

(Company Name)
CORPORATE SAFETY AND HEALTH PROGRAM

(Company Name)
(Address)
(Phone Number)

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LOSS CONTROL POLICY STATEMENT

The management of (Company Name) is committed to providing employees with a safe and healthful workplace. It is the policy of (Company Name) that employees report unsafe conditions and do not perform tasks if the work is considered unsafe. Employees must report all accidents, injuries, and unsafe conditions to their supervisors. No such report will result in retaliation, penalty, or other disincentive.

Employee recommendations to improve safety and health conditions will be given thorough consideration by our management team. Management will give top priority to and provide financial resources for the correction of unsafe conditions. Similarly, management will take disciplinary action against employees who willfully or repeatedly violate workplace safety rules. This action may include verbal or written reprimands and may ultimately result in termination of employment.

The primary responsibility for the coordination, implementation, and maintenance of our workplace safety has been assigned to:

Name: (Employee Name)

Title: (Employee Title)

Telephone: (Phone Number)

Senior management will be actively involved with employees in establishing and maintaining an effective safety program. Our safety program coordinator or other members of the management team will participate in ongoing safety and health program activities, which include:

- Promoting health and safety and committee participation;
- Providing safety and health education and training; and
- Reviewing and updating workplace health and safety rules.

This policy statement serves to express management's commitment to and involvement in providing our employees a safe and healthful workplace. This workplace Safety Program will be incorporated as the standard of practice for (Company Name). Compliance of all safety rules will be required of all employees as a condition of employment.

Signature

Date

HIRING AND INDOCTRINATION OF EMPLOYEES

Application Form

Each prospective employee must complete the Application for Employment as the first step to securing a position. The form is our application and should be completed before any further steps are taken. This form becomes part of the employee's permanent file. Application forms of people not hired should be kept in a separate folder so marked. A folder should be maintained of applications of all those now being considered, or with the possibility of being considered, for employment in the future.

Reference Checks

If a person is being considered for employment, at least three reference checks must be made. These should include a previous employer, a personal reference check and one other. The checks can be made in writing or via telephone. If any reference provides information for not hiring the person, the reference should be asked to give that in writing.

Motor Vehicle Checks

Any person hired to drive a Company vehicle must provide his driver's license number and a copy of his driver's license. We will then contact the local DMV and obtain a copy of that person's driving record. A photocopy of the license and a copy of the driving record will become part of the employee file.

Drug Screens

All employees must submit to random and pre-placement drug testing. Any positive result will be reason for immediate dismissal and referral to rehabilitation as available. Each employee will be required to sign the release which gives us consent to drug test and explains the results of violation of our policy, which is "Any employee testing positive for any controlled dangerous substance through our random drug testing program will be immediately dismissed and referred for rehabilitation and counseling". These tests may also be for alcohol, especially if the employee drives a Company vehicle or is involved with the public in the job.

Pre-Job Physicals

A full physical may be required pre-placement. This physical will include back x-ray. The results of the physical will be used in determining placement of the employee. Base line audiograms will be done for any employee exposed to high-level noises. Back to work physicals will be done for any employee that has been off work for over two weeks for an illness or work related injury.

Criminal Records

Any employee involved in handling money or products in their normal job shall provide us with permission to run a criminal record check through the local police departments. Any adverse findings will be reason for dismissal. Any employee found to be illegally taking valuables from our Company or customers will be terminated and criminal charges will be filed against him/her.

On Job Observation

When an employee has been hired by management and placed in a position, the manager will be responsible for observing that employee closely for the first month. At the end of each week, he will give oral reports to top management on the performance of the new employee, positive or negative.

Orientation and Indoctrination

New employees, before reporting for duty, will be given a thorough indoctrination. They will be given copies of this Safety Manual, Employee Manual, Hazard Communication Program, Lockout Program, and required to read all of them. They will be instructed in our basic rules and regulations and in their specific job duties. The employee will be given the opportunity to ask questions at this time. Any safety materials and equipment will be given to the employee and he will be trained in its use at this time.

Annual Follow-up

At each employee's anniversary date, or near this date, an annual review of the employee's performance will be done. At this time, review of the employee file should be done. A review of training, accidents, violations, rewards, and any other pertinent information will be made to determine if any discipline, merit increase, or other action is necessary.

Americans With Disabilities Act

All prospective employees will be treated equally regardless of physical or mental condition, race or nationality, or religious affiliation. We will strive to comply will all applicable federal standards of the ADA and other fair labor standards and laws.

DRUG, ALCOHOL AND CONTRABAND POLICY

I understand the Drug, Alcohol and Contraband testing policy. I understand that to continue to be an employee here, I will have random drug and alcohol testing. I will voluntarily submit to drug and/or alcohol testing as per this Company's policies. I consent to the release of the test results under the conditions of this policy. I also understand that any positive results of these tests will be a violation of this policy and reason for immediate dismissal.

Employee signature

Date

Company representative signature

Date

CRIMINAL RECORD CONSENT

I hereby give my full consent to obtain any of my available criminal records. I understand that this consent is a condition of my employment here and that refusal to give consent is reason for immediate dismissal. I also understand that any findings not in compliance with this Company's policies will be reason for dismissal.

