



Workplace Environmental & Safety Program



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1. MANAGEMENT COMMITMENT AND INVOLVEMENT

██████████ is sincerely interested in the safety and welfare of their employees. Accident prevention is essential in maintaining an efficient operation. Company management is committed to safety and the abidance of federal, state, and local regulations. Management shall establish the safety rules and programs, and provide supervision with backing, training, and funds to implement these rules and programs.

1.1 POLICY STATEMENT

██████████ believes in safe, responsible, and sustainable business practices that benefit our business, our employees, our communities, and society for generations to come. Our governance is centered upon evolving policies and practices to ensure Environmental, Health, Safety, and Sustainability for not only our business, but for those we serve. We hold ourselves and our suppliers to continuously improving standards of compliance and performance. ██████████ will:

1. Provide a voluntary, safe, healthful, and fair work environment;
2. Comply with applicable legal, regulatory, statutory, and internal EHS requirements;
3. Promote employee and community safety, health, and wellness;
4. Proliferate and reinforce EHS principles through education, training, and supervision;
5. Set goals and targets to track our achievements and improve our performance;
6. Implement best practices in injury prevention;
7. Establish consistency, clarity, and rapidity in investigating, reporting, and preventing incidents;
8. Verify internal and supplier EHS implementation through our audit and assessment programs;
9. Periodically review this policy through internal governance.

The four (4) main areas of the ██████████ Sustainability Program are:

1. Increasing recycling
2. Reducing Scrap
3. Improving Utility usage
4. Providing sustainable material options to our customers

SAFETY POLICIES AND PROCEDURES MANUAL

Signature of Authorized Representative

Date

2. RESPONSIBILITIES

2.1 COMPANY MANAGEMENT

- Has the overall responsibility for the company's safety program and regularly reviews loss control activities for future proactive opportunities to be taken and measures to be implemented as needed
- Ensures that employees are informed of top management's commitment to safety and the abundance of federal, state, and local regulations

2.2 SAFETY MANAGEMENT

- Responsible for implementation and monitoring the safety program
- Regularly reviews applicable federal, state, and local safety and health regulations
- Implements and monitors safety training programs and provides safety materials as needed
- Assists site supervision in incident investigation and recommends controls to prevent reoccurrence
- Assures proper notification in the event of an incident
- Assists with external safety-related audits/inspections
- Responsible for training employees in safe work procedures

2.3 DEPARTMENT MANAGERS/SUPERVISORS

- Responsible for the safety of their employees and oversees the compliance with the safety program and applicable federal, state, and local regulations
- Responsible for performing safety inspections of their department
- Responsible for training their employees in safe work procedures
- Arranges for prompt medical attention in case of an injury or illness and provides a thorough written investigation report with witness statements, pictures, if applicable, and recommendations to prevent reoccurrence within 48 hours of the accident

2.4 EMPLOYEES

- Responsible for learning and abiding by the rules and regulations which are applicable to their assigned tasks
- Perform their job functions in the safest possible manner and encourage co-workers to do likewise

3. SAFETY RULES, POLICIES, AND PROCEDURES

The safety rules contained on these pages have been prepared to protect you in your daily work. Employees are to follow these rules, review them often and use common sense in carrying out assigned duties.

While these rules are very important, it is impossible to publish a rule to cover every circumstance. If a rule that might cover a specific hazard condition is not listed, that shall be no excuse for disregard of common sense in the performance of your work.

These safety rules shall include both general workplace safety rules and job-specific safety rules.

3.1 ALL EMPLOYEES

GENERAL

1. All injuries, regardless of how minor, must be reported to your supervisor immediately.
2. Report any equipment or condition considered to be unsafe as well as any unsafe work practices to the supervisor or EHS Representative.
3. Be courteous and avoid distracting others as distractions may cause or contribute to accidents.
4. Do not engage in horseplay or running around on the job.
5. The possession or consumption of alcohol, drugs, or any controlled substance is against policy and violators are subject to dismissal. [REDACTED] will assist an employee to find a suitable treatment facility if a problem is discussed with their department manager or Human Resources.
6. Be aware of your surroundings while walking through the warehouse as forklifts may be in use.
7. Know the location of fire extinguishers and eyewash stations in your work area.
8. Know the evacuation routes for your work area and the designated meeting place.
9. Do not damage, disable, or interfere with safety, firefighting, or first-aid equipment.
10. Obey posted safety and danger signs.
11. Comply with Lockout/Tagout (LOTO) procedures.
12. Do not bring weapons, guns, or explosives onsite.
13. Violence or threats will not be tolerated.

