HEALTH AND SAFETY POLICY MANUAL

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Revision: Rev 7

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McGINLEY MAINTENANCE, INC.



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CORPORATE POLICY STATEMENT

All employees of McGinley Maintenance Inc. (MMI or "Company") have the common objective of a safe, productive, environmentally sound, and Customer-focused conduct of our activities. In pursuing this objective, employee and Customer safety and health will always be our top priority. Therefore, this Policy must be considered in every phase of our business including job planning, job setup, and performance. Our guiding principles supporting this Policy include:

- Complying with all laws that regulate worker safety, health, and our environment;
- Recognizing the priority of safety and health factors over purely economic considerations;
- Hiring employees who understand the importance of safety and executing jobs tasks in a safe manner consistent with the policies of the Company and the training and instruction provided;
- Providing employee safety training to new hires;
- Training employees in safe and proper job procedures and required compliance with established safety policies and practices and promoting employee health and safety both on and off the job;
- Holding each worker accountable for the safe execution of all jobs assigned and full compliance with all environmental, safety, and health related procedures and training;
- Maintaining leadership in safety and accident/incident prevention by continuously improving safety performance and work methods and procedures.

It is a condition of employment that all employees contribute to the Company environmental, health, and safety program by following all policies and procedures, bringing potentially unsafe conditions and action to the attention of management, and recommending actions to improve the effectiveness of the program.

While Company supervisors will encourage, monitor and review compliance with this Policy, all employees must follow all rules and regulations necessary for the safe conduct of their work. The prevention of accidents and safety incidents requires everyone's concerted effort and daily attention. Every MMI employee has authority and responsibility to take appropriate action to avoid and correct unsafe acts or conditions.

At McGinley Maintenance Inc., everyone's first priority is to <u>WORK SAFELY</u> – EVERY JOB, EVERY DAY.

Please review this Policy Manual carefully, follow these Policies in your work activities, and remember:

NEVER TAKE CHANCES – THINK SAFETY FIRST!

Brian P. McGinley, President

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1. JOB COMPETENCY

PURPOSE

The purpose of this Policy is to outline general job competencies for McGinley Maintenance Inc. employees. These are general expectations and are in no event exclusive of any other MMI, Customer, legal or regulatory requirements or standard.

RESPONSIBILITIES

Supervisors or designated Safety Representatives will be responsible for:

- Identifying, updating, and enforcing minimum qualification and safety training.
- Supplying training documentation to employees and Company management.
- Monitoring new employees or employees who have changed job roles or responsibilities.
- Assigning employees to jobs which meet their capabilities and competencies.
- Completing job training identified prior to the employee being assigned the task.
- Assign employees with sufficient experience or training to safely perform the work.

MMI employees will be responsible for:

- Attending safety and health management training.
- o Following all instruction and direction issued by MMI management or our Customer.
- o At all times, work safely, responsibly and with respect for people and property.

PROCEDURES

Competence

Competence is a combination of knowledge, skills, and abilities to sufficiently perform the assigned task. The (1) Experience, (2) Level of Knowledge, and (3) Capability to Perform are to be considered for employees at each worksite.

Competency also involves ongoing assessment, training and development of each employee's responsibilities, abilities, and critical activities. This process enables continuous improvement and may include:

- Selection/Job Assignment → Candidate Selection and Hiring Process (Background Check, Drug Screen, Physical Assessment) → Person Assessed and Hired for Open Position.
- 2. **Experience, Qualifications, Initial Training** ↔ Initial Induction Training Completion
- 3. Further Training Required? If no \rightarrow Ready for Work \rightarrow On the Job Training \rightarrow Competency Continually Assessed
- 4. **Annual Performance Appraisal** → Promotable? → Promotion? → Further Training Required?

Competency is verified before employees are permitted to perform job tasks independently. A competent person (supervisor, lead hand, instructor, etc.) must verify that a worker is competent to perform their roles and responsibilities before being allowed to work independently.

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Documentation

Based on the job description, documentation of competency may include educational, certifications, prior experience, etc. Competency is reviewed and confirmed during the worker hiring and orientation process.

