



WHITESTONE REIT

**OCCUPATIONAL SAFETY  
AND HEALTH  
POLICY AND PROCEDURES MANUAL  
2019**



WHITESTONE REIT

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## **Forward**

Whitestone REIT is committed to the health and safety of all our associates. The purpose of the Health and Safety Policies and Procedures is to guide and direct all associates to work safely and prevent injury, to themselves and others. All associates are encouraged to participate in developing, implementing, and enforcing Whitestone REIT Health and Safety Policies and Procedures. All associates must take all reasonable steps to prevent accidents and never sacrifice safety for expedience. Our goal is to eliminate or minimize hazards that can cause accidents. It is company policy that all associates be given a copy of the policies manual and be familiar with its contents.

This policy will be reviewed annually. (Current revision: February 2019)

Together we can achieve a safe and happy work environment.

## **Health and Safety Policy**

Whitestone REIT is committed to following the Occupational Safety and Health Act ("Act"), the goal of providing and maintaining a healthy and safe working environment, with a vision of continuous improvement. This goal is only achievable by fostering an enthusiastic commitment to health, safety and the environment within Whitestone REIT personnel, contractors and visitors.

In particular:

- Management will strive to take all reasonable steps to reduce workplace hazards to as low as reasonably achievable.
- Supervisors and managers are held accountable for the health and safety of all associates under their supervision. This includes responsibility for applicable training and instruction, appropriate follow-up on reported health and safety concerns, and implementation of recommended corrective action. This accountability is integrated into the performance appraisal system.
- Supervisors, workers and visitors are expected to perform their duties and responsibilities in a safe and healthful manner, and are accountable for the health and safety of themselves and others.
- Whitestone REIT is committed to providing all necessary training and instruction to ensure that appropriate work practices are followed on the job, and to promote their use off the job.
- If necessary, Whitestone REIT will take disciplinary action where individuals fail to work in a healthy and safe manner, or do not comply with applicable Act or corporate policies and procedures.

Health, safety, the environment and loss control in the workplace are everyone's responsibility. Whitestone REIT expects that everyone will join in our efforts to provide a healthy and safe working environment on a continuous day-to day-basis. Only through the dedication and efforts of all individuals can Whitestone REIT succeed in providing a healthy, safe working environment.

# **Occupational Health and Safety in Workplaces**

## **Duties of Workers**

### **Occupational Health and Safety and You**

One of your most important responsibilities is to protect your health and safety as well as that of your co-workers. This booklet will discuss some of your duties under the Act and help you to make your workplace safer and healthier.

### **What the law requires**

Workplaces under the jurisdiction are governed by the Act. The Act places duties on owners, employers, workers, suppliers, the self-employed and contractors, to establish and maintain safe and healthy working conditions.

### **Duties of Your Employer**

Your employer is responsible for providing you with safe and healthy working conditions. This includes a duty to protect you from violence, discrimination and harassment. You must cooperate with your employer in making your workplace safe and healthy.

### **Your Responsibilities**

You must also comply with the Act. You have responsibilities to:

- protect your own health and safety and that of your co-workers;
- not initiate or participate in the harassment of another worker; and
- co-operate with your supervisor and anyone else with duties under the Act.

### **Your Rights**

The Act gives your three rights:

- the right to know the hazards at work and how to control them;
- the right to participate in Occupational Health and Safety; and
- the right to refuse work which you believe to be unusually dangerous.

You may not be punished for using these rights. An employer can be required to legally justify any action taken against a worker who is active in health and safety.

### **Your Right to Know**

The Act requires your employer to provide you with all the information you need to control the hazards you face at work. If you are inexperienced, you must receive an orientation which includes;

- What to do in a fire or other emergency;
- First aid facilities;

- Prohibited or restricted areas;
  - Workplace hazards; and
  - Any other information you should know.
- You must also be supervised by a competent supervisor.

## **Your Right to Participate**

You have the right to become involved in Occupational Health and Safety. The Act encourages employers and workers to work together to maintain a healthy and safe workplace.

### **Safety Committee Has Duty To:**

- Regularly inspect the workplace;
- Assist with accident investigations;
- Deal with the Health and Safety concerns of associates;
- Investigate refusals to work;

## **Your Right to Refuse**

You have the right to refuse to do work which you believe is unusually dangerous. The unusual danger may be to you or to anyone else. An unusual danger could include such things as:

- a danger which is not normal for your occupation or the job;
- a danger under which you would not normally carry out your job; and/or
- a situation for which you are not properly trained, equipped or experienced.

To exercise this right, use the following guidelines:

1. Once you believe that the work you have been asked to do is unusually dangerous, you should inform your supervisor.
2. Make sure that the supervisor understands that you are refusing to do the disputed job for health and safety reasons.
3. Work with the supervisor to attempt to resolve the problem.

If the problem cannot be resolved by the supervisor to your satisfaction, you may contact the Safety Officer. You also have the right to contact Human Resources at any time.

