
 <b>HEALTH, SAFETY &amp; ENVIRONMENTAL PROGRAM</b>	<b>Section 4: Subcontractor Management</b>		
	APPROVED BY: Sarhan Abu-Kwiek	COR Elements: 4	
	APPROVAL DATE: 02/24/2023	DATE OF ORIGIN: 02/02/2023	REVISION # 1
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## SUBCONTRACTOR MANAGEMENT PROCEDURE

### PURPOSE

The purpose of this procedure is to eliminate or reduce incidents and injuries by providing a framework for procurement, monitoring and review of contractors. The pre-qualification process will help to ensure that contractors meet or exceed the requirements of the Occupational Health and Safety Act, Applicable regulations and J-AAR health, safety and environmental management systems prior to mobilization or starting work.

### DEFINITIONS

**Contractor:**

A contractor who is awarded all or a portion of a contract from the principal contractor

**Subcontractor:**

A company hired by a contractor awarded a contract to engage in construction activities excluding services having no field exposure, visitors, delivering supplies or materials

**Emergency:**

An unexpected or unforeseen time sensitive situation including but not limited to safety sensitive task carried out by specialized contractors, delayed or early critical equipment delivery, shortage of available contractors, schedule change or situation that may delay the project increasing risk of liquidated damages

**Service personnel:**

Delivery, transportation, testing or monitoring companies who are not engaged in construction activities (must be escorted by J-AAR personnel while on the job site)

**Visitor:**


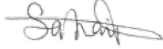
A visitor is a person who does not engage in any type of construction activity while on the jobsite. Visitors

### SCOPE

This procedure applies to all contractors and subcontractors engaged in construction activities or performing work at projects, in facilities or seeking to be added to the approved Contractor List. It does not apply to contractors or subcontractors used in emergency situations.

On multi-contractor or multi-employer sites, coordination, and integration of the OHSMS will be the responsibility the constructor or primary contractor. Contractors and subcontractors are responsible for training and communication as required.

Delivery, transportation, testing or monitoring companies who are not engaged in construction activities, providing a service with no field exposure, emergency contractors and escorted visitors are exempt from pre-qualification requirements, however they must be escorted at all times. If any of the above will be exposed to hazards in the field without a J-AAR escort, they will need to take part in J-AAR's site specific orientation.

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A list of contractors and subcontractors who meet, don't meet, or conditionally meet pre-qualification requirements who will be maintained and used to ensure work is awarded to contractors who have been approved.

### PROCEDURE

#### Prequalification Approval Process

In 2022 J-AAR celebrated its 40<sup>th</sup> Anniversary of doing business in the London area. Throughout those 40 years we have developed a listed of sub-contractors we commonly work with. Subs on this list are almost always used.

Prior to awarding work to a contractor for the first time, contractors/subcontractors will be sent a pre-qualification application to be completed and returned to J-AAR.

A review of the provided information will determine if minimum criteria has been met. Results will be communicated to the project manager, coordinator or designate. Where criteria are met, the contractor will be added to the approved Contractor List.

Contractors/subcontractors not legislatively required to have a Health & Safety, Harassment or Violence in the Workplace policies and procedures must agree to abide by J-AAR policies, practices, and procedures. A letter of agreement will be agreed to and signed. Contractors will be required to resubmit pre-qualification documentation as required to ensure compliance with this process is maintained.

#### Non-Approval

Where the minimum criteria is not met, notification will be sent to the contractor giving them an opportunity to correct deficiencies, provide additional documentation or information. The Health and Safety Team, project manager or designate may be contacted to discuss additional steps required to become qualified. Contractors will not be added to the approved Contractor List until all criteria is met.

#### Selecting a Contractor and awarding work



Prior to being selected, a contractor must be pre-qualified including:

- A positive questionnaire result
- Meeting 100% of all regulatory requirements prior to mobilization

Prior to work being awarded, the project manager or designate will review the Approved Contractor List to determine if the contractor has been pre-qualified and approved.

Where the contractor is on the approved Contractor List, they can be awarded the contract. A Contractor Site Safety Requirement form will be issued to the successful candidate.

#### Evaluation of Contractor submissions

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Project Management or designate will review submissions to determine if requirements are met.

