessment. Online training modules also include quizzes that must be completed to verify learning.

Interviews and observations may also be conducted to verify learning. Should any worker not successfully pass a written test or practical assessment, the HSE Department will coordinate further follow-up training with the employee. The employee will then be re-assessed after re-training.

DOCUMENTATION AND RECORDS

Training and orientation records are maintained in Corfix by the HSE Department. Training certificates are uploaded to the employee's profile once refresher training is completed. Previous versions of certificates are retained and archived within the employee's profile for reference.

REVISION HISTORY

Revision	Description	Date	Approval
1	Training Procedure created.	Feb 1, 2026	Douglas Drevniok

Revision	Description	Date	Approval
2	Updated procedure to address COR internal audit comments: • Clarified process on how competencies are identified • Clarified process for ensuring in-house trainers are competent • Clarified the learning evaluation process	Aug 5, 2026	Douglas Drevniok

COMMUNICATION PROCEDURE

PURPOSE

The purpose of this procedure is to define how Frecon communicates information related to its Occupational Health and Safety Management System (OHSMS) and safety program to all workplace parties, and how workers are provided opportunities to participate, provide feedback, and raise safety concerns.

SCOPE

This procedure applies to all Frecon employees, supervisors, subcontractors, the Health and Safety Team, and Senior Management. It outlines the methods used to communicate health and safety information, updates to the OHSMS, hazards, incidents, and other safety-related matters both internally and externally.

ROLES AND RESPONSIBILITY

Senior Management is responsible for:

1. Ensuring the necessary tools, equipment, resources, and technology are provided to support effective communication between workplace parties.
2. Promoting open communication and worker participation in health and safety matters.
3. Reviewing this procedure annually as part of the Management Review process.
4. Attending annual safety meetings, delivering key safety messages, and encouraging worker engagement and feedback.

HSE Department is responsible for:

1. Supporting Senior Management in communicating OHSMS updates and safety information to the organization.
2. Scheduling company-wide safety meetings and ensuring meeting agendas, minutes, and attendance records are maintained.
3. Assisting Supervisors in providing relevant toolbox talk topics and safety communication materials.
4. Coordinating Joint Health and Safety Committee (JHSC) meetings and ensuring meeting minutes are recorded and distributed.
5. Maintaining records related to safety communications in accordance with company document control procedures.

Supervisors are responsible for:

1. Communicating key safety messages, updates, and hazard information to workers and subcontractors on site.
2. Ensuring weekly toolbox talks are completed and documented.
3. Participating in company-wide safety meetings and communicating relevant information to their crews.
4. Encouraging workers to raise safety concerns and ensuring those concerns are reported and addressed.

Workers are responsible for:

1. Participating in company-wide health and safety meetings and toolbox talks.
2. Providing feedback on safety matters and communicating hazards or concerns to their Supervisor.
3. Following safety instructions and participating in discussions related to workplace safety.

COMMUNICATION CONSIDERATION

Frecon uses several communication channels to communicate updates or changes to the OHSMS with workplace parties. When communicating safety-related information, the company considers factors that may affect the effectiveness of communication, including:

1. Languages spoken by employees determine whether translators or interpreters may be required.
2. Literacy levels of employees to determine whether communication should be provided verbally, in writing, or supported with visual aids.
3. Physical or cognitive conditions that may require accommodation (for example poor eyesight, dyslexia, or other learning considerations).

Accommodation requirements are communicated to the Human Resources (HR) team. HR or the HSE Department will coordinate appropriate accommodations to ensure employees can effectively receive safety information. These needs are typically identified during the hiring and onboarding process; however, employees may request accommodations at any time by informing management.

COMPANY-WIDE SAFETY MEETINGS

Frecon conducts company-wide safety meetings at a minimum annually to communicate important health and safety information and gather workers' feedback.

The company has three office locations: Kingston, Pembroke, Russell

Separate meetings will be scheduled throughout the year by the HSE Department in collaboration with Senior Management. Meetings are primarily conducted in person; however, remote attendance options may be provided when required. The President will attend and participate in presenting key topics. The HSE Department is responsible for preparing the meeting agenda, recording meeting minutes, and documenting attendance.

Typical meeting topics may include:

1. OHSMS performance statistics and trends
2. Updates to procedures or policies
3. COR program updates
4. Incident trends and lessons learned
5. Changes to the safety program

WORKER INPUT INTO THE OHSMS

Workers are able to provide input into the OHSMS by some of the following processes:

1. Company-wide safety meetings: Workers are encouraged to participate by providing feedback, raising concerns, and asking questions. A question and open discussion period will be included at the end of each meeting. If a worker is not able to attend the meeting, they are able to submit any questions or feedback to their direct supervisor.
2. JHSC Recommendations – each site has a worker health and safety representative that attends JHSC meetings. As part of the health and safety representative role, the safety representative gathers feedback from other workers by asking questions and soliciting feedback during their monthly inspection. All questions or concerns are then discussed at the JHSC meetings.

TOOLBOX TALKS

Toolbox talks are delivered weekly on project sites to communicate site-specific hazards, safe work practices, and safety reminders. Supervisors are responsible for ensuring toolbox talks are conducted weekly and documented. Subcontractors are also required to complete toolbox talks.

Subcontractors may either:

1. Participate in toolbox talks delivered by Frecon, or
2. Conduct their own toolbox talks that are relevant to their work activities.

Toolbox talk topics may be selected by Supervisors or issued by the HSE Department. All toolbox talks and attendance records are documented using form A-003 and recorded in Corfix.

INTERNAL AND EXTERNAL COMMUNICATIONS

Frecon recognizes that communication related to the Occupational Health and Safety Management System (OHSMS) occurs through multiple internal and external channels. Internal communications ensure that employees are informed about hazards, incidents, safety updates, and changes to the OHSMS. External communications ensure that the company meets regulatory reporting requirements and communicates effectively with clients, regulators, and subcontractors.

The following tables summarize the types of communications, responsible parties, documentation requirements, and communication methods.

External Communications

Communication Type	Responsibility	Forms / Documentation	Communication Methods
WSIB – Reporting incidents, responding to claims, liaising with WSIB	The HSE Department	Employer Form 7	Uploading documents on WSIB online portal, e-mail, phone calls
Reporting incidents to the MLITSD, responding to MLITSD orders	The HSE Department	MLITSD order reports, incident investigation templates	Notification by phone, submission of reports by e-mail
Completing Notice of Project Forms	The HSE Department with input from PM Department	Notice of Project Form – online via the Ministry website	Posted on site
Communication with clients (reporting incidents, discussing safety during project start up)	PM Department	Meeting minutes when required	E-mail, meetings (in person or virtual)
Communicating with subcontractors	PM Department and Supervisors	Subcontractor evaluation forms	E-mail, meetings

Internal Communications

Communication Type	Responsibility	Forms / Documentation	Communication Methods
Liaising with workers on the return-to-work program	Senior Management	Modified duties offer letter, return to work program	Phone, e-mail, meetings
JHSC Meetings	The HSE Department	JHSC Meeting minutes and agendas	Meetings in person, minutes posted on H&S board, minutes distributed by e-mail
Annual Safety Meetings	The HSE Department and Senior Management	Meeting attendance form, agendas and meeting minutes	Meetings take place in person or remotely, meeting minutes distributed by e-mail or posted on notice boards
Toolbox Talks	Supervisors	Toolbox talk form	In person on sites, logged in Corfix

COMMUNICATION METHODS

Changes to the OHSMS may be communicated to workplace parties through several channels, including:

1. E-mail
2. Company newsletters
3. Health and Safety bulletin boards
4. Toolbox talks
5. Company-wide safety meetings
6. Online Teams meetings
7. Other in-person meetings

The Health and Safety Team is responsible for ensuring that communications regarding updates to the OHSMS are distributed throughout the organization and that appropriate records are maintained.

DOCUMENTATION AND RECORDS

Meeting agendas, schedules, attendance sheets, meeting minutes, and worker feedback are maintained on the company drive or within Corfix. Toolbox talk documentation and attendance records are uploaded and maintained in Corfix. Records related to safety communications are retained in accordance with the Company's Document Control and Records Management Procedures.

REFERENCES

JHSC Meeting Minutes
Company-wide safety meeting agenda and meeting minutes
A-003 Toolbox Talks

REVISION HISTORY

Revision	Description	Date	Approval
1	Communication procedure created.	Feb 1, 2026	Douglas Drevniok
2	Updated procedure following the COR internal audit feedback: • Clarified the process for input from workers • Added a references section to list all specific forms used for this element	Aug 5, 2026	Douglas Drevniok

INSPECTION PROCEDURE

PURPOSE

The purpose of this procedure is to outline how the Company implements and maintains its inspection program for workplaces, tools, equipment, vehicles, and machinery.

Inspections are a key component of the Occupational Health and Safety Management System (OHSMS). They help identify hazards, non-conformities, and equipment defects so that corrective and preventive actions can be taken in a timely manner.

SCOPE

This procedure applies to all Frecon employees, supervisors, subcontractors, and any person operating machinery or equipment on behalf of the Company.

ROLES AND RESPONSIBILITY

Senior Management is responsible for:

1. Overseeing and annually review the inspection program as part of the Management Review.
2. Ensuring adequate resources are assigned to perform inspections.
3. Ensuring inspection requirements are communicated to personnel.
4. Ensuring deficiencies identified on inspection reports are corrected in a timely manner.

The HSE Department is responsible for:

1. Performing random inspections of offices and project sites.
2. Maintaining inspection records.
3. Reviewing completed inspections to ensure action items are addressed in a timely manner.
4. Preparing inspection summaries and statistics for Management Review.
5. Notifying Senior Management of major deficiencies, required repairs, or hazards requiring escalation.

Supervisors are responsible for:

1. Completing weekly inspections of project sites.
2. Informing workers of hazards or deficiencies identified during inspections.
3. Ensuring required inspections of tools, equipment, vehicles, and machinery are completed.
4. Ensuring corrective actions from inspections are implemented promptly.

Workers

Workers are responsible for**:**

1. Completing inspections as required and document them in the appropriate forms.
2. Immediately notifying their supervisor of workplace hazards or dangerous situations identified during inspections.
3. Reporting defects in tools, equipment, vehicles, or machinery.
4. Participating in inspections when required.

Subcontractors are responsible for:

1. Inspecting their own tools, equipment, vehicles, and machinery and document inspections as required.
2. Completing workplace inspections for their work areas when required.
3. Participating in JHSC worker representative inspections when required.

INSPECTION FREQUENCIES AND REQUIREMENTS

All inspections shall be conducted in accordance with applicable legislative requirements, CSA standards, manufacturer recommendations, and industry best practices. These include, but are not limited to:

a) Ontario Construction Regulations (O. Reg. 213/91)
b) First Aid Regulation 1101
c) Industrial Establishments Regulation
d) Occupational Health and Safety Act
e) Ontario Fire Code
f) Ontario Building Code
g) CSA Standards (Forklifts and Racking)
h) Confined Space Regulations
i) Ministry of Transportation requirements
j) Manufacturer manuals and recommendations

The HSE Department reviews applicable standards and regulations to determine inspection frequency, who is responsible to conduct the inspection, and the specific criteria that must be verified during inspections. These inspection requirements have been outlined in the table below. Regulatory updates are monitored by the HSE Department and incorporated into the inspection checklists through the Management of Change process.

Workplace inspections are a requirement. The HSE Department has reviewed regulatory requirements and currently the company is required to complete weekly supervisor inspections and monthly JHSC inspections. See table below for a summary of the inspection requirements, responsibilities and forms used. The inspection checklist includes a list of items to check during the inspection which assists in identifying any potential non-conformities and corrective actions.