Employee signature

Date

Employee Social Security Number

Employee Driver's License Number/State

Company representative signature

Date

ALCOHOL AND SUBSTANCE ABUSE POLICY

This policy is applicable to any and all employees at all locations.

We are committed to maintaining a safe workplace and a drug and alcohol free environment without infringing upon the rights of any employee. We are aware that being under the influence of alcohol or any controlled dangerous substance will greatly impair the employee's ability to safely carry out the duties of his position. Consequently, being under the influence of or using, possessing, distributing or selling alcohol, illicit or unprescribed controlled substances or paraphernalia, or misusing legitimate drugs on property owned or being worked at by our Company or on property of any other company with whom we have contracted, is strictly prohibited.

To assure that our employees remain alcohol free and drug free, we will maintain documentation that demonstrates that each employee is alcohol and drug free. This documentation will be obtained by random drug and alcohol testing of all employees as per applicable State substance abuse laws and the Federal Drug Free Workplace Act of 1988.

Drug/alcohol testing will be required in the following instances:

- 1) For any new applicant.
- 2) For present employees on a true random basis, with 50% being tested annually.
- 3) For cause, which includes supervisor or manager observance of slurred speech, lack of coordination, lack of control of motor functions, absenteeism, tardiness, lack of judgment, or any unsafe act that causes injury or damage to property.
- 4) Post accident for employee injury or fleet loss.

Employees using prescription medication or over-the-counter medication that will affect their performance shall report this to their supervisor immediately.

Employees will allow our management team or our assigned authority to conduct unannounced searches for contraband and drugs. This may include the use of police and police dogs.

GENERAL SAFETY RULES AND REGULATIONS

SPECIFIC RULES AND DUTIES OF ALL EMPLOYEES

Reporting Unsafe Conditions

It is the responsibility of every employee to report immediately to his/her supervisor the following unsafe conditions:

- 1) Equipment, motor vehicles, plant or property owned, leased or operated when the condition may put the safety of an employee, other employees, or the public in danger.
- 2) Any operation or practice being carried out when such an operation or practice may cause harm to the safety of the employee, other employees, or the public.
- 3) Any operation or practice being carried out by others that may jeopardize the safety of an employee performing his/her duties.

Any unsafe conditions are to be reported to your supervisor immediately. If you feel that corrective action is not being taken, then you should notify, in writing, the upper management.

Observe Rules and Regulations

Managers and supervisors shall make certain that employees observe and obey every rule, regulation, and order necessary to conduct safe working conditions, and shall take the appropriate action to assure compliance. Failure on the part of the employee to adhere to our safety policies will result in disciplinary action or termination of employment.

Accident Reports

Only those accidents arising out of and in the course of employment are covered by Workers' Compensation insurance.

Every personal injury and "near miss" must be reported to management. The standard procedures are as follows:

- 1) Supervisor on the job will fully notify the manager immediately about any incident, with details.
- 2) Supervisor on the job will fully complete, for any personal injury, a "First Report of Injury" to be given to management within 24 hours of the injury.
- 3) Managers will investigate all incidents and accidents.
- 4) The managers and all witnesses will write a complete summary of accidents and incidents leading up to the accident, sign it, and turn it in before the end of the day.
- 5) The injured person's written statement will be completed within 24 hours, or as soon as possible.
- 6) A full investigation with a report on recommendations should be completed within seven (7) days from the time of the incident.
- 7) Any "near miss" incident must be handled as any accident or personal injury except that

step 2 above is not required.

Any employee involved in or at the scene of an accident shall **NOT** accept any responsibility or blame or discuss with anyone the details of the incident, except with his supervisor or a representative of his supervisor, the insurers, or proper governmental authority. It shall be the responsibility of the supervisor or manager to conduct communications with others.

Medical Facilities

Medical facilities will be available for all injured workers. CPR and first response personnel will be available at all sites at all times, either within the Company or from nearby medical facilities. The location, address, and telephone numbers of available emergency personnel will be posted at every work site.

Safety Meetings

Safety meetings shall be held at each location at least monthly, and more often if deemed necessary. Annual formal training will be incorporated into our safety meeting program.

Horseplay

Horseplay, scuffling, and other acts which tend to have an adverse influence on the safety or well being of the employees are prohibited.

Alertness

No employee shall knowingly be permitted to work while his/her ability is so impaired by fatigue, illness, or other causes that it might unnecessarily expose him/her or others to injury. It is the responsibility of the managers on the job to determine that all employees are both mentally and physically fit to perform expected duties.

Alcohol, Drugs

No employee at any location at any time shall consume, be under the influence of, or have in his system, any amount of alcoholic beverages or any controlled dangerous substance. If any employee is on prescription medications or any over-the-counter medications that affect alertness or general condition, the employee is responsible for reporting this to his manager. If needed, changes in work schedule or duties will be made to accommodate this.

Removing Materials From Locations

We will consider it theft if any employee removes from any location any office supplies, food items or other materials owned by this Company. We will prosecute theft to the fullest extent of the law.

Good Housekeeping

Good housekeeping is the first duty of all employees and is necessary for a safe workplace.