HOUSEKEEPING

1. Use caution signs/cones to barricade slippery areas.
2. Do not store or leave items on stairways.
3. Return tools to their proper storage place after using them.
4. Do not block or obstruct exits, or access to safety and emergency equipment such as fire extinguishers or fire alarms.
5. Do not place materials such as boxes or trash in walkways and passageways.
6. Do not use gasoline for cleaning purposes.
7. Mop up water around water coolers, drink machines and ice machines.
8. Clean spills immediately or mark the spill if you must leave to retrieve assistance or additional supplies.

9. Clean up your own trash.
10. Remove any slip, trip, or fall hazards in the workplace.

LIFTING PROCEDURES

General

1. Test the weight of the load before lifting by pushing the load along its resting surface.
2. If the load is too heavy or bulky, use lifting and carrying aids such as hand trucks, dollies, pallet jacks and carts, or get assistance from a co-worker.
3. Never lift anything if your hands are greasy or wet.
4. Wear protective gloves when lifting objects with sharp corners or jagged edges.
5. Look for and adhere to team lift stickers on boxes/containers

When Lifting

1. Face the load.
2. Position your feet 6"-12" apart with one foot slightly in front of the other.
3. Bend at the knees, not at the back.
4. Keep your back straight.
5. Get a firm grip on the object using your hands and fingers. Use handles when they are present.
6. Hold the object as close to your body as possible.
7. Perform lifting movements smoothly and gradually; do not jerk the load.
8. If you must change direction while lifting or carrying the load, pivot your feet and turn your entire body. Do not twist at the waist.
9. Set down objects in the same manner as you picked them up, except in reverse.
10. Do not lift an object from the floor to a level above your waist in one motion. Set the load down on a table or bench and then adjust your grip before lifting it higher.

LADDERS AND STEPLADDERS

1. Read and follow the manufacturer's instruction label affixed to the ladder if you are unsure how to use the ladder.
2. Look at the load capacity of the ladder.
3. Do not use ladders that have loose rungs, cracked or split side rails, missing rubber foot pads, or other visible damage.
4. Keep ladder rungs clean and free of grease. Remove buildup of material such as dirt or mud.
5. When performing work from a ladder, face the ladder and do not lean backwards or sideways from the ladder.
6. Barricade the area when using ladders near doorways.
7. Allow only one person on the ladder at a time.
8. Do not stand on the top two rungs of any ladder.
9. Do not stand on a ladder that wobbles or leans to the left or right of center or is crooked.
10. Do not try to "walk" a ladder by rocking it. Climb down the ladder and then move it.
11. Do not use metal ladders around electrical lines.

Climbing a Ladder

1. Face the ladder when climbing up or down.
2. Do not carry items in your hands while climbing up or down a ladder.
3. Maintain a three-point contact by keeping both hands and one foot or both feet and one hand on the ladder at all times when climbing up or down the ladder.

DRIVING/VEHICLE SAFETY

Fueling Vehicles

1. Turn the vehicle off before fueling.
2. Do not smoke while fueling a vehicle.
3. Wash hands with soap and water if you spill gasoline on them.

Driving Rules

1. Shut all doors and fasten your seat belt before moving the vehicle.
2. Obey traffic patterns and signs at all times.
3. Maintain a three-point contact using both hands and one foot or both feet and one hand when climbing into and out of vehicles.
4. Do not leave keys in an unattended vehicle.

3.2 PRODUCTION PERSONNEL

1. Adhere to personal protective equipment (PPE) requirements.
2. If operating machinery, do not wear torn, ripped, loose-fitting clothing, or anything with cords that can get caught in moving parts.
3. Report incidents to your supervisor immediately.
4. Inform co-workers of any unsafe act or behavior they are engaged in; if the unsafe act or behavior continues, inform your supervisor.
5. Do not take 'shortcuts' in your job task to complete the job faster if the shortcut will lead to an unsafe act.
6. Only authorized and trained employees may repair or operate machinery and equipment.
7. Only authorized and trained employees may operate a forklift.
8. Use the proper tools to perform your job task(s) and only use tools as they were intended to be used to avoid injury. Inspect the tool before use to ensure it is in working order.
9. Do not operate machinery that you are not familiar with and have not been trained to use.

3.3 OFFICE PERSONNEL

OFFICE SAFETY

1. Do not place material such as boxes or trash in walkways and passageways.
2. Do not throw matches, cigarettes or other smoking materials into trash baskets.
3. Do not kick objects out of your pathway; pick them up or push them out of the way.