The workplace inspection process is as follows:

Step 1 The employee performing the inspection will review the frequency required for the inspection and ensure that the inspection is planned (such as setting up a recurring calendar schedule or picking a consistent date in the month to perform the inspections).

Step 2 Ensure that the correct team is performing the inspection. For supervisors, they are welcome to have a worker attend the inspection. For the monthly JHSC inspections, other representatives from different trades will be invited to attend when required on project sites.

Step 3 Prepare for the inspection. This includes reviewing to ensure that the employee has access to all work areas, that they have the correct PPE, and a clipboard/printed checklist or access to the digital application for logging inspections is available. The employee is to ensure that the correct form and version of the form is selected. This is also a great opportunity to review previous inspection reports to ensure that previous action items have been closed out.

Step 4 Conduct the walkthrough. This includes taking the time to observe tasks, look at storage areas, ask questions to workers or subcontractors, and identify if there are any hazards. Note: should an immediate hazard or safety concern arise, stop and ensure that the Supervisor is notified immediately.

Step 5 Document the inspection using the specific checklist outlined in the table below. This includes identifying if there are any corrective actions that are required or if any non-conformities/deficiencies were found.

Step 6 Ensure that the supervisor is notified of any inspection results that may require corrective action. Action items will be tracked to completion by the supervisor and monitored by the HSE Department.

Pre-use inspections are also a requirement of the Company's inspection program for vehicles, tools, equipment and machinery. The HSE Department has reviewed regulatory and manufacturer requirements for pre-use inspections to determine what inspections are required, the frequency and who is responsible to complete them. Any corrective actions required from a pre-use inspection of a vehicle, tool, equipment or machinery are logged on the inspection checklist.

The pre-use inspection process is as follows:

Step 1 Know what equipment, vehicles or tools you will need for the day and who the operators will be.

Step 2 Prepare for the inspection - Retrieve the checklist to conduct the pre-use inspection. Ensure that you have all the PPE required to conduct the inspection. Ensure that the person assigned to perform the inspection is qualified (such as has their training certificate to operate equipment).

Step 3 Complete the pre-use inspection by following the checklist provided. This generally includes a visual inspection to start followed by a pre-operational inspection.

Step 4 Record your inspection results on the checklist. If any deficiencies are found, make note of them on the inspection and report to your supervisor immediately.

Step 5 Ensure that a red tag is placed on any tools or equipment that are found to be defective.

The process in place to determine what must be inspected is as follows:

Step 1 Collect data. Review the list of assets (as part of Element 7 – Preventative Maintenance) and the type of workplaces that the company has (such as industrial establishments, construction sites etc.,).

Step 2 The HSE Department will review all applicable legislation and manufacturer's manuals for each item.

Step 3 Specific checklists will be developed for inspections that include a list of items/components that need to be checked as part of the inspection as per the manuals and legislation.

Step 4 The HSE Department will regularly monitor legislative updates and make any required updates to the inspection checklists as required. Should new items be purchased, the management of change process will be implemented.

In accordance with O. Reg. 213/91 Section 94, equipment rated greater than 10 horsepower shall be inspected at least annually, or more frequently as required by the manufacturer.

All corrective actions identified during inspections are documented in Corfix and tracked to completion.

INSPECTION SCHEDULE

The following outlines minimum inspection requirements. This table was developed by the HSE Department by reviewing regulatory and manufacturer requirements. Based on this review, the frequency of inspections and the person responsible for completing the inspection have been identified. Inspection responsibilities are communicated to personnel during project start up and during company orientation.

Item requiring inspection	Frequency	Responsibility	Documentation Requirements
Workplace Inspection -Construction sites	Weekly	Supervisor (or assigned competent person)	A-009Weekly Supervisor Inspection
JHSC/Safety Rep Inspection (includes offices and project sites)	Monthly	Health and Safety Worker Representative *On project sites, this may be performed by a subcontractor	A-010 Monthly H&S /JHSC Inspection F1921 Office Inspection Report

Commercial Vehicles	Daily (pre-use)	Driver	Completed in Samsara Driver App
Aerial/Scissor Lift	Daily Pre-Use Inspection	Trained Operator	A-015 Pre-Use Scissor Lift Inspection
Telehandler	Daily Pre-Use Inspection	Trained Operator	A-016 Pre-Use Telehandler Inspection
Heavy Equipment	Daily Pre-Use Inspection	Trained Operator	A-017 Heavy Equipment Checklist
Tools – general hand and power tools	Daily Pre-Use Inspection	Operator/User	Visual inspection only
First Aid Kits (including eye wash/shower stations, AED and Naloxone)	Quarterly Inspection (minimum)	Health and Safety rep, Supervisor or JHSC Rep	Inspection stickers posted on First Aid kit A012 Quarterly First Aid Inspection Report
Fire Extinguishers	Monthly	HSR, Supervisor or JHSC Rep	Tag on the fire extinguisher.
Fire Extinguishers	Annual (Maintenance/Inspection)	Performed by third party fire prevention company	Fire extinguisher is either tagged or report of annual will be submitted and retained on file
General standard PPE	Daily pre-use inspection	User	A-001 Daily Field Hazard Assessment
Fall protection PPE	Daily pre-use inspection	User	A-013 Fall Protection PPE Inspection
	Annual inspection	Competent person other than the user	A-013 Fall Protection PPE Inspection

COMMUNICATION

Inspection results shall be communicated to Senior Management and all relevant workplace parties. Results of inspections will be communicated as follows:

1. Hazards, defects, or required repairs are immediately reported to the Supervisor.
2. If unresolved, the Supervisor escalates to the HSE Department or Senior Management.
3. Imminent dangers are communicated verbally without delay.
4. Inspection findings may be shared through toolbox talks, JHSC meetings, site orientations, email, or notice boards.
5. The HSE Department reviews all inspection reports in Corfix and tracks deficiencies to completion.
6. Critical or high-risk findings are immediately communicated to Senior Management.
7. Findings are shared with subcontractors or visitors where applicable to their work activities.

WORKER PARTICIPATION

Workers participate in the inspection process in the following ways:

1. JHSC inspections are completed by a Worker Representative.
2. Workers conduct required pre-use inspections of the tools, equipment, machinery, and vehicles they operate.
3. Workers may participate in Supervisor weekly inspections when required.
4. Workers report hazards, defects, or deficiencies identified during inspections to their Supervisor.

DOCUMENTS AND RECORDS

Completed workplace inspections and inspections of machinery, tools, equipment, and vehicles shall be retained by the Company. All related documentation, including records supporting the identification of hazards, non-conformities, and corrective actions, will also be maintained on file.

Records are stored electronically in Corfix or retained as scanned copies on the company's secured drive.

REFERENCES

A-009 Weekly Supervisor Site Inspection
A-010 Monthly H&S Rep/JHSC Inspection
F1921 Office Inspection Report
A-015 Pre-use Aerial or Scissor Lift Inspection
A-016 Pre-Use Telehandler Inspection
A-014 Fall Protection PPE Inspection
A-017 Pre-use Heavy Equipment Inspection
A-001 Daily Field Hazard Assessment
A-012 Quarterly First Aid Inspection Report

REVISION HISTORY

Revision	Description	Date	Approval
1	Developed stand-alone procedure.	Feb 1, 2026	Douglas Drevniok
2	Updated procedure to address comments from the COR internal audit: • Clarified the process for performing inspections • Clarified the process for what must be inspected • Clarified the process for ensuring that legislation is met	Aug 5, 2026	Douglas Drevniok

INCIDENT INVESTIGATIONS AND REPORTING PROCEDURE

PURPOSE

The purpose of this procedure is to define the company's incident investigation process as well as define the requirements for reporting incidents both internally and externally.

ROLES AND RESPONSIBILITY

Senior Management is responsible for:

1. Review incident reports and ensure timely reporting to the appropriate authorities.
2. Ensure personnel involved in investigations are trained to perform their duties.
3. Ensure corrective and preventive actions are implemented promptly and tracked.
4. Report incidents to local authorities as required by legislation.

The HSE Department is responsible for:

1. Participate in incident investigations and ensure closure of all action items.
2. Share lessons learned through toolbox talks.
3. Ensure investigation training is assigned and completed for required personnel.

Supervisors are responsible for:

1. Report incidents to the Health and Safety team and Senior Management in line with internal requirements.
2. Complete initial reports in Corfix.
3. Notify the Health and Safety team of any additional resources needed post-incident (e.g., first aid, spill kits).
4. Participate in investigations as required.
5. Mitigate additional consequences of incidents on site.

Workers are responsible for:

1. Immediately report all incidents to their supervisor.
2. Complete necessary forms or submit documentation.
3. Provide witness statements when required.

JHSC / H&S Representative is responsible for:

1. Participate in investigations when required.
2. Review incident reports when requested.

Subcontractors are responsible for:

1. Report incidents to the Project Manager, Site Supervisor, or Senior Management.
2. Participate in investigations and identify corrective and preventive actions as needed.

DEFINITIONS

The following definitions are used throughout this procedure. Understanding these terms ensures consistent reporting, investigation, and management of incidents across all worksites.

Critical Injury - An injury that places life in jeopardy, produces unconsciousness, results in substantial blood loss, involves fracture or amputation of major limbs (excluding fingers or toes), causes major burns, or results in loss of sight in an eye.

First Aid - Emergency care provided immediately to an injured person to minimize injury and prevent further disability.

Injury only - An occurrence that results, or could have resulted, in injury, or illness.

Lost-Time Injury - A work-related injury or disease that causes the worker to be absent from work beyond the day of the incident.

Medical Attention - Treatment provided by a qualified medical practitioner or registered nurse.

Medical Aid - A workplace injury requiring treatment but not resulting in lost work time.

Near Miss - An event that could have caused harm or injury but did not.

Property Damage - Unplanned damage or destruction to company or client property.

Spills - An abnormal discharge of a substance into the environment from a structure, vehicle, or container.

INCIDENT REPORTING

External Reporting Requirements

All external reporting must comply with Sections 51–53.1 of the Occupational Health and Safety Act and O.Reg 420/21.

See below for occurrence types, required reporting, deadlines, and recipients:

Occurrence	Requirement	Timeframe	Reporter	To Whom
Fatality / Critical Injury	Notify immediately, then submit written report	Immediately/ within 48 hrs	Employer	MLITSD, JHSC, H&S Rep, Trade Union
Worker disabled / medical attention	Written report	Within 4 days	Employer	MLITSD, JHSC, H&S Rep, Trade Union

Occurrence	Requirement	Timeframe	Reporter	To Whom
Occupational Illness	Written report	Within 4 days of being advised	Employer	MLITSD, JHSC, H&S Rep, Trade Union
Project site accidents (fire, explosion, cave-in, etc.)	Written report	Within 2 days	Employer	MLITSD, JHSC, H&S Rep, Trade Union
Prescribed incidents (per O.Reg 213/91)	Written report	Within 2 days	Constructor	MLITSD, JHSC, H&S Rep, Trade Union
Section 53.1 notices	Supplemental report including engineer's opinion	Within 14 days	Employer / Engineer	MLITSD
WSIB Reporting	Notify using WSIB forms	Within 3 days	Employer (H&S Admin / VP Finance)	WSIB

Internal Reporting Requirements

All incidents, including injuries, spills, property damage, near misses, workplace violence, and harassment, must be reported immediately to the supervisor.

