



ESI SAFETY INC.

OCCUPATIONAL HEALTH AND SAFETY PROGRAM



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DIRECTOR'S STATEMENT

COMMITMENT TO HEALTH AND SAFETY

At ESI Safety Inc., the health, safety, and wellbeing of our employees, clients, and visitors are of paramount importance. As Director, I am personally committed to ensuring our company maintains the highest standards of occupational health and safety in all aspects of our operations.

Our company's mission is to provide expert occupational health and safety services to our clients. To effectively deliver on this mission, we must first exemplify these principles within our own organization. This means creating and maintaining a workplace that is free from recognized hazards and fostering a culture where safety is everyone's responsibility.

I pledge that ESI Safety Inc. will:

- Comply with all applicable health and safety legislation and regulations
- Provide necessary resources to implement and maintain effective health and safety programs
- Ensure all employees receive appropriate training to safely perform their duties
- Regularly review and continuously improve our health and safety management systems
- Promptly address any safety concerns raised by employees or clients
- Maintain open communication regarding health and safety matters
- Lead by example in demonstrating safe work practices

Additionally, I want to make it unequivocally clear that ESI Safety Inc. has zero tolerance for workplace violence and harassment. Every employee has the right to work in an environment that promotes respect, dignity, and professionalism. Any form of violence, harassment, discrimination, or threatening behavior will not be tolerated.

I encourage all employees to actively participate in our health and safety initiatives and to speak up if they observe unsafe conditions or behaviors. Your input is invaluable in our collective effort to maintain a safe and healthy workplace.

By signing below, I affirm my personal commitment to these principles and my responsibility for ensuring they are upheld throughout ESI Safety Inc.

Sincerely,

Mathews, C
Director, ESI Safety Inc.

Date: April 28, 2025

2. HEALTH AND SAFETY POLICY

Sl. No.	Prepared by	Approved by	Revision Date	Published date
1.	Health and Safety Department	Mathews, C Director, ESI Safety	New Program	April 28, 2025



HEALTH AND SAFETY POLICY

PURPOSE

This policy establishes ESI Safety Inc.'s commitment to providing a safe and healthy work environment for all employees, contractors, clients, and visitors in accordance with the Ontario Occupational Health and Safety Act (OHSA) and applicable regulations.

SCOPE

This policy applies to all employees, contractors, and visitors at ESI Safety Inc. premises and to all ESI employees conducting work at client sites.

POLICY STATEMENT

ESI Safety Inc. is committed to:

1. Complying with all applicable health and safety legislation, regulations, and standards
2. Identifying and controlling workplace hazards
3. Providing proper equipment, training, and supervision to ensure safe work practices
4. Establishing and maintaining a Joint Health and Safety Committee (JHSC) as required by law
5. Ensuring regular workplace inspections are conducted
6. Investigating all incidents and implementing corrective actions
7. Continuously improving our health and safety management system

RESPONSIBILITIES

Management Responsibilities:

- Provide a safe and healthy workplace
- Establish and maintain a health and safety program
- Ensure employees are properly trained
- Supply appropriate protective equipment
- Respond promptly to health and safety concerns
- Conduct regular workplace inspections
- Ensure compliance with health and safety legislation
- Investigate incidents and implement corrective actions

Supervisor Responsibilities:

- Ensure workers follow safe work practices
- Ensure proper use of protective equipment
- Advise workers of potential hazards
- Take every reasonable precaution to protect workers

- Investigate reported hazards and incidents
- Enforce health and safety rules

Worker Responsibilities:

- Work in compliance with health and safety legislation and policies
- Use required personal protective equipment
- Report hazards, incidents, and injuries immediately
- Not remove or disable safety devices
- Not work in a manner that endangers themselves or others
- Participate in health and safety training
- Cooperate in workplace investigations

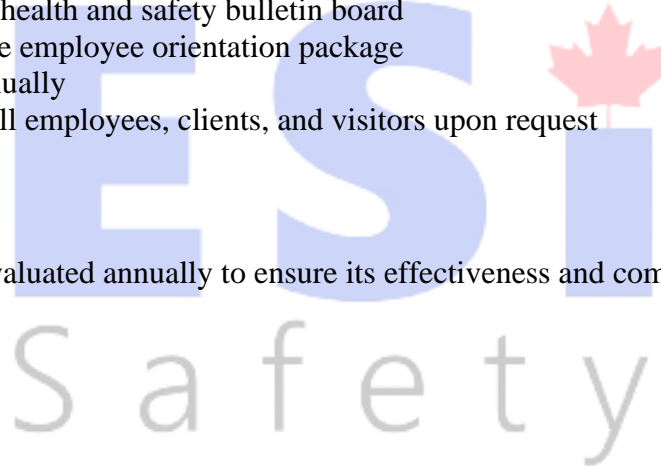
COMMUNICATION

This policy will be:

- Posted on the health and safety bulletin board
- Included in the employee orientation package
- Reviewed annually
- Available to all employees, clients, and visitors upon request

EVALUATION

This policy will be evaluated annually to ensure its effectiveness and compliance with legislation.



3. WORKPLACE VIOLENCE AND HARASSMENT POLICY

Sl. No.	Prepared by	Approved by	Revision Date	Published date
1.	Health and Safety Department	Mathews, C Director, ESI Safety	New Program	April 28, 2025



WORKPLACE VIOLENCE AND HARASSMENT POLICY

PURPOSE

ESI Safety Inc. is committed to providing a work environment free from all forms of violence, harassment, discrimination, and threatening behavior in compliance with the Ontario Occupational Health and Safety Act and the Ontario Human Rights Code.

SCOPE

This policy applies to all employees, contractors, clients, and visitors to ESI Safety Inc. premises and to all work-related activities, including off-site assignments, work-related social functions, and travel.

DEFINITIONS

Workplace Violence: The exercise or attempt of physical force by a person against a worker in a workplace that causes or could cause physical injury, or a statement or behavior that is reasonable for a worker to interpret as a threat to exercise physical force.

Workplace Harassment: Engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome, including sexual harassment.

Sexual Harassment: Engaging in a course of vexatious comment or conduct against a worker because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome, or making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant, or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

Domestic Violence: When a person who has a personal relationship with a worker – such as a spouse or former spouse, current or former intimate partner or a family member – may physically harm, or attempt or threaten to physically harm, that worker at work.

POLICY STATEMENT

ESI Safety Inc.:

1. Will not tolerate any form of violence or harassment in the workplace
2. Will take all reasonable steps to prevent violence and harassment
3. Will respond appropriately to all incidents
4. Will provide a confidential reporting mechanism
5. Will investigate all complaints thoroughly and fairly

6. Will not discriminate or retaliate against anyone for reporting violence or harassment
7. Will provide appropriate support to all affected by workplace violence or harassment

PROCEDURES

Reporting Procedure:

1. Report all incidents of workplace violence or harassment immediately to your supervisor or the Director
2. In cases of immediate danger, remove yourself from the situation and call 911
3. Complete the Workplace Violence/Harassment Incident Report Form within 24 hours
4. Submit the completed form to HR or the Director
5. Cooperate fully with any investigation

Investigation Procedure:

1. All reports will be taken seriously and investigated promptly
2. Investigations will be conducted in a fair, respectful, and confidential manner
3. Both the complainant and respondent will have the opportunity to present their case
4. Relevant witnesses may be interviewed
5. Documentation will be maintained
6. Appropriate corrective actions will be taken
7. Both parties will be informed of the results of the investigation

CONSEQUENCES

Employees who engage in workplace violence or harassment will be subject to disciplinary action up to and including termination of employment. Criminal or civil proceedings may also be initiated against the offender.

SUPPORT RESOURCES

ESI Safety Inc. will provide support to victims of workplace violence or harassment, which may include:

- Employee Assistance Program (EAP)
- Modified work arrangements
- Referrals to external support services
- Assistance with reporting to police if requested

TRAINING

All employees will receive training on:

- Recognizing workplace violence and harassment
- Procedures for reporting incidents

- Company response procedures
- Available support resources

EVALUATION

This policy will be reviewed annually to ensure effectiveness and compliance with legislation.



4. EMPLOYEE SITE VISIT PROTOCOL

Sl. No.	Prepared by	Approved by	Revision Date	Published date
1.	Health and Safety Department	Mathews, C Director, ESI Safety	New Program	April 28, 2025



EMPLOYEE SITE VISIT PROTOCOL

PURPOSE

This protocol establishes guidelines for ESI Safety Inc. employees who travel to and work at client sites to ensure their safety and the quality-of-service delivery.

SCOPE

This protocol applies to all ESI Safety Inc. employees who conduct site visits to client locations including construction sites, manufacturing facilities, offices, and other workplaces.

PRE-VISIT PLANNING

Before visiting any client site, employees must:

1. **Site Information Collection**
 - Obtain site contact information
 - Understand site-specific hazards and controls
 - Review client's safety requirements
 - Obtain site maps/layouts if available
2. **Journey Planning**
 - Plan the most efficient route
 - Check weather and traffic conditions
 - Ensure vehicle is in good working condition
 - Allow adequate travel time between sites
 - Communicate travel itinerary to supervisor
3. **Equipment Preparation**
 - Personal Protective Equipment (hard hat, safety glasses, safety boots, high-visibility vest, etc.)
 - Inspection tools and equipment
 - Communication devices (fully charged)
 - First aid kit
 - Identification and site access credentials
 - Emergency contact information

ARRIVAL PROCEDURES

Upon arrival at a client site, employees must:

1. Report to site security or reception
2. Sign in according to site procedures
3. Participate in site orientation if required
4. Don appropriate PPE before entering work areas
5. Review emergency procedures and exit routes

6. Meet with site contact person

ON-SITE PROTOCOLS

While on client premises, employees must:

1. **Safety Compliance**
 - Adhere to all client site safety rules
 - Respect restricted areas
 - Wear required PPE at all times
 - Report any unsafe conditions observed
 - Do not operate equipment without authorization
2. **Work Performance**
 - Conduct inspections methodically
 - Document findings accurately
 - Take photographs only with permission
 - Maintain confidentiality of observations
 - Consult with site personnel as needed
3. **Communication Requirements**
 - Maintain regular contact with ESI office
 - Notify supervisor of schedule changes
 - Report any incidents immediately
 - Update office when moving between sites

DEPARTURE PROCEDURES

Before leaving a client site, employees must:

1. Summarize findings with site contact if appropriate
2. Return any borrowed equipment or badges
3. Sign out according to site procedures
4. Notify ESI office of departure
5. Confirm next destination

EMERGENCY PROCEDURES

In case of emergency, employees must:

1. Follow site emergency procedures
2. Contact site emergency services
3. Notify ESI supervisor as soon as possible
4. Document the incident
5. Complete incident report within 24 hours

MULTI-SITE VISIT PLANNING

When visiting multiple sites in one day:

1. Plan visits in geographical sequence when possible
2. Allow sufficient time between visits
3. Take required rest breaks
4. Do not exceed maximum daily driving time
5. Contact office if schedule changes

DOCUMENTATION REQUIREMENTS

Employees must maintain:

1. Site visit reports
2. Inspection findings
3. Travel logs
4. Incident reports (if applicable)
5. Client communication records

REVIEW

This protocol will be reviewed annually and updated as needed to reflect changing conditions and best practices.



5. VISITOR POLICY

Sl. No.	Prepared by	Approved by	Revision Date	Published date
1.	Health and Safety Department	Mathews, C Director, ESI Safety	New Program	April 28, 2025



VISITOR POLICY

PURPOSE

This policy establishes procedures for managing visitors to ESI Safety Inc. premises to ensure the safety of all persons, protect confidential information, and maintain efficient operations.

SCOPE

This policy applies to all visitors entering ESI Safety Inc. premises, including clients, contractors, vendors, job applicants, delivery personnel, and personal visitors of employees.

DEFINITIONS

Visitor: Any person who is not an employee of ESI Safety Inc. and enters company premises.

Host: The ESI Safety Inc. employee who is responsible for the visitor during their time on company premises.

VISITOR PROCEDURES

Registration Requirements:

1. All visitors must sign in at reception upon arrival
2. Visitors must provide:
 - Full name
 - Company/organization represented (if applicable)
 - Purpose of visit
 - Name of employee they are visiting (host)
 - Arrival time
 - Vehicle information (if parking on premises)
3. Visitors must be issued a visitor badge that must be visibly worn at all times while on premises

Host Responsibilities:

1. Schedule visitor arrivals in advance when possible
2. Inform reception of expected visitors
3. Greet visitors upon arrival or arrange for them to be escorted to meeting location
4. Ensure visitors are aware of emergency procedures
5. Ensure visitors are supervised at all times
6. Escort visitors to restricted areas if necessary
7. Escort visitors back to reception upon completion of visit
8. Ensure visitors sign out and return visitor badges

Restricted Areas:

1. Visitors are not permitted in restricted areas without explicit authorization and escort
2. Restricted areas include:
 - File storage areas
 - Server rooms
 - Employee-only areas
 - Areas containing confidential client information

Safety Briefing:

All visitors must be informed of:

1. Emergency exit locations
2. Assembly points in case of evacuation
3. Restroom locations
4. Areas where PPE is required
5. Any current safety hazards or concerns

CONTRACTOR MANAGEMENT

Contractors must:

1. Provide proof of insurance before commencing work
2. Complete ESI Safety Inc. contractor orientation
3. Sign in and out daily
4. Wear identification at all times
5. Comply with all ESI Safety Inc. health and safety policies

DELIVERY PERSONNEL

1. Delivery personnel should remain in designated receiving areas
2. Staff should assist with moving delivered items to appropriate locations
3. Reception will sign for deliveries when necessary

VISITOR CONDUCT

Visitors must:

1. Comply with all ESI Safety Inc. policies and procedures
2. Follow instructions from ESI Safety Inc. staff
3. Remain with their host unless otherwise authorized
4. Not photograph or record on premises without permission
5. Not remove any ESI Safety Inc. property
6. Not engage in disruptive behavior

UNAUTHORIZED VISITORS

If unauthorized visitors are identified:

1. Staff should politely inquire about the person's purpose
2. Direct them to reception for proper sign-in
3. Contact security or management if the person refuses to comply
4. Document any incidents involving unauthorized visitors

EMERGENCY PROCEDURES

In case of emergency:

1. Hosts are responsible for visitors during evacuations
2. Visitors must follow the same emergency procedures as employees
3. Visitor logs will be used to account for visitors at assembly points

CONFIDENTIALITY

Visitors may be required to sign a Non-Disclosure Agreement before accessing areas where confidential information is stored or discussed.