- 1) All tripping hazards must be corrected before work begins.
- 2) No job is complete until all tools and materials are cleaned up and returned to their proper places and the work area is properly cleaned.
- 3) Materials and tools shall be kept in an orderly manner, as they are a hazard when left scattered around the work area.
- 4) Accumulations of any combustible materials, such as oil, fuel or creosote soaked cloths, rags, waste, etc., should be placed in metal containers provided for this purpose.

Hazardous Conditions

It is the responsibility of every employee to assist in the detection and reporting of unsafe conditions. All hazards must be reported to your manager and eliminated as soon as possible. Hazards must be communicated to other employees.

If a work area has a hazard that presents imminent serious danger, all work must be stopped immediately until the condition is brought under control.

Moving, Rotating Machinery

Stop all moving, rotating machinery when cleaning, oiling, repairing, or adjusting as per our Lock-Out/Tag-Out Program, which is included as a part of this corporate Safety Program.

Mechanical Guards

All moving machinery that presents a hazard to employees in its proximity must be adequately guarded. Any removed guard must be replaced before the machinery is returned to operations.

Smoking

Smoking is permitted only in designated safe areas at each location.

Jewelry

Jewelry is permitted to be worn only when it does not present a hazard to the employee. Any employee operating moving or rotating machinery shall not wear rings or bracelets. No jewelry that is offensive to other employees will be tolerated.

Hard Hats

Hard hats are required when working within any industrial plant location or at any other location where the wearing of a hard hat is required.

Hair

Hair that is longer than collar length should be tucked in under hard hats when the wearing of a hard hat is required. We consider all of our employees professionals and expect them to present themselves in a professional manner as pertains to appearance, hair, and jewelry when working with the public and around our customers.

Eye and Face Protection

When required, safety glasses are to be used. All safety glasses must have permanently attached side shields.

Noise Protection

We will adhere to OSHA regulations on noise exposure.

Vehicle Regulations

- 1) Any person operating a Company vehicle will have a valid driver's license and will demonstrate his/her ability to operate that vehicle safely.
- 2) Any employee operating a truck with gross weight over 26,000 pounds is required to have a CDL and comply with the requirements of that license.
- 3) Drivers must observe and adhere to all posted speed limits.
- 4) Personnel will not board or exit a moving vehicle.
- 5) Keys are to be removed from a vehicle every time the operator is not in the vehicle.
- 6) Everyone riding inside a Company vehicle must wear a safety belt.
- 7) A fire extinguisher shall be standard equipment on all vehicles.

Foot Protection

Whenever any employee is working in an industrial environment that requires special foot protection, that employee shall wear approved steel-toed boots or shoes.

General

All employees must follow all safety rules at all times, whether those rules were communicated to the employee in writing or orally. When any employee is at a location other than our office building, that employee shall follow all the safety rules of that location. It shall be the responsibility of the employee to determine if any special safety rules apply where he is working.

DUTIES AND RESPONSIBILITIES

Responsibility for loss control is established at each personnel level of the organization: executive, management, supervisory and employee.

Role of the Executive

Executive leadership is paramount to the success of the loss control program. The role of all corporate office executives, whether by direct order or by committee, includes the following functions:

- 1) Issuance of a formal policy and standards for employee safety and health. The formal Safety Manual should complete this function and provide for the formulation and implementation of self-inspection forms, accident investigation forms, safety meeting agendas and sign in sheets, and general safety rules.
- 2) Protection of the Company's assets, including personnel and property, by complying with the OSHA directive of providing a safe place to work.
- 3) Commitment to a safe product and/or service. The corporate office management is very dedicated and committed to providing our customers with the best service possible whether in vending, grounds maintenance, or industrial work.

These responsibilities relate both directly and indirectly to those of the manager.

Role of the Manager

The ability of the managers of the various departments to manage their loss control responsibilities is a major factor in measuring the effectiveness of the overall program. The role of each manager is similar, whether it is on the corporate, television, radio, grounds maintenance, sales or other work level.

The manager's responsibilities include:

- 1) Implementation and maintenance of safety and health policies and standards. Each manager will implement the safety policies herein and enforce the rules stated within the scope of this program.
- 2) Providing a hazard-free or hazard-controlled work environment for all employees. Managers will provide a safe work environment and the necessary safety equipment to complete each job within their management.
- 3) Maintaining equipment in proper condition and ensuring that employees are well trained in maintaining all equipment, whether it is a vehicle, office equipment or media type equipment.
- 4) Keeping abreast of accident trends and taking proper corrective action to reverse those trends. The manager must review all losses as they occur, as well as annually, to develop trends. Managers will implement corrective action as determined in the accident investigation.
- 5) Investigating all accidents within each jurisdiction, whether serious or not. Any recordable accident or preventable equipment accident will be investigated.
- 6) Enforcing all hazard control rules, regulations and procedures through self-inspections and doing job safety analysis.
- 7) Actively supporting instruction and training sessions for both supervisors and employees and scheduling annual or more frequent training as per OSHA and other regulatory requirements.
- 8) Actively participating in safety committee activities and following up on recommendations. Managers will follow up on suggestions from supervisors and executive management, attend safety meetings, attend training, and be a safety support person for all employees.