Upon receiving a report, supervisors must notify the Project Manager or a member of Senior Management and take any immediate actions necessary to mitigate additional consequences from the incident. This could include securing the area, evacuating personnel, or cordoning off hazardous areas. Emergency response plans have also been developed to outline any immediate steps that should be taken if an event occurs.

The Health and Safety team will then initiate the incident investigation process.

INCIDENT INVESTIGATION

Investigations will begin as soon as reasonably practicable, with the goal of completing the process within 48 hours. The investigation team will consist of the following personnel:

1. HSE Department.
2. Supervisor.
3. Worker involved.
4. H&S Worker Representative, when required.
5. Senior Management, optionally.

Results of the investigation will be documented in the A-019 Incident Investigation Report, outlining the following details:

1. The root causes.
2. Corrective and preventive actions.
3. Assigned timelines.

Investigation Steps

To ensure a thorough investigation, the following steps are followed:

1. Preserve the scene until the investigation is complete.
2. Stop any similar work that is taking place.
3. Take photographs if needed or review any video footage.
4. Preserve evidence (PPE, tools, equipment, documentation).
5. Interview witnesses.

Identifying OHS Deficiencies and Root Cause Analysis

The following process is in place to determine OHS deficiencies and root causes:

Step 1 – Gather all the evidence including

1. Reviewing documentation such as permits, inspection forms, manufacturer manuals, hazard assessments and safe work procedures.
2. Interviewing witnesses using open-ended questions and collecting a witness statement.
3. Taking photos of the area or any measurements.
4. Collecting any physical evidence such as equipment, PPE, objects or materials that were involved with the incident.
5. Performing any testing that may be required.

Step 2 – Conduct a root cause analysis. The following methodology and sample questions will be used looking at the task, materials, work environment, personnel, and management. The HSE Department is responsible for leading all investigations.

Task

To seek out possible causes resulting from the tasks performed, the investigators might ask:

- Was a safe work procedure used?
- Had conditions changed to make the normal procedure unsafe?
- Were the appropriate tools and materials available?
- Were they used?
- Were safety devices working properly?
- Was the lockout used when necessary?

An important follow-up question is "If not, why not?"

Material

To seek out possible causes resulting from the equipment and materials used, the investigators might ask:

- Was there an equipment failure?
- What caused it to fail?
- Was the machinery poorly designed?
- Was the equipment maintained as recommended by the manufacturer?
- Were hazardous products involved?
- Were they clearly identified?
- Was a less hazardous alternative product possible and available?
- Was the raw material substandard in some way?
- Should personal protective equipment (PPE) have been used?

- Was the PPE used?
- Were users of PPE properly educated and trained?

Again, each time the answer reveals an unsafe condition, the investigator must ask **why** this situation was allowed to exist.

Work Environment

The physical work environment, and especially sudden changes to that environment, are factors that need to be identified. The situation at the time of the incident is what is important, not what the "usual" conditions were. For example, investigators may want to know:

- What were the weather conditions?
- Was poor housekeeping a problem?
- Was it too hot or too cold?
- Was noise a problem?
- Was there adequate light?
- Were toxic or hazardous gases, dusts, or fumes present?
- Personnel

The physical and mental condition of those individuals directly involved in the event must be explored, as well as the psychosocial environment in which they were working. The purpose of investigating the incident is **not** to establish blame against someone, but the inquiry will not be complete unless personal characteristics or psychosocial factors are considered. Some factors will remain essentially constant while others may vary from day to day:

- Did the worker follow the safe work procedures?
- Were workers experienced in the work being done?
- Had they been adequately educated and trained?
- Can they physically do the work?
- What was the status of their health?
- Were they tired?
- Was fatigue or shiftwork an issue?
- Were they under stress (work or personal)?
- Was there pressure to complete tasks under a deadline, or to by-pass safety procedures?

Management

Management holds the legal responsibility for the safety of the workplace, and therefore, the role of supervisors and higher management and the role or presence of management systems must always be considered in an incident investigation. These factors may also be called organizational factors. Ask questions such as:

- Were safety rules or safe work procedures established, communicated to, and understood by workers involved in the incident?
- Were written procedures and orientation available?
- Were the safe work procedures being enforced?
- Was there adequate supervision?
- Were workers educated and trained to do the work?
- Had hazards and risks been previously identified and assessed?
- Had procedures been developed to eliminate the hazards or control the risks?
- Were unsafe conditions corrected?

- Was there an established program for regular maintenance of equipment, and was it being followed?
- Were regular safety inspections carried out?
- Had the condition or concern been reported beforehand?
- Was action taken?

Any deficiencies found are then logged on the incident investigation report.

Corrective and Preventative Actions

1. Once the causes of the incident are known, the corrective and preventative actions are identified. The most important final step is to come up with a set of well-considered recommendations designed to prevent recurrences of similar incidents. Recommendations should:
    - Be specific
    - Be constructive
    - Identify root causes
    - Identify contributing factors
2. The risk and probability of the incident occurring again will also be analyzed.
3. Any corrective and preventative action items are identified on the incident investigation report. The action items will be clearly written to outline the specific steps needed to action the item.
4. The actions are then assigned an owner or person responsible for implementation.
5. A due date for implementation is then assigned.
6. All action items are tracked to completion by the HSE Department.
7. The HSE Department will follow-up with the action item owners to review status of implementation.

TRAINING

The following process is in place to ensure that employees and subcontractors receive training on Frecon's incident reporting requirements:

Employees

Step 1 – New employees, when on-boarded, are brought to the office on their first day. During day 1, a safety orientation is provided which includes reviewing the process for reporting incidents, what needs to be reported and reporting timelines.

Step 2 – The safety orientation training is recorded on the orientation sign off form.

Subcontractors

Step 1 – Subcontractors will inform the site supervisor if any new workers are coming to site. The site supervisor will coordinate an orientation.

Step 2 - New subcontractors that come on site will be directed to the site trailer and a Frecon employee will provide the site-specific safety orientation. This orientation includes specific reporting requirements for the site.

Step 3 – The orientation is recorded in Corfix.

The following process is in place to ensure that employees receive training on how to investigate incidents:

Step 1 – The HSE Department and management will identify who requires the training. This is done through our training needs analysis as part of Element 8.1.

Step 2 – The HSE Department will identify what training courses are required. Training must include both internal and external reporting requirements. The training must also cover incident investigation techniques and in-house training on how to complete investigation forms.

Step 3 – The HSE Department will coordinate the training for the employee and save a copy of their training record on file.

COMMUNICATION

The results of incident investigations and lessons learned will be communicated to personnel through various methods, including:

1. Toolbox talks.
2. Safety meetings.
3. Notice board postings.
4. Training sessions.
5. Updates to Safe Job Procedures.

Senior Management will be informed of incidents and investigation outcomes verbally, via email, or during the Management Review Meeting. The Health and Safety team is responsible for ensuring that all relevant parties receive the necessary information.

MONITORING THE EFFECTIVENESS

The annual Management Review evaluates incident trends and the effectiveness of implemented corrective and preventive actions. If further actions are required, they will be documented and tracked in the Management Review action plan to ensure follow-up and completion. The following process is in place to monitor the effectiveness of preventative and corrective actions:

Step 1 – The HSE Department is to ensure that all incidents are being tracked and logged.

Step 2 – The HSE Department will review each individual incident to determine which evaluations methods will be used. Methods can include reviewing documentation, performing observations, reviewing statistics or asking questions to workers/JHSC.

Step 3 – The timeline for measuring the effectiveness of the corrective and preventative action items will be established. Action items will be given a minimum of 6 months implementation before they are evaluated.

Step 4 – A management review meeting will be held and coordinated by the HSE Department. The results of the evaluation will be discussed and documented in this meeting. If further actions are required to prevent incidents from occurring, they will be discussed at the meeting and incorporated into the management review action plan.

RECORD RETENTION

All records and supporting documentation related to incidents will be maintained indefinitely, either in hard copy or digital format. The HSE Department ensures that all incident reports and supporting evidence is collected and retained on file. Notices submitted under O.Reg 420/21 will be retained for a minimum of three (3) years.

REFERENCES

A-018 Accident/Incident Report
A-019 Incident Investigation Report

REVISION HISTORY

REVISION	DESCRIPTION	DATE	APPROVAL
1	Procedure created.	Feb 1, 2026	Douglas Drevniok
2	Updated to address the comments from the COR internal audit: • Clarified how OHS deficiencies are identified and implemented. • Clarified how training is managed for incident reporting and investigation • Clarified how evaluations of effectiveness are conducted • Added specific form references	Aug 5, 2026	Douglas Drevniok

EMERGENCY PREPAREDNESS PROCEDURE

PURPOSE

The following procedure describes how the company develops emergency response plans and ensures that the required resources and equipment are available to employees.

SCOPE

This procedure applies to all Frecon sites and offices.

ROLES AND RESPONSIBILITY

Senior Management is responsible for:

1. Ensuring the necessary resources and budget are in place for emergency response resources and maintenance of equipment.
2. Communicating any emergency situations to authorities when required.

Project Management is responsible for:

1. Providing input into the emergency response plans developed for site.
2. Sharing emergency response plans with the Client for input as required.

HSE Department is responsible for:

1. Ensuring that emergency response plans are developed for the offices and project sites and reviewed as per this procedure.
2. Ensuring that other interested parties provide input into the emergency response plans as per this procedure.
3. Ensuring that emergency equipment is being inspected and maintained.
4. Assisting with carrying out emergency response drills and ensure records of these are maintained.
5. Assigning required emergency response training to personnel including first aid training.
6. Coordinating fire extinguisher maintenance.

Supervisors are responsible for:

1. Ensuring that emergency response equipment is always readily available (relevant to the hazards and possible emergency scenarios).
2. Providing input into the emergency response plans developed for site.
3. Ensuring that emergency response plans are readily available or posted on the noticeboards.
4. Ensuring that all workers assigned responsibilities under an emergency response plan are trained and have reviewed/signed off on the emergency response plan for the site.
5. Participating in emergency response drills.
6. Reporting emergencies to management immediately.
7. Ensuring that an emergency communication system is in place and communicated to all personnel during the site-specific orientation.

Workers are responsible for:

1. Reviewing and signing any site-specific emergency response plans.
2. Performing any duties assigned in an emergency response plan.
3. Inspecting any equipment that is used for rescue as required.
4. Reporting any defects with emergency response equipment immediately to the supervisor.
5. Reporting emergencies to the supervisor immediately.

EMERGENCY PLANS AND HAZARDS

Emergency response plans are developed based on completed hazard assessments. Each project has a site-specific safety plan where a hazard assessment is conducted to identify potential hazards and emergencies that may occur on site. The Health and Safety team will review the hazard assessment and identify the potential emergency scenarios that could occur.

The Company has established emergency response plans that will minimize or prevent further injuries or occupational illnesses for the identified emergency situations. Each emergency response plan lists steps that must be followed immediately to contain the emergency or ensure that personnel are evacuated from the area immediately. Personnel involved with emergency response must follow any training they have received and follow established procedures.

Preventing or minimizing injury and occupational illness during emergency situations involves a continuous cycle of hazard identification, clear emergency planning, and proper training. The following process is in place to minimize injury:

Step 1 A hazard assessment is conducted, and potential emergency scenarios are identified. This includes assessing the level or risk (probability and severity of the emergency).

Step 2 Input is received into the plan as described above in this procedure.

Step 3 Clear procedures are developed and implemented. This includes communicating the emergency response procedures during orientation or during safety talks. Signage may also be used on site to identify emergency response resources, identify egress routes or alert workers of hazards in the area.

Step 4 Inspections are routinely performed to ensure that required emergency response plans are up to date, trained personnel are on site and required equipment is in place.