POLICY VIOLATIONS

Violation of this policy may result in:

1. Immediate removal from premises
2. Restriction of future access
3. Other actions as deemed appropriate by management

REVIEW

This policy will be reviewed annually and updated as needed.

6. INCIDENT REPORTING POLICY

Sl. No.	Prepared by	Approved by	Revision Date	Published date
1.	Health and Safety Department	Mathews, C Director, ESI Safety	New Program	April 28, 2025



INCIDENT REPORTING POLICY

PURPOSE

This policy establishes procedures for reporting, documenting, investigating, and addressing workplace incidents, injuries, illnesses, near misses, and hazards to prevent recurrence and ensure compliance with Ontario's Occupational Health and Safety Act and the Workplace Safety and Insurance Act.

SCOPE

This policy applies to all employees, contractors, and visitors at ESI Safety Inc. premises and all employees conducting work at client sites.

DEFINITIONS

Incident: Any unplanned event that resulted in or could have resulted in injury, illness, damage, or loss.

Near Miss: An unplanned event that did not result in injury, illness, or damage, but had the potential to do so.

Critical Injury: As defined in R.R.O. 1990, Reg. 834: an injury of a serious nature that places life in jeopardy, produces unconsciousness, results in substantial loss of blood, involves the fracture of a leg or arm (but not a finger or toe), involves the amputation of a leg, arm, hand or foot (but not a finger or toe), consists of burns to a major portion of the body, or causes the loss of sight in an eye.

First Aid Injury: An injury that can be treated on the job without causing lost time.

Medical Aid Injury: An injury requiring treatment by a health care professional but does not result in lost time beyond the day of injury.

Lost Time Injury: An injury that results in the injured person being unable to report for work on the next calendar day.

Occupational Illness: A condition that results from exposure in a workplace to a physical, chemical, or biological agent to the extent that normal physiological mechanisms are affected and the health of the worker is impaired.

REPORTING PROCEDURES

Immediate Actions:

1. Ensure the safety of all persons involved
2. Administer first aid if necessary and safe to do so
3. Call emergency services if required (911)
4. Secure the area if there are continuing hazards
5. Notify supervisor immediately

Reporting Timeframes:

1. All incidents, injuries, near misses, and hazards must be reported to a supervisor immediately or as soon as reasonably possible
2. Written incident reports must be submitted within 24 hours of the incident
3. Critical injuries must be reported to the Ministry of Labour, Training and Skills Development immediately
4. Fatalities and critical injuries must be reported to the JHSC, health and safety representative, and trade union (if applicable) immediately

Documentation Requirements:

All incidents require the completion of an Incident Report Form that includes:

1. Name of injured person (if applicable)
2. Date, time, and location of incident
3. Description of what happened
4. Names of witnesses
5. Description of injury or damage
6. First aid or medical treatment provided
7. Immediate causes
8. Root causes
9. Corrective actions recommended
10. Preventive measures implemented

INVESTIGATION PROCEDURES

Investigation Team:

Incidents will be investigated by:

1. The supervisor of the area or function
2. A member of the JHSC or health and safety representative
3. A management representative
4. Subject matter experts as needed

Investigation Process:

1. Secure the incident scene
2. Collect physical evidence
3. Take photographs
4. Interview witnesses
5. Review relevant documents (training records, maintenance logs, etc.)
6. Identify immediate and root causes
7. Develop recommendations for corrective action
8. Prepare investigation report

Reporting to Authorities:

The following incidents must be reported to the Ministry of Labour, Training and Skills Development:

1. Fatalities and critical injuries - immediately by telephone, written report within 48 hours
2. Occupational illnesses - within 4 days
3. Other prescribed incidents - within 4 days

CORRECTIVE ACTIONS

1. Corrective actions will be developed based on investigation findings
2. Actions will be assigned to specific individuals with due dates
3. Implementation will be monitored by management
4. Effectiveness will be evaluated once implemented

COMMUNICATION

1. Investigation results will be shared with employees as appropriate
2. Lessons learned will be incorporated into training
3. Policies and procedures will be updated as needed
4. Statistical analysis of incidents will be performed to identify trends

RECORD KEEPING

Records will be maintained for:

1. All incident reports
2. Investigation reports
3. Corrective action plans
4. Training related to incident prevention
5. Regulatory correspondence
6. WSIB claims and correspondence

Records will be kept for a minimum of 5 years or as required by legislation.

REVIEW

This policy will be reviewed annually and updated as needed to ensure effectiveness and compliance with legislation.



7. DISCIPLINARY ACTION POLICY

Sl. No.	Prepared by	Approved by	Revision Date	Published date
1.	Health and Safety Department	Mathews, C Director, ESI Safety	New Program	April 28, 2025



DISCIPLINARY ACTION POLICY

PURPOSE

This policy establishes guidelines for administering disciplinary action in response to violations of ESI Safety Inc.'s health and safety policies, procedures, and practices to ensure a safe and healthy workplace for all employees.

SCOPE

This policy applies to all employees, contractors, and temporary workers of ESI Safety Inc.

POLICY STATEMENT

ESI Safety Inc. is committed to maintaining a safe and healthy workplace. Compliance with health and safety policies, procedures, and practices is a condition of employment. Violations will be addressed promptly and consistently through appropriate disciplinary measures.

RESPONSIBILITIES

Management Responsibilities:

- Ensure this policy is communicated to all employees
- Apply disciplinary measures consistently and fairly
- Document all disciplinary actions
- Review and monitor the effectiveness of this policy

Supervisor Responsibilities:

- Monitor employee compliance with health and safety requirements
- Address safety violations promptly
- Recommend appropriate disciplinary action
- Document infractions and corrective actions
- Follow up to ensure compliance after disciplinary action

Employee Responsibilities:

- Understand and comply with all health and safety policies, procedures, and practices
- Report any health and safety concerns or hazards to management
- Cooperate during investigations of safety infractions
- Comply with corrective actions and disciplinary measures

CLASSIFICATION OF INFRACTIONS

Minor Infractions

Examples include but are not limited to:

- Failure to wear required PPE in designated areas
- Housekeeping issues
- Minor procedure violations that do not create serious risk
- Failure to attend scheduled safety training without valid reason

Serious Infractions

Examples include but are not limited to:

- Repeated minor infractions
- Failure to report incidents or injuries
- Operating equipment without proper training or authorization
- Removing guards or safety devices from equipment
- Creating unsafe conditions for others
- Failure to follow lockout/tagout procedures

Severe Infractions

Examples include but are not limited to:

- Willful violation of safety rules that could result in serious injury or death
- Working while impaired by alcohol or drugs
- Dangerous horseplay or fighting
- Theft or destruction of safety equipment
- Falsification of safety records or reports
- Deliberately causing injury to others

DISCIPLINARY PROCEDURE

ESI Safety Inc. will follow a progressive disciplinary approach for most infractions, with exceptions for severe infractions which may result in immediate termination of employment.

Progressive Disciplinary Steps:

1. **Verbal Warning**
 - Discussion of the infraction
 - Explanation of correct procedures
 - Documentation in employee file
 - Valid for 6 months
2. **Written Warning**
 - Formal documentation of the infraction
 - Specific expectations for improvement
 - Consequences of further infractions
 - Employee signature acknowledging receipt

- Valid for 12 months
- 3. **Suspension Without Pay**
 - Temporary removal from workplace
 - Duration based on severity of infraction
 - Return-to-work safety review
 - Final written warning
 - Valid for 18 months
- 4. **Termination of Employment**
 - May occur after progressive steps or immediately for severe infractions
 - Documentation of reasons for termination
 - Exit interview addressing safety concerns

IMMEDIATE TERMINATION

Severe infractions may result in immediate termination of employment without notice. Examples include:

- Willful endangerment of self or others
- Criminal activity in the workplace
- Gross negligence resulting in or having potential to result in serious injury
- Violation of safety rules resulting in critical injury or death

FACTORS CONSIDERED IN DETERMINING DISCIPLINARY ACTION

1. Severity of the infraction
2. Potential or actual consequences of the action
3. Employee's past safety record
4. Previous disciplinary actions
5. Employee's length of service
6. Employee's knowledge and training
7. Consistency with previous disciplinary actions for similar infractions

DOCUMENTATION

All disciplinary actions will be documented including:

1. Date, time, and location of infraction
2. Description of the infraction
3. Policy or procedure violated
4. Disciplinary action taken
5. Plan for improvement
6. Consequences of further infractions
7. Employee acknowledgment
8. Follow-up actions and dates

APPEAL PROCESS

Employees have the right to appeal disciplinary actions through:

1. Written appeal to next level of management within 5 business days
2. Review by Director or designated representative
3. Final decision within 10 business days of appeal

CONFIDENTIALITY

All disciplinary matters will be handled with appropriate confidentiality. Information will be shared only on a need-to-know basis.

REVIEW

This policy will be reviewed annually to ensure effectiveness and compliance with legislation.



8. COMMUNICATION POLICY

Sl. No.	Prepared by	Approved by	Revision Date	Published date
1.	Health and Safety Department	Mathews, C Director, ESI Safety	New Program	April 28, 2025



COMMUNICATION POLICY

PURPOSE

This policy establishes guidelines for effective health and safety communication within ESI Safety Inc. and with external stakeholders to ensure that all relevant information is shared appropriately and in a timely manner.

SCOPE

This policy applies to all employees, contractors, visitors, and clients of ESI Safety Inc.

POLICY STATEMENT

ESI Safety Inc. recognizes that clear, consistent, and open communication is essential for maintaining a safe and healthy workplace. The company is committed to ensuring that all stakeholders have access to the information they need regarding health and safety matters.

INTERNAL COMMUNICATION

Health and Safety Bulletin Board

A health and safety bulletin board will be maintained in a prominent location and will include:

- Health and safety policy statement
- Names and contact information of JHSC members (if applicable)
- JHSC meeting minutes (if applicable)
- Emergency procedures
- First aid providers and locations of first aid kits
- Current inspection reports (if applicable)
- Ministry of Labour, Training and Skills Development orders (if applicable)
- Workplace violence and harassment policy
- Other relevant health and safety information

Health and Safety Meetings

1. **JHSC Meetings** (if applicable)
 - Held at minimum quarterly
 - Minutes posted on health and safety bulletin board
 - Action items tracked to completion
2. **Team Safety Meetings**
 - Held monthly
 - Include safety topics, updates, and toolbox talks
 - Documented with attendance records

Reports and Documentation

1. Inspection Reports

- Shared with management and affected employees
- Posted on health and safety bulletin board
- Action items tracked to completion

2. Incident Reports

- Communicated to management immediately
- Lessons learned shared with all employees

Electronic Communication

1. Email Updates

- Regular safety bulletins
- Alerts regarding new hazards
- Policy and procedure updates

2. Company Intranet

- Repository for policies and procedures
- Access to forms and checklists
- Safety data sheets (SDS)
- Training materials

EXTERNAL COMMUNICATION

Client Communication

1. Pre-Service Communication

- Information about ESI Safety Inc.'s health and safety program
- Request for site-specific hazard information
- Clear definition of roles and responsibilities

2. Ongoing Communication

- Regular updates on services provided
- Prompt notification of identified hazards
- Recommendations for improvement

3. Post-Service Reporting

- Comprehensive reports on findings
- Clear recommendations
- Follow-up procedures

Regulatory Communication

1. Mandatory Reporting

- Critical injuries and fatalities
- Occupational illnesses
- Other reportable incidents

2. Documentation

- All communication with regulatory authorities will be documented
- Records maintained according to legal requirements

Contractor Communication

1. Pre-Work

- Health and safety expectations
- Site-specific hazards
- Emergency procedures

2. During Work

- Regular safety meetings
- Hazard reporting mechanism
- Incident reporting requirements

EMERGENCY COMMUNICATION

1. Emergency Contact List

- Maintained and updated regularly
- Posted in prominent locations
- Included in employee orientation materials

2. Emergency Notification System

- Established procedure for notifying all employees
- Regular testing of notification system
- Backup communication methods

3. Media Communication

- Only authorized personnel may speak to media
- Prepared statements for various scenarios
- Media training for designated spokespersons

COMMUNICATION METHODS

ESI Safety Inc. will use multiple communication methods to ensure information reaches all stakeholders:

- Face-to-face meetings
- Email and electronic messaging
- Phone and video conferencing
- Written documentation
- Signage and visual aids
- Training sessions
- Company intranet and shared drives

CONFIDENTIALITY

Certain health and safety information may be confidential, including:

- Personal health information
- Specific details of harassment investigations
- Proprietary client information

Such information will be shared only on a need-to-know basis and in accordance with privacy legislation.

LANGUAGE AND ACCESSIBILITY

1. Communication will be provided in clear, understandable language
2. Alternative formats will be provided when necessary
3. Translation services will be used when required
4. Accommodation will be made for employees with disabilities

FEEDBACK MECHANISM

ESI Safety Inc. encourages feedback on health and safety matters through:

1. Direct communication with supervisors
2. JHSC representatives (if applicable)
3. Anonymous suggestion box
4. Regular safety surveys
5. Open-door policy with management

TRAINING

Employees will receive training on:

1. Communication protocols
2. Reporting procedures
3. Documentation requirements
4. Emergency communication

REVIEW

This policy will be reviewed annually to ensure effectiveness and compliance with legislation.

9. WORK FROM HOME POLICY

Sl. No.	Prepared by	Approved by	Revision Date	Published date
1.	Health and Safety Department	Mathews, C Director, ESI Safety	New Program	April 28, 2025



WORK FROM HOME POLICY

PURPOSE

This policy establishes guidelines for employees working from home to ensure their health, safety, and productivity while maintaining compliance with the Ontario Occupational Health and Safety Act.

SCOPE

This policy applies to all ESI Safety Inc. employees who work from home on a regular, occasional, or temporary basis.

POLICY STATEMENT

ESI Safety Inc. recognizes that certain job functions can be performed effectively from home and is committed to providing a safe work environment regardless of location. The company extends its health and safety responsibilities to home offices and expects employees to maintain safe work practices while working remotely.

