

ACCESS MAINTENANCE

Health, Safety & Environmental (HSE) Management System

Trade name of AGHS Corp.

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HSE-01 Health, Safety & Environment Policy

1.0 PURPOSE

The purpose of this policy is to formally establish Access Maintenance's commitment to protecting the health and safety of all workers, subcontractors, clients, and members of the public who may be affected by our operations.

This policy defines the foundation of Access Maintenance's Health, Safety & Environmental (HSE) Management System and sets minimum expectations for planning, execution, supervision, and continuous improvement of safety performance across all work activities.

2.0 SCOPE

This policy applies to:

- All Access Maintenance employees
- All supervisors and management personnel
- All subcontractors and subcontractor employees
- All work activities performed under Access Maintenance control

This includes, but is not limited to, the following scopes:

- Snow clearing and winter maintenance
- Facilities maintenance services
- Landscaping services
- Emergency call-out response
- Construction, repairs, and minor works
- Confined space work
- Electrical, plumbing, and handyman services

This policy applies during day and night operations, revenue and non-revenue hours, and at all locations where Access Maintenance performs work.

3.0 POLICY STATEMENT

Access Maintenance is committed to providing a safe and healthy workplace and to conducting all operations in a manner that prevents injury, occupational illness, environmental harm, and damage to property.

Health and safety is a core business value and shall not be compromised for reasons of productivity, cost, or schedule.

Access Maintenance will:

- Comply with all applicable occupational health and safety legislation
- Meet or exceed client health and safety requirements, including those of Mosaic Transit Group
- Identify and control hazards associated with our work
- Provide competent supervision and trained personnel
- Empower workers to stop work when unsafe conditions exist
- Continuously improve our HSE performance through monitoring, review, and corrective action

4.0 STOP WORK AUTHORITY

Any worker, supervisor, or subcontractor employee has the authority to stop work without reprisal where they believe that unsafe conditions, behaviours, or hazards are present.

Work shall not resume until hazards have been assessed and appropriate controls implemented.

The exercise of stop work authority shall be supported by management at all times.

5.0 COMMITMENT TO CONTINUOUS IMPROVEMENT

Access Maintenance is committed to continuous improvement of its HSE Management System through:

- Incident and near-miss reporting and investigation
- Inspections and audits
- Review of work practices and procedures
- Ongoing training and competency development
- Management review of HSE performance

6.0 POLICY COMMUNICATION

This policy shall be:

- Communicated to all employees and subcontractors
- Reviewed during orientation
- Made available to clients and regulatory authorities upon request

HSE-02 Leadership, Accountability & Organization

1.0 PURPOSE

The purpose of this standard is to define the leadership structure, roles, responsibilities, and accountability framework governing health and safety within Access Maintenance.

Clear leadership and accountability are essential to the effective implementation and enforcement of the HSE Management System.

2.0 SCOPE

This standard applies to:

- Company directors
- Management personnel
- Supervisors
- Employees
- Subcontractors and subcontractor employees

It applies to all work activities performed under Access Maintenance control.

3.0 ORGANIZATIONAL STRUCTURE

Access Maintenance operates under the following safety leadership structure:

- Directors
- Site Supervisors
- Workers

Formal supervisory roles are in place for all operational work.

4.0 ROLES & RESPONSIBILITIES

4.1 Directors

Directors are ultimately accountable for health and safety performance.

Directors shall:

- Provide leadership and commitment to the HSE Management System
- Ensure adequate resources are available to implement safety requirements
- Ensure competent supervision is assigned to all work activities
- Support enforcement of safety rules and disciplinary measures

- Review HSE performance and corrective actions

Directors:

- Utsav Gehlot
- Navpreet Halliat

4.2 Designated HSE Representative

The Designated HSE Representative shall:

- Support development, implementation, and maintenance of HSE policies and procedures
- Support inspections, audits, and regulatory compliance
- Review incident investigations and corrective actions
- Act as a point of contact for HSE-related matters

Designated HSE Representative:

- Harsimar Viridi

4.3 Supervisors

Supervisors shall:

- Ensure work is planned and executed safely
- Conduct or review Job Safety Analyses (JSAs)
- Verify workers are trained and competent
- Enforce PPE and safety rules
- Stop work where unsafe conditions exist
- Ensure incidents and hazards are reported and addressed

Formal Supervisors:

- Pritpal Singh
- Dharminder Sahota
- Utsav Gehlot
- Navpreet Halliat
- Hardeep Singh
- Gurjant Singh
- Charanjiv Viridi

4.4 Workers

Workers shall:

- Work in compliance with HSE requirements
- Use required PPE and safety equipment
- Participate in training and safety meetings
- Report hazards, incidents, and near misses
- Exercise stop work authority where required

4.5 Subcontractors

Subcontractors shall:

- Comply with Access Maintenance HSE requirements
- Ensure their workers are trained and competent
- Cooperate with Access Maintenance supervision
- Report incidents and hazards immediately

Access Maintenance retains overall authority for health and safety on all sites under its control.

5.0 DISCIPLINE & ENFORCEMENT

Failure to comply with HSE requirements may result in:

- Verbal warning
- Written warning
- Removal from site
- Termination of employment or contract

Discipline shall be applied consistently and fairly.