### **Do not leave the site without the permission of your employer.**

Your supervisor should contact the Safety Officer and ask them to investigate. They will try to resolve the matter. If they cannot resolve the matter to your satisfaction, they will convene the Occupation Health and Safety Committee for an emergency meeting. The committee will investigate and prepare a report on the refusal.

You have the right to continue to refuse until:

- measures have been taken to satisfy you that the job is now safe to perform; or
- Your Occupation Health and Safety Committee has investigated and ruled against your refusal.

If you disagree with the decision of the Committee, you may appeal to Human Resources

An employer cannot assign another worker to do the disputed job unless the replacement worker is advised in writing:

- of the refusal and the reasons for it;
- of the reasons why the employer believes that the replacement worker can do the disputed job safely;
- that the replacement worker also has the right to refuse; and
- of the steps to follow when exercising this right.

## **Responsibilities**

### **Safety Officer**

The Safety Officer is accountable to Human Resources and is responsible for Occupational Health & Safety performance for all associates in their Region at all levels. The Safety Officer must provide leadership in all aspects of health and safety activities at work or otherwise. The safety officer must take an active role in all aspects of safety, within their Region.

## **Duties**

### **Safety Officer**

1. Ensure that all reasonable steps are taken to prevent accidents.
2. Be familiar with Occupational Health & Safety act, the company policy and any other Act pertaining to health or safety.
3. Ensure all policies and Act is followed by all levels of associates.
4. Ensure safety meetings are held and minutes are recorded, posted and filed accordingly to Occupational Health & Safety regulations.
5. Ensure all accidents are reported and investigated.
6. Ensure SDS (Safety Document Sheets) are provided for all hazardous materials delivered to the workplace and are readily available for associates to review.
7. Ensure associates are instructed in the procedures and requirements of Occupational Health & Safety.
8. Review all accidents and near misses to determine root and basic causes, with suggestion/implementation of changes to prevent re-occurrence.

### **Associates**

- 1) Comply with all Company Procedures, Safety Policy and requirements of Occupational Health & Safety.
- 2) Be responsible for working safely and carrying out their duties with skill and care as to not cause accidental injury to themselves, fellow associates or the general public.

- 3) Immediately report all injuries, near misses or potential hazards to their supervisor.
- 4) Know the location of all fire extinguishers, fire alarms or other warning devices.
- 5) Ensure all personal safety equipment is being used properly.
- 6) Never engage in horse play or tomfoolery.
- 7) Maintain clean and orderly work area.
- 8) When in doubt.... ASK

## **Suppliers**

- 1) Provide SDS for all hazardous material stored on our properties.
- 2) Ensure all reasonable steps are taken to prevent an accident.
- 3) Be familiar with Occupational Health & Safety Act.

## **General Safety Rules**

- 1) All accidents, injuries or near misses, regardless of their nature, shall be promptly reported to the safety officer.
- 2) Clothing shall be appropriate to the duties being performed.
- 3) Running is not permitted except in extreme emergencies.
- 4) Visitors and customers are to be escorted by staff while on company property.
- 5) Hand tools are to be used for their intended purpose only.
- 6) Horseplay, fighting or tomfoolery is strictly prohibited on Whitestone REIT premises.
- 7) All spills will be immediately cleaned up and reported.
- 8) Drawers and filing cabinets will be kept closed when not in use.
- 9) Filing cabinet drawers are to be filled from the bottom up or the cabinet is to be securely fastened /anchored.

## **Safety Tips**

- 1) If you are not sure.....ask.
- 2) Follow instructions and don't take chances.
- 3) Wear your personal safety equipment.
- 4) Never operate equipment you have not been trained for.
- 5) Keep your work area clean.
- 6) Avoid injury by lifting correctly. Max weight to be lifted by one person is 75lbs.
- 7) Make sure the job can be done safely.

Portable ladders must be secured against movement and placed on a base that is stable; the base of an inclined portable ladder is to be no further from the base of the wall or structure than  $\frac{1}{4}$  of the height to where the ladder contacts the wall or structure.

## **First Aid**

An employer must ensure that the first responders at a work site have successfully completed a first aid training course and hold a valid certificate in first aid.

An employer must keep record at the site of workers who are first responders and



post these names where they are accessible by all associates.

