

Corporate Safety Policies and Procedures

Many companies involved in construction have written safety plans for individual safety topics, but few have an umbrella plan to summarize overall safety. This safety policy states EMA overall view of safety and the tenets of the safety program for our various construction sites.

In order to establish and organize good safety policies and procedures, this General Safety Policies and Procedures Written Plan summarizes information regarding safety policies and procedures at this company. The Project Manager for our site is responsible for implementing and maintaining this plan. The plan is kept at our Corporate office located at 10627 Midwest Industrial Boulevard, St. Louis, MO 63132 and with the Project Manager.

General Company Safety Philosophy Statement

This general company safety philosophy has been developed to reflect and communicate the proactive safety attitude maintained at this company.

The company will comply with appropriate safety and security laws and regulations such as those established by:

- The Occupational Safety and Health Act (OSHA),
- The EPA (Environmental Protection Agency),
- The DOT (Department of Transportation), and
- All other applicable federal, state, and local safety and health regulations.

In addition, our corporate safety philosophy includes the following vision statements:

- The company will comply with appropriate safety and security laws and regulations such as those established by OSHA, EPA, DOT, and all other applicable federal, state, and local safety and health regulations.

We believe that the safety of employees is of utmost importance, along with quality, production, and cost-control. Maintenance of safe operating procedures at all times is of both monetary and human value, with the human value being far greater to the employer, the employee, and the community. The following principles support this philosophy:

- All injuries and accidents are preventable through establishment and compliance with safe work procedures.
- The prevention of bodily injury and safeguarding of health are the first considerations in all workplace actions and are the responsibility of every employee at every level.
- Written safety plans describing the safe work practices and procedures to be practiced in all workplace actions are an essential element of the overall workplace safety program. All employees at every level are responsible for knowing and following the safety practices described in the written safety plans.
- Off the job, all employees should be similarly safe and demonstrate awareness of potential hazards.

Types of Written Safety Plans In Place

Because we care about our employees and strive to provide a safe work place, we have put into place a number of written safety plans. These written plans provide guidance and direction for the safety issues they cover when they apply. The topics covered in written safety plans at this company include the following and can be found in our safety and health manual:

- Accident Reporting and Investigation Plan
- Bloodborne Pathogens Program
- Compressed Gases
- Control of Hazardous Energy (Lock-out Tag-out)
- Corporate Safety Policies
- Electrical Safety Plan
- Emergency Action/Fire Prevention Plan
- Emergency Response Plan
- Ergonomics Program
- General Plant Safety
- Hazard Assessment
- Hazard Communication
- Housekeeping
- Medical Surveillance/First Aid
- Personal Protective Equipment
- Powered Industrial Trucks
- Scaffolding Safety
- Stairways and Ladders
- Welding and Cutting Safety
- Workplace Security Plan
- Jobsite Inspection Checklist

Employer/Employee Responsibilities

This section lists responsibilities of employers and employees. These responsibilities are to be taken seriously at all times.

It is the policy of this company to provide a place of employment reasonably free from hazards which may cause illness, injury, or death to associates. It is also this company's policy to establish an effective and continuous safety program incorporating educational and monitoring procedures maintained to teach safety, correct deficiencies, and provide a safe, clean working environment. All company supervisors, managers, directors, and officers are responsible for the enforcement of safety policies and practices. They must ensure that:

- Their staff members are trained in appropriate safety procedures, including chemical-specific training as required. Individual safety files are maintained in Personnel for all associates.

- They notify the Project Manager, and complete the necessary forms if an accident or work-related health problem occurs in their department.
- Equipment and property within their area of responsibility is maintained in a safe, hazard-free condition.

The employer's paramount obligation is to provide a safe and healthful work environment. This can be achieved through training and information-provision to all levels of employees regarding proper work practices and safe operating practices. Achievement of this goal is to be checked through regular inspections of facilities and equipment where unsafe conditions might be found.

All employees have a responsibility to themselves and to the company for their safety and the safety of the coworkers. All employees are required to:

- Comply with all federal, state, and local rules and regulations relevant to their work.
- Observe all company rules and regulations related to the efficient and safe performance of their work.
- Integrate safety into each job function and live by this philosophy in the performance of job duties.
- Report or correct unsafe equipment and practices.
- Report any accidents that occur while on the job.

