



**Occupational Health & Safety Program**  
**"Safety Manual for All Employees"**

**Revised January 21<sup>st</sup>, 2025**

***Perficut Companies, Inc.***  
***Occupational Health & Safety Program***

1/21/25

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## **SAFETY AND HEALTH POLICY**

Safety is our top priority at Perficut. Every day we are committed to using equipment only when we have been properly trained, minimizing all distractions in everything we do, wearing appropriate personal protective equipment, observing all company and departmental policies and procedures, and doing whatever it takes to minimize the risk of work-related injuries and illnesses and the resulting human and economic loss.

Every employee is responsible for following all Perficut production and administrative safety rules and practices. We assume personal responsibility for our work areas, both at our corporate location and in the field. We demonstrate this by wearing the appropriate personal protective equipment (PPE), performing work assignments in a safe manner, correcting unsafe conditions and practices that we can control, and maintain cleanliness and good housekeeping. We speak up if we are asked to perform a task that we are not trained to do or require more guidance with, and we anticipate.

It is also our responsibility to immediately report all accidents, injuries, and symptoms of chemical exposure to the appropriate member of the management group. We report any unsafe conditions or practices to our supervisors. We make it a priority to know emergency procedures and our individual roles in the event of an emergency.

It is also our individual and organizational policy to take all necessary and responsible steps to comply with safety and health standards set forth in federal, state, and local laws and regulations. Employees are expected to participate wholeheartedly in all training opportunities required of them and apply the knowledge and skills acquired into their work duties. It is critical that everyone becomes familiar with the work environment around them each day, wear the appropriate personal protective equipment, become familiar with hazardous material labels, and exercise care when performing every task.

Therefore, to help ensure the safety and health of all company employees and to comply with relevant safety standards, Perficut has established a written Injury and Illness Prevention Program that is generally referred to as the Safety Program. Most of the concepts are written in the company's Safety Manual (this document) and various appendices that are department- or topic-specific.

The authority and responsibility to implement and maintain the Safety Program is delegated to the following groups and individuals: Safety Committee (and designated others from time to time), Operations Director, Compliance Manager, HAZCOM Team, and Chief Financial Officer.

Perficut management is personally committed to the continued improvement of our safety performance and will authorize the necessary programs to achieve this objective. We expect the full cooperation of every member of our team in our safety efforts and are confident we can count on our employees, service providers, and other business partners to help in this important company program.

### **Perficut Safety Vision:**

***Lead the nation's site management industry by striving to grow a valued partnership, where employee and public safety is our top priority.***

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## **POLICY: SAFETY PROGRAM RESPONSIBILITIES**

### **PURPOSE:**

To ensure that Perficut maintains an effective safety program, all management, supervisors, and employees will have and be held accountable for specific responsibilities where safety is concerned.

### **PROCEDURE:**

#### Safety Committee

1. Responsible for overall implementation of safety program elements and the provision of resources to ensure effectiveness.
2. Establishes periodic safety goals and objectives, including plans of action and assignment of responsibilities for ensuring their effective implementation.
3. Names a member of the administrative staff to serve as the minute-taking and administrative role as delegated by the Safety Committee chair.
4. Serves as the 'eyes in the field' to make sure all employees are observing safe work habits at all times. From time to time, this group may monitor or audit specific processes for their operational effectiveness with safety in mind.
5. May recommend sponsor and/or deliver safety training and health topics appropriate to address a general or specific need.
6. Reviews all Incident Reports (vehicle, property, and personal injury) to better understand the challenges with the workforce, identifies trends that could benefit from and to look for ways to work more safely.
7. Assumes an 'on-call' status when there is a significant threat of a hazard (i.e. tornado, chemical spill, etc.) and will be called into action if appropriate.
8. Sets an example in all matters of safety and health and stimulates interest and participation in the safety program.
9. Works closely with the insurance carrier's loss control team to identify topics or exposures that Perficut should be addressing.
10. Commits to developing a knowledge base about OSHA compliance. Advocates learning opportunity for increased awareness of OSHA standards throughout Perficut.

#### Safety Compliance – shared role between Operations Director and Compliance Manager

1. Responsible for monitoring the effectiveness of Perficut's Safety Program. Maintains records that support this effort as well as documentation from committee meetings, safety training events, and other activities that support Perficut's ongoing safety program.
2. Stays abreast of federal, state, and local standards and regulations, and recommends required new programs to Safety Committee and Chief Financial Officer.
3. Monitors effectiveness of company discipline and recognition programs. Ensures that employee concerns and suggestions are being successfully communicated to and addressed by the appropriate individual without fear of reprisal.
4. Monitors effectiveness of procedures for correcting hazardous conditions and work practices, and that corrective action is completed in a timely manner based on the severity of the hazard.
5. Tracks OSHA safety standards compliance other than injury activity. Responsible for the organizational record keeping of violations, citations, audits, and inquiries.
6. Audits all corporate safety and training programs to ensure federal and local required programs are in place, with suitable content, and presented to all employees that require the program. Ensures employee training records are current and being properly maintained.
7. Presents monitoring results to the committee to determine effectiveness and follow-up.

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### Chief Financial Officer

1. Primary contact for insurance and other risk matters.
2. Responsible for Incident Report investigations, notification to appropriate third parties, and follow-up records maintenance and Incident closeout.
3. Conducts ongoing analysis to identify trends, gathers useful data, and forwards appropriate content to the Safety Committee for consideration.
4. Prepares brief executive summary of safety-related subject matter that has occurred since the last Safety Committee meeting.
5. Prepares OSHA 300 Log to ensure that injuries are being properly recorded, and that the required back-up documentation is available. Ensures that the annual summary 300A is posted during the months of February to April each year. Responds to Bureau of Labor Statistics requests for injury/illness information.
6. Ensures that all required OSHA Injury and Illness Program documentation is retained for three years, and that OSHA 300 Log Summaries are retained for five years (plus current year.)
7. Communicates various safety concerns to Safety Committee, may from time to time broadcast a safety topic to all employees by group email, payroll Stuffer, etc. Emphasizes Perficut's zero tolerance policy for behavior that disregards safety policies and procedures while conducting new employee Orientation and when 'Back from Lay-off' sessions take place.
8. Must be OSHA-10 trained. OSHA-30 training recommended.

### HAZCOM Team

1. Responsible for the overall program implementation, management, and recordkeeping requirements.
2. Led by an employee Program Administrator who will report directly to the CFO and be responsible for this policy and program. All safety data sheets (SDS) evaluations, implemented control measures for chemical handling, PPE requirements and training will be coordinated under the direction of the Program Administrator in collaboration with Management. The Program Administrator will work closely with the CFO and Safety Committee to monitor the results of the Program to determine if additional areas of focus are needed.
3. Develops a list of all hazardous chemicals in the workplace and updates the list as necessary.
4. Obtains SDS for all hazardous chemicals on-site. See Sample in the Appendix section of this manual.
5. Complete a chemical hazard assessment for all hazardous chemicals on an annual basis.
6. Determine the appropriate PPE for all work tasks involving chemicals and communicate this to the Safety Committee or person designated.
7. Obtains and reviews SDS for new chemicals prior to using the chemical in the workplace.
8. Identifies where and how all SDS are stored (central location, distributed to outlying locations, etc.).
9. Ensures annual training (or refresher) is performed and documented for this Hazard Communication Program.
10. Verify that all contractors have a Hazard Communication Program.
11. Provides contractors with the hazard communication information necessary to safely complete their tasks.
12. Works with the Compliance Manager for an annual review of the Hazard Communication Program and documents results on the Hazard Communication Program Annual Evaluation Form.

### Each Department Manager

1. Ensures that supervisors receive adequate safety training to meet their responsibilities.
2. Is accountable for the health and safety of all employees within his or her department and actively supports the Hazard Communication Program.

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3. Maintains department-specific safety protocols. Sees to it that all subordinates are trained in and consistently observe all these policies and procedures.
4. Defines and enforces additional safety rules for staff and monitors the safety performance of subordinates and sees that they are held accountable for their safety responsibilities.
5. Reviews all accident reports completed by subordinates to ensure proper corrective actions have been taken.
6. Notifies the HAZCOM Program Administrator when new hazardous chemicals are purchased.
7. Ensures prompt corrective action is initiated to correct unsafe conditions and unsafe acts in a timely manner based on the severity of the hazard.
8. Conducts random, unannounced safety inspections of work areas. Reports written results to the Compliance Manager and takes corrective action as necessary.
9. When made aware of an imminent hazard, ensures exposed personnel are removed from the area, except those necessary to correct the existing condition, and that necessary safeguards are provided to employees who are taking corrective action.
10. Sets an example to other members of the team in all matters of safety and compliance and stimulates interest and participation in the safety program.

### Each Supervisor and Foreman

1. By personal example, communicates and demonstrates to employees the importance of working safely. Ensures that work procedures are properly followed amongst team.
2. Responsible for designing and delivering procedures for the team and observing those procedures.
3. Instructs less experienced employees on the hazards of the job or task that each employee will be assigned. Properly utilizes established safety orientation checklist and submits to HR upon completion.
4. Promptly investigates and completes the appropriate accident investigation report on all accidents or near-miss incidents to determine causes and corrective action(s) needed to prevent a recurrence.
5. Routinely makes safety observations and ensures prompt corrective actions are initiated to eliminate unsafe conditions and unsafe acts.
6. When made aware of an imminent hazard, ensures exposed personnel are removed from the area except those necessary to correct the existing condition, and that necessary safeguards are provided employees who are taking the corrective action.
7. Becomes knowledgeable of all company rules and regulations and enforces them as they apply to respective work areas.
8. Responds to all employee safety suggestions and concerns in a timely manner.
9. Wears and requires visitors to wear protective equipment in mandatory areas.

## **POLICY: CORPORATE SAFETY COMMITTEE**

### **PURPOSE:**

The Safety Committee is a year-round advocacy group of employees representing a cross section of departments and responsibility levels dedicated to the promotion of personal safety at Perficut. Its main objective is to involve employees and supervisors in a common effort for the continuous improvement of the Occupational Health and Safety Program.

### **SCOPE:**

1. The Safety Committee will be comprised of representatives from the various departments of Perficut. Members will serve on a rotational basis.
2. Participants may self-appointed or be recommended by others.
3. The Safety Committee shall meet monthly as well as on special request from the Executive team.

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4. The meeting agenda would typically include a review of all safety incidents currently active, all submitted Incident Reports, acknowledgement of new vehicles or types of equipment being introduced to the organization, as well as noting safety-related content recently presented to employees and opportunities that would be on the agenda as 'New' business along with pertinent items that have been submitted for consideration.
5. The Committee will appoint a chair who will serve until it makes sense to rotate to another manager (or above) level employee at Perficut. The chair is responsible for preparing the agenda and gathering whatever information is required to conduct the meeting effectively.
6. Meeting minutes will be posted in the breakroom common area. The written record of each meeting will be retained for at least three years.

