

Safety and Loss Prevention Program

Policy Statement

It is the policy of _____ to ensure a safe and profitable workplace for all our personnel. To accomplish this policy, we will have an active, progressive, and effective safety and loss prevention program designed to protect all personnel from occupational injury and illness, and equipment from loss or damage. We realize that our most valued asset is our employees and your safety is of utmost importance to our business. In pursuit of this policy, all management and staff will be guided by the following safety and loss prevention program.

Goals

The overall goal of our safety and loss prevention program is to prevent on the job injuries and illnesses. Therefore, safety and health will be an integral part of our business philosophy and your daily work performance. To accomplish this, the following goals have been established:

- X To have all management and staff involved in the development, implementation, and maintenance of our safety and loss prevention program.
- X The determination for the need of a Health and Safety Committee consisting of both management and staff personnel.
- X Development of systems and programs that are specifically designed to meet our safety and health needs.
- X Implementation of an ongoing safety and health training program for management and staff personnel.
- X Communicate to management and staff their safety and health responsibilities.
- X To conduct a comprehensive baseline safety and health audit of our facility.

Objectives

The following are objectives that will be undertaken to achieve health and safety excellence:

NOTE: In the objectives below, insert realistic completion dates and individuals assigned to accomplish the task.

- X The Health and Safety Committee will be established by _____ and will consist of both management and staff personnel.
- X The Health and Safety Committee will complete the written safety and loss prevention program by _____.
- X A comprehensive safety and health survey of the facility will be completed by _____ to determine compliance with applicable federal and state safety and health regulations.
- X The safety and loss prevention program will be communicated to all management and staff personnel by _____.

- X A Job Hazard Analysis (JHA) will be conducted for all potentially hazardous work operations and the analysis process will be completed by _____.
- X The safety and loss prevention program will be reviewed at least _____ by the Health and Safety Committee. The program will be reviewed to ensure its effectiveness and to determine if the desired goals and objectives have been achieved. Changes will be made to the program as needed with approval from _____.
- X Insure that management and employee personnel know and accept their safety and health responsibilities.
- X Staff members will be trained to conduct periodic in-house inspections so they can recognize potential workplace hazards by _____.
- X Supervisors will be trained by _____ so that they will be able to conduct prompt accident/incident investigations.
- X Initial training for management and staff personnel will be completed by _____.
- X Emergency action procedures will be developed and implemented by _____.

Safety and Health Responsibilities

The importance of having all management and employees understand their safety and health responsibilities cannot be overstated. To ensure that you know and understand your role in our safety and loss prevention program, the following responsibilities have been developed for each job description at our company:

Chief Executive Officer/Owner/President/CEO

- X Oversees the development, implementation, and maintenance of the safety and loss prevention program.
- X Provides the active leadership and adequate resources necessary to maintain an effective safety and loss prevention program.
- X Develops and assigns safety and health responsibilities to management personnel.
- X Holds management personnel accountable for their safety and health responsibilities.
- X Sets a good example by following required safety and health rules and practices.
- X Reviews accident reports.
- X Ensures that a reliable system is in place for employees to report conditions or situations that they believe are potentially hazardous.

Plant Manager

- X Provides the leadership and positive direction necessary for maintaining the safety and loss prevention program.
- X Holds all subordinate supervisors accountable for their assigned safety and health responsibilities.

- X Actively participates in and supports employee participation in the safety and loss prevention program, and follows up on recommendations made by supervisors, employees, or safety committee.
- X Ensures that Job Hazard Analysis are performed on all potentially hazardous operations.
- X Ensures that employees know about and use the hazard reporting system.
- X Ensures that prompt action is taken whenever hazards are identified, or unsafe acts are observed.
- X Makes sure all potentially hazardous tasks are covered by specific rules or procedures to minimize risk.
- X Provides and ensures that required personal protective equipment is properly used and maintained.
- X Ensures that all accidents are promptly reported, thoroughly investigated and properly documented.
- X Keeps abreast of accident and injury trends that occur.
- X Keeps abreast of federal and state safety and health regulations applicable to the workplace that may affect accidents, illnesses and injuries in the workplace.
- X Makes sure that all supervisors and employees receive safety and health training.
- X Helps develop and implement emergency procedures.

