

SAFETY PROGRAM

Policy



GENERAL WAREHOUSING

PREFACE

This manual is intended to serve as the basis for a safety and health management program. To explain common potential warehouse hazards and the safety precautions and procedures that are important to warehouse safety.

TABLE OF CONTENTS

Table of Contents

Section I - Management Commitment and Involvement
Policy Statement.....

Section II - Safety Committee
Safety Committee Organization.....
Responsibilities

Meetings

 Meeting Minutes.....

Section III - Safety and Health Training
Safety and Health Orientation.....
Job-Specific Training.....
Periodic Retraining of Subcontractors

Section IV - First Aid Procedures
Minor First Aid Treatment.....
Non-Emergency Medical Treatment

Emergency Medical Treatment.....
First Aid Training.....
 First Aid Instructions.....

Section V - Accident Investigation
Accident Investigation Procedures

 Investigation Report Form.....

Section VI - Recordkeeping Procedures
Recordkeeping Procedures.....
 First Notice of Injury DWC-1

 LES SAF 200 Form.....

Section VII - Safety Rules, Policies, and Procedures
Safety Rules, Policies, and Procedures.....

Section I.

MANAGEMENT COMMITMENT AND INVOLVEMENT POLICY STATEMENT

A-1 Quality Labor Service is committed to providing subcontractors with a safe and healthful workplace. It is the policy of this company that subcontractors report unsafe conditions and do not perform work tasks if the work is considered unsafe. Subcontractors must report all accidents, injuries, and unsafe conditions to their supervisors. No such report will result in retaliation, penalty, or other disincentive.

Subcontractor's recommendations to improve safety and health conditions will be given thorough consideration by our management team. Management will give top priority to and provide the financial resources for the correction of unsafe conditions. Similarly, management will take disciplinary action against a subcontractor who willfully or repeatedly violates workplace safety rules. This action may include verbal or written reprimands and may ultimately result in termination from A-1 QLS.

The primary responsibility for the coordination, implementation, and maintenance of our workplace safety program has been assigned to:

Name: Roger Solomon

Title: Safety and Security Coordinator Telephone: 513-252-7098

Senior management will be actively involved with customers in establishing and maintaining an effective safety program. Our safety program coordinator or other members of our management team will participate with you or your department's representative in ongoing safety and health program activities, which include:

- Promoting safety committee participation;
- Providing safety and health education and training; and
- Reviewing and updating workplace safety rules.

This policy statement serves to express A-1 Quality Labor Services commitment to and involvement in providing our subcontractors a safe and healthful workplace. This workplace safety program will be incorporated as the standard of practice for this organization. Compliance with the safety rules will be required of all subcontractors as a condition of their job with A-1 QLS.

Section II.

SAFETY COMMITTEE

Safety Committee Organization

A safety committee has been established as a management tool to recommend improvements to our workplace safety program and to identify corrective measures needed to eliminate or control recognized safety and health hazards.

Responsibilities

The safety committee will be responsible for assisting management in communicating procedures for evaluating the effectiveness of control measures used to protect subcontractors from safety and health hazards in the workplace.

The safety committee will be responsible for assisting management in reviewing and updating workplace safety rules based on accident investigation findings, any inspection findings, and employee reports of unsafe conditions or work practices; and accepting and addressing anonymous complaints and suggestions from subcontractors.

The safety committee will be responsible for assisting management in updating the workplace safety program by evaluating subcontractor injury and accident records, identifying trends and patterns, and formulating corrective measures to prevent recurrence.

The safety committee will be responsible for assisting management in evaluating subcontractor accident and illness prevention programs, and promoting safety and health awareness and co-worker participation through continuous improvements to the workplace safety program.

Safety committee members will participate in safety training and be responsible for assisting management in monitoring workplace safety education and training to ensure that it is in place, that it is effective, and that it is documented.

Management will provide written responses to safety committee written recommendations.

Meetings

Safety committee meetings are held quarterly and more often if needed and each committee member will be compensated at his or her hourly wage when engaged in safety committee activities.

Management will post the minutes of each meeting (see page 4) in a conspicuous place and the minutes will be available to all subcontractors.