### **RESPONSIBILITIES:**

The Safety Committee shall have the following specific responsibilities:

1. Reviews results of all worksite inspections, both scheduled and unscheduled.
2. Reviews investigations and basic causes of occupational accidents and incidents resulting in injuries, illnesses, or exposures to hazardous substances. Where appropriate, submits suggestions to management for the prevention of future incidents.
3. Reviews investigations of alleged hazardous conditions brought to the attention of any team member. When determined necessary by the committee, conducts its own inspections or investigations to determine remedial solutions.
4. Accepts and responds to employee safety suggestions. Sponsors programs and activities that support a safe work environment at Perficut.
5. Coordinates a safety inspection of the corporate facilities once a year.
6. Reviews and tracks the status of corrective actions generated by inspections, investigations, suggestions, etc.
7. Reviews the audit results of various elements of the Safety & Health Program to assure their implementation and training effectiveness. Recommends corrective action and ways to improve compliance.
8. Recommends new safety policies or procedures.

## **POLICY: COMPLIANCE WITH POLICIES & PROCEDURES**

### **PURPOSE:**

This policy outlines a procedure for encouraging and enforcing compliance with safety rules and practices, and to comply with federal and local safety standards. It also mentions consequences for violations or lack of regard for safe work practices.

### **SCOPE:**

All employees, service providers, and Perficut agents who are on-site in any capacity on behalf of Perficut will observe the policies identified in the Safety Handbook. Perficut staff are responsible for communicating the necessary safety information with those individuals who are not employees.

1. Basic Safety Guidelines are communicated to new hires and returning employees on a regular basis. These are found in the Employee Handbook as general guidance on appropriate safety-minded behavior at Perficut.
2. Employees failing to comply with Perficut safety rules or practices will be subject to disciplinary action up to and including termination. Other parties described above failing to comply will jeopardize their ongoing business relationship with Perficut for a period of at least one year from the date of the infraction.
3. The following are examples of safety related situations that may be cause for counseling, corrective action, or possible dismissal:



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- a. All accidents where an employee was noted to be breaking a safety practice or was not following the proper procedure due to a fault of his/her own.
- b. An employee having two or more accidents in a calendar year including similar or different accidents.
- c. An employee causes an accident with another employee due to an unsafe practice or rule violation.

### **RESPONSIBILITIES:**

1. Each employee in a supervisory role is responsible for monitoring the safety performance of his or her employees and is to respond immediately when a concern about safety performance exists.
2. Each employee in a supervisory role will also be responsible for:
  - a. Being role models for their employees.
  - b. Using positive reinforcement to recognize employee safe practices.
  - c. Immediately correcting observed unsafe behavior.
3. The Safety Committee is responsible for promoting safety incentive and recognition programs that have been approved by the executive team to help encourage and ensure compliance with new or existing safety practices/procedures.
4. Human Resources and the specific department are responsible for providing initial safety training to new hires and returning seasonal workers. All employees receive some form of safety refresher on an annual basis.

### **PROCEDURE:**

1. Anyone observing an employee in a poor safety practice, safety rule infraction, or displaying a general poor safety attitude should confront the employee and attempt to determine the reason for the problem.
2. If the cause/reason is due to inadequate training, the employee is to be trained or retrained as appropriate.
3. An employee engaging in an unsafe work situation will be reprimanded in an appropriate manner. Guidance is found in the Employee Handbook and mentioned here. If the severity of the infraction is significant enough, the situation may result in immediate termination. Under most circumstances, the following consequences will likely occur with documentation at all levels submitted for the employee's file:
  - 1st offense - documented verbal warning.
  - 2nd offense - written warning.
  - 3rd offense - suspension.
  - 4th offense - subject to discharge.
4. Any action taken, including retraining, should be documented, and placed in the employee's personnel file. The documentation taken will include date of occurrence, reason for action, action being taken, signature of employee's immediate supervisor and/or person authorized to take disciplinary action. The employee's signature and any comments from him/her should be included. If an employee signature is refused, it should be noted with the reason why.

## **POLICY: SAFETY RULES AND SAFE PRACTICES**

### **PURPOSE:**

It is Perficut's responsibility to support a safe work environment and provide personal protective equipment for your use because we are greatly concerned with your safety and health. It is your responsibility to take every precaution so that your actions will not lead to an injury to you or others, damage to Perficut property or property belonging to someone else.

### **SCOPE:**

The following safety rules have been formulated as a general guide to all employees for the prevention of accidents and injuries. It should be made clear that these rules do not constitute all the safety requirements in the facility. All established safety rules, regulations, and procedures will be uniformly applied and enforced by supervision. Disciplinary action may be taken when any of these safety rules or specific safety instructions



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are disregarded. A quick reference guide is also in the Employee Handbook. Here are a few of the most common work rules for all employees. Additional rules are at the discretion of the department managers.

1. **No Smoking:** Smoking is NOT permitted in Perficut vehicles, at any customer site, in any Perficut building, and anywhere else prohibited by law. The only designated smoking areas on Perficut property are in parking lots away from buildings.
2. **Horseplay:** Refrain from horseplay, careless behavior, and negligent actions. We don't want anyone to get hurt. Fooling around or "horseplay" is dangerous and a poor excuse for fun. It will not be tolerated at any time during the employees' workday. Horseplay includes any willful act which may startle or distract other employees.
3. **Personal Protective Equipment:** Personal protective equipment (safety goggles, glasses, eye shields, gloves, safety toe shoes or boots, long pants, long-sleeved shirts, reflective clothing or vests, hard hats, respirators, etc.) are required for certain jobs for your personal safety and must be worn when specified.
4. **Seat Belts and Harnesses:** The use of seat belts and harnesses are required according to safety guidelines and equipment warning labels. All front seat passengers and the driver are required to always wear seat belts in licensed vehicles.
5. **Follow Instructions:** Listening is the most important first step. If you are missing some key information and are unsure, ASK.
6. **Train, then Try:** DO NOT operate anything you have not been trained to use. Speak up if you have not been properly trained to perform a task or operate a piece of equipment. It demonstrates honesty and a high regard for everybody's safety. Follow all procedures and do not take shortcuts.
7. **Driving Distractions:** Do not operate portable devices while driving. This activity may also violate state or federal rules of the road. All passengers in a vehicle are to avoid always distracting the driver. If a cell phone is in use, it requires a hands-free device.
8. **Jewelry:** Jewelry is often a safety hazard in the workplace. Earrings, necklaces and badge lanyards, and bracelets are NOT to be worn in any production role. Wear a wristwatch at your own risk and if prohibited at a client site, use another means to check time. There are circumstances where federal or state regulation prohibits jewelry from being worn for safety reasons as well. The Jewelry policy will be strictly enforced.
9. **Firearms and Other Weapons:** Firearms and other weapons are NEVER permitted to be on the employee's person while at Perficut property, at any client site, at any business partner facility, or at any other establishment during the employee's workday. Firearms and other weapons are to remain securely always stowed in the employee's personal vehicle. A violation of this rule is grounds for disciplinary action up to and including immediate termination.
10. **Work Rules at Client Sites:** Work rules that are more rigorous at a client site than what are practiced at Perficut should always be observed unless there is an approved reason why this rule should not be followed.
11. **Safety Signs and Tags:** Safety signs and danger tags are used to warn employees and visitors of accident hazards. Disregard of safety signs, tags or operation of equipment that has been "locked" or "tagged" out is a serious offense and will not be tolerated.
12. **Safety Devices and Guards:** Employees are required to use the safety devices and guards installed on the machines and equipment they operate. They must not be removed or made inoperative except by authorized personnel.
13. **Do Not Operate Unless Authorized:** Only authorized persons are permitted to operate, repair, or adjust machinery and equipment assigned by supervision.
14. **Riding Lift Trucks:** Employees are not permitted to ride on or be raised up on forklift trucks unless a special safety platform has been provided. This situation should be very rare in QC's operations.
15. **Reporting Injuries:** Every injury must be reported promptly. A determination will be made by the **supervisor** or other designated individuals as to whether medical attention is required. An Incident

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Report is required to be completed even if no medical attention is required. This will help the supervisor to investigate and take immediate corrective action to prevent a similar accident.

16. **Reporting of Hazards:** Any unsafe conditions or unsafe practices of fellow employees must be reported immediately to a supervisor. Every employee must take safety seriously and report concerns to management.
17. **Proper Work Clothing/Apparel:** The appropriate Perficut uniform must always be worn. Each department has a clear definition of what is included in the 'appropriate uniform' code. Open-toed shoes are not permitted in production areas. Hair must be worn up off the shoulders, pulled-back or covered, when working around equipment.
18. **Housekeeping:** Employees are required to keep their vehicles, equipment, and production areas clean at all times. We take great pride in the appearance of our team, our vehicles, equipment, tools, and property. The properties where we perform our services will be left in better condition than when we arrived.
19. **Proper Lifting Techniques:** Always use the proper lifting technique. We subscribe to 'Help Required at 50'. Never lift anything unattended that weighs more than 50 pounds. Assist a member of the team who **attempts** to do this alone or find a piece of equipment that can help with the job. Lift with your legs to ease the burden.
20. **Compressed Air:** Do not use compressed air for cleaning off clothing unless the pressure is less than 10 psi. Safety glasses/goggles should be worn whenever using compressed air.
21. **Chemicals and Hazardous Substances:** Do not use any new chemical material without reading the label or consulting a SDS to see if there is any health or physical safety hazards. If you are not sure contact a supervisor. Refer to the spill containment policy for more information.
22. **First Aid:** Employees are never required to apply first aid or CPR to another person. However, the "Good Samaritan" premise is supported at Perficut. Employees can always apply first aid to themselves as appropriate.
23. **Emergency Evacuation Procedures:** Employees should know enough about the properties where they perform services as well as the corporate facilities to be able to determine how to move to a safe location or evacuate the premises in case of emergency.
24. **Respect the Dangerous Nature of Tools and Equipment:** There is potential to sustain or inflict personal injury in most workplace situations. Be careful. Treat all tools, equipment, and vehicles with respect. Report any damaged or broken items to your supervisor or the appropriate party as soon as possible.
25. **Proper Illumination:** All job site storage areas, first aid stations, refueling areas, and employee gathering areas will be furnished with the proper illumination to meet OSHA 1926.56. All motorized equipment will have working headlights and work lights. If the lighting needs repair or non-existent notify your supervisor.

## **POLICY: EMPLOYEE SAFETY COMMUNICATION**

### **PURPOSE:**

This policy outlines the manner in which safety-related topics will be shared at Perficut.

### **SCOPE:**

Communication is key to our effectiveness with EVERYTHING at Perficut. Employees learn about safety matters through the activities of the Safety Committee, by postings, and notices (posters in break rooms, emails, payroll stuffers, etc.), laminated sheets in vehicles, manuals, and documents available in electronic and paper form, through training opportunities, large or small group meetings, toolbox talks, etc.