Supervisors

- X Set a good example for employees by following required safe work practices and by wearing personal protective equipment.
- X Supervise and evaluate employees= safety and health performances.
- X Keep knowledgeable and up-to-date on safety and health requirements.
- X Be adequately trained to identify safety and health hazards.
- X Conduct Job Hazard Analysis.
- X Investigate accidents and near-miss incidents to determine their root-cause.
- X Actively discourages all potentially hazardous A short cuts@ undertaken by employees.
- X Consistently and fairly enforce safe work procedures and rules.
- X Provide continuing on-the-job training in safe work procedures and enforce personal protective equipment use.
- X Makes sure each employee knows what to do in the event of an emergency.
- X Ensure that appropriate record-keeping is maintained.
- X Involved in preliminary hazard analysis for new equipment, processes, and design changes.

Employees

- X Be familiar with the safety and health accident prevention program, to abide by all safety and health rules, work practices, and regulations.
- X Use all required safety devices and personal protective equipment.

- X Perform their work tasks in a safe manner and not to take unsafe shortcuts.
- X Maintain their work area in a clean and neat condition.
- X Conduct daily inspections of their immediate work area to look for unsafe conditions.
- X Report any and all injuries to their supervisor.
- X Know what to do in the event of an emergency.

Safety and Health Coordinator (where required)

- X Serves as an advisor to management on safety and health concerns.
- X Keeps current on safety and health regulations and current practices.
- X Serves as chairman of the safety and health committee (where required).
- X Conducts safety and health training.
- X Investigates accidents and near miss incidents.
- X Conducts in-house inspections.
- X Performs trend analysis using safety and health records.
- X Informs management personnel of potential safety and health problems.
- X Involved in preliminary hazard analysis of new equipment, processes and design changes.

Purchasing Agent

- X Employees involved in the purchasing of equipment will receive safety and health awareness level training. This training will assist them in an initial effort to identify potential hazards in design phase.

Safety and Health Performance Accountability

As stated in our company policy, safety and health has been given top priority because it is good for business and for the well-being of our employees. We expect all employees to participate in our program. In fact, your participation in this program is part of your annual performance evaluation. The success of our program is dependent on every individual knowing and practicing their safety and health responsibilities. Management and employees who disregard their safety and health responsibilities will be held accountable as stated as follows:

First Infraction

- X Verbal Warning
- X Retraining by immediate supervisor on safety and health responsibilities and/or how to perform task safely

Second Infraction

- X First Written Warning
- X Retraining by immediate supervisor on safety and health responsibilities and how to perform task safely

Third Infraction

- X Second Written Warning
- X Retraining by immediate supervisor on safety and health responsibilities and ow to perform task safely

- X Plant Manager and Director of Human Resources will be notified

Fourth Infraction

- X Third Written Warning
- X Retraining by immediate supervisor on safety and health responsibilities and how to perform task safely
- X Counseling meeting with immediate Supervisor, Plant Manager, and Director of Human Resources

Fifth Infraction

- X Termination

NOTE: A malicious or extreme safety infraction can result in more severe corrective action including immediate termination with no verbal or written warnings. Any written warning will remain in an individual=s personnel file for one year from the date of occurrence.

Safety and Health Training Program

Training is an essential tool for our entire staff to reduce their risk of experiencing a workplace accident and injury. Managers, supervisors, and employees need to be able to recognize, understand, and avoid potential hazards to themselves and to their co-workers. The Plant Manager is responsible for ensuring that all managers, supervisors, and employees receive the training necessary for them to perform their jobs in a safe and healthful manner. is responsible for determine safety and health training needs, providing training, and assessing the effectiveness of the safety and health training program.

Managers will receive the following safety and health training:

- X Their safety and health responsibilities.
- X The goals and objectives of the safety and health program.
- X Hazard awareness level training on safety and health issues pertinent to the facility.
- X Accident prevention techniques.

Supervisors will receive the following safety and health training:

- X Their safety and health responsibilities.
- X Detection of hazardous conditions and recognition of unsafe work practices.
- X Accident investigation procedures.
- X Conducting Job Hazard Analysis.
- X Conduct on-the-job safety training.
- X Emergency procedures.
- X Proper use, limitations, and maintenance of Personal Protective Equipment.
- X Safety and health regulations pertinent to the work operation(s) they supervise.
- X Record-keeping requirements.

Employees will receive the following safety and health training prior to performing any work task:

- X Orientation Training.
- X Their safety and health responsibilities.
- X Specific On-The-Job training for the job task(s) they perform.
- X Training on the proper use, limitations, and maintenance of PERSONAL PROTECTIVE EQUIPMENT.

