

# HEALTH AND SAFETY POLICY

(Addendum for Canada)

Where the term “employee” is used in this policy it applies to any part-time, full-time, casual or temporary employee of LUXOTTICA as well as any individual who would be considered a “worker” for the purpose of the Occupational Health and Safety Act (“OHSA”).

LUXOTTICA is committed to providing a safe and healthy working environment.

Every employee is required to observe and comply with the requirements of the OHSA and regulations and is expected to work safely.

Management of the Company is committed to protecting the health and safety of every employee in the workplace and to identifying and addressing health and safety concerns as quickly as possible.

A Joint Occupational Health and Safety Committee (the “JHSC”) shall be established to assist in the implementation and management of this Policy. The JHSC shall be comprised of a minimum of two (2) persons. Locations with more than 20 employees should have four (4) persons. At least half of the JHSC members must be employees who do not exercise management functions. At any given time at least one (1) representative must be a representative of management. The composition of the JHSC will be posted in the EMPLOYEE BREAK ROOM.

Locations with more than 20 employees must have at least one management-level member and one employee-level member of the JHSC shall receive training in Occupational Health and Safety and be certified.

The JHSC shall meet at least every three (3) months. Each meeting shall be co-chaired by two members, one representing management and one representing employees. Minutes of the meeting must be recorded and retained.

## Responsibility for Health and Safety

### *JHSC Responsibilities*

The JHSC shall ensure:

- This Policy is:
  - Compliant with statutory requirements.
  - Posted in a prominent location.
  - Effectively communicated to each employee.
  - Reviewed annually and revised as necessary.
- A workplace violence risk assessment is conducted and reassessed thereafter as necessary.
- An appropriate program is developed, implemented and maintained in accordance with the OHSA to implement this Policy.
- A workplace safety inspection is carried out monthly and safe and healthy work conditions are promoted and maintained.
- Each employee is informed of this Policy and receives training to enable him or her to perform work in compliance with accepted safe work practices and procedures.
- Each employee is notified of any potential hazard that may exist in or around the workplace, including any land, premise, location or thing at, upon, in or near which the employee works.
- Appropriate recommendations are made for the improvement of the health and safety in the workplace.

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## *Management Responsibilities*

Management shall ensure:

- This Policy is reviewed at least once a year and an implementation program is in place.
- The workplace is in compliance with statutory and regulatory obligations.
- Every workplace facility is adequately maintained and any hazard is identified and corrected.
- A copy of the OHS Act and all explanatory material outlining the rights, responsibilities and duties of every employee is posted in the workplace.
- Sufficient support, resources and funding are provided to enable the JHSC to carry out its responsibilities.
- The Company cooperates with the JHSC to enable it to carry out its responsibilities, which may require the Company to:
  - Provide the JHSC with any information the JHSC has the power to obtain from the Company in accordance with the OHS Act or other applicable legislation.
  - Respond to any recommendations of the JHSC.
  - Provide the JHSC with copies of all orders and reports issued by the Ministry of Labour and the result of any workplace violence risk assessment.
- The names of JHSC members are posted in the EMPLOYEE BREAK ROOM.
- Appropriate authorities are notified and reports are submitted pursuant to statutory reporting requirements.
- Assistance is provided in the event of a medical emergency.
- Any accident, injury, or workplace violence report is reviewed and, where appropriate, investigated.
- Any workplace harassment complaint or incident is investigated in a manner appropriate to the circumstances.
- Any workplace death, injury or illness is reported to the JHSC. Any work refusal is investigated.
- Any order by an inspector requiring the Company to retain a neutral party to conduct a workplace harassment investigation is complied with.

## *Supervisor Responsibilities*

Each supervisor shall:

- Ensure each employee works safely and in compliance with accepted work practices, procedures and legislated health and safety standards.
- Ensure each employee uses or wears the equipment, protective devices or clothing the Company requires be used or worn and does so in compliance with the OHS Act and its regulations.
- Advise an employee of the existence of any potential or actual danger to the health or safety of the employee of which the supervisor is aware.
- Take every precaution reasonable in the circumstances for the protection of an employee.

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## *Employee Responsibilities*

Each employee shall:

- Apply consistent and continuous effort to prevent any workplace accident and maintain the workplace in a safe condition.
- Work safely and in compliance with accepted work practices, procedures and legislated health and safety standards.
- Follow the requirements set out in this Policy. Maintain a tidy work area, free of any hazard.
- Report any known contravention of the OHSA or regulations.
- Report any hazard or unsafe condition to Management after taking appropriate immediate action.
- Report every accident, injury or incident of workplace violence or harassment in accordance with this Policy.

An employee who fails to observe Policy or who violates established workplace safety requirements may be subject to disciplinary action, up to and including the termination of employment for cause.

