



Policies and Regulations

PO-004

Occupational Health and Safety Policy

April 2020

Preamble and Scope

SIRIUSMEDx is committed to the safety of its employees. It is in this sense that it wishes to implement an occupational health and safety policy to reduce the risks associated with occupational illnesses and accidents. Consequently, since occupational health and safety affects all employees and collaborators, everyone will have a role to play to ensure the success of the various programs resulting from this policy.

This policy applies to all SIRIUSMEDx members. Responsibility for this policy is entrusted to the Chief Administrative Officer.

This policy is based on certain guiding principles, as is :

Prevention	Establish a culture of risk management through the application of mechanisms to achieve quantifiable and measurable objectives.
Accountability	Inform, equip, train and support the various players in the company with the objective of adopting safe behaviours and ways of doing things while respecting the environment.
Reasonable Diligence	Take the necessary measures to avoid occupational injuries and/or illnesses within the company by respecting its duties of foresight, efficiency and authority.
Continuous Improvement	Be proactive in implementing and maintaining health and safety management activities.

Definitions

Work-related injury

An unforeseen and sudden event, attributable to any cause, occurring to a person by the fact or in the course of his or her work and resulting in an employment injury to that person¹

Customer

A customer is an individual or legal entity having a business relationship with the SIRIUSMEDx company. This person, in the application of this policy, is at the same time a participant in a course, a patient in the context of a medical support project or a person benefiting from the company's services.

Reasonable Diligence

This refers to the degree of judgment, care, prudence, firmness and action that can reasonably be expected of a person in certain circumstances².

Accident Form

A number of official documents that describe the actions of one or more persons as a result of events such as: an accident resulting in injury or damage, an infraction of a law or regulation, a criminal act, etc.³

Risk Management

All activities that consist of identifying the risks to which the entity is exposed and then defining and implementing appropriate preventive measures to eliminate or mitigate the consequences of a risk⁴

Manager

For the purposes of this policy, a manager is a person in a supervisory, managerial or advisory role who has a reporting relationship to employees or who has the ability to represent the organization.

¹ <http://legisquebec.gouv.qc.ca/fr/ShowDoc/cs/A-3.001>

² <https://www.cchst.ca/oshanswers/legisl/diligence.html>

³ https://www.ccdmd.qc.ca/media/Genres_06Lerapportdintervention.pdf

⁴ https://www.oqlf.gouv.qc.ca/ressources/bibliotheque/dictionnaires/terminologie_risque/gestion_risque.html

Incident	A fact, secondary event, usually unfortunate event that occurs during an action and may disrupt the normal course of the action. Can also be defined as an event that may have caused injury or damage. ⁵
Instructor	An individual mandated by the company as a self-employed worker to provide training certified by the company.
Occupational injury	An injury or illness that occurs as a result of or during a work-related accident, or an occupational disease, including recurrence, relapse or aggravation ⁶
Occupational disease	An illness contracted by or during work and which is characteristic of that work or directly related to the particular risks of that work ⁷
Dangerous Goods	A material that, because of its properties, constitutes a danger to the health, safety or physical integrity of a worker, including a hazardous product ⁸
Well-Being	A state related to various factors considered separately or jointly (e.g., health, social or economic success, pleasure, self-actualization, harmony with oneself and with others, etc.). ⁹
Medical support Staff	Medical support staff includes every employee working for the company and performing clinical functions on one of the projects. These employees may be, without restricting the scope, a first responder, a first aid worker, a paramedic, a nurse, a doctor, etc.

⁵ <https://www.larousse.fr/dictionnaires/francais/incident/42245>

⁶ <http://legisquebec.gouv.qc.ca/fr/ShowDoc/cs/A-3.001>

⁷ <http://legisquebec.gouv.qc.ca/fr/ShowDoc/cs/A-3.001>

⁸ <http://legisquebec.gouv.qc.ca/fr/ShowDoc/cs/S-2.1>

⁹ <https://fr.wikipedia.org/wiki/Bien-être>

Prevention Program

This is a prevention action plan specific to each establishment. It is the main prevention tool provided for by law. It aims to eliminate, or control, workplace hazards and includes concrete measures to do so. It is developed by the employer, with the participation of workers. It allows employers to ensure the health and safety of their employees¹⁰

Incident Register:

The accident register is a document in which the employer must record work accidents and near-misses that occur in his establishment. It is therefore one of the main indicators of your workplace's occupational health and safety situation.¹¹

Health

A state of complete physical, mental and social well-being, and not merely the absence of disease or infirmity¹²

Subcontractor:

This is a natural or legal person who carries out work entrusted by the company.

