

2.23.23

INJURY AND ILLNESS PREVENTION PROGRAM

MAKE PREVENTION YOUR #1 INTENTION.

The goal of the Injury and Illness Prevention Program (IIPP) is to prevent workplace injuries and illnesses before they occur. Keeping employee-owners safe on the job using a proactive process keeps them working and more productive. The IIPP meets the Occupational Safety and Health Administration (OSHA) requirement for every employer to establish, implement, and maintain a written IIPP.

Copies will be entered into the Company Safety Management System and made available to all employee-owners upon request.

RESPONSIBILITY

The Director of Environmental Health and Safety is the administrator of this program and has the required authority and responsibility for implementing the provisions of this program for the Company. All managers and supervisors are responsible for implementing and maintaining the IIPP in their work areas and for answering employee-owner questions about the Safety Management Program.

COMPLIANCE

Management is responsible for ensuring that all health and safety policies and procedures are clearly communicated and understood by all employee-owners. Managers and supervisors are expected to enforce the rules fairly and uniformly.

77 SAFETY FIRST WORK ENVIRONMENT

All employee-owners are responsible for using safe work practices, following all directives, policies, and procedures, and assisting in maintaining a safe work environment.

Our system of ensuring that all employee-owners comply with the rules and maintain a safe work environment includes:

- Informing employee-owners of the provisions of our IIPP.
- Evaluating the safety performance of all employee-owners.
- Recognizing employee-owners who perform safe and healthful work practices.
- Providing training to employee-owners whose safety performance is deficient.
- Disciplining employee-owners for failure to comply with safe and healthful work practices.

COMMUNICATION

The Company communicates with employee-owners about occupational health and safety in forms that are readily understandable to all and requires all workers to inform their managers about workplace hazards without fear of reprisal. This communication is achieved using the following:

- New worker orientation including a discussion of health and safety policies and procedures
- Review of our IIPP
- Workplace health and safety training programs
- Regularly scheduled safety meetings
- Posted or distributed safety information

HAZARD ASSESSMENT

The Company has implemented a program for hazard assessment in order to identify potential hazards within the Company and on jobsites. Hazard assessment is a daily responsibility of all of our supervisors. Whether it is daily excavation inspection, traffic control set-up, or working around underground utilities, hazard assessment is every front-line supervisor's responsibility. Hazard assessment may be conducted in any of the following situations:

- As part of the implementation of this IIPP.
- When new substances, processes, procedures, or equipment that present potential new hazards are introduced into our workplace.
- As part of our accident investigation and reporting process after occupational injuries and illnesses.
- When new, previously unidentified hazards are recognized.
- Whenever workplace conditions warrant an inspection.

FOR HIGH-HAZARD TASKS AND ACTIVITIES

COMPLETE A JOB SAFETY ANALYSIS (JSA) DOCUMENTING HAZARDS AND CONTROLS REQUIRED TO PERFORM TASKS SAFELY. IF YOU ARE UNSURE OF THE NEED FOR A JSA CONTACT THE SAFETY MANAGER.

HAZARD CORRECTION

Unsafe or unhealthy work conditions, practices, or procedures shall be corrected in a timely manner based on the severity of the hazards. In addition, hazards will be corrected when observed or discovered during any hazard assessment method.

- When an imminent hazard exists, which cannot be immediately abated without endangering employee-owner(s) and/or property, we will remove all exposed workers from the area except those necessary to correct the existing condition. Workers necessary to correct the hazardous condition shall be provided with the necessary protection.
- All such actions taken and dates they are completed shall be documented on the appropriate forms.
- Training to prevent situations that just resulted in the employee-owner working in a hazardous situation will be coordinated to prevent future similar situations.

ACCIDENT AND EXPOSURE INVESTIGATION

The Company is committed to protecting employee-owners from health and safety hazards in the workplace and requires that all incidents, injuries, and illnesses be immediately reported to management. Procedures for investigating workplace accidents and hazardous substance exposures include:

- Interviewing injured or affected workers and witnesses
- Examining the workplace for factors associated with the incident or exposure
- Determining root cause of the incident or exposure
- Taking corrective action to prevent the accident/exposure from reoccurring
- Documenting the findings and corrective actions taken

TRAINING AND INSTRUCTION

The Company ensures that all employee-owners, including managers and supervisors, have training and instruction on general and job-specific health and safety practices. Training is the responsibility of the Safety Department, managers, and supervisors to identify and provide additional training and instruction to employee-owners:

- As part of the implementation of this IIPP.
- At the time of their initial assignment and as required thereafter.
- When workers are given new job assignments for which training has not been previously provided.
- Whenever new substances, processes, procedures, or equipment are introduced to the work that potentially present a new hazard.
- Whenever the employer is made aware of a new or previously unrecognized hazard.
- To supervisors to familiarize them with the health and safety hazards to which workers under their immediate direction and control may be exposed.
- To all workers with respect to hazards specific to each employee-owner's job assignment.

Training requirements are referenced throughout the Safety Management Program for the specific hazards or processes to which employee-owners may be exposed. Training content includes topics such as:

- First aid procedures
- Hazard communication
- Bloodborne pathogens
- Personal Protective Equipment (PPE)
- Ladder safety
- Proper housekeeping
- Equipment and tools
- Lockout and tagout
- Fall protection
- Confined space
- Excavations

RECORDKEEPING

Documentation and records of hazard assessment inspections must be kept including:

- The person(s) conducting the inspection
- The unsafe conditions and work practices that have been identified
- The action taken to correct the identified unsafe conditions and work practices

Records of health and safety training for each worker, including the worker's name or other identifier, training dates, type(s) of training, and training providers must be documented.

All records and documentation outside of the ESS Safety Management System, if it exists and pertaining to this IIPP will be maintained for at least one (1) year.