4. Keep floors clear of items such as paper clips, pencils, tacks, staples, cords, and any other tripping hazards.
5. Straighten or remove rugs and mats that do not lie flat on the floor.
6. Do not block your view by carrying large or bulky items; use a dolly or hand truck or get assistance from a fellow employee.
7. Store sharp objects, such as pens, pencils, or scissors, in drawers or with the points down in a container.
8. Carry pencils, scissors and other sharp objects with the tips pointing down.
9. Use a ladder or step stool to retrieve or store items that are located above your head.
10. Do not run on stairs or take more than one step at a time.
11. Keep doors in hallways fully open or fully closed.
12. Use handrails when ascending or descending stairs.

FURNITURE USE

1. Open only one file cabinet drawer at a time. Close the filing cabinet drawer you were working in before opening another filing drawer in the same cabinet.
2. Use the handle when closing doors, drawers and files.
3. Put heavy files in the bottom drawers of file cabinets.
4. Do not tilt your chair on its back two legs while you are sitting in it.
5. Do not stand on furniture to reach high places.

EQUIPMENT USE

1. Do not use fans that have excessive vibration, frayed cords or missing guards.
2. Do not place floor-type fans in walkways, aisles or doorways.
3. Do not plug multiple electrical cords into a single outlet.
4. Do not overload outlets or extension cords when connecting appliances or computers.
5. Do not use extension or power cords that have the ground prong removed or broken off.
6. Do not use frayed, cut or cracked electrical cords.
7. Use a cord cover or tape down cords when running them across aisles, between desks or across entrances or exits.

4. INJURY AND ILLNESS PREVENTION

In order to maintain a safe and healthy environment for our employees, contractors, and vendors, [REDACTED] has established a culture where employees can identify and correct safety hazards that are found within their work environment.

4.1 HAZARD ASSESSMENT

Documented inspections of the facility and surrounding areas for health and safety concerns shall be conducted on a monthly basis by supervisors and/or the Safety Committee. Employees that want to report a health or safety concern, but want to remain anonymous, can use the suggestion boxes located in the break rooms. When an unsafe condition is observed, it should be immediately corrected and then reported to the EHS Representative.

For safety conditions that cannot be immediately corrected by the employee, he/she should report the incident to the EHS Representative, their supervisor, or any member of management. When an unsafe condition cannot be immediately corrected, employees will be restricted from entering the area and a member of management or the Emergency Response Team will set up a containment area.

4.2 HAZARD COMMUNICATION

Workplace hazards are communicated to new hires as part of the new hire orientation. When new items are brought into the facility and pose a health or safety risk, affected employees will receive additional training. Safety Data Sheets (SDS) will be available for employees to provide important information on potential health and safety hazards related to chemicals or hazardous materials in their work environment.

4.3 POWERED INDUSTRIAL TRUCK OPERATING MANUALS

Powered industrial trucks shall be operated as specified in the equipment's operating manual. Copies of the operating manuals shall be available for review at any time for employees in a place within the warehouse determined by management. The safe operation of powered industrial trucks is part of the equipment certification process for new operators. Only certified operators that are displaying their valid operator's permit may operate powered industrial equipment. Each powered industrial truck shall be inspected daily prior to use.

4.4 LOCKOUT/TAGOUT (LOTO)

LOTO is used to protect employees who operate power equipment, use power equipment chargers, have access to energized switches, or have exposure to energized sources where unexpected energizing of the device could occur and cause injury or death. The use of LOTO is mandatory any time energized equipment is being serviced or taken out of service due to a safety issue.

The LOTO is a safety device to protect you and should never be altered, tampered with, or removed. LOTO devices are to be used for the sole purpose of isolating and de-energizing equipment or devices. Only authorized employees have access to the LOTO devices. Should you find a piece of equipment with a LOTO device, please find another piece of equipment to use. If you are operating a piece of equipment and it stops working, immediately notify a supervisor so the proper LOTO procedures are initiated.

4.5 FIRST AID AND CPR RESPONSE

Several employees shall be trained and certified in First Aid and CPR. These certified employees shall respond to minor medical incidents or injuries that occur in the facility. If the certified employee(s) cannot resolve the incident or injury with first aid treatment, they will escalate the incident with a call to 9-1-1 or the Shift Lead/Management to have the employee seen at a local clinic or hospital. Certified employees are required to attend a recertification course at least once every two (2) years. Training will be conducted during normal employee work hours and on company time. Bloodborne Pathogen training shall be provided annually.

