



This Safety Management System has been developed in consultation with senior management and the WSH Representative of Shreem Systems & Solutions Pvt. Ltd.

*This written Safety Management System has had the consultation of the following workers at the workplace:*

Name	Signature	Position	Date

Safety Management System Amendments	Date

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### 1.1 COMPANY SAFETY AND HEALTH POLICY

Scope: Applies to all workers, contracted employers and self-employed persons  
Reference(s): MB: Workplace Safety and Health Act, Section 4(1), (2), 4.1, 5, 7.4(5) (d)  
SK: Occupational Health & Safety Regulations 1996 Part III Sections 12, 13, 14,22

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Shreem Systems & Solutions Pvt. Ltd. recognizes the importance of Health & Safety policy & procedures and is committed to protecting employees, clients, property, and the public. In order to prevent any kind of loss/damages and to accomplish our commitment to this policy, we will comply with all applicable federal and provincial government regulations, laws, and industry/client standards and we will strive to control all damages/loss occurred at all worksites.

The safety and health of the employees of Shreem Systems & Solutions Pvt Ltd is of vital importance. Safety is a condition of employment with our company and shall not be sacrificed for the sake of expediency.

Our management is committed to address this activity in order to minimize the risk to employees, facilities, and with clients. Shreem systems & Solutions Pvt Ltd.(SSPL) accepts the responsibility for leadership of the Health & Safety relevant program and for developing the proper attitudes towards program in ourselves and those we supervise. We will also ensure that all operations are performed to acceptable standards to protect the health and safety of all involved.

Proper training, safe work procedures, and written policies will be made available to all employees to ensure a safe workplace. The company welcomes new ideas and encourages individuals in the organization to provide feedback.

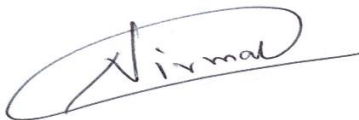
We expect all employees to support and participate in the safe work procedure program and reporting program and will not tolerate disregard for regulations, rules and policies. Employees are responsible for following safe work procedures; obeying all rules and regulations; and for informing supervisors of unsafe work conditions.

Through management commitment and active participation from everyone involved at Shreem Systems & Solutions Pvt. Ltd, a safe workplace can be achieved.

As outlined in our company manual, safety is a shared responsibility by all employees and shall be an integral component of work activities – together we can create a positive safety culture.

### POLICY REVIEW

Shreem Systems & Solutions Pvt Ltd.(SSPL) and the WSH Representative will review the effectiveness of this policy and all components of the safety management system in its entirety every three years at a minimum.



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Nirmal Thakar,  
President

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19/05/2022

Revision Date

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## **1.2 RESPONSIBILITIES FOR WORKPLACE SAFETY AND HEALTH**

Scope: Applies to all workers, volunteers, contracted or self-employed workers in our workplace

Reference(s): Workplace Safety and Health Act, Section 4(1), (2), 4.1, 5, 7.4(5) (d)

SK: Saskatchewan Employment Act 2014, Part III, Division 3 Saskatchewan Occupational Health and Safety Regulation 1996 , Part 3 Section 12-22

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This Safety Management System expresses the commitment of Shreem Systems & Solutions Pvt. Ltd. in ensuring the safety, health and wellbeing of all our workers and any others who may be affected by our work.

### **OBJECTIVES**

1. To strive to ensure responsibility and accountability for safety, health and the environment are clearly defined, and establish and communicate clear accountability for every stakeholder so that Shreem Systems & Solutions Pvt. Ltd. maintains a healthy and vibrant Internal Responsibility System.
2. To acknowledge that:
  - a. Safety, health and well being is the fundamental right of every person affected by our work. To that end, Shreem Systems & Solutions Pvt. Ltd. has developed a comprehensive safety management system, because it's the right thing to do for our company and for all our workers.
  - b. Employers, supervisors, workers, and contracted and self-employed persons are legally responsible for safety and health in the workplace and therefore will be held accountable.
  - c. The greater the authority, the greater the responsibilities for safety and health in the workplace.
  - d. Employers and workers must work cooperatively together to identify, assess and resolve safety and health concerns to ensure that everyone returns home safe at the end of the day and that this company remains vibrant and viable.

**SAFE WORK IS EVERYONE'S RESPONSIBILITY.**

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### **1.2.1 RESPONSIBILITIES OF EMPLOYER**

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We acknowledge that a safe and healthy workplace is a key objective of all well-run organizations. It does not happen by chance, but rather from diligent focus on established goals and objectives. Management must lead the way by demonstrating commitment and providing the required resources. We therefore accept the following responsibilities:

1. To provide and maintain a safe workplace, tools and equipment to ensure, so far as is reasonably practicable, the safety and health of workers and the environment.
2. Assign definite safety and health responsibilities to individuals to meet the safety, health and environmental standards of the company.
3. Ensure supervisors are familiar with their legal duties for safe work and are competent due to their experience, training and knowledge to ensure work is performed in a safe manner.
4. To ensure a system is in place to acquire the necessary documentation within the Safety Management System (SMS) and retention for due diligence.
5. Ensure workers have the knowledge, education, training, and supervision to perform their jobs in a manner that protects the safety and health of all. Specifically, to ensure that for skill-based tasks, workers are trained by a competent person in a manner that ensures they can prove competency in performing the task safely.
6. Ensure that workers are acquainted with all reasonably foreseeable hazards and understand the safe way of doing work.
7. Ensure an ongoing system to identify existing and potential hazards to workers, equipment, property and the environment, including interim and completed corrective actions to eliminate, reduce, or control workplace hazards.
8. Develop the required Safe Work Procedures for the work that is performed at the workplace and ensure that Safe Work Procedures are readily available to workers and that they are enforced consistently.
9. Ensure workers are provided with personal protective equipment and are familiar with its use, care and limitations.
10. Ensure an inspection program is developed and implemented so that the workplace, work processes, and Safety Management System itself are monitored on a regular basis.
11. Establish and implement procedures to report and investigate workplace incidents, such as injuries, near misses and work refusals so that root causes are identified and controlled.
12. Establish and implement criteria for evaluating and selecting contracted employers and self-employed persons, so they meet or exceed Shreem Systems & Solutions Pvt. Ltd. safety requirements.
13. Ensure Emergency Response Plans are developed and communicated for credible emergencies and that the resources required to deal with those emergencies are readily available. Including transportation to the nearest medical treatment facility.
14. Ensure that a Workplace Safety and Health (WSH) Representative is established and cooperate with them regarding the duties with which they are charged.
15. Co-operate with any other person exercising a duty imposed by applicable Safety and Health regulatory requirements.
16. Provide an accessible copy of all applicable regulatory requirements.
17. Ensure the company Safety Management System is communicated and enforced.
18. Ensure workers are not subjected to or participate in harassment or violence in the workplace.
19. Ensure workers are trained and made aware of all their basic rights.

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## 1.2.2 RESPONSIBILITIES OF SUPERVISORS

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The employer has designated a Supervisor to carry out the duties and responsibilities, not only of the employer but of a Supervisor as well.

We acknowledge that a Supervisor is any person who has direct authority over a worker(s) and is in charge of the workplace. They play a critical role in the safety of our workplace. In fact, Supervisors can be one of the most influential forces in a worker's life. Therefore, Supervisors recognise and accept their responsibility to:

1. Take all precautions necessary to protect the safety and health of workers under their supervision, and any others who may be affected by our work including:
  - i. To enforce compliance with all company policies and procedures;
  - ii. To implement temporary corrective actions to control hazards;
  - iii. To correct any unsafe condition or stop work until safe conditions are restored.
2. Ensure that required safety and health documentation is completed correctly, maintained for the work being performed, and readily available to workers.
3. Participate in the investigation of incidents, near misses and work refusals in consultation with management and/or the Workplace Safety and Health (WSH) Representative, and ensure root causes are identified and corrected.
4. Conduct informal and regular formal inspections in all designated areas and ensure that corrective actions are taken and communicated to affected workers.
5. Ensure regular scheduled safety meetings are held with workers to reinforce our safety standards and culture. Safety meetings are to include relevant safety and health topics and meeting records are to be maintained. Safety meetings may be held more frequently if work changes, new hazards are introduced or if an incident occurs.
9. Ensure all workers under their supervision:
  - i. Have received a company safety orientation, have been trained in applicable Safe Work Practices & Safe Work Procedures in a manner that ensures they can provide the training provided.
  - ii. Understand the company's agreements and expectations for safety before beginning work;
  - iii. Follow all company Safe Work Practices & Safe Work Procedures for work undertaken;
  - iv. Understand the safe way of doing work;
  - v. Use all Personal Protective Equipment (PPE) where supplied and required for their protection;
  - vi. Are advised of all known and reasonably foreseeable risks to safety and health in the areas they are performing work;
  - vii. Immediately report all known or perceived hazards, near misses, and incidents.
10. Ensure hazard and incident reports are completed, and that root causes are identified, controlled and communicated.
11. That adequate time is allocated to ensure a formal safety management system (documented).
12. To lead by example, demonstrate safe work and environmental practices, including wearing all PPE and maintaining an orderly work site (housekeeping).
13. Know how to safely handle, store, produce and/or dispose of a chemical or biological substance
14. Understand and implement emergency procedures
15. Ensure workers under their direct supervision are not exposed to harassment or violence at their workplace.

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### 1.2.3 RESPONSIBILITIES OF WORKERS

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Every day, workers on the front line are face to face with the various aspects of our work and associated hazards. As workers often know the work best, they contribute greatly to the overall safety of our workplace and therefore must take their responsibilities seriously.

All workers must;

1. Take reasonable care to protect their safety and health and the safety and health of other persons who may be affected by their acts or omissions at work.
2. Understand and comply with all company safety agreements, policies and procedures. Workers are responsible to talk to their supervisor if there is anything, they are unclear of. Workers shall not undertake work if they are unsure of how to perform the work safely.
3. Report all hazards, near misses, unsafe acts, conditions and incidents to their supervisor immediately.
4. Follow applicable Safe Work Procedures and Safe Work Practices.
5. Wear and use all required PPE, devices and specified work clothing for the work being performed as trained to do so. Ensure items are well maintained and in good working condition.
6. Participate in safety and health activities such as inspections of their work area, equipment and tools.
7. Ensure tools, equipment and all work items provided are well maintained and in good working condition.
8. Immediately contact their supervisor if unsure of how to safely perform any type of work.
9. Consult and cooperate with the Workplace Safety and Health Representative or any other person exercising a duty imposed by applicable workplace safety and health regulatory requirements.
10. Refrain from causing or participating in the harassment or violence of another while at work.

#### General duties of workers

3-10 Every worker while at work shall:

- (a) take reasonable care to protect his or her health and safety and the health and safety of other workers who may be affected by his or her acts or omissions;
- (b) refrain from causing or participating in the harassment of another worker;
- (c) cooperate with any other person exercising a duty imposed by this Part or the regulations made pursuant to this Part; and
- (d) comply with this Part and the regulations made pursuant to this Part.



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## **2.1 HAZARD IDENTIFICATION, COMMUNICATION & CONTROL POLICY**

Scope: Applies to all Workers, Contracted Employers and Self-Employed Persons

Reference(s): Workplace Safety and Health Act, Section 4(2) a, 7.4(5) b; MR 217/2006, Part 2.1(1), (2), (3),  
2.1.1

**SK: SK Occupational Health and Safety Regulations 1996 as amended, Section 22 (b)**

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### **OBJECTIVES**

Shreem Systems & Solutions Pvt. Ltd. is committed to the control of loss to people, property, and the environment. One of the ways this will be achieved is through ongoing identification, communication and control of known and potential hazards. The company will maintain a system that will strive to:

1. Identify, assess, correct and communicate hazards, so far as is reasonable and practicable.
2. Use regular hazard assessments to assist in the selection of tools and equipment and determine how work will be completed safely.

### **POLICY**

1. Shreem Systems & Solutions Pvt. Ltd. will implement a system to identify existing and potential hazards including measures to reduce, eliminate or control those hazards.
2. Shreem Systems & Solutions Pvt. Ltd. will ensure all workers are advised of known and reasonably foreseeable risks to safety and health in the area that they are performing work.
3. All workplace hazards, near misses and dangerous occurrences that result in, or have the potential to result in personal injury, property, process or environmental damage, must be reported immediately to a supervisor.
4. Shreem Systems & Solutions Pvt. Ltd. will strive to, where reasonably practicable, eliminate or control risks through the design of the workplace, the design of the work process or the use of engineering controls. Any remaining risk will be reduced, so far as reasonably practicable, by methods such as Safe Work Procedures, training and the use of PPE.
5. Shreem Systems & Solutions Pvt. Ltd. will maintain an inventory of critical tasks and through a hazard ranking system, will determine whether low, medium or high risks to safety and health exist. Refer to the Inventory of Critical Tasks.
6. Job Hazard Analyses will be performed for all jobs and equipment that have the potential to cause loss to workers, equipment, property or the environment. From the job hazard analyses, Safe Work Procedures shall be developed and implemented.
7. Conditions, equipment and workers may change.
  - a. New worksites must be assessed for hazards which must be controlled, and safe work must be planned.
  - b. Formal and informal inspections shall be performed in all work areas as per the Company Inspection Policy
8. Information regarding existing hazards must be communicated to all workers so they know what to do to prevent injuries and incidents.
9. Shreem Systems & Solutions Pvt. Ltd. ensure that hazard controls are appropriate and maintain records of corrective action and follow-up.

**2.1.1 HAZARD ASSESSMENT & CONTROL PROCEDURE AND GUIDELINE**

Scope: Applies to all Workers, Contracted Employers and Self-Employed Persons

Reference(s): Workplace Safety and Health Act, Section 4(2) a, 7.4(5) b; MR 217/2006, Part 2.1(1), (2), (3), 2.1.1

**SK: SK Occupational Health and Safety Regulations 1996 as amended, Section 22 (b)**

**Hazard:** is any source of potential damage, harm or adverse health effects on something or someone.

HAZARD CATEGORIES					
Biological	Chemical	Ergonomic	Physical	Psychosocial	Safety
Living organisms, like bacteria, viruses, insects, plants, birds, animals, humans, mold, fungi etc.	Can appear as gases, vapors, liquids, solids, dust, fume or mist. Depends on the physical, chemical and toxic properties of the chemical.	Poorly designed equipment or work process that place undue strain on the body; Repetitive movements, awkward postures, sustained postures, etc.	Are forms of energy or force, like radiation, magnetic fields, pressure/temp extremes, noise, vibration, electricity, etc.	Can range from risks of crime/violence/harassment to stress/pressure and mental health	Result of contact; Slip/trip hazards, machine guarding, equipment malfunctions or breakdowns, etc.

**The Hazard Identification, Assessment and Control Process Overview**

1. A Critical Task Inventory must be created and reviewed regularly.
2. Critical tasks are to be risk ranked and Safe Work Procedures are to be created for all high-risk tasks.
3. In some instances, there will be a job that has not previously been performed or a Safe Work Procedure (SWP) has not yet been created. In this case, a Job Hazard Analysis (JHA) will be required to be performed/completed.
4. From the Job Hazard Analysis, Safe Work Practices and Safe Work Procedures will be developed and implemented.
5. Supervisors (with the participation of the WSH Representative, and worker input) will be responsible for leading Job Hazard Analyses and development of Safe Work Procedures.
6. Job Hazard Analysis and Safe Job Plans should be completed whenever a jobs or tasks arises that are complex or non routine.
7. When hazards, near misses and dangerous occurrences are reported or identified, the worker will address immediately if safe to do so. The worker will inform the supervisor, and if required, the supervisor who is ultimately responsible to ensure appropriate corrective action, will assist with the hazard assessment and control measures.
8. Hazard Reports will be sent to management and to the WSH Representative for their review.
9. Daily Hazard Assessments: Identify the hazard, the controls and the risk rank.

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## The Hazard Identification, Assessment and Control Process

1. **Identify the people** required to complete the hazard assessment and to implement controls. Who does the work? Who works in the area? Who are the supervisors?
2. Tour the area, assess the possible hazards and **develop an Inventory of Critical Tasks** such as:
  - a. Jobs that have a history of incidents and injuries,
  - b. All jobs involving sources of energy,
  - c. Jobs with potential for incidents or injuries,
  - d. New jobs or equipment,
  - e. Jobs involving inexperienced workers,
  - f. Routine jobs that may breed complacency,
  - g. Keep asking “what if?” and “what’s the worst that could happen?” in all discussions.
3. **Rank the hazards** with the risk ranking matrix to identify which ones most urgently require controls. Hazard ranking is done by assessing the severity of all incidents that could arise from the hazard, and the probability of the incident occurring based on the degree of exposure, refer to **2.1.2 Hazard Ranking Matrix**.
4. **Conduct a Job Hazard Analysis** for all high and moderate risk jobs. This involves:
  - a. Breaking down each job into its steps, as detailed as possible.
  - b. Analyzing the hazards present at each step.
  - c. Developing controls for those hazards.
5. **Write Safe Work Procedures based on each analysis.**
  - a. Testing, revising, and implementing the written work procedures.
  - b. Regularly reviewing each job procedure and keeping it current.
6. **Develop and implement controls** wherever there is the potential for harm; use the Hierarchy of Controls:
  - a. **First Priority: Control at the Source**
    - i. **Elimination** - often the best way of protecting workers.
      - Does the task need to be done? e.g. the use of mechanical device instead of manual lifting.
    - ii. **Substitution** – replace hazardous substances with something less dangerous.
      - Can something else be used that has less risk? e.g. reduction in the size and weight of an item, using water based instead of solvent based paint.
    - iii. **Engineering Controls** – involve the design of the workplace and its related processes.
      - Can equipment be used to reduce the risk?
      - Can the layout of the workplace, workstations, work processes, and jobs be redesigned to prevent hazards? e.g. local exhaust ventilation, guarding, lighting, enclosures
    - iv. **Isolation** – isolating, containing or enclosing the hazard is often used to control chemical and biological hazards.
      - Can distance/barriers/guards be used to prevent worker exposure to the hazard? e.g. access controls, distance, engineering controls, time.

v. **Automation** – dangerous processes can sometimes be automated or mechanized.

**b. Second Priority: Control Along the Path**

i. **Barriers** – a hazard can be blocked.

- Equipment guards
- Lockout systems

ii. **Absorption** – baffles can block or absorb noise.

iii. **Dilution** – e.g. general (dilution) ventilation might dilute the concentration of a hazardous gas with clean, tempered air from the outside.

- Local exhaust ventilation can remove toxic vapours, dusts and fumes at the point of origin.

iv. **Relocation** – e.g. move a dangerous work process to a less populated area of the workplace.

**c. Third Priority: Control at the Level of the Worker**

**i. Implement Safe Work Procedures**

- Can procedures be used to specify the safe way of doing work to reduce risks? e.g. require permits for specific work, develop checklists and process maps and conduct JHA.
- Ensure workers can apply the training provided to protect the safety and health of themselves and others.

ii. **Education and training** - train workers in:

- Hazard identification and assessment,
- How serious the harm can be?
- How to reduce exposure,
- How to prevent harm,
- Safe Work Practices and Safe Work Procedures,
- What to do during an incident or emergency,

**iii. Require personal protective equipment (PPE)**

- Is it suitable and sufficient for the task?
- Train workers on the use, care and limitations of PPE.