Role of Supervisors

Supervisors are generally responsible for creating a safe and healthy work setting and for integrating loss control fundamentals into work activities. Supervisors are those employees at each location who have been given the responsibility to ensure that all employees are doing their job in a safe manner and in a safe work environment. Supervisors are the employees' direct link to management and should have the confidence of all the employees.

Other responsibilities include:

- 1) Training and educating employees in hazard-free work methods and techniques. Supervisors are normally the most experienced employees at each job location and should therefore ensure that managers are scheduling needed training and provide assistance in this training.
- 2) Enforcing the use of proper guards, controls and work practices. In addition to enforcing the rules, supervisors should set a good example for all employees.
- 3) Actively supporting safety committee activities by attending meetings and getting involved in daily safety activities.
- 4) Supervising and evaluating overall worker performance, including safety. Supervisors should report to management annually on each employee or at any other time the employee is observed violating safety policy. Reports to management should also include when any employee is deserving of special recognition for safety performance.
- 5) On a daily basis, monitoring each area for human, situational and environmental factors that could cause accidents.
- 6) On a quarterly basis, conducting formal safety inspections with the manager.
- 7) Investigating all accidents in each area to identify causal factors and implement corrective action. This is done with the manager and the employee as soon as possible.

While the supervisor is often called the "key" person in the loss control chain of responsibility, it is the employee who must put the developed safety techniques and work methods into practice.

Role of the Employee

Well-trained and educated employees are the greatest force against injury, damage and illness in the work environment.

Each employee shares the following responsibilities within the scope of the loss control program:

- 1) Observing safety and health rules and regulations and federal, state and local standards applicable to the job.
- 2) Recognizing and reporting observed hazards immediately.
- 3) Developing good practices of health, hygiene and housekeeping.
- 4) Reporting all accidents or injuries immediately and cooperating in the investigation of them.
- 5) Regularly participating in safety committee activities, safety campaigns, and training programs with enthusiasm.

The integration of these levels of responsibility, combined with the coordinated efforts of the safety committee, should lead to the development and retention of a hazard-free work environment.

ACCIDENT INVESTIGATION

Every accident is investigated by the supervisors and/or managers, with the help of the involved employees, using the Accident Investigation Report shown following this section to document the accident, determine all causes, and initiate corrective action. Each accident is investigated as soon after the occurrence as is feasible, and always within twenty-four hours. The investigation report should answer the questions WHO, WHAT, WHEN, WHERE, HOW, and WHY and then give actions to prevent recurrence of this type of accident again. The corrective action should be communicated to all locations by management and implemented at all job sites where it is applicable.

Accident investigation recordkeeping provides the source of information for the three major areas of the accident investigation sequence: DESCRIPTION, ANALYSIS, and PREVENTION. Each accident investigation should be documented on the form within this program. The form should be maintained for three (3) years in the office location where the incident occurred, with copies forwarded to the corporate office. The report will include information on the person injured, job title, tasks being performed at the time of the accident, cause of the accident and what corrective action should be taken to prevent recurrence. After the corrective action is implemented and communicated to all locations, this should be documented on the report and filed.

While recordkeeping is important, its value depends greatly on the extent to which the data is used for analysis and corrective action purposes.

Management Participation and Review

Management shall review each accident investigation and provide input into any necessary corrective action. During the next site self-inspection, management should insure that the corrective action has indeed been implemented. Each year during the annual review of accidents and trends by managers, the development of trends should be investigated for particular types or locations of losses.

Corrective action procedures are established and implemented by management based on the following control measures:

- **ENGINEERING CONTROL:** Removing the hazard through engineering practices such as workstation design, equipment replacement, and employee isolation.
- **ADMINISTRATIVE CONTROL:** Educating and training the employee as to the inherent hazards associated with the job task.
- **PERSONAL CONTROL:** Issuing personal protective equipment where needed and instructing the employee as to proper use and maintenance.

Senior management support is critical in the implementation of these elements of accident record keeping, reporting and analysis. As with all aspects of loss control, the degree of management involvement and support will ultimately determine the degree of success of the overall loss control program.

Annual Accident Analysis

Periodically (and at least annually), all accident investigations are analyzed to determine trends and recurring problems and to determine further control measures needed. Injury and illness rates should be determined using formulas to compute frequency and severity rates and comparing these to the national rates published by the Bureau of Labor Statistics or available from our insurance company. Comparison of these rates to other companies doing similar jobs will help us determine unfavorable trends and problems in our workplaces.

Analysis of individual accident reports should identify the locations or departments in which injuries occur most frequently, and suggest counter-measures necessary to reduce accidents in those areas. In addition to the supervisor and manager, individual report analysis is a function of the top management and is a standard part of every safety meeting agenda.

OSHA Requirements

The federal government requires that certain accident records be maintained in conjunction with the Occupational Safety and Health Act (OSHA). Each facility is provided with the necessary OSHA recordkeeping logs (OSHA 300 Log), accident investigation forms and related instructions.

Further information on accident recordkeeping is contained within the “Recordkeeping” section of this Safety Manual.