Every Region must have a first aid kit on site; each kit must contain the following:

- a) Antiseptic cleansing towelettes, individually packaged
- b) Sterile adhesive dressings, individually packaged
- c) Sterile gauze pads, individually packaged
- d) Sterile compress dressings, with ties individually packaged
- e) 1 pair of scissors
- f) 1 pair of tweezers
- g) Adhesive tape
- h) Crepe tension bandage – 75mm wide
- i) 1 resuscitation barrier device with a one-way valve
- j) Disposable surgical gloves
- k) 1 first aid instruction manual (condensed)
- l) inventory of kit contents
- m) 1 waterproof waste bag

## **Accident and Near Miss Reporting**

### **Requires First Aid- Treat at the scene**

Supervisor – Complete Supervisor Report of Injury (state WC form or internal investigation form)

Abate any unsafe conditions identified in injury investigation

Train all associates on how to prevent similar injury

### **Requires medical treatment –Transport associate to designated network medical clinic**

Supervisor – Complete Supervisor Report of Injury (state WC form or internal investigation form)

Notify Management of Injury

Abate any unsafe conditions identified in injury investigation

Train all associates on how to prevent similar injury

HR – Complete First Report of Injury if not done by supervisor

Complete DWC 3 – Employers Wage Statement

Submit Claim to WC Carrier within 3 days of Injury

### **Serious Injury – Call 911 for Emergency Medical to Area Hospital**

Supervisor – Complete Supervisor Report of Injury (state WC form or internal investigation form)

Notify Management of Injury

Comply with Doctors restrictions on associate's return to work (further known as "RTW")

Abate any unsafe conditions identified in injury investigation

Train all associates on how to prevent similar injury

HR – Complete DWC 3 – Employers Wage Statement  
Submit Claim to WC Carrier within 3 days of Injury  
Log Medical treatment on OSHA 300 Log  
Report to OSHA directly for Fatality, Hospitalization, Amputation, Loss of Eye  
Review Doctors restrictions on RTW and match with Job Descriptions to identify tasks  
Communicate with injured employee at least weekly and after any scheduled medical appt.

## **Accident Investigation Policy**

All accidents that result in injury or property damage or that could have resulted in serious injury or property damage (near miss) must be thoroughly investigated. The investigation must determine the cause of the incident so that appropriate action can be taken to prevent recurrence. The Safety Officer shall be responsible for conducting the investigation. The investigation report shall be completed as soon as possible after the incident and reported to the COO. The Safety Officer and appropriate supervisor shall determine what steps are to be taken to prevent recurrence. Any disputes arising from the investigation will be investigated and arbitrated by Human Resources.

## **Alcohol and Drug Policy**

It is the responsibility of all associates to ensure an alcohol and drug free environment. If there is any awareness or suspicion that any associate, supplier, or visitor is under the influence of illegal narcotics or alcohol, they will be removed from the premises immediately.

Should an associate report to work while under the influence of such substances, the associate will be taken home either in a cab or by the Regional Manager.

**This is a zero tolerance policy**

## **Disciplinary Action**

Careless work and irresponsible behavior directly affect the quality of health and safety in the workplace. Even absenteeism influences safety by placing more duties on fellow associates.

The following instances shall be cause for verbal or written warning and possible dismissal:

- 1) Health and safety violations
- 2) Poor conduct or misconduct
- 3) Theft
- 4) Sexual harassment
- 5) Racial discrimination
- 6) Carelessness

- 7) Willful damage to company property
- 8) Drug or alcohol use

Compliance with company and legislative safety standards is necessary to maintain a safe and healthy work environment. As with any program, non-compliance issues must be dealt with.

The following is a guideline for disciplinary actions for safety infractions based on seriousness of the offense.

\*First offense, associate will be given a documented verbal warning

\*Second offense, associate will be given a written warning and suspension (suspension to fit seriousness of the offense).

\*Third offense, associate may be suspended or terminated (suspension or termination to fit seriousness of the offense).

## **Hazard Warning Signs**

Whenever possible, warning signs will be displayed where a potential hazard may cause injury. Warning signs must be strictly adhered to. Warning signs must be posted where hazards exist and must not be removed unless hazard has been controlled.

## **Environmental Policy**

Whitestone REIT is Committed to the protection of the environment for present and future generations. All associates are responsible for incorporating into their planning and work the actions necessary to fulfill this commitment.

Whitestone REIT will meet these responsibilities by endeavoring to provide the resources for continuing to:

- Design and manage our operations to meet or surpass applicable environmental laws.
- Work in partnership with customers, suppliers, trade associations and government agencies to promote the environmentally safe handling and disposition of materials and products.
- Acquire knowledge and technologies to improve the environmentally save efficient use of our processes and products.
- Formulate and implement effective environmental emergency response systems.
- Involve our associates in our environmental programs and keep them informed of our performance.
- Promote associate awareness of this policy and enhance their capabilities to implement this policy.

## Acknowledgement & Agreement Receipt

Date \_\_\_\_\_

I, \_\_\_\_\_, hereby acknowledge receipt of the Whitestone REIT "**Occupational Safety & Health Manual**".

I have read, understand and agree to the terms of employment and will carry out and abide by the operational procedures and rules as outlined therein.

**I agree:**

To adhere to all company policies and procedures.

To the use of safety equipment, at all times, which is required by my safe work procedures and by my clients.

That government and client regulations shall be complied with at all times.

That I am responsible and accountable for my health and safety performance.

Associate's Signature:

\_\_\_\_\_

Manager, Whitestone REIT:

\_\_\_\_\_

This page is to be placed in associate's file at time of signing.