INTERESTED PARTIES INPUT

Interested parties could include internal employees or external parties (such as clients, subcontractors, government authorities). At a minimum, input into the emergency response

plan is obtained from the Health and Safety team and the project manager. Additional interested parties may be required to provide input in the following situations:

1. The client
2. Subcontractors with unique hazards and may also require their own emergency response plan.
3. Landlords or building maintenance personnel.

A hazard assessment helps identify "interested parties" (stakeholders) by pinpointing who faces safety risks, who must manage those risks, and who works near the hazard. This process highlights groups affected by potential incidents or required to follow safety controls.

The HSE Department will provide the emergency response plans that have been developed to the interested parties. The plans will be either distributed paper copy on site or e-mailed. The HSE Department will request that the plans be reviewed and updated with any input provided. Feedback will be recorded either by e-mail, on a toolbox talk form A-003 or on the on sign-off sheet of the emergency response plan. If any questions or adjustments need to be made, the HSE Department will update the plans and circulate the revised versions.

EMERGENCY RESPONSE EQUIPMENT AND RESOURCES

To identify resources for an emergency plan, the HSE Department will review the hazards and tasks outlined in the plan, list the needed staff, equipment, and supplies. Part of this process includes checking what is already in place and finding gaps through a resource assessment. Required resource types include:

a) People: Identify roles, skills, and the number of staff needed.

b) Equipment: List tools, radios, vehicles, and safety gear, fire extinguishers.

c) Supplies: Ensure required supplies are identified including first aid supplies, AED's, naloxone etc.,

d) Services: Note needs for specialized help or contractors should the skill set or equipment not be available in-house. Such as confined space rescue, high angle rescue, water rescue etc.

Emergency response equipment will be maintained as per the manufacturer's recommendations and any legislative requirements. All manuals and legislative requirements have been reviewed by the Health and Safety team and incorporated into the maintenance schedule.

All resources required for emergency response plans are first identified at project start up using form A-004 Mobilization Checklist.

Emergency response equipment such as first aid kits, AED's, fire extinguishers and eye wash stations is clearly marked with signage. Emergency response equipment location(s) on site are identified in the mandatory site-specific orientations. Emergency response equipment

must be readily available in each work area relevant to the potential emergency situations that may arise. Emergency response equipment is inspected and maintained according to the following schedule:

Equipment Type	Frequency	Documentation Requirements
First Aid Kits, Naloxone and Eye Wash	At a minimum a quarterly inspection is performed	A-012 Quarterly First Aid Kit Inspection
AED's	At a minimum a quarterly inspection is performed Pads and batteries are changed as per manufacturer	A-012 Quarterly First Aid Kit Inspection
Fire Extinguishers	Monthly in-house inspection Annual 3rd party inspection	Inspections recorded on inspection tag

EMERGENCY COMMUNICATION SYSTEM

Frecon offices are equipped with fire alarms to notify workers of an emergency. All office workers also have access to a phone and emergency contact numbers.

For project sites, the type of communication system is determined by reviewing the work area, building layout, number of personnel at the project site, and noise levels. The preferred communication system on site is the use of an air horn. Exact communication methods are included within the site-specific safety plan. Emergency communication methods will be communicated to personnel upon start-up of a project during the site-specific orientation.

EMERGENCY RESPONSE PLAN TESTING

An annual fire drill is conducted at the main offices. The drill is recorded on A-025 Emergency Response Drill Record. For project sites, emergency response drills will be coordinated with the client and the subcontractors. Emergency response drills are recorded in Corfix along with any corrective actions that are needed. The HSE Department will ensure that all action items raised during emergency response plan testing are followed up to completion. All records of emergency response plan testing are maintained on Corfix.

TRAINING

Emergency response plans and procedures are reviewed and communicated with employees upon hire during their employee orientation. The first day for all employees starts at the office with Frecon's safety orientation. This orientation includes reviewing emergency response procedures. For more details on this process, refer to the Training Procedure FC-HSE-PRO-009 as part of Element 8.1. For employees or subcontractors going to site, a site-specific orientation is given at the site. The office or the subcontractor's primary contact will

inform the site supervisor that a new worker is coming to site. The site-specific orientation will also covers review the site-specific emergency response plans and locations of emergency response equipment. If any changes are made to emergency response plans and procedures, these are re-communicated to workers through toolbox talks, safety meetings or a re-orientation. Fall protection plans that are developed for project sites are also reviewed with all personnel and training is provided on rescue measures.

Any further training needs relating to performing emergency response duties will be outlined in the training needs analysis. This process is described in further detail in the Training Procedure FC-HSE-PRO-009 (as part of Element 8.1). The HSE Department will coordinate additional training for any employees willing to perform first aid on site. Subcontractors will arrange for training of their own workers.

Currently, Frecon has identified the following additional emergency response training:

1. Fire extinguisher - How to use a fire extinguisher is reviewed on all projects during site-specific orientations. A fire extinguisher course is offered to all employees upon hire.
2. First Aid – First aid training is organized by the HSE Department. Refer to First Aid Procedure FC-HSE-PRO-018 for more details on this program.

COMMUNICATION

If emergency response plans need to be reviewed by or communicated to interested parties such as a client, the Fire Marshall or a neighbour, they will be shared with the relevant interested parties prior to commencing work which can be done by e-mail or sharing paper copies on site. The interested parties will be asked to provide input and approve if necessary.

An emergency contact list is developed for each project site which lists all Frecon emergency contacts and relevant external contacts such as hydro, gas and any client contacts. These lists are posted on the noticeboards and communicated during the site-specific orientation.

The HSE Department in conjunction with project management is responsible for ensuring that contact information is up to date. The emergency response plans identify communication methods along with who is to perform the communication.

Any communication with outside agencies is handled by Frecon's Senior Management.

EMERGENCY RESPONSE PLAN REVIEW

The emergency response plans will be reviewed at a minimum of annually. The plans will also be updated should there be any changes to a hazard assessment that may identify a potential hazard that would require an emergency response plan. Additionally, if there is an emergency that occurs on site, the plans will be reviewed to ensure the plans are up to date. The plans will be sent out for commenting via e-mail by the Health and Safety team. Should

any revisions to the plan be required, these will be made by the Health and Safety team and a description of the changes recorded in the revision history table.

The following process is followed to update plans following changes:

Step 1 The HSE Department is notified of a change on site (such as to the scope of services/work, new hazards on site etc.,), or an emergency (or drill) has occurred where there are lessons learned or corrective actions to take. Note: the management of change process is also followed where a management of change form will be completed as per Element 14.2.

Step 2 The emergency response plan is reviewed by the interested parties that were identified in the emergency response plan. Input is gathered and discussed. Once all feedback has been received, the emergency response plan is updated and sent out to site to be communicated to all personnel on site. This is done through a toolbox talk.

The following process is followed to review emergency response plans annually. Note this is the case for the office/shops and for any projects that last longer than 1 year:

Step 1 The HSE Department tracks the due dates for the annual reviews of the emergency response plans.

Step 2 The HSE Department will send out the plans to the interested parties identified as part of the review.

Step 3 The HSE Department will collect all comments and feedback and circulate the final version to management for approval by e-mail.

Step 4 The revised plans will be re-communicated to all personnel either by e-mail or a safety talk. Updated versions will be posted on the noticeboards.

REFERENCES

The following forms are used to document emergency response plans, inspection of equipment and testing of emergency response plans:

A-025 Emergency Response Drill Record
A-012 Quarterly First Aid Kit Inspection
A-004 Mobilization Checklist
Site-Specific Safety Plan
Fall Protection Plan
Fire Safety Plan

REVISION HISTORY

Revision	Description	Date	Approval
1	Developed emergency response planning procedure.	Feb 1, 2026	Douglas Drevniok
2	Updated the procedure to address the comments from the COR internal audit:	Aug 5, 2026	Douglas Drevniok

Revision	Description	Date	Approval
	• Clarified how input from interested parties is obtained • Clarified how injuries are minimized • Clarified how training is delivered and managed • Clarified how the review is conducted • Clarified how emergencies are communicated		

FIRST AID PROCEDURE

PURPOSE

The purpose of this procedure is to describe how the first aid program is managed and administered at Frecon.

SCOPE

The scope of this procedure applies to all Frecon project sites and offices.

FIRST AID GENERAL REQUIREMENTS

As per the First Aid Regulations 1101, the following are required on each site, project, office or work location:

1. Form 82 (In Case of Injury Poster).
2. An inspection card or sticker used to record the date and signature of the person responsible for inspecting the first aid kit OR availability of Form A-012 Quarterly First Aid Inspection.
3. Valid first aid training certificates posted (within, on or in close proximity) to the first aid kit
4. First Aid Minor Injury Log form (kept within, on or in close proximity to the first aid kit).

FIRST AID KIT REQUIREMENTS

Every workplace and project site will be equipped with first aid equipment in accordance with Regulation 1101 First Aid Requirements.

Frecon provides large first aid kits for all jobsites.

Item	Number
Current edition of a standard St. John Ambulance First Aid Manual	1
Safety pins	24
Basin, preferably stainless steel	1
Adhesive dressings individually wrapped	48
Rolls of adhesive tape, 1 inch wide	2
Rolls of 1-inch gauze bandage	12
sterile gauze pads, 3 inches square	48
Rolls of 2-inch gauze bandage	8
Rolls of 4-inch gauze bandage	8
Sterile surgical pads suitable for pressure dressings, individually wrapped	6
Triangular bandage	12
Splint padding	Assorted sizes

Item	Number
Roll-up splint	2
CPR mask	1
Non-latex gloves	Assorted sizes
Stretcher	1
Blankets	2

A large first aid kit is for workplaces with up to 200 employees in any one shift. It is not anticipated that more than 200 workers will be at a Frecon project in any one shift. If so, requirements made under Regulation 1101 regarding the provision of a first aid room will be provided.

Note: additional items may be added to first aid kits (such as eye wash solution, scissors, burn dressings etc.,) in line with Regulation 1101 requirements.

DEFIBRILLATORS (AED'S)

AED's will be provided in accordance with Section 27 of the O. Reg. 213/91: Construction Projects.

These requirements apply for projects that are scheduled to last longer than 3 months and have 20 or more workers.

AED's must be supplied with the following items:

1. One cardiopulmonary resuscitation mask.
2. One pair of scissors.
3. Two pairs of disposable medical grade gloves.
4. One disposable razor.
5. One garbage bag.
6. Four absorbent towels

FIRST AID KIT INSPECTION REQUIREMENTS

First aid kits will be inspected at a minimum of quarterly and logged on the inspection card/sticker found on the first aid kit or using Form A-012 Quarterly First Aid Kit Inspection.

AED's will be inspected on at a minimum of quarterly using Form A-012 Quarterly First Aid Kit Inspection.

AID PERSONNEL

All first aid kits and stations will be in the charge of personnel who hold valid and current first aid certificates. These workers must work in the immediate vicinity of the kit.

First aid training is tracked by the HSE Department and refresher training is coordinated when expiry dates come due.

The Company requires that at least one worker per site is trained in first aid and that a minimum of one worker is trained in the office. The level of first aid training required is the Standard First Aid and CPR/AED Level C.

In addition to the First Aid Regulation requirements, the Confined Space Regulations also require an adequate number of persons trained in first aid and CPR, available for immediate implementation of on-site rescue procedures.

FIRST AID REPORTING

All personnel are to report any injuries immediately to their supervisor. If any items are taken from the first aid kit, the injury must be logged on the First Aid Minor Injury Log or on Form A-021 Injury Treatment Record.