4.6 FIRST AID KITS

First aid kits are stationed in the facility in areas accessible to employees to minimize response times to medical incidents and accidents. The location of the first aid kits shall be communicated to employees. First aid kits are only designed to treat first aid injuries and should not be the sole means of treating serious injuries. If a minor incident occurs, such as a cut, and supplies are used from a first aid kit, it should be reported to the EHS Representative for documentation. If an employee has sustained a work-related injury that cannot be effectively treated with the first aid kit, it must be reported to the supervisor so that the employee can be taken to a medical clinic or 9-1-1 can be called if necessary.

Employees will not be retaliated or discriminated against for reporting any work-related injury.

4.7 FALL PROTECTION

Employees performing work on an elevated platform are required to wear a harness and lanyard anytime the platform is 10 feet or more off the ground level. Each employee responsible for performing work at elevated heights shall have their own harness. Lanyards and harnesses are safety devices to prevent employees from falling at elevated heights. The lanyard must be securely fastened to the D-Hook of the harness worn by the employee on one side and tether bar of the equipment on the other side. Employees who fail to use the required harnesses and lanyards will be restricted from performing their work and are subject to disciplinary actions if found on the elevated platforms without them.

Lanyards and harnesses are required to be visually inspected by the user on a daily basis before the beginning of their shift with annual inspections completed by Safety Management. An inspection of the lanyard and harness includes the webbing material, hardware, D-Ring, buckles, and grommets. Ensure there are no broken fibers, fraying, un-splicing, kinking, knotting, roping, broken or pulled stitching, burns, abrasions, cuts, or excessive wear. When inspection reveals defects or damage to the

equipment, inadequate maintenance of equipment, evidence of equipment having been exposed to fall arrest forces or loading, the equipment shall be labeled as 'unusable' and turned over immediately to Safety Management for destruction.

4.8 AUTOMATIC RETRACTING SAFETY KNIVES AND SAFETY CUTTERS

The automatic retracting safety knife and safety cutters are tools for the cutting of straps, shrink wrap, and/or boxes. The automatic retracting blade contains safety features to help eliminate or minimize injuries associated with cuts from the blade. Safety cutters have a built-in feature which prevents the cutting blade from being exposed. The company will provide training on the proper use of the knife and cutters to employees with job duties requiring a knife or cutters. Upon successful completion of the training, employees will be issued an automatic retracting safety knife or safety cutters. Employees are to use company-issued safety knives or cutters only.

Safety knives and cutters are required to be visually inspected by the user on a daily basis before the beginning of their shift. An inspection of the safety knife includes the handle, blade, and retractor. Ensure that the handle is fastened tightly and the retractor operates smoothly. When inspecting the blade, visually ensure that it is sharp and free of nicks in the cutting surface. When an inspection reveals defects or damage which will prevent the safety knife or cutters from operating as designed, it shall be turned in to Safety Management for replacement. Replacement knives and cutters will be issued to the employee free of charge when it is determined to be normal wear and tear.

4.9 WORK GLOVES

Warehouse employees that handle wooden pallets are required to wear work gloves, or utility gloves, while performing their work duties. Work gloves provide protection from hazards such as splintered wood and exposed nails. Work gloves will be issued free of charge to employees with duties that require them to handle pallets. Employees are required to visually inspect their work gloves on a daily basis. During the inspection, the employee must look for holes, missing stitching, worn fabric/neoprene, etc. If damage is found, do not use the gloves and immediately take them to your supervisor for a replacement pair. Work gloves found to be damaged due to normal wear and tear will be replaced free of charge.

Employees found handling pallets without work gloves will be subject to disciplinary actions for failing to follow company policy.

4.10 HEAT ILLNESS PREVENTION

With ambient temperatures approaching and sometimes exceeding 100 degrees Fahrenheit, it is important that employees identify and treat heat-related illness in the early stages and prevent medical emergencies. Training will be provided to potentially affected employees annually. Employees will be trained in the following topics:

- Types of Heat-Related Illness and Common Signs and Symptoms
- First Aid Procedures

- Tips to Prevent Heat-Related Illness
- Tips to Stay Hydrated
- Suggested Types of Clothing to Wear
- How to Report signs and Symptoms of Heat-Related Illness

When outside temperatures are projected to be 100 degrees or more, employees are encouraged to use the air-conditioned break room during breaks and lunch. Peer monitoring is also encouraged to get employees involved in reporting heat-related illness concerns to their supervisor or safety committee.