Safety and Health Committee (where required)

_____ has established a committee consisting of management, employees, and the safety coordinator. The committee will assist in the development, implementation, and periodic evaluation of our safety and health activities. Members will be rotated periodically at staggering intervals to allow for maximum involvement and increase safety awareness. Meetings will be held the first _____ of every month at _____ o'clock. All committee members are expected to attend. The committee will be responsible for the following tasks:

- X Review of existing safety and health rules and procedures to ensure that these rules are current, pertinent, and being followed.
- X Provide suggestions for employee training.
- X Review all accident reports to determine its root cause.

- X Audit the results of all safety inspections conducted.
- X Review training programs with particular attention being given to training involved in the following areas:
 - X new or transferred employees.
 - X new safety and health regulations.
 - X new or modified procedures or processes.
 - X new equipment or chemicals.
 - X employees who perform Job Hazard Analysis.
 - X employees who conduct accident investigations.
- X Involved in preliminary hazard analysis for new equipment, processes, and designs.
- X Conduct periodic in-house safety inspections.
- X Provide recommendations to management on safety and health issues.
- X Evaluation of the safety and loss prevention program.

The safety committee will make their findings and recommendations available to _____.

In-House Safety Inspections Program

Safety inspections are an integral part of our accident prevention program. Inspections will be conducted for the following reasons:

- X Maintaining a safe and healthful workplace.
- X Recognizing unsafe work practices.
- X Identifying unsafe working conditions.
- X Increasing safety awareness.
- X Preventing injuries and illnesses.

Every individual has some responsibility for conducting safety and health inspections. Supervisors and employees will routinely conduct daily inspections of their immediate work area. Whenever possible, employees will promptly institute appropriate corrective measures. If the condition cannot be immediately corrected, the employee must notify their area supervisor. The employee can either orally inform the area supervisor or complete a Hazard Report Form contained on page ____ of this document. If the employee does not complete the form, then it is the responsibility of the supervisor to complete the form. A Hazard Report Form must be completed for all hazards that cannot be immediately corrected by the employee.

If the supervisor cannot immediately correct the hazard, the supervisor will develop an appropriate action plan for the correction of the hazard. Appropriate interim protection measures must be instituted if the hazard cannot be corrected immediately. _____ will be contacted if assistance is needed to determine the appropriate corrective measure and/or interim protection measures.

Monthly safety and health inspections will be conducted by our safety and health committee. When necessary, the committee will use the services of in-house personnel who have special knowledge of the manufacturing process, maintenance operations, electrical equipment, etc. The inspection checklist contained on page ____ of this document will be utilized by the committee for their inspection. The committee will also review the completed checklist during their monthly meetings. A copy of all completed checklists and corrective actions implemented will be forwarded to _____ for review.

Accident Investigation Program

The vast majority of accidents that occur in the workplace are preventable. Unfortunately, even with the best program accidents may still occur. The steps outlined here are means to ensure that the same type of accident does not recur. Accident investigations are to determine the facts and not to place blame on an individual.

All accidents must be reported to your immediate supervisor promptly. All accidents are to be investigated, even non-injury accidents are to be investigated by the immediate supervisor of the employee involved in the incident. An accident investigation team has been organized and will be activated in the following situation:

- X If the outcome of the accident resulted in a serious injury or the outcome could have resulted in a serious injury.
- X If the accident has occurred previously.
- X If numerous personnel perform the task involved in the accident.

Our Accident Investigation Team will consist of the following individuals:

- X Immediate supervisor of the injured or nearly injured employee.
- X Safety Coordinator _____.
- X Production Line Supervisor _____.
- X Maintenance Staff Member _____.
- X Production Employee _____.

Our accident investigation team will be trained on the fundamentals of conducting an effective investigation. Additionally, the Accident Investigation Worksheet on page ____ will be used for all accident investigations. A copy of the Accident Investigation Worksheet will be forwarded to the Safety Committee and _____ for their review.

Emergency Action Plans

This section will address our emergency action plans. Emergency action procedures will provide for an effective evacuation of personnel from our facility in the event of an accidental release of

hazardous chemicals or gases, fires, explosions, or natural disasters. An emergency action plan has also been developed in the event of a personal injury.

The Safety and Health Committee and Safety Coordinator (SC) (where required) are responsible for the development and evaluation of our emergency action plans. The SC and facility supervisors are responsible for implementation of the procedures.