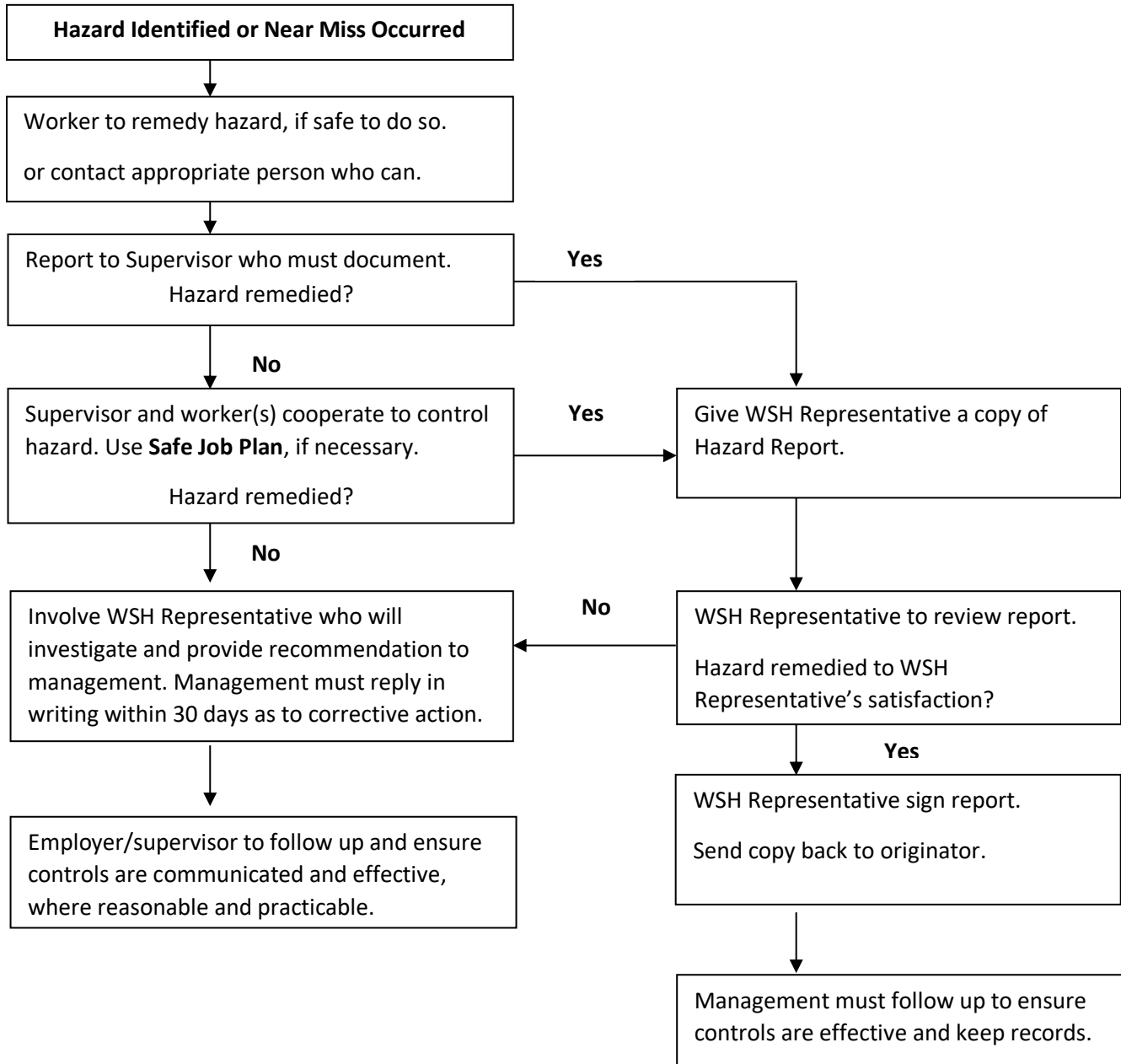
**Controls at the level of the worker usually does not remove the risk posed by a hazard. It only reduces the risk of the hazard injuring the worker and lessens the potential seriousness of an injury. Personal Protective Equipment is the least effective method and should not be relied upon solely. It should be used in conjunction with other controls such as engineering and substitution controls.**

**7. Summarize the controls identified in the JHA into Safe Work Procedures.**

- Keep the content as simple as possible.
- Use bullet points for easy reading and comprehension.

8. ***Inventory of worker education and training requirements.***
  - a. Train workers in Safe Work Practices and Safe Work Procedures and the use of Protective Personal Equipment (PPE).
  - b. Maintain records of training.
9. ***Make critical safety procedures/equipment part of standard operating procedures.***
  - e.g. lockout, confined space entry, etc.
10. ***Incorporate Safe Work Practices and Safe Work Procedures into regular workplace inspections.***
  - a. Ensure that the controls are effective.
  - b. Make adjustments where necessary.
  - c. Be open to and encourage feedback from workers.
  - d. Review the JHA during all incident investigations. At what step did the event occur?
11. ***Create a system to track:***
  - a. Critical job inventories
  - b. Job Hazard Analysis (JHA), Safe Work Practices & Safe Work Procedures: dates of completion, review and revisions
  - c. Inspections, deficiencies and remedial action
  - d. Worker education and training
  - e. Enforcement of Safe Work Practices, Safe Work Procedures and of company rules
12. ***Conduct regular and ongoing Hazard Assessments.***

**HAZARD/NEAR MISS REPORTING FLOW CHART**



**2.1.2 HAZARD RANKING MATRIX**

**RISK = Probability (of the hazard occurring) X Severity (potential loss)**

SEVERITY (seriousness of the potential loss)		CONSIDER
1.	<ul style="list-style-type: none"> <li>Death or permanent injury</li> <li>Extensive loss of plant</li> <li>Prosecution</li> </ul>	<ul style="list-style-type: none"> <li>The seriousness of the potential harm</li> <li>Near misses in the past that could have been much more serious</li> <li>How many people could be hurt</li> <li>How quickly danger could arise (warning time)</li> <li>The work environment</li> <li>The tools and materials being used</li> <li>The task – specific job function</li> <li>The environment and their interactions</li> <li>What additional hazards could be caused by injuries and emergencies</li> <li>Chronic effects</li> </ul>
2.	<ul style="list-style-type: none"> <li>Serious injury, illness, or major property damage</li> <li>Temporary disability</li> <li>Some damage to plant, equipment/ Improvement notice</li> </ul>	
	<ul style="list-style-type: none"> <li>Non-serious lost time injury illness or minor property damage</li> </ul>	
4	<ul style="list-style-type: none"> <li>Minor injury/illness with no lost time</li> <li>Minor disruption to plant equipment</li> </ul>	
5.	<ul style="list-style-type: none"> <li>Negligible violation of standard/process</li> <li>No injury, illness, or property damage</li> </ul>	

Probability (probability of the hazard occurring)		CONSIDER
<b>A</b>	<ul style="list-style-type: none"> <li>Probable</li> <li>To occur immediately</li> </ul>	<ul style="list-style-type: none"> <li>The probability of the hazard actually causing harm</li> <li>The number of workers exposed to the hazard</li> <li>Frequency of exposure to the hazard</li> <li>Experience of the workers that are exposed</li> <li>Hazard monitoring and control requirements</li> <li>How well current controls or monitoring is working?</li> <li>Management – organization and operation of the workplace, productivity schedule etc.</li> </ul>
<b>B</b>	<ul style="list-style-type: none"> <li>Reasonably probable</li> <li>Likely to occur within a short period of time</li> </ul>	
<b>C</b>	<ul style="list-style-type: none"> <li>Remote</li> <li>May occur in time</li> </ul>	
<b>D</b>	<ul style="list-style-type: none"> <li>Once or few times a year/or over the lifetime of the project</li> <li>Extremely remote</li> </ul>	

**Probability**

	A	B	C	D
1				
2				
3				
4				
5				

<b>HAZARD RANKING AND CONTROL</b>	
<b>High Risk</b>	<i>high probability of loss</i>
<b>Medium Risk</b>	<i>could lead to loss</i>
<b>Low Risk</b>	<i>unlikely to lead to loss</i>

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### 2.1.3 REFUSALS TO WORK POLICY AND PROCEDURE

Scope: Applies to all Workers, Contracted Employers and Self-Employed Persons

Reference(s): MB: Workplace Safety and Health Act, Section 43

SK: Saskatchewan Employment Act 2014 DIVISION 5 Right to Refuse Dangerous Work;  
Discriminatory Action Right to Refuse Dangerous Work 3-31-37

\*\* Title is jurisdiction dependent: | SK Occupational Health and Safety Officer | MB Safety and Health Officer

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#### DEFINITION

Dangerous work: means work involving safety and health risks that are not normal for the job, or a situation for which the worker is not properly trained, equipped, or experienced.

Shreem Systems & Solutions Pvt. Ltd. recognizes that it is the right of every individual to refuse work where they have reasonable grounds to believe the work is dangerous to the safety and health of themselves or others, therefore:

1. When hazards involving safety and health risks are encountered, which are not normal for the job, they shall be reported to the supervisor immediately in order to prevent injury, illness, other loss.
2. Should a worker refuse work, they will be temporarily assigned to alternate work while the situation is being remedied. They shall remain at the workplace for normal working hours unless given permission to leave by their supervisor.

#### PROCEDURES FOR WORK REFUSAL

##### Stage 1

1. The worker must immediately report to the supervisor their intention to refuse work and must state the reason(s).
2. The refusing worker and their supervisor must attempt to resolve the concern. If the supervisor resolves the matter to the worker's satisfaction, the worker shall go back to work.
3. The supervisor and the worker shall both complete a Work Refusal Report and a copy shall be sent to the WSH Representative for review.
4. If the work refusal cannot be resolved at this level, go to Stage 2.

NOTE: When a worker has refused to work or do particular work, the employer shall not request or assign another worker to do the work unless:

- a) The employer has advised the worker, in writing, of
  - i. The first worker's refusal,
  - ii. The reason(s) for the refusal,
  - iii. The other worker's right to refuse dangerous work under this section, and
  - iv. The reason why, in the opinion of the employer, the work does not constitute a danger to the safety or health of the other worker, another worker, or any person;
- b) Where practicable, the first worker has advised the other worker of
  - i. The first worker's refusal,
  - ii. The reason(s) for the refusal; and
  - iii. The area in question has been controlled and then inspected by the WSH Representative or another worker of the refusing workers choice.

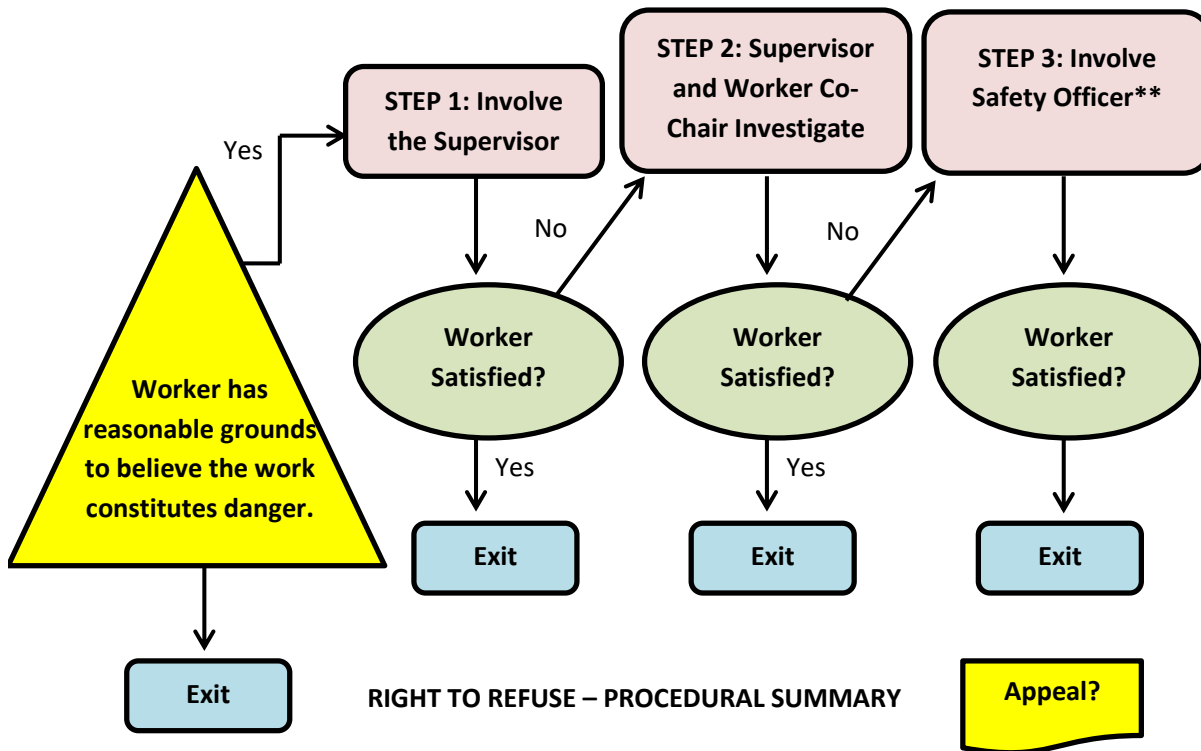


**Stage 2**

1. WSH Representative, or a person who represents workers, must be involved.
2. Working with the supervisor and the refusing worker, the WSH Representative must make every effort to resolve the matter internally. If the matter is resolved to the worker's satisfaction, the worker shall go back to work.
3. The WSH Representative, the supervisor and the worker shall complete a Work Refusal Report and a copy shall be sent the WSH Representative for review.
4. If the work refusal cannot be resolved at this level, go to Stage 3.

**Stage 3**

1. Any of the persons present during the inspection in Stage 2 may notify a Safety Officer\*\* of the refusal to work.
2. The Safety Officer\*\* will investigate the matter and decide whether the refused job or task constitutes a danger to the safety and health of the worker, or any other worker or person at the workplace.
3. The Safety Officer\*\* will provide a written decision. Anyone directly affected by the decision may appeal it with the Provincial WSH legislative body.



### **3.1 SAFE WORK PRACTICES**

Scope: Applies to all workers, contracted employers and self-employed persons

Reference(s): MB: Workplace Safety and Health Act, Section 4(2) a, 7.4(5) b; MR 217/2006, Part 2.1(1), (2), (3), 2.1.1

SK: Occupational Health and Safety Regulations 1996 , Section 22 (b)

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**Safe Work Practices:** Are general Do's and Don'ts for a tool or piece of equipment. Practices are ways to complete a task with minimum risk to people, property, process and the environment. They are based on legislation, industry standards and best practices. Examples include of ladders, specific tools, equipment and materials. (e.g. use of a step ladder, safe care and use of hearing protection, working around powered mobile equipment, etc.).

#### **POLICY**

1. Safe Work Practices must be developed in writing and be specific to the work undertaken by the company.
2. Safe Work Practices must have the consultation/review of workers proficient in the tasks to ensure that they are effective.
3. Shreem Systems & Solutions Pvt. Ltd. will strive to ensure that all workers are trained and educated in applicable safe and responsible work practices.
4. Safe Work Practices must be reviewed whenever there are related incidents, near misses or changes in equipment or operations.
5. Changes or modifications to Safe Work Practices must be kept in company records to demonstrate on-going due diligence.
6. Prior to the development of Safe Work Practices, wherever reasonable and practicable, risks to the safety and health of workers will be eliminated or controlled through one or a combination of the following:
  - a. The design of the workplace,
  - b. the work process, or
  - c. the use of engineering controls

#### **4.1 SAFE JOB PROCEDURES**

Scope: Applies to all workers, contracted employers and self-employed persons

Reference(s): MB: Workplace Safety and Health Act, Section 4(2) a, 7.4(5) b; MR 217/2006, Part 2.1(1), (2), (3), 2.1.1

**SK: SK Occupational Health and Safety Regulation 1996 as amended Part III Sections 12(a)(b)(c), 13(b), 22(1)(g)**

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**Safe Job Procedures:** *Are detailed, step by step, chronological instructions on how to complete a task safely and efficiently with minimum risk to people, property, process and the environment. They are written specifically for the type of work/equipment/tasks and include legislation, industry standards and best practice. Examples include specific equipment and processes. (e.g. installing panels, operating scissor lifts, locking out electrical breakers, etc.).*

#### **POLICY:**

1. SJPs are to be developed specifically for the work that takes place at our workplace. (Refer to the Critical Task List for high-risk jobs). SWPs should be created in consultation with supervisors, the Workplace Safety and Health Representative and workers performing the work.
2. Workers must be trained in the SJP's by a competent person in a manner that ensures they can apply the training provided. (The greater the risk associated with the SWP, the greater the safety and health measures required).
3. SJPs must be reviewed at a minimum of every three years, or whenever there are related incidents, near misses or changes in equipment, operations or legislation. Any changes or modifications to SJPs are to be kept in the company records to demonstrate ongoing due diligence.
4. SJPs must be readily available to all workers and used as an on-job training tool that ensures workers are competent in performing the procedures.
5. Supervisors are to perform documented competency observations of workers demonstrating the safe way of doing work. The SJPs are to be followed and where necessary, the progressive discipline policy will be implemented.
6. Workers are to follow the SWPs for which they are trained in and contact their supervisor when unsure about how to work safely.

#### **SJPs Development Procedure:**

1. Identify the workers who have experience in performing the task, include a supervisor and WSH Representative
2. Review applicable legislation, manufacturer's specifications, industry standards and best practices to ensure compliance. Reference all relevant documents on SJPs.
3. Review and summarize the information in each step that has been identified through the Job Hazard Analysis and include the hazard controls to be implemented.
4. Use the template to write the SJPs with input from the people identified in Step 1. Ensuring to document the names of workers and the WSH Representative who took part in development/review.

5. Observe the task while workers are following the SJPs to ensure the document is complete.
6. Train workers on SJPs to ensure competency for the job task.
7. Ensure that SJPs are readily available and review with workers as required.

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## 5.1 COMPANY SAFETY AND HEALTH RULES & AGREEMENT

Scope: Applies to all workers, contracted employers and self-employed persons

Reference(s): MB: Workplace Safety and Health Act, Section 4(1), (2), 4.1, 5, 7.4(5) (d)

SK: Saskatchewan Employment Act 2014, Parts II, section

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The Safety Rules and Agreement has been developed in consultation with stakeholders at our workplace and represents our collective “agreements” to each other and to the company itself so that everyone affected by our work and our company are protected from workplace safety related loss. They represent not only our expressed understanding of safety requirements, but our moral obligations to each other with the goal that every person returns home safe to their family at the end of every workday. In the best interests of all stakeholders, the following are a condition of employment; violation may result in disciplinary action up to and including termination.