Identification of Positions

Based on the specific position and its exposure to risk, the extent of job training will be assessed and additional training conducted as needed.

Identification of Qualifications

Physical qualifications for each job have been established. Additional qualifications may include a combination of education, certifications, and work experience. Safety training completion for the indicated job title is required before full qualifications are met.

Identification of Training and Competency Needs

Employees (new or transferred) are provided job specific training related to their roles and responsibilities and trained on the tasks they perform on a regular basis. Training is conducted based on specific job responsibilities and foreseeable workplace hazards.

Training Records/Documentation

Training programs and records are maintained by MMI management or their designee. Each new worker shall receive an orientation prior to beginning any work.

Delivery of Induction, Transfer and Refresher Training

Employees receive initial induction training. Training is tracked and training sessions are conducted by experience, competent/qualified supervisors for the required subject matter. Applicable training will be completed regularly and according to certification requirements.

Supervisor Safety Management Training

Supervisors and managers will also receive ongoing safety and safety management system training to maintain awareness of updated safety legislation, practices, and standards and will communicate such updates to employees.

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2. ORIENTATION

PURPOSE

Management and supervisors will provide new employees with MMI's Health and Safety Orientation process, necessary site training, and project specific or Customer required health and safety information.

PROCEDURES

The safety orientation will include the following elements:

- A copy of this Health and Safety Policy Manual
- · Review of applicable health and safety legislation including employee right to refuse unsafe work
- Overview of the Company Health and Safety program including:
 - Health and Safety responsibilities
 - Hazard Assessment, Analysis & Control
 - Safe Work Procedures
 - Disciplinary Policy
 - Drug & Alcohol Policy

- Personal Protection Equipment
- Incident Reporting
- Emergency Response
- Heat and Cold Stress
- Workplace Security
- Review of some common workplace risks for MMI employees, such as:
 - Wires and cords; Loose tile and carpet
 - Wet floors, spills, splashes
 - Electrical outlets, cable and phone boxes
 - o Boxes, paper and other loose items placed in walkways, stairs
 - Equipment and other items extending into hallways and walkways
 - Loose clothing or slippery soled shoes
 - o Sharp objects in trash or on furniture or equipment
- Customer site-specific health and safety requirements
- Any additional regional, divisional, Customer, or site-specific health and safety requirements as deemed necessary by local management.

Employees will be required to participate in regular health and safety updates. These updates will be performed by a supervisor or competent designate. A verification or evaluation process, oral evaluation, or work practice evaluation, will be a part of the safety orientation.

Supervisors will assist with on-site safety training and orientation. The Company will monitor and mentor any new employee or an employee who has changed job roles as part of this safety orientation process.

A copy of the Company's Job Orientation Guide/Safety Review checklist is attached as Appendix A.

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3. DRUG AND ALCOHOL POLICY

PURPOSE

The purpose of this Policy is to describe MMI's commitment to maintaining a work environment free from alcohol and drugs for all employees. The Company has "Zero Tolerance" for employees using or being under influence of alcohol or drugs at the worksite or while on duty for the Company and employees must fully comply with this Policy and any directives of management or our Customer in support of this Policy.

PROCEDURES

- Pre-employment drug screens are required. If the drug screen exceeds established thresholds, the applicant will not be employed. No applicant can be reconsidered for employment sooner than six (6) months following the date of the positive drug screen.
- Any current employee who refuses to submit to a drug screen when requested or refuses to fully
 cooperate with the implementation or administration of this Policy will be subject to disciplinary action
 including, without limitation, discharge from employment for cause.
- The following actions are strictly prohibited:
 - use, consumption, possession, distribution, sale or transfer of alcohol, drugs (other than legal medications specifically prescribed for that employee) or drug paraphernalia while on MMI property, at a Customer worksite, or while performing services or operating a vehicle in the scope of work for the Company;
 - reporting to or performing work while under the influence of, or the ability to safely perform duties is adversely affected by, alcohol or drugs (even if legally prescribed);
 - o refusing to comply with a request to submit to an alcohol or drug test at any time;
 - o refusing to leave the workplace when requested by Company or Customer management when suspected of being under the influence of alcohol or drugs.