SUPERVISOR'S ACCIDENT INVESTIGATION REPORT

Injured: _____ Age: _____

Department: _____ Occupation: _____

Date of Incident: _____ Time: _____ AM/PM: _____

Nature of Injury/Property Damage: _____

Object/Equipment/Substance Inflicting Injury: _____

Medical Treatment by: _____

Location of Treatment: _____

Description of Incident: _____

Contributing Factors: _____

Loss Severity Potential: High/Major _____ Medium/Serious _____ Low/Minor _____

Probable Recurrence Rate: Frequent _____ Occasional _____ Rare _____

Action Taken to Prevent Recurrence: _____

Supervisor/Manager: (Print) _____

(Signature) _____ Date: _____

Investigated by: _____ Date: _____

Reviewed by: _____ Date: _____

SAFETY INSPECTION PROGRAM

Safety inspection programs involve all of the following:

- 1) Management
- 2) Technical specialists
- 3) Supervisors
- 4) Safety committees

The type and frequency of the safety inspection is based on individual facility/operational need. All departments must be inspected at least quarterly and the results submitted to management for review and necessary corrective action. Inspection results should also be discussed at safety meetings to ensure that all departments and employees are aware of the hazards identified and control measures implemented. Problems found at one location should be communicated to all locations doing the same type work. Corporate office management will be responsible for relaying this information to all locations to insure that the same type problems do not cause accidents at other locations. Each location is responsible for maintaining a safe workplace, which includes communicating with other locations about the specific problems they are having and how they eliminated them.

The Safety Inspection Report should be the format used to complete the safety inspection and should be used for all safety inspections. Different forms may have to be developed for special types of operations, therefore necessitating the use of multiple self-inspection forms. It is the duty of the manager to insure that the correct form is being used and being done in a timely manner. It is also the duty of the manager to insure that any deficiencies found are corrected immediately to prevent accidents.

There are three parts to any good safety program that insure its success: the training of employees; self-inspection; and investigation of accidents. We will emphasize these parts of our Safety Program and demand that they are done timely, correctly and thoroughly.

Management Participation

Management participation, not only during inspections, but also in correcting hazards when observed, provides substantial support and influence concerning employee participation in the Safety Program. Management input/review of inspection results is therefore mandatory. Management shall also insure that the results of the inspections are included within the agenda of the safety meetings for all areas of work and will communicate with all locations to insure that similar hazards are not found elsewhere as were found during self-inspections at one particular location.

Job Safety Analysis

Job Safety Analysis (JSA) is a procedure to analyze each step of a job to identify hazards or potential accidents and to develop solutions that will minimize or guard against such hazards. JSAs provide significant information when evaluating accident causes and determining

corrective action. A JSA shall be completed by supervisors to analyze each job task under their jurisdiction when that job has been the area of an accident. The results must be submitted to management for review and determining the necessary corrective action, which will be documented in the accident analysis to prevent recurrence.

RECORDKEEPING

Accident Records

The OSHA 300 Log of Occupational Injuries and Illnesses should be completed as accidents occur and maintained for five (5) years at the applicable location with a copy sent to the corporate office. Each year, prior to February 1st, the form should be posted at each work site and left up until at least March 1st. A summary of all locations combined on one form should be maintained at the corporate office and posted in February of each year also. All these forms will be kept for five (5) years.

The accident investigation forms should be kept at each location for at least three (3) years from the just completed year. The annual loss analysis of all losses at each location should be kept for three (3) years. At the corporate office, an annual loss analysis should be done for all locations combined and kept for three (3) years.

Self-Inspection

All records of inspections should be kept for three (3) years. Copies of these inspection reports should be sent to the corporate office after the corrective action has been implemented and documented to remove hazards found.

Safety Meetings

Records of safety meetings should be maintained for three (3) years at the location where the meetings are held. Copies of the safety meeting records should be sent to the corporate office annually showing that the meetings were held.

Training

Records of training of all employees should be kept at the location where the training is conducted, a copy put in the employee's personnel file, and a copy sent to the corporate office for training files. Any certificates obtained as a result of training should be copied and made a part of the employee's personnel file. A record of training can be as simple as a sign-in sheet listing what the training was and when it was conducted. These records will be kept for three (3) years.

Program Audits

An annual audit of the corporate Safety Program will be conducted. This audit, corrective action, and all documentation should be maintained at the corporate office for three (3) years.

SPECIAL OPERATIONS

Many operations have certain work activities that require more specified control procedures (e.g., hazardous materials handling, driving, etc.). These requirements may be based on federal, state and/or local codes. Detailed control activities must be planned, scheduled, reviewed and approved by the managers and supervisors. After approval, the control measures must be implemented.

Machine Guarding

Each piece of machinery at any location must be evaluated as to potential injury-producing areas and the appropriate guarding measures that should be provided.

Lockout-Tagout Procedures

Any process or equipment which can become energized during repairs or adjustments must have procedures to lockout and tag the equipment to prevent activation or machine movement during maintenance or repairs.

Lockout-Tagout procedures are explained in a separate manuscript, a copy of which is available to each location and any employee it may affect.

It is the responsibility of the management to ensure that an effective Energy Control (Lock-Out/Tag-Out) Program exists. It is the responsibility of management to ensure that the necessary Lock-Out/Tag-Out procedures are followed.

OSHA Requirements

The federal government has outlined requirements regarding safety that businesses must follow, with special requirements for specific industries or exposures. The applicable OSHA regional office should be contacted for consultative assistance in these areas if any special hazards exist.