4.11 STRAPPING OR CELLO MACHINE

Strapping machines are semi-automated and designed to strap boxes with some user input. The strapping machines contain hazardous voltage, high temperatures, and moving parts which could present operating hazards. A copy of the strapping or cello machine procedure will be provided to employees who receive the proper training to operate the machine. The strapping/cello machine procedure will inform employees of the safe procedures for operating the machine and protections from potential hazards associated with the machine. By following those procedures and maintaining proper safety awareness, authorized employees will be able to safely operate the machine. Company management is responsible for making sure that the equipment is safe to work on and making sure that you are following established safety procedures.

4.12 COMPACTOR

The compactor is a semi-automated machine operated by authorized employees that have been trained and demonstrated their working knowledge of the machine. The compactor contains hazardous voltage and moving parts which could present operating hazards. Employees are restricted from entering areas with posted signs reading “Danger-Permit Required-Confined Space-Do Not Enter”.

4.13 ACCIDENTAL SPILLS/ENVIRONMENTAL RELEASE

Spills could occur at any time in the facility or out in the environment. When a spill, or environmental release, occurs, it must be properly and expeditiously managed, contained, and removed to protect employee health and the environment. Spills shall be reported immediately to Management and only authorized, trained employees shall participate in the cleanup. The proper PPE must be worn while cleaning a spill and disposed of accordingly. Those employees responsible for cleaning spills shall receive refresher training on an annual basis. If a hazardous chemical or product has spilled, Safety Management must be informed to ensure proper regulatory reporting. Safety Data Sheets (SDS) for chemicals and products onsite are available in hard copy and electronic form.

4.14 REPORTING INJURIES

Employees who are injured while performing their work duties should report the incident to their supervisor immediately. If the injury requires medical treatment beyond first aid, then the employee

shall go the approved medical clinic. In the event of a serious injury, 9-1-1 should be called to dispatch advanced life support. Human Resources will complete the necessary Worker's Compensation paperwork.

Incident investigations should occur immediately with the employee's supervisor and Safety Management.

5. SAFETY AND HEALTH TRAINING

5.1 SAFETY AND HEALTH ORIENTATION

Workplace safety and health orientation begins on the first day of initial employment or job transfer. Each employee has access to a copy of this safety manual, through Human Resources, for review and future reference, and each employee will be trained on the safety rules, policies and procedures pertaining to his or her job. Supervisors will ask questions of employees and answer employees' questions to ensure knowledge and understanding of safety rules, policies and job-specific procedures described in our workplace safety program manual.

Employees will be instructed by their supervisors that compliance with the safety rules described in the workplace safety manual is required.

5.2 JOB-SPECIFIC TRAINING

Employees will be trained by their supervisor who is familiar with the physical and mental requirements for the job. With their new employee, supervisors shall:

- Initially train employees on how to perform assigned job tasks safely.
- Carefully review with each employee the specific safety rules, policies and procedures that are applicable and that are described in this workplace safety program manual.
- Observe employees performing the work. If necessary, the supervisor will provide a demonstration using safe work practices or remedial instruction to correct training deficiencies before an employee is permitted to do the work without supervision.
- Review safe work practices with employees before permitting the performance of new, nonroutine or specialized procedures.
- Employees will receive safe operating instructions on seldom used or new equipment before using the equipment.

5.3 PERSONAL PROTECTIVE EQUIPMENT

Depending on the nature of a job task, certain types of personal protective equipment (PPE) are required to be worn during the completion of the task. Types of PPE include, but are not limited to:

- Eye Protection – safety glasses must be worn in designated areas and per Safety Data Sheet (SDS) guidelines
- Fall Protection – employees exposed to falls over 4 feet are required to be trained and use proper equipment
- Hand Protection – gloves must be worn when certain operations expose hands to cuts, chemicals, burns, etc.
- Footwear – closed-toe shoes are required to be worn in all areas of the facility except in the office environment.
- Respiratory Protection – the appropriate respirator must be worn when dealing with chemicals per the SDS guidelines. Refer to Appendix D.

- Other – specific jobs may cause the need for another type of PPE. The supervisor of that job is responsible in making sure the PPE is appropriate and in good condition. The employee is responsible for utilizing the appropriate PPE, maintaining their PPE, and wearing their PPE as instructed.

Employees are required to inspect the condition of their PPE prior to each use. Any deficiencies noted in the PPE inspection must be communicated immediately to your supervisor so that it can be put out of service and discarded, and a replacement can be supplied.