The review will include:

- The employer’s health and safety and violence and harassment policies
- The employers HSMS if any
- Supervisor and worker competency and training
- Hazard identification, assessment, and control procedures
- Safety meetings, workplace, tools, and equipment inspection
- Environmental and spills and waste management program/procedures
- Return-to-work program and procedure
- Safety designations or accreditations such as COR. ISO 45001, Z 1000

### Competency

Contractors must have and maintain required competency, licensing, training, skills and experience to identify, assess and control hazards arising from the scope of work.

When a PO or contract is awarded to a subcontractor, J-AAR will send them the Subcontractor information package. This document outlines in detail everything J-AAR will require from them prior to mobilization.

All training required by the OHSA or regulations must be current and maintained.



To assist contractors with under 5 workers, or who do not have a full HSMS that meets or exceeds the requirements of J-AAR, we will provide copies of policies, safe work practices and procedures applicable to the scope of work. These policies, procedures and practices are a minimum requirement.

All contractors and subcontractors are responsible to review applicable policies, practices, and procedures with their workers prior to mobilizing or starting work and are required to maintain and have training records available for review.

Orientation, including safety policies, site specific safety plans, environmental plans, emergency and rescue plans, site and company rules, rights, duties and responsibilities of the workplace parties, and violence and harassment must be communicated prior to mobilization or start of work.

Failure to train workers may result in progressive discipline up to and including the contractor or contractor’s workers being temporarily or permanently removed from site and removal from the pre-approved Contractor List.

Copies of records required licenses, and certificates must be maintained and available on site by the contractor and available upon request.

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### Risk Identification, Assessment and Control

Contractors are required to carry out risk assessments for planned scope of work activities. Assessments shall include documented hazard identification, assessment of risk and control for all identified hazards. The hierarchy of controls must be applied to methods of control to ensure the lowest possible risk.

In addition, risk assessments must:

- Be completed prior to mobilization or starting work as applicable
- Be carried out on a daily basis for planned activities
- Include identified risks arising from the work to the contractors and other workers
- Include risk to the contractors' workers from other contractors scope of work
- Include hazards impacting the other work groups, visitors, and the public
- Be discussed in an open two-way communication with all affected workers
- Be communicated to other contractors or work groups where hazards affect them
- Be revised if work conditions, schedule or other changes impact the scope of work
- Be available for review

### Reassessment

Where the scope, method or timing of work changes for any reason including schedule, work conditions, weather or contractor activities not previously considered:

- 1) The hazard identification, assessment and controls must be reviewed and revised.
- 2) The competency list must be reviewed and revised.
- 3) Changes must be communicated to involved workers and J-AAR

Communication of change Contractors are responsible to assess and communicate significant changes including scope of work, schedule, working conditions, hazards and risks and controls to:

- The project manager or designate
- All involved workers
- Other work groups and contractors
- Any other person or work group impacted by the change



### Multi-Employer or Multi-Contractor sites

J-AAR, is responsible to:

- Lead coordination and integration of relevant to the HSMS based on scope of work
- Ensure appropriate integration and training requirements are communicated
- Carry out inspection ensuring integration is successful
- Communicate major significant hazard, tasks and safety measures required

Contractors must;

- Identify where their scope of work may impact another contractor
- Identify where another contractor's work may impact their workers.
- Coordinate and communicate with other contractors or employers on site

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- Implement, train and communicate requirements

### Forms

Contractors are required to complete all forms and permits including but not limited to:

- Confined space entry forms
- Complex lock out tag out forms
- Hot work.
- Dewatering Permits (where required)
- Accident, incident, hazard identification and investigation forms

### Monitoring Safety Performance

Compliance audits will be carried out randomly throughout the project and specifically as deemed necessary.

Targeted compliance audits may be conducted where:

- High risk work including critical tasks have been identified
- Blitz activities where patterns of incidents or noncompliance are apparent
- Randomly or otherwise deemed appropriate
- Part of the regular supervisors, JHSC, safety rep or management inspection protocol

Audits used to evaluate contractor compliance may include but are not limited to:

- Meeting requirements of the OHSA, and applicable regulations
- Compliance with safety plans, policies, procedures, and hazard assessments
- Communications protocol and regulatory requirements
- Supervision requirements
- Training and communication requirements
- Supervisors, Safety rep and JHSC inspections
- Housekeeping and environmental requirements

### Noncompliance with Requirements

Contractors not complying with requirements of this policy or who fail to implement corrective and preventive actions after a compliance audit will:



- Be required to make the changes to comply immediately or as agreed
- Be subject to progressive discipline up to and including temporary or permanent removal from site.