### OUR GENERAL SAFETY RULES ARE:

1. **Alcohol, drugs at risk for causing cognitive impairment, firearms, or other weapons** are strictly prohibited. Anyone believed to be in possession of, or under the influence of company prohibited, legal or illegal drugs, will be suspended pending an investigation.
2. **All personal protective equipment provided must be worn and maintained** in a safe and responsible manner. Hard hats and safety footwear are to be worn on ALL sites at all times.
3. **All hazards, near misses, incidents and defective tools, equipment or machines must be reported immediately** to your supervisor.
4. **Use tools, machinery or equipment only if you have been trained and authorized by your supervisor to do so.**
  - a. **Protective devices such as machine guards are to remain securely in place. Removing safety guards or tampering with safety devices** is strictly prohibited.
5. **Lockout procedures** must be strictly followed for all defective tools, equipment and machines as well as repair and maintenance work involving energized sources. This includes electrical, hydraulic, pneumatic, thermal energy and potential. Where lockout is not possible, written Safe Work Procedures must be developed to provide equal or greater protection than the Lockout Procedure itself.
6. **All servicing and repairs** to equipment, machinery and tools must be performed by a qualified worker or authorized service provider. Any alterations or modifications that could impair safe operation are prohibited.
7. **Workers are encouraged to get help** or to use a mechanical lifting device when a lifting task may be more than can be handled safely alone.
8. **Control all sources of ignition** when working with, or adjacent to, flammable and combustible materials such as compressed gasses, gasoline, solvents, and other flammables. Do not cut, grind, weld, or do anything which will produce sparks or open flames within 15 meters of un-protected flammable or combustible materials. **All flammable petroleum fuels** must be stored and dispensed from approved safety containers.
9. **Keep yourself and others clear of overhead loads. Never** stand, walk, or work under a suspended load (e.g. forklift, crane), or move a load over the heads of workers.

10. Wearing loose clothing, dangling neckwear or jewelry around equipment and machinery is prohibited. All workers with long hair must tie it back or otherwise secure it from entanglement.
11. Follow instructions, Safe Work Practices and Procedures. If you don't know, ask.

**Before performing any of the following work all workers must receive training and be authorized by their supervisor:**

1. Working at heights over 3 m or over a hazardous environment.
2. Operating powered mobile equipment.
3. Working with or around hoisting and rigging equipment.
4. Performing work in an excavation or confined space.
5. Working alone or in insolation

**Before performing any of the following work all workers must receive/ensure they have the required training, authorized permission, permits and emergency measures implemented:**

1. Performing ground disturbance,
2. Entering an excavation,
3. Entering a confined space,
4. Performing live electrical work,
5. Working within 10 feet of a power line,
6. Erecting scaffold(s).

**OUR SPECIFIC SAFETY AGREEMENTS TO EACH OTHER ARE:**

- 1. Work at Heights.** When working at heights over 3 m or over a hazardous environment, we will make sure:
  - a. We are trained and authorized to perform the work,
  - b. Our fall protection equipment is inspected before each use (guardrails or PPE),
  - c. We keep 6 ft back from the edge of any flat surface area if we are not tied off.
- 2. Powered Mobile Equipment.** When operating powered mobile equipment, we will make sure:
  - a. We are trained and authorized to operate the equipment
  - b. We inspect and document all powered mobile equipment before each use
  - c. To fasten our seatbelt or restraining device and
  - d. To only sit on manufacture designed seats intended for people,
- 3. Work in Confined Space.** When working in confined spaces, we will make sure:
  - a. We are trained and authorized to perform the work,
  - b. All Supervisors and workers understand the definition of confined space and hazardous confined space
  - c. An entry permit is completed prior to work being performed,
  - d. We implement an emergency response plan and rescue procedures in the event of an incident occurring prior to commencing work.,

- e. We use all appropriate safety and personal protective equipment that is necessary to complete the work safely (e.g. atmospheric monitor, full body harness, lifeline, and personal hoisting device),
  - f. The structural integrity of the entrances and exits of the confined space are maintained, and
  - g. A trained and competent standby worker remains present at the entrance of the hazardous confined space
- 4. Working with Energized Sources.** When working with energized sources, we will make sure:
- a. We are trained and authorized,
  - b. The equipment/system is de-energized, locked out and tested prior to work being performed,
  - c. We will use one lock and one key for every person performing work on the job.
- 5. Hoisting and Rigging.** When working with or around hoisting and rigging, we will make sure:
- a) We are trained and authorized,
  - b) All cranes, hoists, and rigging equipment are inspected before each use,
  - c) All persons working with hoisting or rigging equipment fill out the detailed logbooks for each use,
  - d) We never exceed the rated loads clearly marked on the hoists and rigging equipment,
  - e) No person is standing near or directly underneath a hoisted load,
  - f) The use of tagline or clamp device will be used to control the load, and
  - g) No person rides on a load, hook, rigging or bucket attached to a crane or hoist.
- 6. Hazardous Products.** When working with hazardous products, we will make sure:
- a) We are trained and authorized,
  - b) All safety data sheets (SDS) are readily available,
  - c) All product containers have a detailed supplier label or workplace label,
  - d) Products that are decanted have a detailed workplace label identifying the name, hazardous and precautionary statements, and reference to the SDS, and
  - e) All persons who may be exposed to hazardous materials, but are not directly working with hazardous materials, are trained in understanding SDS, labels and the safe use, storage, handling and disposal and emergency and spill procedures.

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## 5.2 ENFORCEMENT & DISCIPLINARY ACTION POLICY

Scope: Applies to all workers, contracted employers and self-employed persons

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### POLICY

Shreem Systems & Solutions Pvt. Ltd. is committed to maintaining a safe, healthy and productive workplace. Behaviour that is incompatible with this objective will be dealt with in a firm, fair, and effective manner. Documentation of all disciplinary action is required.

Management and supervisors recognize that a lack of enforcement of safe and responsible work practice is a lack of complete due diligence and a liability to all stakeholders and the company itself. Therefore, it is the responsibility of management, supervisors and any other person who directs work to enforce our safety standards. Failure to do so may result in disciplinary action being applied to management and supervisors.

The following steps outline the progressive disciplinary process. These steps are not absolute and may vary depending on the nature and severity of the infraction. The principle of progressive discipline is to ensure that the worker is knowledgeable of job requirements, company policies, procedures and expected safety outcomes.

Progressive discipline is as follows:

- Step 1: Documented verbal warning
- Step 2: Written warning
- Step 3: Suspension
- Step 4: Termination of employment

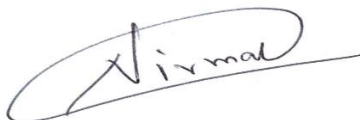
### TERMINATION OF EMPLOYMENT

Termination may occur following a worker committing violations of company safety policies, safety procedures and/or rules after the logical steps for progressive disciplinary action have been taken or immediately following a serious violation.

Some infractions may be grounds for immediate dismissal rather than progressive discipline. These include but are not limited to gross misconduct, theft, violence, endangering the safety of others, and negligence.

### POLICY REVIEW

Shreem Systems & Solutions Pvt. Ltd. and the WSH Representative will review the effectiveness of this policy and all components of the safety management system in its entirety every three years at a minimum.



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Nirmal Thakar,  
President

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03/05/2022

Revision Date



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## 6.1 PERSONAL PROTECTIVE EQUIPMENT (PPE) POLICY

Scope: Applies to all workers, contracted employers and self-employed persons

Reference(s): MB: Workplace Safety and Health Act, Section 4(2) c, 4.1 (a) iii, 5(b); MR 217/2006 Part 6  
SK: Saskatchewan Occupational Health and Safety Regulations, 1996 Sections 13(a), 22(1) c, Part VII

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### POLICY

1. Shreem Systems & Solutions Pvt. Ltd. will strive to ensure that workers are provided with and understand the requirements and importance of PPE to their safety and health while on the job. Workers must understand the proper use, maintenance and limitations of PPE so that the highest degree of safety may be achieved.
2. All PPE must be CSA/ANSI approved and/or meet the standards established for PPE as prescribed by Provincial Legislation(s).
3. PPE is the least effective method and last resort when controlling hazards in the workplace as the hazard itself is not eliminated. Therefore, the company will strive to implement all other possible controls wherever reasonable and practicable.
4. Workers are to provide their own CSA approved safety footwear and hard hat (Construction sites). All other PPE, including PPE designed for specific jobs, will be provided by the company.
5. Workers are required to maintain company issued PPE in good working condition. The company will ensure that all specialty PPE is maintained according to manufacturer's specifications.
6. Where required, signs must be posted in work areas where PPE is mandatory.
7. In the event of an emergency in the workplace, including a spill or discharge of a hazardous substance, exposed workers must wear required PPE.
8. The Company Enforcement Policy will be strictly adhered to for non-compliance regarding the use and requirements for PPE.

### PPE REQUIREMENTS

1. Safety Headwear
  - a. CSA/ANSI approved head protection is required on all construction sites and any other time there is a danger of a head injury. **The head protection must be fluorescent orange or other high visibility color where the visibility of the worker is necessary to protect the health and safety of the worker (SK only)**
    - i. **A retention system must be used to secure the protective headwear where conditions may cause the headwear to dislodge. (SK)**
  - b. CSA approved nonconductive headwear is required where workers are exposed to electrical hazards.
2. Safety Footwear
  - a. Grade 1 CSA approved (green triangle) protective footwear is required on all construction sites and for all tasks where there is risk of injury to the foot.

### 3. Eye and Face Protection

- a. CSA approved safety glasses with side shields or goggles are mandatory whenever workers are subject to materials that may injure the eye, such as flying objects or particles, injurious light or heat rays, chemicals, etc.
- b. Prescription Eyeglasses ARE NOT safety glasses unless they are CSA approved.
- c. Eye protection must also be worn when:
  - i. Working with compressed gasses,
  - ii. Drilling or cutting materials,
  - iii. Operating a chainsaw or a quick cut-off saw, or
  - iv. Any other time there is danger of an eye injury.
- d. CSA approved chemical splash goggles must be worn when:
  - i. Handling any hazardous material that may cause an eye injury,
  - ii. Chemical spraying, or
  - iii. Handling acids or alkali.
- e. CSA approved face shield must be worn if there is a risk of injury to the face. Safety glasses or splash goggles **MUST** also be worn under the face shield to protect the eyes. Face shields must be worn when:
  - i. Grinding (stationary or portable)
  - ii. Handling corrosive chemicals (battery acid).
- f. CSA Approved Welding Helmets must be worn when welding or torch cutting.

### 4. High Visibility Clothing

- a. CSA approved high visibility clothing must be worn when workers:
  - i. are exposed to the risk of injury from a moving vehicle or powered mobile equipment,
  - ii. Are not visible to other persons because of environmental or other conditions, e.g. dust, night, fog, etc.

### 5. Hearing Protection

- a. The company will make hearing protection available for all workers.
- b. Where noise exposure is over 85 dBA, hearing protection is mandatory and must be enforced to prevent workers from suffering hearing loss. Generally, hearing protection should be worn whenever the noise is such that a worker must raise their voice to be heard at a distance of 1 m.

### 6. Fall Protection

- a. CSA approved fall protection is required where workers are in danger of falling:
  - i. More than 3 metres, or

- ii. Into unprotected operating machinery,
  - iii. Into or onto hazardous substances or surfaces, or
  - iv. Into water.
- b. Prior to using fall protection equipment, workers/contractors must be trained in the proper use, maintenance, inspection and limitations of the equipment.
- c. In addition, where there is a risk of drowning, such as workers/contractors working over water:
- i. A coastguard approved personal flotation device (PFD) must be worn
  - ii. Rescue equipment must be available:
    - 1. An appropriately powered boat equipped with a boat hook,
    - 2. A buoyant apparatus attached to a nylon rope, where the rope is not less than 9 mm in diameter and not less than 15 m in length,
    - 3. A notification or signaling device.
  - iii. Ensure a sufficient number of properly equipped and trained rescue personnel are readily available to undertake a rescue in the event one is required.

#### 7. Respiratory Protection

- a. Respiratory equipment must be used wherever there is danger from harmful concentrations of gases, vapours, fumes, mists, dusts, or oxygen deficiency.
- b. Where respiratory equipment is required, it must be selected in accordance with CSA Standard Z94.4-11, Selection, Use and Care of Respirators. Respiratory equipment must be NIOSH approved. The supervisor is responsible for determining the conditions for which a respirator is to be worn, and for ensuring the correct respirator is available for use.
- c. Workers must be trained by a competent person in the proper fit, testing, maintenance, use and cleaning of the equipment and its limitations.
- d. A FIT test (quantitative or qualitative) is required for any employee who through the course of his/her work is required to wear a respirator. This testing is required every 2 years.

#### 8. Hand Protection

- a. Suitable gloves should be worn where materials or conditions may cause damage to hands from:
  - i. Sharp edges, heat, extreme cold, and/or
  - ii. Skin contact with oils, grease, solvents or corrosives.
- b. Gloves should not be worn around machinery with moving parts as the risk of hand injury increases.

#### 9. Arm, Leg and Body Protection

- a. Should be used as appropriate when using equipment such as a chainsaw, etc.

10. Flame Resistant (FR) Coveralls

- a. Flame Resistant coveralls must be worn whenever:
  - i. Required by the client or prime contractor,
  - ii. There is risk of burns from a flash fire,
  - iii. Arc Rated clothing when assessed by a completed arc flash hazard assessment when working with electrical voltages greater than 30 volts. Refer to CSA standard Z462 and NFPA 70E (2018)

**PERSONAL PROTECTIVE EQUIPMENT MATRIX**

<b>PPE</b>	<b>Associated Hazards</b>	<b>Who Will Supply</b>	<b>Examples of Areas Required</b>
1. Safety Headwear	Construction sites, falling objects, lateral (side) impact, exposed energized electrical conductor	<ul style="list-style-type: none"> <li>○ Company</li> <li>○ Worker (only if on construction project site)</li> <li>○ Subcontractor</li> </ul>	At all times as needed by client, on all construction project sites.
2. Safety Footwear	Crushing, falling objects, sharp objects. Hot, corrosive or toxic substances	<ul style="list-style-type: none"> <li>○ Worker</li> <li>○ Company will subsidize</li> <li>○ Company will supply</li> </ul>	At all times in the field.
3. Eye / Face Protection	Flying objects or particles, splashing liquids or molten metal, ultraviolet, visible or infrared radiation	Company	At all times when cutting, grinding, welding, etc.
4. High Visibility Clothing	Moving vehicle or powered mobile equipment. Environmental such as poor lighting, fog, dust	Company	At all times around powered mobile equipment (PME), as required by client
5. Hearing Protection	Noise above 80 dBA Lex	Company	As required.
6. Fall Protection	Working at heights over 3 m over hazardous objects / chemicals / water	Company	As required.
7. Respiratory Protection	Dusts, mists, vapours, fumes, gasses, fibres, oxygen deficiency, biological	Company	As required.
8. Hand Protection	Sharp object, abrasion, chemicals, heat, cold, vibration	Company	As needed.
9. Fire retardant clothing	Hot work, sparks, flames, explosion	Company	As required by client.
10. Arc rated PPE	Arc flash, electrical energy	Company	As required.

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## **7.1 PREVENTATIVE MAINTENANCE**

Scope: Applies to all workers, contracted employers and self-employed persons

Reference(s): MB: Workplace Safety and Health Act, Section 4(2) a; MR 217/2006 Part 16.4, Part 22.3

**SK: Saskatchewan Employment Act 2014 Part II Section 3 Saskatchewan Occupational Health and Safety Regulations 1996 as Amended Part X 156**

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### **POLICY**

It is vital that tools and equipment are inspected, maintained, and kept in good repair. An effective maintenance program will reduce the risk of injuries to workers, damage to equipment environment and lost production. Shreem Systems & Solutions Pvt. Ltd. will maintain equipment and machinery in safe working condition and in accordance with manufacturer's recommendations. Inspection, servicing, and repair will be carried out according to the manufacturer's specifications by qualified service providers. In addition:

1. When a problem is discovered with equipment or tools, workers must lockout the equipment and/or tool, inform other workers and immediately report the malfunction to their supervisor.
2. All workers must regularly check tools, vehicles and equipment informally and formally to ensure they are in safe working order. Any malfunction tools or equipment posing a hazard or requiring repair must be taken out of service and locked out.
3. Records of maintenance and repair work shall be retained for each piece of equipment.
4. Tools and equipment taken out of service for repair or maintenance must be locked out to prevent incidental start-up. Use company Lockout Procedures.

**PREVENTATIVE MAINTENANCE SCHEDULE**

<b>Equipment to Check</b>	<b>When - Frequency</b>	<b>Who</b>
Company Vehicles	Weekly	Drivers
Eyewash Station	Self-Contained - Change Solution and water additive conditioner every 6 months or as per manufacture  Plumbed –Annually ANSI Z358.1	Designated worker  Authorized Service Provider
Emergency Equipment:  <ul style="list-style-type: none"> <li>• Fire Extinguishers</li> <li>• Eyewash station</li> <li>• Smoke Detectors</li> <li>• CO Detectors</li> <li>• Emergency lighting</li> </ul>	Monthly	Office
Fall Protection Equipment	Annually & Pre-use	Authorized Service Provider or Worker
Shop	Monthly	Technicians
Tools	Pre-Use	Technicians
Office Trailer	Weekly	Technicians
Building	Semi Annually	Office
Job Trailers	Weekly & Pre-use – While on site	Technicians
Sea-Can	Weekly	Technicians
Instrumentation (Calibrator)	Annually	Manufacturer or authorized dealer

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## **8.1 TRAINING AND COMMUNICATION POLICY**

Scope: Applies to all Workers, Contracted Employers and Self-Employed Persons

Reference(s): MB: Workplace Safety and Health Act, Section 4(2)b, 4(4)a, 7.4(5)e; MR 217/2006 Part 2.2.1

**SK: Saskatchewan Employment Act 2014 Parts III, IV, V; Saskatchewan Occupational Health and Safety Regulation 1996, Section 12(c), 19&22(g)**

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### **OBJECTIVES**

1. To ensure management and supervisors have the knowledge, education, and training to supervise and direct the work of others to best protect the safety and health of all.
2. To ensure workers have the knowledge, education, and training to do their jobs in a manner that protects the safety and health of all.
3. To continuously enhance the safety and health competency of all workers.

### **POLICY**

Training and communication play an important role in ensuring Shreem Systems & Solutions Pvt. Ltd. is a safe, healthy and productive workplace.

Shreem Systems & Solutions Pvt. Ltd. recognizes that safety and health education and training is critical to an effective Safety Management System. Management, in consultation with the WSH Representative, will ensure a company training matrix is developed and implemented.

Training communication will be held in the form of regularly scheduled, documented safety meetings. Shreem Systems & Solutions Pvt. Ltd. will ensure that safety meetings focus on relevant, meaningful topics and that the rights and responsibilities of all stakeholders are emphasized.

### **TRAINING REQUIREMENTS**

1. Training of new workers. All new workers must have an orientation to the company safety management system which must include at a minimum:
  - a. The rights and responsibilities of all workplace parties under the Workplace Safety and Health Act and Regulations;
  - b. The name and contact information of the new worker's supervisor;
  - c. The procedure for reporting unsafe conditions at the workplace;
  - d. The procedure for exercising the right to refuse dangerous work at the workplace;
  - e. Contact information for the WSH Representative;
  - f. Any policies, programs and Safe Work Procedures the employer is required to develop pursuant to the Workplace Safety and Health Act and Regulations that apply to the work to be done by the worker;
  - g. The hazards the worker may be exposed, and the control measures undertaken to protect the worker;
  - h. The location of the first aid facilities, means of summoning first aid, and procedures for reporting illnesses and injuries;
  - i. Emergency procedures;
  - j. Identification of prohibited or restricted areas or activities;



- k. Any other matters that are necessary to ensure the health and safety of the worker while at work.
2. Workplace specific Worker Orientation training is required when a worker:
    - a. Is new to the workplace,
    - b. Is moved from one area of a workplace to another area of the workplace that has different processes or hazards,
    - c. Is relocated to a different workplace that has different processes or hazards, or
    - d. Is returning to the same workplace but the processes or hazards in the workplace changed while the worker was away.
  3. Job Specific Training  
On-job training for workers will be provided by a competent person and in a manner that ensures they can apply the training provided. Records will be maintained for all in attendance. Job specific can include but not limited to review of Safe Work Practices and Procedures, practical hands on application and competency checks
  4. Supervisor Training Plan  
Supervisors have authority over other workers and direct how work is done; therefore, they have greater responsibility for safety and health in the workplace. Shreem Systems & Solutions Pvt. Ltd. recognizes that supervisors require additional training to ensure they are competent to oversee and direct the safe work of others. The training matrix includes required training to ensure supervisors are competent.
  4. Workplace Safety and Health Representative  
The WSH Representative is charged with specific duties, and as such requires specific training in their roles and responsibilities.  
  