Emergency evacuation routes and procedures have been posted in each work area of the facility. All new employees will receive initial training during their orientation. It is the responsibility of each supervisor to ensure that each employee under their control is trained and understands the correct procedures to follow in the event of an emergency.

(Name of Company) Emergency Action Plan

- 1) Safety Coordinator:
Telephone Number:

- 2) Procedures for Reporting Emergencies:

Type of Emergency

Procedures to Report

Fire

Chemical Spill or Toxic Gas Release

Personnel Injury

Other

3) Emergency Evacuation Routes and Procedures:

Emergency evacuation routes and procedures including locations of fire extinguishers are posted in each work area. If a copy is not posted, inform the supervisor of the area who will promptly provide a new copy. Supervisors must ensure that all employees in their work area have been trained on the routes and procedures to follow.

NOTE: Appendix M is a copy of an Emergency Evacuation Routes and Procedure Worksheet.

4) Employee Accountability after Evacuation:

Each supervisor is responsible for ensuring that all employees under their supervision are accounted for after an evacuation. Each employee must report to a predetermined location to verify their evacuation from the facility. These locations are designated on each posted evacuation route worksheet. The supervisor may perform this verification either personally or by a designee. All supervisors will then report the headcount to the Safety Coordinator.

5) Procedures for Employees Who Remain to Perform Critical Operations Prior to Evacuation:

6) Warning System:

In the event of emergency evacuation, employees will be notified by the following alarm warning signals:

7) Evacuation Drills:

Evacuation drills will be conducted _____ times per year. The Safety Coordinator in conjunction with Production Supervisors will schedule the drills. The Safety Coordinator will share the results of the drills with the Safety and Health Committee. In addition, the alarm system will be tested on the following frequency _____. Appendix N will be used to evaluate the emergency evacuation drill.

8) Special Fire Protection and/or Chemical Spill Procedures:

-
-

Medical Services Program

_____ is responsible for the overall implementation and maintenance of the Medical Services Program. The Medical Services Program consists of the following elements:

- X On-Site Medical Services
- X Off-Site Medical Services
- X Training
- X Program Evaluation
- X Record-keeping

On-Site Emergency Medical Services

In the event of a personal injury, the following on-site medical services are provided at our facility. On all shifts personnel who have received training on basic first aid skills will be available by contacting _____. These individuals will receive basic first aid training from _____. On a(n) _____ basis.

Other Types of On-Site Medical Services Provided:

Off-Site Emergency Medical Services

In the event that advanced emergency medical treatment is required, personnel are instructed to contact _____ at _____. If hospitalization is necessary, the employee will be taken to _____ by _____ ambulance services. Notifying an injured employee's family member will be performed by _____.

Physical Examinations

All employees are required to have a pre-employment examination prior to being assigned to work duties. The examinations will be performed by _____. Employees who are required to wear a respirator or hearing protection will also be examined by _____. All employees working in or passing through production areas are required to wear safety glasses. Prescription safety glasses will be provided according to the following policy:

_____.

Back to Work Program

Our facility has established a back-to-work program to assist employees recovering from an injury. _____ will serve as the contact person for this program.

Program Assessment

Our Medical Services Program will be evaluated on a(n) _____ basis to ensure that it is meeting the needs of our facility. _____ is responsible for performing this assessment.

Exposure Assessment and Monitoring

An exposure assessment will be performed by _____ to determine which job tasks will require baseline monitoring. If monitoring for chemical or physical hazards is necessary, it will be performed by _____. Additional monitoring will be performed to verify that the control measure instituted is effective.

Exposure monitoring will be performed using methodologies that are consistent with National sampling protocols. Where available, analysis of industrial hygiene samples will be performed by a laboratory accredited by the American Industrial Hygiene Association. The results of the monitoring will be maintained as part of our record-keeping program.

Ergonomics and Back Injury Prevention Program

_____ will be responsible for the implementation and maintenance of this program. This program is in place to minimize the chances of employees developing cumulative trauma disorders (CTD=s) such as:

- X Carpal Tunnel Syndrome
- X Tendinitis
- X Back Problems

The program will consist of the following elements:

- X Review of Injury and Illness Records
- X Workplace Analysis (included as part of the Job Hazard Analysis)
- X Hazard Prevention and Control Measures
- X Training
- X Medical Management

X Program Evaluation

Motor Vehicle Safety Program

_____ is responsible for the overall Motor Vehicle Program.

The following procedures have been implemented to reduce the risk accidents and injuries while operating a vehicle on company business:

