



# **INJURY & ILLNESS PREVENTION PROGRAM**

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*Operating in California, Nevada, and Arizona*

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## **Management's Safety Policy Statement**

We have every desire to provide for our employees a safe working environment. Employees are expected to use proper work procedures as well as the safety equipment provided. Strict compliance will be stressed. It is not the intent of this program to address all safety issues which might be encountered, but, rather to provide an overview of major safety concerns. Noncompliance with our policies and programs may result in suspension and/or termination.

The joint cooperation with our employees and management in observance of this policy will provide safe working conditions, accident-free performance, and will be to the mutual advantage of all.

## **Management Participation**

Management's participation in the safety programs is vital to its success. Two basic management functions are planning and controlling. Management's participation will include:

1. Communicating management interests to all employees.
2. Providing realistic amounts of time and money for safety items and complying with developed recommendations for safety.
3. Assigning accountability for the overall program to one individual: our Safety Coordinator. This individual will maintain the authority and responsibility to obtain program compliance and enforcement.
4. Include necessary allocations for accident prevention requirements and items necessary for the protection of employees.

## **Responsibilities**

### ***Responsible Person***

We have designated Brett Padelford as our Safety Coordinator who has the responsibility to ensure overall implementation of the IIPP. In addition, Superintendents have the responsibility for enforcement of the program in their work areas. Management will oversee these positions for accountability in enforcing the safety policies and procedures and afford equipment and training for employees.

### **The duties of our Safety Coordinator:**

1. Ensure that employees receive training programs on general and specific safety and health practices for the company and their job assignments.
2. Ensure that there is a procedure for communicating to employees, in an understandable manner, our safety and health rules and procedures.
3. Ensure compliance with safe and health work practices.
4. Ensure that records on training, inspections and corrective measures are properly maintained.
5. Manage and maintain the company's safety programs.
6. Keep employees informed of changes or updates.
7. Act as a liaison between management and various outside companies/agencies.

8. Review any accident reports and see that recommendations are acted upon.

### ***Superintendent Responsibilities***

It is important to us that the managers make safety a priority. Pre-planning can help to prevent problems before they occur.

#### **The duties of our Superintendent:**

- Conduct yourselves in a manner that will make it apparent to our employees that you are interested in accident prevention as a part of your job.
- Follow all company policies and procedures.
- Maintain safe and clean work areas and document inspections.
- Keep in compliance with the applicable safety rules.
- Implement any corrective action that may prevent accidents from occurring or reoccurring.
- Ensure that safety meetings are being conducted and documented.
- Encourage safety suggestions from our employees and maintain discipline relative to safe work habits.
- Investigate accidents and ensure a written report is complete and submitted to the Safety Coordinator.
- Be constantly on the lookout for unsafe conditions and correct them.
- Attend and participate in safety meetings and safety trainings.

### ***Employees Responsibilities***

- Follow safe work habits and procedures.
- Remember that safety starts with you and to set a good example for your fellow workers.
- Cooperate with your manager in preventing accidents and keeping a safe and healthy work area.
- Take good care of company equipment and report unsafe or defective equipment to your superintendent.
- Help keep the work area clean.
- Read and follow company safety policies.

### **Employee Compliance/Disciplinary Policy**

Under our policies, all employees are required to follow company safety policies. When needed, employees will be provided with additional training and information, or re-training to maintain their knowledge. The discipline policy is intended to encourage employee compliance with our safety policies and procedures.

Although we reserve the right to discharge “at will,” we believe that employees found performing work in an unsafe manner that would endanger the employee or another employee shall be subject to discipline or termination by management.

The Safety Coordinator will determine the course of action best suited for the circumstances that occur in their work areas. The steps to be taken, at a minimum, shall include the following:

- **Verbal Warning** – As the first step in correcting unacceptable behavior, the manager shall review the pertinent facts with the employee. The superintendent will consider the severity of the problem, and the employee’s past performance. A verbal warning will be issued to the employee,

which will be documented by the superintendent. If necessary, the employee will be placed on probation.

- **Written Warning** – If the unacceptable performance continues, the next step will be a written warning. The written warning will clearly state the unsafe act/policy that was violated and steps the employee must take if it is to be corrected. Probation will be a part of the written warning. It may also include time off without pay. At the completion of the probationary period, the superintendent will meet with the employee to determine if the employee has achieved the required level of performance.
- **Termination** – The employee may be terminated if he/she does not improve his/her performance while on probation, or has violated another company safety policy within twelve months.

## **Communication of Safety and Health Matters**

The elements of our IIPP and all aspects of the safety and health programs shall be communicated in a readily understandable manner to all employees.