ELIGIBILITY

Eligibility for work from home arrangements is determined based on:

1. Job responsibilities and the nature of work
2. Operational requirements
3. Employee performance and work habits
4. Suitability of the home workspace
5. Equipment and technology requirements
6. Security and confidentiality considerations

APPROVAL PROCESS

To establish a work from home arrangement:

1. Employee submits Work from Home Request Form
2. Supervisor evaluates request based on eligibility criteria
3. Equipment needs are determined
4. Work schedule and communication protocols are established
5. Work from home agreement is signed

HOME OFFICE REQUIREMENTS

Workspace Setup

Employees must ensure their home workspace:

1. Has adequate space for work equipment
2. Is separate from high-traffic areas when possible
3. Has proper lighting, ventilation, and temperature control
4. Has a proper desk and ergonomic chair
5. Has sufficient electrical outlets and internet connectivity
6. Is free from tripping hazards and other safety concerns

Ergonomic Considerations

Employees must:

1. Use an adjustable chair with proper back support
2. Position monitor at eye level and arm's length
3. Keep wrists straight when typing
4. Have adequate leg room under desk
5. Take regular breaks to stretch and move
6. Report any discomfort related to

Ergonomic Considerations (continued)

6. Report any discomfort related to workstation setup
7. Complete ergonomic self-assessment checklist
8. Make adjustments as recommended

SAFETY ASSESSMENT

Prior to beginning a work from home arrangement:

1. Employee completes Home Office Safety Checklist
2. Supervisor reviews checklist and provides feedback
3. Remediation of identified hazards is completed
4. Follow-up assessment is conducted as needed

The safety assessment will address:

1. Fire safety (smoke detectors, fire extinguisher, evacuation route)
2. Electrical safety (proper wiring, surge protection, outlet capacity)
3. Trip and fall hazards

4. Ergonomic considerations
5. Emergency procedures
6. First aid supplies

EQUIPMENT AND SUPPLIES

Company-Provided Equipment

ESI Safety Inc. may provide:

1. Computer or laptop
2. Phone or softphone application
3. Necessary software and applications
4. Ergonomic accessories as needed
5. Office supplies

Employee Responsibilities for Equipment

Employees must:

1. Maintain company equipment in good condition
2. Report any damage or malfunction immediately
3. Use equipment for business purposes only
4. Follow IT security protocols
5. Return all company property upon termination of employment or work from home arrangement

WORK HOURS AND AVAILABILITY

1. Work hours must be clearly defined and agreed upon
2. Employees must be available during core business hours
3. Regular check-ins with supervisor are required
4. Time tracking procedures must be followed
5. Overtime must be approved in advance

COMMUNICATION REQUIREMENTS

Employees working from home must:

1. Be available by phone and email during agreed work hours
2. Respond to messages in a timely manner

3. Attend virtual meetings as required
4. Provide regular progress updates
5. Notify supervisor of any schedule changes
6. Maintain communication with team members

INCIDENT REPORTING

Work-related injuries or illnesses that occur while working from home must be reported immediately following standard incident reporting procedures. Employees must:

1. Seek medical attention if needed
2. Notify supervisor as soon as possible
3. Complete incident report form within 24 hours
4. Cooperate with any investigation
5. Implement corrective actions as directed

HEALTH AND WELLNESS

ESI Safety Inc. encourages employees working from home to:

1. Take regular breaks
2. Maintain proper posture
3. Stay physically active
4. Set boundaries between work and personal life
5. Reach out if experiencing stress or isolation

SECURITY AND CONFIDENTIALITY

Employees working from home must:

1. Secure confidential information and documents
2. Use company VPN when accessing network resources
3. Lock computer when not in use
4. Ensure family members cannot access work materials
5. Report security breaches immediately
6. Follow all company data protection policies
7. Dispose of confidential documents securely

COSTS AND EXPENSES

ESI Safety Inc. may:

1. Provide necessary equipment for job functions
2. Reimburse approved work-related expenses
3. Not cover home utility costs unless specifically agreed upon
4. Not cover costs for home office furniture unless specifically approved
5. Require receipts for all reimbursable expenses

TERMINATION OF ARRANGEMENT

Work from home arrangements may be terminated:

1. At the request of the employee
2. Due to changes in business needs
3. Due to performance concerns
4. Due to safety concerns
5. Due to security breaches

REVIEW

This policy will be reviewed annually and updated as needed to reflect changing conditions and best practices.



10. WORKING ALONE POLICY

Sl. No.	Prepared by	Approved by	Revision Date	Published date
1.	Health and Safety Department	Mathews, C Director, ESI Safety	New Program	April 28, 2025



WORKING ALONE POLICY

PURPOSE

This policy establishes procedures to protect the health and safety of ESI Safety Inc. employees who work alone or in isolation, in accordance with the Ontario Occupational Health and Safety Act.

SCOPE

This policy applies to all ESI Safety Inc. employees who may work alone while conducting business activities, including but not limited to site inspections, consultations, and administrative work outside normal business hours.

DEFINITIONS

Working Alone: Working in circumstances where assistance is not readily available in the event of injury, illness, or emergency.

High-Risk Activities: Tasks that have an increased potential for injury or harm, including working at heights, working with hazardous substances, working in confined spaces, working with high-voltage electricity, and working in remote locations.

POLICY STATEMENT

ESI Safety Inc. is committed to ensuring the safety of employees who work alone by identifying hazards, implementing controls, establishing communication protocols, and providing necessary training and resources.

RISK ASSESSMENT

Before employees work alone, a risk assessment must be conducted to identify:

1. Potential hazards associated with the work and location
2. Likelihood and potential severity of incidents
3. Control measures required
4. Communication requirements
5. Emergency response procedures

The risk assessment will be documented and reviewed:

- Before initial assignment of lone work
- When conditions change
- Following incidents or near misses
- Annually at minimum

PROHIBITED ACTIVITIES

The following activities must NEVER be performed alone:

1. Work in confined spaces
2. Work involving lockout/tagout procedures
3. Work at heights requiring fall protection
4. Work with highly hazardous chemicals
5. Work with high-voltage electrical systems
6. Other activities identified as high-risk through risk assessment

CONTROL MEASURES

Based on risk assessment, appropriate control measures will be implemented:

Administrative Controls

1. Check-in/check-out procedures
2. Scheduled communication intervals
3. Buddy system when possible
4. Time limitations on high-risk activities
5. Journey management plans
6. Work scheduling during lower-risk hours

Engineering Controls

1. Alarm systems
2. Monitoring devices
3. Automatic emergency notification systems
4. GPS tracking devices
5. Panic buttons or emergency alerting devices

Personal Protective Equipment

1. Appropriate PPE for the task
2. Personal first aid kits
3. Communication devices
4. Personal safety alarms

COMMUNICATION PROTOCOLS

Check-in Procedures

Employees working alone must:

1. Inform designated contact person before beginning work
2. Check in at predetermined intervals
3. Notify contact person of location changes
4. Confirm completion of work and safe departure
5. Follow escalation procedures if check-ins are missed

Communication Devices

Employees working alone must have reliable means of communication:

1. Fully charged cell phone

EMERGENCY RESPONSE

Employees working alone must:

1. Have access to first aid supplies
2. Know emergency contact numbers
3. Be familiar with site emergency procedures
4. Have clear directions to their location for emergency responders
5. Carry emergency contact information at all times

Response to Missed Check-ins

If an employee fails to check in:

1. Designated contact attempts to reach employee
2. If no response, contact attempts continued at 5-minute intervals for 15 minutes
3. If still no response, supervisor is notified
4. If necessary, emergency services are contacted
5. Employee's last known location is checked

TRAINING

Employees who work alone will receive training on:

1. Hazard identification and risk assessment
2. Control measures

3. Communication protocols
4. Emergency procedures
5. First aid and CPR (when applicable)
6. Use of safety equipment
7. Incident reporting

SUPERVISION

Supervisors of employees who work alone must:

1. Ensure risk assessments are completed
2. Implement appropriate control measures
3. Verify communication protocols are established
4. Monitor compliance with this policy
5. Respond to concerns raised by employees
6. Regularly review and update procedures

REPORTING

Employees must report:

1. All incidents and near misses
2. Concerns about working alone
3. Changes in conditions that may affect safety
4. Equipment malfunctions or failures
5. Suggestions for improving safety procedures

REVIEW

This policy will be reviewed annually and updated as needed to reflect changing conditions and best practices.

11. OFFICE EQUIPMENT USAGE POLICY

Sl. No.	Prepared by	Approved by	Revision Date	Published date
1.	Health and Safety Department	Mathews, C Director, ESI Safety	New Program	April 28, 2025



OFFICE EQUIPMENT USAGE POLICY

PURPOSE

This policy establishes guidelines for the safe and appropriate use of office equipment at ESI Safety Inc. to prevent injuries, damage to equipment, and ensure efficient operations.

SCOPE

This policy applies to all employees, contractors, and visitors using office equipment on ESI Safety Inc. premises or company-owned equipment used elsewhere.

POLICY STATEMENT

ESI Safety Inc. is committed to providing properly functioning equipment and ensuring that employees have the knowledge to use it safely. All users are responsible for using equipment properly and reporting issues promptly.

GENERAL REQUIREMENTS

User Responsibilities

All equipment users must:

1. Receive proper training before using equipment
2. Follow manufacturer's instructions and safety guidelines
3. Report any damage or malfunction immediately
4. Not attempt repairs unless authorized and qualified
5. Keep equipment clean and well-maintained
6. Use equipment only for its intended purpose
7. Consider ergonomic factors when using equipment

Management Responsibilities

Management must:

1. Provide appropriate equipment for job functions
2. Ensure equipment is properly maintained
3. Provide necessary training for equipment use
4. Address reported equipment issues promptly
5. Conduct regular equipment inspections
6. Remove damaged or malfunctioning equipment from service

7. Keep records of equipment maintenance and repairs

COMPUTER EQUIPMENT

Proper Use

1. Position monitor at eye level, approximately arm's length away
2. Use adjustable chairs with proper back support
3. Keep wrists straight when typing
4. Use wrist rests and footrests as needed
5. Take regular breaks (10 minutes every hour)
6. Practice proper cable management to prevent tripping hazards
7. Maintain good posture while working

Maintenance

1. Keep food and drinks away from computer equipment
2. Clean screens with appropriate cleaning materials only
3. Keep keyboards and mice clean
4. Ensure adequate ventilation around equipment
5. Turn off computers at the end of the day or when not in use for extended periods
6. Install software updates as prompted

PRINTERS, COPIERS, AND SCANNERS

Proper Use

1. Follow operating instructions posted near equipment
2. Clear paper jams according to manufacturer's instructions
3. Wait for equipment to cool before touching internal components
4. Use proper lifting techniques when changing paper or toner
5. Keep loose clothing, jewelry, and hair away from moving parts
6. Ensure equipment is stable and properly positioned

Maintenance

1. Replace toner and ink according to manufacturer's instructions
2. Dispose of used cartridges according to environmental guidelines

3. Report unusual noises, smells, or performance issues
4. Schedule regular professional maintenance
5. Keep areas around equipment clean and unobstructed

ELECTRICAL SAFETY

1. Inspect cords and plugs regularly for damage
2. Do not use damaged electrical equipment
3. Do not overload outlets or power strips
4. Keep liquids away from electrical equipment
5. Unplug equipment before cleaning or maintenance
6. Use only approved power strips with surge protection
7. Keep electrical cords organized and away from walkways
8. Disconnect equipment during electrical storms when possible

PAPER SHREDDERS

1. Read operating instructions before use
2. Keep fingers away from feed opening
3. Do not shred credit cards, CDs, or other hard materials unless specifically designed for that purpose
4. Empty shredder bin when full
5. Turn off and unplug when not in use
6. Keep loose clothing, jewelry, and hair away from the machine
7. Do not exceed recommended sheet capacity

KITCHEN APPLIANCES

1. Keep appliances clean and in good working order
2. Follow manufacturer's instructions
3. Unplug small appliances when not in use
4. Do not leave cooking appliances unattended
5. Know the location of fire extinguishers
6. Report damaged appliances immediately

7. Clean spills promptly to prevent slips and falls

PORTABLE EQUIPMENT

For equipment taken offsite:

1. Transport equipment safely in appropriate cases or containers
2. Secure equipment when in vehicles to prevent movement
3. Do not leave equipment visible in unattended vehicles
4. Protect equipment from extreme temperatures and moisture
5. Return equipment promptly after use
6. Report any damage that occurs during transport or use

TRAINING

All employees will receive training on:

1. Proper use of equipment relevant to their job functions
2. Ergonomic principles
3. Troubleshooting common issues
4. Reporting procedures for equipment problems
5. Emergency procedures related to equipment use

REPORTING EQUIPMENT ISSUES

To report equipment issues:

1. Notify supervisor immediately
2. Tag equipment as "Out of Order" if appropriate
3. Complete Equipment Issue Report Form
4. Follow up if issue is not resolved in a timely manner

CONSEQUENCES OF MISUSE

Deliberate misuse of equipment may result in:

1. Additional training requirements
2. Restricted equipment access
3. Disciplinary action according to company policy
4. Financial responsibility for damages in cases of negligence or willful damage

REVIEW

This policy will be reviewed annually and updated as needed to reflect changing conditions, equipment, and best practices.



12. CLIENT DATA PRIVACY POLICY

Sl. No.	Prepared by	Approved by	Revision Date	Published date
1.	Health and Safety Department	Mathews, C Director, ESI Safety	New Program	April 28, 2025



CLIENT DATA PRIVACY POLICY

PURPOSE

This policy establishes guidelines for handling client data to ensure privacy, confidentiality, and compliance with applicable privacy legislation including the Personal Information Protection and Electronic Documents Act (PIPEDA).

SCOPE

This policy applies to all employees, contractors, and representatives of ESI Safety Inc. who collect, access, use, store, or disclose client information.

DEFINITIONS

Personal Information: Any information about an identifiable individual, including name, address, phone number, email address, identification numbers, financial information, employment information, and medical information.

Client: Any organization or individual that retains the services of ESI Safety Inc.

Data Breach: Unauthorized access, collection, use, disclosure, copying, modification, or disposal of personal information.

POLICY STATEMENT

ESI Safety Inc. is committed to protecting the privacy and confidentiality of client information. The company will collect, use, and disclose personal information only for the purposes for which it was collected, with consent, and as permitted by law.