Safety Management is responsible for the following in regard to PPE:

- Ensuring PPE training is conducted for new employees in their relevant job functions prior to performing that job function independently;
- Ensuring PPE training is conducted whenever an employee learns a new job function, if applicable;
- Ensuring annual PPE refresher training is conducted for all employees;
- Conducting an annual PPE Hazard Assessment;
- Assessing hazardous situations and change within the workplace as necessary, to re-evaluate the suitability of selected PPE

Employees shall be trained to use any PPE that they are required to use based upon the hazard assessment. Training shall include when PPE is necessary, what PPE is necessary, how to properly inspect/dress/remove/adjust/wear PPE, the limitations of the PPE, and the proper care/maintenance/useful life/disposal of the PPE. Each affected employee shall demonstrate and have an understanding of the training and the ability to use PPE properly before being allowed to perform work requiring the use of PPE.

5.4 PERIODIC RETRAINING OF EMPLOYEES

New employees, including new temporary workers, shall participate in orientation training prior to commencing any work activities within the [REDACTED] facilities. Annual training thereafter will be provided as a refresher to employees, including temporary workers.

At a minimum, the orientation training shall cover the following:

- General Safety Rules
- General Safety Best Practices
- Facility Emergency Procedures
- Facility Evacuation Plan
- Facility Shelter In-Place Plan
- Personal Protective Equipment Awareness
- Back Safety and Lifting Techniques
- Bloodborne Pathogen Awareness
- First Aid Kits
- Eyewash/Shower Stations
- Lockout/Tagout Awareness
- Confined Space Awareness
- Control of Hazardous Energy Awareness

- Electricity Safety Awareness
- Equipment Safety Rules including Powered Industrial Trucks
- Ladder Safety
- Hand and Power Tool Safety
- Pallet Safety
- Workplace Violence

Additional annual specific training shall be provided to those employees that participate in the following:

- Personal Protective Equipment
- Hazard Communication
- Security
- LOTO
- Confined Space
- Bloodborne Pathogen for those on the first aid team
- Handling Contaminated Equipment
- Incident investigation- for supervisors/managers
- Hot Work
- Fire extinguishers for those on the emergency response team
- Fall Protection for those who use harnesses and lanyards

If any changes are made to this Safety Program, training will be provided to employees.

Individual employees will be retrained after the occurrence of a work-related injury or illness caused by an unsafe act or work practice, and when a supervisor observes employees displaying unsafe acts, practices or behaviors.

Additional training will also be provided when any new substances, processes, procedures, or equipment which present new hazards are introduced to the work environment.

Training will be documented and retained in accordance with applicable regulations.

6. SAFETY COMMITTEE

6.1 SAFETY COMMITTEE ORGANIZATION

A safety committee has been established to act and advise management for improving environmental, health, and safety conditions at the facilities. The safety committee consists of an equal representation of supervisory and nonsupervisory members of our organization.

6.2 RESPONSIBILITIES

The safety committee will be responsible for assisting management in reviewing and updating workplace safety rules based on incident investigation findings, any inspection findings, and employee reports of unsafe conditions or work practices; and accepting and addressing anonymous complaints and suggestions from employees. Concerns shall be addressed immediately or communicated to a member of management to rectify.

The safety committee will be responsible for assisting management in updating the workplace safety program by evaluating employee injury and accident records, identifying trends and patterns, and formulating corrective measures to prevent recurrence.

The safety committee will be responsible for assisting management in evaluating employee accident- and illness-prevention programs and promoting safety and health awareness and co-worker participation through continuous improvements to the workplace safety program.

Safety committee members will participate in safety training and will be responsible for assisting management in monitoring workplace safety education and training to ensure that it is in place, that it is effective, and that it is documented.

6.3 MEETINGS

Safety committee meetings are held monthly, or more often if needed. The meeting shall provide a forum for members to share their insights and provide solutions to EHS topics and concerns. Safety Management will post the minutes of each meeting (see below) conspicuously within two days after each meeting and distribute to the members and Senior Management.

6.4 SAFETY COMMITTEE MEETING MINUTES

Date of Committee Meeting: _____ Time: _____

Minutes Prepared by: _____ Location: _____

Names of Members in Attendance:

Names of Members Absent:

Previous Action Items: _____

Review of Accidents Since Previous Meeting: _____

Recommendations for Corrections from Accident Investigation Reports: _____

Recommendations for Prevention: _____

Review of Safety-Related Inspections Since Previous Meeting (includes inspections, audits, and citations): _____

Review of Hazards or Suggestions for Workplace Safety Improvements: _____

Workplace Changes which Affect EHS: _____

Federal, State, or Local Regulations which Affect EHS: _____

Recommended Updates to Safety Program: _____

Safety Training Recommendations: _____

New Topics: _____

Comments (include date/time of next meeting): _____



7. SAFETY INSPECTIONS

It is up to all employees to maintain safe working conditions.