Supervisory Responsibilities

To get the most of our safety program, each supervisor needs to fully recognize his or her responsibilities for safe working conditions and practices in their areas of responsibility.

The best methods are invariably safe methods. Getting employees to use the best methods requires each supervisor to whole heartily accept the following responsibilities.

- Know and actively enforce all company policies, rules, and procedures pertaining to safety.
- Detect and eliminate, or report for attention, all recognized hazards.
- Enforce the proper use and maintenance of machines, tools, equipment, and facilities.
- Enforce employees' use of protective clothing and equipment required for each job.
- Educate employees in the proper moving, handling, and storage of materials and equipment.
- Make regular and routine checks of workplace for unsafe actions, conditions, or practices.
- Insist upon good housekeeping and make frequent inspections.
- Make certain all employees are informed about job hazards and how to eliminate, control, or avoid them. Show the safe way to do the job and make frequent inspections for unsafe actions.
- Conduct continuous job specific safety instruction and training on hazard recognition.
- Insist upon immediate first aid for all injuries no matter how slight. Follow up to ensure appropriate treatment has been provided.
- Investigate every doctor needed and lost time case thoroughly and promptly. Accident reports must be made out for all such injuries.
- Attend and participate in all accident prevention meetings when assigned.
- Give constant feedback to employees on successes and failure of hazard reduction activities.

Failure to fulfill supervisory safety responsibilities will subject supervisors to our corporate safety and health disciplinary program policies.

Incentive Program

Our organization is fully cognizant of the fact that programs in writing are not as important as the programs, policies, and procedures actually being used as a standard practice. Management

realizes that for a program to be effective safety has to be given a top priority every day and for every evolution that takes place. To promote employee involvement and to keep our employees and project managers thinking "safe productivity" we have developed and incorporated a safety incentive program as part of our corporate safety policies.

Our program is designed to promote and encourage awareness of operations as they may relate root causes or contributing factors to injuries, illnesses, and or property damage. All near misses shall be investigated as well. Our program is also designed to award the many verses the few and specifically discourages employees from not reporting incidents or subject injured employees to harassment for experiencing an injury or illness.

Project Supervisors shall receive as part of their salary quarterly bonuses. These bonuses are based on compliance with safety our corporate safety plan, safety audits of the job site, safety performance of project employees, and profit margins associated with the job.

Employees shall receive monthly gift cards, certificates, or promotional items for a sum not to exceed \$25.00. The specific incentive shall be determined by the project manager. Should an employee experience a recordable injury, illness, or be responsible for property damage as a result of the employees failure to follow safe work practices or perform unsafe actions, the employee will forfeit his monthly incentive.

Additionally when an injury, illness, or property damage does occur all employees on the project will only receive an incentive in the amount of \$10.00 for that specific month. We firmly believe that the sum of \$25.00 will not discourage incident reporting, and the small reduction of incentive for other employees will still reward them for their heightened awareness, yet not be such that it will subject the subject employee to harassment.

We also remind all employees that it is a condition of employment work safely and follow all written procedures as outlined in our written safety & health program. Failure to do so will subject an employee to our disciplinary program.

Disciplinary Policy

All safety rules, procedures, and plans in effect at this company are intended to be followed. Upon violation of any company safety rule, the violating employee will be penalized. The list of possible disciplinary actions includes:

Verbal reprimand:

An informal discussion of the incorrect behavior that should take place as soon as possible after the supervisor has knowledge of the safety misconduct.

Written reprimand:

A written form documenting the safety misconduct, to be presented to the employee and placed in the employee's personnel file.

Warning of probation:

A written form documenting the safety misconduct and warning the employee that another incident will lead to probation, to be presented to the employee and placed in the employee's personnel file.

Probation:

A trial period during which the employee is given specific rules and goals to meet, during which, if he or she cannot meet the rules and goals, he or she is subject to termination.

Warning of suspension:

A written form documenting the safety misconduct and warning the employee that another incident will lead to suspension, to be presented to the employee and placed in the employee's personnel file.

Suspension:

A period of time during which the employee is debarred from the function of attending work and during which the employee is not paid.

Dismissal/termination of employment:

The permanent separation of an employee from the company, initiated for disciplinary reasons, safety misconduct.

Certain circumstances warrant disciplinary action.

Upon violation of any company safety rule, the violating employee will be penalized. The severity of the penalty will be in direct correlation to the severity of the safety violation.