PRINCIPLES

ESI Safety Inc. adheres to the following privacy principles:

1. Accountability

- The Director is designated as the Privacy Officer
- All employees are responsible for compliance with this policy
- Third-party service providers must provide comparable privacy protection

2. Identifying Purposes

- The purpose for collecting personal information will be identified before or at the time of collection
- New purposes require new consent

3. Consent

- Informed consent will be obtained for the collection, use, and disclosure of personal information
- Consent can be express or implied, but must be appropriate to the sensitivity of the information
- Clients may withdraw consent at any time, subject to legal or contractual restrictions

4. Limiting Collection

- Only information necessary for identified purposes will be collected
- Information will be collected by fair and lawful means

5. Limiting Use, Disclosure, and Retention

- Information will be used and disclosed only for the purposes for which it was collected
- Information will be retained only as long as necessary for the fulfillment of those purposes
- Information that is no longer required will be securely destroyed

6. Accuracy

- Information will be as accurate, complete, and up-to-date as necessary for the purposes for which it is used
- Clients may request corrections to their information

7. Safeguards

- Security safeguards appropriate to the sensitivity of the information will be implemented
- All employees will receive privacy training
- Access to information will be restricted to those who need it for legitimate business purposes

8. Openness

- Information about our privacy policies and practices will be made available to clients
- The Privacy Policy will be posted on our website and provided upon request

9. Individual Access

- Upon request, clients will be informed of the existence, use, and disclosure of their personal information
- Clients will be given access to their information and can challenge its accuracy and completeness

10. Challenging Compliance

- Clients may challenge ESI Safety Inc.'s compliance with these principles

- All complaints will be investigated and appropriate measures taken

DATA COLLECTION AND USE

Information Collected

ESI Safety Inc. may collect:

1. Contact information (names, addresses, phone numbers, email addresses)
2. Business information (industry, size, locations)
3. Safety records and statistics
4. Employee information provided for training or certification purposes
5. Site conditions and hazards
6. Compliance information

Purpose of Collection

Information is collected for:

1. Providing contracted services
2. Communicating with clients
3. Meeting regulatory requirements
4. Improving services
5. Billing and accounting purposes

SAFEGUARDING INFORMATION

Physical Safeguards

1. Client files stored in locked cabinets
2. Access to office restricted to authorized personnel
3. Clean desk policy
4. Visitor sign-in procedures
5. Secure disposal of physical documents (shredding)

Electronic Safeguards

1. Password protection on all devices
2. Encryption of sensitive data

3. Firewalls and antivirus software
4. Regular security updates
5. Access controls based on job responsibilities
6. Regular backups
7. Secure remote access procedures

Administrative Safeguards

1. Employee confidentiality agreements
2. Regular privacy training
3. Limited access based on need-to-know
4. Regular audits of privacy practices
5. Vendor management procedures

MOBILE AND REMOTE WORK

When working remotely or on client sites:

1. Physical documents containing client information must be secured at all times
2. Laptops and mobile devices must be password-protected and encrypted
3. Client information should not be downloaded to personal devices
4. Public Wi-Fi should be avoided when accessing client information
5. Privacy screens should be used in public places

DATA BREACH RESPONSE

In the event of a data breach:

1. The Privacy Officer must be notified immediately
2. The breach will be contained to prevent further unauthorized access
3. The breach will be evaluated to determine what information was affected
4. Affected clients will be notified as required by law
5. The breach will be reported to the Privacy Commissioner if required
6. Corrective measures will be implemented to prevent recurrence

CLIENT RIGHTS

Clients have the right to:

1. Know what personal information ESI Safety Inc. holds about them
2. Access their personal information
3. Request corrections to inaccurate information
4. Withdraw consent for certain uses of their information
5. File a complaint about privacy practices

RETENTION AND DESTRUCTION

1. Client information will be retained only as long as necessary for the purposes for which it was collected
2. Retention periods will comply with legal and regulatory requirements
3. Records will be securely destroyed when no longer needed
4. A records retention schedule will be maintained
5. Destruction of records will be documented

STAFF TRAINING

All staff will receive training on:

1. Privacy legislation and principles
2. This privacy policy
3. Proper handling of client information
4. Recognizing and responding to privacy breaches
5. Safeguarding information in various work environments

REVIEW

This policy will be reviewed annually and updated as needed to ensure effectiveness and compliance with legislation.

13. MONEY HANDLING POLICY

Sl. No.	Prepared by	Approved by	Revision Date	Published date
1.	Health and Safety Department	Mathews, C Director, ESI Safety	New Program	April 28, 2025



MONEY HANDLING POLICY

PURPOSE

This policy establishes procedures for the safe and secure handling of money and financial transactions at ESI Safety Inc. to prevent loss, theft, fraud, and ensure accurate financial record-keeping.

SCOPE

This policy applies to all employees who handle cash, cheques, credit cards, or electronic payments, process financial transactions, or have access to company financial accounts.

POLICY STATEMENT

ESI Safety Inc. is committed to ensuring that all financial transactions are conducted with integrity, accuracy, and appropriate security measures. All money handling activities must follow established procedures to protect both employees and company assets.

RESPONSIBILITIES

Management Responsibilities:

- Establish and maintain money handling procedures
- Provide appropriate training to employees
- Ensure proper security measures are in place
- Conduct regular audits of financial transactions
- Investigate discrepancies promptly
- Restrict access to financial systems based on job requirements

Employee Responsibilities:

- Follow established money handling procedures
- Report discrepancies immediately
- Maintain confidentiality of financial information
- Participate in required training
- Never share access credentials for financial systems
- Adhere to dual control procedures when required

CASH HANDLING

Receiving Cash

1. Count cash in a secure, non-public area

2. Verify amount with payer and provide receipt
3. Record transaction immediately
4. Store cash in secure location until deposit
5. Never leave cash unattended

Cash Storage

1. Use locked cash boxes, drawers, or safes
2. Limit access to authorized personnel only
3. Change safe combinations periodically
4. Do not share keys or combinations
5. Maintain minimal cash on premises

Cash Deposits

1. Prepare deposits daily when possible
2. Use tamper-evident deposit bags
3. Record all deposit information
4. Vary deposit times and routes when possible
5. Two employees should verify deposit contents
6. Obtain receipt for all deposits

CHEQUE HANDLING

1. Verify cheque payee, date, amount, and signature
2. Endorse cheques immediately with "For Deposit Only"
3. Keep checks in secure location until deposit
4. Record all check payments in appropriate system
5. Report any suspicious checks to management
6. Follow up on returned checks promptly

CREDIT CARD TRANSACTIONS

1. Process credit card transactions only through approved systems
2. Never write down or retain complete credit card numbers
3. Ensure credit card information is transmitted securely

4. Provide receipts for all transactions
5. Reconcile credit card batches daily
6. Report suspected fraudulent transactions immediately

ELECTRONIC PAYMENTS

1. Verify electronic payment information before processing
2. Confirm receipt of electronic payments
3. Document all electronic transactions
4. Use secure methods for transmitting payment instructions
5. Reconcile electronic payments daily

INVOICING AND ACCOUNTS RECEIVABLE

1. Issue invoices promptly and accurately
2. Maintain detailed records of all invoices
3. Follow up on overdue accounts according to schedule
4. Document all communication regarding payments
5. Reconcile accounts receivable regularly

ACCOUNTS PAYABLE

1. Verify all invoices before payment
2. Ensure proper authorization for all payments
3. Maintain separation of duties (requestor, approver, processor)
4. Document all payments with appropriate supporting materials
5. Conduct regular reconciliation of accounts payable

PETTY CASH

1. Maintain petty cash in locked box with limited access
2. Require receipts for all petty cash disbursements
3. Maintain petty cash log with running balance
4. Reconcile petty cash regularly

5. Replenish petty cash through formal request process

BUSINESS EXPENSES AND REIMBURSEMENTS

1. Require original receipts for all expense reimbursements
2. Submit expense reports within established timeframe
3. Obtain appropriate approvals for all expenses
4. Follow established limits for various expense categories
5. Provide detailed information for all expenses

SECURITY MEASURES

1. Limit access to financial systems based on job requirements
2. Require strong passwords that are changed regularly
3. Use dual control for high-value transactions
4. Conduct background checks for employees in financial positions
5. Maintain surveillance in areas where money is handled
6. Update security protocols regularly

RECORD KEEPING

1. Maintain detailed records of all financial transactions
2. Follow record retention schedule for financial documents
3. Secure financial records in locked cabinets or password-protected systems
4. Back up electronic financial records regularly
5. Maintain audit trail for all transactions

REPORTING DISCREPANCIES

1. Report any discrepancies immediately to supervisor
2. Document all details related to the discrepancy
3. Preserve any evidence related to the discrepancy
4. Cooperate fully with any investigation
5. Do not discuss discrepancies with unauthorized personnel

FRAUD PREVENTION

1. Verify identity before processing financial transactions

2. Be alert for warning signs of fraud
3. Report suspicious activity immediately
4. Follow established verification procedures
5. Never circumvent security measures for convenience

TRAINING

All employees who handle money will receive training on:

1. This policy and related procedures
2. Identifying counterfeit currency
3. Fraud detection and prevention
4. Security protocols
5. Emergency procedures related to theft or robbery

AUDIT AND COMPLIANCE

1. Regular audits of financial transactions will be conducted
2. Surprise cash counts may be performed
3. Discrepancies will be investigated promptly
4. Employees must cooperate with all audit activities
5. Procedures will be updated based on audit findings

CONSEQUENCES OF POLICY VIOLATIONS

Violations of this policy may result in:

1. Additional training
2. Removal from money handling responsibilities
3. Disciplinary action up to and including termination
4. Legal action if appropriate

REVIEW

This policy will be reviewed annually and updated as needed to ensure effectiveness and compliance with financial regulations.

14. CONFLICT OF INTEREST POLICY

Sl. No.	Prepared by	Approved by	Revision Date	Published date
1.	Health and Safety Department	Mathews, C Director, ESI Safety	New Program	April 28, 2025



CONFLICT OF INTEREST POLICY

PURPOSE

This policy establishes guidelines for identifying, disclosing, and managing conflicts of interest at ESI Safety Inc. to maintain integrity, objectivity, and professional standards in all business activities.

SCOPE

This policy applies to all employees, contractors, management, and representatives of ESI Safety Inc.

DEFINITIONS

Conflict of Interest: A situation where personal interests, relationships, or activities could improperly influence or appear to influence professional judgments or actions related to ESI Safety Inc.'s business.

Personal Interest: Any interest, relationship, association, or activity that affects or could appear to affect an individual's objectivity in making decisions related to ESI Safety Inc.

Financial Interest: Ownership or investment in a company, organization, or entity that does business with ESI Safety Inc. or competes with ESI Safety Inc.

Related Party: Family members, close friends, business partners, or organizations in which the employee has a significant interest.

POLICY STATEMENT

ESI Safety Inc. is committed to conducting business with integrity and maintaining the trust of clients, employees, and the public. Employees must avoid situations where personal interests conflict, or appear to conflict, with the company's interests. When potential conflicts arise, they must be promptly disclosed and appropriately managed.

TYPES OF CONFLICTS

Financial Conflicts

1. Ownership or significant investment in a competitor, supplier, or client
2. Receiving personal financial benefit from company transactions
3. Making business decisions based on personal financial interests
4. Accepting substantial gifts or entertainment from clients or suppliers

Relationship Conflicts

1. Supervising or making employment decisions about a family member or close friend
2. Having a personal relationship with a client, competitor, or supplier
3. Using relationships to influence business decisions

4. Providing preferential treatment based on personal relationships

Outside Activities

1. Employment with a competitor, supplier, or client
2. Serving on a board that conflicts with company interests
3. Using company time or resources for outside business activities
4. Providing consulting services to competitors

Information Conflicts

1. Using confidential company information for personal gain
2. Sharing client information with unauthorized parties
3. Using proprietary information in outside activities
4. Withholding information that should be disclosed to clients or management

DISCLOSURE REQUIREMENTS

All employees must:

1. Disclose actual or potential conflicts of interest immediately upon recognition
2. Complete annual Conflict of Interest Disclosure Form
3. Update disclosure if circumstances change
4. Seek guidance when uncertain about potential conflicts

DISCLOSURE PROCEDURE

1. Identify potential conflicts of interest
2. Complete Conflict of Interest Disclosure Form
3. Submit form to immediate supervisor and Director
4. Provide additional information as requested
5. Await management decision on appropriate action
6. Follow prescribed management plan for the conflict

MANAGEMENT OF CONFLICTS

When a conflict is disclosed, management will:

1. Review the disclosed conflict
2. Determine if a conflict exists

3. Assess the severity and implications of the conflict
4. Develop a management plan which may include:
 - Removal of the employee from certain duties
 - Reassignment of specific responsibilities
 - Enhanced oversight of the employee's activities
 - Divestment of financial interests
 - Declining certain client engagements
 - Implementation of information barriers
 - Disclosure to affected clients
 - Recusal from specific decisions
5. Document the management plan
6. Monitor compliance with the management plan

SPECIFIC CONFLICT SITUATIONS

Client Relations

1. Employees must disclose personal relationships with client representatives
2. Client assignments may be reassigned if conflicts exist
3. Employees must not accept substantial gifts from clients
4. Client confidentiality must be maintained even when conflicts exist

Procurement and Vendor Relations

1. Employees involved in procurement must disclose relationships with vendors
2. Competitive bidding processes must be followed
3. Employees must recuse themselves from decisions involving related parties
4. Gifts from vendors must be disclosed and may be prohibited

Outside Employment and Activities

1. Outside employment requires prior approval
2. Outside activities must not interfere with job performance
3. Company resources must not be used for outside activities
4. Competing employment is generally prohibited

Financial Interests

1. Significant financial interests in competitors, clients, or suppliers must be disclosed
2. Financial interests may need to be divested if conflicts cannot be managed
3. Investment decisions should not be based on confidential company information
4. Employees must not personally benefit from company transactions

GIFTS AND ENTERTAINMENT

1. Nominal gifts (under \$50 value) may be accepted if not intended to influence decisions
2. Gifts exceeding \$50 value must be disclosed and may need to be returned
3. Frequent gifts from the same source are discouraged
4. Entertainment must be reasonable and appropriate for business purposes
5. All gifts and entertainment must be documented

CONFIDENTIALITY

1. Disclosed conflict information will be kept confidential
2. Information will be shared only with those who need to know
3. Documents will be stored securely
4. Privacy will be respected throughout the process

CONSEQUENCES OF POLICY VIOLATIONS

Violations of this policy may result in:

1. Administrative action
2. Removal from certain duties or projects
3. Disciplinary action up to and including termination
4. Legal action if appropriate

TRAINING AND AWARENESS

All employees will receive training on:

1. Identifying potential conflicts of interest
2. Disclosure procedures
3. Examples of common conflict situations
4. Ethical decision-making

REVIEW

This policy will be reviewed annually and updated as needed to ensure effectiveness and compliance with legislation.



15. CLIENT MANAGEMENT POLICY

Sl. No.	Prepared by	Approved by	Revision Date	Published date
1.	Health and Safety Department	Mathews, C Director, ESI Safety	New Program	April 28, 2025



CLIENT MANAGEMENT POLICY

PURPOSE

This policy establishes guidelines for managing client relationships at ESI Safety Inc. to ensure professional, consistent, and high-quality service while maintaining the safety of employees during client interactions.

SCOPE

This policy applies to all employees who interact with clients, including consultants, administrative staff, and management.