The following information must be included in the report as per the First Aid Regulations 1101 Section 5:

> Every employer shall keep a record of all circumstances respecting an accident as described by the injured worker, the date and time of its occurrence, the names of witnesses, the nature and exact location of the injuries to the worker and the date, time and nature of each first aid treatment given.

TRANSPORTATION TO MEDICAL ASSISTANCE

Should a worker be injured at work and require further medical assistance, the following steps will be followed:

1. Call –911, for ambulance transportation arrange for guidance of the emergency responders to the scene
2. When an ambulance is not required, provide transportation to obtain nearest medical centre.
3. Subcontractors are required to have their own plan in place to transport their non-critically injured worker to the nearest medical centre.

REFERENCES

Form A-012 Quarterly First Aid Kit Inspection.
Form A-021 Injury Treatment Record.

REVISION HISTORY

Revision	Description	Date	Approval
1	First aid procedure developed.	Feb 1, 2026	Douglas Drevniok
2	Updated to clarify what level of first aid training is required and form numbers.	Aug 5, 2026	Douglas Drevniok

STATISTICS AND RECORDS PROCEDURE

PURPOSE

This procedure describes how the company measures, monitors, and organizes health and safety performance. It ensures that relevant statistics are accurately collected, analyzed, and maintained to support continuous improvement and compliance with the management system.

ROLES AND RESPONSIBILITY

Senior Management

Senior Management is responsible for:

1 Provide the necessary resources and tools to collect, monitor, organize and measure health and safety performance.
2 Provide the necessary resources and tools to collect, monitor, organize and measure health and safety performance.
3 Review the statistics as per this procedure at a minimum of annually and provide feedback on the results.

The HSE Department

The HSE Department is responsible for:

1 Collect and tabulate the statistics mentioned in this procedure.
2 Identify trends and present the information to Senior Management at the Management Review meeting.
3 Recommend areas for improvement to address trends and ensure that actions are tracked and monitored to completion.
4 Maintain statistical records and reports.

Employees

Employees are responsible for:

1 Review trend results at annual meetings or during toolbox talks.

PROCEDURE

Health and safety data will be collected on a quarterly basis and recorded in an Excel spreadsheet for tracking purposes. The HSE Department is responsible for collecting, compiling, and maintaining this data.

Statistics will be analyzed for trends at least annually. A summary of the analysis, including identified trends and areas for improvement, will be developed and presented to Senior Management during the annual Management Review meeting.

Performance Indicators

The following statistics will be compiled and measured:

Indicator	Qualitative or Quantitative	Leading or Lagging
Supervisor inspections	Qualitative (any notes or information provided within) Quantitative – the number of inspections performed	Leading
Risk Manager inspections	Qualitative (any notes or information provided within) Quantitative – the number of inspections performed	Leading
JHSC Inspections	Qualitative (any notes or information provided within) Quantitative – the number of inspections performed	Leading
Equipment inspections	Qualitative (any notes or information provided within) – or common defects raised Quantitative – the number of inspections performed	Leading
MLITSD inspections and orders	Quantitative	Lagging
Disciplinary records (Safety Warnings)	Quantitative	Leading
Toolbox Talks	Quantitative	Leading
Daily Hazard Assessments completed	Quantitative	Leading
Incidents – medical aid, first aid, fatality, lost time injury, spills, violence and harassment, property damage, occupational illnesses, utility strikes	Quantitative	Lagging
Near Misses	Quantitative	Leading

Annual Performance Comparison

Health and safety performance will also be measured against past performance on an annual basis during the Management Review meeting. This comparison will be conducted by reviewing the previous year's performance indicators and comparing them to current results to evaluate improvement, decline, or emerging trends. The following specific steps are followed:

Step 1 Gather all data from the previous year and the current year – the data will go from January to December of each year. The data that is gathered are the indicators that are described within this procedure.

Step 2 Input the results into an excel spreadsheet and create tables and graphs. This will help to better present the data to the management team and spot any trends.

Step 3 Look for any patterns, increases or decreases in performance indicators.

Step 4 Establish reasons for the trends observed. Ask why the indicators have gone up or down. Review whether any changes were made during that time period to determine if there was any effect on the indicators.

Step 5 Ensure that all trends are documented and presented to the management team.

Analyzing Statistics and Identifying Trends

Following review and analysis of the data contained within the Excel spreadsheet, trends and opportunities for improvement will be identified. These findings will first be discussed at the Management Review meeting and, where required, incorporated into the company's action plan for tracking and completion.

First Aid Record Analysis

The analysis will also include a review of first aid treatment records. First aid records are entered into the Excel spreadsheet and uploaded to Corfix for documentation purposes.

The review will confirm that appropriate first aid treatment was provided and will examine:

1. The type of treatment administered
2. Supplies used
3. The nature of the injury
4. The source and cause of the injury

The following specific steps are in place to analyze first aid/injury records:

Step 1 – Gather all first aid/injury data. This is done by pulling reports from Corfix.

Step 2 – Compile the data into an excel sheet. Columns on the excel sheet will include the parameters listed above in this section.

Step 3 – Develop tables and graphs.

Step 4 – Look for any patterns, such as repeat occurrences or causes. Look for any increases or decreases in the parameters being analyzed.

Step 5 - Establish reasons for the trends observed. Ask why the indicators have gone up or down. Review whether any changes were made during that time period to determine if there was any effect on the indicators.

Step 6 – Ensure that all trends are documented and presented to the management team.

This analysis provides insight into injury patterns and supports the identification of preventative measures to reduce recurrence.

Corporate Summaries

Corporate summaries will be developed and reviewed during the Management Review meeting. Statistical information will be tabulated quarterly within the Excel spreadsheet and formally presented on an annual basis.

Communication

Statistical results, identified trends, and associated action plans will be communicated to personnel through one or more of the following methods:

1. Toolbox talks
2. Management Review meetings
3. Annual Safety Meeting
4. Noticeboard postings

Currently, employees have been identified as the relevant workplace parties. Where required, statistics and trend information may also be shared with subcontractors, visitors, or other external parties via email, during site JHSC meetings, or through noticeboard postings.

The results of the analysis will be documented within the Management Review meeting minutes. These records will be maintained on the company shared drive in accordance with the Record Retention Procedure.

FORMS

S4002 Corporate Statistics Spreadsheet

REVISION HISTORY

Revision	Description	Date	Approval
1	Developed procedure.	Feb 1, 2026	Douglas Drevniok
2	Updated procedure to address comments from the internal audit: • Clarified how previous performance is analyzed • Clarified how trends are identified • Clarified how first aid treatment records are analyzed	Aug 5, 2026	Douglas Drevniok

LEGISLATION PROCEDURE

PURPOSE

The purpose of this procedure is to describe how legislation, regulations, standards and other requirements are considered and incorporated into Frecon's OHSMS. It also describes how we conduct legal compliance evaluations.

SCOPE

This procedure applies to all Frecon's operations and sites.

ROLES AND RESPONSIBILITY

Senior Management is responsible for:

1. Ensures that adequate resources, supplies and equipment are provided to meet any legislated requirements.
2. Ensure competent site supervisors are appointed on projects.

HSE Department is responsible for:

1. Inform management of any legislative updates that may impact the OHSMS.
2. Perform random site audits to ensure legislative compliance.
3. Ensure project start-up checklists are completed.
4. Ensure up to date copies of postings for the noticeboards are available to employees.
5. Order updated green books.

Supervisors are responsible for:

1. Ensure that all legislated posting requirements are being met on site.
2. Ensure that all paperwork is being completed for the site.
3. Ensures that all required equipment and supplies required by Legislation is available on site and maintained in good condition.
4. Notify management or the HSE Department of any issues on site and if items cannot be immediately corrected.
5. Ensure that all workers are following legislated requirements and the Company's protocols.
6. Attend 5 step training supervisor awareness training.
7. Participate in any compliance audits as required.

Workers are responsible for:

1. Attend 4 Step Worker Awareness training.
2. Report any defects or dangerous situations immediately to their supervisor.
3. Follow the company's procedure for work refusals.
4. Participate in any compliance audits as required.

Subcontractors responsible for:

LEGISLATION CONSIDERATIONS

Legislation, regulations, standards and other requirements are taken into consideration for the following activities or processes:

1. Conducting job hazard assessments/Field Level Risk Assessments
2. Bidding on jobs or planning work activities
3. Creating safe job procedures and safe work practices
4. Developing or updating the preventative maintenance program
5. Reporting and investigating incidents
6. Determining training needs
7. Determining PPE requirements
8. Purchasing new equipment, tools, materials
9. Changing work methods or practices
10. Making changes to the OHSMS
11. Developing company rules
12. Developing emergency response plans

The company has completed a review of legal requirements and has developed their health and safety program based on these requirements. New legislation is reviewed and monitored to assess the impact it may have on the company's OHSMS. This is managed through the management of change program.

LIST OF LEGISLATION

The following legislation is applicable to the Frecon's OHSMS:

Occupational Health and Safety Act, R.S.O. 1990, c. O.1

O. Reg. 213/91: Construction Projects

R.R.O. 1990, Reg. 851: Industrial Establishments

O. Reg. 632/05: Confined Spaces

O. Reg. 381/15: Noise

O. Reg. 490/09: Designated Substance

O. Reg. 297/13: Occupational Health and Safety Awareness and Training

O. Reg. 213/07: Fire Code

O. Reg. 332/12: Building Code

Worker's Compensation Act, R.S.O. 1990, c. W.11

First Aid Regulations 1101

O. Reg. 87/13: Training Requirements for Certain Compulsory Trades

O. Reg. 278/05: Asbestos on Construction Projects and in Buildings and Repair Operations

R.R.O. 1990, Reg. 833: Control of Exposure to Biological or Chemical Agents

R.R.O. 1990, Reg. 860: Workplace Hazardous Materials Information System (WHMIS)

Highway Traffic Act, R.S.O. 1990, c. H.8

Criminal Code, (R.S.C., 1985, c. C-46)

Ontario Traffic Manual – Book 7

Transportation of Dangerous Goods Regulations (SOR/2001-286)

Commercial Vehicle Drivers Hours of Service Regulations (SOR/2005-313)

Smoke-free Ontario Act 2017, S.O. 2017, c. 26, Sched. 3

Employment Standards Act 2000, S.O. 2000, c. 41

O. Reg. 420/21: Notices and Reports Under Section 51 to 53.1 of the Act – Fatalities, Critical Injuries, Occupational Illnesses and Other Incidents

O. Reg. 35/08: Return to Work and Re-Employment — Construction Industry

O. Reg. 211/01: Propane storage and handling

R.R.O. 1990, Reg. 856: Roll-Over Protective Structures

O. Reg. 474/07 – Needle Safety

This list was established by the HSE Department in consultation with management and is applicable to the projects and scope of work performed at the company. The initial list was developed by reviewing the Ontario E-Laws website, WSIB website, the MTO website and reviewing the CSA Communities page. When legislation or other requirement become applicable to the work being performed by the company, the legislation is added to this list.

Identifying legislation and other requirements for project sites is done by:

Step 1 A project start up meeting takes place to discuss the scope of work of the project and a project start up checklist is used.

Step 2 During this meeting, the applicable legislation and other requirements to the project is reviewed. The HSE Department consult the list of legislation and standards (located in this procedure) and identify what applies based on the scope of work, work activities, hazards encountered and equipment being used on site.

Step 3 If the list requires to be updated, the HSE Department will update the list of legislation found in this procedure or reference the legislation in the site-specific safety plan.

Step 4 The HSE Department will review to determine if any further controls need to be implemented to achieve compliance with the legislation, standard or other requirement that was identified.