### **RESPONSIBILITIES:**

The Safety Committee, Operations Director, Compliance Manager, Chief Financial Officer, and HAZCOM team are charged with publishing communications that impact the workforce as a while in public or large group formats. If a department manager, supervisor, or foreman shares safety information with co-workers, these documents or meetings should be brought to the attention of the Compliance Manager for review and/or archival purposes.

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### **PROCEDURES:**

#### Individual, Small, or Large Group Meetings

1. Safety communications will be shared from time to time, most likely in the form of a short team meeting or printed notice in the break room area. Personal contact between the supervisor (or designee) and individual employees to instruct or discuss safety topics related to the employee's work are powerful tools for developing a positive safety culture. They are continuing reminders that management is concerned about employee safety.
2. A signature sheet is always required of those attending a meeting where a safety-related topic is presented and should also include a brief description of the content or objective, date, time, location, and presenter. These are forwarded to Admin to be electronically filed.

Important: Keeping a record of personal contacts on safety rules and job procedures is necessary for several reasons. The record is a history of what has been discussed with an employee, on what dates, and by what supervisors. Such information is useful to establish the fact that a person has been properly instructed. Secondly, a record can be a tool to help decide future topics to discuss with the employee. Thirdly, they provide a record of training for statutory compliance requirements.

#### General Safety Meetings

1. Group safety meetings with all the supervisor's employees are another effective training tool and should be held at least monthly.
  - a. Topics should be chosen that are pertinent to the job safety or health of the group. Home safety topics may occasionally be used as well.
  - b. The meeting should include open discussions on the topic to ensure employee understanding.
  - c. It is also important to solicit suggestions from employees on means of improving their job safety.
2. All group safety meetings are to be documented with the date, department/group designation, topic, employees' names/signatures, name of the supervisor, and name of the presenter if other than the supervisor. Documentation is again important for purposes of OSHA compliance.

#### Written Communications

1. Written communication of safety and health topics, practices, or matters of interest will be used in certain situations particularly to convey important new or revised policies and procedures. Written communication should be kept as clear and concise as possible.
2. All communications should be dated and conform to company policy regarding such communications.

#### Bulletin Boards, Postings, and Vehicle Info

1. Postings that are general in nature (Footwear Policy, Uniform Policy, Safety committee Minutes, miscellaneous posters) will be posted in the common break area or in each vehicle (if appropriate). This is also where government postings such as the OSHA and Workers' Compensation required notices are located. A member of the Admin team is responsible for maintaining the bulletin board and its contents.
2. Emergency information is available in every Perficut vehicle to provide telephone numbers, maps, and directions to get to the nearest urgent care facility, emergency room, or drug screening location in the service area. It is EVERY employee's responsibility, regardless of whether the employee is eligible to drive a vehicle at Perficut, to become familiar with where these medical business partners are located.

## **POLICY: CONTINUAL MONITORING AND IMPROVEMENT**

### **PURPOSE:**

Following procedures, identifying opportunities for improvement, and monitoring compliance are fundamental to Perficut's safety program success. Hazard evaluations, scheduled inspections, and monitoring are essential to an effective safety program to identify and eliminate hazards, unsafe conditions, and work practices.

### **SCOPE:**

Safety is EVERYBODY'S business EVERY day. It is well-known that 'what gets monitored gets the employee behavior to modify'. Our common goal is for employees to model safe, conscientious behavior at all times, even when nobody is looking or monitoring is not taking place.

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### **RESPONSIBILITIES:**

The Compliance Manager coordinates regular Toolbox Talks throughout the year. These are communicated to teams through their department supervisors. All employees in the production department are required to attend. Topics may relate to PPE, general safety rules, new equipment, emergency procedures, and any other relevant topic designed to promote safe work habits.

Inspections will also be conducted to identify hazardous conditions and unsafe behaviors. The appropriate individual(s) will be assigned to the inspections and monitoring as required by each department's needs.

### **PROCEDURE:**

1. Supervisors should, as a general practice, make a daily, informal inspection of the area under their supervision for the purpose of detecting unsafe work practices and conditions.
2. At least once a year the Safety Committee will make a formal inspection of the facilities, including outside buildings and grounds.
3. The Department Manager should conduct a special hazard evaluation inspection whenever any of the following are introduced, added to production, etc. that may represent a new occupational safety and health hazard. This may be an informal inspection but should be brought to the attention of the Safety Committee if action needs to be taken.
  - New substances.
  - New equipment.
  - New processes.
  - New or unrecognized potential hazard.
  - New procedures.
4. All formal safety inspections will be documented. Informal daily inspections will be documented when hazards are noted that cannot be immediately corrected.
5. Safety inspection documentation will include the following information:
  - Date of inspection.
  - Name of inspector(s).
  - Description of unsafe conditions or work practices noted.
  - Description of corrective action taken or planned.
  - If corrective action is not taken immediately, the date corrective action is to be completed and the person responsible will also be noted.

A copy of the report will be submitted to the Compliance Manager within one week of the inspection for tracking of corrective action.

## **POLICY: EMERGENCY ACTION PLAN**

### **PURPOSE:**

To provide a systematic approach when responding to emergency situations and to minimize response time, confusion, and injury in an emergency. Special training sessions as part of the Toolbox Talk series or by some other means will be incorporated into the training plan.

### **SCOPE:**

Perficut employees may find themselves responding to emergency situations, in the path of a tornado or some other weather threat, or other unforeseen crisis situations during their time at work. The information presented here is a summary because it is impossible to know of all the situations that might require action.

### **RESPONSIBILITIES:**

Department Managers and the Logistics and Procurement Manager share the responsibility for scheduling (and status updating) of crew members at work sites. The Maintenance Team Coordinator and winter season Dispatcher monitor weather conditions and update employees accordingly through an email and text tree process. The site supervisor or foreman is responsible for the safety of the crew and is the most familiar with the site layout. It is his or her responsibility to see to it that the crew can vacate the premises or move to a place of safety with little or no notice. Any additional contact information will be provided by the immediate supervisor, with input from the Account Managers and the Safety Director.

### **PROCEDURE:**

It is not practical to attempt to draw evacuation maps for every single site. Instead, all employees are regularly reminded to pay attention to their surroundings each day and follow a buddy system of sorts. If an alarm is

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sounded, employees will vacate the area as soon as possible gathering as much of the job site tools and supplies with them as reasonably possible without jeopardizing their personal safety. Depending upon the nature of the emergency, the work area may need to be free from obstructions.

Several examples are provided here as guidance for appropriate responses. Toolbox Talk topics provide a more detailed training on these and other emergency response scenarios. If there is a fire, employees ARE NOT employed to fight fires, however, each company vehicle is equipped with a fully charged fire extinguisher that may be used to its full extent.

1. Severe summer weather, especially hail and tornados, is relatively common. Watch for tornado danger signs like dark clouds, a wall cloud, a cloud of debris, large hail, a funnel cloud, and roaring noise. Get out of a work site trailer and into a vehicle! If a sturdy building is available, go there instead. Keep all work supplies, tools, or equipment secured if NOT being actively used.
2. If a sturdy building is not available and a vehicle is your only option, keep your seat belt on and protect your face and head. If power lines and glass are in the area, drive away from them if possible.
3. If there is a lower area (like a ditch) available, abandon the vehicle and lie down in the ditch. Never park a vehicle under an overpass as they become wind tunnels.
4. If a tornado is imminent at the office or shop site, employees should move to the interior restrooms and break room area closing all surrounding doors. Tornado shelter information will be posted prominently at all locations.
5. Regardless of emergency type, the department manager or site foreman will be responsible for the accounting of all employees under their supervision.

**REPORTING AN EMERGENCY** - Medical emergencies, although infrequent, require all employees to be prepared and remain calm. Every crew is equipped with a company-provided telephone. The phone number to the corporate office is available on multiple sources in each company vehicle. In the event of a life-threatening injury, when it is obvious that an ambulance will be needed or in the case of fire, 911 is the first call. Then the employee contacts the office and department manager. When emergency responders arrive, all employees must clear the area with the most senior member of the team on-site at the time being the spokesperson on behalf of Perficut to medical authorities. The Employee Handbook describes in greater detail the steps for the follow-up paperwork.

**POSTING OF EMERGENCY ACTION PLAN** – All Perficut facilities will have the facility specific EAP posted in the employee common area. The mobile version is included in the Employee Emergency Booklet available in each company vehicle. All employees will review the plan at their initial onboarding and at various times of the year via company-wide safety meetings and department toolbox talks.

## **POLICY: HAZARD COMMUNICATION PROGRAM**

### **PURPOSE:**

Perficut is committed to the prevention of chemical exposures that may result in injury and/or illness. Supervisors are charged with making sure that their teams understand the information concerning the dangers of all known hazardous chemicals used at Perficut and to see that employees comply with required PPE and procedures regarding the safe handling and use of chemical hazards. This program outlines how Perficut conducts its business regarding the safe use of hazardous chemical substances.

### **SCOPE:**

The Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (HCS) 29 CFR 1910.1200 (General Industry) and 29 CFR 1926.59 (Construction Industry) call for the development of a hazard communication program when employees may be exposed to any chemical in the workplace under normal conditions of use or in a foreseeable emergency.

In 2012, OSHA revised the HCS to align with the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). As a result, this program has been revised to comply with the requirements of the OSHA HCS 2012.

The written hazard communication program will include and address the following criteria to satisfy the minimum requirements of the OSHA HCS 2012:

- List of all hazardous chemicals known to be present in the workplace or individual work area



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- Methods used to ensure that all containers are labeled, tagged, or marked properly
- Methods used to obtain and maintain Safety Data Sheets (SDSs)
- Methods used to provide employees with information and training on hazardous chemicals in their work areas
- Methods used to inform employees of the hazards of nonroutine work practices

The hazard communication program will identify the following:

- Key personnel responsible for the program
- Locations of chemical inventory list and SDSs
- Workplace labeling system
- Good work practices and procedures to minimize exposures
- How training will be performed
- Procedures to maintain the program and update the required information
- How records will be maintained

### **RESPONSIBILITIES:**

Management supports implementation and ongoing monitoring of an effective chemical hazard safety program. A management-level employee with significant experience in chemical handling is designated as the HAZCOM Program Administrator whose role is as follows:

- Reviews the potential hazards and safe use of chemicals
- Develops and maintains a list of all hazardous chemicals and a master file of SDSs
- Ensures that all containers are labeled, tagged, or marked properly
- Provides guidance for new hire orientation safety training as well as periodic refresher training for the ongoing workforce
- Completes an annual chemical hazard assessment for all hazardous chemicals used.
- Coordinates the maintenance of training records
- Recommends appropriate PPE selection and care for all work tasks involving chemicals
- Directs the cleanup and disposal operations of spill response teams
- Identifies hazardous chemicals used in nonroutine tasks and assesses their risks
- Communicates with clients the potential of any hazards
- Periodically reviews the effectiveness of the hazard communication program
- Collaborates with Production Managers when new chemicals are purchased.