POLICY STATEMENT

ESI Safety Inc. is committed to providing exceptional service while maintaining professional boundaries and ensuring employee safety during all client interactions. The company will establish clear expectations with clients and deliver services in a manner that upholds our professional standards and safety protocols.

CLIENT ONBOARDING

Initial Contact

1. Respond to inquiries within one business day
2. Collect preliminary information about client needs
3. Schedule initial consultation
4. Provide information about ESI Safety Inc. services
5. Document all communication

Client Assessment

1. Conduct needs assessment
2. Evaluate potential hazards at client sites
3. Determine appropriate service level
4. Identify potential challenges or concerns
5. Assess client readiness for health and safety improvements

Service Agreement

1. Develop clear scope of work
2. Define deliverables and timelines
3. Establish fee structure and payment terms
4. Clarify roles and responsibilities

5. Address confidentiality requirements
6. Include safety protocols for on-site work
7. Define communication expectations
8. Outline termination conditions

Client Orientation

1. Introduce key team members
2. Explain service delivery process
3. Provide emergency contact information
4. Review communication protocols
5. Address client questions and concerns

SERVICE DELIVERY

Pre-Service Planning

1. Conduct internal planning meeting
2. Review client history and requirements
3. Prepare necessary equipment and materials
4. Confirm appointments with client
5. Review site-specific safety requirements
6. Plan travel logistics

On-Site Safety

1. Follow visitor sign-in procedures at client sites
2. Adhere to client's safety protocols
3. Wear appropriate PPE
4. Conduct pre-work safety assessment
5. Identify emergency exits and procedures
6. Report hazardous conditions to appropriate personnel
7. Do not perform work that exceeds capability or authority

Professional Conduct

1. Maintain professional appearance and demeanor

2. Respect client property and confidentiality
3. Communicate clearly and respectfully
4. Stay within scope of services
5. Document all observations and recommendations
6. Follow through on commitments
7. Represent ESI Safety Inc. in a positive manner

Documentation

Service Agreement

1. Prepare detailed proposal based on assessment
2. Clearly outline scope of services
3. Specify deliverables and timelines
4. Define roles and responsibilities
5. Include fee structure and payment terms
6. Address confidentiality requirements
7. Obtain signed agreement before commencing work

CLIENT RELATIONSHIP MANAGEMENT

Communication Standards

1. Maintain regular communication with all clients
2. Respond to client inquiries within 24 hours
3. Use professional language and terminology
4. Document all significant communications
5. Provide regular status updates on ongoing projects
6. Communicate delays or changes promptly

Meeting Protocol

1. Prepare agenda for all client meetings
2. Distribute relevant materials in advance
3. Start and end meetings on time
4. Document meeting discussions and decisions
5. Follow up with meeting minutes and action items
6. Schedule follow-up meetings as needed

Information Management

1. Maintain secure client files
2. Keep records of all client interactions

3. Document advice provided and decisions made
4. Store client information according to privacy policy
5. Maintain version control of all documents
6. Back up client information regularly

SERVICE DELIVERY

Quality Standards

1. Apply consistent methodology across all clients
2. Follow industry best practices and standards
3. Use evidence-based approaches
4. Provide objective and unbiased assessments
5. Deliver services within agreed timeframes
6. Conduct internal quality reviews of deliverables

Site Visits

1. Schedule visits in advance when possible
2. Confirm appointment 24 hours before visit
3. Arrive on time and properly equipped
4. Follow client site safety protocols
5. Conduct thorough assessments
6. Provide immediate feedback on critical issues
7. Follow up with written reports within agreed timeframe

Report Standards

1. Use standardized templates for consistency
2. Include executive summary
3. Provide clear findings and recommendations
4. Back recommendations with regulatory requirements or best practices
5. Use objective language
6. Include supporting documentation
7. Submit reports within agreed timeframe
8. Maintain electronic copies of all reports

ETHICAL CONSIDERATIONS

Professional Integrity

1. Provide honest assessments even when findings are challenging
2. Disclose limitations in expertise or service capability
3. Recommend additional services only when necessary

4. Maintain professional credentials and knowledge
5. Follow professional code of ethics

Conflicts of Interest

1. Disclose any potential conflicts of interest
2. Avoid providing services where objectivity could be compromised
3. Refer clients to other providers when appropriate
4. Follow conflict of interest policy
5. Document conflict management decisions

Confidentiality

1. Protect confidential client information
2. Use client information only for intended purposes
3. Obtain permission before sharing client information
4. Secure client data according to privacy policy
5. Return or securely destroy client information when no longer needed

CHALLENGING SITUATIONS

Client Disagreements

1. Listen to client concerns respectfully
2. Document areas of disagreement
3. Provide additional information or clarification
4. Seek resolution based on objective criteria
5. Escalate to management when necessary
6. Document resolution process

Regulatory Issues

1. Clearly communicate regulatory requirements
2. Document advice regarding compliance issues
3. Maintain professional stance on regulatory matters
4. Report imminent dangers as required by law
5. Handle mandatory reporting with sensitivity

Scope Changes

1. Identify scope changes early
2. Communicate impact on timeline and deliverables
3. Document scope changes in writing
4. Obtain client approval for revised scope
5. Update service agreement as necessary

CLIENT FEEDBACK AND EVALUATION

Feedback Collection

1. Request feedback after project completion
2. Conduct annual client satisfaction surveys
3. Maintain open channels for ongoing feedback
4. Document and analyze feedback
5. Share feedback with relevant team members

Performance Metrics

1. Track key performance indicators
2. Monitor timeliness of deliverables
3. Evaluate quality of service delivery
4. Measure client satisfaction
5. Review client retention rates

Continuous Improvement

1. Identify areas for improvement based on feedback
2. Develop action plans to address deficiencies
3. Implement process improvements
4. Monitor effectiveness of changes
5. Share lessons learned across organization

TERMINATION OF SERVICES

Planned Completion

1. Provide summary of services delivered
2. Document recommendations for ongoing activities
3. Return client materials and information
4. Conduct exit interview or final meeting
5. Seek feedback on service quality

Early Termination

1. Document reasons for early termination
2. Complete all contractual obligations
3. Provide transition assistance if appropriate
4. Return client materials and information
5. Conduct lessons learned review internally

RESPONSIBILITIES

Employee Responsibilities

1. Adhere to client management procedures
2. Maintain professional demeanor with clients
3. Deliver services according to quality standards
4. Document client interactions
5. Escalate issues when appropriate

Supervisor Responsibilities

1. Oversee client relationships
2. Review and approve client deliverables
3. Address client concerns
4. Monitor service quality
5. Provide guidance on complex client issues

Director Responsibilities

1. Establish client management strategy
2. Review significant client issues
3. Approve exceptions to standard procedures
4. Maintain key client relationships
5. Review client satisfaction data

REVIEW

This policy will be reviewed annually and updated as needed to ensure effectiveness and alignment with company objectives.

16. EMERGENCY RESPONSE PLAN

Sl. No.	Prepared by	Approved by	Revision Date	Published date
1.	Health and Safety Department	Mathews, C Director, ESI Safety	New Program	April 28, 2025



EMERGENCY RESPONSE PLAN

PURPOSE

This plan establishes procedures for responding to emergencies that may occur at ESI Safety Inc. premises or during employee activities at client sites to protect employees, clients, visitors, and property from harm.

SCOPE

This plan applies to all employees, contractors, and visitors at ESI Safety Inc. premises and to employees conducting work at client sites.

EMERGENCY RESPONSE TEAM

Team Structure

1. Emergency Coordinator: [Position Title]
2. Floor Wardens: [Position Titles]
3. First Aid Providers: [Names of Certified Personnel]
4. Fire Wardens: [Names of Trained Personnel]
5. Communications Coordinator: [Position Title]

Team Responsibilities

1. Emergency Coordinator: Overall direction of emergency response
2. Floor Wardens: Evacuation coordination
3. First Aid Providers: Medical response
4. Fire Wardens: Fire response and evacuation
5. Communications Coordinator: Internal and external communications

EMERGENCY PROCEDURES

Fire Emergency

1. Person discovering fire:
 - Activate nearest fire alarm
 - Call 911 if safe to do so
 - Alert others in immediate area
 - Attempt to extinguish only if trained and fire is small
 - Evacuate following established routes
2. All personnel:
 - Stop work immediately
 - Shut down hazardous equipment if safe to do so
 - Close doors and windows if time permits

- Evacuate using nearest exit
 - Do not use elevators
 - Assist persons with disabilities
 - Proceed to assembly area
 - Report to Floor Warden for headcount
3. Emergency Coordinator:
- Ensure 911 has been called
 - Coordinate with emergency services
 - Determine if building is clear
 - Provide information to emergency responders
 - Determine when it is safe to re-enter

Medical Emergency

1. Person discovering medical emergency:
- Call 911 for serious injuries/illnesses
 - Contact First Aid Provider
 - Stay with injured person
 - Send someone to meet emergency services
2. First Aid Provider:
- Assess situation and provide appropriate care
 - Determine need for additional resources
 - Complete incident report
3. Emergency Coordinator:
- Ensure appropriate resources are available
 - Notify family members if necessary
 - Coordinate with emergency services
 - Initiate incident investigation

Severe Weather

1. Emergency Coordinator:
- Monitor weather alerts
 - Announce shelter-in-place if necessary
 - Direct personnel to designated shelter areas
2. All personnel:
- Move away from windows
 - Go to interior rooms or designated shelter areas
 - Remain in shelter until all-clear is given
 - Follow directions from Emergency Coordinator

Power Outage

1. All personnel:
- Stay calm and in place initially
 - Secure hazardous materials or processes

- Turn off equipment that could be damaged by power surge
- Use flashlights (no candles or open flames)
- 2. Emergency Coordinator:
 - Determine extent and estimated duration
 - Decide whether to evacuate or continue operations
 - Coordinate with building management
 - Communicate plan to all personnel

Chemical Spill

1. Person discovering spill:
 - Alert others in area
 - Evacuate immediate area if necessary
 - Report spill to supervisor
2. Trained personnel:
 - Assess hazard using SDS
 - Don appropriate PPE
 - Contain spill if safe to do so
 - Clean up according to procedures
 - Dispose of waste properly
3. For large or hazardous spills:
 - Evacuate affected area
 - Call emergency services
 - Provide SDS to responders

Violence or Threat

1. Person experiencing threat:
 - Remove yourself from situation if possible
 - Call 911 if immediate danger
 - Alert supervisor or security
2. All personnel in active threat situation:
 - RUN: Evacuate if possible
 - HIDE: Lock/barricade doors if evacuation not possible
 - FIGHT: As last resort, act aggressively to disrupt attacker
 - Call 911 when safe to do so
3. Emergency Coordinator:
 - Coordinate with emergency services
 - Implement lockdown if necessary
 - Communicate with employees
 - Document all events

EVACUATION PROCEDURES

Evacuation Routes

1. Primary and secondary evacuation routes are posted in each area
2. All personnel must be familiar with routes from their work area
3. Routes should be checked for obstacles regularly

Assembly Areas

1. Primary Assembly Area: [Specify Location]
2. Secondary Assembly Area: [Specify Location]
3. Assembly area should be at least 100 meters from building

Evacuation Process

1. Leave belongings behind
2. Close doors but do not lock
3. Help others if safe to do so
4. Use stairs, not elevators
5. Go directly to assembly area
6. Report to Floor Warden for headcount
7. Remain at assembly area until authorized to leave
8. Do not re-enter building until authorized

Persons Requiring Assistance

1. Buddies assigned to assist persons with disabilities
2. Personal Emergency Evacuation Plans (PEEPs) developed for individuals with disabilities
3. Evacuation chairs located at [Specify Locations]
4. Designated waiting areas in stairwells if immediate evacuation not possible

COMMUNICATION DURING EMERGENCIES

Internal Communication

1. Primary: Public address system
2. Secondary: Phone/text messaging tree
3. Tertiary: Runners if electronic systems unavailable

External Communication

1. Communications Coordinator handles media inquiries
2. Only Director or designee may speak to media
3. Standard statement prepared for common emergencies

4. Employee emergency contact information maintained in secure location

Emergency Contacts

1. Emergency Services: 911
2. Building Management: [Insert Number]
3. Utilities: [Insert Numbers]
4. Poison Control: 1-800-222-1222
5. Director: [Insert Number]
6. Emergency Coordinator: [Insert Number]

CLIENT SITE EMERGENCIES

Preparation

1. Review client emergency procedures upon arrival
2. Identify emergency exits and assembly areas
3. Note location of fire extinguishers and first aid kits
4. Know client emergency contact numbers
5. Establish communication procedure with ESI office

Response

1. Follow client emergency procedures
2. Notify client emergency contact
3. Contact ESI office when safe to do so
4. Document incident according to ESI policy
5. File incident report upon return to office

EMERGENCY EQUIPMENT

Fire Safety Equipment

1. Fire extinguishers located at [Specify Locations]
2. Fire alarm pull stations at all exits
3. Smoke detectors throughout facility
4. Monthly inspection of all equipment

First Aid Equipment

1. First aid kits located at [Specify Locations]
2. AED located at [Specify Location]
3. Emergency eyewash and shower at [Specify Location]
4. Monthly inspection of all equipment

Emergency Power

1. Emergency lighting in all corridors and stairwells
2. Battery backup for critical systems
3. Emergency generator for [Specify Systems]
4. Monthly testing of emergency power systems

TRAINING AND DRILLS

Training Requirements

1. All employees receive emergency response training at orientation
2. Annual refresher training for all employees
3. Specialized training for Emergency Response Team members
4. First aid and CPR training for designated personnel
5. Documentation of all training

Emergency Drills

1. Fire evacuation drill conducted quarterly
2. Severe weather drill conducted annually
3. Medical emergency response drill conducted annually
4. Documentation and evaluation of all drills
5. Corrective actions implemented based on drill evaluations

POST-EMERGENCY PROCEDURES

Assessment and Recovery

1. Assessment of damage or impact
2. Documentation of incident
3. Development of recovery plan
4. Coordination with insurance providers
5. Restoration of normal operations

Incident Investigation

1. Investigation team appointed
2. Documentation of incident facts
3. Root cause analysis
4. Development of preventive measures
5. Implementation of corrective actions
6. Follow-up to verify effectiveness

Debriefing

1. Debriefing session with all involved personnel
2. Review of response effectiveness
3. Identification of improvement opportunities
4. Update of emergency plan as needed
5. Recognition of effective actions

PLAN MAINTENANCE

1. Annual review and update of plan
2. Update after significant incidents
3. Update after facility changes
4. Testing of all emergency systems
5. Verification of emergency contact information
6. Documentation of all reviews and updates

APPENDICES

1. Emergency Response Team contact information
2. Evacuation route maps
3. Assembly area maps
4. Emergency equipment locations
5. Emergency procedures quick reference guides
6. Incident report forms

REVIEW

This plan will be reviewed annually and updated as needed to ensure effectiveness.