Other Standards:

The list of other standards and documents that have been consulted and reviewed are:

1. Client building protocols
2. CSA standards (for example, for confined space)
3. IHSA's Health and Safety Manual

4. Manufacturer's manuals – for the various equipment, tools and vehicles that may be used on site
5. Safety Data Sheets – for the products that we use

MAINTAINING DOCUMENTATION

Updates to the list of legislation is monitored by the HSE Department. If changes to regulations, standards or other requirements take place, these are tracked by the management of change procedure (as part of Element 14.2). The HSE Department will then assess the impact of any changes to regulations, standards or other requirements on the OHSMS.

The Green Book will be made available to all employees by posting on the health and safety board. A digital QR code may also be used to access legislation. Updated copies will be ordered and distributed as they become available or when legislation changes. The HSE Department is responsible for monitoring the new releases of green books and placing the order when they become available. The books are then distributed to sites.

QR codes will be updated by the HSE Department if the location of any sources or links are changed. An annual review is performed to ensure that QR codes are functional and links to the correct legislation, standards or other requirements are provided.

The HSE Department monitors updates to legislation on a regular basis. The HSE Department is signed up to safety newsletters and attend external training or conferences, as appropriate, to stay current with health and safety news.

METHODS TO ENSURE COMPLIANCE

Senior Management is responsible for ensuring that competent site supervisors are appointed at every project site. Supervisors are required to complete weekly supervisor inspections and are required to complete any health and safety related paperwork for their site.

Supervisors have a visible presence on the site and are required to correct unsafe behaviours and ensure that their site is compliant with legislative requirements.

The HSE Department also complete site inspections at random. These site visits can include evaluating certain aspects of legal compliance, ensuring that documentation requirements are being met and ensuring the site is compliant with the Company's program requirements.

If compliance is not observed, the management team will speak to the supervisor to have the situation or condition rectified. Should there be a need for enforcement for any workplace parties, the disciplinary procedure will be followed.

All subcontractors are required to follow the company's and legislated requirements.

POSTING REQUIREMENTS AND LEGISLATION

The weekly supervisor inspections include ensuring that required postings are up to date and review key legislative requirements applicable to all project sites.

The Green Book will be made available to all employees by posting on the health and safety board. A digital QR code may also be used to access legislation. Updated copies will be ordered and distributed as they become available or when legislation changes. The HSE Department is responsible for monitoring the new releases of green books and placing the order when they become available. The books are then distributed to all project sites and offices/shops.

For new projects that come online, a start up safety package of posted materials along with a green book is provided in the trailer.

See table below for other required postings on sites.

Posting type
Green Book (or printed copy of updated and applicable legislation)
Ministry of Labour, Training and Skills Development orders or site visit reports
Health and Safety Policy
Workplace Violence and Harassment Policy
JHSC minutes (most recent copy)
JHSC member names and location (including any Worker Trades Committee)
Notice of Project Form (when the company is the Constructor) Notice of use of suspended access equipment
Form 1000's (posted or made available)
Emergency response plan: Includes: • First Aid Procedures
• Map to nearest hospital
• Emergency contact phone numbers (may be included as part of emergency response procedures/plan)
• First Aid training certificates
WSIB's Form 82 Poster – In Case of Injury
Inspection sticker/card on first aid kits
Minor Injury log form

LEGAL COMPLIANCE EVALUATIONS

The Company has implemented an audit program to review our compliance with Legislated requirements. Every year, different sections of Legal or other requirements will be reviewed. The legislation or other requirements will be pulled from the list identified in this procedure.

The audit is conducted either by a third-party consultant or a member of the Health and Safety team. Other relevant workplace parties may participate in the audit process. The audit will consist of reviewing the applicable legislative requirements, reviewing documentation and records, conducting observations on site and if required, speaking with personnel involved with the work activity.

The legal compliance evaluation report will document what legislation was reviewed and will identify if there were any corrective actions, opportunities for improvement and if compliance was achieved. This will be logged on form S4003: Legal Compliance Evaluation

REFERENCES

S4003 Legal Compliance Evaluation Form
A-004 Mobilization Checklist

REVISION HISTORY

REVISION	DESCRIPTION	DATE	APPROVAL
1	Procedure created.	Feb 1, 2026	Douglas Drevniok
2	Updated procedure to address comments from the internal audit: • Clarified how legislation is identified • Listed additional forms and documents • Clarified how documents are maintained	Aug 5, 2026	Douglas Drevniok

MANAGEMENT REVIEW PROCEDURE

PURPOSE

The purpose of this procedure is to describe how the Management Review takes place, what is discussed, as well as the inputs and outputs.

SCOPE

This procedure applies to Senior Management, the HSE Department and workers involved in or impacted by the Occupational Health and Safety Management System (OHSMS).

ROLES AND RESPONSIBILITY

Senior Management is responsible for:

1. Attending Management Review meetings.
2. Identifying areas for improvement and supporting continual improvement.
3. Reviewing OHSMS program documentation annually.
4. Providing input into the annual goals and objectives.

HSE Department is responsible for:

1. Gathering all required information for the Management Review meeting.
2. Scheduling Management Review meetings.
3. Recording attendance and meeting minutes.
4. Developing and monitoring the progress of action plans.
5. Making necessary updates to OH&S program documentation.
6. Ensuring OH&S objectives are communicated to personnel.

Workers are responsible for:

1. Reviewing the annual action plans and OH&S objectives

MEETING FREQUENCY

Management Review meetings will take place at least once per year. Meetings may be broken into smaller sessions throughout the year to address specific topics as required. Meetings are organized and coordinated by the HSE Department.

ATTENDANCE

A member of Senior Management (President) will attend the meeting along with the Internal Auditor. Additional personnel may attend as required or requested. Attendance will be documented.

MEETING MINUTES

Management Review meeting minutes will be documented using the form F1922 Management Review Meeting Minutes Template and retained in accordance with the Record Retention Procedure.

The Internal Auditor is responsible for recording the meeting minutes. Records will include:

1. Date
2. Time
3. Location
4. Attendees
5. Summary of discussions
6. Decisions made
7. Action items
8. Assigned responsibilities

MANAGEMENT REVIEW INPUTS

The following will be reviewed and discussed during the Management Review meeting:

Audit Results

1. Internal audit results.
2. External audit results.
3. COR™ audit results.

Evaluation of OHSMS Effectiveness

1. Summary of inspection results.
2. Summary of hazard assessment results.
3. Review of the subcontractor management program.
4. Comprehensive review of OHSMS documentation to determine if updates are required.

Legal and Other Requirements

1. Evaluation of compliance with applicable legal and other requirements.
2. Results of legal compliance audits as outlined in the Legislation Procedure.

Previous Management Review Actions

1. Status of actions from previous Management Review meetings.

Participation and Communication

1. Joint Health and Safety Committee (JHSC) or Health and Safety Representative feedback.
2. Employee feedback from annual company-wide meetings.
3. Communication with external parties (e.g., clients, Fire Services, MLITSD reports).

OH&S Performance

1. Key Performance Indicators (KPIs) and statistical trends.
2. Evaluation of progress toward OH&S objectives.
3. Review of previous year's objectives to determine if targets were met.

Incident Performance

1. Incident statistics and trend analysis.
2. Status of corrective and preventative actions.
3. Review of significant incidents.
4. Comparison of current data to previous years.

Changing Circumstances

1. Changes to products, materials, services, or projects.
2. Changes in resources, organizational structure, environment, or technology.
3. Updates to legal and regulatory requirements.

Barriers to Worker Participation

1. Identified barriers to worker participation in the OHSMS.
2. Incomplete inspections.
3. Absence of a Health & Safety Representative.
4. JHSC meeting participation.
5. Annual safety meeting participation.

Recommendations for Improvement

MANAGEMENT REVIEW OUTPUTS

Possible results from the Management Review are:

1. Updates or revisions to Policies, Procedures, Standards, Manuals, Forms, and other OH&S Program documentation. Any required changes will be coordinated and implemented by the HSE Department following the meeting.
2. Establishment of measurable objectives that are clearly defined and aligned with the OH&S Management System (OHSMS).
3. Development of action plan(s) outlining how the objectives will be achieved, including responsibilities, timelines, and methods for implementation.
4. Identification and allocation of any required resources necessary to support the effective implementation and maintenance of the OHSMS.
5. Revisions to other elements of the OHSMS, where applicable.
6. Identification and removal of barriers to worker participation in the OHSMS, including appropriate corrective actions where required.
7. Communication of objectives and associated action plan(s) to all employees.

OBJECTIVES AND ACTIONS PLANS

Three (3) separate action plans will be established:

1. One (1) action plan resulting from the COR™ Internal and/or External Audit.
2. One (1) action plan resulting from the Management Review.
3. One (1) action plan addressing the annual OH&S objectives.

OH&S objectives will be identified following the Management Review meeting and will be based on discussions, findings, trends, and identified opportunities for improvement. Each objective will be clearly documented and will include:

1. A clear statement of the objective
2. Assigned responsibility for achievement
3. Specific actions required to achieve the objective
4. Target completion date(s)
5. The intended or desired outcome

All objectives will be measurable to ensure progress can be monitored and achievement can be verified. The Internal Auditor will monitor the status of the action plans and report on progress during Management Review meetings.

Objectives and associated action plans will be communicated to personnel through appropriate methods, such as toolbox talks, the annual safety meeting, and/or posting on company notice boards. The HSE Department is responsible for ensuring that OH&S objectives are effectively communicated.

RECORD RETENTION AND FORMS

The HSE Department is responsible for documenting the Management Review meeting minutes and developing any required action plans arising from the meeting. Records of the Management Review, including the completed form F1922 Management Review Meeting Minutes Template, will be retained on the company shared drive in accordance with the Record Retention Procedure.

REVISION HISTORY

REVISION	DESCRIPTION	DATE	APPROVAL
R1	Developed Management Review procedure.	Feb 1, 2026	Douglas Drevniok

FC-HSE-PRO-019

MANAGEMENT OF CHANGE PROCEDURE

PURPOSE

The purpose of this procedure is to describe how the management of change process takes place.

SCOPE

This procedure applies to Senior Management, the HSE Department and workers involved in or impacted by the Occupational Health and Safety Management System (OHSMS).

ROLES AND RESPONSIBILITY

Senior Management is responsible for:

1. Approving all changes before they are implemented.
2. Reviewing the Management of Change Control (MOC) form.

HSE Department Is responsible for:

1. Reviewing any MOC form with the change owners and help identify any changes that will have an impact on the OHSMS program.
2. Identifying any actions required with the change owner.
3. Keeping a log of change request forms and follow-up with the change owner to ensure all action items are completed.

Change Requesters are responsible for:

1. Completing a MOC form when a change is required.
2. Notifying the change management team if a change is needed or requested.
3. Do not proceed with any changes until approval has been granted by the review team and senior management.

Workers are responsible for:

1. Notify your manager if a change is required
2. Report any unsafe conditions resulting from a change to your supervisor immediately

CRITERIA

A Management of Change Control Form must be completed in the following situations:

1. A change is being requested to OHSMS documentation such as procedures, hazard assessments, training material, or forms.

2. A change or modification is needed to a piece of equipment, attachment, vehicle or a tool.
3. New tools or equipment are needed.
4. The company will be offering new services.
5. New products or materials are needed – such as a new chemical product.
6. A transfer of significant H&S responsibilities to another worker or a significant organizational change.
7. A process needs to be modified.
8. A change to a legislated requirement that must be implemented.
9. A change in layout to the work area.
10. Changing any safety devices or switches.
11. Building renovations or modifications to a building structure.
12. New developments in OH&S knowledge or technology.