6.0 CONTINUOUS IMPROVEMENT

Leadership shall review safety performance, incidents, and trends to drive continuous improvement of the HSE Management System.

HSE-03 Orientation, Training & Competency

1.0 PURPOSE

The purpose of this standard is to establish minimum requirements for worker orientation, training, and competency to ensure that all personnel performing work under Access Maintenance control are capable of carrying out their duties safely and in compliance with applicable legislation and client requirements.

2.0 SCOPE

This standard applies to all Access Maintenance employees, supervisors, management personnel, subcontractors, and any individual performing work under Access Maintenance control across all scopes including snow clearing, facilities maintenance, landscaping, emergency call-outs, electrical, plumbing, handyman, construction/repairs, and confined space work.

3.0 GENERAL REQUIREMENTS

No worker or subcontractor shall perform work unless they have completed orientation, received required training for assigned tasks, demonstrated competency (or been deemed competent by supervision), and been informed of applicable hazards and controls.

4.0 ORIENTATION

4.1 Worker Orientation

Orientation shall include overview of HSE expectations; stop work authority; roles/responsibilities; site hazards/controls; emergency procedures; PPE requirements; incident/near-miss reporting.

4.2 Subcontractor Orientation

Subcontractors shall complete orientation covering Access Maintenance requirements, reporting structure, task hazards/controls, emergency response and communication. Access Maintenance may verify orientation and competency.

5.0 TRAINING REQUIREMENTS

Training is task-specific and may include: PPE, WHMIS, working at heights, confined space awareness/entry, traffic control/public interface, first aid/CPR, and equipment-specific training.

6.0 COMPETENCY & SUPERVISION

Competency may be demonstrated by certification, experience, or demonstration under supervision. Where competency cannot be verified, workers shall be directly supervised or restricted from high-risk tasks.

7.0 SUPERVISOR RESPONSIBILITIES

Supervisors verify training/orientation, assess competency, provide instruction, stop work where required, and ensure JSAs are completed and reviewed.

8.0 REFRESHER & ADDITIONAL TRAINING

Refresher training is provided when scope/hazards change, new equipment/procedures are introduced, incidents indicate gaps, or client/legislation requires it.

9.0 DOCUMENTATION & RECORDKEEPING

Maintain orientation sign-offs, certificates, toolbox talk records, and competency assessments per document control requirements.

10.0 NON-COMPLIANCE

Non-compliance may result in removal from site, retraining, discipline, or termination of employment/contract.

11.0 CONTINUOUS IMPROVEMENT

Training effectiveness is reviewed via incidents/near misses, supervisor feedback, and audit findings.

HSE-04 Personal Protective Equipment (PPE)

1.0 PURPOSE

Establish minimum requirements for PPE selection, use, inspection, and enforcement to protect workers from hazards where risks cannot be eliminated through engineering or administrative controls.

2.0 SCOPE

Applies to all employees, supervisors, subcontractors, and visitors where PPE is required across all Access Maintenance scopes including public interface and transit environments.

3.0 GENERAL REQUIREMENTS

- PPE shall be worn whenever required by legislation, client requirements, site rules, or hazard assessments.
- PPE shall meet applicable CSA or equivalent standards, be maintained serviceable, and not be misused or altered.

Failure to use required PPE is a serious safety violation.

4.0 MINIMUM PPE REQUIREMENTS

Depending on task and environment: CSA safety footwear, high-visibility apparel, hard hats, eye/face protection, gloves, hearing protection, respiratory protection, and fall protection where required.

5.0 HAZARD ASSESSMENT & PPE SELECTION

PPE requirements are determined through JSAs, hazard assessments, and client/site rules. Supervisors ensure appropriate selection and understanding of limitations.

6.0 ROLES & RESPONSIBILITIES

Management supports enforcement and resources. Supervisors enforce PPE, stop work where needed, and remove defective PPE. Workers wear and inspect PPE and report defects. Subcontractors provide PPE and ensure compliance.

7.0 TRAINING

Workers receive PPE training; specialized training applies for respiratory and fall protection where required.

8.0 INSPECTION & MAINTENANCE

Inspect prior to use; remove defective PPE; clean and maintain reusable PPE per manufacturer instructions.

9.0 ENFORCEMENT & NON-COMPLIANCE

Non-compliance may result in work stoppage, removal from work area, discipline, or termination.

10.0 CONTINUOUS IMPROVEMENT

Review PPE effectiveness via investigations, audits, and feedback.

HSE-05 Hazard Identification & Control (Job Safety Analysis – JSA)

1.0 PURPOSE

Establish a structured process for hazard identification, risk assessment, and implementation of controls before and during work under Access Maintenance control.

2.0 SCOPE

Applies to all employees, supervisors, subcontractors, and all work activities including facilities, snow, landscaping, emergency, electrical/plumbing/handyman, construction/repairs, confined space, and public interface tasks.

3.0 DEFINITIONS

Hazard: potential source of harm. Risk: likelihood and severity. JSA: documented task-step hazard/control plan.