Employees are responsible for the following aspects of the Hazard Communication Program:

- Identifying hazards before starting a job
- Reading container labels and SDSs
- Notifying the supervisor of torn, damaged, or illegible labels or of unlabeled containers
- Using controls and/or PPE provided by Perficut to minimize exposure
- Following instructions and warnings pertaining to chemical handling and usage
- Properly caring for PPE, including proper use, routine care, and cleaning, storage, and replacement
- Knowing and understanding the consequences associated with not following company policy concerning the safe handling and use of chemicals
- Participating in training

### **PROCEDURE:**

1. Chemical Inventory List – maintained by the HAZCOM Program Administrator. Copies of the chemical inventory list are found by the Shop and on the shared drive. The list will contain the product identifier that is referenced on the appropriate SDS, the location or work area where the chemical is used, and the PPE and precautions for each chemical product. This list will be updated annually and whenever a new chemical is introduced.
2. Labels and Other Forms of Warning - required information on each container includes Product identifier, Signal word, Hazard statement(s), Pictogram(s), Precautionary statement(s), and name/address/telephone number of the chemical manufacturer, importer, or other responsible party.
3. Perficut will use the GHS labeling system for secondary containers. When a chemical is transferred from the original container to a portable or secondary container, the container will be labeled, tagged, or marked with a GHS label containing the Product identifier, Signal word, Hazard statement(s), Pictogram(s), and Precautionary statement(s).

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Portable containers into which hazardous chemicals are transferred from labeled containers and that are intended for the immediate use of the employee who performs the transfer do not require a label. If the portable container will be used by more than one employee or used over the course of more than one shift, the container MUST be labeled. Food and beverage containers should NEVER be used for chemical storage.

Signs, placards, process sheets, batch tickets, operating procedures or other such written materials may be used in lieu of affixing labels to individual, stationary process containers if the alternative method identifies the containers to which it is applicable and conveys the information required for workplace labeling.

Workplace labels or other forms of warning will be legible, in English, and prominently displayed on the container or readily available in the work area throughout each work shift. If employees speak languages other than English, the information in the other language(s) may be added to the material presented if the information is presented in English as well.

4. Safety Data Sheets (SDSs) will be obtained and maintained for each hazardous chemical in the workplace. The content of SDSs for each hazardous chemical will be readily accessible by telephone call to Perficut during each work shift to employees when they are in their work areas. A list of all SDSs with key information will be maintained in every licensed vehicle in the Perficut fleet.

SDSs will be obtained from the chemical manufacturer, importer, or distributor. The name on the SDS will be the same as that listed on the chemical inventory list. The HAZCOM team will update the master electronic file and physical SDS binders with the new and/or updated SDSs. If there is a problem obtaining an SDS from the chemical manufacturer, importer, or distributor, by any reasonable means (phone, email, internet research at product site), a phone call will be made to request an SDS and to verify that the SDS has been sent.

5. Employees included in the hazard communication program will receive the following information and training prior to exposure to hazardous chemicals and when new chemical hazards are introduced to their work areas:
  - a. Requirements of the OSHA Hazard Communication Standard 29 CFR 1910.1200 (General Industry) or 29 CFR 1926.59 (Construction Industry)
  - b. Operations in the work area where hazardous chemicals are present
  - c. Location and availability of the hazard communication program, chemical inventory list, and SDSs
  - d. Methods and observations used to detect the presence or release of hazardous chemicals in the work area, such as monitoring devices, visual appearance or odor of hazardous chemicals.
  - e. Physical, health, simple asphyxiation, combustible dust and pyrophoric gas hazards as well as hazards not otherwise classified of the chemicals in the work area
  - f. Measures employees can take to protect themselves from hazards, such as appropriate controls, work practices, emergency and spill cleanup procedures, and personal protective equipment to be used
  - g. Explanation of the labels received on shipped containers
  - h. Explanation of the workplace labeling system
  - i. Explanation of the SDS, including order of information and how employees can obtain and use the appropriate hazard information.
6. A member of the HAZCOM team and immediate supervisor of an employee performing a nonroutine task are responsible for ensuring that adequate training has been provided to the employee on any hazards associated with the nonroutine task. Employees share in this responsibility by ensuring that their immediate supervisor knows that a non-routine task will be performed.
7. If outside contractors are involved in a project working with or on behalf of Perficut, it is the Project Manager (or equivalent) who is responsible for confirming that the contractors understand the following:
  - a. Location and availability of the hazardous chemical list and how to obtain SDS information
  - b. Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area
  - c. Describe the labeling system, including the labels with the single words, hazard statements, precautionary statements, and pictograms
  - d. Physical and health hazards of the chemicals in the work area and where this information can be found on the chemical label and SDS



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- e. Measures employees should take to protect themselves from these hazards, including specific procedures the employer has implemented to protect employees from exposure to hazardous chemicals, such as appropriate work practices, emergency procedures, and PPE to be used
  - f. Details of the Hazard Communication Program, including an explanation of the SDS and how employees can obtain and use the hazard information
  - g. Periodic requirement for employees to perform nonroutine tasks that may involve hazardous materials and the information given to them before starting work by their supervisor regarding the potential exposure hazards
8. Records Retention Policy – all hazard communication training and program review records will be retained for a minimum of 10 years following the calendar year in which the event took place. All SDSs will be archived and retained indefinitely according to federal, state, and local guidelines.

## **POLICY: PERSONAL PROTECTIVE EQUIPMENT (PPE)**

### **PURPOSE:**

To ensure the greatest possible protection for employees in the workplace, the cooperative efforts of both employers and employees will be used in establishing and maintaining a safe and healthy work environment. Specific requirements for PPE depend upon the work to be performed. This policy addresses some considerations to determine the need and selection of safety gear at Perficut.

### **SCOPE:**

All production employees and anyone in or near the active work area where PPE is required must follow the guidelines. Many categories of PPE must meet or be equivalent to standards developed by the American National Standards Institute (ANSI). PPE is provided to employees at no cost to them. PPE may be provided by the employee. All employee-owned PPE used in the workplace will be inspected to ensure that it conforms to company standards based on the hazard assessment, OSHA requirements, and ANSI standards. Four types of PPE are mentioned in this Policy: 1) Eye and Face Protection, 2) Head Protection, 3) Foot and Leg Protection, and Hearing Protection. These and other types are discussed in department-specific training and through Toolbox Talks.

### **RESPONSIBILITIES:**

The employer is responsible for identifying the appropriate PPE for the task at hand, certifying that a hazard assessment has been done and by whom, and communicating such information to members of the team. Perficut will provide PPE items required for all scopes of work. The supervisor is responsible for regularly inspecting PPE brought to the work site for use and to see that the PPE is stored and maintained according to recommended guidelines. If replacement and/or disposal is necessary, this is coordinated through the supervisor and safety manager. Failure to wear the appropriate PPE will result in disciplinary action according to the Employee Handbook.

Employers are required to train each employee who must use PPE on at least the following five subjects: WHEN PPE is necessary, WHAT PPE is necessary, HOW to properly put on, take off, adjust and wear the PPE, LIMITATIONS of the PPE, proper care, maintenance, inspection, useful life and disposal of damaged or defective PPE. This is facilitated through the Safety Committee and Compliance Manager. Re-training will occur if there is reasonable suspicion that an employee is not adequately trained or found to not be using the required PPE.

### **PROCEDURE:**

1. Eye and Face Protection – many occupational eye injuries occur because workers are not wearing eye protection while others result from wearing improper or poorly fitting eye protection. Everyday use of prescription corrective lenses will not provide adequate protection, so protective eyewear that incorporates the prescription or goes over the glasses is necessary. Appropriate eye protection will have the ability to protect against specific workplace hazards, fit properly and be reasonably comfortable to wear, provide unrestricted vision and movement, be durable and cleanable, and should allow unrestricted functioning of any other required PPE. Examples include safety spectacles, goggles, welding shields, laser safety goggles, and face shields.
2. Head Protection – A hard hat is the most effective type of PPE to prevent head injuries for employees. It is management's responsibility to ensure that employees wear the appropriate head protection if objects might fall from above or if workers might bump their heads against fixed objects. In limited circumstances a bump cap/hat is an acceptable alternative. Class C hard hats provide lightweight comfort and impact protection but offer no protection from electrical hazards. This is the type most likely to be required

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for tasks at Perficut. Bump caps are designed for use in areas with low head clearance where head lacerations or bumps might occur. These are not designed to protect against falling or flying objects and are not ANSI approved. An ANSI approved helmet will bear a label inside the shell that lists the manufacturer, the ANSI designation, and the class of the hat. Protective helmets or hard hats should resist penetration by objects, absorb the shock of a blow, be water-resistant and slow burning, and have clear instructions explaining proper adjustment and replacement of the suspension and headband. Hard hats must have a hard-outer shell and a shock-absorbing lining that incorporates a headband and straps.

3. Foot and Leg Protection – Employees who face possible foot or leg injuries from falling or rolling objects or from crushing or penetrating materials should wear protective footwear. Typical kinds of footwear include leggings, metatarsal guards, toe guards, combination foot and shin guards, and safety shoes. Safety shoes have impact-resistant toes and heat-resistant soles. This footwear protects feet against hot work surfaces and puncture wounds. Metatarsal guards are strapped over the boot to protect the instep area from impact and compression.
4. Hearing protection – Exposure to high levels of noise can cause permanent hearing loss. Short term exposure to loud noise can also cause a temporary change in hearing. Wearing ear plugs or earmuffs are the most common PPE used at Perficut. If you hear ringing or humming in your ears when you leave work or must shout to be heard by a coworker at arm's length away or experience temporary hearing loss when leaving work, you need to take action. If half the day is spent in an environment where 85 decibels (85 dBA) of sound is the norm, hearing protection is mandatory. A heavy truck sound is usually 80 – 90 dBA. A jackhammer is an example of a dBA in the 90's. Any time you are operating power equipment or machinery, hearing protection is mandatory.

## **POLICY: ERGONOMICS**

### **PURPOSE:**

Ergonomics is the study of people and their interaction with the elements of their job or task including equipment, tools, facilities, processes, and environment. Perficut policy is to provide an ergonomically sound work environment to maximize employee comfort and minimize the risk of undue physical stress.

### **SCOPE:**

When aspects of the work or workplace exceed the body's capabilities, the result is often a musculoskeletal disorder (MSD). The exposure to doing too much of the same thing in a short amount of time. It should not be confused with body fatigue. However, this is a practical body signal that making a change to the task at hand may be in order.