PROCEDURE

The change requester is responsible for completing the Management of Change Control (MOC) Form in which a description of the change must be provided along with potential impacts and actions required.

Step 1 The form is submitted to the HSE Department for review.

Step 2 The HSE Department reviews this form along with any other relevant team members that may be impacted by the change. If required, a meeting is scheduled to discuss the change and include details on the actions required, who will complete the actions and within what timeframe.

Step 3 The MOC form includes a review of OHSMS elements to identify if any changes are required. This includes reviewing if any hazard or risk assessments are required (as part of Element 2), if any control programs are required (as part of Element 3) or if any training is required (as part of Element 8.1).

Step 4 The change is then approved by Senior Management. If a change requested is not approved, the change owner will contact the change requester and let them know why.

Step 5 The HSE Department will track all action items relating to implementation of the change.

Step 6 MOC forms will be stored on the shared drive or within Corfix.

COMMUNICATION OF CHANGES

Should any changes require communication to any workplace parties, the method of communication will be outlined in the MOC form. Some methods can include during the annual company-wide meeting, a toolbox talk, a safety meeting or company memo.

REFERENCES

F1923 Management of Change Control (MOC) Form

REVISION HISTORY

REVISION	DESCRIPTION	DATE	APPROVAL
1	Developed Management of Change procedure.	Feb 1, 2026	Douglas Drevniok

STANDARDS

Health & Safety Management System

FRECON
GROUP OF COMPANIES INC.

ROLES AND RESPONSIBILITIES

Every team member of Frecon has a responsibility as part of their employment to fulfill and ensure the safe work environment of all employees and subtrades as part of Frecon's safety program. Specifically, the following responsibilities have been assigned but it is incumbent of all employees to self-monitor accordingly.

ROLES AND RESPONSIBILITY

Senior Management is responsible to:

1. Conduct a review no later than the first quarter of the year and update this Health & Safety Program with input from the Risk & Safety Manager.
2. Consider safety as well as production in all planning.
3. Take every reasonable precaution to prevent personal injury.
4. Provide and maintaining a safe, healthy work environment.
5. Ensure any accident or incident occurring in the workplace is thoroughly investigated and that remedial steps are taken to prevent a recurrence.
6. Ensure compliance with all applicable regulations.
7. Provide competent supervision.
8. Assist and co-operate with Superintendents, Health & Safety Representatives (HSR), the Risk & Safety Manager as well as members of Joint Health and Safety Committees (JHSC).

HSE Department is responsible to:

1. Be familiar with the requirements of the Occupational Health & Safety Act and its Regulations as well as the Frecon's Health & Safety Program.
2. Obtain and maintain required training certificates.
3. Train employees as per Element 8, Training and Communication.
4. Assist Site Supervisors, HRS/JHSC members and other employees with health & safety matters.
5. Record minutes of safety/JHSC meetings when attended.
6. Investigate all accidents, incidents, close calls and first aid treatments, using form A-019.
7. Confer with superintendents, employees, sub-contractors and Ministry of Labour inspectors as required.
8. Inspect/audit sites, to verify that all applicable legislation is being complied with. Review findings with the Site Supervisor/Superintendent to ensure corrective action is taken on any outstanding items.
9. Submit Safety Manager Site Inspections, form A-011.
10. Review on an annual basis the company's Health & Safety Program with input from employees and to ensure compliance with current legislation.

Supervisor/Superintendent is responsible to:

1. Be familiar with the requirements of the Occupational Health & Safety Act, Regulations for Construction Projects as well as Frecon's Health & Safety Program.

2. Be responsible for the safety of the entire project under their charge including accident investigation and reporting.
3. Co-operate fully with the HSR and JHSC members, where applicable.
4. Cooperate with the Risk & Safety Manager.
5. Actively on a continual basis ensure that all aspects of the Occupational Health & Safety Act, Regulations for Construction Projects, Frecon's Health & Safety Program, Safe Work Practices and Safe Job Procedures are being followed by everyone on site.
6. Ensure that all employees new to a site receive a Site Orientation, including introduction to the HSR/JHSC and locations of emergency equipment, first aid station, fire extinguishers, toilets, parking, building exits, potential or actual dangers on the project and hazardous materials. All new workers sign an acknowledgment confirming they have reviewed each section of the orientation (form A-002) in its entirety. The site supervisor completes and signs the acknowledgment and issues a sticker for the worker's hard hat indicating they have completed the site orientation.
7. Train and explain safety procedures and policies to their direct workers, particularly to workers new to the industry.
8. Advise their direct workers of potential or actual dangers including hazardous materials specific to the workplace on a continuous basis.
9. Ensure required personal protective equipment is properly used by workers to perform their tasks in a safe manner.
10. Ensure that all equipment, including safety and protective equipment, is in good operational condition and that any defective equipment is immediately tagged & removed for repair.
11. Report all accidents and incidents immediately to Risk and Safety Manager and Senior Management by completing form A-018, Accident / Incident Report. This includes incidents that do not require First Aid or Medical Aid Treatment. This type of injury may include possible pulled muscle(s), bruised body part(s).
12. Participate in investigations and implement the remedial steps necessary to prevent a recurrence.
13. Immediately inform Senior Management and the Risk & Safety Manager if a worker cannot perform their regular work duties and is given alternate work.
14. Maintain a current Standard First Aid certificate.
15. Inspect the workplace using form A-009 on the first workday of the week and review their findings at the weekly health and safety meeting talk (toolbox talk).
16. Ensure the HSR or JHSC Member completes an inspection, form A-010, on the first workday of the first full week of the month and posts the inspection on the safety board.
17. Conduct a weekly health & safety talk with all workers on site on the first workday of each week and document the meeting/talk using form A-003: Toolbox Talk after their weekly inspection has been completed. The HRS/JHSC Representative's monthly inspection when applicable will be included.
18. Issue Safety Warning, form A-020 to workers & subtrade supervisors when they are in contravention of the legislation, Frecon's Health & Safety Program, Safe Job Procedures and Safe Work Practices.

Workers are responsible to:

1. Comply with the requirements of the Occupational Health & Safety Act, Regulations for Construction Projects, Frecon's Health & Safety Program, Safe Job Procedures and Safe Work Practices.
2. Perform work with a safety-first attitude.

3. Participate in the site orientation and company training programs.
4. Cooperate with the Site Supervisor, HSR/JHSC Members, Risk & Safety Manager and HSE Department.
5. Wear a hard hat and safety footwear at all times on project. Inspect, wear and use properly maintained personal protective equipment when required for the task at hand.
6. Immediately report any accident or close call to their supervisor.
7. Report all injuries to the Site Supervisor as soon as safely possible and before the end of the day of injury.
8. Immediately, without delay, report to their supervisor any condition, practice or hazard that may cause injury to a worker or damage to equipment.
9. Immediately report any condition that may cause a loss of work time (i.e. sore back) to their supervisor so that a modified work program can be implemented if required.
10. If you seek medical aid, for a work-related injury you, must ensure the Supervisor, Senior Management or Risk & Safety Manager) is aware of it and obtain page two of the Doctor's WSIB Form 8 which is to be given to the Site Supervisor, Senior Management or Risk and Safety Manager, immediately after seeing the doctor. On all follow up visits to the doctor(s), a FAF (Functional Abilities Form) part one needs to be completed by you and the rest by the doctor and submitted to the Site Supervisor, Senior Management or Risk & Safety Manager).
11. Use site washrooms in a responsible and hygienic manner.
12. Be accountable for their own safety and work in a manner so as not to endanger themselves or fellow workers.
13. Be aware of the OHSA procedures for refusal to work if the employee feels their safety is in jeopardy.
14. Maintain a tidy and hazard-free work area.
15. Personal cell phone usage is limited to when workers are not on the clock. This essentially means before & after the work day or during the lunch period. Personal cell phones are not to be used during paid break periods or while working. Company cell phones are allowed to be used during the work day for work purposes and will be limited to circumstances when the worker can safely use the cell phone, all workers are not to continue to work while using a company cell phone.
16. Video and/or audio recording without prior consent is strictly prohibited. This means that camera, microphone, or a recording device must not be used without the expressed permission of the person being recorded. Additionally, the recording must not be used for any nefarious purposes, such as blackmail, fraud, or harassment.
17. No radios will be allowed on the construction project, unless the Site Supervisor specifically approves its use. No personal CD player, MP3 players, tape players or radios with earphones are permitted.
18. Horseplay or dangerous behaviour will not be permitted. No person under the influence of intoxicating alcohol or drugs will be permitted to work. Any person thought to be under the influence of alcohol or drugs will be asked to leave the site immediately and will be subject to their employment being terminated.
19. Employees shall know their own physical limitations and the approximate weight of materials they are trying to lift. Use correct lifting techniques and get help to lift or move objects not safe to handle alone.

Subcontractor is responsible to:

1. Participate in the site orientation.

2. Comply with the Occupational Health & Safety Act, Regulations for Construction Projects as well as Frecon's Health & Safety Program, Safe Job Procedures and Safe Work Practices.
3. Cooperate with the Site Supervisor, HSR/JHSC Members, Risk & Safety Manager and HSE Department.
4. Wear a hard hat and safety footwear at all times on project. Inspect, wear and use properly maintained personal protective equipment when required for the task at hand.
5. Immediately report any accident or close call to their supervisor.
6. Report all injuries to the Site Supervisor as soon as safely possible and before the latest by the end of the day of injury.
7. Be accountable for their own safety and work in a manner so as not to endanger others.
8. Maintain a tidy and hazard-free work area.
9. No radios will be allowed on the construction project, unless the Site Supervisor specifically approves their use. No personal CD player, MP3 players, tape players or radios with earphones are permitted.
10. Horseplay or dangerous behavior will not be permitted. No person under the influence of intoxicating alcohol or drugs will be permitted to work. Any person thought to be under the influence of alcohol or drugs will be asked to leave the site immediately

Supplier is responsible to:

1. Comply with the Occupational Health & Safety Act, Regulations for Construction Projects as well as Frecon's Health & Safety Program, Safe Job Procedures and Safe Work Practices.
2. Cooperate with the Site Supervisor, HSR/JHSC Members, Risk & Safety Manager and HSE Department.
3. Wear a hard hat and safety footwear at all times on project. Inspect, wear and use properly maintained personal protective equipment when required for the task at hand.
4. Immediately report any accident or close call to their supervisor.
5. Report all injuries to the Site Supervisor as soon as safely possible and before the end of the day of injury.
6. Be accountable for their own safety and work in a manner so as not to endanger others.

Visitors are responsible to:

1. Comply with the Occupational Health & Safety Act, Regulations for Construction Projects as well as Frecon's Health & Safety Program, Safe Job Procedures and Safe Work Practices.
2. Cooperate with the Site Supervisor, HSR/JHSC Members, Risk & Safety Manager and HSE Department.
3. Wear a hard hat and safety footwear at all times on project. Inspect, wear and use properly maintained personal protective equipment as instructed by Site Supervisor.
4. Report all injuries to the Site Supervisor as soon as safely possible and before the end of visit.
5. Be accountable for their own safety and behave in a manner so as not to endanger any workers.

REVISION HISTORY

REVISION	DESCRIPTION	DATE	APPROVAL
1	Created	February 6, 2026	Douglas Drevniok

GENERAL COMPANY RULES

Frecon's general company rules establish the minimum standards of conduct expected from our workforce and ensure that non-compliances are addressed in a consistent manner. Our rules are posted on all our site safety boards and are available electronically. Like applicable legislation, Frecon's rules must be followed at all times and are enforced using our Progressive Disciplinary Procedure (FC-HSE-PRO-017)¡.