4.0 GENERAL REQUIREMENTS

No work proceeds unless hazards are identified, risks assessed, controls implemented, and workers understand hazards and controls. JSAs are mandatory for applicable tasks.

5.0 JSA REQUIREMENTS

5.1 When Required

JSAs are required for non-routine/high-risk tasks, scope changes, new hazards, confined space work, public interface/traffic exposure, and when client/legislation requires.

5.2 Development

JSAs break work into steps, identify hazards and controls, and are specific to the work performed.

5.3 Hierarchy of Controls

Controls follow: elimination, substitution, engineering, administrative, PPE.

6.0 ROLES & RESPONSIBILITIES

Management supports process and resources. Supervisors ensure JSAs are completed, reviewed, and enforced; stop work if hazards aren't controlled. Workers participate and follow controls; stop work if unsafe. Subcontractors participate and comply.

7.0 FIELD-LEVEL HAZARD ASSESSMENT

Ongoing hazard assessment occurs at shift start and when conditions change (weather, lighting, public movement, emergency conditions).

8.0 COMMUNICATION

Communicate hazards via JSA review/sign-off, toolbox talks, supervisor briefings, signage/barricades.

9.0 DOCUMENTATION

Maintain JSAs, toolbox talks, supervisor assessments, incident/near-miss reports.

10.0 NON-COMPLIANCE

May result in stoppage, removal, discipline, or termination.

11.0 CONTINUOUS IMPROVEMENT

Review via investigations, audit findings, and feedback.

HSE-06 Inspections, Monitoring & Audits

1.0 PURPOSE

Establish requirements for inspections, monitoring, and audits to verify compliance, identify hazards/deficiencies, and improve HSE performance.

2.0 SCOPE

Applies to all worksites and activities under Access Maintenance control, including mobile and emergency-response sites.

3.0 GENERAL REQUIREMENTS

Inspections/audits occur at risk-appropriate frequency. Findings are addressed and tracked. Systemic issues are escalated.

4.0 TYPES OF INSPECTIONS

4.1 Supervisor Inspections

Routine checks for PPE, JSA controls, equipment condition, housekeeping, and public protection measures.

4.2 Planned Inspections

Focused on higher-risk activities, changing conditions, or trend-based concerns.

4.3 Equipment/Tool Inspections

Before use and as required; defective equipment removed from service.

5.0 AUDITS

Internal audits verify system effectiveness. Client/external audits (e.g., Mosaic) are supported and findings addressed promptly.

6.0 ROLES & RESPONSIBILITIES

Management supports and reviews trends. Supervisors conduct inspections and stop work if needed. Workers cooperate and report hazards. Subcontractors participate and correct deficiencies.

7.0 CORRECTIVE ACTIONS

Immediate hazards addressed without delay; corrective actions tracked to closure; re-inspection as needed.

8.0 DOCUMENTATION

Inspection checklists, audit reports, corrective action logs, equipment inspection records.

9.0 NON-COMPLIANCE

May result in work stoppage, removal, discipline, or termination.

10.0 CONTINUOUS IMPROVEMENT

Use findings to improve procedures, controls, and training.

HSE-07 Incident Reporting & Investigation

1.0 PURPOSE

Establish requirements for reporting, investigating, documenting, and correcting incidents, near misses, and unsafe conditions.

2.0 SCOPE

Applies to all incidents during work under Access Maintenance control including injuries, public incidents, property damage, environmental impacts, and near misses.

3.0 DEFINITIONS

Incident: unplanned event causing or potentially causing harm/loss. Near miss: potential event without loss. Investigation: root cause review.

4.0 REPORTING

All incidents, near misses, and unsafe conditions must be reported immediately to supervision. Emergency situations require stop work and emergency services as needed.

5.0 CLIENT/REGULATOR NOTIFICATION

Client-impacting incidents escalated as soon as practicable with reasonable efforts within two (2) hours where applicable; regulatory notifications made where required.

6.0 INVESTIGATION

Investigations identify immediate/root causes and preventive actions; conducted to improve safety, not assign blame; level proportional to severity/potential.

7.0 CORRECTIVE/PREVENTIVE ACTIONS

Actions address causes, assigned to responsible parties, implemented in reasonable timelines, and tracked to completion.

8.0 ROLES & RESPONSIBILITIES

Management supports reporting and reviews serious incidents. Supervisors secure scenes, lead/participate investigations, and communicate controls. Workers report and cooperate. Subcontractors report and implement corrective actions.

9.0 DOCUMENTATION

Incident/near-miss reports, investigation records, corrective actions, client correspondence.

10.0 NON-COMPLIANCE

May result in removal, discipline, or termination.

11.0 CONTINUOUS IMPROVEMENT

Review incident data for trends and lessons learned.

HSE-08 Emergency Response & Crisis Management

1.0 PURPOSE

Establish requirements for preparation, response, communication, and management of emergencies during work under Access Maintenance control.

2.0 SCOPE

Applies to all employees and subcontractors and all emergency situations during day/night, revenue/non-revenue, planned and reactive work.

3.0 DEFINITIONS

Emergency: event requiring immediate response. On-call Supervisor: designated leader outside normal hours.