### **RESPONSIBILITIES:**

Every employee owns this issue. Pay attention to how much of the same activity you are doing throughout the day. Make periodic adjustments accordingly so that the same task and tools can be interchanged with another relevant activity. Supervisors should be cognizant of the repetitive routines of their crew members and rotate duties as reasonably possible.

### **PROCEDURE:**

1. Pay attention to physical risk factors such as posture, fatigue, repetition, contact stress, extreme temperatures, and vibration, work pace, lack of training, noise, glare, personal protective equipment, and clothing.
2. Set task priorities and distribute the repetitive duties over time or workers to minimize the chance for repetitive stress or strain injuries and repetitive motion injuries. Simply put, break up the routine whenever possible!
3. Train and remind staff to pay attention to body signals and be responsible for their actions. Tell a supervisor if a rotation needs to be considered.

## **POLICY: TOOLS AND EQUIPMENT**

### **PURPOSE:**

The use of all tools and equipment at Perficut should be a safe practice. Nobody is assigned to use any manual or power tool or piece of equipment without an understanding of its features, limitations, and risks and the

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appropriate training to accomplish this.

### **SCOPE:**

Production and shop workers are most likely to be users of manual and power tools and various types of equipment and machinery. However, even passenger vehicles and office equipment are within the scope of this policy. Safety guards are provided at the point of operation, to protect the user from rotating parts, and to prevent flying chips and sparks from harming the user and others. Safety switches, momentary contact 'on-off' control devices, and constant pressure switches will always be used appropriately and never tampered with.

### **RESPONSIBILITIES:**

Any time you use a tool, attachments, equipment, machinery, company vehicle, and other items that have potential to cause harm to you, others, or property if not used properly, it is your responsibility to make sure everything is in proper working order, undamaged, or tampered with. Any indication of damage will be immediately reported to the supervisor or other appropriate individual. ALWAYS protect yourself with the appropriate PPE for the task. Do not proceed if you are not prepared and know how to operate the tool safely.

### **POLICY:**

1. Five safety tips apply to the use of all tools and equipment. Keep all tools in good condition with regular maintenance. Use the right tool for the job. Examine all tools for damage before use. Operate according to the manufacturer's instructions. Always use the proper PPE for the task.
2. Hand tools can be non-powered and still pose a risk of injury if defective, malfunctioning, broken, or used for something other than their intended purpose. They can be used safely if inspected prior to use. Seek guidance as necessary to select the correct tool for the job.
3. Specialty tools such as those used for tree trimming and removal pose a significant risk. Make sure all cutting equipment is in good condition and guarding is in place. Verify chains are properly lubricated. Be mindful when working in the vicinity of power lines. Details about this type of activity are covered in special training and Toolbox Talks.
4. Power tools can be hazardous if improperly used. These types of tools can be electric, pneumatic, liquid fuel, hydraulic, and powder actuated. Electric tools should be operated within their design limitations. Gloves and safety footwear are recommended during use of electric tools. When not in use, tools should be stored in a dry place. Electric tools should not be used in damp or wet locations. Work areas should be well lit. Additional precautions are covered in regular Toolbox Talks.
5. Guards are essential to the safe operation of equipment. Belts, gears, shafts, pulleys, sprockets, spindles, drums, fly wheels, chains, or other reciprocating, rotating, or moving parts of equipment must be guarded if such parts are exposed to contact by employees.
6. Pneumatic tools can be dangerous because of their powerful air pressure, which can cause objects to fly at high speeds, and because they can be noisy. Here are some safety tips to keep in mind when using pneumatic tools:
  - Wear protective equipment
  - Wear safety glasses or a face shield, safety shoes or boots, and hearing protection. If you're using an air-impact wrench, you should also avoid wearing loose clothing, jewelry, or a tie, and tie back long hair.
  - Use screens and shields
  - If you're working in an area where others might be exposed to flying debris, dust, or noise, set up screens or shields to protect them.
  - Check the tool
  - Before using a pneumatic tool, make sure it's in good condition and has any safety features installed correctly. You should also review the user's manual to learn how to use the tool safely and how to take advantage of its safety features.
  - Don't carry by the hose
  - Avoid carrying or holding a pneumatic tool by its hose or connections, as this can put too much stress on the tool and lead to injury or early failure.
  - Don't point it at people
  - Be careful not to point the tool at yourself or anyone else nearby

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## **POLICY: HEAT AND COLD STRESS**

### **PURPOSE:**

Weather conditions are part of daily life at Perficut. In a matter of minutes extreme seasonal conditions could create situations that challenge the personal safety of members of our team in the field. This policy addresses some of the most common considerations.

### **SCOPE:**

Anyone working in a hot or cold environment could be at risk of heat or cold stress. Some workers may be required to work outdoors in hot or cold environments and for extended periods. At Perficut that means winter season snow and ice management and summer season landscape services.

### **RESPONSIBILITIES:**

It is every employee's responsibility to know the signs and symptoms of heat and cold-induced illnesses and injuries and to plan accordingly before beginning a work shift and to be vigilant throughout the day or night as well as to and from work. Annual training and refresher Toolbox Talks address this subject.

### **PROCEDURE:**

Prevention and preparedness are very effective when addressing potential heat and cold stress risks. Employees at Perficut are trained and reminded regularly about these risks. Employees are encouraged to drink warm sweetened non-alcoholic beverages during snow events. During the summer, cool water is the preferred beverage. Workers should wear at least three layers of loose-fitting clothing in the winter. Wool, silk, and synthetic fabrics keep moisture away from the body. Hats or hoods are a must. Gloves should be insulated, and boots should be appropriate for the task at hand.

Heat Stress – usually manifests itself in the form of heat rash, heat cramps, unexplainable exhaustion, and heat stroke.

1. Risk factors include high temperature and humidity, direct sun exposure, no breeze or wind, low liquid intake, heavy physical labor, waterproof clothing, and no recent exposure to hot workplaces.
2. Symptoms typically include headache, dizziness, fainting, weakness, wet skin, irritability or confusion, thirst, nausea, and vomiting. In cases of heat stroke, the worker may be confused, unable to think clearly, pass out, collapse, or have seizures, and stop sweating.
3. The supervisor is responsible for the crew's well-being and monitoring the situation. Workers should all be equipped with an ample supply of drinking water and hydrate several times each hour. Schedules will be modified to minimize the risk of symptoms. New members of the team should be closely monitored. Encourage workers to wear lightweight, light colored, loose-fitting clothing.
4. If a worker is NOT ALERT, call 911 or transport them to the nearest medical facility.

Cold Stress – A cold environment forces the body to work harder to maintain its temperature. Whenever temperatures drop below 'normal' and wind speed increases, heat can leave your body more rapidly. Wind chill is the temperature your body feels when air temperature and wind speed are combined. Cold stress occurs by driving down the skin temperature and eventually the internal body temperature known as 'core temperature'. This may lead to serious health problems and may cause tissue damage and possibly death.

1. Risk factors include dampness in the air, dressing improperly, exhaustion, predisposing health conditions such as hypertension, hypothyroidism, and diabetes. Poor physical condition also plays a role.
2. As the body reacts to cold conditions, it will begin to shift blood flow from the extremities (hands, feet, arms, and legs) and outer skin to the core (chest and abdomen). This shift allows the exposed skin and the extremities to cool rapidly and increases the risk of frostbite and hypothermia.
3. Everybody in the work group needs to be especially vigilant during the winter months when extreme weather conditions exist. Visibility is challenged. Windows are frosted over in vehicles and equipment cabs.
4. Hypothermia may set in if the body temperature drops below 95° F. Shivering that was previously observed may begin to lessen or even stop. The worker may lose coordination. If any of the symptoms of hypothermia are evident, assist the worker to a warm, dry environment. Replace wet clothes with dry clothing and layers of blankets. Only leave the face exposed. If medical help is more than 30 minutes away, give warm sweetened non-alcoholic drinks. Place warm bottles or hot packs in armpits, sides of

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chest, and groin. Transport to an urgent care facility if necessary. If the situation worsens or if the worker is not responsive, call 911 for emergency medical assistance immediately.

5. Frostbite is an injury to the body that is caused by freezing of the skin and underlying tissue. Amputation may be required in severe cases. Skin may be red then develops gray/white patches. Numbness and blisters may also occur. Follow recommendations for hypothermia. Do NOT rub the affected area or apply snow or water to warm up the affected area. Do not break blisters. Transport to an urgent care facility.

## **POLICY: FIRST AID AND MEDICAL SERVICES**

### **POLICY:**

The following first aid and medical services procedure is provided to ensure that prompt and effective medical assistance is provided to Perficut employees and other people working on-site with or on behalf of Perficut in case of workplace injury or illness.

### **PURPOSE:**

This First Aid and Medical Services Procedure is designed to establish specific common guidelines for departments to follow in assuring that prompt medical attention is provided to employees suffering from either a work-related or non-work-related injury or illness. Each department manager is responsible for confirming that contact information for Perficut's risk manager or designee and first aid supplies are readily available during all work hours. Each company vehicle is equipped with information for non-emergency care in the major metropolitan areas where Perficut performs work along with emergency room directions. On a case-by-case basis, a contingency plan will be put in place when work is performed where no emergency services are readily available.

### **SCOPE:**

Access to first aid and emergency services applies to all company locations and client work sites and applies to all employees, visitors, vendors, and subcontractors.

Definitions that help clarify the parameters of First Aid and Medical Services are as follows:

FIRST AID means the following types of treatment:

- Using non-prescription medications at non-prescription strength
- Cleaning, flushing, soaking wounds on the skin surface
- Using wound coverings, such as bandages, Band-Aids, gauze pads, etc. or using 'SteriStrips' or butterfly bandages
- Using hot or cold therapy
- Using any totally non-rigid means of support, such as elastic bandages and wraps
- Using temporary immobilization devices while transporting an employee. Examples include splints, slings, neck collars, or back boards.
- Drilling a fingernail or toenail to relieve pressure, or draining fluids from blisters
- Using eye patches
- Using simple irrigation or a cotton swab to remove foreign bodies not embedded in or adhered to the eye
- Using irrigation, tweezers, cotton swabs, or other simple means to remove splinters or foreign material from areas other than the eye
- Using finger guards
- Using massages
- Drinking fluids to relieve heat stress

ILLNESS can be classified as a skin disease/disorder, respiratory condition, poisoning, or other illnesses resulting from an event in the work environment. Examples include:

- Contact dermatitis
- Eczema
- Silicosis
- Asbestosis
- Toxic inhalation
- Poisonings by lead, mercury, or other metals
- Poisonings by carbon monoxide, hydrogen sulfide, or other gases
- Poisonings by organic solvents or by other chemicals
- Heatstroke, sunstroke, heat exhaustion, or other heat-related factors
- Freezing, frostbite, or other cold-related factors



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- Effects of non-ionizing radiation (welder's flash or lasers)
- Bloodborne pathogenic diseases
- Microbial exposure

INJURY means any wound or damage to the body resulting from an event in the work environment. Examples include:

- Cut/laceration
- Puncture
- Abrasion
- Contusion/bruise
- Fracture
- Chipped tooth
- Amputation
- Insect bite
- Electrocution
- Thermal, chemical, electrical or radiation burn
- Sprain/strain injuries to muscles, joints, and connective tissues when the result from a slip, trip, fall or other similar accident

MEDICAL TREATMENT means managing and caring for a patient for the purpose of combating disease or disorder. The following activities are NOT medical treatment:

- First aid
- Visits to a doctor solely for observation or counseling
- Diagnostic procedures, including the administering of prescription medications that are used solely for diagnostic procedures

WORK-RELATED INJURY OR ILLNESS means an injury or illness resulting from an event or exposure in the work environment causing or contributing to the condition or significantly aggravating a pre-existing condition.