17. TRAINING REQUIREMENTS

Sl. No.	Prepared by	Approved by	Revision Date	Published date
1.	Health and Safety Department	Mathews, C Director, ESI Safety	New Program	April 28, 2025



TRAINING REQUIREMENTS

PURPOSE

This policy establishes the minimum health and safety training requirements for all employees of ESI Safety Inc. to ensure regulatory compliance and maintain a safe working environment.

SCOPE

This policy applies to all employees, contractors, and temporary workers of ESI Safety Inc.

POLICY STATEMENT

ESI Safety Inc. is committed to providing comprehensive health and safety training to all employees to ensure they have the knowledge and skills necessary to perform their duties safely and in compliance with applicable regulations. Training will be provided at the time of hiring, when job duties change, when new hazards are introduced, and on a regular basis to maintain knowledge and skills.

REGULATORY REQUIREMENTS

ESI Safety Inc. will comply with all training requirements specified in:

1. Ontario Occupational Health and Safety Act (OHSA)
2. Workplace Hazardous Materials Information System (WHMIS) Regulations
3. First Aid Requirements Regulation (Reg. 1101)
4. Working at Heights standards
5. Other applicable regulations based on specific job functions

GENERAL TRAINING REQUIREMENTS

Orientation Training

All new employees must receive orientation training that includes:

1. Company health and safety policy
2. Workplace violence and harassment policy
3. Emergency procedures
4. Incident reporting procedures
5. Employee rights and responsibilities
6. Hazard reporting procedures
7. Joint Health and Safety Committee role
8. First aid facilities and personnel
9. Personal protective equipment requirements
10. Job-specific safety procedures

Mandatory Training for All Employees

1. WHMIS 2015
2. Workplace Violence and Harassment Prevention
3. Emergency Response Procedures
4. Office Ergonomics
5. Basic Fire Safety
6. Incident Reporting

Management and Supervisor Training

1. Due Diligence for Supervisors
2. Incident Investigation
3. Workplace Inspections
4. Health and Safety Leadership
5. Return to Work Program Management
6. Recognition and Control of Workplace Hazards

JOB-SPECIFIC TRAINING REQUIREMENTS

Field Consultants

1. Working at Heights
2. Confined Space Awareness
3. Job Hazard Analysis
4. Industrial Hygiene Sampling (if applicable)
5. Personal Protective Equipment Selection and Use
6. Construction Safety Awareness
7. Industrial Safety Awareness
8. Defensive Driving
9. First Aid and CPR

Office Staff

1. Office Safety
2. Ergonomics
3. Manual Material Handling
4. First Aid and CPR (designated staff)

Joint Health and Safety Committee Members (if applicable)

1. Certified Member Training (at least one worker and one management representative)
2. Workplace Inspection Training
3. Incident Investigation Training
4. Hazard Recognition, Assessment and Control

TRAINING DELIVERY METHODS

ESI Safety Inc. will utilize various training methods including:

1. In-person classroom training
2. Online e-learning modules
3. On-the-job training
4. External courses and workshops
5. Toolbox talks and safety meetings
6. Self-directed learning with verification

TRAINING DOCUMENTATION

The following documentation will be maintained for all training:

1. Training content and materials
2. Date, duration, and location of training
3. Name and qualifications of trainer
4. Names and signatures of attendees
5. Test results or competency assessments
6. Certificates of completion
7. Expiry dates for certifications

TRAINING FREQUENCY

Initial Training

1. Orientation training before beginning work
2. Job-specific training before performing tasks independently
3. Mandatory training within first month of employment

Refresher Training

1. WHMIS 2015: Annually
2. Workplace Violence and Harassment: Annually
3. Emergency Procedures: Annually
4. Working at Heights: Every three years
5. First Aid and CPR: Every three years
6. Other certifications: As specified by regulation or certifying body

Additional Training

1. When new equipment is introduced
2. When procedures change
3. When new hazards are identified
4. Following incidents or near misses

5. When performance indicates need for retraining
6. When regulations change

TRAINING EVALUATION

Training effectiveness will be evaluated through:

1. Pre and post-training knowledge assessments
2. On-the-job observation
3. Workplace inspection findings
4. Incident rates and types
5. Employee feedback
6. Supervisor feedback

EXTERNAL TRAINING PROVIDERS

When external training providers are used, they must:

1. Be qualified in the subject matter
2. Provide training that meets regulatory requirements
3. Provide proper documentation of training
4. Use appropriate training methods
5. Evaluate participant knowledge and skills

TRAINING COSTS

1. ESI Safety Inc. will cover costs for all required training
2. Time spent in required training is considered work time
3. Travel costs for off-site training will be reimbursed
4. Optional career development training may be subject to separate policy

RESPONSIBILITIES

Management Responsibilities

1. Ensure training policy is implemented
2. Provide resources for training
3. Ensure training records are maintained
4. Review training effectiveness
5. Address training deficiencies

Supervisor Responsibilities

1. Identify training needs
2. Schedule employees for required training
3. Ensure employees complete training

4. Reinforce training through observation and coaching
5. Provide feedback on training effectiveness

Employee Responsibilities

1. Attend and participate in all required training
2. Apply training in daily work activities
3. Inform supervisor if additional training is needed
4. Maintain personal training certifications
5. Provide feedback on training effectiveness

TRAINING MATRIX

A training matrix will be maintained that identifies:

1. Required training by job position
2. Current status of employee training
3. Upcoming refresher training needs
4. Training priorities
5. Training budget allocation

REVIEW

This policy will be reviewed annually and updated as needed to ensure effectiveness and compliance with legislation.



18. PERSONAL PROTECTIVE EQUIPMENT POLICY

Sl. No.	Prepared by	Approved by	Revision Date	Published date
1.	Health and Safety Department	Mathews, C Director, ESI Safety	New Program	April 28, 2025



PERSONAL PROTECTIVE EQUIPMENT POLICY

PURPOSE

This policy establishes requirements for the selection, use, maintenance, and training related to personal protective equipment (PPE) to protect employees from workplace hazards.

SCOPE

This policy applies to all employees, contractors, and visitors who work at or visit ESI Safety Inc. premises or client sites where hazards exist that require the use of PPE.

POLICY STATEMENT

ESI Safety Inc. is committed to protecting employees from workplace hazards through the hierarchy of controls, with PPE being used when engineering and administrative controls cannot adequately control the hazard. Appropriate PPE will be provided, and employees will be trained in its proper use and maintenance.

HAZARD ASSESSMENT

Assessment Requirements

1. Formal hazard assessments will be conducted for all work areas and tasks
2. Assessments will identify hazards that require PPE
3. Assessments will specify type of PPE required
4. Assessments will be documented and reviewed annually
5. Assessments will be updated when processes change

Assessment Responsibility

1. Initial assessments conducted by qualified safety personnel
2. Supervisors responsible for ongoing assessment
3. Employees must report new hazards immediately
4. JHSC will review assessment findings
5. Management will approve assessment recommendations

PPE SELECTION

General Requirements

1. All PPE must meet CSA or equivalent standards
2. PPE must be selected based on specific hazards
3. PPE must be appropriate for the task and environment
4. PPE must properly fit the employee

5. PPE must be compatible with other required PPE

Specific PPE Standards

1. Eye and Face Protection: CSA Z94.3
2. Head Protection: CSA Z94.1
3. Foot Protection: CSA Z195
4. Hearing Protection: CSA Z94.2
5. Respiratory Protection: CSA Z94.4
6. High-Visibility Apparel: CSA Z96
7. Fall Protection: CSA Z259

REQUIRED PPE BY JOB FUNCTION

Field Consultants

1. Hard hat (construction and industrial sites)
2. Safety glasses or goggles
3. Safety footwear
4. High-visibility vest
5. Hearing protection (as required)
6. Respiratory protection (as required)
7. Fall protection (as required)
8. Hand protection appropriate to hazards

Office Staff

1. Appropriate footwear
2. PPE required for specific tasks or areas

Visitors to Client Sites

1. Hard hat
2. Safety glasses
3. Safety footwear
4. High-visibility vest
5. Additional PPE as required by site

PPE PROVISION

1. ESI Safety Inc. will provide all required PPE at no cost to employees
2. Employees requiring prescription safety eyewear will be reimbursed up to [Amount]
3. Safety footwear allowance provided annually of [Amount]
4. Replacement PPE will be provided when necessary due to wear and tear
5. Employees are responsible for basic maintenance of issued PPE

PPE USE REQUIREMENTS

General Requirements

1. PPE must be used according to training and instructions
2. PPE must be inspected before each use
3. Defective PPE must not be used
4. PPE must be properly fitted
5. Required PPE must be worn at all times in designated areas
6. PPE signs must be obeyed

Specific Use Requirements

1. **Head Protection**
 - Wear hard hat with brim facing forward unless reverse orientation is required for task
 - Maintain 1-inch clearance between shell and head
 - Do not modify hard hat
 - Replace after impact
2. **Eye and Face Protection**
 - Safety glasses must have side shields
 - Face shields must be worn over safety glasses when required
 - Contact lens wearers must also wear required eye protection
 - Appropriate shade required for welding/cutting
3. **Hearing Protection**
 - Required when noise levels exceed 85 dBA
 - Insert earplugs properly and completely
 - Ensure earmuffs seal properly around ears
 - Use both earplugs and earmuffs in high noise areas
4. **Foot Protection**
 - Lace and tie boots properly
 - Keep free of excessive dirt/debris
 - Ensure appropriate protection for specific hazards (metatarsal, puncture, electrical)
5. **Hand Protection**
 - Select gloves appropriate for specific hazards
 - Inspect gloves for holes, tears, or contamination
 - Remove gloves properly to prevent contamination
 - Replace worn or damaged gloves immediately
6. **Respiratory Protection**
 - Must be properly fit tested
 - Conduct seal check before each use
 - Must be appropriate for specific hazard
 - Facial hair that affects seal is prohibited
 - Medical evaluation required before use
7. **High-Visibility Apparel**

- Must be appropriate class for work environment
 - Must be fastened properly
 - Must be clean and visible
 - Must be replaced when faded or damaged
- 8. Fall Protection**
- Inspect before each use
 - Use proper anchor points
 - Maintain 100% tie-off when required
 - Use proper connection methods
 - Follow rescue plan when in place

PPE MAINTENANCE

Cleaning and Sanitizing

1. Clean and sanitize PPE regularly
2. Follow manufacturer's cleaning instructions
3. Allow PPE to dry completely before use
4. Use mild detergents unless otherwise specified
5. Disinfect shared PPE between users

Storage

1. Store PPE in clean, dry area
2. Protect from sunlight, extreme temperatures, and chemicals
3. Store in manner that prevents damage or deformation
4. Follow manufacturer's storage recommendations
5. Do not store respiratory protection in sealed containers

Inspection

1. Inspect PPE before each use
2. Check for cracks, tears, punctures, or other damage
3. Verify function of adjustable parts
4. Check straps and fasteners for integrity
5. Document inspections of fall protection and respiratory protection

Maintenance

1. Perform maintenance according to manufacturer's instructions
2. Do not modify PPE unless authorized by manufacturer
3. Replace parts only with identical components
4. Document maintenance of complex PPE
5. Remove damaged PPE from service immediately

TRAINING REQUIREMENTS

Initial Training

All employees must receive training on:

1. When PPE is necessary
2. What PPE is necessary
3. How to properly don, doff, adjust, and wear PPE
4. Limitations of PPE
5. Proper care, maintenance, and disposal of PPE

Retraining

Retraining will be provided when:

1. Changes in workplace render previous training obsolete
2. Changes in types of PPE render previous training obsolete
3. Inadequacies in employee knowledge or use indicate need for retraining
4. New hazards are introduced
5. Regulations change

Documentation

Training documentation will include:

1. Names of employees trained
2. Date of training
3. Specific PPE covered
4. Name of trainer
5. Verification of demonstrated competence

PROGRAM EVALUATION

The PPE program will be evaluated:

1. Annually
2. After significant incidents
3. When regulations change
4. When new hazards are introduced
5. When new PPE technology becomes available

RESPONSIBILITIES

Management Responsibilities

1. Provide adequate resources for PPE program
2. Ensure hazard assessments are conducted

3. Approve PPE selections
4. Enforce PPE requirements
5. Review program effectiveness

Supervisor Responsibilities

1. Ensure employees use required PPE
2. Verify employees are trained
3. Monitor PPE condition and use
4. Enforce PPE requirements
5. Request new or replacement PPE as needed

Employee Responsibilities

1. Wear required PPE
2. Inspect PPE before use
3. Maintain PPE in clean and serviceable condition
4. Report damaged or defective PPE
5. Participate in PPE training
6. Report hazards that require new or different PPE

ENFORCEMENT

Failure to use required PPE will result in:

1. First offense: Verbal warning
2. Second offense: Written warning
3. Third offense: Disciplinary action up to and including termination
4. Immediate removal from work area until PPE is worn properly

REVIEW

This policy will be reviewed annually and updated as needed to ensure effectiveness and compliance with legislation.

19. VEHICLE SAFETY POLICY

Sl. No.	Prepared by	Approved by	Revision Date	Published date
1.	Health and Safety Department	Mathews, C Director, ESI Safety	New Program	April 28, 2025



VEHICLE SAFETY POLICY

PURPOSE

This policy establishes requirements for the safe operation of company vehicles and personal vehicles used for company business to prevent accidents and injuries.

SCOPE

This policy applies to all ESI Safety Inc. employees who operate company vehicles or personal vehicles for company business.

DEFINITIONS

Company Vehicle: Any vehicle owned, leased, or rented by ESI Safety Inc.

Authorized Driver: An employee who has been approved to drive a company vehicle or use their personal vehicle for company business based on the requirements outlined in this policy.

Company Business: Activities conducted in the course and scope of employment with ESI Safety Inc.