## **Accident and Injury Reporting and Investigation**

### *Reporting*

Each employee is responsible for immediately reporting a workplace injury, accident or illness to management, including injury resulting from workplace violence. At a minimum and in every case, accident and/or injury reporting shall comply with all legislated requirements.

Management is responsible for:

- Ensuring an accident or workplace injury is investigated.
- Ensuring that the appropriate accident or injury report is properly prepared following the accident or injury and issued in a timely manner to the appropriate authorities consistent with statutory and regulatory reporting requirements and for ensuring every employee is familiar with this Policy and any related forms.
- Ensuring every reasonable step is taken to minimize the possibility of a recurrence of the accident or injury.

In the event of a fatality or critical injury of an employee, or visitor or other person at the workplace, management shall ensure that:

- The accident scene is sealed off immediately and nothing within the scene is disturbed except for the purpose of saving life, relieving human suffering, or preventing unnecessary damage to equipment or other property until the scene is released by the Ministry of Labour.
- The following persons are notified within the time period shown and in the manner set out opposite their title:
  - Ministry of Labour Safety Inspector – immediately by telephone, facsimile or other direct means.
  - JHSC – immediately by telephone, facsimile, electronic communication or other direct means.
  - [UFCW Local 1006A Trade Union Representative- immediately by telephone, facsimile, electronic communication or other direct means.]
  - Ministry of Labour Safety Director — within forty-eight (48) hours after the

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occurrence by written report in the manner prescribed by the OHSA.

“Critical injury” means an injury of a serious nature that:

- Places life in jeopardy.
- Produces unconsciousness.
- Results in substantial loss of blood.
- Involves the fracture of a leg or arm but not a finger or toe.
- Involves the amputation of a leg, arm, hand or foot but not a finger or toe. Consists of burns to a major portion of the body.
- Causes the loss of sight in an eye.

In the event of a workplace accident, explosion, fire or incident of workplace violence where an employee, visitor or other person is disabled or requires medical attention, and there is no critical injury, the following shall be notified in writing within the time period shown and in the manner set out opposite their title:

- Ministry of Labour Safety Director — if required by an Inspector, within four (4) days of the occurrence; in writing, containing such information and particulars as are prescribed;
- UFCW Local 1006A Trade Union Representative - within four (4) days of the occurrence; in writing, containing such information and particulars as are prescribed.
- JHSC – within four (4) days of the occurrence; in writing, containing such information and particulars as are prescribed.

If the Company is advised by or on behalf of an employee or former employee, that the employee or former employee has an occupational illness or that a claim in respect of an occupational illness has been filed with the WSIB by or on behalf of the employee or former employee, the following shall be notified within four (4) days of first learning of the occupational illness or claim for occupational illness; in writing, containing such information and particulars as are prescribed:

- Ministry of Labour Safety Director
- Joint Health and Safety Committee

## *Investigation*

Every workplace accident or incident resulting in death or critical injury or that could have caused death or critical injury or significant property/equipment loss (a “near-miss”) must be investigated immediately.

Every accident not resulting in death or critical injury is subject to internal investigation in order to reduce the risk of a future occurrence of a similar nature. The JHSC may also conduct an investigation.

Management shall retain a copy of every accident or incident report made to the Ministry of Labour (or any other regulatory authority) and every investigation report under this Policy for at least seven (7) years, or until it is apparent no legal action or regulatory investigation will ensue, whichever is longer.

Management shall maintain a list of every recommendation and its respective completion date from each accident investigation and shall follow-up, as necessary, to ensure compliance.

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## *Emergency Response and First Aid*

Emergency response procedures and contact information are set out in employee break room. A first aid kit is located in the First Aid Station. The First Aid Station is located inside of the lab. A employee is to notify management when supplies are used and need to be replenished. Management or a member of the JHSC, so designated, shall inspect first aid kits quarterly to ensure adequate first aid supplies are available in first aid kits.

## **WHMIS**

Every employee shall take care and precaution when handling consumer material containing hazardous material.

Any employee with a question or concern about hazardous material in the workplace, or any labeling of consumer material, should raise it with a member of management.

Any purchase or use of non-consumer hazardous material shall be approved by management prior to purchase, who shall ensure:

- Appropriate labelling, Material Safety Data Sheets and proactive clothing or equipment necessary for handling of all non-consumer hazardous material (i.e., subject to WHMIS) is obtained and made available to any employee as appropriate prior to accepting delivery of the material.
- Any employee exposed to or required to use hazardous material receives WHMIS training prior to use or exposure to hazardous material.

Any training program related to WHMIS is reviewed on an annual basis.

## **Training and Education**

The Company will provide information and training to every employee regarding this Policy.