All safety committee records will be maintained for not less than three calendar years.

SAFETY COMMITTEE MINUTES

Date of Committee Meeting: _____

Time: _____

Minutes Prepared By: _____

Location: _____

Members in Attendance

Name

Name

Name

Previous Action Items:

Review of Accidents since Previous Meeting:

Recommendations for Prevention:

Recommendations from Anonymous Subcontractors:

Suggestions from Subcontractors:

Recommended Updates To Safety Program:

Recommendations from Accident Investigation Reports:

Safety Training Recommendations:

Comments:

Section III.

SAFETY AND HEALTH TRAINING

Safety and Health Orientation

Workplace safety and health orientation begins on the first day of work or job transfer. Each subcontractor has access to a copy of this safety manual, through his or her supervisor, for review and future reference, and will be given a personal copy of the safety rules, policies, and procedures pertaining to his or her job. Supervisors will ask questions of subcontractors and answer questions to ensure knowledge and understanding of safety rules, policies, and job-specific procedures described in our workplace safety program manual.

All subcontractors will be instructed by their supervisors that compliance with the safety rules described in the workplace safety manual is required.

Job-Specific Training

- Supervisors will initially train the subcontractor on how to perform assigned job tasks safely.
- Supervisors will carefully review with each subcontractor the specific safety rules, policies, and procedures that are applicable and that are described in the workplace safety manual.
- Supervisors will give the subcontractor verbal instructions and specific directions on how to do the work safely.
- Supervisors will observe subcontractors performing the work. If necessary, the supervisor will provide a demonstration using safe work practices, or remedial instruction to correct training deficiencies before a subcontractor is permitted to do the work without supervision.
- All subcontractors will receive safe operating instructions on seldom-used or new equipment before using the equipment.
- Supervisors will review safe work practices with subcontractors before permitting the performance of new, non-routine, or specialized procedures.

Periodic Retraining of Subcontractors

All subcontractors will be retrained periodically on safety rules, policies and procedures, and when changes are made to the workplace safety manual.

The individual subcontractor will be retrained after the occurrence of a work-related injury caused by an unsafe act or work practice, and when a supervisor observes subcontractors displaying unsafe acts, practices, or behaviors.

Section IV.

FIRST AID PROCEDURES

EMERGENCY PHONE NUMBERS

Safety Coordinator	513-252-7098	Poison Control	_____
First Aid	_____	Fire Department	_____
Ambulance	_____	Police	_____
Medical Clinic	_____		
Clinic Address	_____		

Minor First Aid Treatment

First aid kits are kept in each warehouse or facility. If you sustain an injury or are involved in an accident requiring minor first aid treatment:

- Inform your supervisor.
- Administer first aid treatment to the injury or wound.
- If a first aid kit is used, indicate usage on the accident investigation report.
- Access to a first aid kit is not intended to be a substitute for medical attention.
- Provide details for the completion of the accident investigation report.

Non-Emergency Medical Treatment

For non-emergency work-related injuries requiring professional medical assistance or if you sustain an injury requiring treatment other than first aid:

- Inform your supervisor.
- Proceed to the posted medical facility. Your supervisor will assist with transportation, if necessary.
- Provide details for the completion of the accident investigation report.

Emergency Medical Treatment

If you sustain a severe injury requiring emergency treatment:

- Call for help and seek assistance from a co-worker.

- Use the emergency telephone numbers and instructions posted next to the telephone in your work area to request assistance and transportation to the local hospital emergency room.
- Provide details for the completion of the accident investigation report.

First Aid Training

Each subcontractor will receive training and instructions from his or her supervisor on our first aid procedures.

FIRST AID INSTRUCTIONS

In all cases requiring emergency medical treatment, immediately call, or have a co-worker call, to request emergency medical assistance.

WOUNDS:

Minor: Cuts, lacerations, abrasions, or punctures

- Wash the wound using soap and water; rinse it well.
- Cover the wound using clean dressing.

Major: Large, deep and bleeding

- Stop the bleeding by pressing directly on the wound, using a bandage or cloth.
- Keep pressure on the wound until medical help arrives.