Testing Substances

As a minimum under this Policy, an employee shall conclusively be considered under the influence when the following substances and detection levels are determined to apply to that employee:

- Alcohol level equal to or in excess of 0.04 BAC or 100 ng/ml urine
- Drug concentrations equal to or in excess of the amounts set forth in the below table:

Drugs or Classes of Drugs	Screening concentration equal to or in excess of ng/ml (urine)
Marijuana metabolites	50
Cocaine metabolites	300
Opiates	2000
6-Acetylmorphone	10
Phencyclidine	25
Amphetamines/Methamphetamines	1000
MDMA	500

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Concentrations at or in excess of the above levels shall be conclusive proof of unacceptable levels of unauthorized, prohibited, illegal or controlled substances. The listed drugs and concentrations are in no event to be considered exclusive or a limitation on the Company testing and/or disciplining for other drugs or concentrations. For example, the Company may test and, and this Policy will apply to:

- A greater number of substances (panels) to be tested;
- A lower prohibited detection/concentration levels;
- Specified number, percent, or frequency of employees to be tested on any work site;
- Various methods of testing including, without limitation, blood, urine, hair, breath, etc.
- DOT or similar mandated programs.

4. EMERGENCY ACTION PLAN

PURPOSE

The purpose of an Emergency Action Plan is to provide guidance to Company employees in the event of an actual or potential emergency encountered while working for the Company. Examples of emergencies include, without limitation: fire, tornado, flood, bomb threat, hazardous chemical spill, active shooter, etc. at or near the employee's work location.

PROCEDURES

When the fire alarm sounds or an announcement of an emergency is made at your workplace, immediately follow the instructions of worksite management exit and the building if appropriate. Employees discovering a fire, smoky condition, chemical leak or spill, or other emergency must immediately inform Customer management and take all personal precautions. If no Customer representatives are available when an emergency is discovered, employees should call 911 from a safe location and immediately contact MMI management.

In the event of an emergency:

- Remain calm while moving to safety quickly;
- Know the evacuation routes, exits, and designated safe meetings areas;
- Cooperate with site management and inform your MMI supervisor of the emergency;
- Await further instructions from site management or designated responsible personnel;
- If the work site business is disrupted, MMI management will identify resources needed and plans to be implemented to assist our Customers with their business continuity program.

Employees must know the location of all exits at their workplace. If you are unfamiliar with exits at a particular work location, employees are authorized to take as much time as needed to familiarize themselves with all exits, evacuation routes, fire alarms, eye wash stations, and other safety procedures and processes at their workplace. If necessary, employees should request assistance from their supervisor or Customer management.

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In case of a fire, call the local Fire Department at 911. In addition, the smoke alarms will alert building occupants of the need for evacuation. Any pertinent fire or rescue information should be conveyed to the Fire Department. Workers discovering a fire, smoky condition or any other emergency shall activate the fire alarm system and make a verbal announcement immediately.

When the fire alarm sounds or a verbal announcement is made, all workers should ensure that nearby workers are aware of the emergency, quickly shutdown operating equipment, close doors and exit the building. All workers should proceed to their Designated Muster Area via their primary or alternate exits and await further instructions.

Initial training regarding this EAP, and refresher training, is required; (1) when the plan is developed or the worker is assigned initially to a job, (2) when the worker's responsibilities under the plan change, or (3) when the plan is changed.

REMEMBER R.A.C.E.

Rescue: In an emergency, rescue people in immediate danger if you can do so without endangering yourself.

Alarm: Sound the alarm by pulling a fire box and call 911 from a safe distance.

Confine: if possible, close all doors, windows, and other openings.

Evacuate: Evacuate the building.

Designated Meeting Area

When an alarm sounds or a verbal announcement is made, all occupants will proceed to the nearest exit and gather at the designated meeting area or "Muster Area" which can be pictured on the facilities emergency evacuation maps in the Customer's facility. The "Muster Area" is designated to be the safe meeting point for all workers. Once the evacuation has been completed, a head count shall be conducted. The on-site responsible representative will have the responsibility of accounting for workers and visitors in the Muster Area after the evacuation.