WORK ENVIRONMENT means work sites where one or more employees are present as a condition of their employment.

### **RESPONSIBILITIES:**

Employees are ultimately responsible for their awareness and conduct regarding first aid. It is everyone's responsibility to participate in the appropriate training for their specific roles at Perficut. Supervisors are strongly encouraged to model safe behavior and reinforce this with Toolbox Talks and on-the-job training. Employees at all levels of the organization are encouraged to improve their first aid and CPR skills and obtain certifications and special designations when provided with the opportunity.

The Chief Financial Officer is responsible for maintaining relationships with the appropriate medical facilities for non-life-threatening care as well as emergency care. This is communicated with facility names, maps, telephone numbers, and hours of operation. If 911 is NOT required for the specific medical situation, the first call should be to the supervisor. The call will be routed to the designated person who works in collaboration with the impacted employee, crew, supervisor, and manager to address the situation. Completing the appropriate Incident Report is a critical part of this process.

A member of the Safety Committee has been designated First Aid Liaison. They provide direction for health-specific training (i.e. first aid and CPR) opportunities at Perficut.

### **PROCEDURE:**

1. Reporting Injuries - All injuries, regardless of how small, must be reported to the employee's immediate supervisor and treated as soon as possible after an incident. If an employee becomes injured or ill anywhere due to a work-related or non-work-related problem and needs immediate medical aid, it must be reported to his or her supervisor or the safety manager. Failure to report minor injuries or to receive supervised medical treatment may result in serious infections or complications to the employee's health. If an employee declines First Aid and/or medical treatment for a reported on-the-job injury after the supervisor or other authoritative individual recommends it, the employee should NOT be allowed to continue work. Supervisors should discuss each situation with the safety manager before allowing that employee to return to duty.
2. First Aid and CPR Training –Perficut employees occasionally provide services in jurisdictions where it is not possible for trained medical personnel to arrive to the work site in four minutes or less. To address

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this situation, all full-time staff members are encouraged to obtain and maintain first aid and CPR certifications.

3. In addition, the entire workforce participates in mandatory first aid training on an annual basis with occasional personal health-related topics addressed throughout the year. When an employee comes into direct contact with blood, bodily fluids or body tissues of another person, there is a risk of infection with diseases that may be carried in the other person's body fluids. Because of the potential for exposure to bloodborne pathogens and significant liability concerns, there is NO JOB at Perficut that REQUIRES an employee to render first aid or CPR in the course and scope of their employment, unless such a requirement becomes necessary due to federal, state, or local safety and health regulations.
4. First Responders – An informal First Responder Program is evolving at Perficut and requires that its members all be first aid and CPR certified through the Red Cross, local hospital, etc. The Compliance Manager maintains the list of all such designated individuals. When appropriate, first aid and CPR will be administered by First Responders only to stabilize the employee until professional medical attention can be provided. All designated First Responders are trained to respect the risks of bloodborne pathogens and other health exposures.
5. Good Samaritan – Perficut supports any employee who chooses to act as a “good Samaritan” to assist a fellow employee or another person with first aid or CPR. It is Perficut's intent that first aid supplies and basic PPE against bloodborne pathogens be accessible to employees in every company vehicle and at the corporate sites during all shifts. A list of items found in vehicle first aid kits and at Perficut's first aid station at the Production break area can be found as an Appendix to this Handbook.
6. Bloodborne Pathogens Awareness and Training - If an employee makes the decision to provide first aid to someone, universal precautions shall be followed. It should be assumed that all blood and bodily fluids are contaminated with bloodborne pathogens. In addition, the employee should wear protective medical gloves and any other PPE available in the first aid kit to help avoid exposure to any contamination. If blood or potentially contaminated material gets on the skin, it must be washed off immediately using water and a non-abrasive soap. If available, antiseptic soap or rinse must be used. If blood ever gets in the eyes, lips, mouth or nose, the employee must go to a sink, water fountain, eye wash or body wash station and flush the area with running water as quickly as he or she can. Decontamination of exposed surfaces, tools, and equipment is the next step and must be done immediately. There is a vaccine for Hepatitis B. This must be discussed with a physician as soon as possible after potential exposure. Perficut includes Toolbox Talk “Universal Precautions” bloodborne pathogens training in its rotation of topics and is covered in the company's “Bloodborne Pathogens Plan”. Communicating basic information about these hazards, including information contained in this policy, is part of Perficut's safety and health program. Perficut will maintain all employee medical records related to bloodborne pathogen exposure for the duration of employment plus 30 years.
7. First Aid Stations and First Aid Kits – The breakroom area outside the Shop is designated as a First Aid Station and is readily available to employees. This area is suitable for drenching or flushing a body or eye injury. First aid kits are provided in all company vehicles and are inspected at least annually to replenish supplies. The list of required items is attached as an Appendix to this Manual.  
A third-party vendor conducts an annual inspection of the on-premises first aid kits and fire extinguishers. This is coordinated through the safety manager. A member of the Shop team also conducts the annual inspection of the vehicle first aid kits. During the year it is the responsibility of each department to replenish the supplies as necessary.
8. Transport of Injured Employee - When an employee is injured at work, the priority is to provide first aid or emergency medical attention. The best approach depends on the nature of the injury. If transport to a medical facility is required and the injured party is mobile, the employee's manager or direct supervisor must be immediately notified and will make the decision on who will transport the injured party to a health care facility. The injured employee should also stop work immediately to prevent further injury. If the injury is serious or the employee is not mobile a call to 911 for emergency transport will be required. It is the responsibility of the department manager to ensure an ambulance service is available or to arrange alternate transportation.



## **POLICY: CORRECTING UNSAFE WORK CONDITIONS**

### **PURPOSE:**

A procedure to assure that TIMELY corrective action is taken whenever unsafe or unhealthy conditions, work practices or procedures are observed or discovered is an essential element of any effective safety program.

**Important:** This procedure for correction and tracking of action taken to correct hazards applies regardless of the means for the reporting of the hazard, i.e., safety inspection, accident investigation, suggestion, or any other means by which the hazard is reported.

### **PROCEDURE:**

1. All employees will be trained in their roles and responsibilities in the stop work/reporting unsafe work conditions process by their department manager when first employed and then yearly afterward. This training will be documented in our training/safety platform.
2. Unsafe conditions and/or acts will be corrected as soon as possible. However, any serious or imminent hazards are to receive immediate attention.
3. If immediate correction is impractical, time specified for corrective action is to be appropriate to the severity of the hazard using the following guidelines: "Class A" – isolate or remove from service and repair or replace immediately, "Class B" – complete corrections within 30 days, and "Class C" – schedule corrections into routine maintenance schedule.
4. Hazardous conditions or procedures for which no corrective action can be determined will be brought to the attention of a department head for assistance in resolving action to be taken. When a serious hazard exists which cannot be immediately corrected without endangering employees and or property, the department head or designee will see that:
  - a. All exposed personnel are removed from the area except those necessary to correct the hazardous condition
  - b. Employees involved in correcting hazardous conditions are provided with the necessary safeguards.

### **Stop Work Authority (SWA) Process:**

#### **1. Stop**

When an employee perceives condition(s) or behavior(s) that pose imminent danger to person(s), equipment or environment he or she must immediately initiate a stop work intervention with the person(s) potentially at risk.

If the supervisor is readily available and the affected person(s), equipment or environment is not in imminent danger, coordinate the stop work action through the supervisor. The stop work action should be clearly identified as a stop work action and initiated in a non-combative manner.

Employees will not be penalized or singled out for retribution of any kind for initiating a SWA.

#### **2. Notify**

Notify affected personnel and supervision of the stop work action. If necessary, stop work activities that are associated with the work area in question. Make the area(s) as safe as possible by removing personnel and stabilizing the situation.

#### **3. Investigate**

Affected personnel will discuss the situation and come to an agreement on the stop work action.

If all parties come to an agreement the condition or behavior is safe to proceed without modifications, (e.g. the initiator was unaware of certain information or circumstances), the affected persons should show appreciation to the SWA initiator for their concern and then resume work. The SWA is complete at this point and no further steps are needed.

If it is determined and agreed the SWA is valid, a Stop Work Issuance Form will be completed. The condition(s) or behavior(s) that pose threats or imminent danger to person(s), equipment or the environment must be resolved before restarting work. Work will be suspended until a proper resolution is achieved.

#### **4. Correct**

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Modifications to the affected area(s) will be made according to the corrections outlined in the Stop Work Issuance Form. The affected area(s) will then be inspected by qualified experts to verify the completeness of the modifications and to verify all safety issues have been properly resolved. The completion of modifications will then be noted on the Stop Work Issuance Form.

### **5. Resume**

The affected area(s) will be reopened for work by personnel with restart authority. All affected employees and contractors will be notified of what corrective actions were implemented and that work will recommence.

In the event an employee still believes it is unsafe, they will be assigned to another job with absolutely no retribution.

### **6. Follow-Up**

Operations Managers will provide the root cause analysis to the stop work action and identify any potential opportunities for improvement. The Safety Manager will publish the incident details regarding the stop work action to all Operations Managers and employees outlining the issue, corrective action and lessons learned. Management will promptly review all stop work reports to identify if any additional investigation or follow-up is required.

## **POLICY: DRUG AND ALCOHOL POLICY**

### **PURPOSE:**

Safety sensitive work, widespread availability, and use of unauthorized, prohibited, illegal or controlled substances, and our commitment to maintain a drug free work force require pre-employment, post-accident, and unannounced periodic or random drug and alcohol testing of all employees. Additionally, all employees are placed on notice that all are subject to searches and inspections of their person, vehicle, and personal effects for the presence of unauthorized, prohibited, illegal or controlled drugs, chemicals or substances, alcohol, explosives, contraband, or firearms.

Any questions concerning the implementation or administration of this policy should be directed to the Chief Financial Officer who serves as Perficut's Privacy Officer and Risk Manager.