BROKEN BONES:

- Do not move the victim unless it is absolutely necessary.
- If the victim must be moved, "splint" the injured area. Use a board, cardboard, or rolled newspaper as a splint.

BURNS:

Thermal (Heat)

- Rinse the burned area, without scrubbing it, and immerse it in cold water; do not use ice water.
- Blot dry the area and cover it using sterile gauze or a clean cloth.

Chemical

- Flush the exposed area with cool water immediately for 15 to 20 minutes.

EYE INJURY:

Small particles

- Do not rub your eyes.
- Use the corner of a soft clean cloth to draw particles out, or hold the eyelids open and flush the eyes continuously with water.

Large or stuck particles

- If a particle is stuck in the eye, do not attempt to remove it.

- Cover both eyes with bandage.
- Chemical
- Immediately irrigate the eyes and under the eyelids, with water, for 30 minutes.

NECK AND SPINE INJURY:

- If the victim appears to have injured his or her neck or spine, or is unable to move his or her arm or leg, do not attempt to move the victim unless it is absolutely necessary.

HEAT EXHAUSTION:

- Loosen the victim's tight clothing.
- Give the victim "sips" of cool water.
- Make the victim lie down in a cooler place with the feet raised.

Section V.

ACCIDENT INVESTIGATION

Accident Investigation Procedures

An accident investigation will be performed by the supervisor at the location where the accident occurred. The safety coordinator is responsible for seeing that the accident investigation reports are being filled out completely, and that the recommendations are being addressed. Supervisors will investigate all accidents, injuries, and occupational diseases using the following investigation procedures:

- Implement temporary control measures to prevent any further injuries to subcontractors.
- Review the equipment, operations, and processes to gain an understanding of the accident situation.
- Identify and interview each witness and any other person who might provide clues to the accident's causes.
- Investigate causal conditions and unsafe acts; make conclusions based on existing facts.
- Complete the accident investigation report.
- Provide recommendations for corrective actions.
- Indicate the need for additional or remedial safety training.

Accident investigation reports must be submitted to the safety coordinator within 24 hours of the accident.

ACCIDENT INVESTIGATION REPORT

REPORT # _____

COMPANY: _____

ADDRESS: _____

1. Name of injured: _____ S.S. #: _____

2. Sex M F Age: _____ Date of accident: _____

3. Time of accident: _____ a.m. _____ p.m. Day of accident: _____

4. Subcontractors job title: _____

5. Length of experience on job: _____ (years) _____ (months)

6. Address of location where the accident occurred: _____

7. Nature of injury, Injury type, and Part of the body affected: _____

8. Describe the accident and how it occurred: _____

9. Cause of the accident: _____

10. Was personal protective equipment required? yes no

Was it provided? yes no

Was it being used? yes no If "no", explain.

Was it being used as trained by supervisor or designated trainer?

yes no If "no", explain _____

11. Witness(es): _____

12. Safety training provided to the injured? yes no If "no", explain.

13. Interim corrective actions taken to prevent recurrence: _____

14. Permanent corrective action recommended preventing recurrence: _____

15. Date of report: _____
Prepared by: _____

Supervisor (Signature) _____ Date: _____

16. Status and follow-up action taken by safety coordinator: _____

Facility Manger: _____ Date: _____
Signature

Regional Manager: _____ Date: _____
Signature

Director of Safety: _____ Date: _____
Signature

Owner/Operations : _____ Date: _____
Signature

INSTRUCTIONS FOR COMPLETING THE ACCIDENT INVESTIGATION REPORT

An accident investigation is not designed to find fault or place blame but is an analysis of the accident to determine causes that can be controlled or eliminated.

(Items 1-6) Identification: This section is self-explanatory.

(Item 7) Nature of Injury: Describe the injury, e.g., strain, sprain, cut, burn, fracture. **Injury Type:** First aid -injury resulted in minor injury/treated on premises; Medical - injury treated off premises by physician; Lost time - injured missed more than one day of work; No Injury - no injury, near-miss type of incident. **Part of the Body:** Part of the body directly affected, e.g., foot, arm, hand, head.

(Item 8) Describe the accident: Describe the accident, including exactly what happened, and where and how it happened. Describe the equipment or materials involved.