WSH Representative shall be allowed time annually for educational leave. The amount of time allowed for educational leave is the greater of 16 hours and the number of hours the worker normally works during two shifts. Educational leave shall be without loss of pay or other benefits, for the purposes of attending Workplace Safety and Health Training seminars, programs or courses. A request for educational leave must be submitted in writing to Management.

Refer to the training matrix for complete training requirements.

#### **TRAINING RECORDS**

Shreem Systems & Solutions Pvt. Ltd. will keep a record of all training for a minimum of 5 years, unless otherwise prescribed in the legislation.

#### **POLICY REVIEW**

Shreem Systems & Solutions Pvt. Ltd. and the WSH Representative will review the effectiveness of this policy and all components of the safety management system in its entirety every three years at a minimum.

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**TRAINING INFORMATION GUIDELINE**

**Overview of Training**

***Orientation - New and Returning Workers***

All new workers and returning workers must have an orientation to the Safety Management System (SMS) as well as a job specific/site orientation. Workers must also be orientated when moved to a new area of the workplace. The requirements for orientations are identified in the Training section of this SMS.

***Hazard Assessment and Control***

All workplaces are required to participate in the identification of workplace hazards through the hazard recognition and control system and risk assessment process. Training of workers to be proficient in this discipline can be done by the competent Supervisor, attendance in classroom courses or online training.

***Emergency Preparedness***

All workers involved in emergency response shall be appropriately trained to ensure a timely and appropriate response to the specific emergency. All workers should have knowledge of the emergency preparedness plan in the work location. Training may include;

***First Aid*** – to meet the legislated requirements. Recertification required every 36 months.

***Automated External Defibrillator*** - all workers to receive training in the general use and maintenance of the AED where a unit has been installed.

***Fire Extinguisher*** - training for emergency responders as needed. Training provided to all workers is suggested.

***Spill Response*** - training is dependent of job duties. Worker training to be determined by the supervisor.

***Workplace Inspections -***

Employers, Supervisors and WSH Committees / Reps have a responsibility to complete inspections to ensure the safety and health of the workplace. Therefore, should be trained in workplace inspections.

***Workplace Hazardous Materials Information System (WHMIS)***

All workers who work with, or in the vicinity of, hazardous products are required to be trained in WHMIS. The Company's WHMIS program is to be reviewed annually. If there are any changes, they must communicate / trained with all affected workers.

***Asbestos***

Any worker who is or is likely to be exposed to an asbestos containing material must receive training. The intensity/complexity of the training is dependent on the tasks to be performed by workers receiving the training.

### ***Incident Reporting***

To ensure effective and compliant reporting and investigation, all workers should receive an orientation to the Company's Incident Reporting and Investigation processes.

### ***Incident Investigation***

Supervisors and Workplace Safety and Health Committee members who are responsible for investigating incidents must be trained in Incident Investigation to ensure they understand their responsibilities and are competent to conduct investigations and determine root causes.

### ***Workplace Safety & Health Committees***

Manitoba Workplace Safety and Health Act Section 44 stipulates that 2 days of training per year is required to be provide to each representative upon their request. ([Saskatchewan OHS regulation part IV stipulates 5 days of training per year for committee members.](#)) Workplace Safety and Health Committee Representatives are involved in many aspects of the SMS program; training is important to ensure they are familiar with their responsibilities.

### ***Personal Protective Equipment***

Workplace Safety and Health Regulation requires all workers to be informed of and understand the safety or health risk for which the equipment is designed. Training must consist of the proper use, maintenance, inspection and limitations of the PPE specific to workers and the workplace

### ***Ergonomics***

Educating workers in the prevention of ergonomic risk in everyday activities leads to fewer injuries. All workers are encouraged to receive ergonomic awareness training. This can be a formal training program or be facilitated in a series of safety talks.

### ***Hearing Conservation***

All workers exposed to sound level of 80 dBA Lex or higher shall be informed about the hazards of the level of noise and upon request be provided with information about the selection, use and care of hearing protection. This can be a formal training program or be facilitated in a series of safety talks.

### ***SPECIFIC TRAINING:***

***Transportation of Dangerous Goods (land & marine)*** –training is needed if the types of products that are handled (ship, transport, and received) meet the definition for a dangerous good as defined in the Transportation of Dangerous Goods (TDG) Act and Regulations. The training must be provided prior to work activity and recertification every 36 months.

***Lockout*** – training is required for all workers working with or directly exposed to hazardous energy sources as well as workers involved in the repair and maintenance of equipment, machinery and tools.

***Ladder Safety*** – training required based on work activity, workers who use and/ or work from ladders.

**Fall Protection & Rescue Awareness** – This training program is recommended for all workers who may be exposed to work at heights and where awareness and refresher is required. This course is also valuable for supervisors who have workers working with fall protection to ensure they are aware of the legal/policy requirements, knowledgeable of applicable systems and program requirements and be able to recognize compliance. NOTE: All workers who work at heights must be trained by a competent person in a manner that ensures they can apply the training provided. This training must be documented and available at the request of a Workplace Health and Safety Officer.

**Fall Protection & Rescue** – This training is required dependent on work activity to ensure workers are fully competent in the use of all applicable equipment and procedures including rescue. Industry best practices is recertification every 36 months. This training must be documented and available at the request of a Workplace Health and Safety Officer.

**Confined Space Awareness** - This training program is recommended for all workers who may be exposed to work in confined spaces and where awareness and refresher is required. This course is also valuable for supervisors who have workers working in confined spaces to ensure they are aware of the legal/policy requirements, knowledgeable of applicable systems and program requirements and be able to recognize compliance. NOTE: All workers who work in confined spaces must be trained by a competent person in a manner that ensures they can apply the training provided. This training must be documented and available at the request of a Workplace Health and Safety Officer.

**Confined Space Entry and Rescue** - Training is dependent on work activity to ensure the worker is fully competent in the use of all applicable equipment and procedures including rescue. (SCBA, if required by hazard). Industry best practice is recertification every 36 months. This training must be documented and available at the request of a Workplace Health and Safety Officer.

**Self-Contained Breathing Apparatus Course (SCBA)** – course dependent on work activity to ensure workers are fully competent in the use of SCBA equipment for Confined Space Entry. This training must be documented and available at the request of a Workplace Health and Safety Officer.

**Respirator Training and Fit Testing** - required for employees that will be required to wear a respirator. Recertification every 2 years. This training must be documented and available at the request of a Workplace Health and Safety Officer.

**Scaffolding Course** - training dependent on work activity to ensure workers are fully competent in the use and erection of scaffolding and all applicable equipment and procedures. Best practice is recertification every 36 months.

**Excavation** – training dependent on work activity; any workers involved in trenching and excavation operations.

**Flag person** – certification required prior to flagging operations. Course consists of in classroom and competency check. Certificate is valid for 36 months. This training must be documented, a certification card is to be on your person and available at the request of a Workplace Health and Safety Officer.

**Traffic Control Coordinator** – certification for workers involved with traffic control operations. Recommended for workers who inspect or set up traffic control sites. Recertification every 36 months.

**Winter Survival** – recommended course for anyone involved in the construction or travelling on the winter road system.

#### **Manager/ Supervisor Training**

**Supervisor Essentials** – information for supervisors on their legislative and leadership responsibilities.

**Principles of Safety Management** – teaches how to create a company safety and health manual and provide practical guidelines to keep the safety and health effective. **Required for COR Certification**

**Leadership for Safety Excellence** – Recommended for managers and supervisors and is **required course for COR Certification**. Provided through the Construction Safety Association of Manitoba.

**Safety Auditor** – Required for any person who will be responsible to complete **internal audits for COR Certification**. Requires a self audit annually to maintain Registered Auditor Certification in Manitoba.

**Train the Trainer** – to be able to provide training courses in-house courses, one may receive certification as a competent trainer. **This course is also required for COR Certification.**

#### **Equipment Certification**

Workers prior to operating any equipment powered by gas, diesel, electric or propane, or any other units specified, shall receive instruction on the safe operation and servicing of that equipment with a practical component. Training needed based on work activity or as deemed required. Recertification every 60 months except for the following;

Forklift – 36 months recertification required.

Aerial Lift/ Scissor Lift – 36 months recertification industry best practice.

Skid Steer – 36 months recertification industry best practice

Overhead Crane Operation – 36 months recertification industry best practice.

Rigging and Hoisting- 36 months recertification industry best practice

Electrical Safety- 36 months recertification industry best practice

**TRAINING MATRIX**

Course/ Name of Employee	Greg Blackmon	Jagdish Kumar	Daniel Van De Spiegle	Shivang Patel	Cody Hopkins	Kirk Jakubowski	Eric Frazer	Monica Bowles	Nirmal Thakar	Yesha Kajivala
Ergonomics and MSI Awareness	√	√	√	√	√	√		√		
Fall Protection Refresher online	√	√	√	√	√	√		√		
Fall Protection- Practical component		√	√	√	√	√	√			
Fire Extinguisher		√	√		√			√		
Harassment and Respectful workplace	√	√	√		√			√		
Hazard Awareness	√	√			√					
Hearing and Noise	√		√							
Incident Investigations	√	√			√			√		√
Ladder Safety	√	√	√	√	√					
Lockout Awareness	√	√	√		√					
Respirator Care and Use	√		√	√	√					
SCOT	√				√				√	
Supervisor Essentials	√				√					
WHMIS 2015: GHS	√	√	√	√	√	√		√	√	√
Working Alone or In Isolation	√				√			√		
Working around PME	√		√		√					
Workplace Inspections	√				√			√		
Workplace Safety and Health Orientation	√							√		
WSH Representative Essentials	√				√					√
Covid 19 Safety Awareness and Prevention		√				√				
WSH Committee Essentials					√					
Transportation of Dangerous Goods					√					
H2S Alive	√									
Emergency First Aid, CPR C & AED									√	
Hearing Test	√	√	√	√	√			√	√	√
Canada Arc Flash Safety					√					
Confined Space										
Aerial Lifts					√					
Swagelok Installation Training Level 1				√						

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## **9.1 INSPECTION POLICY**

- Scope: Applies to all buildings, structures, equipment, tools, processes, etc. Applies to all workers, contracted employers and self-employed persons
- Reference(s): MB: Workplace Safety and Health Act, Section 7.4(5) b, 40(10) b, h; MR 217/2006 Part 2.4(1)  
**SK: Saskatchewan Occupational Health and Safety Regulations 1996 as amended Section 12, 22, 23, 28, 107, 155, 156, 193, 216, 229**
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Regular inspections have been shown to reduce incidents and occupational illness and should not be taken lightly. They can also prevent loss to equipment, process, property and the environment by identifying unsafe acts and conditions.

### **POLICY**

Shreem Systems & Solutions Pvt. Ltd. recognizes that workplace inspections are a critical part of an effective Safety Management System. The objective of the inspection program is to:

1. Identify and record potential and actual hazards associated with people, buildings, equipment, processes and practices.
2. Ensure existing hazard controls are functioning as they should and, where appropriate, recommend corrective action.

The company will maintain a comprehensive program of safety inspections at all facilities and job sites. Observations will be documented and follow up inspections will be conducted to ensure corrective action has been implemented. Inspections will be conducted by those most knowledgeable of the work process and area.

Shreem Systems & Solutions Pvt. Ltd. expects consistent safety awareness from all workers, as safety is everyone's responsibility to ensure each person goes home safely at the end of each workday.

Whenever known or potential hazards are recognized in daily work activity (informal inspection), supervisors and workers are expected to take corrective action; if it is safe for them to do so. Serious hazards must be reported.

It will be the responsibility of the supervisor to take corrective action and follow up on corrective action when hazards are identified. In some instances, stopping work may be necessary, until safe working conditions are restored. Documentation, to show ongoing due diligence, is required.

Formal inspections will be conducted and documented according to the inspection schedule.

### **INSPECTION SCHEDULE**

1. Shreem Systems & Solutions Pvt. Ltd. will develop and maintain an inspection schedule that strives to:
  - a. Mitigate risks to safety and health of workers, clients and the general public,
  - b. Prevent loss to process, property and the environment,
  - c. Meet the requirements of the Workplace Safety and Health Act and Regulations.
2. Inspection schedules must:
  - a. Identify what will be inspected, the frequency of inspections, and who will perform inspections,
  - b. Include inspections of work procedures and processes, and
  - c. Provide for risk assessment and corrective action.

**FOLLOW-UP**

1. The WSH Representative will review workplace Inspection Reports and ensure that corrective action is satisfactory. Corrective action must be documented on the Inspection Report.
2. Subsequent workplace inspections will review the items from the previous inspection to ensure the corrective action has resolved the concern.
3. The Shreem Systems & Solutions Pvt. Ltd. is ultimately responsible for reviewing the Inspection Reports and ensuring that appropriate corrective action is taken.



### 9.1.1 INSPECTION PROCEDURE

Scope: Applies to all buildings, structures, equipment, tools, processes, etc. Applies to all workers, contracted employers and self-employed persons

Reference(s): MB: Workplace Safety and Health Act, Section 7.4(5) b, 40(10) (b, h); MR 217/2006 Part 2.4(1)  
SK: Saskatchewan Occupational Health and Safety Regulations 1996 Part 3, Section 22(1)(e), Section 28(1)

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#### PROCEDURE

1. Formal inspections will be conducted as set out in the inspection schedule as well as informal inspections of people, processes and work areas will be conducted to effectively manage risk.
2. Workers must cooperate with the inspection of their immediate work area.
3. Communicate with workers throughout the inspection process. Explain that you are doing a Safety and Health Inspection and ask workers about their concerns
4. Accurately document your findings on the Inspection Report.
5. All Inspection Reports must be signed by the worker conducting the inspection and by the worker's supervisor. Inspection reports must be sent to the WSH Representative for their review, when required on the inspection sheet or when otherwise requested.
6. Where hazards are identified, they must be assessed and dealt with in a timely manner. Specifically, you should:
  - i. Identify and assess the hazard,
  - ii. Determine corrective actions,
  - iii. Assign a person and date to correct, and
  - iv. Follow-up to ensure all corrective actions are implemented and working.
7. The supervisor will ensure that corrective action is timely, appropriate and effective and it is communicated to workers who may be affected.
8. Records of inspections and subsequent corrective action will be posted on the Workplace Safety and Health Bulletin Board.

**INSPECTION SCHEDULE**

<b>Equipment to Check</b>	<b>When - Frequency</b>	<b>Who</b>
Company Vehicles	Weekly	Drivers
Eyewash Station	Self-Contained - Change Solution and water additive conditioner every 6 months or as per manufacture  Plumbed –Annually ANSI Z358.1	Designated worker  Authorized Service Provider
Emergency Equipment: <ul style="list-style-type: none"> <li>• Fire Extinguishers</li> <li>• Eyewash station</li> <li>• Smoke Detectors</li> <li>• CO Detectors</li> <li>• Emergency lighting</li> </ul>	Monthly	Office
Fall Protection Equipment	Annually & Pre-use	Authorized Service Provider or Worker
Shop	Monthly	Technicians
Tools	Pre-Use	Technicians
Office Trailer	Weekly	Technicians
Building	Semi Annually	Office
Job Trailers	Weekly & Pre-use – While on site	Technicians
Sea-Can	Weekly	Technicians
Instrumentation (Calibrator)	Annually	Manufacturer or authorized dealer

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## 10.1 INCIDENT REPORTING AND INVESTIGATION POLICY

Scope: Applies to all workers, contracted employers and self-employed persons, Customers and Visitors

Reference(s): MB: Workplace Safety and Health Act, Section 7.4(5) (i); MR 217/2006 Part 2.7-2.9  
**SK: Saskatchewan Occupational Health and Safety Regulations, Section 22 (1) (b & c), Section 29-32**

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### POLICY

When incidents occur, it is vital that they are effectively responded to and thoroughly investigated by a competent team so root causes are identified, controls can be implemented, future events are avoided, and legal repercussions are mitigated.

Unless root causes are determined and eliminated, the same incidents will likely be repeated. Therefore Shreem Systems & Solutions Pvt. Ltd. requires all serious incidents are reported and investigated. This includes:

1. Illness or injury to any person affected by our work,
2. Near misses with a potential to be a serious incident, and
3. When equipment or property damage results in costs of greater than \$500.

All workers will report all incidents and near misses to their supervisor and cooperate with all investigations. All investigations will be conducted in cooperation with the WSH Representative to ensure root causes of incidents are identified and controlled.

### INCIDENT RESPONSE AND REPORTING OVERVIEW

1. Assess the scene and ensure safety for yourself, any injured persons and bystanders. Provide first aid and/or call Emergency Medical Services (EMS)/Police as required. (e.g. injuries, impairment, non-cooperative, no licence/registration, etc.).
2. If the incident is defined as a **Serious Incident**, the incident must be reported to Workplace Safety and Health Authorities. See **Serious Incident Procedure**.
3. Preserve the scene, until directed otherwise. The scene of a serious incident may only be disturbed to free a trapped person or prevent further injury / loss.
4. Obtain the following applicable information from all involved or witnesses before they leave the scene;
  - a. Name and contact information all parties including witnesses,
  - b. Vehicle licence plate number, (in the case of vehicular damage)
  - c. Name of insurer and insurance policy number (in the case of vehicular damage from an out of province/territory vehicle), and
  - d. If Police or other emergency officials are present, request contact information from the official's, office location, their incident number and/or business card.
5. Follow Incident Investigation Procedures.
6. If the incident is a reportable injury with WCB, see **WCB Reporting Procedures**.

#### **INCIDENT PROCEDURES REPORTING OVERVIEW**

1. Incidents requiring supplies from any First Aid Kit must be recorded in the First Aid Log. First Aid Logs are in every First Aid Kit.
2. The purpose of incident reporting is to control future loss and not to find fault.
3. Incident reporting may be confidential.
4. Incident Reports must be signed by the supervisor to whom the incident or near miss was reported and the worker involved.
5. The supervisor must ensure that the root causes of incidents are identified, and corrective action is taken.
6. The WSH Representative must review and sign Incident Reports and is expected to participate in monitoring the corrective action and to ensure it is effective.

Shreem Systems & Solutions Pvt. Ltd. will ensure all records are kept for a minimum of 5 years.