RESPONSIBILITIES

Management

1. Ensure all employees are aware of and comply with this Vehicle and Driving Policy
2. Maintain records of authorized drivers including driving records and insurance documentation
3. Coordinate vehicle maintenance and inspection schedules
4. Investigate all accidents and incidents involving company vehicles
5. Take appropriate action for policy violations

Supervisors

1. Enforce compliance with the Vehicle and Driving Policy
2. Ensure employees have appropriate training before operating company vehicles
3. Report vehicle maintenance issues to management
4. Review and document accidents and incidents involving employees under their supervision

Employees

1. Maintain a valid driver's license appropriate for the vehicle being operated
2. Comply with all traffic laws and regulations

3. Report any accidents, incidents, or traffic violations to their supervisor immediately
4. Report any changes in license status (suspension, revocation) within 24 hours
5. Maintain personal vehicles used for company business in safe operating condition
6. Complete required driver safety training programs

DRIVER QUALIFICATION

To qualify as an authorized driver for ESI Safety Inc., employees must:

1. Possess a valid driver's license appropriate for the vehicle to be operated
2. Be at least 21 years of age
3. Have a minimum of two years of driving experience
4. Complete a Motor Vehicle Record (MVR) check with results meeting company standards
5. Complete required driver safety training
6. Provide proof of insurance meeting minimum requirements if using a personal vehicle

Motor Vehicle Record (MVR) Standards

ESI Safety Inc. will review MVRs annually for all authorized drivers. The following violations may disqualify an employee from driving for company business:

- DUI/DWI conviction within the past 5 years
- License suspension or revocation within the past 3 years
- More than two moving violations within the past 3 years
- Any reckless driving conviction within the past 3 years
- At-fault accidents resulting in serious injury or fatality

VEHICLE USE GUIDELINES

Company Vehicles

1. Company vehicles are to be used for business purposes only, unless specifically authorized
2. Only authorized drivers may operate company vehicles
3. Passengers are limited to those with business-related needs
4. Personal use of company vehicles requires prior management approval
5. Company vehicles must not be taken home without prior authorization
6. Drivers are responsible for the security of company vehicles assigned to them

Personal Vehicles

1. Personal vehicles used for company business must meet safety standards
2. Employees must maintain minimum insurance coverage as specified in this policy
3. ESI Safety Inc. is not responsible for damage to personal vehicles during business use
4. Mileage reimbursement will be provided according to current company policy

SAFE DRIVING PRACTICES

All authorized drivers must:

1. Always wear seat belts and ensure all passengers do the same
2. Obey all traffic laws and posted speed limits
3. Maintain a safe following distance at all times
4. Adjust driving for weather and road conditions
5. Complete pre-trip inspections of vehicles
6. Not operate vehicles while under the influence of alcohol, drugs, or medications that may impair driving ability
7. Not use handheld electronic devices while driving
8. Take rest breaks during long trips to prevent fatigue

Distracted Driving

ESI Safety Inc. prohibits the following activities while operating a vehicle:

1. Using handheld cell phones for calls or texting
2. Reading or sending emails
3. Programming navigation systems while driving
4. Eating complex meals requiring two hands
5. Any other activity that diverts attention from safe driving

Employees must pull over and stop in a safe location if they need to perform any of these activities.

VEHICLE MAINTENANCE AND INSPECTION

Company Vehicles

1. Scheduled maintenance will be performed according to manufacturer recommendations
2. Drivers must conduct pre-trip inspections before operating company vehicles
3. Any defects or maintenance issues must be reported immediately
4. Vehicles with safety defects will be removed from service until repaired

Personal Vehicles

1. Employees must maintain their personal vehicles in safe operating condition
2. Regular maintenance should follow manufacturer recommendations
3. Vehicles with safety defects must not be used for company business

ACCIDENT REPORTING AND INVESTIGATION

In the event of an accident while operating a vehicle for company business:

1. Stop immediately and ensure safety of the scene
2. Call emergency services if there are injuries
3. Exchange information with other involved parties
4. Report the accident to your supervisor as soon as possible
5. Complete an Accident Report Form within 24 hours
6. Cooperate with the company investigation of the accident
7. Do not admit fault or make statements about the company's response to the accident

INSURANCE REQUIREMENTS

Company Vehicles

ESI Safety Inc. maintains insurance coverage for all company vehicles as required by law.

Personal Vehicles

Employees using personal vehicles for company business must maintain insurance with the following minimum coverage:

- Bodily Injury: \$100,000 per person/\$300,000 per accident
- Property Damage: \$50,000 per accident
- Personal Injury Protection: As required by state law

Proof of insurance must be provided annually and upon renewal of policy.

VIOLATIONS AND ENFORCEMENT

Violations of this policy may result in:

1. Suspension of driving privileges for company business
2. Disciplinary action up to and including termination
3. Financial responsibility for damages resulting from unauthorized use or policy violations

TRAINING REQUIREMENTS

All authorized drivers must complete:

1. Initial driver safety training upon hire or authorization
2. Refresher training every two years
3. Post-accident training if involved in a preventable accident
4. Special training for specialized vehicles or equipment

SPECIALIZED VEHICLES

Operation of specialized vehicles (heavy equipment, trucks requiring CDL, etc.) requires:

1. Appropriate license and endorsements
2. Specific training for the vehicle type
3. Adherence to all regulations specific to that vehicle class

REVIEW AND REVISION

This policy will be reviewed annually and revised as necessary to maintain compliance with regulations and best practices.



20. FORMS AND CHECKLISTS

Sl. No.	Prepared by	Approved by	Revision Date	Published date
1.	Health and Safety Department	Mathews, C Director, ESI Safety	New Program	April 28, 2025



FORMS AND CHECKLISTS

PURPOSE

This policy establishes standards for the development, maintenance, and use of forms and checklists to ensure consistency, accuracy, and efficiency in ESI Safety Inc.'s operations, safety procedures, and documentation practices.

SCOPE

This policy applies to all forms and checklists used within ESI Safety Inc., including safety inspections, job hazard analyses, incident reports, training records, and operational documentation.

POLICY STATEMENT

ESI Safety Inc. recognizes that well-designed forms and checklists are essential tools for consistent implementation of policies and procedures, effective data collection, and regulatory compliance. All forms and checklists shall be standardized, regularly reviewed, and properly maintained to support company operations and safety management.

FORM AND CHECKLIST MANAGEMENT

Development and Approval

1. Forms and checklists shall be developed by subject matter experts in the relevant area
2. All forms must be reviewed and approved before implementation
3. Forms shall be tested for usability before full deployment
4. Forms and checklists must comply with regulatory requirements for content and record-keeping

Document Control

1. Each form and checklist shall have a unique identifier
2. Form numbering format: [Department Code]-[Form Type]-[Sequential Number]-[Version]
3. Revision dates and version numbers shall be clearly marked
4. Obsolete forms shall be archived and removed from circulation
5. Only current, approved versions may be used

Review and Revision

1. Forms and checklists shall be reviewed:
 - Annually for safety-critical forms
 - Every two years for operational forms
 - When relevant regulations or procedures change
 - Following incidents where form inadequacy was identified
2. Revisions shall be tracked in a revision history
3. Users shall be notified when forms are updated

FORM TYPES AND REQUIREMENTS

Safety Forms and Checklists

1. Required safety forms include:
 - Job Hazard Analysis (JHA)
 - Safety Inspection Checklists
 - Incident Investigation Reports
 - Near Miss Reports
 - Safety Meeting Documentation
 - Personal Protective Equipment (PPE) Assessment
 - Confined Space Entry Permits
 - Hot Work Permits
 - Lockout/Tagout Documentation
 - Safety Training Records
2. Safety forms must include:
 - Clear instructions for completion
 - Space for signatures and dates
 - Hazard identification and control sections
 - Corrective action tracking
 - Reference to relevant policies or regulations

Operational Forms

1. Required operational forms include:
 - Daily Work Reports
 - Equipment Inspection Checklists
 - Quality Control Documentation
 - Vehicle Inspection Reports
 - Material Receiving Forms
 - Client Acceptance Forms
 - Project Documentation
2. Operational forms must include:
 - Project or job identification
 - Date and time information
 - Responsible personnel identification
 - Verification signatures
 - Quality control checkpoints

Administrative Forms

1. Required administrative forms include:
 - Employee Onboarding Documentation
 - Training Records
 - Performance Evaluation Forms
 - Time and Attendance Records
 - Expense Reports
 - Change Management Forms
 - Policy Acknowledgment Forms
2. Administrative forms must include:
 - Clear instructions
 - Data privacy notices where applicable
 - Required signature fields
 - Date fields
 - Record retention information

ELECTRONIC FORMS

Electronic Form Requirements

1. Electronic forms shall maintain the same content and approval requirements as paper forms
2. Electronic forms must include:
 - Electronic signature capabilities
 - Date/time stamps
 - Audit trail functionality
 - User access controls
 - Data validation features

Electronic Form System

1. Electronic form systems must:
 - Ensure data security and privacy
 - Control document versions
 - Provide backup and recovery
 - Allow for workflow automation
 - Support reporting and analytics
 - Maintain compliance with record retention requirements

CHECKLIST DESIGN STANDARDS

Format and Structure

1. All checklists shall:

- Use clear, action-oriented language
- Include "Yes/No/N/A" response options
- Provide space for comments
- Group related items logically
- Include critical items prominently
- Provide clear instructions

Content Requirements

1. Checklists must include:
 - Title and form ID
 - Date and time fields
 - Location information
 - Person completing the checklist
 - Verification signature
 - Follow-up action section
 - Reference to relevant standards or requirements

FORM COMPLETION AND SUBMISSION

Completion Requirements

1. Forms must be:
 - Completed in full with no blank fields (mark N/A if not applicable)
 - Signed and dated by the appropriate personnel
 - Legible and free of unauthorized alterations
 - Accurate and truthful
 - Completed within required timeframes

Submission and Routing

1. Completed forms shall be:
 - Submitted to designated personnel or department
 - Processed according to established workflows
 - Reviewed for completeness and accuracy
 - Returned for correction if incomplete
 - Filed according to record retention policies

RECORD RETENTION

Retention Requirements

1. Completed forms and checklists shall be retained according to:
 - Regulatory requirements
 - Company record retention policies

- Client contractual requirements
- Legal counsel recommendations

Retention Periods

1. Safety-critical forms: Minimum 5 years or as required by regulations
2. Training records: Duration of employment plus 3 years
3. Incident investigation forms: 5 years
4. Exposure monitoring: 30 years
5. Operational forms: 3 years
6. Administrative forms: As specified in company retention policy

TRAINING ON FORM USE

1. All employees shall receive training on:
 - Proper completion of forms relevant to their job duties
 - Purpose and importance of accurate documentation
 - Submission and routing procedures
 - Consequences of falsification or non-completion
2. Supervisors shall receive additional training on:
 - Form review responsibilities
 - Common completion errors
 - Follow-up requirements
 - Record-keeping compliance

CONFIDENTIALITY AND SECURITY

1. Forms containing sensitive information shall:
 - Be marked confidential
 - Be stored securely
 - Have restricted access
 - Be transmitted securely
 - Be disposed of properly
2. Medical and personal information shall be:
 - Separated from other records
 - Accessible only to authorized personnel
 - Protected in compliance with privacy regulations

FORM AND CHECKLIST EFFECTIVENESS

1. Form and checklist effectiveness shall be evaluated based on:
 - Completion rates
 - Quality of information collected
 - User feedback
 - Process efficiency
 - Compliance findings

- Incident investigations
- 2. Continuous improvement of forms shall be based on:
 - User suggestions
 - Regulatory changes
 - Process modifications
 - Technology updates
 - Industry best practices

RESPONSIBILITIES

Department Managers

1. Ensure appropriate forms are available and used in their department
2. Review completed forms for quality and compliance
3. Identify needs for new or revised forms
4. Ensure proper storage and retention of completed forms

Form Administrators

1. Maintain the master library of approved forms
2. Coordinate form review and revision process
3. Ensure version control
4. Archive obsolete forms
5. Train users on form completion

Supervisors

1. Ensure employees properly complete required forms
2. Review forms for accuracy and completeness
3. Address non-compliance with form procedures
4. Follow up on corrective actions identified

Employees

1. Complete required forms accurately and timely
2. Submit forms according to established procedures
3. Report problems or suggestions regarding forms
4. Participate in form-related training

REVIEW AND REVISION

This policy shall be reviewed annually and revised as necessary to ensure effectiveness and compliance with current requirements.

21. SUSTAINABILITY POLICY

Sl. No.	Prepared by	Approved by	Revision Date	Published date
1.	Health and Safety Department	Mathews, C Director, ESI Safety	New Program	April 28, 2025



SUSTAINABILITY POLICY

PURPOSE

This policy establishes ESI Safety Inc.'s commitment to sustainable business practices that balance economic growth with environmental stewardship and social responsibility, ensuring long-term business success while contributing positively to society and minimizing ecological impact.

SCOPE

This policy applies to all ESI Safety Inc. operations, facilities, employees, contractors, and business activities, including project planning, procurement, service delivery, and administrative functions.

POLICY STATEMENT

ESI Safety Inc. is committed to conducting business in a sustainable manner that meets present needs without compromising the ability of future generations to meet their own needs. We will integrate sustainability principles into our decision-making processes, business operations, and corporate culture.