(Item 9) Cause of the accident: Describe all conditions or acts which contributed to the accident, i.e.,

- A. unsafe conditions - spills, grease on the floor, poor housekeeping or other physical conditions.
- B. unsafe acts - unsafe work practices such as failure to warn, failure to use required personal protective equipment.

(Item 10) Personal protective equipment: Self-explanatory

(Item 11) Witness(es): List name(s), address(es), and phone number(s).

(Item 12) Safety training provided: Was any safety training provided to the injured related to the work activity being performed?

(Item 13) Interim corrective action: Measures taken by supervisor to prevent recurrence of incident, i.e., barricading accident area, posting warning signs, shutting down operations.

(Item 14): Self-explanatory

(Item 15): Self-explanatory

(Item 16) Follow-up: Once the investigation is complete, the safety coordinator shall review and follow-up the investigation to ensure that corrective actions recommended by the safety committee are approved by management , and control measures have been implemented.

Section VI.

RECORDKEEPING PROCEDURES

Recordkeeping Procedures

The safety coordinator will control and maintain all subcontractor accident and injury records. Records are maintained for a minimum of three (3) years and include:

- Accident Investigation Reports
Workers' Compensation Notice of Injury Reports
- Log & Summary of Occupational Injuries and Illnesses notice of injury.

Section VII.

SAFETY RULES, POLICIES, AND PROCEDURES

The safety rules contained on these pages have been prepared for your guidance and protection in your daily work. Subcontractors are to study these rules carefully, review them often and observe these precautions and good common sense in carrying out their duties.

ALL SUBCONTRACTORS

Lifting
Step Stools.....

WAREHOUSE

General Rules.....
Housekeeping.....
Packaging and Crates.....
Handling Loads.....
Manual Steel Drum Handling.....
Ladders.....
Forklifts.....
Loading Docks.....
Hand Trucks.....
Pallet Jacks.....

MAINTENANCE

General Rules.....

DELIVERY

Hand Trucks

ALL SUBCONTRACTORS

Lifting

1. Plan the move before lifting; remove obstructions from your chosen pathway.
2. Test the weight of the load before lifting by pushing the load along its resting surface.
3. Position your feet 6 to 12 inches apart with one foot slightly in front of the other.
4. Face the load.
5. Bend at the knees, not at the back.
6. Keep your back straight.
7. Get a firm grip on the object with your hands and fingers. Use handles when present.
8. Hold objects as close to your body as possible.
9. Perform lifting movements smoothly and gradually; do not jerk the load.
10. If you must change direction while lifting or carrying the load, pivot your feet and turn your entire body. Do not twist at the waist.
11. Set down objects in the same manner as you picked them up, except in reverse.
12. Do not lift an object from the floor to a level above your waist in one motion. Set the load down on a table or bench and then adjust your grip before lifting it higher.

Step Stools

1. Allow only one person on the step stool at a time.
2. Face the step stool when climbing up or down.
3. When performing work from a step stool, face the step stool and do not lean backward or sideways from the step stool.
4. Do not place a step stool on boxes, books, or other unstable bases.
5. Do not stand on the top step of the step stool.

WAREHOUSE - Forklift Operators, Dock Workers

General Rules

1. Use common sense.
2. Move slowly when approaching blind corners.
3. No jumping off docks or trailers. Use the stairs or a ramp.

Housekeeping

1. Do not place work materials such as boxes or empty pallets in walkways and passageways.
2. Do not block or obstruct stairwells, exits or accesses to safety and emergency equipment such as fire extinguishers or fire alarms.
3. Do not try to kick objects out of pathways. Push or carry them out of the way.
4. Do not let items overhang from shelves into walkways.
5. Place products that are to be depalletized by hand on the lower or middle pallet racks.
6. Stack items on pallets so that they lie flat and do not lean against each other.

Packaging and Crates

1. Remove or bend nails and staples from crates before unpacking.
2. When cutting shrink wrap with a blade, always cut away from you and your co-workers.
3. When opening cartons use safety box cutters. Do not cut with the blade extended beyond the guard.