4.0 TYPES OF EMERGENCIES

Includes medical emergencies, fire, spills, structural failures, electrical incidents, confined space emergencies, vehicle/equipment incidents, public safety incidents.

5.0 GENERAL RESPONSE

Stop work; prioritize life safety; contact emergency services where required; secure area; notify supervision.

6.0 ROLES & RESPONSIBILITIES

Management ensures procedures and on-call coverage. Supervisors coordinate response and communications and can suspend work. Workers follow procedures and do not re-enter hazards. Subcontractors comply and cooperate.

7.0 COMMUNICATION & ESCALATION

Notify supervision immediately. For client-impacting emergencies, reasonable efforts to notify client within two (2) hours unless immediate notice required.

8.0 EVACUATION & SITE CONTROL

Evacuate to safe areas; control access; coordinate with client operations.

9.0 EMERGENCY EQUIPMENT

First aid kits, extinguishers, spill response materials, communications devices as required.

10.0 TRAINING

First aid/CPR, emergency communications, spill response, site-specific procedures as appropriate.

11.0 POST-EMERGENCY

Preserve scene if safe; investigate per HSE-07; implement corrective actions; communicate lessons learned.

12.0 DOCUMENTATION

Emergency response reports, investigations, client notifications, corrective actions.

13.0 NON-COMPLIANCE

May result in removal, discipline, or termination.

14.0 CONTINUOUS IMPROVEMENT

Review response effectiveness and improve procedures and training.

HSE-09 Traffic Management & Public Protection

1.0 PURPOSE

Establish requirements to protect pedestrians, the public, and traffic during work under Access Maintenance control.

2.0 SCOPE

Applies to all work involving public interface, including transit environments, occupied facilities, snow, landscaping, emergency response, and day/night operations.

3.0 DEFINITIONS

Public interface: work affecting pedestrians or third parties. Traffic control: measures managing movement. Barricade: barrier preventing access.

4.0 GENERAL REQUIREMENTS

Public protection takes precedence over productivity. Work shall not proceed without adequate controls.

5.0 PLANNING

Identify hazards, assess routes, select controls, and incorporate into JSAs considering visibility, lighting, weather, and volumes.

6.0 CONTROL MEASURES

Barricades/fencing/cones, signage, pedestrian detours, flag persons, lighting, and separation barriers as required.

7.0 ROLES & RESPONSIBILITIES

Management supports enforcement. Supervisors plan, implement, monitor, adjust controls, and stop work if safety can't be maintained. Workers follow controls. Subcontractors comply. Access Maintenance retains authority.

8.0 LIVE OPERATIONS

Coordinate with client operations; maintain emergency access; add supervision where needed.

9.0 NIGHT/LOW VISIBILITY

Provide lighting, reflective barriers, and reassess conditions.

10.0 INCIDENT RESPONSE

Report and manage per HSE-08 and investigate per HSE-07.

11.0 DOCUMENTATION

Traffic control plans where required, JSAs, inspections, incidents.

12.0 NON-COMPLIANCE

May result in stoppage, removal, discipline, termination.

13.0 CONTINUOUS IMPROVEMENT

Review incidents and audit findings to improve controls.

HSE-10 Confined Space Program

1.0 PURPOSE

The purpose of this standard is to establish the requirements for the safe planning and execution of confined space work conducted under the control of Access Maintenance.

This program is designed to prevent injury, illness, or fatality arising from confined space hazards and to ensure compliance with applicable legislation and client requirements.

2.0 SCOPE

This standard applies to:

- All Access Maintenance employees
- All supervisors and managers
- All subcontractors and subcontractor employees
- All confined space work performed under Access Maintenance control

This includes, but is not limited to:

- Manholes
- Vaults
- Pits
- Chambers
- Tanks
- Below-grade enclosures
- Any space meeting the definition of a confined space under applicable legislation

3.0 DEFINITIONS

For the purposes of this standard:

- Confined Space: A fully or partially enclosed space that:
 - Is not designed for continuous occupancy, and
 - Has limited or restricted means of entry or exit, and
 - May present hazards to workers
- Entry Supervisor: A competent person responsible for authorizing and overseeing confined space entry.
- Entrant: A worker authorized to enter a confined space.
- Attendant: A trained worker stationed outside the confined space to monitor entrants and initiate emergency response.

4.0 GENERAL REQUIREMENTS

No confined space entry shall occur unless:

- The space has been identified and assessed
- A confined space hazard assessment has been completed
- A Job Safety Analysis (JSA) specific to the confined space has been completed
- Required controls are implemented
- Authorized and trained personnel are assigned
- Emergency procedures are established

Confined space entry is prohibited unless all requirements of this standard are met.

5.0 ROLES & RESPONSIBILITIES

5.1 Directors

Directors shall:

- Ensure confined space activities are adequately resourced
- Support enforcement of confined space requirements
- Ensure competent personnel are appointed

5.2 Designated HSE Representative

The Designated HSE Representative shall:

- Support development and implementation of confined space procedures
- Review confined space hazard assessments and permits where required
- Participate in incident investigations related to confined space work

5.3 Site Supervisors / Entry Supervisors

Supervisors responsible for confined space work shall:

- Verify hazard assessments and permits
- Ensure workers are trained and competent
- Confirm atmospheric testing is conducted
- Ensure required controls are implemented
- Stop work where unsafe conditions exist

Supervisors have full authority to stop confined space work.