In addition, contractors may be placed on a DO NOT USE list until satisfying HSMS requirement prior to being reconsidered.

### Evaluation and Reassessment

Contractors will be periodically re-evaluated and may be required to re-qualify as the result of accident, incident or noncompliance with OHSMS requirements as determined by the safety department, project manager or designate.

Post project evaluations will include:

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- Review contractor overall safety performance and compliance
- Accidents, incidents, and hazard experience
- Proactive hazard reports
- Job safety plans including daily safety plans
- Communications, orientation and training
- Implementation of safe work practices, procedures
- Tools and equipment
- Determining corrective actions or improvements required where necessary
- Determining status including removal or remaining on the approved Contractor List

### RESPONSIBILITIES

#### Senior Management



- Provide resources and commitment to the pre-qualification process
- Support the use of qualified contractors
- Provide feedback and recommendation with regard to this policy
- Review this procedure periodically as required

#### Project Managers/Site-Supervisors

- Provide feedback and recommendation to senior management and the Health and Safety Team
- Lead post job, situational or annual reviews as required
- Review the approved list when seeking pricing and tendering
- Select contractors from the approved contractor list or request a pre-qualification package be sent to the potential contractor
- Ensure pre-qualification or request an information package be sent
- Review this procedure with contractors and the JHSC as required
- Ensure all documentation is complete and submitted to the Health and Safety Team
- Forward pre-qualification packages to the Health and Safety Team for review and approval
- Issue the contractor site requirements form with the contract
- Monitor and report on contractor performance
- Arrange meetings to discuss performance issues with contractors
- Carry out periodic inspections

#### Supervisors

- Provide feedback and recommendation to senior management and Health and Safety Team
- Ensure pre-qualification package is submitted or requested as required
- Ensure contractors are approved prior to signing a contract
- Monitor and report on contractor performance
- Carry out compliance audits
- Participate in contractor post job and annual review as required

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### Workers

- Provide feedback and recommendation with regard to this policy
- Participate in contractor review as required
- Report hazards and difficulty with contractors or subcontractors]
- Provide feedback and recommendation to senior management and Health and Safety Team

### Health and Safety Team



- Provide feedback and recommendation to senior management and Health and Safety Team
- Review and communicate this procedure in consultation with the JHSC
- Send out pre-qualification package to potential contractors
- Assist contractors to understand requirements of the pre-qualification process
- Log progress of pre-qualification packages and follow up as required
- Review returned documentation and approve or reject the submission
- Upon approval, add the contractor to the approved Contractor List
- Maintain an approved Contractor List and send out updates as required
- Participate in annual and post job contractor reviews as required

### Health and Safety Committee/Rep

- Provide feedback and recommendation with regard to this procedure
- Review this procedure periodically as required
- Assist mangers or supervisors with compliance audits as required

### Contractors

- Carry out daily and weekly safety meetings (mandatory for all staff)
- Participate in reviews and audits
- Ensure orientation and training is carried out prior to workers engaging in any work
- Prequalify sub-contractors to ensure regulatory and program requirements are met
- Maintain prequalification, training, and equipment records on site
- Communicate changes to scope, schedule, or previously unidentified hazards
- Investigate all incidents, accidents, and hazard reports
- Report accidents, injuries including corrective/preventive actions within 24 hours
- Carry out and communicate project and daily safety assessments
- Inspect all tools and equipment prior to starting work
- Attend and participate in on site safety meetings
- Provide a worker health and safety representative
- Maintain compliance with OHSA, regulations and HSMS requirements
- Communicate changes to scope of work, schedule, hazard or controls

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### Visitors, delivery, and service personnel

- Are exempt from the prequalification requirements
- Immediately report to the site trailer, office or applicable manager
- Must be escorted at all times

### REVIEW

This procedure will be reviewed and revised as required. Revisions are required when there are changes in business conditions, scope of work, regulatory requirements or when deficiencies become known.

### ENFORCEMENT

Following this procedure is a condition of employment for all employees. This will be enforced strictly by management and supervision. Failure to follow this procedure, as set out, may lead to progressive discipline up to and including dismissal or removal from site as deemed appropriate by J-AAR Excavating.

### DOCUMENT AND RECORD CONTROL

All documents and records generated as part of this procedure will be stored on HCSS/J-AAR's servers indefinitely. Any hard copies generated will be stored at J-AAR's head office for two years after project completion.