### 10.1.1 SERIOUS INCIDENT PROCEDURE

**Reporting of Serious Incidents: Workplace Safety and Health Branch (204) 945-3446 or 1-855-957-7233 (24-hour line). Only company's designated representatives trained in Serious Incidents shall make the call.**

#### REPORTING OF SERIOUS INCIDENT PROCEDURE TO THE WORKPLACE SAFETY AND HEALTH BRANCH -

**1. The following *SERIOUS INCIDENTS* are required to be reported to the Workplace Safety and Health Branch by the fastest means of communication possible:**

- a. Where a worker is killed;
  - b. Where a worker suffers:
    - i. An injury resulting from electrical contact,
    - ii. Unconsciousness as the result of a concussion,
    - iii. A fracture of his or her skull, spine, pelvis, arm, leg, hand or foot,
    - iv. Amputation of an arm, leg, hand, foot, finger or toe,
    - v. Third degree burns, permanent or temporary loss of sight,
    - vi. A cut or laceration that requires medical treatment at a medical facility, or
    - vii. Asphyxiation or poisoning; or
  - c. That involves
    - i. The collapse or structural failure of a building, structure, crane, hoist, lift, temporary support system or excavation,
    - ii. An explosion, fire or flood,
    - iii. An uncontrolled spill or escape of a hazardous substance, or
    - iv. The failure of an atmosphere-supplying respirator.
2. Assess the scene for safety for the victim, rescuers and bystanders. If safe to do so, ensure first aid/medical attention is provided to the victim and the EMS System has been activated (911).
  3. Contact a supervisor immediately and inform them.
  4. If you are not sure if the incident is reportable, contact 1Life Workplace Safety Solutions or your legal counsel to confirm. Note: this cannot delay reporting to The Workplace Safety and Health Branch.
  5. Secure the incident scene so there is no risk of further injury and so that evidence is preserved for the investigation. Lockout all equipment and machinery. No person may interfere with, disturb, destroy, alter, or carry away anything at the scene, or anything connected with the occurrence, unless a Workplace Safety and Health Officer has given permission to do so.

**NOTE:** The EMPLOYER must preserve a scene of a serious incident for at least 24 hours after notice is given to Workplace Safety and Health Branch, except for the following conditions:

- i. If it is necessary to free a trapped person,

- ii. To avoid the creation of an additional hazard,
  - iii. If directed by a Workplace Safety and Health Officer.
6. The company's designated representative (only) will call the Workplace Safety and Health Branch (204) 945-3446 or 1-855-957-7233 (24-hour line) by the fastest means of communication possible. Be prepared to provide the following information:
- a. The name and address of each person involved in the incident
  - b. The name and address of the employer, and if any person involved in the incident is employed by another employer, the name and address of that other employer
  - c. The name and address of each person who witnessed the incident
  - d. The date, time and location of the incident
  - e. The apparent cause of the incident and the circumstances that gave rise to it

**Note:** If the cause is unknown or under investigation, advise WSH Branch as such

- 7. If the employer becomes aware that the above information given to the Branch was inaccurate or incomplete, the Branch must be contacted immediately to be given to the correct information.
- 8. The family of the injured worker will be notified by management. In some cases, the police may notify the family.
- 9. The incident must be investigated with a supervisor and the participation of the WSH Representative
  - a. When a serious incident has occurred, contact 1Life Workplace Safety Solutions/and/or your legal counsel to determine if a Client Solicitor Privileged Investigation is warranted.
  - b. Management reserves the right to conduct a separate internal investigation from that required by the WSH Representative.

**SASKATCHEWAN: To Report Serious Incidents Call  
The Occupational Health and Safety Division at 1-800-567-7233**

1. The following work related incidents must be reported to The Saskatchewan Occupational Health and Safety Division immediately by the fastest means of communication. **Phone: 1-800-567-7233**

- a. a fatality of an Employee
- b. Any injury that requires a worker to be admitted to a hospital as an in-patient for a period of 72 hours or more.

The notice required by the above requirements must include:

- i. the name of each injured or deceased worker;
  - ii. the name of the employer of each injured or deceased worker;
  - iii. the date, time and location of the accident;
  - iv. the circumstances related to the accident;
  - v. the apparent injuries; and
  - vi. The name, telephone number and fax number of the employer or contractor or a person designated by the employer or contractor to be contacted for additional information.
  - c. An employer shall provide each co-chairperson with a copy of the notice.
2. The following dangerous occurrences must be reported to the Saskatchewan Occupational Health and Safety Branch as soon as is reasonably possible that takes place at the workplace **whether or not a worker sustains injury**:
    - a. The structural failure or collapse of:
      - i. A structure, scaffold, temporary false work or concrete formwork; or
      - ii. All or any part of an excavated shaft, tunnel, caisson, cofferdam, trench or excavation;
    - b. The failure of a crane or hoist or the overturning of a crane unit of powered mobile equipment;
    - c. An accidental contact with an energized electrical conductor;
    - d. The burst of a grinding wheel;
    - e. An uncontrolled spill or escape of a toxic, corrosive or explosive substance;
    - f. A premature detonation or accidental detonation of explosive substances;
    - g. The failure of an elevated or suspended platform; and
    - h. The failure of an atmosphere-supplying respirator
  3. The notice required by the above requirements must include:
    - a. The name of each employer, contractor and owner at the place of employment;

- b. The date, time and location of the dangerous occurrence;
  - c. The circumstances related to the dangerous occurrence; and
  - d. The name, telephone number and fax number of the employer, contractor or owner or a person designated by the employer, contractor or owner to be contacted for additional information.
4. An employer, contractor or owner shall provide each co-person or the representative with a copy of the notice.

### **Critical Injuries**

In the event of critical injury or fatality, the following procedure must be followed:

1. **Priority #1** – Assess the scene for safety for the victim, rescuers and bystanders. If safe to do so, ensure first aid/medical attention is provided to the victim and the EMS System has been activated (911).
2. **Priority #2** - Notify a Supervisor immediately. This person will be responsible to ensure the following persons are notified:
  - The Provincial Ministry
  - The Employer
  - The OH Committee/ Representative and any other appropriate authorities or resources

**The Workplace Safety and Health Division must be notified immediately using “the fastest means possible”.**

**To Report Serious Incidents in SASKATCHEWAN Call the OHS Division at 306-787-4496**

### **INVESTIGATIONS**

Shreem Systems & Solutions PVT. Ltd. will ensure that all serious incidents are investigated.

The following incidents must also be investigated:

- a. any injury or illness resulting in time loss
- b. injuries requiring medical attention
- c. injuries or illnesses resulting in acute or chronic occupational illness
- d. equipment or property damage resulting in costs of more than \$200
- e. any chemical spill more than 1 L
- f. any incidence of fire or explosion
- g. near misses that could have resulted in any of the above incidents



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### 10.1.2 WCB REPORTING PROCEDURES - Manitoba

#### Employer

In the event of a WCB reportable injury the employer must report the injury to the WCB within five business days.

A reportable injury is an injury that arises out of, and in the course of employment, or which is claimed by the worker concerned to have arisen out of and in the course of such employment, and in respect of which any of the following conditions are present or subsequently occur:

1. The worker loses consciousness following the incident, or
2. The worker needs to, intends to or has sought medical attention, or
3. The worker is unable or claims to be unable by reason of the injury to return to his or her usual job function on any working day subsequent to the day of the injury, or
4. An injury resulting in the breakage of an artificial limb, eyeglasses, contact lenses, dentures, hearing aid, or any other prosthetic device, or
5. The WCB has requested that an employer forwards a report of the injury or occupational disease to the WCB, or occupational disease to the WCB, or the worker has filed a claim.

The obligation of the employer to report the incident resulting in an injury to the WCB begins when a supervisor, first aid attendant, or other representative of the employer first becomes aware of any one of the conditions listed above, or when notification of any such condition is received at the local or head office of the employer.

#### Worker

1. Report the injury to your employer as soon as possible.
2. If you miss time from work or see a healthcare provider because of a work-related injury, report the injury to the WCB by phone, fax or mail.

**By phone:** In Winnipeg at 204-954-4100, and a Claim Information Representative will take injury details. Outside Winnipeg, call toll free, 1-855-954-4321.

**By fax:** Fax your completed Workers' Report of Injury Form to the WCB at 204-954-4999 or toll-free outside of Winnipeg 1-877-872-3804.

**By mail:** Mail your completed Workers' Report of Injury Form to the WCB at the following address:

The Workers Compensation Board of Manitoba 333 Broadway, Winnipeg MB R3C 4W3

The forms can be filled out on your computer or you can obtain the paper forms by calling 204-954-4922.

3. Let your doctor know that you will be making a WCB claim. Your doctor will then complete a medical report on your injury and forward to WCB.
4. Keep in contact with your employer and let them know how you're recovering. Keeping in touch can really help to ease your return to work.
5. Be sure to follow the advice of your medical professional. Take your medications and participate in any physical rehabilitation programs they prescribe. An active recovery is the best way to minimize the negative effects of your injury. Your WCB benefits may be stopped if you aren't following your doctor's treatment plan.

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### 10.1.3 WCB REPORTING PROCEDURES - Saskatchewan

#### Employer

In the event of a WCB reportable injury the employer must report the injury to the WCB within five business days.

A reportable injury is an injury that arises out of, and in the course of employment, or which is claimed by the worker concerned to have arisen out of and in the course of such employment, and in respect of which any of the following conditions are present or subsequently occur:

6. The worker loses consciousness following the incident, or
7. The worker needs to, intends to or has sought medical attention, or
8. The worker is unable or claims to be unable by reason of the injury to return to his or her usual job function on any working day subsequent to the day of the injury, or
9. An injury resulting in the breakage of an artificial limb, eyeglasses, contact lenses, dentures, hearing aid, or any other prosthetic device, or
10. The WCB has requested that an employer forwards a report of the injury or occupational disease to the WCB, or occupational disease to the WCB, or the worker has filed a claim.

The obligation of the employer to report the incident resulting in an injury to the WCB begins when a supervisor, first aid attendant, or other representative of the employer first becomes aware of any one of the conditions listed above, or when notification of any such condition is received at the local or head office of the employer.

#### Worker

6. Report the injury to your employer as soon as possible.
7. If you miss time from work or see a healthcare provider because of a work-related injury, report the injury to the WCB by phone, fax or mail.

**By phone:** 1-800-787-9288 and a WCB Representative will take injury details.

**Online:** Visit [www.wcbask.com/W1](http://www.wcbask.com/W1) and fill out the online form.

**By mail:** Mail your completed Workers' Report of Injury Form to the WCB at the following address:

**200-1881 Scarth Street, Regina, SK S4P 4L1**

8. Let your doctor know that you will be making a WCB claim. Your doctor will then complete a medical report on your injury and forward to WCB.
9. Keep in contact with your employer and let them know how you're recovering. Keeping in touch can really help to ease your return to work.
10. Be sure to follow the advice of your medical professional. Take your medications and participate in any physical rehabilitation programs they prescribe. An active recovery is the best way to minimize the negative effects of your injury. Your WCB benefits may be stopped if you aren't following your doctor's treatment plan.

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#### 10.1.4 INCIDENT INVESTIGATION GUIDELINE

1. Incident investigations are an important and valuable part of our Safety Management System because they serve to:
  - a. Identify substandard acts and conditions and determine direct and indirect causes
  - b. Determine the most effective corrective action to improve our Safety Management System and prevent future losses
  - c. Identify trends
  - d. Demonstrate leadership and commitment of our organization
  - e. To establish the due diligence of the company and mitigate future risk
  
2. Three Basic Facts:
  - a. Incidents are caused
  - b. Incidents can be prevented if the causes are eliminated
  - c. Unless the causes are eliminated, the same incidents will happen again
  
3. Be mindful and look for the three common reasons for failure in a safety management system:
  - a. inadequate system standards
  - b. inadequate training
  - c. inadequate compliance with standards
  
4. Ensure you perform a risk assessment, take all hazard precautions and wear all required PPE to conduct the investigation safely.
  
5. When performing the investigation ASK:
  - a. WHO, WHERE, WHAT, WHEN questions.
  - b. ASK WHY did it happen FIVE TIMES:
    - i. **WHY** did Bob fall off the step ladder?
    - ii. Bob was performing repairs in the main warehouse thru a door and the forklift struck him. **WHY?**
    - iii. There was no barrier to protect him and the forklift was not able to stop. **WHY?**
    - iv. The brakes failed on the forklift. **WHY?**
    - v. Maintenance on the forklift was 6 months overdue. **WHY?**
    - vi. With overproduction, management has been directing to put off maintenance tasks...too busy.
  
  - c. ASK WHAT should we do about it?
  
6. When investigating:
  - a. Consider your:
    - i. Biases (Individual, Team, Others?)
    - ii. Experience and skills (how it affects your perception)
    - iii. Attitude. The success of the investigation is highly dependent on the investigators attitude, approach and communication style
  - b. Avoid jumping to conclusions

- c. Use appropriate voice tone
  - d. Minimize stress wherever possible
  - e. Be aware of your non-verbal communication (e.g. facial expressions, gestures)
  - f. Behave professionally (representative of your company's safety and health culture, courteous, open, honest, candid, non-threatening)
7. Carrying out the Investigation
- a. Get an overview of the situation.
  - b. Who was involved?
  - c. What are the general conditions?
  - d. Identify substandard acts or conditions
  - e. Uncover direct/indirect causes
  - f. Gather Physical Evidence
  - g. Take Detailed Notes
  - h. Take photograph and draw diagrams
    - i. Look for things such as...
    - ii. Positions of injured people
    - iii. Condition of equipment and tools
    - iv. Condition of the work environment
    - v. Safety controls that were in use
    - vi. The angles or forces involved
    - vii. Where objects are in relation to each other
8. Interview Witnesses as soon as possible
- a. Expect them to be nervous – use reassurance, be patient and kind
  - b. Ask open ended questions; Ask “who, what, when, where, why, how”
  - c. Ask what they saw before, during and after the incident
  - d. Use active listening techniques
  - e. Watch the person for nonverbal communication
  - f. Interview in private, one person at a time
  - g. Take detailed notes of each statement
9. Check Background Information such as:
- a. Time of Accident
  - b. Hazard Assessments
  - c. Inspections Reports
  - d. MSDS/s
  - e. Maintenance Records
  - f. Audit & Action Plan
  - g. Previous Investigations
  - h. Training Records
  - i. Safe work practices & job procedures
  - j. Meeting minutes
10. Determine the causes. Causes are likely to fall into five categories:

- a. Task
- b. Material including inadequate tools.
- c. Environment including work environment.
- d. Personnel including personal factors – lack of knowledge or skill, stress, improper motivation, impairment, inadequate training, language barrier etc.
- e. Management including supervision

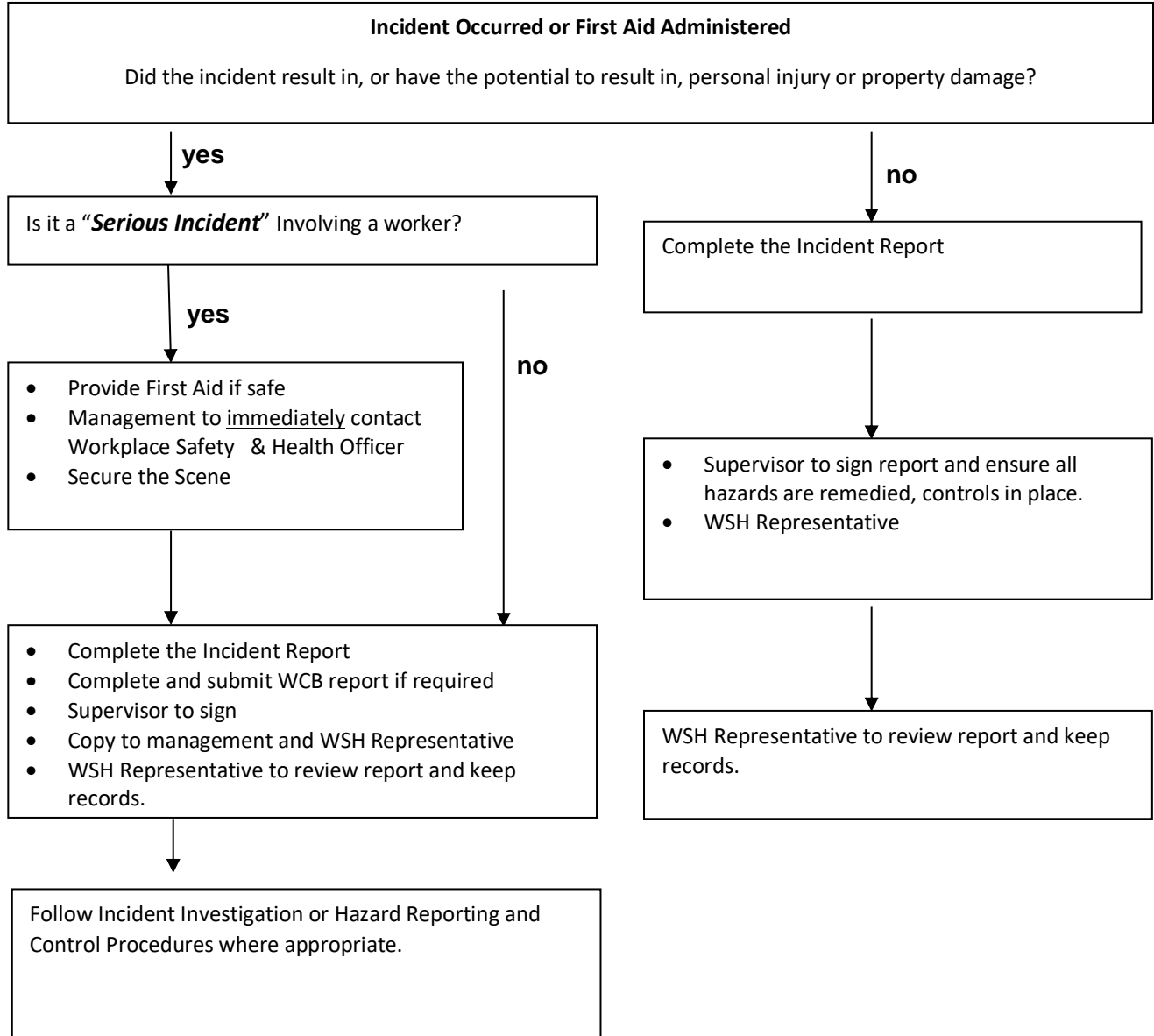
**Remember: Only 15% of a company's problems can be controlled by individual employees – while 85% can be controlled only by the management system. - Edward Deming**

11. Follow up and communicate corrective actions.

**In the Event of a Serious Incident (i.e. workplace fatality or major injury)**

12. Designate an “Incident Coordinator” in the event of a serious workplace incident who will be the primary liaison with investigating officers. This should be a person who has the authority to respond to investigating officers demands and has experience dealing with stressful situations.
13. The Incident Coordinator must be a person that has been trained in how to deal with a serious workplace incident and investigating officers so that it's managed in the best possible way.
14. Legal council specializing in the area of OHS law should be contacted and request a “Client Solicitor Privileged” Investigation. If the company does not elect to do so, then at a minimum, a lawyer or a senior safety professional experienced in OHS Law and defence should review the required written incident report before it is sent to the regulator to ensure that incriminating information has not been inadvertently included.
15. Conduct an internal Incident Investigation separate from the WSH Committee Investigation. Ensure that all evidence such as documents, witness and subject matter expert statements and any other evidence of all due diligence steps taken are obtained and preserved. It is highly recommended that this internal report be protected with solicitor client privilege. Contact a lawyer knowledgeable in Workplace Safety and Health/Occupational Safety and Health Law to assist you.

