

Safety Management Policy

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Objective

This document informs all personnel, including PEL employees and contractors, of the respective procedures that must be followed under the Safety Management Policy.

Scope

PEL Management, supervisors, employees and contractors.

Introduction

PEL has developed a comprehensive PEL Safety Program that identifies responses to various safety and environmental emergencies, as well as establishes company standards and procedures. The Safety Management Policy is the cornerstone around which this program is based. It is our responsibility to ensure that the interests of PEL are protected.

Definitions

PEL	Peter's Expediting Ltd.
Company	PEL
H & S Committee	Health & Safety Committee

Preparation

Hazards

Tools As Needed

Requirements

Elements

1. Application

- The General Manager is responsible for the implementation of the Safety Management Policy.

Person Responsible

General Manager

2. Procedure

- The General Manager will complete the Safety Management Program checklist with all new General Managers as required.
- The General Manager will form an H & S Committee. The committee will include management and all personnel who will work collectively to identify and solve health and safety problems and help to develop ways to mitigate the safety risk and reduce time loss incidents.
- This Committee will operate in an atmosphere of co-operation to ensure that all recommendations and suggestions are given careful consideration.
- Identifies any health or safety concern immediately to the senior personnel on site by the most efficient manner. Staff must not wait until a committee meeting before reporting a hazard/unsafe work condition.
- Personnel will request assistance, giving pertinent details to ensure the safety of other responding personnel.
- Personnel will not prejudice their safety for the safety of company assets.

General Manager

General Manager
All Personnel

3. H & S Committee

- The H & S Committee is responsible for working collectively to find ways to make the workplace safer.
- The Safety Officer for the PEL Facility will Chair the H & S Committee meetings, prepare meeting agendas, call committee meetings a minimum of once a month and follow-up on meeting commitments with all personnel between meetings.
- The General Manager will take the minutes of the H & S Committee meetings and ensure that these minutes are distributed to all personnel for review and action as required.

Person Responsible

General Manager

Safety Officer

General Manager

4.

First Aid

- It is a regulatory requirement to have qualified person(s) on site to provide immediate first aid to an injured worker or customer.
- The General Manager will ensure that a sufficient number of employees are trained to meet this regulatory requirement.
- First Aid training is provided by St. John Ambulance personnel with the assistance of the WCB.
- All training will be documented in the personnel files by the General Manager.

Person Responsible

General Manager

General Manager

5.

Hazard Identification

- The General Manager is responsible for the overall hazard identification program, corrective action and document retention.
- Ensures that the facility is reviewed on a monthly basis utilizing the Facility Inspection Form.
- Ensures that work processes are reviewed with staff on a quarterly basis or prior to the implementation of new processes or the addition of new equipment using the Work Process Hazardous Identification Form.
- Observes staff work practices on a regular basis.
- All hazard documentation shall be filed in a separate binder marked "Hazard Identification and Corrective Action."
- Responsible to take immediate corrective steps to mitigate a hazard when found.
- All hazards must be documented and reported to the General Manager using the Hazard Identification Form.

Person Responsible

General Manager

All Personnel

6. Hazardous Materials

**Person
Responsible**
General
Manager

- Hazardous materials must be respected and handled properly.
- The General Manager will ensure that all employees are trained to handle these materials and will schedule on-going recurrent training as required.
- The training must include training in Workplace Hazardous Information Management System (WHMIS), Transportation of Dangerous Goods (TDG), and others as required.
- All training will be documented in the personnel files by the General Manager.
- Conducts regular workplace inspections to ensure there is no evidence of hazardous materials leakage/container damage.
- Ensures employees follow safe handling procedures/regulations.
- Ensures hazardous materials are stored properly.
- Ensures that labels for TDG and WHMIS are available and are being used by employees as required.
- Ensures MSDS sheets are available and up to date.
- Notifies employees when a new WHMIS controlled product is to be used by staff and to ensure that the MSDS is reviewed by all staff prior to use.
- Ensures that Personnel Protective Equipment (PPE) is available and being worn by employees.

- Asks questions if they are not sure on how to handle a hazardous material.
- Follows all safe handling procedures/regulations. This shall include PEL procedures, IATA TDG regulations, and WHMIS handling procedures.
- Ensures that all hazardous materials are stored properly.
- Inspects hazardous materials to ensure there is no evidence of leakage/damage.
- Knows where the MSDS information can be found and to review the sheets before handling the hazardous material for the first time.
- Labels containers used to decant WHMIS products.
- Wears PPE as required.
- Replaces TDG labels that have been damaged or are missing.
- Reports any damaged/leaking hazardous materials to the General Manager.

7.