SUSTAINABILITY PRINCIPLES

Triple Bottom Line Approach

ESI Safety Inc. adopts a triple bottom line approach, giving equal consideration to:

1. Economic prosperity - maintaining profitable and sustainable business growth
2. Environmental stewardship - minimizing ecological impact and conserving natural resources
3. Social responsibility - supporting employee wellbeing, community development, and ethical practices

Continuous Improvement

1. Regularly review sustainability performance
2. Set measurable sustainability objectives and targets
3. Implement innovative solutions to sustainability challenges
4. Benchmark against industry best practices

Precautionary Principle

1. Take preventive action in the face of uncertainty
2. Explore alternatives when activities may harm the environment or human health

3. Place the burden of proof on activities that may pose threats to sustainability

ECONOMIC SUSTAINABILITY

Financial Responsibility

1. Maintain long-term financial stability and growth
2. Make investment decisions considering long-term sustainability
3. Practice responsible risk management
4. Allocate resources for sustainability initiatives

Ethical Business Conduct

1. Operate with integrity and transparency
2. Prevent corruption and bribery
3. Practice fair competition
4. Uphold ethical standards in all business relationships

Innovation and Efficiency

1. Pursue continuous process improvement
2. Invest in sustainable technologies and methods
3. Reduce operational costs through resource efficiency
4. Develop sustainable service offerings

ENVIRONMENTAL SUSTAINABILITY

Carbon Footprint Reduction

1. Measure and monitor greenhouse gas emissions
2. Implement emission reduction strategies
3. Set science-based targets for carbon reduction
4. Offset unavoidable emissions through verified programs

Resource Conservation

1. Minimize consumption of water, energy, and materials
2. Implement energy efficiency measures
3. Use renewable energy sources where feasible
4. Eliminate unnecessary resource use

Waste Reduction

1. Apply the waste hierarchy: reduce, reuse, recycle
2. Aim for zero waste to landfill

3. Implement electronic waste management programs
4. Minimize hazardous waste generation

Biodiversity Protection

1. Minimize impacts on natural habitats
2. Support biodiversity conservation initiatives
3. Consider ecological impact in project planning
4. Restore disturbed areas when possible

SOCIAL SUSTAINABILITY

Employee Wellbeing

1. Provide safe and healthy working conditions
2. Offer fair compensation and benefits
3. Support work-life balance
4. Invest in employee development and training
5. Foster diversity, equity, and inclusion

Community Engagement

1. Support local community development
2. Participate in community service activities
3. Create local employment opportunities
4. Maintain open communication with community stakeholders

Human Rights

1. Respect the rights of all individuals affected by our operations
2. Prevent discrimination and harassment
3. Uphold labor rights and fair working conditions
4. Conduct human rights due diligence in operations and supply chain

Stakeholder Engagement

1. Identify and engage with key stakeholders
2. Consider stakeholder concerns in decision-making
3. Maintain transparent communication about sustainability performance
4. Collaborate with stakeholders on sustainability initiatives

SUSTAINABLE PROCUREMENT

Supplier Selection

1. Include sustainability criteria in supplier selection
2. Evaluate suppliers' environmental and social performance
3. Give preference to suppliers with sustainable practices
4. Support local and diverse suppliers

Product and Service Evaluation

1. Consider lifecycle environmental impact in purchasing decisions
2. Prioritize products with environmental certifications
3. Seek alternatives to hazardous materials
4. Choose energy-efficient equipment

Supplier Development

1. Communicate sustainability expectations to suppliers
2. Support suppliers in improving sustainability performance
3. Collaborate on sustainability innovations
4. Monitor supplier compliance with sustainability requirements

SUSTAINABLE OPERATIONS

Green Building and Facilities

1. Implement energy and water conservation measures
2. Use sustainable building materials in construction and renovation
3. Design for optimal resource efficiency
4. Pursue green building certifications when appropriate

Sustainable Transportation

1. Optimize transportation routes and logistics
2. Transition to low-emission vehicles
3. Encourage carpooling and alternative transportation
4. Minimize unnecessary travel through technology use

Sustainable Project Delivery

1. Incorporate sustainability considerations in project planning
2. Minimize environmental impact during project execution
3. Apply sustainable construction and installation practices
4. Measure and report sustainability performance of projects

EDUCATION AND AWARENESS

Employee Training

1. Provide sustainability awareness training to all employees
2. Offer specialized training for employees with sustainability responsibilities
3. Include sustainability in new employee orientation
4. Recognize and reward sustainability initiatives

Knowledge Sharing

1. Share sustainability best practices across the organization
2. Participate in industry sustainability forums
3. Collaborate with educational institutions on sustainability research
4. Publish sustainability case studies and lessons learned

MEASUREMENT AND REPORTING

Performance Indicators

1. Establish key performance indicators (KPIs) for sustainability
2. Collect and analyze sustainability data
3. Use metrics to drive improvement
4. Benchmark performance against industry standards

Reporting and Disclosure

1. Publish annual sustainability reports
2. Follow recognized reporting frameworks (e.g., GRI, SASB)
3. Verify data accuracy through internal and external audits
4. Communicate progress transparently to stakeholders

GOVERNANCE AND ACCOUNTABILITY

Sustainability Committee

1. Establish a cross-functional sustainability committee
2. Meet regularly to review sustainability performance
3. Recommend sustainability initiatives and investments
4. Report to executive management on sustainability progress

Management Responsibility

1. Integrate sustainability into strategic planning
2. Allocate resources for sustainability initiatives
3. Set sustainability expectations for all departments
4. Include sustainability in performance evaluations

Policy Integration

1. Align sustainability policy with other company policies
2. Incorporate sustainability criteria in business procedures
3. Review policies regularly for sustainability implications
4. Ensure consistent application of sustainability principles

IMPLEMENTATION STRATEGY

Action Planning

1. Develop annual sustainability action plans
2. Assign responsibilities for specific actions
3. Establish timelines and milestones
4. Allocate budgets for sustainability initiatives

Implementation Support

1. Provide tools and resources for sustainability implementation
2. Establish sustainability champions in each department
3. Create communication channels for sustainability information
4. Develop implementation guidelines for key initiatives

Monitoring and Review

1. Conduct regular sustainability audits
2. Review implementation progress quarterly
3. Adjust actions based on outcomes and challenges
4. Recognize successful implementation efforts

REVIEW AND REVISION

This policy shall be reviewed annually and revised as necessary to reflect changes in the company's operations, stakeholder expectations, regulations, and sustainability best practices.

22. MANAGEMENT OF CHANGE POLICY

Sl. No.	Prepared by	Approved by	Revision Date	Published date
1.	Health and Safety Department	Mathews, C Director, ESI Safety	New Program	April 28, 2025



MANAGEMENT OF CHANGE POLICY

PURPOSE

This policy establishes requirements and procedures for the systematic evaluation and management of changes that could affect safety, health, environmental, quality, or operational aspects of ESI Safety Inc.'s business to ensure that risks are identified and controlled before implementation.

SCOPE

This policy applies to all temporary and permanent changes to facilities, equipment, materials, processes, procedures, personnel, and organizational structures that could affect safety, health, environmental, quality, or operational aspects at ESI Safety Inc.

DEFINITIONS

Change: Any temporary or permanent alteration to facilities, equipment, materials, processes, procedures, personnel, or organizational structure.

Management of Change (MOC): A systematic process for evaluating, approving, documenting, and implementing changes to minimize risks.

Like-for-Like Replacement: A replacement that provides the same function, has the same basic design, and does not alter the process or system operation.

Emergency Change: A change implemented immediately to address an imminent safety or operational risk.

Change Initiator: The individual who identifies and proposes a change.

Change Owner: The individual responsible for implementing and closing out the change.

MOC Coordinator: The individual responsible for administering the MOC process.

Pre-Startup Safety Review (PSSR): A systematic review conducted before startup of new or modified facilities or equipment to verify that the change was properly implemented.

RESPONSIBILITIES

Executive Management

1. Establish the MOC policy and provide necessary resources
2. Ensure the MOC program is effectively implemented
3. Review and approve high-impact changes

4. Ensure changes align with company objectives and risk tolerance

Department Managers

1. Ensure MOC procedures are followed within their departments
2. Review and approve changes within their area of responsibility
3. Allocate resources for proper implementation of changes
4. Monitor change implementation and effectiveness

MOC Coordinator

1. Administer the MOC program
2. Maintain MOC documentation and records
3. Track MOC status and deadlines
4. Provide guidance on MOC requirements
5. Coordinate MOC training
6. Report MOC performance metrics to management

Change Initiator

1. Identify potential changes
2. Complete MOC request documentation
3. Provide technical information about the proposed change
4. Participate in risk assessments as needed

Change Owner

1. Develop implementation plan for approved changes
2. Coordinate resources for change implementation
3. Ensure all MOC requirements are fulfilled
4. Document change implementation
5. Close out MOC when complete

Safety Department

1. Review changes for safety implications
2. Participate in risk assessments
3. Identify risk control measures
4. Verify safety requirements are met before startup
5. Update safety documentation affected by changes

Affected Personnel

1. Participate in risk assessments and reviews as requested
2. Provide input on potential impacts of changes
3. Complete training on new or revised procedures

4. Follow revised procedures after implementation

TYPES OF CHANGES REQUIRING MOC

Facility and Equipment Changes

1. New equipment installation
2. Equipment modifications or redesign
3. Changes to control systems or instrumentation
4. Changes to safety systems
5. Process modifications
6. Layout changes

Process Changes

1. Changes to operating parameters
2. Changes to materials or chemicals
3. Changes to process sequence
4. Introduction of new processes
5. Modifications to process controls

Procedural Changes

1. New or revised operating procedures
2. Changes to maintenance procedures
3. Changes to inspection procedures
4. Changes to emergency procedures
5. Modifications to work practices

Organizational Changes

1. Changes in key personnel
2. Reassignment of responsibilities
3. Organizational restructuring
4. Changes in reporting relationships
5. Changes in staffing levels

Documentation Changes

1. Changes to policies and procedures
2. Changes to technical specifications
3. Updates to drawings and schematics
4. Revisions to safety documentation
5. Changes to training materials

CHANGES NOT REQUIRING FORMAL MOC

1. Like-for-like replacements that:
 - Use identical parts or materials
 - Do not alter functionality or performance
 - Do not introduce new hazards
 - Are installed according to original specifications
2. Routine maintenance activities that:
 - Follow established procedures
 - Do not modify equipment function
 - Restore equipment to original condition
 - Do not introduce new hazards
3. Administrative changes that:
 - Do not affect safety or operational procedures
 - Do not alter responsibilities
 - Are purely formatting or editorial

MOC RISK ASSESSMENT

Risk Assessment Process

1. Identify potential hazards associated with the change
2. Evaluate potential consequences and likelihood
3. Determine risk level using risk matrix
4. Identify risk control measures
5. Re-evaluate residual risk after controls

Risk Assessment Methods

1. What-If Analysis
2. Checklist Analysis
3. Hazard and Operability Study (HAZOP)
4. Failure Mode and Effects Analysis (FMEA)
5. Job Safety Analysis (JSA)
6. Process Hazard Analysis (PHA)

Risk Assessment Documentation

1. Description of change
2. Identified hazards
3. Risk levels before and after controls
4. Control measures
5. Residual risks
6. Assessment team members
7. Date of assessment

MOC PROCESS STEPS

Step 1: Change Identification and Request

1. Identify need for change
2. Complete MOC request form
3. Describe proposed change
4. Identify affected systems, equipment, or procedures
5. Submit to MOC Coordinator

Step 2: Initial Screening

1. MOC Coordinator reviews request
2. Determines if MOC is required
3. Assigns change classification (minor, moderate, significant)
4. Identifies required reviews and approvals
5. Assigns MOC number

Step 3: Risk Assessment

1. Assemble assessment team
2. Conduct appropriate risk assessment
3. Identify potential impacts on:
 - Safety
 - Health
 - Environment
 - Quality
 - Operations
 - Regulatory compliance
4. Document findings and recommendations

Step 4: Review and Approval

1. Technical review by subject matter experts
2. Review by affected departments
3. Review by safety department
4. Management approval based on change classification
5. Regulatory review if required

Step 5: Change Planning

1. Develop implementation plan
2. Define resource requirements
3. Develop schedule
4. Identify required training
5. Identify documentation updates

6. Define verification requirements

Step 6: Implementation

1. Execute implementation plan
2. Document implementation activities
3. Update documentation
4. Provide training
5. Communicate change to affected personnel

Step 7: Pre-Startup Safety Review

1. Verify physical installation
2. Verify documentation updates
3. Verify training completion
4. Verify regulatory compliance
5. Confirm risk controls are in place
6. Authorize startup

Step 8: Close-out and Validation

1. Monitor change performance
2. Identify any unintended consequences
3. Implement corrective actions if needed
4. Document lessons learned
5. Close out MOC

CHANGE CLASSIFICATION

Minor Change

1. Limited scope and complexity
2. Low risk potential
3. Affects single department or area
4. Examples:
 - Minor procedure revisions
 - Like-for-like equipment upgrades
 - Simple layout changes

Moderate Change

1. Moderate scope and complexity
2. Medium risk potential
3. Affects multiple departments or areas
4. Examples:
 - Equipment modifications

- Process parameter changes
- Introduction of new chemicals
- Significant procedure changes

Significant Change

1. Broad scope and high complexity
2. High risk potential
3. Affects multiple departments or facility-wide
4. Examples:
 - New process implementation
 - Major facility modifications
 - Introduction of new technology
 - Major organizational restructuring

EMERGENCY CHANGES

Emergency Change Criteria

1. Immediate action required to:
 - Prevent serious injury or death
 - Prevent significant property damage
 - Prevent severe environmental impact
 - Address critical operational failure

Emergency Change Process

1. Implement immediate controls
2. Obtain verbal approval from authorized personnel
3. Document change as soon as practical
4. Conduct risk assessment within 24 hours
5. Complete full MOC documentation within 72 hours
6. Implement additional controls as identified

TEMPORARY CHANGES

Temporary Change Requirements

1. Defined time limit (maximum 90 days)
2. Full MOC process required
3. Visual identification of temporary status
4. Tracking system for expiration
5. Evaluation for extension or permanence before expiration

Temporary Change Expiration

1. Revert to original condition
2. Extend with appropriate approval
3. Convert to permanent change with full MOC review

COMMUNICATION AND TRAINING

Communication Requirements

1. Notify affected personnel before implementation
2. Communicate change details and impacts
3. Provide updates during implementation
4. Announce completion and startup authorization

Training Requirements

1. Identify training needs for each change
2. Develop training materials
3. Document training completion
4. Verify training effectiveness
5. Update training programs for new employees

DOCUMENTATION UPDATES

Required Documentation Updates

1. Operating procedures
2. Maintenance procedures
3. Process safety information
4. Drawings and schematics
5. Equipment specifications
6. Safety documentation
7. Training materials
8. Emergency procedures

Documentation Control

1. Update documents before implementation
2. Mark superseded documents
3. Distribute updated documents
4. Remove obsolete documents
5. Archive replaced documents

MOC SYSTEM REQUIREMENTS

MOC System Features

1. Change request submission
2. Workflow management
3. Document storage
4. Approval tracking
5. Action item assignment
6. Status reporting
7. Metrics and reporting
8. Notification system

Paper-Based System Requirements

1. Standardized forms
2. Routing process
3. Status tracking
4. Document storage
5. Retention system

PERFORMANCE MEASUREMENT

Key Performance Indicators

1. Number of changes processed
2. Average processing time
3. Changes by classification
4. Emergency changes
5. Temporary changes converted to permanent
6. MOC-related incidents
7. Overdue MOC actions
8. PSSR findings

Reporting

1. Monthly metrics report to management
2. Quarterly system performance review
3. Annual program evaluation
4. Trend analysis

AUDITING AND COMPLIANCE

1. Annual MOC system audit
2. Compliance verification
3. Sampling of completed MOCs
4. Review of documentation quality
5. Verification of implementation effectiveness
6. Corrective action for identified deficiencies

RECORD KEEPING

1. Retain MOC documentation for the life of the facility or equipment
2. Maintain electronic or physical MOC records
3. Archive completed MOC packages
4. Ensure accessibility for reference and audits
5. Link MOC records to affected equipment or procedures

REVIEW AND REVISION

This policy shall be reviewed every two years or when significant changes occur in operations or regulatory requirements.