Frecon's workforce includes contractors and trades and are referred to here simply as workers.

LEGISLATION

1. All workers must adhere to the Occupational Health and Safety Act (OHSA) and O. Reg. 213/91: Construction Projects.
2. Operate vehicles according to the highway traffic regulations.

MANDATORY PPE

All personal protective equipment (PPE) is to fit properly and to be inspected before wearing. Refer to Frecon's PPE Procedures (FC-HSE-PRO-007).

1. Head Protection - CSA-approved Class E, Type I or II hard hats must be worn at all times on projects.
2. Foot Protection - Grade 1 protective footwear with a puncture-resistant sole must be worn at all times on projects.
3. Clothing - Long pants and a shirt with sleeves are required and must be appropriate for duties being performed. Loose or frayed clothing and jewelry should not be worn around moving machinery or other sources of entanglement. Shorts, muscle shirts and tank tops are not permitted.
4. Ear protection - When the level is 85dBA or more, earmuffs or ear plugs are to be worn. Where practicable, a clearly visible warning sign shall be posted at every approach to an area when sound level regularly exceeds 85 dBA.
5. Specialized PPE - Task-specific protection (fall protection, eye, hearing, skin, and respiratory) must be used as hazards controls dictate.

TRAINING & ORIENTATION

1. Safety Orientation - All workers must complete a site-specific safety orientation before starting work and adhere to safe work practices.
2. Working at Heights - Mandatory for any worker exposed to a fall of 3 metres or more or using specific fall protection systems. Training must be renewed every 3 years.
3. Legislated Training - Completion of all required training and any associated training for specialized equipment like elevated work platforms. All workers must carry with them proof of their training certification.

SITE CONDUCT & SAFETY REPORTING

1. Hazard Reporting - Workers have a legal duty to report any hazards, defects in equipment, or health / safety violations to their supervisor.
2. Right to Refuse - Every worker has the legal right to refuse work they believe is unsafe.
3. Ethical Behaviour - Workers are to behave in a way that does not compromise your professionalism and most importantly, your integrity. Workers must complete work in an ethical manner and deal with coworkers in a fair and respectful way.
4. Attendance - Workers are to attend work when scheduled and adhere to prescribed work periods in a punctual manner.
5. No entry to a confined space is allowed unless Confined Spaces Regulation 632/05 is complied with. All persons must be trained in each specific confined space they are going to enter.
6. Mobile devices are not to be used while working. Personal use is to be limited to before and after the workday or during the lunch period. Using mobile devices for work purposes will be limited to circumstances when the worker can safely do so.
7. Recordings including video and/or audio recordings without prior consent are strictly prohibited. Cameras, microphones, or recording devices must not be used without the express permission of the person being recorded.
8. No radios will be allowed on project sites, unless the Site Superintendent specifically approves their use. Personal CD players, MP3 players, tape players or radios with earphones/earbuds are not permitted.
9. Smoking/vaping - Workers are prohibited to smoke/vape on any jobsite except where a specific smoking area has been designated.
10. Substance Abuse Possession or use of intoxicating beverages or unauthorized drugs is strictly forbidden on job sites.
11. Housekeeping - Work areas must be kept clean and organized. Tools shall be in good repair and used with guards and safety devices. Use site washrooms in a responsible and hygienic manner.

INCIDENT & EMERGENCY PROTOCOLS

1. Reporting - All accidents, "near misses," and critical injuries must be reported immediately to a supervisor.
2. Emergency Procedures - Written emergency procedures must be posted in a conspicuous place and reviewed with the Joint Health and Safety Committee (JHSC).

REVISION HISTORY

REVISION	DESCRIPTION	DATE	APPROVAL
1	Standard created	Feb 1, 2026	Douglas Drevniok

Legend: X= required, *=optional

Training Needs Analysis

Reviewed By: **Dana Drevniok** **Date Created:** **Aug 20 2026** **Updated:**

Category	Training	Requirement	FGC (Supervisors)	FCL (Office Only)	FLS - Labourers	Refresher Requirements	Additional Notes
General OHS	Health and Safety Orientation	COR Requirement OHSA, s.32.0.5(2)	X	X	X	None - unless changes are made to the program	
	4 Step/5 Step Training (Ontario)	OHS Awareness and Training (Reg.297/13), s.1(1)	X	X	X	None	
	Workplace Violence and Harassment Training	OHSA, s.32.0.8	X	X	X	Every 3 years	
	PPE Training	Construction Projects, s.21(3) Noise (Reg.381/15), s.3	X	*	X	Every 3 years	PMs
	WHMIS	WHMIS (Reg.860)	X	X	X	Every year	
Working at Heights / Fall Protection	Working at Heights (Ontario)	OHS Awareness and Training (Reg.297/13), s.6-10 Construction Projects, s.26.2	X	*	X	Every 3 years	
Equipment	Forklift	Occupational Health and Safety Act CSA Standard	*	N/A	*	Every 3 years	
	Elevated Work Platform (EWP)	Construction Projects, s.147 (1) Construction Projects, s.144(3)(b)	*	N/A	*	Every 3 years (5yrs 2027)	
	Skid Steer	Occupational Health and Safety Act	*	N/A	*	Every 3 years	
	Telehandler	Occupational Health and Safety Act	*	N/A	*	Every 3 years	
	Spotter/Signaller	Construction Projects, s.188(8) Construction Projects, s.104, and 106	*	N/A	*	None	
	Propane	Fuel Industry Certificates (Reg.215/01), s.48	*	N/A	*	Every 3 years	
Confined Space	Confined Space Awareness	Confined Spaces Regulation (O. Reg. 632/05, s.9.1)	X	N/A	*	None	
	Confined Space Entry and Monitor	Confined Space Regulations	*	N/A	*	None	Every 3 years if working in confined spaces
Asbestos	Asbestos Awareness	Asbestos on Construction Projects (Reg.278/05), s.19(1) and (3)	X	N/A	X	Every 3 years	
Other	JHSC Part 1 and 2 (Ontario)	Occupational Health and Safety Act (ON)	*	*	*	Every 3 years	*Only if projects last longer than 3 months and more than 20 workers are anticipated at the project.
	First Aid	First Aid 1101	X	*	*	Every 3 years	
	Naloxone Training	Occupational Health and Safety Act	*	*	*	None	
	Supervisor Training/Due Diligence	Occupational Health and Safety Act	X	*	N/A	Every 3 years	
	Incident Investigation Training	COR Requirement	X	N/A	*	Every 3 years	
	Ladder Safety	Best Practice	*	N/A	*	Every 3 years	
	Hot Work	Best Practice	X	N/A	*	Every 3 years	
	Lock Out Tag Out	Best Practice	X	N/A	*	Every 3 years	
	Fire Extinguisher Training	Fire Code Construction Projects	X	X	X	Every 3 years	
	AODA	Accessibility for Ontarians with Disabilities Act	x	x	x	Every 3 years	
	Health and Safety Representative	Best Practice	N/A	*	*	None	
	Infection Control During Construction of Healthcare Faciliites (Part 1 and 2)	Best Practice	*	*	*	None	

FORM INDEX

The following A-Series forms are the controlled health and safety forms available through the Corfix application and are used by workers, supervisors, and designated personnel to support the implementation and maintenance of the Frecon Safety Program.

Form No.	Form Name	Responsibility	Frequency
DAILY WORK PLANNING			
A-001	Daily Field Level Hazard Assessment	Supervisor	Daily and whenever conditions change
A-002	Site Orientation	Supervisor	Upon Arrival
A-003	Safety / Toolbox Talk	Supervisor	Weekly
SAFETY RECORDS			
A-004	Mobilization Checklist	Supervisor	Jobsite Start Up
A-005	Quarterly JHSC Meeting Minutes	Management and Worker Representative / JHSC	Quarterly
A-006	Posters On Site Checklist	Supervisor	Annually
A-007	Site Supervisor Designated Assistant	Management	As Required
A-008	Asset Maintenance and Repair Record	Maintenance Personnel	As Scheduled
INSPECTIONS			
A-009	Weekly Supervisor Site Inspection	Supervisor	Weekly
A-010	Monthly H&S Rep / JHSC Inspection	Health & Safety Rep / JHSC	Monthly
A-011	Safety Manager Site Inspection	Risk & Safety Manager	Monthly
A-012	Quarterly First Aid Kit Inspection	Designated First Aider	Quarterly
A-013	Fall Protection PPE Inspection	Any Worker	Prior to use
A-014	Vehicle Inspection	Vehicle Operator	Prior to use
A-015	Pre-Use Aerial / Scissor Lift Inspection	Equipment Operator	Prior to use
A-016	Pre-Use Telehandler Inspection	Equipment Operator	Prior to use
A-017	Pre-Use Heavy Equipment Inspection	Equipment Operator	Prior to use

INCIDENT REPORTING & INVESTIGATION			
A-018	Accident / Incident Report	Any Worker	Immediately following an incident
A-019	Incident Investigation Report	Risk & Safety Manager	Immediately following an incident
A-020	Safety Warning	Supervisor	Immediately following an incident
A-021	Injury Treatment Record	Any Worker	Immediately following an incident
HIGH-RISK FORMS			
A-022	Confined Space Entry Permit	Entry Supervisor	Prior to commencing work
A-023	Confined Space Entry Log	Attendant	During confined space entry
A-024	Confined Space Coordination Document	Entry Supervisor	Prior to commencing work
A-025	Emergency Response Drill Record	Designated Safety Rep	Annually
A-026	Hot Work Permit	Supervisor	Prior to welding, cutting, grinding, or other hot work activities
A-027	Fire Protection / Spill Kit Report	Any Worker	Immediately following an incident
A-028	Utility Strike Report	Any Worker	Immediately following an incident

Unless otherwise specified, completed forms shall be retained in accordance with company document control and record retention requirements.

MANUAL HISTORY

DOCUMENT	DATE	APPROVAL
2026.02	June 8, 2026	Douglas Drevniok
2026.01	February 2, 2026	Douglas Drevniok
2025.01	February 10, 2025	Douglas Drevniok
2024.01	January 31, 2024	Dean Drevniok
2023.02	July 3, 2023	Dean Drevniok
2023.01	March 10, 2023	Dean Drevniok
2022.01	January 2, 2022	Dean Drevniok
2021.01	January 18, 2021	Dean Drevniok
2020.02	October 30, 2020	Dean Drevniok
2020.01	January 20, 2020	Dean Drevniok
2019.01	February 18, 2019	Dean Drevniok
2018.01	February 8, 2018	Dean Drevniok
2017.01	January 17, 2017	Dean Drevniok
2016.01	March 14, 2016	Dean Drevniok
2015.01	January 22, 2015	Dean Drevniok
2014.01	January 21, 2014	Dean Drevniok
2013.01	April 30, 2013	Dean Drevniok
2012.01	April 30, 2012	Dean Drevniok
2011.01	April 11, 2011	Dean Drevniok
2010.01	April 18, 2010	Dean Drevniok
2009.01	April 30, 2009	Dean Drevniok
2008.01	April 30, 2008	Dean Drevniok
2007.02	October 6, 2007	Dean Drevniok
2007.01	May 6, 2007	Dean Drevniok
2006.01	March 11, 2006	Dean Drevniok
2005.01	April 11, 2005	Dean Drevniok
2004.01	March 2, 2004	Dean Drevniok
2003.01	February 2, 2003	Dean Drevniok
2002.01	February 2, 2002	Dean Drevniok