Personal Protective Equipment

Person Responsible

General Manager

- Occupational Health and Safety standards require the use of personal protective equipment (PEP) to reduce employees' exposures to hazards when engineering or administrative controls are not feasible or effective in reducing these exposures to acceptable levels.
- The General Manager will determine all exposures to hazards in their workplace and determine if PPE should be used to protect their workers.
- Ensures that appropriate PPE is provided to all employees as required in their work area.
- Ensures employees are trained on the proper use, care and cleaning of PPE.
- Maintains records on PPE assignments and training.
- Supervises the employees to ensure that the PPE Program is followed and that employees properly use and care for PPE.
- Ensures that defective or damaged equipment is immediately replaced.
- PPE must be inspected, cleaned and maintained at regular intervals so that the PPE provides the necessary protection.
- All training will be documented in the personnel files by the General Manager.
- The PPE user is responsible for following the requirements of the PPE Program by wearing the PPE as instructed; attending required training sessions; caring for, cleaning and maintaining PPE as required; and informing the General Manager of the need to repair or replace PPE.
- Seeks assistance from the General Manager to evaluate hazards.
- Notifies the General Manager when new hazards are introduced or when processes are added or changed.

All Personnel

8.

**Airport
Vehicle
Operating
Procedures
(AVOP)**

**Person
Responsible**

General
Manager

- The AVOP's primary purpose is to ensure that the operators of equipment on an airport property have the knowledge and understanding of the rules and regulations governing movement of equipment and aircraft on the airside controlled access areas.
- All airside operators of equipment on airport taxiways and other airport controlled access areas other than the tenant's leased property, must have an AVOP. The AVOP is issued to the operator by the Airport Authority after passing an AVOP operating procedures exam.
- The General Manager will ensure that all employees are trained to meet this regulatory requirement when operating equipment on airport controlled access property.
- All training will be documented in the personnel files by the General Manager.
- It is the responsibility of the employee to operate all company equipment in accordance with the AVOP rules and regulations governing the movement of equipment airside.
- The revoking of an AVOP by the airport authority may result in the employee being dismissed from the company.

All Personnel

9.

**Foreign
Object
Damage
(FOD)**

**Person
Responsible**

General
Manager

- FOD has been part of accidents and unscheduled maintenance reports since the beginning of flight. Propellor nicks, tire damage and other problems with foreign objects such as loose hardware, tools, pavement fragments, building materials, rocks, sand, rags, trash, paper and other such materials can find their way into an aircraft engine or flight control mechanism causing damage that results in anything from minor repairs to catastrophic events.
- The General Manager will ensure that all employees actively participate in airport FOD prevention programs and eliminate FOD in their immediate workplace.

- All employees must practice good housekeeping at all times whether in the facility, on the airport apron or on surrounding roadways at the airport.

All Personnel

10.

Vehicle Preventative Maintenance

Person Responsible

General Manager

- Vehicle inspection and preventative maintenance programs will provide for safe vehicles and extend the service life the equipment.
- The General Manager will ensure that the operators conduct daily inspections of all vehicles prior to operating the equipment or vehicle.
- The General Manager will ensure that preventative maintenance is performed on all equipment or vehicles as per the manufactures service guide.
- The General Manager will ensure that proper inspection and maintenance records are maintained for each piece of equipment or vehicle and that the documentation is readily available for review by the General Manager.
- Conducts an inspection of each vehicle or piece of equipment daily prior to using them.
- Informs the General Manager of any repairs or preventative maintenance that is required as a result of daily inspections so that corrective actions can be taken.

All Personnel

11.

Accident Investigation

Person Responsible

General Manager

- Accident investigations determine causes of accidents, near misses and injuries so that corrective action can be taken to prevent them from happening again. The investigation can also identify other unsafe conditions and unsafe work procedures/practices that require solutions to prevent future accidents.
- An accident is any occurrence that results in loss or damage of any company equipment or property; resulting in loss or damage of any property of others involving the company; resulting in injury or loss of life to a company employee while acting within the scope of employment; or resulting in injury or loss of life to any person other than company employees which involves the company.
- The General Manager will ensure that all accidents are investigated immediately after the occurrence with a written report to be submitted within 24 hours after the occurrence and a verbal report with preliminary findings within 6 hours to the General Manager. Reports will be distributed to the President.
- All injury incidents must be investigated and reported on the approved WCB Workers and Employers report forms in addition to the PEL Accident Investigation Report. Contact the Chief Safety Officer, as well as complete and submit either a Dangerous Occurrence Report form or an Accident Causing Serious Bodily Harm form when required to do so and as soon as reasonably practicable. These reports must be submitted within 3 working days to the WCB office.
- The objective of an accident investigation is to use the findings of the review to develop and implement corrective measures to prevent another incident from occurring.
- The lead investigator will fill out the Investigation Checklist by collecting all facts. From this data, a cause will be determined and recommendations on preventative measures will be reported. The implementation of all recommendations will be followed up and reported back to the General Manager.