5.4 Workers

Workers shall:

- Comply with confined space procedures
- Not enter confined spaces without authorization
- Use required PPE and equipment
- Report hazards or unsafe conditions immediately

5.5 Subcontractors

Subcontractors shall:

- Comply with Access Maintenance confined space requirements
- Provide trained and competent personnel
- Coordinate procedures with Access Maintenance supervision

Access Maintenance retains overall authority for confined space safety.

6.0 HAZARD ASSESSMENT

Prior to entry, a confined space hazard assessment shall be conducted to identify:

- Atmospheric hazards (oxygen deficiency/enrichment, toxic gases)
- Engulfment hazards
- Mechanical or electrical hazards
- Flooding or water ingress
- Limited access or egress
- External hazards affecting the space

Hazard assessments shall be reviewed whenever conditions change.

7.0 ATMOSPHERIC TESTING

Atmospheric testing shall be conducted:

- Prior to entry
- Continuously or periodically during entry, as required

Testing shall include, where applicable:

- Oxygen levels

- Flammable gases or vapours
- Toxic contaminants

If unsafe atmospheric conditions are detected:

- Entry shall not proceed
- Workers shall evacuate immediately

8.0 CONTROL MEASURES

Control measures may include:

- Isolation and lockout of energy sources
- Ventilation
- Barricading and signage
- Communication systems
- PPE, including respiratory protection where required
- Use of trained attendants

Controls shall be appropriate to the identified hazards.

9.0 ENTRY PERMIT SYSTEM

Where required by legislation or client rules, a confined space entry permit shall be completed prior to entry.

Permits shall:

- Identify the confined space
- Identify hazards and controls
- Identify authorized personnel
- Specify testing requirements
- Define emergency procedures
- Be approved by a competent supervisor

Permits shall be available at the worksite during entry.

10.0 EMERGENCY RESPONSE & RESCUE

Emergency procedures shall be established prior to entry.

Rescue planning shall:

- Not rely on untrained personnel
- Identify rescue methods and equipment
- Include coordination with emergency services where applicable

Workers shall not enter a confined space to perform rescue unless trained and authorized.

11.0 TRAINING & COMPETENCY

Only trained and competent personnel shall:

- Enter confined spaces
- Act as attendants
- Act as entry supervisors

Training shall include:

- Hazard recognition
- Atmospheric testing
- Use of equipment
- Emergency response procedures

12.0 DOCUMENTATION & RECORDKEEPING

Documentation may include:

- Confined space assessments
- Entry permits
- Atmospheric testing records
- Training records
- Incident reports

Records shall be retained in accordance with document control requirements.

13.0 NON-COMPLIANCE

Failure to comply with confined space requirements may result in:

- Immediate work stoppage
- Removal from site
- Disciplinary action
- Termination of employment or contract

14.0 CONTINUOUS IMPROVEMENT

Confined space activities shall be reviewed to:

- Identify trends
- Improve procedures
- Enhance training and controls

HSE-11 Subcontractor Health & Safety Management

1.0 PURPOSE

Establish requirements for selection, orientation, supervision, and monitoring of subcontractors performing work under Access Maintenance control, ensuring compliance with legislation and client requirements.

2.0 SCOPE

Applies to all subcontractors and subcontractor employees engaged by Access Maintenance across scopes including facilities, electrical/plumbing, handyman, landscaping, snow, construction/repairs, and confined space work.

3.0 GENERAL REQUIREMENTS

Subcontractors must comply with Access Maintenance HSE requirements, applicable legislation, and client-specific requirements. Access Maintenance retains overall authority for health and safety on sites under its control.

4.0 PRE-QUALIFICATION

As appropriate to risk, subcontractors may be required to provide WSIB clearance, insurance, training/competency evidence, and safety procedures.

5.0 ORIENTATION

Subcontractors complete orientation covering HSE requirements, reporting structure, task hazards/controls, emergency response/escalation, and stop work authority.

6.0 PLANNING & HAZARD CONTROL

Subcontractors participate in JSAs, hazard assessments, and coordination meetings. JSAs define responsibilities and controls.

7.0 SUPERVISION & MONITORING

Supervisors monitor compliance, conduct inspections, stop work where unsafe, and escalate deficiencies.

8.0 TRAINING & COMPETENCY

Subcontractors ensure competent, trained workers and required certifications. Access Maintenance may remove personnel not meeting requirements.

9.0 INCIDENT REPORTING

Subcontractors report incidents immediately, participate in investigations, and implement corrective actions per HSE-07.

10.0 ENFORCEMENT

Non-compliance may result in work stoppage, removal, suspension, or termination of subcontract.

11.0 DOCUMENTATION

Maintain pre-qualification records, orientation records, training verification, inspections, incidents.

12.0 CONTINUOUS IMPROVEMENT

Review subcontractor performance via audits, incidents, and feedback; implement improvements.

HSE-12 Environmental Management

1.0 PURPOSE

Establish requirements for identifying, controlling, and mitigating environmental risks associated with work under Access Maintenance control to prevent environmental damage and ensure compliance.