**INCIDENT REPORTING FLOW CHART**



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### **11.1 EMERGENCY PREPAREDNESS POLICY**

Scope: Applies to all workers, contracted employers and self-employed persons

Reference(s): MB: Workplace Safety and Health Act, Section 7.4(5)(b).

SK: Saskatchewan Occupational Health and Safety Regulations, Part III, Section 22 (1) (b,c); Part XXV Section 360, 361

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Shreem Systems & Solutions Pvt. Ltd. will develop and maintain an Emergency Response Plan (ERP) and will train and educate workers in its use to ensure timely and appropriate response to emergencies. The plan will identify potential emergencies and hazards and will include procedures to mitigate the effects of an emergency or disaster.

#### **OBJECTIVES**

Shreem Systems & Solutions Pvt. Ltd. will:

1. Strive to ensure that emergencies are avoided through effective risk management practices.
2. Proactively develop a state of readiness so that, in the event of an emergency, losses to people, process, property and the environment are minimized.
3. Provide an understanding of the type and extent of potential emergencies (risk/exposures) that we may experience.

Shreem Systems & Solutions Pvt. Ltd. will ensure that the Emergency Preparedness Plan is communicated throughout our organization. Shreem Systems & Solutions Pvt. Ltd. will ensure everyone understands their roles and responsibilities and familiarity with emergency response equipment, personal protective equipment, and tactics.

Emergency responders will be adequately trained in their specific responsibilities. Shreem Systems & Solutions Pvt. Ltd. will maintain the required amount of First Aiders as per the Provincial Legislation. The names of the Emergency Responders and First Aiders shall be posted on the WSH Bulletin Board as well as be available/posted at each job site.

#### **PRACTICE DRILLS**

Practice drills, practical scenarios, tabletop or computer-synthesized simulations will be held at minimum annually to develop worker skills and to evaluate the quality of the ERP. The objectives of a drill include evaluation of the following:

1. Practicality of the plan, (structure and organization)
2. Adequacy of communications and interactions among parties,
3. Emergency equipment effectiveness,
4. Adequacy of first aid and rescue procedures,
5. Adequacy of training, and
6. Evacuation and muster procedures.

#### **POLICY REVIEW**

Shreem Systems & Solutions Pvt. Ltd. and the WSH Representative will review the effectiveness of the emergency response plans annually or after an incident in the workplace.

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## 12.1 STATISTICS AND RECORDS

Scope: Applies to all workers, contracted employers and self-employed persons

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### OBJECTIVE

Shreem Systems & Solutions Pvt. Ltd. will strive to maintain safety and health documentation in order to demonstrate compliance. In addition, documentation can help identify trends and deficiencies and evaluate effectiveness of safety initiatives

Ensure records are kept for five years at a minimum.

Accurate safety and health statistics and records shall be maintained in order to:

1. Enable management to monitor and evaluate the health and safety performance of the company, specific job sites, supervisors and workers.
2. Identify common incident factors and trends.
3. Monitor and evaluate the effectiveness of corrective actions.

Appropriate records and statistics that will be maintained include:

1. Records
  - a. Near Miss/Dangerous Occurrence Report
  - b. Safe Job Plan/Hazard Inspection/Toolbox Talk
  - c. Critical Job Inventory List
  - d. Hazard Identification Checklist
  - e. Incident Report
  - f. Incident Investigation Report
  - g. Orientation
  - h. Worker Training/Competency Record
  - i. Notice of Disciplinary Action
  - j. Contracted and Self-employed Worker Safety Evaluation
  - k. First Aid Treatment Report
  - l. Equipment Pre-start Checklists
  - m. Workplace Safety and Health Committee Minutes
  - n. COR Audit Corrective Action Plan
2. Statistics
  - a. Monthly Injury Frequency and Severity Ratios
  - b. Monthly summary of incidents and near misses
  - c. Annual Summary of safety and health program activities, such as:
    - i. Safety meetings
    - ii. Inspections
    - iii. Investigations
    - iv. Orientations
    - v. Training sessions



Statistics and records will be reviewed with consultation of the WSH Representative to evaluate the safety management system, identify common incident factors and trend and monitor and evaluate the effectiveness of corrective actions.

Shreem Systems & Solutions Pvt. Ltd. will promote proactive safety improvements continuously, especially when statistics and records highlight areas that are deficient.

#### **POLICY REVIEW**

Shreem Systems & Solutions Pvt. Ltd. and the WSH Representative will review the effectiveness of this policy and all components of the safety management system in its entirety every three years at a minimum.

# Manitoba Supplement

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## **14.1 RESPONSIBILITIES OF THE WORKPLACE SAFETY & HEALTH REPRESENTATIVE**

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The purpose of the Workplace Safety and Health (WSH) Representative is to provide a forum for management and workers to enhance the ability of the company to reasonably and cooperatively identify, evaluate, resolve and record safety and health concerns. They are to assist as an internal monitor of the safety management system, giving feedback to management on what's working (or not). Furthermore, they act to represent the rights of workers, for example in incident investigations and work refusals. For clarity's sake, the WSH is not responsible for safety.

WSH Representative is required in a workplace when there are 5 or more, but not more than 19 workers regularly employed. The WSH Representative must not be associated with management and must be trained to fulfill their duties.

The Workplace Safety and Health Representative duties include:

- a. Attend safety meetings with Senior Management, at a minimum, once every three months.
- b. Participate in workplace safety inspections, special assignments and activities.
- c. Prepare the agenda the week prior to the meeting, circulate to management and post on the WSH bulletin board.
- d. Review the minutes and sign them before distribution.
- e. Assign special or ongoing projects.
- f. Take a leadership role in promoting safety and health amongst all workers in the workplace.
- g. The receipt, consideration, and disposition of concerns and complaints respecting the safety and health of workers and/or sub-contractors.
- h. Participate in the identification of risks to safety and health arising out of, or in connection with, activities at Shreem Systems & Solutions Pvt. Ltd.. The WSH Representative is not responsible for unsafe conditions or health hazards in the workplace.
- i. The WSH Representative may be called upon to assist management in the assessment of new products, processes or equipment prior to being introduced into Shreem Systems & Solutions Pvt. Ltd..
- j. Establish an effective means of safety and health communication between the WSH Representative and all workers.
- k. Cooperate with a Safety and Health Officer who is exercising their duties under the Workplace Safety and Health Act.
- l. Develop and promote programs to educate and inform workers about safety and health at Shreem Systems & Solutions Pvt. Ltd..
- m. Communicate safety and health related matters to management.
- n. Maintain records in connection with the receipt and disposition of concerns, complaints and all matters relating to the duties of the WSH Representative for a minimum of five years.
- o. Participate in work refusal investigations.
- p. Inspect the workplace, work processes and procedures at least once before each regularly scheduled safety meeting with Senior Management.
- q. Participate in incident investigations.

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#### **14.1.1: WORKPLACE SAFETY AND HEALTH REPRESENTATIVE RULES OF PROCEDURE**

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##### 1. Election of Workplace Safety and Health (WSH) Representative

Management shall appoint one or more workers, not associated with management, to co-ordinate the election of the WSH Representative. The election shall be conducted in a manner consistent with recognized democratic practices.

##### 2. Term of Office

The term of office of a WSH Representative shall normally be two years, however there is no limitation on the number of years a WSH Representative may serve, or terms they are eligible for re-election.

##### 3. Bulletin Board

Management will provide a WSH Bulletin Board (or make information digitally available on the Safety App) at every worksite for the exclusive use of the WSH Representative. The bulletin board must be accessible to all workers. Information posted on the board shall include:

- i. The name of WSH Representative, how to contact them and their term of office expiry date,
- ii. The scheduled dates of meetings,
- iii. The agenda for each meeting, posted one week in advance of the meeting,
- iv. The minutes of each meeting signed by the WSH Representative and management. Minutes must remain posted until all matters recorded have been resolved,
- v. Any improvement order, report or other documentation applicable to the workplace issued by or recommended to be posted by a Safety and Health Officer,
- vi. Any other information as required by legislation,
- vii. Only safety related items.

##### 4. Meeting Guidelines

When a WSH Representative is designated at a workplace, Senior Management must meet their WSH Representative at regular intervals not exceeding three months to discuss safety and health matters. The subsequent meeting time and date shall be scheduled at each meeting and shall be posted with an agenda on the WSH Bulletin Board. A WSH Representative is entitled to take one hour off from his/her regular duties to prepare for each safety and health meeting without loss of pay.

A WSH Representative may call a special meeting with the employer to deal with matters of urgent concern, including but not limited to serious incidents, accidents, dangerous occurrences or matters believed to constitute a serious risk to the safety or health of a worker or another person.

Senior Management must meet with the WSH Representative when WSH Representative calls a special meeting.

The meetings will be restricted to safety and health related issues and concerns.

##### 5. Educational Leave

The WSH Representative shall be allowed educational leave of two normal working days per year, without loss of pay or other benefits for the purposes of attending Workplace Safety and Health training seminars, programs or courses.

WSH Representative attending educational programs and seminars will be required to report back to management and workers regarding the learning received.

7. Reporting of Concerns

All workers shall make every effort to resolve safety and health concerns with the appropriate supervisor.

If requested, the WSH Representative contacted directly by a worker shall keep the identity of the person who forwarded the concern confidential.

If the concern cannot be resolved by the supervisor, see next step.

8. Procedure for Handling of Concerns

a. First Stage - Direct Resolution

- i. Where a safety and health concern has been identified, the worker and supervisor shall attempt to remedy or resolve the matter.
- ii. Concerns resolved in this manner should be recorded and forwarded to the WSH Representative for review. It should be recorded in the minutes of the next meeting, although WSH Representative may choose not to record matters of a minor nature.

b. Second Stage - Representative Involvement

- i. Where a satisfactory resolution is not achieved in Stage 1, the WSH Representative shall ensure the concern is placed on the agenda of the next regular WSH Representative safety meeting with Senior Management for the purpose of resolving the concern.
- ii. The matter shall be placed on the agenda of each successive meeting until it is resolved. Beside the agenda item shall be placed the date on which the concern first arose.
- iii. All workers and management shall cooperate with WSH Representative in resolving the concern.

c. Third Stage - Outside Assistance

- i. If WSH Representative is unable to resolve the concern, they shall request assistance from the Workplace Safety and Health Branch. They may also request assistance from other appropriate consultation services. While it is preferable that management and WSH Representative agree with the request for assistance, such an agreement is not required.

9. Examination of Dangerous Conditions

Where a worker believes that a dangerous condition exists in their workplace, an inspection shall be undertaken, or a special meeting shall be held by the WSH Representative and Senior Management, for the purposes of examining the condition and resolving the concern. This provision is in addition to the rights of the worker to refuse dangerous work and to report the dangerous conditions to a Safety and Health Officer under the Workplace Safety and Health Act.

10. Decision or Recommendation of the Workplace Safety and Health Representative

A person who has reported a safety and health concern to the WSH Representative shall be notified of any decisions or recommendations made by WSH Representative relating to their concern.

11. Warning of Dangerous Conditions

Where the WSH Representative and management agrees that a condition existing in the workplace is dangerous or unusually dangerous, or that work required to remedy a condition may itself be dangerous, the

WSH Representative shall so advise all persons at the site or location likely to be affected by the condition or the danger.

#### 12. Response of Management to Concerns

When management receives written recommendations from the WSH Representative, identifying anything that may pose a danger to the safety and health in the workplace, management will respond back to the WSH Representative in writing no later than 30 days after receiving the recommendations.

- a. If management has satisfactorily addressed all recommendations within 30 days of receiving the recommendations, then response in writing is not required.

#### 13. Workplace Inspections

##### a. Importance of Inspections

- i. The ability of the WSH Representative to contribute to the resolution of safety and health concerns at the workplace will be greater if they become informed of the types of tasks performed, and the operating methods used throughout the workplace, as well as the types of hazards and problems which may be encountered in the course of workplace operations.

##### b. Detailed Workplace Survey

The WSH Representative shall carry out safety and health inspections as indicated in the Inspection Policy for the purposes of:

- i. **Familiarization** with the types of tasks performed and the operating methods used throughout the workplace.
- ii. **Identification** of workers' concerns related to safety and health in the workplace.
- iii. **Identification** of safety and health hazards, including working conditions, operating procedures, and technical methods with the objective being the elimination of those hazards.

##### c. Regular Inspections

The WSH Representative must inspect the workplace and the work processes and procedures at least once before each regularly scheduled meeting with management.

#### 14. New Materials Processes, etc.

The WSH Representative shall be advised whenever **Shreem Systems & Solutions Pvt. Ltd.** is planning to introduce into workplace new equipment, changes in operating procedures, new chemicals or other substances or materials with the potential to cause harm.

The WSH Representative shall in turn give priority to considering the safety and health implications of such plans for workers and visitors.

The objective of the WSH Representative should be the recommendation of measures to be incorporated at the same time as the planned introductions.

#### 15. Inspection Visits by Government

The WSH Representative shall accompany a government Safety and Health Officer during any inspection.

They may be joined by the Employer or their designate.

- a. Both the WSH Representative and management designates shall be present during the discussion of the Inspection Report and shall sign the report indicating they have read it.
- b. Copies of the report shall be provided by the Safety and Health Officer to both management and the WSH Representative.

16. Records

a. Minutes

- i. Minutes must be taken at all WSH Representative and Senior Management meetings and shall consist of matters relating to the receipt and disposition of safety and health concerns and other important considerations.
- ii. Original meeting minutes must be kept at the workplace for a period of at least 10 years from the date of the meeting.
- iii. A copy of the minutes shall be posted in a prominent place in the workplace.

b. Posting of Minutes

Minutes of meetings shall be posted on the WSH Bulletin Board within seven days of that meeting and where possible remain posted for not less than one month after the next meeting or until all matters of concern recorded in the minutes have been resolved.

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## 14.2 HEARING CONSERVATION AND NOISE CONTROL POLICY

Scope: All workers

Reference(s): [MB: MR 217/2006 Part 12](#)

[SK: Saskatchewan Occupational Health and Safety Regulations 1996 as amended, Part VIII](#)

\*\* Authorities are jurisdiction dependent: [SK Labour Relations and Workplace Safety](#) | [MB Workplace Safety and Health Branch](#)

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### OBJECTIVES

1. To monitor workplace operations and activities that may produce excessive noise.
2. Ensure noise exposure that could cause hearing impairment is identified, assessed, and controlled.
3. To maintain a hearing surveillance program where workers are exposed to sound levels greater than 80 decibels.

### POLICY

1. Shreem Systems & Solutions Pvt. Ltd. will ensure identify, control and communicate noise exposure that could cause hearing impairment.
2. Ensure hearing education and protection is available for all workers exposed to sound levels greater than 80 dBA(Lex).
3. All worker concerns with regarding to noise must be reported to their supervisor.
4. Sound level testing will be conducted annually, at a minimum, to determine levels throughout the workplace. If noise levels are found to be 80 dBA (Lex) or lower, no hearing controls are required.
5. Where the equivalent sound exposure level is found to be above **80 dBA (Lex)** Shreem Systems & Solutions Pvt. Ltd. will implement a hearing conservation program consisting of the following:
  - a. Ensure hearing protection is available and is provided to workers upon request.
  - b. Monitor noise levels and worker exposure.
  - c. Sound level testing results/report will be posted at the workplace.
  - d. Provide education to workers about the:
    - i. Hazards of exposure to excessive noise and how it can be prevented, and
    - ii. Selection use and care of hearing protection.
6. Where the equivalent sound exposure level is found to be above **85 dBA (Lex)** Shreem Systems & Solutions Pvt. Ltd. will implement the hearing conservation program as well as the following:
  - a. Take all measures as required where noise levels are in excess of 85 dBA (Lex).
  - b. Consult with the WSH Representative to explore methods of reducing the sound exposure level to less than 85 dBA (Lex).
  - c. Enforce wearing of hearing protection.
  - d. Conduct audiometric testing on workers working in areas where the equivalent sound exposure level is greater than 85 dBA (Lex).
  - e. Post signs at all entrances to the work area stating that hearing protection is required.



- f. Complete an annual report of audiometric testing and noise surveillance

## **RECORDS**

Workplace sound records will be kept for at least **ten** years These records must also be made available at the request of the Workplace Safety and Health Authorities\*\*.

## **POLICY REVIEW**

Shreem Systems & Solutions Pvt. Ltd. and the WSH Representative will review the effectiveness of this policy and all components of the safety management system in its entirety every three years at a minimum.

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#### **14.2.1 HEARING CONSERVATION PROCEDURE**

Scope: All workers

Reference(s): MR 217/2006 Part 12

**SK: Saskatchewan Occupational Health and Safety Regulations 1996 as amended, Part VIII**

\*\* Authorities are jurisdiction dependent: [SK Labour Relations and Workplace Safety](#) | [MB Workplace Safety and Health Branch](#)

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#### **OBJECTIVES**

1. To monitor workplace operations and activities that may produce excessive noise.
2. Ensure noise exposure that could cause hearing impairment is identified, assessed, and controlled.
3. To maintain a hearing conservation program where workers are exposed to sound levels greater than 80 decibels.
4. Audiometric testing where workers are exposed to sound levels greater than 85 decibels.

#### **NOISE LEVEL TESTING PROCEDURE:**

1. To ensure noise level testing is consistent in the workplace, use an agreed upon testing method.
2. Documentation of time, location, distance from noise source and description of activity will be included with the average decibel, results are to be documented.
3. If noise level is above 80 dB, a subsequent test will be completed by a professional.
4. Until professional testing can be completed, each worker exposed to over 80 dBA will be included in the hearing conservation program.

#### **AUDIOMETRIC TESTING**

1. Shreem Systems & Solutions Pvt. Ltd. will engage a physician, an audiologist, or a licensed industrial audiometric technician to conduct an audiometric test for every worker who is, or is likely to be, exposed to an equivalent sound exposure level of greater than 85 dBA (Lex). This must take place within 6 months after a worker is initially exposed to that noise level; and every second year thereafter.
2. The results of audiometric testing will be evaluated by a health care professional (physician, audiologist, or registered L.I.A.T.) to determine if there needs to be further assessment. If the results are abnormal, the worker must be referred to a physician or audiologist to determine whether there has been any hearing loss, and whether the loss is the result of sound exposure inside or outside the workplace. Shreem Systems & Solutions Pvt. Ltd. will obtain a report from the physician or audiologist, complete with recommendations, and provide a copy to the worker.
3. An annual report of audiometric testing and noise surveillance is prepared as required under the Hearing Conservation and Noise Control Regulation and is distributed to the WSH Representative, the Workplace Safety and Health Authorities and is posted on the Workplace Safety and Health Bulletin Board.
4. Details of the annual report must include sound control measures taken and statistics on the number of workers:
  - a. Whose hearing was assessed,
  - b. Who were referred to a physician or audiologist,
  - c. Who were found to have no hearing loss,

- d. Who were found to have hearing loss,
  - e. Who had hearing loss resulting from non-work exposure, and
  - f. Who had hearing loss resulting from work exposure.
5. The annual report *must not* contain confidential medical information.