Handling Loads

1. If the load is too heavy or bulky, use lifting and carrying aids such as hand trucks, dollies, pallet jacks and carts, or get assistance from a co-worker.
2. If assistance is required to perform a lift, coordinate and communicate your movements with those of your co-worker.
3. Wear protective gloves when lifting objects with sharp corners or jagged edges.
4. Move containerized items by pushing them rather than carrying them.
5. When manually stocking shelves, position the materials to be shelved slightly in front of you, so you do not have to twist when lifting and stacking materials.

Manual Steel Drum Handling

1. Roll drums by pushing against the middle of the drum with both hands.
2. Use a cradle-type drum tilter when tilting drums.
3. Do not try to up-end a full drum by yourself.
4. Do not roll a full drum up a skid by yourself.
5. Chock both sides of a drum when storing the drum in a horizontal position.

WAREHOUSE - Forklift Operators, Dock Workers

Ladders

1. Do not use ladders that have loose rungs, cracked or split side rails, missing rubber foot pads, or other visible damage.
2. Allow only one person on the ladder at a time.
3. Face the ladder when climbing up or down.
4. Maintain a three-point contact by keeping both hands and one foot or both feet and one hand on the ladder at all times when climbing up or down.
5. Do not stand on the top two rungs of any ladder.
6. Do not stand on a ladder that wobbles, or that leans to the left or right.
7. Secure the ladder in place by having another employee hold it.
8. Do not move a rolling ladder while someone is on it.
9. Do not place ladders on barrels, boxes, concrete blocks or other unstable bases.
10. Do not carry items in your hands while climbing up or down a ladder.
11. Do not try to "walk" a ladder by rocking it. Climb down the ladder, and then move it.

Forklift Safety Rules

1. Do not exceed the lift capacity of the forklift. Read the lift capacity plate on the forklift if you are unsure.
2. Follow the manufacturer's guidelines concerning changes in the lift capacity before adding an attachment to a forklift.
3. Lift the load an inch or two to test for stability: If the rear wheels are not in firm contact with the floor, take a lighter load or use a forklift with a higher lift capacity.
4. Do not raise or lower a load while you are en route. Wait until you are in the loading area and have stopped before raising or lowering the load.
5. After picking up a load, adjust the forks so that the load is tilted slightly backward for added stability.

6. Drive with the load at a ground clearance height of 4-6 inches at the tips and 2 inches at the heels in order to clear most uneven surfaces and debris.
7. Drive at a walking pace and apply brakes slowly to stop when driving on slippery surfaces such as icy or wet floors.
8. Approach railroad tracks at a 45° angle.
9. Do not drive over objects in your pathway.
10. Do not drive into an area with a ceiling height that is lower than the height of the mast or overhead guard.
11. Steer wide when making turns.
12. Do not drive up to anyone standing or working in front of a fixed object such as a wall.
13. Do not drive along the edge of an unguarded elevated surface such as a loading dock or staging platform.
14. Obey all traffic rules and signs.
15. Sound horn when approaching blind corners, doorways or aisles to alert other operators and pedestrians.
16. Do not exceed a safe working speed of five miles per hour; slow down in congested areas.
17. Stay a minimum distance of three truck lengths from other operating mobile equipment.
18. Drive in reverse and use a signal person when your vision is blocked by the load.
19. Look in the direction that you are driving; proceed when you have a clear path.
20. Do not use bare forks as a man-lift platform.
21. Do not drive the forklift while people are on the attached man-lift platform.
22. Drive loaded forklifts forward up ramps.
23. Raise the forks an additional two inches to avoid hitting or scraping the ramp surface as you approach the ramp.
24. Drive loaded forklifts in reverse when driving down a ramp.
25. Drive unloaded forklifts in reverse when going up a ramp and forward when going down a ramp.
26. Do not attempt to turn around on a ramp.
27. Do not use "Reverse" to brake.
28. Lower the mast completely, turn off the engine and set the parking brake before leaving your forklift.