2.0 SCOPE

Applies to all employees, supervisors, and subcontractors across facilities, landscaping, snow, emergency response, construction/repairs, electrical/plumbing, and transit/public environments.

3.0 ENVIRONMENTAL RISKS

May include fuel/oil spills, improper waste handling, hazardous substance releases, soil/water contamination, improper storage, noise/dust/debris.

4.0 GENERAL REQUIREMENTS

Environmental protection is integrated into planning/execution. Risks are assessed and controlled; incidents reported promptly.

5.0 PLANNING & CONTROLS

Controls may include proper storage, spill containment, drain/waterway protection, dust/debris control, noise mitigation, and waste segregation/disposal.

6.0 SPILL PREVENTION & RESPONSE

Prevent via proper storage and available response materials. Respond by stopping work, containing safely, notifying supervision, cleaning up appropriately, and notifying client/regulators where required.

7.0 ROLES & RESPONSIBILITIES

Management supports controls; supervisors implement and monitor; workers comply and report; subcontractors comply and report. Access Maintenance retains authority.

8.0 TRAINING & AWARENESS

Spill response, waste handling, hazard recognition appropriate to scope.

9.0 INCIDENT REPORTING

Environmental incidents reported and investigated per HSE-07; corrective actions implemented.

10.0 DOCUMENTATION

Spill reports, waste disposal records, inspections, incident reports.

11.0 NON-COMPLIANCE

May result in stoppage, removal, discipline, termination.

12.0 CONTINUOUS IMPROVEMENT

Review incidents and audit findings to improve controls.

HSE-13 Safety Communication & Consultation

1.0 PURPOSE

The purpose of this standard is to establish requirements for communication, consultation, and worker participation in health and safety, including toolbox talks, safety meetings, and reporting of hazards.

2.0 SCOPE

Applies to all employees, supervisors, and subcontractors performing work under Access Maintenance control across all scopes and sites.

3.0 GENERAL REQUIREMENTS

Access Maintenance promotes active communication and consultation on safety matters. Workers are encouraged to raise concerns and participate in safety discussions without reprisal.

4.0 TOOLBOX TALKS / PRE-JOB BRIEFINGS

Supervisors shall conduct toolbox talks or pre-job briefings at a frequency appropriate to scope and risk, including:

- New or changing hazards
- Public interface risks
- Weather, lighting, and site condition changes
- Lessons learned from incidents and near misses
- Review of JSAs and critical controls

5.0 SAFETY MEETINGS

Safety meetings may be held to review performance, trends, corrective actions, and upcoming high-risk activities. Participation of subcontractors shall be required where relevant.

6.0 REPORTING & FEEDBACK CHANNELS

Hazards, near misses, and safety concerns may be raised to supervisors immediately. Matters requiring escalation may be directed to management or the designated HSE representative.

7.0 DOCUMENTATION

Records may include toolbox talk logs, attendance records, and action items. Records are retained per document control requirements.

8.0 NON-COMPLIANCE

Failure to participate in required communications may result in corrective action or removal from site.

9.0 CONTINUOUS IMPROVEMENT

Communication effectiveness shall be reviewed through feedback, audit findings, and incident trends.

HSE-14 Occupational Health & Hygiene

1.0 PURPOSE

The purpose of this standard is to establish requirements for occupational health protection, including recognition of occupational illness hazards and reasonable measures to prevent exposure.

2.0 SCOPE

Applies to all employees and subcontractors under Access Maintenance control, including work in facilities, landscaping, construction/repairs, snow operations, and confined space work where applicable.

3.0 GENERAL REQUIREMENTS

Occupational health hazards shall be identified and controlled through planning, JSAs, and safe work practices.

4.0 POTENTIAL OCCUPATIONAL HEALTH HAZARDS

May include:

- Chemical exposure (cleaners, fuels, sealants)
- Biological hazards (wastewater environments, mold)
- Noise and vibration
- Ergonomic strain (repetitive work, manual handling)
- Heat/cold stress (winter operations and outdoor work)
- Dust and airborne contaminants

5.0 CONTROL MEASURES

Controls may include substitution, ventilation, safe storage/handling, hygiene practices, job rotation, mechanical aids, and PPE (including respiratory protection where required).

6.0 FIT FOR WORK

Workers shall report if they are not fit for work due to illness, fatigue, impairment, or medication impacts that may affect safety.

7.0 TRAINING & AWARENESS

Training may include WHMIS, safe chemical handling, ergonomic techniques, and recognition of heat/cold stress.

8.0 DOCUMENTATION

Records may include training records, hazard assessments, and incident reports.

9.0 NON-COMPLIANCE

Non-compliance may result in work stoppage, removal from site, or disciplinary action.

10.0 CONTINUOUS IMPROVEMENT

Occupational health controls are reviewed through incidents, worker feedback, and audits.

HSE-15 First Aid & Return to Work

1.0 PURPOSE

The purpose of this standard is to establish requirements for first aid readiness and return-to-work (RTW) support following a workplace injury or illness, consistent with Access Maintenance responsibilities and applicable requirements.