## **RECORDS**

1. Worker health records will be produced and will include the results of audiometric testing, any health history and opinions about a worker's hearing loss conducted by a physician, audiologist or industrial audiometric technician. The report will also include prepared results of audiometric testing, any health history, opinions about a worker's hearing loss conducted by a physician, or audiologist as a result of a referral and the report prepared.
2. Workplace sound records will be produced and will include the results of the workers' equivalent sound level exposure, the hearing surveillance program annual report, and any variance issued by the Chief Occupational Medical Officer to annual audiometric testing. Also included will be the physician's or audiologist's interpretation (not medical data) of referrals made for assessment of hearing loss.
3. Workplace sound records will be kept for at least **10 years** after the record is made. These records must also be made available at the request of the Workplace Safety and Health Authorities.

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### 14.3 LOCKOUT/TAGOUT POLICY AND PROCEDURE

Scope: Applies to all Employees, Contracted Employers and Self-Employed Persons

Reference(s): Manitoba Regulation 217/2006 Part 16

**SK:** Saskatchewan Occupational Safety and Health Regulations 1996 as amended Section 139,246,

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**THE RULE IS: ONE EMPLOYEE, ONE LOCK, ONE KEY!**

#### **POLICY**

Failure to follow this policy and procedures could cause serious harm or death. Therefore, failure to appropriately isolate equipment, to properly lockout and tag controls or inappropriate removal of locks or tags, will result in disciplinary action.

1. No employee or any other person may work on equipment unless the equipment is secured against incidental start up, movement, or release of electrical, mechanical, hydraulic, pneumatic, chemical, or thermal energy.
2. Each employee required to regularly lockout shall be issued personal locks with I.D. tags and keys which shall only be used for lockout procedures.
3. Employees must not borrow another person's lock, nor allow another person to borrow his/her assigned lock. If additional locks are required, contact the Supervisor.
4. A designated person, and ONLY that person, must keep the duplicate key. The designated person may remove the lock in an emergency, provided that the key used to lock the lock is not available and it is safe to remove the lock. The employee who locked out the machine must be advised that his/her lock has been removed and a logbook must be kept to record the use of the duplicate key. The designated person is responsible to ensure they have updated the logbook.
5. Only the person who installed a lockout lock shall remove it.
6. Tags DO NOT suffice as effective lockout and must only be used along WITH lockout locks.
7. All outside Employees such as contractors and self-employed persons shall follow company lockout procedures and must use company locks assigned to him/her unless they have their own suitable locks.

#### **LOCKOUT PROCEDURES – GENERAL**

1. Notify all affected employees that servicing, or maintenance is required on a machine or equipment; and that the machine or equipment must be shut down and locked out.
2. The authorized employee shall identify the type and magnitude of the energy that the machine or equipment utilizes, shall understand the hazards of the energy and shall know the methods to control the energy. If the employee has any uncertainty, they must contact their Supervisor prior to proceeding with work.
3. If the machine or equipment is operating, shut it down by the normal stopping procedure (depress the stop button, open switch, close valve, etc.).
4. De-activate the energy isolating device(s) so that the machine or equipment is isolated from the energy source(s).
5. Lockout the energy isolating device(s) with assigned lock(s) and I.D. tag on the lock.
6. Stored or residual energy (such as that in capacitors, springs, elevated machine members, rotating flywheels, hydraulic systems, and air, gas, steam, or water pressure, etc.) must be dissipated or restrained by the appropriate methods such as grounding, repositioning, blocking, bleeding down, etc..

7. Ensure the equipment is disconnected from the energy source(s) by first checking that no employees are exposed, then verify the isolation of the equipment by operating the push button or other normal operating control(s), or by testing to make certain the equipment will not operate.
8. Return operating control(s) to neutral or "off" position after verifying the isolation of the equipment.
9. The machine or equipment is now locked out.
10. The key must remain with the last employee involved in performing the repairs or maintenance.

### **Restoring Equipment to Service**

When the servicing or maintenance is completed and the machine or equipment is ready to return to normal operating condition, the following steps shall be taken.

1. Check the machine or equipment, and the immediate area around the machine ensure that nonessential items have been removed and that the machine or equipment components are operationally intact.
2. Check the work area to ensure that all employees have been safely positioned or removed from the area.
3. Verify that the controls are in neutral.
4. Remove the lockout devices and reenergize the machine or equipment. Note: The removal of some forms of blocking may require re-energizing of the machine before safe removal.
5. Notify affected employees that the servicing or maintenance is completed and that the machine or equipment is ready for use.

### **Multiple Employees**

1. If more than one person is working on a machine or system, all other persons are required to attach their personal locks to the lockout device.
2. The person applying the first lock in a lockout procedure is responsible to immediately test to ensure that the locked out machinery or system cannot be operated.
3. Each employee must remove their own lock when the maintenance procedure is completed.  
**\*\*Employees are forbidden to remove a lock belonging to another employee\*\***
4. Where more than one lock has been used in a lockout procedure, the removal of the last lock is a serious act. Prior to removing the last lock, the employee is responsible to ensure that the machinery or system can be operated safely without endangering any other person.

### **POLICY REVIEW**

Shreem Systems & Solutions Pvt. Ltd. and the WSH Representative will review the effectiveness of this policy and all components of the safety management system in its entirety every three years at a minimum.

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#### **14.4 WORKING ALONE OR IN ISOLATION POLICY**

Scope: Applies to all workers, contracted employers and self-employed persons

Reference(s): MR 217/2006 Part 9, Code of Practice for Workers Working Alone or in Isolation

SK: Saskatchewan Occupational Health and Safety Regulations 1996 Part III, Section 35

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#### **DEFINITIONS**

**“Working alone”** means the performance of any work function by a worker who

- a. Is the only worker for that employer at the workplace at any time, and
- b. Is not directly supervised by the employer, or another person designated as a supervisor by the employer, at any time.

**“Working in isolation”** means working in circumstances where assistance is not readily available in the event of injury, ill health or emergency.

#### **POLICY**

1. Shreem Systems & Solutions Pvt. Ltd. will identify the risks from the conditions and circumstances of the worker’s work while working alone or in isolation.
2. Shreem Systems & Solutions Pvt. Ltd. will, so far as reasonably practicable, take steps to eliminate or reduce the identified risks to workers working alone or in isolation.
3. Safe Work Procedures will be developed, communicated and implemented when the identified risk cannot be eliminated.
4. All workers, who may be affected, will be trained in the Safe Work Procedures.

#### **WORKING ALONE PROCEDURE**

The company will implement and maintain a Working Alone Procedure to protect the safety and health of all workers who may be working alone or in isolation, so far as is reasonable and practical. The plan must include;

- a. Establishment of an effective communication system;
- b. A means of securing assistance for a worker who is working alone in the event of illness or injury;
- c. Where applicable, the provision of emergency supplies for use in travelling or working under conditions of extreme cold or other inclement weather; and
- d. Depending on the severity of the risk, the procedure to include the following;
  - i. A system of regular contact by the employer with the worker working alone or in isolation,
  - ii. The establishment of training requirements,
  - iii. The communication of limitations on or prohibitions of specified activities. For example;
    - Certain types of electrical work require a safety watch or a first aider,
    - Entry into confined spaces under specified hazardous conditions,

- Where there is a hazard of drowning,
- Repairs/maintenance work on a machine which cannot reasonably be locked out,
- Working at heights requiring a full body harness and lanyard

#### **POLICY REVIEW**

Shreem Systems & Solutions Pvt. Ltd. and the WSH Representative will review the effectiveness of this policy and all components of the safety management system in its entirety every three years at a minimum.

#### **14.4.1 WORKING ALONE OR IN ISOLATION PROCEDURE**

Scope: Applies to all workers, contracted employers and self-employed persons

Reference(s): MR 217/2006 Part 9, Code of Practice for Workers Working Alone or in Isolation

**SK: Saskatchewan Occupational Health and Safety Regulations 1996 Part III, section 35**

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#### **PROCEDURES**

##### **Working Alone: Away from the Office/Shop**

All workers working alone/in isolation or away from the office/shop on company business must:

1. Notify their supervisor and know the designated contact person.
2. Notify their contact person of their intention to work alone, their destination and itinerary for the day. Should the itinerary change during the day, the changes must be communicated to the contact person.
3. Carry a cell phone and charger.
4. Check in with contact person every 4 hours at minimum, this frequency may be shorter if the work is higher risk.
5. Notify the contact person when the work is complete.
6. Read, understand and agree to the working alone or in isolation plan specific to the jobsite.

##### **Overdue Worker**

1. Management will be responsible to locate or contact workers who fail to report on time.
2. If the worker working alone fails to check in, or calls with an emergency, the designated contact person will immediately inform the worker's supervisor.
3. Arrangements will be immediately made to proceed to the worker's location. If necessary, the supervisor will call 911.
4. Management will be notified of the situation.



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#### **14.5 WORKPLACE HAZARDOUS PRODUCTS INFORMATION SYSTEM (WHMIS) POLICY**

Scope: Applies to all workers, contracted employers and self-employed persons

Reference(s): MR 217/2006 Part 35 and Part 36, WHMIS Guideline

SK: Saskatchewan Employment Act 2014, Part III, Division 7; Saskatchewan Occupational Health and Safety Regulations 1996 Part XXI; The Occupational Health and Safety (Workplace Hazardous Materials Information System) Regulations

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#### **OBJECTIVES**

1. To reduce the risks associated with hazardous/controlled products and restricted consumer products in the workplace.
2. Ensure workers working with, or who may be exposed to hazardous/controlled products and/or restricted consumer products:
  - a. Are aware of the associated hazards,
  - b. Know how to protect themselves from the hazards,
  - c. Know what to do in the case of an emergency,
  - d. Know where to find additional information on the hazards.

#### **POLICY**

1. Shreem Systems & Solutions Pvt. Ltd. prohibits the use, storage, or handling of any hazardous/controlled product unless all requirements of this policy are met.
2. Training
  - a. All workers shall receive WHMIS training and education prior to working with or being exposed to hazardous/controlled products and/or restricted consumer products. Training shall be workplace specific and should result in all workers being able to apply the knowledge. Training must be provided on the following:
    - i. General WHMIS information with respect to both supplier and workplace labels, classification and Safety Data Sheets (SDS),
    - ii. Hazards of specific products with which they are working (or near),
    - iii. Safe Work Procedures and PPE for specific products with which they are working, and
    - iv. What to do in the case of an emergency. (e.g. spill or exposure)
  - b. Training must include workers responsibilities including the following;
    - i. Must read and understand labels on any hazardous/controlled and restricted consumer product they use,
    - ii. Place workplace labels on all hazardous/controlled or restricted consumer products they decant, and
    - iii. Know where Safety Data Sheets (SDS) are located and understand how to use them.
  - c. Follow all applicable Safe Work Procedures and wear all personal protective equipment provided when working with hazardous/controlled products;
3. Audit
  - a. The effectiveness of the WHMIS program shall be reviewed annually or sooner if there is a change in work conditions or hazard information by management and worker representative including:

- i. Proper labels are in place,
  - ii. SDS are available and current,
  - iii. Inventories and records are up to date, and
  - iv. The effectiveness of worker training.
4. Records of worker education and training must be maintained.
5. Supplier Labels
  - a. All hazardous/controlled products must have a legible supplier label. If a supplier label is not present upon the delivery, the hazardous/controlled product must be either returned to the supplier or locked up until a supplier label is received.
  - b. Supplier labels must not be removed, defaced, or modified if any amount of hazardous/controlled product remains in the container in which it was received. If the supplier label is removed or is no longer legible, it may be replaced with a workplace label.
6. Workplace Labels
  - a. Where supplier labels are damaged, or hazardous/controlled products are decanted into other containers, a workplace label must be applied and must contain the following information:
    - i. A product identifier,
    - ii. Safe handling information, and
    - iii. A reference to the availability of the SDS.
7. Inventory
  - a. An inventory of hazardous/controlled products must be developed and maintained. The inventory list must be updated within 15 days of a new substance being introduced into the workplace.
8. Safety Data Sheets (SDS)
  - a. SDS must all be:
    - i. Present for all hazardous/controlled products.
    - ii. Readily available to all workers who may be exposed to hazardous/controlled products.
    - iii. Retained for a period of **30 years** from last use.
    - iv. Readily available to the WSH Representative, to qualified first aiders and to emergency medical services.

## **POLICY REVIEW**

Shreem Systems & Solutions Pvt. Ltd. and the WSH Representative will review the effectiveness of this policy and all components of the safety management system in its entirety every three years at a minimum.

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#### **14.6 CONTRACTED EMPLOYERS AND SELF-EMPLOYED PERSONS POLICY**

Scope: Applies to all workers, contracted employers and self-employed persons

Reference(s): MB: Workplace Safety and Health Act, Section 7.4 (5) (g), MR 217/2006, Part 2.4(2)

**SK: Saskatchewan Employment Act 2014 Part II section 5, 6; Saskatchewan Occupational Health and Safety Regulations, section 15, 16**

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Shreem Systems & Solutions Pvt. Ltd. will strive to ensure the safety of contracted employers and self-employed persons. Care must be taken in the evaluation, selection, and monitoring of contracted employers as their actions and omissions will impact all at the workplace.

Contracted employers and self-employed persons performing work in our workplace must contribute positively to safety and health in our workplace and preventing workplace incidents. Therefore, they have the following responsibilities:

#### **POLICY**

1. When a construction project involves more than one employer or self-employed person, and Shreem Systems & Solutions Pvt. Ltd. does not contract with someone else to coordinate and manage work on a construction project, then Shreem Systems & Solutions Pvt. Ltd. assumes the responsibilities of the prime contractor. The prime contractor is legally responsible for:
  - a. ensuring the person involved in the work project meets their legal safety and health obligations
  - b. coordinating, organizing and monitoring work on the project to ensure reasonable and practical precautions are in place to effectively control safety and health hazards
2. Potential contractors and subcontractors shall, as part of the tendering process, submit to Shreem Systems & Solutions Pvt. Ltd. a completed Contractor Safety Evaluation. If a contractor or a subcontractor does not have a Safety Management System that meets company standards, then they must be orientated to and follow the Shreem Systems & Solutions Pvt. Ltd. 's Safety Management System.
3. Only contractors and self-employed persons, who have been approved and have signed a Contracted Worker Safety Agreement, shall conduct work for Shreem Systems & Solutions Pvt. Ltd.
4. Contracted employers and self-employed persons shall be responsible for taking every reasonable precaution on the project to ensure the safety of all workers, visitors and the general public on a jobsite and notifying Shreem Systems & Solutions Pvt. Ltd. if they are bringing new workers or trades onto the site.
5. All contractors and subcontractors undertaking work with Shreem Systems & Solutions Pvt. Ltd. shall, as part of their contract, agree to comply with all Shreem Systems & Solutions Pvt. Ltd. safety policies and procedures.
6. All contractors and subcontractors shall comply with the provincial health and safety Legislation and Regulations
7. All contractors and self-employed persons must report to the Shreem Systems & Solutions Pvt. Ltd.'s designate to complete a Job Safety Orientation prior to beginning work.
8. Shreem Systems & Solutions Pvt. Ltd. shall designate one of its workers to be the Project Supervisor to monitor and enforce our Safety Management System and act as a liaison between the contracted workers and self-employed workers and the company.

Shreem Systems & Solutions Pvt. Ltd. as the Prime Contractor has a legal obligation to ensure that every person working on the project complies with our safety requirements and the Occupational Safety and Health legislation. Therefore, we accept the following responsibilities:

- a. To establish an effective system to ensure that all parties involved in our construction projects meet safety and health requirements and that they have the necessary knowledge to ensure that everyone returns home safe at the end of the workday and work is performed efficiently.
- b. Coordinate, organize and monitor work on our construction projects to ensure reasonable and practical precautions are in place to effectively identify, communicate and control safety and health hazards to all the parties.
- c. Ensure sub-contractors:
  - i. Are evaluated and monitored so that they contribute to a safe and healthy work environment for all,
  - ii. Receive an orientation to Shreem Systems & Solutions Pvt. Ltd. Safety Management System requirements and the worksite before work commences and,
  - iii. Are held accountable to Shreem Systems & Solutions Pvt. Ltd.'s company safety policies, procedures and rules and,
  - iv. Provide evidence that their workers will be supervised by a competent person, including the name(s) of such supervisors.
  - v. Provide Safe Work Plans and Procedures to Shreem Systems & Solutions Pvt. Ltd. relevant to their tasks so that they may be reviewed and,
  - vi. Provide a WCB Clearance Letter prior to any work commencing, and
  - vii. Provide copies of all relevant training records for tasks and employees involved, and
  - viii. Provide a Certificate of Liability Insurance prior to any work commencing
- d. The prime contractor shall establish a committee at a construction project site if
  - i. at least 20 workers are involved, or expected to be involved, in work on a construction project; and
  - ii. the project is expected to require more than 90 days to complete.

### **POLICY REVIEW**

Shreem Systems & Solutions Pvt. Ltd. and the WSH Representative will review the effectiveness of this policy and all components of the safety management system in its entirety every three years at a minimum.

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## **14.7 OPERATOR TRAINING**

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Shreem Systems & Solutions Pvt. Ltd. recognizes that the operation of powered lift trucks (forklifts), mobile elevating work platforms and heavy equipment (skid steer, excavator) know as critical equipment, requires some expertise not associated with regular vehicles. There are also some inherent risks involved because of the sheer power and reach of the equipment being operated. For this purpose, Shreem Systems & Solutions Pvt. Ltd. will require that each operator be competent in the operation of each piece of equipment they are expected to operate. As a company we will meet or exceed the Workplace Health and Safety Regulations of Manitoba and adopt, Codes of Practice and industry best practices wherever possible. To this end the operational requirements in this document will be adopted as the only acceptable operating standard for mobile equipment owned or rented and operated by our workers.

### **Competency of equipment operators**

A worker must not operate powered mobile equipment unless the worker:

- a) has received adequate instruction in the safe use of the equipment and
- b) has demonstrated to a supervisor or instructor, competency in operating the equipment and
- c) is familiar with the operating instructions for the equipment, and
- d) is familiar with the Provincial Legislation for operation of powered mobile equipment
- e) has a certificate of training from an approved agency or inhouse training from a competent trainer for the specific piece of equipment that the worker is expected to operate

In the event of an incident or near miss where the cause might have been the result of operator error the operator will have to be re-evaluated in a manner similar to initial certification. This evaluation will be performed by a competent operator with a valid certificate and/or a competent trainer.

Refresher training will also be required any time new equipment is to be used, performance issues become evident, or there are significant changes in the operator's job.

### **Forklifts**

To maintain our mandate of meeting or exceeding the Workplace Health and Safety Regulations of Manitoba all employees at Shreem Systems & Solutions Pvt. Ltd. who are expected to operate a forklift will be required to:

- i. participate in a full course of instruction for forklift operators to meet the requirements of Manitoba Regulation 217/2006 Part 22.29(2).
- ii. Not operate a forklift without valid certification issued by Shreem Systems & Solutions Pvt. Ltd..

### **Mobile Elevated Work Platforms**

To maintain our mandate of meeting or exceeding the Workplace Health and Safety Regulations of Manitoba all employees at Shreem Systems & Solutions Pvt. Ltd. who are expected to operate a mobile elevated work platform will be required to:

- i. participate in a full course of instruction for mobile elevated work platform to meet the requirements of Manitoba Regulation 217/2006 Part 28.37.