WAREHOUSE PERSONNEL - Forklift Operators, Dock Workers, Order Retrievers

Loading Docks

1. Keep the forklift clear of the dock edge while vehicles are backing up to the dock.
2. Do not begin loading or unloading until the supply truck has come to a complete stop, the engine has been turned off, the dock lock has been engaged and the wheels have been chocked.
3. Attach the bridge or dock plate before driving the forklift into the truck.
4. Do not drive the forklift into a truck bed that has soft or loose decking or other unstable flooring.
5. Drive straight across the bridge plates when entering or exiting the trailer.
6. Use dock lights or headlights when working in a dark trailer.

Hand Trucks

1. Tip the load slightly forward so that the tongue of the hand truck goes under the load.
2. Push the tongue of the hand truck all the way under the load to be moved.
3. Keep the center of gravity of the load as low as possible by placing heavier objects below the lighter objects.
4. When loading hand trucks, keep your feet clear of the wheels.
5. Push the load so that the weight will be carried by the axle and not the handles. The operator should only balance and push.
6. If your view is obstructed, use a spotter to assist in guiding the load.
7. Do not walk backward with the hand truck, unless going up stairs or ramps.
8. When going down an incline, keep the hand truck in front of you so that it can be controlled at all times.
9. Move hand trucks at a walking pace.
10. Store hand trucks with the tongue under a pallet, shelf, or table.
11. Do not exceed the manufacturer's load rated capacity. Read the capacity plate on the hand truck if you are unsure.

WAREHOUSE PERSONNEL - Forklift Operators, Dock Workers, Retrievers

Pallet Jacks

1. Only employer authorized personnel may operate pallet jacks.
2. Do not exceed the manufacturer's load rated capacity. Read the lift capacity plate on the pallet jack if you are unsure.
3. Do not use pallets or skids that are cracked or split or have other visible damage.
4. Do not ride on pallet jacks.
5. Start and stop gradually to prevent the load from slipping.
6. Pull manual pallet jacks; push when going down an incline or passing close to walls or obstacles.
7. If your view is obstructed, use a spotter to assist in guiding the load.
8. Stop the pallet jack if anyone gets in your way.
9. Do not place your feet under the pallet jack when it is moving.
10. Keep your feet and other body parts clear of pallet before releasing the load.

Commitment to Safety

It is the Policy of A-1 Quality Labor Service to ensure that every subcontractor has a safe and healthy working environment. The Policy requires all departments and locations to be in compliance with all applicable local, state or federal laws, regulations and Company policies concerning safety and health. Objectives of our Health and Safety Program include the identification of, elimination or control of all hazards to personnel, products, equipment and facilities.

All levels of supervision are responsible for maintaining safe working conditions, for properly instructing each subcontractor in the safe performance of assigned tasks to ensure that the tools and equipment in their workplace are maintained and operated in a safe manner. Additionally, each supervisor is responsible to inform each subcontractor within his area of the Company's health and safety requirements and to assure that each subcontractor understands them.

The Company is responsible for promoting a safety culture that encourages accident prevention and continually strives to improve its safety and health performance.

All subcontractors have a personal responsibility to understand, promote, and follow safe practices to ensure that their actions will not cause injury to themselves or to others. Working together effectively requires knowledge and understanding of procedures, safe ways of working, and proper attitudes. Subcontractors are also responsible to notify their supervisor of potential or existing hazards to health or safety. Willful or careless neglect resulting in occupational injury or property damage may be cause for disciplinary action.

The Company's safety rules and procedures have been prepared to serve as minimum procedures to help all subcontractors work safely. Additional safety rules required for site-specific conditions will be provided as needed by your supervisor.

Personal Commitment to Health and Safety

I have completed the reviews of safety related material, and the policy of A-1 Quality Labor Service and my required training. I commit to follow those safety requirements that apply to my work and to behave consistently with the value A-1 Quality Labor Service places on my safety and the safety of others.

I acknowledge that I am responsible for my own safety and will perform my work in a safe manner. I recognize I have the right to refuse to perform any work that I reasonably believe to be unsafe.

Finally, I commit to contributing to my work colleagues' safety by respectfully calling to their attention any unsafe practices I may observe. I also agree that if a colleague points out any unsafe practice of mine, that I will listen to the input and, in good faith, will reassess what I am doing.

Print Name _____

Signature _____

Date _____