- Must report accidents to the senior personnel on site by the most efficient manner.
- Protection and preservation of life will be the primary focus of all responders.

All Personnel

12. Facility Inspection

- The General Manager will ensure that designated employees perform daily inspections using the Warehouse Checklist. The Manager will follow-up on identified hazards or repairs to ensure that corrective action has been taken in a timely period. In addition, the Manager will conduct a monthly inspection using the Monthly Facilities Inspection Report.
- All reports will be kept on file for review by the General Manager.
- All employees will identify any hazards or facility deficiencies to the General Manager as soon as they are aware of these items.

**Person
Responsible**
General
Manager

All Personnel

13. Safety Management System Audits

- To ensure that the system is working and is appropriate, the safety management system must have periodic audits performed the General Manager.
- These audits will be conducted for each facility at a minimum of once each year. The results will be sent to the President on completion.

**Person
Responsible**
General
Manager

14.**Environment****Person Responsible**

General Manager

- During handling, storage disposal and transportation of hazardous materials, there is always the potential for release into the environment. Should this occur, the PEL Emergency Response Policy and the Spill Policy will be followed to ensure proper handling and reporting of the clean-up.
- The General Manager will ensure that all personnel endeavour to reduce and where possible eliminate the impact of their duties on the environment.
- It is this company's policy to work with Government, Industries and our workers to keep the environmental stress down where humanly possible.

15.**Training****Person Responsible**

General Manager

- The General Manager will ensure that all employees are trained in all areas they are required to work. The training shall include work processes and procedures; hazards in the workplace; and all legislative requirements such as WHMIS, First Aid and Transportation of Dangerous Goods as required.
- The following are areas that new employees maybe trained depending on the work to be performed.

Training	Mandatory	Optional
Airline Operating Procedures		Airline cargo employees
First Aid		Sufficient to ensure one qualified person on each shift
Forklift Operations		Operators Only
Hazard Identification	All	
Incident and Accident Investigation		General Manager and all other Supervisors (Leads)
Health & Safety Committees		General Manager and all other Supervisors (Leads)
Safety Management Policy		General Manager and all other Supervisors (Leads)
Transportation of Dangerous Goods	All	
Vehicle Operations		Operators Only
WHMIS	All	
AVOP		Operators Only

16.**Recurrent Training****Person Responsible**

General Manager

- The General Manager will ensure that all employees have recurrent training including work processes and procedures; hazards in the workplace; and all legislative requirements such as WHMIS, First Aid and Transportation of Dangerous Goods as required.
- The following are areas that employees may have recurrent training depending on the work to be performed.

Training	Recurrent Training	Training Provider
Airline Operating Procedures	As required by specific carrier	As required by specific carrier
First Aid	Yearly	St. John Ambulance
Forklift Operations	Yearly	PEL In-house
Hazard Identification	Yearly	PEL In-house
Transportation of Dangerous Goods	Yearly	Airlines/PEL Approved Program
Vehicle Operations	Yearly	PEL In-house
AVOP	Yearly	Airport Authority Exam

17.**Records/
Reports****Person Responsible**

General Manager

- The General Manager will ensure that records/reports are kept up to date, segregated into separate subject files and stored in a safe place in accordance with the following retention cycle:

Records/Reports	Recurrent Training
Accident Investigations	3 Years
AVOP Certification	Permanently in employee personnel file
Daily Facility Inspection Reports	1 Year
Monthly Facility Inspection Reports	2 Years
Hazard Identification Reports	3 Years
Daily Vehicle Inspection Reports	1 Year
Transportation of Dangerous Goods Documentation	3 Years
H & S Committee Minutes	2 Years
WCB Reports	3 Years
WHMIS MSDS sheets	3 Years – MSDSs must be renewed after 3 Years. Note: the MSDS sheets must be available at all times to employees and should be filed into a binder.
Training	Permanently in employee personnel file

Documents and Records

- Related Documents:
 - Emergency Response Policy (PEL)
 - Spill Response Policy (PEL)
 - PEL Safety Program (PEL)
- Related Records:
 - Safety Management Program Checklist Form (PEL)
 - Monthly Facility Inspection Form (PEL)
 - Hazard Identification Form (PEL)
 - Work Process Hazard Identification Form (PEL)
 - Daily Vehicle Inspection Form (PEL)
 - Vehicle/Equipment Maintenance Record Form (PEL)
 - Accident Inspection Report Form (PEL)
 - WCB Workers and Employers Report Form (WCB)
 - Accident Investigation Checklist Form (PEL)
 - Daily Warehouse Inspection Checklist Form (PEL)
 - Safety Management System Audit Form (PEL)
 - Employee Training Record Form (PEL)