Hazard Communication Program

In many of our operations, we have employees exposed to hazardous materials. OSHA has outlined a program of Right-To-Know or Hazard Communication. The program is contained in this document and makes up part of our total Safety Program. Each location must have this Hazard Communication Program in place, use it, do the necessary training, and keep the necessary records of hazardous materials in the workplace and related training. Refer to the Hazard Communication Program for complete details.

SUPERVISOR TRAINING

Even though senior management is ultimately responsible for safety, the supervisors are considered the "key" people within the loss control program. The supervisor is the level of management closest to the actual activities being performed and can enforce safety rules and correct unsafe acts and unsafe conditions at the time of occurrence.

Supervisors must be trained in performing their safety responsibilities. Training will be done in-house by employees qualified to do so, by using outside professionals, or by the use of purchased or rented training videos.

Supervisory training includes:

1) **Performing Accident Investigations**

Supervisors will be formally trained in how to investigate accidents:

- (a) when this program is first put in place;
- (b) when the employee is first promoted to supervisor; and
- (c) annually thereafter as a refresher in accident investigations.

The training will cover how to determine basic causes of accidents, how to determine and implement corrective action to prevent recurrence, and how to complete the paperwork associated with the accident investigations.

2) **Inspecting Work Areas**

Supervisors will be formally trained in self-inspection procedures:

- (a) when this program is first put in place;
- (b) when the employee is first promoted to supervisor; and
- (c) annually thereafter as a refresher in self-inspection.

The training will cover what to look for in the inspections, how to complete the paperwork involved, and how to implement corrective action for hazards found. The training should stress the importance of inspections in preventing accidents.

3) **Developing and Maintaining Employee Motivation**

Supervisors will be trained in motivating employees when they first are promoted to the job of supervisor. It is the inherent responsibility of the supervisor to keep employees motivated by example, by being motivated themselves, and by doing the job with enthusiasm.

4) **Conducting Departmental Safety Meetings**

Supervisors will be formally trained in conducting safety meetings:

- (a) when this program is first put in place;
- (b) when the employee is first promoted to supervisor; and
- (c) annually thereafter as a refresher in conducting safety meetings.

The supervisor will be trained in a formal setting on how to schedule safety meetings, how to conduct the meetings, how to document the meetings, and what to include in the agenda as shown within this Safety Program. Conducting safety meetings is a very important part of the supervisor's job and responsibilities.

5) **Conducting Periodic Safety Activities**

Supervisors will be trained in keeping the idea of a safe workplace in the minds of all employees. The corporate office will occasionally communicate with the supervisors any new safety activities planned, such as employee training, employee incentives, or other special safety activities.

6) **Completing Job Safety Analyses (JSA)**

All supervisors will be trained upon taking the job of supervisor in the proper techniques to conduct JSAs and the proper manner in reporting and using the information. This will be done informally by another available supervisor who has at least three (3) years experience in JSAs.

MANAGER TRAINING

The department managers will be trained by corporate staff upon taking the job and when this safety policy is put into place. The managers will be trained mainly in motivation of supervisors, follow-up on safety reporting, and motivation of employees. This training will also be part of an annual safety meeting of all managers at a specified location.

EMPLOYEE TRAINING

Employees must be educated in their responsibilities relating to loss control. They must see the need and have the desire to implement the safety procedures set by senior management.

Active employee participation in the loss control program will benefit management by:

- 1) Producing a reduction in losses
- 2) Increasing employee morale and reducing turnover
- 3) Providing management with insight into safer procedures and better efficiency through employee suggestions

All operations should have a planned employee training program to include initial education and refresher training. Specific subjects for employee training must be determined on an individual location basis, but should at a minimum include the following:

Hazard Communication

Training will be done on hazard communication per our HazCom Program included as a part of this Safety Manual and per the requirements of OSHA. This training will be done for all hazardous materials upon hiring, when a change in hazardous materials occurs, and annually for refresher training. All employees will be part of this training, which will be conducted by supervisors and managers.

Safety Meetings

Safety meetings will be used on a quarterly basis to do most of the training for employees. These meetings will each have a specific topic of training for employees.

Safety Equipment

All employees who are required to use any special safety equipment in their job will receive entry training and annual refresher training in the safety equipment and the hazard making the equipment necessary. This will be done in conjunction with our HazCom Program. The safety equipment will include, but not be limited to, eye protection, hearing protection, hard hats, safety shoes, etc.

Safety Rules

Upon hiring, every employee will be trained in the safety rules of this Company and their specific job. This will be done in employee indoctrination, which will be conducted by managers prior to allowing the employee to enter the job area. Thereafter, specific safety rules will be discussed in monthly safety meetings, when violations occur as observed by supervisors or managers, or when new rules are implemented.

Duties

The duties of the employee as per our Safety Program will be given to the employee upon hiring in the employee indoctrination. These duties are included in the program in the section “Duties and Responsibilities”. Refresher training will be done when those duties change or when violations occur.

Emergency Preparedness

Employee training will be done within three months of the implementation of this Safety Program and annually thereafter. This training will include the Emergency Preparedness Program as it is included within this program, where and how to evacuate, where to congregate and who to report to after evacuation, the need for emergency preparedness, and the responsibilities of each employee in evacuation in an emergency. This training will also include annual training in the proper use of portable fire extinguishers for all employees.