2.0 SCOPE

Applies to all employees and, where applicable, subcontractors under Access Maintenance control.

3.0 FIRST AID READINESS

Access Maintenance shall maintain first aid capability appropriate to operations. Where required, first aid trained personnel shall be available. (Current: approximately 10 personnel are first aid trained.)

4.0 INJURY MANAGEMENT

All injuries shall be reported immediately to supervision and managed per HSE-07 (Incident Reporting & Investigation) and HSE-08 (Emergency Response) where applicable.

5.0 RETURN TO WORK (RTW)

Access Maintenance supports safe and reasonable return to work where practicable. RTW may include modified duties consistent with medical restrictions and operational needs.

6.0 COORDINATION

Where required, Access Maintenance will coordinate with applicable insurers/WSIB processes and client requirements for reporting and documentation.

7.0 CONFIDENTIALITY

Medical information shall be handled confidentially and shared only on a need-to-know basis to support safe work planning.

8.0 DOCUMENTATION

Records may include incident reports, first aid records, RTW plans, and communications required by applicable processes.

9.0 NON-COMPLIANCE

Failure to report injuries or comply with RTW requirements may result in corrective action.

10.0 CONTINUOUS IMPROVEMENT

RTW and first aid readiness are reviewed through incident trends and feedback.

HSE-16 Document Control & Records Management

1.0 PURPOSE

Establish requirements for creation, approval, distribution, control, retention, and revision of HSE documents and records to ensure only current, approved documents are used and records demonstrate compliance.

2.0 SCOPE

Applies to all HSE documents and records used under Access Maintenance control and all personnel who create or use HSE documentation.

3.0 DOCUMENT TYPES

Includes policies, standards, JSAs, procedures, emergency response procedures, inspection/audit forms, incident reports, training records, permits and authorizations.

4.0 DOCUMENT CONTROL

4.1 Approval: Controlled documents reviewed and approved by management or designated HSE personnel; outdated documents not used.

4.2 Distribution: Documents available and accessible to relevant personnel.

4.3 Revisions: Reviewed periodically or when changes occur; superseded documents removed from use.

5.0 RECORDS MANAGEMENT

5.1 Retention: Records retained per legal/client requirements and record type.

5.2 Storage: Protected from damage/loss and unauthorized access; retrievable format.

6.0 ROLES & RESPONSIBILITIES

Management supports processes and resources. Designated HSE supports control and audits. Supervisors ensure current docs are used and records completed. Workers/subcontractors follow current documents and do not alter them without authorization.

7.0 AUDIT & REVIEW

Practices may be reviewed via internal/client/regulatory audits; deficiencies addressed through corrective action.

8.0 NON-COMPLIANCE

May result in removal, discipline, or termination.

9.0 CONTINUOUS IMPROVEMENT

Review processes to improve usability, compliance, and operational alignment.

HSE-17 Definitions & Glossary

1.0 PURPOSE

Define key terms used throughout the Access Maintenance HSE Management System to ensure clarity and consistent interpretation. Where not defined, applicable legislation and recognized standards apply.

2.0 SCOPE

Applies to all HSE policies, standards, procedures, and forms and all personnel performing work under Access Maintenance control.

3.0 DEFINITIONS

Access Maintenance: Trade name under which AGHS Corp. conducts services.

AGHS Corp.: Legal entity operating under the trade name Access Maintenance.

Audit: Systematic process to evaluate compliance with HSE requirements.

Competent Person: Qualified through knowledge, training, and experience.

Confined Space: Enclosed space not designed for continuous occupancy with restricted entry/exit and potential hazards.

Corrective Action: Action to eliminate cause of non-conformity/incident.

Emergency: Unplanned event requiring immediate response.

Hazard: Potential source of harm.

HSE Management System: Framework to manage HSE risks.

Incident: Unplanned event causing or potentially causing harm/loss.

Job Safety Analysis (JSA): Documented task-step hazard/control plan.

Near Miss: Event with potential for harm without resulting loss.

PPE: Equipment worn to protect against hazards.

Public Interface: Work affecting pedestrians or third parties.

Risk: Likelihood and severity of harm.

Subcontractor: Individual/organization engaged by Access Maintenance.

Supervisor: Competent person directing work and enforcing HSE requirements.

Worker: Person performing work under Access Maintenance control.

4.0 INTERPRETATION

If ambiguity exists: legislation takes precedence; client requirements followed where more stringent; management provides clarification.

5.0 REVIEW & UPDATE

Reviewed periodically and updated as needed.

HSE-18 Equipment Inspection & Preventive Maintenance

1.0 PURPOSE

Establish requirements for inspection, preventive maintenance, and record retention for all company-owned, leased, or operated equipment to ensure compliance with manufacturer specifications, regulatory requirements, and client expectations.

2.0 SCOPE

Applies to all mobile equipment, service trucks, skid steers, pressure washing units, generators, power tools, fall protection equipment, and safety equipment used under Access Maintenance control.

3.0 GENERAL REQUIREMENTS

All equipment shall be inspected prior to use, maintained in accordance with manufacturer specifications, comply with applicable legislation and client requirements, and be removed from service if defective or unsafe.