Objectives

The objective of this policy is to provide a safe working environment for clients, instructors, medical support staff and managers by ensuring their health, safety and physical integrity. The participation of all members of the organization is put forward to ensure the respect and success of this policy.

¹⁰ <https://www.csst.qc.ca/prevention/risques/Pages/prevention.aspx>

¹¹ <https://formationsst.csn.info/registre-daccidents/quest-ce-quun-registre-daccidents/>

¹² [https://fr.wikipedia.org/wiki/Santé](https://fr.wikipedia.org/wiki/Sant%C3%A9)

Cadre légal et réglementaire

- ✓ Charter of Human rights and Freedoms, *R.L.R.Q. chapitre C-12*

Art. 46 Every person who works has a right, in accordance with the law, to fair and reasonable conditions of employment which have proper regard for his health, safety and physical well-being.

- ✓ Civil Code of Quebec, *R.L.R.Q. chapitre CCQ-1991*

Art. 2087 The employer is bound not only to allow the performance of the work agreed upon and to pay the remuneration fixed, but also to take any measures consistent with the nature of the work to protect the health, safety and dignity of the employee.

- ✓ Act respecting Occupational Health and Safety, *R.L.R.Q. chapitre S-2.1*

Art. 3 The fact that collective or individual means of protection or safety equipment are put at the disposal of workers where necessary to meet their special needs must in no way reduce the effort expended to eliminate, at the source, dangers to the health, safety and physical well-being of workers.

Art. 49.1 A worker must not perform his work if his condition represents a risk to his health, safety or physical well-being or that of other persons at or near the workplace by reason, in particular, of his being impaired by alcohol, drugs, including cannabis, or any similar substance.

Art. 51 Every employer must take the necessary measures to protect the health and ensure the safety and physical well-being of his worker. [...]

Art. 51.1 A person who, although not an employer, retains the services of a worker for the purposes of his establishment must fulfill the obligations imposed on an employer by this Act.

Responsibilities of the company

- ❖ To provide a safe work environment for all employees, instructors and collaborators by reducing risks as much as possible;
- ❖ To offer the appropriate personal protective equipment according to the identified risks;
- ❖ Offer tools and work equipment in good condition and respecting maintenance programs;
- ❖ Ensure the application of this policy;
- ❖ Ensure that employees, instructors and collaborators have read and understand this policy;
- ❖ Ensure the processing and follow-up of all incident reports or declarations;
- ❖ Investigate all accidents and occupational disease situations;
- ❖ Collaborate with government representatives in the application of various laws and regulations;
- ❖ Promote the mobilization of all the actors of the company in a risk prevention process.

Responsibilities of the employee or instructor

- ✓ Become familiar with and understand the various programs and this policy;
- ✓ Take the necessary measures to ensure his or her health, safety and physical/psychological integrity as well as that of others;
- ✓ Adopt safe behaviours;
- ✓ Dress or wear the required personal protective equipment or refrain from performing tasks or gaining access to areas where the wearing of equipment is necessary;
- ✓ Participate in the identification and elimination of risks of occupational accidents and diseases. Employees and instructors may use the methods provided by the employer to identify, control and eliminate risks that may affect the health and safety of persons;
- ✓ Report to the responsible manager any emergency or hazardous situation that has caused or is likely to cause an accident, incident or occupational disease and collaborate in finding solutions;
- ✓ Issue a request for any adjustments that may be required in terms of health and safety;
- ✓ Assists in the investigation and analysis of an accident, incident or occupational disease;

- ✓ Completes, when the situation requires it, an incident report, accident report or any other related form before leaving the scene of the event;
- ✓ Cooperate in good faith in investigations as required by law;
- ✓ Submit to health examinations required for the application of the Occupational Health and Safety Act at the request of the employer.

Prevention Program

The objective of a prevention program is to improve and maintain the safety of the organization's workers and employees. This objective can be achieved through the implementation of an action plan that includes: the collection of data on risks and the implementation of preventive safety measures.

Data collection must be carried out by gathering information from various sources in order to adequately identify risks and potential hazards that could jeopardize the safety of workers, employees and customers. The process must be able to respect confidentiality and allow the data to be compiled and reported. Based on this report, which will collate the various information/data received, an action plan can be put in place to promote accident prevention.

Health and Well-being Program

The objective of a health and wellness program is to improve and maintain the health of the organization's employees and collaborators. This objective can be achieved through the implementation of an action plan that includes: collecting data on risks, interests and concerns in order to implement an action plan. This action plan must be able to reflect the various information gathered in a confidential manner and allow for concrete actions to be taken to improve the well-being and reduce the health risks of employees, collaborators and clients.