- 1) Operators must have a valid driver license.
- 2) Operators must comply with all traffic laws and must be courteous to other drivers.
- 3) Operators are required to attend a company provided driver safety training course. Training will be provided as follows _____.
- 4) Operators must promptly report any accidents they are involved in, moving violations received, or suspension of license to their supervisor.
- 5) Drivers with poor driving records will be subject to retraining, counseling, and/or disciplinary action. Each employee who routinely operates a motor vehicle on company business will make their driving records available to the Motor Vehicle Program Coordinator upon request. These records may include:
 - X Status of driver's license
 - X Operating and moving violations
 - Accidents
 - X Medical restrictions
- 6) Operators are required to properly maintain their company vehicles and have them inspected annually. Our vehicle maintenance procedures are as follows:

—

Preventive Maintenance Program

_____ is responsible for the implementation of the preventive maintenance program. Those employees involved in the maintenance program will be given training to allow them to effectively perform their assigned duties. This training will be provided as follows:

—

The maintenance program will involve the following subjects:

- X Equipment and Machinery

- X Portable Power Tools
- X Housekeeping
- X Means of Egress
- X Fire Prevention

Contractor Safety and Health Program

_____ is responsible for the implementation of the Contractor Safety Program and will serve as a liaison person with all contractors. All contracts will include a provision stipulating the contractors= safety and health responsibilities.

_____ will provide information to the contractor on the hazards and safe working procedures in place for the area(s) they will have access. Each contractor will be responsible for training their employees on applicable safety and health requirements.

_____ will verify that the contractor has provided training to their employees by _____.

Additionally, each contractor will be responsible to report all injuries, illnesses, and accidents that occur on our property to _____.

_____ will conduct periodic safety and health inspections of each contractor=s work activities. If a contractor=s operation is found to contain safety and health inadequacies, _____ will be notified and will provide the necessary resources. _____ will inform the contractor or his/her designee of deficiencies noted and request prompt correction of the condition.

Personal Protective Equipment Program

_____ is responsible for the overall implementation of the Personal Protective Equipment Program. _____ will perform a hazard assessment for Personal Protective Equipment needs for each job task in our facility. The employer will verify that a needs assessment has been performed and that training on the use, limitations, and required maintenance has been conducted.

Employees are required to wear Personal Protective Equipment for the job task they performed if stated by your supervisor. _____ is responsible to ensure that the Personal Protection Equipment is properly used. Enforcement of these requirements will be consistent with established disciplinary policies. Replacement Personal Protective Equipment can be obtained by contacting your supervisor.

Record-keeping

The following records will be kept by _____ at _____.

- X Orientation Safety and Health Training
- X Job Safety Analysis
- X Accident Investigation Reports
- X OSHA 200 - Injury and Illness Log
- X Workers= Compensation Claims or OSHA 101 Form
- X Safety and Health Training Records
- X Exposure and Medical Records
- X Annual Fire Extinguisher Inspections
- X In-House Safety and Health Inspection Records
- X Completed Safety and Health Program Evaluation Worksheets
- X Disciplinary Action Letters
- X Employees= Personnel File

_____ will review all records as part of an overall evaluation of our safety and health program.

Master copies of the following required written programs will be kept by _____ at _____. Copies of these written programs can be obtained by _____.

- X Emergency Action Plan and Fire Prevention Plan
- X Respiratory Protection Program
- X Hazard Communication Program
- X Hearing Conservation Program
- X Lock Out/Tag Out Program
- X Bloodborne Pathogen Program
- X Confined Space Program
- X Chemical Hygiene Plan

Accident and Injury and Illness Trend Analysis

At least annually a comprehensive trend analysis will be performed by the employer. The employer will review the following information to determine if a pattern exists that has not been detected by other in-place safeguards:

- X OSHA 200 Injury and Illness Log
- X Workers= Compensation Claims and/or OSHA 101 Log
- X Accident Investigation Reports
- X Employee Complaint Forms
- X Hazard Reports

If deficiencies are discovered, the employer will develop and institute corrective procedures using established protocol.

Program Evaluation

The Safety and Loss Prevention Program will be audited _____.
_____ will perform the Program Evaluation. The goals, objectives, and program elements will be evaluated to determine if they are meeting their intended purpose. To determine this, the audit will consist of the following:

- X Interviews with a cross section of management and hourly paid personnel.
- X Review of records and reports.
- X Observation of job tasks and an inspection of the facility.