Occupational Health

This is part of our Hazard Communication Program and training will be done as a part of that program for all employees as per OSHA requirements.

SAFETY MEETINGS

The management team facilitates communication. One of the functions of management is to create and maintain an active interest in safety and to reduce accidents. This is carried out through formal meetings held for two purposes:

- 1) To discuss matters of immediate importance, such as accidents, hazardous conditions, new operations and equipment; and
- 2) To learn about safety through lectures, audio-visual presentations and demonstrations.

All major divisions, departments and locations should be represented at safety meetings. The managers or their designees should schedule and run the meetings.

It is important to establish an agenda from which the safety meetings will proceed. The actual topics on the agenda may vary due to size, function and complexity, but certain elements will be common to each meeting.

A basic agenda is outlined below:

- 1) Call to Order
Reading of minutes of prior meeting
- 2) Prior Business
Status of inspection/recommendations
Review of corrective action on prior accidents
Unfinished business tabled from previous meeting(s)
- 3) New Business
Report of most recent inspection
Review of accidents
Status report on current projects
Plans for training, campaigning, etc.
- 4) General Comments
Monthly safety theme
Special presentation/lecture
Agreement on next inspection
- 5) Adjournment
Tentative date for next meeting

Minutes will be documented using the form shown after this section.

The minutes, including results of committee safety inspections, will be distributed to applicable managers for review and necessary corrective action and feedback to the corporate office.

REPORT OF SAFETY MEETING

Department/Location: _____

Date of Meeting: _____ Called to Order: _____ AM/PM

Number of Employees Present: _____ Absent: _____ Excused: _____

Accidents Reviewed: _____

Subjects Presented and Discussed: _____

Comments/Suggestions/Recommendations: _____

Action Taken: _____

Additional Comments: _____

Sign-In:

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Meeting Adjourned: _____ AM/PM Date of Next Meeting: _____

Supervisor/Manager:(Name/Title) _____

FIRST AID PROGRAM

Management shall adopt and implement a first aid program for each location and each work shift. This program shall include, but not be limited to:

- 1) A trained first aid person who has successfully completed the Red Cross training program shall be available at each location during each shift. This person must submit a copy of his/her certification card to Human Resources each year at the anniversary date of their hire. HR will check the validity of the certification;
- 2) A first aid kit shall be available to all employees at each location at all times. It shall be the responsibility of HR to make sure the kit is properly stocked with supplies that meet the needs of the job exposures in that work area;
- 3) Emergency phone numbers shall be posted near the first aid kit at each location. These numbers shall include the numbers for key personnel and for local medical services recognized and approved for use by HR;
- 4) A list shall be maintained at the first aid kit and in HR of anyone using the first aid kits. Any time an employee uses the first aid kit, they are to sign the sheet and list the items removed;
- 5) During indoctrination of new employees and annually thereafter, employees should be trained in the use of the first aid kit and the recordkeeping requirements of it; and
- 6) Only those employees trained to do so shall administer any type first aid, CPR or life saving activity to any employee needing such.

EMERGENCY PREPAREDNESS

Every location has the potential of undergoing an emergency situation, whether it is related to fire, weather, catastrophic accident, civil strife, or other emergency. All potential emergency or catastrophic exposures must be considered and control procedures evaluated for each location.

A written plan will be devised, practiced, and periodically revised as necessary to prepare each facility for each emergency that may arise. Our plan will comply with federal, state and local regulations pertaining to emergency preparedness.

A Disaster Recovery Plan (DRP) is designed to ensure a rapid and effective recovery of the facility's operating capabilities in the event a disaster occurs.

An Emergency Evacuation Plan is an integral part of the DRP, and is designed to ensure the life safety of the employees and occupants of the facility.

Emergency Evacuation Plan

1) Evacuation

All exits must be properly marked, means of egress kept clear, and employees trained in evacuation procedures.

2) Facility Protection

The self-inspection program must include checks of private and public protection of buildings and equipment.

3) Inspection, Maintenance and Readiness of Proper Emergency Equipment

The self-inspection must include checks of emergency equipment, their location, and training of employees in their use.

4) Public Relations and Employee Welfare

The general public will be notified by the manager at the location where the emergency exists if it endangers the public.

5) Fire Fighting

Employees will be trained in use of fire extinguishers and general fire fighting.

6) First Aid/CPR

Each location for each shift at all times will have at least one employee trained in CPR and first aid at the site.

7) Control of Utilities

The manager will contact public utilities or plant maintenance when an emergency involves the need to disconnect gas, electric, etc. services.

- 8) Pollution/Decontamination**
If the emergency involves a hazardous material spill, managers will contact the local authorities and EPA or applicable authority.
- 9) Communication**
Manager will be responsible for contacting the correct authority when any type of emergency occurs. They will determine who needs to be contacted and make the necessary calls. Emergency phone numbers shall be posted in appropriate places in each facility.
- 10) Transportation**
Our management will provide transportation for employees injured if the injury is not serious. If the injury is serious, 911 must be called to contact the local emergency medical teams.
- 11) Recordkeeping**
Proper records will be kept of all emergencies using the accident investigation report. Managers will be responsible for investigating all emergencies to determine if our employees were at fault, what the cause was, and what corrective action needs to be implemented.
- 12) Drills**
Annual drills will be conducted at each location for evacuation. Employees will be trained in what to do in a drill as if it were a real emergency. Records will be kept of the drills also. Evacuation routes and assembly areas shall be conspicuously marked. One employee in each department shall be responsible for accounting for all in their department during the evacuation.