Scheduled inspections are performed on a regular basis by the safety committee. The results are documented and sent to department/area managers. Action items and due dates are assigned to applicable employees with the expectation that their action(s) will be completed on or before the given date, or immediately depending on the severity. Tracking action items and due dates will be done on an On-time/Overdue basis.

Inspections will be performed throughout each facility, with topics to be checked including, but not limited to:

- Personal Protection Equipment (PPE)
- Walking/Working Surfaces
- Fire Hazards
- Fire Extinguishers
- Lighting
- Doors and Windows
- Flammable and Combustible Materials
- First Aid Kits
- Lockout/Tagout
- Powered Industrial Trucks and Operators
- Racking
- Security

Areas/operations known to have contributed to an employee injury or illness in the past and other items that may be peculiar to the job or location shall also be reviewed during the inspections.

8. FIRST-AID PROCEDURES

In the event of a workplace injury, employees will be required to submit to a drug test and results will be provided to Human Resources.

8.1 EMERGENCY PHONE NUMBERS

Ambulance / Fire Department / Police: 9-1-1

Medical Clinic: [REDACTED]

Clinic Address: [REDACTED]

[REDACTED]

[REDACTED]

Hospital: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Poison Control: [REDACTED]

Medical Clinic: [REDACTED]

Clinic Address: [REDACTED]

[REDACTED]

[REDACTED]

8.2 MINOR FIRST AID TREATMENT

First aid kits are kept throughout the facilities, in the following locations:

[REDACTED] Plant [REDACTED]

[REDACTED]

[REDACTED] Plant [REDACTED]

[REDACTED]

[REDACTED] Plant [REDACTED]

[REDACTED]

If you sustain an injury or are involved in an accident requiring minor first-aid treatment:

- Inform your supervisor.
- Administer first-aid treatment to the injury or wound.
- If a first aid kit is used, indicate usage on the incident report.
- Provide details for the completion of the incident report.

Reminder: Access to a first aid kit is not intended to be a substitute for medical attention.

[REDACTED]

8.3 NONEMERGENCY MEDICAL TREATMENT

For nonemergency work-related injuries requiring professional medical assistance, management must first authorize treatment. If you sustain an injury requiring treatment other than first aid:

- Inform your supervisor.
- Proceed to the posted medical facility. Your supervisor will assist with transportation, if necessary.
- Provide details for the completion of the incident report.

8.4 EMERGENCY MEDICAL TREATMENT

If you sustain a severe injury requiring emergency treatment:

- Call for help and seek assistance from a co-worker.
- Use the emergency telephone numbers to request assistance and transportation to the local hospital emergency room.
- Provide details for the completion of the incident report.

Automated External Defibrillators (AED) are available onsite in the event of sudden cardiac arrest. An AED is only to be applied to victims who are unconscious, or unresponsive, and not breathing normally. Certain employees have been certified in AED use and should be contacted immediately in the event a co-worker is in need of the AED. AEDs are located in wall-mounted cabinets in the following locations:

- Plant [REDACTED]
- Plant [REDACTED]

8.5 FIRST-AID TRAINING

Certain employees have been certified in First Aid. If you do not feel comfortable assisting a co-worker who is in need of first aid, contact an employee who is certified. You are not required or obligated to help if you feel uncomfortable.

8.6 FIRST-AID INSTRUCTIONS

In cases requiring emergency medical treatment, immediately call or have a co-worker call to request emergency medical assistance. Use required bloodborne pathogen procedures while administering first aid.

Wounds:

Minor: *Cuts, lacerations, abrasions, or punctures*

- Wash the wound using soap and water; rinse it well.
- Cover the wound using a clean dressing.



Major: *Large, deep, and bleeding wounds*

- Stop the bleeding by pressing directly on the wound, using a bandage or cloth.
- Keep pressure on the wound until medical help arrives.

Broken Bones:

- Do not move the victim unless it is absolutely necessary.
- If the victim must be moved, “splint” the injured area. Use a board, cardboard or rolled newspaper as a splint.

Burns:

Thermal (Heat)

- Rinse the burned area without scrubbing it and immerse it in cold water. Do not use ice water.
- Blot dry the area and cover it using sterile gauze or a clean cloth.

Chemical

- Immediately flush the exposed area with cool water for 15 to 20 minutes.

Eye Injury:

Small particles

- Do not rub your eyes.
- Use the corner of a soft, clean cloth to draw particles out or hold the eyelids open and flush the eyes continuously with water.