- ii. recertification will be required for all mobile elevated work platform operators at a minimum every 5 years or sooner if deemed necessary

### **Heavy Equipment**

To maintain our mandate of meeting or exceeding the Workplace Health and Safety Regulations of Manitoba all employees at Shreem Systems & Solutions Pvt. Ltd. who are expected to operate heavy equipment will be required to:

- i. participate in a full course of instruction for the specific piece of heavy equipment that the worker is expected to operate.
- ii. recertification will be required for all heavy equipment operators at a minimum every 5 years or sooner if deemed necessary

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## **14.8 MUSCULOSKELETAL INJURIES (MSI) POLICY**

Scope: Applies to all workers, contracted employers and self-employed persons

Reference(s): MR 217/2006 Part8, Manitoba Workplace Safety and Health Branch's Ergonomic Guidelines (version 1.2)

**SK: Saskatchewan Occupational Health and Safety Regulations Part 6 Section 81**

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### **OBJECTIVE**

Shreem Systems & Solutions Pvt. Ltd. will strive to eliminate or minimize risks leading to musculoskeletal injury at work. This requires employers ensure that procedures are implemented for musculoskeletal injury prevention. Musculoskeletal Injury is one of the most common and costly injuries for organizations; these injuries are often chronic, and as such, compensation costs may be incurred over the life of the worker.

### **DEFINITION**

Musculoskeletal injury (MSI) is "an injury or disorder of the muscles, tendons, ligaments, joints, nerves, blood vessels or related soft tissue including a sprain, strain and inflammation, that may be caused or aggravated by work." MSI is sometimes also referred to as work-related musculoskeletal disorder, cumulative trauma disorder, repetitive strain injury, or activity-related soft tissue disorder. MSI typically affects the back, neck, shoulders, elbows, wrists, hands, knees, or ankles. It usually develops over time as a result of one or more of the following risk factors:

1. Force
2. Repetition
3. Awkward posture
4. Static posture
5. Contact stress

### **POLICY**

Shreem Systems & Solutions Pvt. Ltd. aims to provide a safe and healthy work environment for its workers by ensuring that risk factors that may contribute to the development of musculoskeletal injuries are identified, assessed and eliminated or mitigated.

Shreem Systems & Solutions Pvt. Ltd. will establish a process to ensure all managers and supervisors are accountable for MSI prevention in their areas. Ensure the risks of MSI, as reasonably practicable, are identified, assessed, and controlled for all jobs. Shreem Systems & Solutions Pvt. Ltd. will ensure consultation with the WSH Committee, and workers regarding MSI prevention, when required.

All workers will comply with, and actively participate in, all aspects of the MSI prevention policy and follow MSI prevention practices. Workers will report risks of MSI and any signs and symptoms of MSI.

#### Training

All workers shall receive training and education in identifying and controlling MSI. This training will also include the common signs and symptoms of any MSI associated with the worker's work. Any control measure implemented by the employer will regarding MSI will be communicated to the workers.

### Hazard Identification

An analysis of the workplace is required in order to identify jobs and workstations that may pose MSI hazards. The causes of these hazards must be determined before controls can be identified.

### Development of Controls

Once MSI hazards have been identified, controls must be developed in order to eliminate or reduce these hazards by changing the jobs, workstations, work procedures, tools or environment to fit the worker.

### Medical Management

Medical management is the effective use of available healthcare resources to prevent or manage MSI. A workplace-based medical management program is composed of three aspects:

1. *Injury Prevention*: worker involvement, training and education, and hazard identification and controls,
2. *Injury Management and Early Intervention*: an injured worker is given a professional, timely assessment, and is involved in a return-to-work program,
3. *Chronic Injury*: disability management is required.

## **POLICY REVIEW**

Shreem Systems & Solutions Pvt. Ltd. and the WSH Representative will review the effectiveness of this policy and all components of the safety management system in its entirety every three years at a minimum.



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#### **14.9 HARASSMENT POLICY**

Scope: Applies to all workers, contracted employers and self-employed persons

Reference(s): MB: MR 217/2006 Part 10

**SK: Saskatchewan Employment Act 2014, Section 36**

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Shreem Systems & Solutions Pvt. Ltd. is committed to ensuring that all employees and associates are protected in their rights to work in an environment free from all forms of discrimination, including sexual harassment. Harassment will not be tolerated. If any worker believes they are being harassed, we encourage them to exercise their rights and follow the Company's Harassment Policies and Procedures.

#### **Definition of Harassment**

"Harassment" means:

- a. Objectionable conduct that creates a risk to the health of a worker;
- b. Any unwelcome comment or conduct, or words or actions that disparage or cause humiliation, offense or embarrassment to another person; or
- c. Severe conduct that adversely affects a worker's psychological or physical well-being.

#### **Interpretation: "harassment"**

For the purpose of the definition "harassment", conduct is

- a. Discrimination or Objectionable, if it is based on race, creed, religion, colour, sex, sexual orientation, sex-determined characteristics, gender, marital status, family status, source of income, political belief, political association, political activity, physical or mental disability, social disadvantage, age, nationality, ancestry or place of origin; or **(SK physical size or weight)**
- b. Severe, if it could reasonably cause a worker to be humiliated or intimidated and is repeated, or in the case of a single occurrence, has a lasting, harmful effect on a worker.

For the purpose of the definition "sexual harassment", includes, but is not limited to

- a. Unwelcome sexual flirtation, advances, propositions or gestures
- b. Verbal harassments such as jokes and innuendos
- c. Graphic, verbal comments about an individual's physical characteristics or clothing
- d. Inappropriate displays of sexual pictures or materials
- e. Intention, unwanted physical contact
- f. Sexual assault as defined under the Criminal Code
- g. A reprisal or threat of reprisal for rejection of a sexual solicitation or advance.

Reasonable conduct of an employer or supervisor in respect of the management and direction of workers or the workplace is not harassment.

In this section and in the definition "harassment", conduct includes a written or verbal comment, a physical act or gesture or a display, or any combination of them.

Every worker is entitled to:

1. A working environment free of harassment
2. File a complaint with the Human Rights Commission

3. Confidentiality when they file a harassment claim
4. Exercise any other legal rights pursuant to any other law

## **POLICY**

1. Shreem Systems & Solutions Pvt. Ltd. in cooperation with our WSH Representative is committed to a healthy, harassment-free workplace.
  - a. The company will deal quickly and effectively with all alleged harassment. Examples of harassment which will not be tolerated are verbal or physical abuse, threats, derogatory remarks, jokes or taunts about any worker's race, gender, appearance, religious beliefs, mental or physical abilities, family status, or source of income. Shreem Systems & Solutions Pvt. Ltd. will not tolerate the display of pornographic, racist, or offensive signs or images or practical jokes that result in awkwardness or embarrassment.
2. Deal with harassment allegations seriously, quickly and confidentially except where disclosure is:
  - i. Necessary to investigate the complaint or take corrective action with respect to the complaint
  - ii. Required by law
3. Shreem Systems & Solutions Pvt. Ltd. expect that everyone will treat other workers with respect, speak up when harassment occurs and report harassment to their supervisor as soon as possible.
4. The Harassment Policy must be posted in a conspicuous place.
5. All workers must be informed of its contents.

## **Additional Rights**

Nothing in this policy prevents or discourages a worker from referring a harassment complaint to the Human Rights Commission. A worker retains the right to exercise any other legal avenues available (e.g. Criminal complaint, civil suit, etc.).

## **POLICY REVIEW**

Shreem Systems & Solutions Pvt. Ltd. and the WSH Representative will review the effectiveness of this policy and all components of the safety management system in its entirety every three years at a minimum.

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#### **14.9.1 HARASSMENT PROCEDURE**

Scope: Applies to all workers, contracted employers and self-employed persons

Reference(s): MR 217/2006 Part 10

**SK: Saskatchewan Employment Act 2014, Section 36**

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#### **PROCEDURE FOR DEALING WITH ALLEGED HARASSMENT**

1. All complaints will be taken seriously. The rights of all concerned will be respected. Workers are encouraged to use the following steps to address incidents of alleged harassment internally:
  - a. A worker who believes that they have been subjected to harassment should not ignore the harassment and first clearly and firmly tell the alleged harasser that the behaviour is unwelcome and must stop. This can be done in person or in writing.
  - b. Where this cannot be done, or is unsuccessful, the worker should report the alleged harassment to and seek guidance from the employer or to one of the following persons designated by the employer to receive complaints of harassment:
    - i. Yesha Thakar, Office Manager
    - ii. Nirmal Thakar, President
  - c. Keep a record of the incidents (dates, times, locations, witnesses, what happened, worker response, etc.). Recording of events is not required to file a complaint, but a record can strengthen the case and help to recall details at a later date.
2. Once a complaint has been received, the employer may contact Shreem Systems & Solutions Pvt. Ltd.'s legal counsel for advice and instructions. Depending on the situation, legal counsel may be required to participate in the investigation.
3. An investigation will begin immediately, and all necessary steps will be taken to resolve the problem.
4. Both the complainant and the alleged harasser will be interviewed, as well as any other persons who may be able to provide credible information.
5. If the investigation reveals evidence to support the complaint of harassment, the harasser will be disciplined in an appropriate manner. Discipline may include suspension or dismissal and the incident will be documented in the harasser's file. No documentation will be placed on the complainant's file where the complaint is filed in good faith.
6. If the investigation fails to find evidence to support the claim of harassment, no record will be placed in the file of the alleged harasser.
7. Regardless of the outcome of a harassment complaint made in good faith, the complainant and anyone providing information will be protected from any form of retaliation by workers or superiors.
8. Following the conclusion of the investigation, the employer will inform the complainant and the alleged harasser of the results of the investigation.

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#### **14.10 VIOLENCE PREVENTION POLICY**

Scope: Applies to all employer(s), owner(s), workers, contracted employers and self-employed persons

Reference(s): MR 217/2006 Part 11

**SK: Saskatchewan Employment Act 2014 section 37**

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#### **DEFINITION**

“Violence” is the attempted or actual exercise of physical force against anyone, or any threatening statement or behavior that gives a person reason to believe that physical force will be used against them.

#### **POLICY**

Workplace violence can have devastating effects on workers’ quality of life and organizational productivity. Violence is against the law and an organization, owner, employer, manager or worker can face charges under the Criminal Code if they are accused of violence.

Shreem Systems & Solutions Pvt. Ltd. is committed to a safe, healthy and rewarding work environment for all workers. Violence will not be tolerated.

This violence prevention policy is not intended to discourage or prevent anyone from exercising any other rights, actions or remedies that may be available under the law. Shreem Systems & Solutions Pvt. Ltd. will take every reasonable precaution necessary to protect our workers from a potential violent situation if we become aware or believe that violence is a risk.

Every worker is entitled to:

1. a working environment free of violence,
2. exercise any other legal rights pursuant to any other law and
3. Confidentiality when they file a violence claim.

Shreem Systems & Solutions Pvt. Ltd. expects all workers to work together in a professional manner and resolve issues in a non-violent manner and follow established procedures for the prevention and reporting of incidents of violence.

Anyone aware of violence, or the potential for violence in the workplace, must bring it to the attention of management so that it can be addressed immediately. Shreem Systems & Solutions Pvt. Ltd. will deal quickly and effectively with all alleged acts of violence.

Shreem Systems & Solutions Pvt. Ltd. will assess the risk of violence to a worker in consultation with the WSH Representative. Any areas that are deemed high risk of violence or specified in Part 11.1 of the Workplace Safety and Health Regulation will ensure a procedure is developed to include the following but not limited to;

- Description of worksite and any particular job functions,
- Measures and procedures for summoning immediate assistance,
- Procedure to follow in reporting an incident,
- Procedure to follow during an investigation,
- Procedure to implement corrective actions,
- Disclosure statement

Shreem Systems & Solutions Pvt. Ltd. will do its utmost to protect the anonymity of those involved in an incident. In the case of a complaint, the name of the complainant will not be disclosed to anyone, other than where the disclosure is;

- a. Necessary in order to investigate the complaint
- b. Required in order to take corrective action in response to the complaint
- c. Required by law

No person who in good faith reports an incident of violence or potential violence or assists with an investigation will be subject to retaliation or discipline. Any person who participates in any such retaliation will be subject to disciplinary action up to and including termination.

Unless prohibited by law, the employer will advise all potentially affected workers at risk of violence as to the nature and extent of the risk. This includes any information in Shreem Systems & Solutions Pvt. Ltd.'s possession, including personal information related to the risk of violence from persons.

Shreem Systems & Solutions Pvt. Ltd. will ensure that measures and procedures in the violence prevention policy are implemented and enforced.

Shreem Systems & Solutions Pvt. Ltd. will prepare an annual violence report that includes the following:

- a. Records of violent incidences to a, or any worker(s) in the workplace.
- b. Results on any investigations of violence incidents, including a copy of recommended control measures taken, changes to the violence prevention policy and any report of a serious incident that was a result of a violent act.
- c. Control measures that were implemented as a result of violent incident investigations.

The annual report will be provided to the WSH Representative.

## **POLICY REVIEW**

Shreem Systems & Solutions Pvt. Ltd. and the WSH Representative will review the effectiveness of this policy and all components of the safety management system in its entirety every three years at a minimum.

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#### **14.10.1 VIOLENCE PREVENTION PROCEDURE**

Scope: Applies to all employer(s), owner(s), workers, contracted employers and self-employed persons

Reference(s): MR 217/2006 Part 11

**SK: Saskatchewan Employment Act 2014 section 37**

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#### **PROCEDURES FOR SUMMONING ASSISTANCE:**

Where there is a risk of violence, Shreem Systems & Solutions Pvt. Ltd. will complete the following steps to ensure the safety of workers:

- a. Unless prohibited by law, advise all potentially affected workers at risk of violence as to the nature and extent of the risk. This includes any information in Shreem Systems & Solutions Pvt. Ltd.'s possession, including personal information related to the risk of violence from persons who have a history of violent behaviour and whom workers are likely to encounter in the course of their work.
- b. If the perpetrator has no direct connection to the organization or a personal relationship with the worker, your direct supervisor will consult management and contact the Police Department.
- c. Any worker or visitor engaged in a violent behaviour will be removed from the premises as quickly as safely permits. They may be banned from access to Shreem Systems & Solutions Pvt. Ltd.'s premises pending the outcome of the investigation and possibly indefinitely

#### **PROCEDURES FOR REPORTING**

1. If there is an immediate risk of violence, take all necessary steps to resolve the situation, including involving external resources (i.e. police).
2. All incidents, threats, attempted or actual violence connected to Shreem Systems & Solutions Pvt. Ltd. or carried out on Shreem Systems & Solutions Pvt. Ltd.'s property, must be reported to your direct supervisor. Note: If your direct supervisor is involved in the act, you must report directly to Yesha Thakar, Office Manager.
3. The worker will file a hazard report form located in the Safety App or in the Office and provide a copy of it to their direct supervisor and the WSH Representative.
4. Workers who have been the victim of violence are encouraged to seek medical attention/treatment or referral for post-incident counseling if appropriate.

#### **PROCEDURES FOR INVESTIGATING**

1. Investigations will commence immediately after a violent incident has occurred.
2. Yesha Thakar, Nirmal Thakar, or their delegate may contact Shreem Systems & Solutions Pvt. Ltd.'s legal counsel for advice and instructions. Depending on the situation, legal counsel may be required to participate in the investigation.
3. The investigation will be conducted by the Office Manager and the WSH Representative.
4. Interview alleged victim and gather all pertinent evidence such as photographs, video surveillance and emails. Focus on specific facts such as date, time, names of person involved or witnesses. It is important

to document the actual words used by the victim or witnesses. If capable, they must fill out their own detailed incident report.

5. Based on the victim's report, create an outline of events and a listing of the potential witnesses to each event.
6. Interview the witness(es).
  - a. Inform the witness that the purpose of the meeting is to investigate a claim made by another worker, they are not the targets of the investigation and their identities will be kept confidential, other than where required by law.
  - b. Explain that there will be no retribution for their sharing of information.
  - c. Witnesses will need to be informed that their interview is a private matter and they are not to disclose the information or nature of the interview to any other person.
  - d. If possible, the interviews will be conducted without disclosing names.
7. Depending on the nature of the complaint and if the alleged perpetrator is a worker, interview them.
8. A decision whether or not a violent act was committed will be made depending on the outcome of the interviews and evidence. Management will decide how to proceed with disciplinary action if necessary.
9. If the review of the incident identifies a risk of violence to workers, control measures and systems must be implemented to eliminate or control the risk. Workers must be advised of the risk of violence, as well as the control measures in place to mitigate those risks. The control measures may include but are not limited to the following:
  - a. Elimination (e.g. worker handles complaints over the phone instead of in person)
  - b. Engineering controls (e.g. physical barrier such as "Plexiglas" window placed between customer service rep and the customer)
  - c. Administrative controls (e.g. training and working alone policies)

## **EXTERNAL COMPLAINTS**

Nothing in this policy prevents or discourages a worker from referring a violence complaint to the appropriate legal authority, City Police or the RCMP, which ever has jurisdiction. A worker retains the right to exercise any legal avenues available.

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#### **14.11 VULNERABLE WORKER POLICY**

Scope: Applies to all workers

Reference(s): The Human Rights Code Clauses 12-18

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Shreem Systems & Solutions Pvt. Ltd. recognizes the need to ensure a safe and healthy workplace for all workers, especially those who are statistically more vulnerable to hazards in the workplace.

A **Vulnerable Worker** is defined as having one or more of the following traits:

- new to Canada,
- a young worker (15-24),
- an aging worker,
- a person with limited literacy or a language barrier, or
- a person with a physical or mental disability.

Studies show workers with these traits are statistically more likely to be injured at work.

New hires are also more vulnerable to the hazards present at the workplace however they are not normally considered vulnerable as onboarding, orientation, and training are designed to help mitigate the risks and control them effectively following a temporary adjustment period.

Workers will be given an opportunity to self-identify as a vulnerable worker at orientation. If a worker self-identifies as vulnerable, they will meet with their supervisor, to discuss what accommodations will be needed to ensure they can work safely. These accommodations will be reviewed periodically to ensure they are effective. A worker may identify later if they believe they need extra support or their situation changes. (e.g. aging worker, become disabled, etc.) The goal is to have all workers have the knowledge, equipment, training and support needed for them to work safely.

Shreem Systems & Solutions Pvt. Ltd. commits to accommodate as far as reasonably practicable. Accommodations will be given to all workers who need it, as it is not only the legal duty, but the right thing to do. Examples of the accommodations to be provided are but not limited to the following:

- Inclusive signage (pictograms and pictures instead of or in addition to words),
- Information and/or training in another language,
- Appropriate personal protective equipment to fit the individual (other than footwear),
- Work site accommodations such as visual alarms, ambidextrous tools, etc.,
- Additional training and job shadowing/mentoring as needed to ensure competency.

Shreem Systems & Solutions Pvt. Ltd. has developed the emergency response plans and procedures in consideration of our current needs of the identified vulnerable workers. Further changes will be made if additional vulnerable workers are hired to or as more effective means are required.

Shreem Systems & Solutions Pvt. Ltd. will not identify or label a worker as vulnerable; as age, medical details and background are not a factor in the hiring process as this would be considered discrimination. In the case a worker not self-identifying, Shreem Systems & Solutions Pvt. Ltd. will aim to have critical information delivered with the support and accommodations listed above as the primary methods of operating.