STAFF TRAINING

Training is important to the effectiveness of the Emergency Preparedness Plan. A list must be posted with names, departments, functions, and phone extensions in strategic locations throughout each location. Backup staff personnel should also be confirmed to cover vacations, illnesses, and other absences of the existing staff. Management is responsible for periodically reviewing the duties of the staff to ensure that they remain current.

Formal staff training shall be conducted at least annually and shall include a thorough review of the following:

- 1) Text of the plan
- 2) Notification of initiation of the plan
- 3) Reporting procedures
- 4) Shutdown procedures
- 5) Types of potential emergencies

While staff meetings are important for the completion of training in the above areas, it should be emphasized that the most important part of the overall emergency preparedness procedure is the PRACTICE DRILL.

Full evacuation and disaster recovery drills will be conducted at least annually with the proceedings, results, and recommendations documented and submitted to management for review and corrective action.

LOSS CONTROL PROGRAM AUDIT

Every loss control program should include an audit procedure to determine the effectiveness of that program. Conduct the audit annually using the following outline:

- 1) Nature of Operations
 - Operations
 - Processes
 - Equipment
 - Personnel
- 2) Experience
 - On-the-Job Accidents
 - Off-the-Job Accidents
- 3) Organization
- 4) Recordkeeping
 - Accident Records
 - Inspection Records
 - Maintenance Records
 - Personnel Records
- 5) Exposure/Hazard Identification
 - Evaluation of Controls
- 6) Management
- 7) Accountability for Safety
- 8) Management/Operations Interface
- 9) Inspections
- 10) Emergency Preparedness
 - Disaster Recovery Program
 - Emergency Evacuation Program
 - Drills
- 11) Accident Records and Analysis
 - Recordkeeping
 - Analysis
- 12) Loss Analysis
 - Causal Factors
 - Corrective Action
 - Trends
- 13) Selection and Placement of Employees
- 14) Training and Supervision
- 15) Medical Program
- 16) Motivation
- 17) Goals and Objectives
- 18) Overall Program Evaluation
- 19) Recommendations for Improvement

PROGRAM AUDIT CHECKLIST

ELEMENT	OPERATIONAL	NEEDS IMPROVEMENT	COMMENTS
Policy Statement	_____	_____	_____
Assignment of Responsibility	_____	_____	_____
Accident Recordkeeping, Reporting and Analysis	_____	_____	_____
Hazard Identification and Control	_____	_____	_____
Supervisory Safety Training	_____	_____	_____
Safety Program Organization and Operation	_____	_____	_____
Employee Motivation and Training	_____	_____	_____
Emergency Preparedness	_____	_____	_____
Loss Control Program Audit	_____	_____	_____
Other	_____	_____	_____

Name: _____

Title: _____

Location: _____

Date: _____

HAZARD COMMUNICATION

A written Hazard Communication Program has been developed and implemented using the guidelines established by OSHA to address exposures associated with hazardous materials.

Supervisors must implement the Hazard Communication Program according to the following action plan.

Hazard Identification (Inventory and Labeling)

An inventory of hazardous materials must be developed, maintained and updated based on routine inspection results and communication with the Purchasing Department.

All containers should have proper labels which list the hazardous materials contained and appropriate hazard warnings. Where such containers are found to be unlabeled or insufficiently identified, the manufacturer and/or supplier must be contacted immediately for labeling information. A control log is used to monitor the inventory of labeled and unlabeled materials.

The hazardous materials inventory is supported by appropriate documentation and recordkeeping procedures, including retention of Material Safety Data Sheets (MSDS). The enclosed form should be used to request MSDS sheets from manufacturers. The attached list should be used to inventory hazardous materials.

Employee Orientation and Training

All employees who are subject to exposure to hazardous materials must be both informed and trained concerning protective measures.

The following information must be provided in annual training for HazCom and in refresher training as necessary because of new hazardous materials, new employees, etc.:

- 1) Requirements of the OSHA standard
- 2) Operations involving hazardous materials exposure
- 3) Location and accessibility of the Hazard Communication Program
- 4) Hazardous materials inventory
- 5) Material Safety Data Sheets

Annual employee training will include:

- 1) Methods and operations that may be used to detect the presence of hazardous materials
- 2) Physical and health hazards of the materials in the workplace
- 3) Measures taken to protect the employees from these hazards, including exposure monitoring, personal protective equipment, etc.

- 4) Explanation of how to interpret the information found on labels and the MSDS
- 5) Details of the Hazard Communication Program

Special Precautions for Non-Routine Operations and Outside Contractors

The same procedures outlined in the above sections for routine hazardous materials identification and control also apply for non-routine operations that are unique to specific operations, departments or locations, as well as for operations involving outside contractors.

State and local Hazard Communication/Right-to-Know laws should be reviewed and implemented by management where applicable.