Large or stuck particles

- If a particle is stuck in the eye, do not attempt to remove it.
- Cover both eyes with a bandage.

Chemical

- Immediately irrigate the eyes and under the eyelids with water for 30 minutes.

Eyewash stations are kept throughout the facilities, in the following locations:

■ Plant ■



■ Plant ■



■ Plant ■



Neck or Spine Injury:

- If the victim appears to have injured his or her neck or spine, or is unable to move his



or her arm or leg, do not attempt to move the victim unless it is absolutely necessary.

Heat Exhaustion:

- Loosen the victim's tight clothing.
- Give the victim *sips* of cool water.
- Make the victim lie down in a cooler place with the feet raised.

9. ACCIDENT AND INJURY INVESTIGATION

Accidents and injuries will be communicated to Management in a timely manner so that they can be investigated and documented. Management is responsible for gathering the information necessary to conduct a thorough and complete investigation. Investigations shall be documented on an Investigation Report form and may include the following:

- Interviews of involved parties
- Interviews of witnesses
- Scene diagrams
- Photographs, if consent is given
- Medical reports
- Equipment inspections
- Video review
- Review of training records
- Review of company policies or procedures

Additional information in the report will contain the cause of the injury or accident, a root cause analysis (if necessary), and corrective actions. The Safety Committee may meet to ensure that the investigation is thorough and the cause, root cause analysis, and corrective actions are completed. Incomplete investigations will be returned to Safety Management for further follow up with recommendations from the Safety Committee.

The completed report with findings will be presented to the employee's supervisor, Safety Management, Human Resources, Production Management, and Senior Management.

OSHA requires employers to report any/all of the following within 8 hours of the incident:

- Fatalities

OSHA requires employers to report any/all of the following within 24 hours of the incident:

- Amputation
- Loss of an eye
- A single incident which requires the hospitalization of 1 or more employees

OSHA CENTRAL TELEPHONE NUMBER: 1-800-321-6742

10. NEAR MISS

A Near Miss is an incident where no property was damaged and no personal injury sustained, but where, given a slight shift in time or position, damage and/or injury easily could have occurred. Research on near misses shows that numerous near misses occur before an actual accident happens. Providing employees with the tools and training to avoid accidents is part of the company's commitment to improving the workplace.

When an employee has been involved in or witnesses a near miss, they are strongly encouraged to report the near miss. Employees may communicate near miss incidents through direct reporting with their supervisor, completing a near miss report, or anonymously completing a near miss report. Near miss reporting will not be subject to disciplinary action or retaliatory behavior.

Management is responsible for fostering a culture which embraces safety and encourages reporting of near miss incidents. When near miss notifications are made without a written report completed by the employee, Management will complete a near miss report and forward it to the EHS Representative.

The EHS Representative will gather near miss reports and investigate the root cause. The root cause will determine the course of action to address the issue. Findings may be presented during production meetings, Management Review, or other regular mechanisms. Training based on those findings will be developed within a reasonable amount of time and presented to employees. Near misses will be traced until corrective actions are complete. Corrective actions will be evaluated by Safety Management for effectiveness after implementation.

Near miss reports will be kept for a minimum of one year from the date of the near miss.

11. RECORDKEEPING PROCEDURES

Human Resources will control and maintain the following records:

- Attendance/Training records – minimum of five (5) years
- Reportable injury documents (OSHA 300, OSHA 300A, OSHA 301) – in perpetuity
- Worker's Compensation Reports – in perpetuity

The Safety Department will control and maintain the following records:

- Incident investigation reports – minimum of five (5) years
- Facility inspection reports – minimum of one (1) year
- Safety committee meeting minutes – minimum of one (1) year
- PPE Hazard Assessments – minimum of seven (7) years
- External Safety Audit documentation – minimum of five (5) years
- Safety training records – minimum of five (5) years

CERTIFICATE OF ACKNOWLEDGEMENT

By signing this form, I acknowledge that I have received a copy of [REDACTED] Workplace Safety Program. I understand that it contains important information about [REDACTED] safety policies, that I am expected to read this Safety Program and familiarize myself with its contents, and that the policies in this Safety Program apply to me. I understand that nothing in this Safety Program constitutes a contract or promise of continued employment and that [REDACTED] may change the policies in this Safety Program at any time.

Employee's Name (Print)

Employee's Signature

Date

REVISION HISTORY

REVISION	SUMMARY OF CHANGES INCORPORATED
Original	N/A – New Document

END OF DOCUMENT