### **SCOPE:**

The Drug and Alcohol Abuse testing required under this program applies to all employees. Any employee determined to be in violation of this policy is subject to disciplinary action which may include termination, even for the first offense. Refusal of an employee to participate in the testing procedure will be assumed to be in violation. While this company understands that employees and applicants under a physician's care are required to use prescription drugs, abuse of prescribed medications will be dealt with in the same manner as the abuse of illegal substances.

Persons in safety-sensitive functions such as performing pre-trip/post-trip inspections or servicing powered vehicles, operating heavy equipment, automobiles, or trucks, loading, and unloading trailers, using power tools and machinery, applying chemical applications during the course of their workday, and driving company vehicles requiring a commercial driver license are in a position to exhibit very dangerous behavior if impaired due to drugs or alcohol. This is only a partial list.

Nothing in this policy will prohibit an employer, agent of an employer, or laboratory conducting a drug test from having access to employee drug-test information or using such information when consulting with legal counsel in connection with actions brought under or related to this section or when the information is relevant to its defense in a civil or administrative matter.

### **DEFINITIONS:**

Legal Drug – prescribed drug or over-the-counter drug which has been legally obtained and is being used solely for the purpose for which it was prescribed or manufactured.

Illegal Drug - Any drug (a) which is not legally obtainable, (b) which may be legally obtainable but has not been legally obtained, or (c) which is being used in a manner or for a purpose other than as prescribed.

Refer to the appropriate Appendix for the list of substances and levels tested and a list of over the counter and prescription drugs that have potential to alter or affect drug test results.

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### **RESPONSIBILITIES:**

Candidates who have accepted a contingent job offer are required to submit to a pre-employment screening. This is coordinated through Admin team during the onboarding process. Candidates who fail a drug screen or simply do not show up for it will not be hired but may reapply after one year.

All employees are responsible for their own behavior and are to report any physical signs or unusual behavior of a fellow employee that would lead a person to believe that a coworker may be impaired in some way. This should be reported to a supervisor, manager, or CFO.

Class A Commercial Driver license holders will be placed in Perficut's drug and alcohol testing consortium through a third-party provider engaged to administer the program according to best practices and guidelines established by the Department of Transportation.

All employees will be subject to unannounced drug and alcohol testing. This test will be without cause, suspicion, detectable performance problems, or the occurrence of an accident, incident, or safety violation. If an employee's name is drawn who is on a job-attached seasonal layoff with snow responsibilities, he or she may be required to submit to a drug screen in conjunction with a snow event recall. Required screening as part of eligibility to work at a particular client site will be in addition to the random screening process if there is no drug screen test result on file at Perficut within the previous six months.

Under no circumstances will an employee ever report to work with a blood alcohol concentration of 0.04 or greater, perform safety-sensitive functions within 4 hours after using alcohol, or use alcohol for 8 hours or until after being tested (whichever comes first) following an accident in which post-accident testing is required.

Supervisors are responsible for the safety of their teams and are expected to cooperate with the investigation and possible drug testing when an employee is involved in an on-the-job accident resulting in injury to him/herself or others, a serious or potentially serious accident or incident in which safety rules and precautions are violated, damaging equipment or property of the company or others, unusually careless acts, evidence that an employee has used, possessed, sold, solicited, or transferred drugs while on the employer's or client's premises or while operating company vehicles, machinery, or equipment, or when a client's policy requires it. This is not an all-inclusive list.

### **PROCEDURE:**

Searches, inspections, and drug screens will be performed in a professional manner with concern for the privacy and confidentiality of all individuals. The DOT consortium names selected are treated as personal and confidential and may be coordinated with the employee's supervisor to minimize disruption of duties, pick a collection day and time that is achievable, and yet preserve the 'random' nature of the policy.

In addition to the mandatory DOT screens, employees may be subject to drug and alcohol testing as a result of the following:

1. All active and job-attached lay-off employees are subject to random screenings and testing as a result of an accident, reasonable suspicion, or follow-up process. An employee who is otherwise on a seasonal layoff is considered in an active status the day immediately preceding a predicted snow event or the day immediately following.
2. If reasonable suspicion is the basis for a test, two people should observe the symptoms or behavior if possible before requiring testing. Employees who refuse substance testing under these circumstances will be subject to disciplinary action up to and including termination.
3. Some clients require random screening results to be on file (and sometimes submitted to the client before the employee is granted access to the property) for all employees who will be on-site, most commonly within the past six months. A random screening apart from the regularly scheduled screenings will occur for these employees. Perficut maintains a list of employees eligible to work at these client sites through the Compliance Manager and CFO.

Laboratory testing will occur at a company-designated facility performing substance testing on blood or urine specimens in accordance with standards set forth by the National Institute for Drug Abuse. Whenever possible, all specimen collection will occur at the facility. Employees may be asked by collection site personnel to indicate whether there is the potential that they will test positive for prescription or other substances. A consent form and information sheet will be provided.

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In the case of an accident after hours, a Quest Diagnostics DOT drug panel testing kit is available in the Admin offices. All CDL drivers are required to submit to a drug and alcohol screen if involved in a vehicle accident on a public roadway.

A visual one-step panel immunoassay for the simultaneous, qualitative detection of multiple drugs and metabolites in human urine may be used for the purpose of administering random, post-accident and reasonable suspicion drug screens in the field. However, this is not very likely to occur at Perficut. If this type of testing results in a positive reading, the specimen will be sealed, and a chain of custody form will be completed and sent to a NIDA certified lab for gas chromatography/mass spectrometry (GC/MS) analysis.

If the employee fails to provide an acceptable urine specimen, the company may take the following steps:

1. Extend the stay of the employee at the designated collection site, if feasible, until an acceptable specimen can be collected.
2. Reschedule the test due to unusual circumstances (i.e. post-operative situations)
3. Discipline the employee, up to and including termination, on the first offense for failing to cooperate or refusing to provide an acceptable specimen.

Testing results are forwarded to the CFO. If the results are negative, the appropriate record keeping process will occur depending on the purpose for the screen to begin with.

If the results are positive, this means that the employee has been made aware of the results and has had the opportunity over several days to consult with the MRO and provide necessary documentation prior to results being forwarded to Perficut. A CDL driver's results will be immediately forwarded to the DOT as required by federal law.

1. An employee's job is not in jeopardy by reason of his voluntary admission to having a substance problem and request for help and referral to an approved rehabilitation program, provided there has been no prior violation of this policy, and the employee has not previously been through rehabilitation while employed with Perficut AND further provided that such request is made prior to, and well in advance of, any consideration of being tested under the provisions of this policy.
2. The cost of any rehabilitation will be at the employee's expense. The employee will be placed on a one-time administrative leave without pay for no longer than 30 calendar days. Employees participating in this rehabilitation program will be subject to follow-up or 'maintenance' testing for a two-year period.
3. Under certain circumstances, disciplinary action in lieu of immediate termination may include a mandatory referral to and enrollment in an approved rehabilitation program at the employee's expense. This action may also require an indefinite suspension of regular employment.
4. An employee's first offense will result in random 'maintenance' testing at a random frequency for the next 24 months as a condition of continuing employment. This is in addition to being part of the random screening pool or CDL consortium. A second offense will result in immediate termination if occurring within two years.

All information, interviews, reports, statement memoranda, and drug-test results, written or otherwise, received by the employer through a drug testing program are confidential communications. A violation of confidentiality will be treated as a very serious offense subject to disciplinary action up to and including possible termination.

Employees or job applicants may confidentially report to the testing facility's medical review officer (MRO) the use of prescription or nonprescription medications both before and after being tested. Employees or job applicants who receive a positive confirmed test result may contest or explain the result to the MRO within three working days after receiving written notification of the test result. If the employee's or job applicant's explanation or challenge is unsatisfactory to the MRO, the MRO shall report a positive test result back to the employer.

## **POLICY: INCIDENT INVESTIGATION AND REPORTING**

### **PURPOSE:**

Incident Investigation is important to determine causes and to implement corrective action.

### **SCOPE:**

1. An incident investigation must be conducted for:

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- a. Any injury beyond first aid that happened to any party.
  - b. Incidents involving significant property or equipment damage. (i.e. usually involves a tow truck or property repairs estimated to exceed \$1,000)
  - c. Any injury or incident that has the potential for serious injury ("Near Serious" incident).
  - d. When a review of the first aid log indicates two or more minor injuries with the same identified cause or occurring to the same individual.
2. OSHA regulations require that the nearest OSHA District Office be notified by telephone within 8 hours of any fatality, or if 3 or more employees are hospitalized.
  3. Incident investigation reports will be used to develop injury statistics and analyses to assist Management in the improvement of its Safety and Loss Control Program.

### **RESPONSIBILITIES:**

The employee's supervisor is responsible for helping the employee complete the appropriate Incident Report. This report is filed within 24 hours of the Incident with the CFO who serves in the capacity of Perficut's Risk Manager. The Safety Committee and Compliance Manager will also be involved at some point in the process to analyze any ongoing threats to safe operations. All employees will be trained in their role and responsibilities during the onboarding process and annually via Companywide Safety Meetings.

### **PROCEDURE:**

1. Every work-related injury or property damage incident, regardless of its severity, must be reported immediately by the employee to his/her supervisor. If the incident happens on a client's property, the appropriate Account Manager will be immediately contacted by the supervisor, who in turn will contact that client within 24 hours of the incident.
2. For any injury requiring outside medical attention, or that has the potential for outside medical attention, the CFO or designee will complete and sign an Iowa Workers' Compensation First Report of Illness or Injury form. This form will be submitted along with the Incident Report to the insurance carrier when the initial claim is filed.
3. In the event of a fatality or hospitalization of 3 or more employees or if the situation is of some other nature and a meeting is critical, a member of the Executive Team or Safety Committee will call a special meeting to assess the situation. The nearest OSHA District Office will then be notified by telephone, telegraph or telefax within 8 hours of accident occurrence by the CFO or designee.
4. Corrective action will be initiated in accordance with the policy on "Correction of Unsafe Work Conditions and Practices".
5. The CFO accepts the Incident Reports and reviews for completeness, accuracy, and to assess whether appropriate remedial action was taken or recommended. When the report is incomplete or of poor quality, it will be returned to the supervisor for additional information or action.
6. A copy of the Incident Report will be retained in the file as a medical record and retained for 30 years as part of risk management perpetual records.
7. The Safety Committee will review each Incident Report for the adequacy of corrective action and will continue to monitor corrective measures at its regular meetings to ensure that corrective action is adequately taken or completed.

### **INVESTIGATIVE PROCESS:**

1. Immediately after an accident, the supervisor must ensure that any injured employee(s) receives medical treatment. The next action is to control any conditions that are immediately hazardous to people, protect other employees from any hazardous conditions, and to limit further equipment or property damage.
2. Unless necessary, the immediate physical environment of the accident area is not to be disturbed until all personnel involved in the investigation have had ample time to examine the scene. Do not attempt to repair or remove the source or agency of the accident until it has been evaluated by all those involved in the investigation. Where possible, photographs should be taken of the scene, unsafe conditions, and of the agency involved in the accident.