4.0 PRE-USE INSPECTIONS

Operators shall complete pre-use inspections appropriate to the equipment type. Deficiencies shall be reported immediately to supervision.

5.0 DEFECT MANAGEMENT

If equipment is unsafe, it shall be tagged “Out of Service”, removed from operation, and not returned until repaired and verified safe.

6.0 PREVENTIVE MAINTENANCE

Preventive maintenance shall be performed at manufacturer-recommended intervals, based on operating hours, seasonal requirements, or inspection findings.

7.0 RECORD RETENTION

Inspection and maintenance records shall be retained in accordance with Document Control procedures.

8.0 ROLES & RESPONSIBILITIES

Management ensures resources are available. Supervisors verify inspections. Workers conduct inspections and report defects.

9.0 CONTINUOUS IMPROVEMENT

Maintenance trends shall be reviewed periodically.

HSE-19 Substance Abuse & Fit for Duty Policy

1.0 PURPOSE

Ensure all personnel are fit for duty and not impaired.

2.0 POLICY

Zero tolerance for working under the influence of drugs or alcohol.

3.0 TESTING

Testing may include for cause, post-incident, and client-required testing where legally permissible.

4.0 ENFORCEMENT

Violation may result in removal from site, suspension, or termination.

HSE-20 Environmental Incident Investigation Procedure

1.0 PURPOSE

Establish a formal process for investigating environmental incidents.

2.0 REPORTING

All environmental incidents must be reported immediately. Client and regulatory notification shall occur where required.

3.0 INVESTIGATION

Identify immediate cause, root cause, contributing factors, and corrective actions.

4.0 CORRECTIVE ACTIONS

Actions shall be assigned, tracked, and verified.

5.0 MANAGEMENT REVIEW

Environmental incidents shall be reviewed periodically (minimum quarterly).

HSE-21 Modified Work & Return-to-Work Procedure

1.0 PURPOSE

Provide structured procedures for modified work following injury or illness.

2.0 PROCESS

Medical restrictions reviewed. Duties matched within restrictions. Communication maintained with worker and insurer where applicable.

3.0 DOCUMENTATION

Records maintained confidentially.

HSE-22 Quality Management Policy & Program

1.0 POLICY STATEMENT

Access Maintenance is committed to delivering services that meet or exceed client expectations, complying with regulatory requirements, maintaining documented procedures, and continuously improving operations.

2.0 QUALITY FRAMEWORK

Includes document control, inspection verification, corrective action tracking, and management review.

3.0 CONTINUOUS IMPROVEMENT

Management periodically reviews incidents, feedback, audits, and corrective actions to improve performance.

INCIDENT INVESTIGATION REPORT

Access Maintenance
Document No: HSE-IR-01
Revision: 1.0
Effective Date: _____

SECTION 1 – GENERAL INFORMATION

Date of Incident: _____
Time of Incident: _____
Project / Site Location: _____
Client (if applicable): _____
Supervisor on Site: _____
Weather Conditions (if applicable): _____

SECTION 2 – PERSON(S) INVOLVED

Name: _____
Employer (Access / Subcontractor): _____
Job Title: _____
Injury Type (if applicable): _____
Medical Treatment Required? Yes No
Lost Time Expected? Yes No

SECTION 3 – INCIDENT CLASSIFICATION

- First Aid
- Medical Aid
- Lost Time Injury
- Near Miss
- Property Damage
- Environmental Incident
- Rail / Rule Violation
- Other: _____

SECTION 4 – INCIDENT DESCRIPTION

Provide factual description only (who, what, when, where):

SECTION 5 – IMMEDIATE ACTIONS TAKEN

- Work stopped
- Area secured
- First Aid administered
- Emergency services contacted
- Client notified
- Protection / Run Sheet verified
- Other: _____

SECTION 6 – ROOT CAUSE ANALYSIS

Immediate Cause(s):

Underlying / Root Cause(s):

- Training deficiency
- Procedure not followed
- Inadequate supervision
- Equipment failure
- Hazard not identified
- Environmental condition
- Communication failure
- Other: _____

SECTION 7 – CORRECTIVE ACTION PLAN

SECTION 8 – CLIENT / REGULATORY REPORTING

- Client notified (Date/Time): _____
- WSIB notified (if required)
- MOL notification required
- Internal Management notified

SECTION 9 – MANAGEMENT REVIEW & SIGN-OFF

Investigation Completed By (Supervisor):

Name: _____

Signature: _____

Date: _____

Reviewed By (Operations Manager):

Name: _____

Signature: _____

Date: _____

PROCEDURE – INCIDENT INVESTIGATION

1. All incidents, injuries, near misses, property damage, or unsafe conditions must be reported immediately to the Supervisor.
2. Work must stop where a hazard exists.
3. The Supervisor shall secure the area and ensure no further risk is present.
4. An investigation must begin within 24 hours.
5. The investigation must identify immediate and root causes.
6. A corrective action plan must be developed with assigned responsibilities and completion dates.
7. Management must review and sign off on all investigations.
8. Corrective actions must be tracked to closure.
9. Lessons learned shall be communicated during toolbox talks.
10. Documentation shall be retained in the HSE records.