It is our policy to encourage all employees to report hazards existing in their work areas to their superintendent or our Safety Coordinator so that corrective action can be taken in a timely manner. No employee is allowed to work in any area that he/she feels is unsafe or unhealthy, they are to report this to their superintendent immediately.

Employees who report such conditions will not be disciplined nor will they suffer any reprisals due to their actions. Employees may also remain anonymous when reporting.

Employees shall be kept informed of the requirements of our companies IIPP through one or more of the following:

- Weekly jobsite safety meetings – A meeting will be conducted by our superintendent or site superintendent at least once a week.
- Quarterly safety meetings – Our Safety Coordinator or designee will conduct a safety meeting for all field personnel. These meetings will provide safety information and safety suggestions. Accidents/near misses will be reviewed and discussed with the means for prevention emphasized.
- Annual safety meetings – Our Safety Coordinator or designee will conduct a safety meeting for all field personnel. These meetings will provide safety information and safety suggestions. Accidents/near misses will be reviewed and discussed with the means for prevention emphasized.
- Training programs, postings, written communications, as well as verbal communications will be on going.

## **Identify and Evaluate Workplace Hazards**

The goal is to identify and evaluate unsafe work conditions and practices so that accidents, injuries, and job-related illnesses are minimized, if not completely eliminated. The principle approach to reducing accidents/injuries is through periodic scheduled and unscheduled inspections. Inspections will be conducted as follows:

- At a minimum on our jobsites the Project Superintendent will conduct documented safety and health inspections on a monthly basis and the site Superintendent weekly documented inspections.
- Visual inspections will be completed daily by both Project Superintendent and Superintendents in their work area/jobsite.
- Office inspections will be conducted quarterly by Brett or a designee.

- Whenever new substances, processes, procedures, or equipment are introduced to the workplace that represents a new occupational safety and health hazard.
- Whenever we are made aware of an unrecognized hazard.
- Input from safety meetings or superintendent.

### **Accident, Injury and Illness Investigations**

When accidents, injuries, or illnesses occur on the job which requires medical care, they will be thoroughly investigated by the Safety Coordinator.

An accident investigation form will be filled out completely. The investigation will determine at least the following:

- Who and what was directly involved in the accident;
- Who and what was indirectly involved in the accident;
- Where and when the accident occurred;
- The cause of the accident, if known;
- Steps/procedures to take to prevent re-occurrence, if known.

### **Methods and Procedures for Correcting Unsafe or Unhealthy Conditions, Work Practices**

All unsafe or unhealthy work conditions or work practices identified will be evaluated and corrected in a timely manner, as determined by the severity of the hazard. Under no circumstances will our employees be required to or permitted to work under conditions which pose a clear or imminent hazard.

Engineering controls will be used first to eliminate or minimize unsafe or unhealthy work conditions. If engineering controls are impractical or infeasible, administrative controls will be used. If engineering controls alone, or in combination with administrative controls cannot adequately minimize the hazard, personal protective equipment shall be used.

Problems that cannot be corrected immediately will be assigned to our Safety Coordinator to ensure completion of the corrective action. Once corrected, written documentation of the action taken will be obtained by our Safety Coordinator.

When an imminent hazard exists which cannot be immediately corrected without endangering employees and/or property, the following steps will be followed:

- Remove all potentially endangered employees;
- Provide employees responsible to correct the condition with necessary safeguards;
- Correct the problem; and
- Document corrective action and date corrected. The documentation will be completed by our Safety Coordinator or designee.

### **Training and Instruction**

All employees shall receive training and instruction in the following areas:

- General safety and health work practices;
- Specific instruction with respect to hazards unique to the job assignment.

- Upon hiring of new employees;
- To all employees given a new job assignment for which training has not previously received;
- Whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard;
- Whenever we are made aware of a new or previously unrecognized hazard.
- During safety meetings.

Training shall be provided by the Safety Coordinator or designee. Additional training shall be provided to superintendents to familiarize them with the safety and health hazards to which employees under their immediate direction and control may be exposed.

### **Maintenance of Records**

Our Safety Coordinator or designee will maintain appropriate records of steps taken to implement our safety program. These records will be available at normal business hours for inspection.

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|---|--------------|
| • New Employee Safety Orientation Forms, Disciplinary Actions, Safety Inspections, Safety Meetings, Trainings, Accident Investigations and OSHA Logs. | 5 Years min. |
| • Inventory of Hazardous Materials  | Forever      |
| • Employee Exposure/Medical Records   | Forever      |