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3. The supervisor should interview the injured employees as soon as possible. There are two circumstances when questioning of injured personnel should be postponed:
  - a. If doing so delays medical treatment.
  - b. If the injured person is extremely upset or in pain.
4. Witnesses are important sources of accident information and should be interviewed promptly and separately after an accident. The following steps should be taken:
  - a. Remind the employee to give his complete version.
  - b. Ask questions to fill in the gaps.
  - c. Check your understanding of the accident.
5. Discuss methods of preventing the accident from recurring.
6. Detailed notes or comments are kept with the other documents associated with the incident.
7. In almost every incident a combination of hazardous conditions and unsafe acts combined to cause the accident. Mechanical defects, such as missing or inadequate guards, poor maintenance, congested work areas or poor lighting must be considered. There can be multiple unsafe acts and conditions involved.
8. If similar accidents are to be prevented from happening again, the basic causes for both the unsafe acts and conditions must be found and corrective action taken.
9. It is the responsibility of management and supervision to ensure that corrective action is taken in all investigations of injuries and property damage.

## **PROCEDURE: EMPLOYEE SAFETY ORIENTATION AND TRAINING**

### **PURPOSE:**

The safety of our employees and those around us when we work is our top priority. We are committed to a delivery model that equips all new and returning seasonal members of our team with the education and training they need to perform their roles in a safe manner. We begin with our onboarding process (pre-employment strength assessment, new hire orientation, and department introductory training programs) and continue with ongoing training throughout the employee's career at Perficut. It is our goal to ensure that employees have been advised of general safety practices and the specific hazards associated with their job assignments.

### **SCOPE:**

1. Employee training will be directed toward the following groups or categories: new employees, employees given new job assignments, on-going general safety awareness training, special skills training.
2. All employee training must be documented and include as a minimum: date(s) of training, subject/topic covered, employee's name, and presenter's name.

### **RESPONSIBILITIES:**

The topic Presenter must be a qualified and competent individual who is knowledgeable in the subject matter. Department Managers are usually responsible for scheduling staff to attend training sessions and are also required to oversee the attendance signature requirements. These are then forwarded to the Compliance Manager or designate for archival and retention.

Records are typically retained for a period of at least three years following the calendar year when training occurred.

### **PROCEDURE:**

#### **New Employees Safety Orientation and Job-Specific Safety Instruction**

1. All new employees will be provided with initial safety training as part of the onboarding process.
2. The employee's immediate supervisor will be responsible for providing the safety orientation elements that exceed the initial orientation provided to all new employees as well as specific job instruction training.

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3. The blended Safety Orientation Program will cover at a minimum:
  - a. Overview of content found in the Employee Handbook and the core Safety Manual. Appendices are usually department-specific and communicated if/when appropriate.
  - b. Job and task-specific training likely coordinated through the employee's supervisor and/or department manager.
  - c. Housekeeping and cleanup requirements for the work area and job site.
  - d. Personal protective equipment and clothing requirements. The reason for the equipment or clothing should be explained, along with its proper use, care, and maintenance.
  - e. Procedures for obtaining first aid and reporting injuries, and the need to complete an Incident Report for any type of personal injury (to the employee or others), property damage, or vehicle damage incident.
  - f. Procedures for reporting hazards or safety concerns. Employees should be strongly encouraged to report any hazards or concerns.
  - g. The major hazards to which workers will be generally exposed on the job. Do not take for granted that the employee understands the hazards related to the subjects covered.
  - h. If hazardous materials are involved on the job: Hazard Communication Program (Basic Right-To-Know Training).
  - i. Basic emergency procedures, as they apply to the location or facility in which they will work. Reference to the Emergency Action Plan.
  - j. Fundamentals of back safety and lifting. Training facilitated through the Safety Committee. Perficut may post or distribute companion training materials.
4. Job and department-specific training may be delivered in person by a person knowledgeable in the subject area, in electronic form, through written instruction guides, etc. Checklists vary from department to department. Evidence that the training content described on the appropriate checklist has occurred will be noted by the presenter and employee upon completion. The checklist will be retained in the Operations Director's office unless other procedural arrangements are in place.
5. The job instruction training will cover the specific hazards and safety precautions to be taken as part of the jobs or tasks to be undertaken and is customized to meet the needs of the employee's role. It also includes hands-on training in the use of equipment and tools that the employee would be using as well as the appropriate personal protective equipment necessary for the specific situation.
6. Supervisors should be sure employees understand safety requirements. Employees' work habits and practices should be frequently monitored. Positive reinforcement of proper and safe work practices is to be stressed through daily contacts. However, if improper or unsafe practices are noted, supervisors should immediately retrain and/or counsel employees in the correct procedures. Repeated violations should not be permitted even to and including consideration of termination.

**Employees Given New Jobs Assignments**

1. The degree of training necessary for employees given new job assignments will depend upon whether the job has been performed before. If the employee has never performed the job before, Job Instruction Training (JIT) as given to new employees will be conducted and the employee will be paired with an experienced employee.
2. If the employee has prior experience performing the job, any changes in past job procedures must be communicated, particularly any additional safety measures that have been implemented since last performing the job.
3. The supervisor is responsible for testing the employee's level of job knowledge before allowing the employee to work alone.

**Special Skills Training**

The Safety Committee, Operations Director, or designee will be responsible for establishing and coordinating



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special skills training. The skill level of an employee, relative to special training, is to be closely monitored by his or her supervisor. Refresher training is always a viable option and annually conducted for select topics. The following list includes some of the examples of Special Skills training that might occur at Perficut from time to time:

- CPR/First Aid/Bloodborne Pathogens.
- Fire Extinguisher Training.
- Forklift Training.
- Respirator Protection.
- Lockout/Tagout.
- Electrical Safety.
- PPE.
- Hazard Communications.
- Contractor Liaison

**Mentoring and Monitoring of New Employees**

1. New employees will be paired with an experienced mentor until the supervisor has thoroughly tested the employee's knowledge of the job and feels they are adequately trained. This process will include a weekly one-on-one with the department manager.
2. New employees will be given a 30, 60, and 90-day review by their department manager with input from the mentoring employee.
3. All safety training will be completed by the new employee within the allotted timeframe given by the company's learning management system and monitored by the safety compliance manager.

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**NEW EMPLOYEE GENERAL SAFETY ORIENTATION CHECKLIST**

Employee Name: \_\_\_\_\_

Dept: \_\_\_\_\_

**INITIAL ORIENTATION AND INTRODUCTION TO DEPARTMENT SAFETY**

<b>TOPIC COVERED</b>	<b>DATE</b>	<b>SUPV. INITIALS</b>
1. Employee Handbook and Safety Manual Overview		
2. Intro to Employee's Job and Task Training		
3. Housekeeping & Clean-up		
4. Personal Protective Equipment		
5. First-Aid & Injury Reporting		
6. Reporting Of Safety Hazards		
7. Major Hazards		
8. Hazard Communications		
9. Emergency Procedures		
10. Back/Lifting Safety		
11. Other		

\_\_\_\_\_  
Employee Signature & Date

\_\_\_\_\_  
Supervisor's Signature & Date

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**DRUG-FREE WORKPLACE POLICY ACKNOWLEDGEMENT**

I hereby acknowledge that I have received and read the Perficut Drug-Free Workplace Policy, a summary of the drugs which may alter or affect a drug test and a list of local Employee Assistance Programs and drug and alcohol treatment programs. I have had an opportunity to have all aspects of this material fully explained. I also understand that I must abide by the policy as a condition of initial and/or continued employment, and any violation may result in disciplinary action up to and including discharge.

Further, I understand that during my employment I may be required to submit to testing for the presence of drugs or alcohol. I understand that submission to such testing is a condition of employment with Perficut and disciplinary action up to and including discharge may result if:

- 1) I refuse to consent to such testing
- 2) I refuse to execute all forms of consent and release of liability as are usually and reasonably attendant to such examinations
- 3) I refuse to authorize release of the test results to Perficut
- 4) The tests establish a violation of Perficut's Drug-Free Workplace Policy
- 5) I otherwise violate this policy.

I also understand that if I am injured in the course and scope of my employment and test positive or refuse to be tested, I forfeit my eligibility for medical and indemnity benefits under Iowa state law.

I ALSO UNDERSTAND THAT THE DRUG-FREE WORKPLACE POLICY AND RELATED DOCUMENTS ARE NOT INTENDED TO CONSTITUTE A CONTRACT BETWEEN PERFICUT AND ME.

***THE UNDERSIGNED FURTHER STATES THAT HE OR SHE HAS READ THE FOREGOING ACKNOWLEDGEMENT AND KNOWS THE CONTENTS THEREOF AND SIGNS THE SAME OF HIS OR HER OWN FREE WILL.***

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**SIGNATURE**

---

**DATE**

---

**WITNESS**

---

**DATE**

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**OVER THE COUNTER AND PRESCRIPTION DRUGS  
WHICH COULD ALTER OR AFFECT DRUG TEST RESULTS\***

Alcohol	All liquid medications containing ethyl alcohol (ethanol). Please read the label for alcohol content. As an example, Vick's Nyquil is 25% (50 proof) ethyl alcohol, Comtrex is 20% (40 proof), Contact Severe Cold Formula Night Strength is 25% (50 proof) and Listerine is 26.9% (54 proof)
Amphetamines	Obetrol, Biphetamine, Desoxyn, Dexedrine, Didrex, Ionamine, Fastine
Cannabinoids	Marinol (Dronabinol, THC)
Cocaine	Cocaine HCl topical solution (Roxanne)
Phencyclidine	Not legal by prescription
Methaqualone	Not legal by prescription
Opiates	Paregoric, Parepectolin, Donnagel PG, Morphine, Tylenol with Codeine, Emprin with Codeine, APAP with Codeine, Aspirin with Codeine, Robitussin AC, Guaiatuss AC, Novahistine DH, Novahistine Expectorant, dilaudid (Hydromorphone), M-S Contin and Roxanol (morphine sulfate), Percodan, Vicodin, Tussi-organidin, etc.
Barbituates	Phenobarbitol, Tuinal, Amytal, Nembutal, Seconal, Lotusate, Fiorinal, Fioricet, Esgic, Butisol, Mebral, Butabarbital, Butalbital, Phenrinin, Triad, etc.
Benzodiazepines	Ativan, Azene, Clonopin, Dalmine, Diazepam, Librium, Xanax, Serax, Tranxene, Valium, Verstran, Halcion, Paxipam, Restoril, Centrax
Methadone	Dolphine, Metadose
Propoxyphene	Darvocet, Darvon N, Dolene, etc.

\*Due to the large number of obscure brand names and constant marketing of new products, this list cannot and is not intended to be all-inclusive.