Rescue & Medical Duties - In general:

- do not move injured workers
- keep injured workers lying down, covered, and warm
- allow trained workers to conduct rescue and medical duties

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5. HAZARD COMMUNICATION

PURPOSE

The purpose of this Policy is to establish procedures for the communication of the safe handling and use hazardous chemicals relating to the services provided to the Customer by the Company.

The Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (HCS), aligned with the Globally Harmonized System of Classification and Labeling of Chemicals (GHS), calls for the development of a hazard communication program when employees may be exposed to chemicals in the workplace under normal conditions of use or in a foreseeable emergency. As a result, this plan has been developed to comply with the applicable requirements and will include and address the following criteria:

- identification of hazardous chemicals known to be present in the employee's work area;
- process to label or mark all containers identifying the product contained therein;
- provide and maintain safety data sheets (SDSs) of applicable chemicals;
- provide employees with information and training on hazardous chemicals in their work areas;
- inform employees of the hazards of non-routine work practices;
- provide employees or other workers (e.g., consultants, contractors, Customer's employees, etc.) on-site access to SDSs for each hazardous chemical;
- inform employees of other precautionary measures that may need to be taken with respect to workplace chemicals to protect themselves during normal operating conditions.

The hazard communication program will identify the following:

- Key personnel responsible for the program
- Workplace labeling system for the chemical inventory and SDSs
- Good work practices and procedures to minimize exposures
- Training to be performed
- Procedures to maintain the program and update the required information

RESPONSIBILITIES

The supervisor and/or safety manager will administer the hazard communication program, including:

- Reviewing potential hazards and safe use of chemicals
- Maintaining a list of all hazardous chemicals and a master file of SDSs
- Providing proper labels, tags or markings for all containers
- Providing new-hire and regular training for employees
- Maintaining training records
- Properly selecting and replacing personal protective equipment as needed
- Informing outside contractors performing work on Company property about potential hazards
- Reviewing the effectiveness of the hazard communication program and compliance with applicable federal, state, or local hazard communication requirements.

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Employees are responsible for the following aspects of the hazard communication program:

- Recognizing hazards before starting a job
- Reading and following container labels and SDSs
- Notifying your supervisor of torn, damaged, or illegible labels or unlabeled containers, or of the need for particular personnel protective equipment
- Using controls and/or available personal protective equipment
- Following instructions and warnings pertaining to chemical handling, usage and disposal
- Properly caring for PPE, including routine care and cleaning, storage, and replacement
- Understanding the risk of not following instructions or the safe handling and use of chemicals
- Participating in training and instruction.

PROCEDURES

Labels and Other Forms of Warning

Each container of hazardous chemicals received by the Company will be labeled with the original label or authorized replacement label containing the name and address of the manufacturer, precautionary statements, and other information as required by law.

The Company 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 must be labeled, tagged, or marked with a label containing the information required by law. The Company will have secondary container labels available and the employee must request and affix such label when using secondary containers.

Employees may not deface or remove labels from containers of hazardous chemicals. Portable containers or bulk containers used for chemical dilution (where approved) into which hazardous chemicals may be transferred from the original labeled containers, must also be properly labeled. Food and beverage containers must never be used for chemical storage.

Product labels or other forms of warning will be legible, 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.

Safety Data Sheets

SDS will be obtained and maintained for each hazardous chemical provided by the Company in the workplace. SDSs for each hazardous chemical will be readily accessible during each work shift to employees when they are in their work areas. SDSs will be obtained from the chemical manufacturer or distributor.

Company management or delegate will maintain the master file of all original SDSs. Updated SDSs, or new SDSs for new products, will be provided to the work site as required.

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Worker Information and Training

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 area:

- Requirements of OSHA Hazard Communication Standard 29 CFR 1910.1200 (General Industry)
- Operations in the work area where hazardous chemicals provided by the Company are present
- Location and availability of the hazard communication program, chemical inventory list and SDSs
- Measures employees can take to protect themselves from hazards, such as appropriate controls, work practices, emergency and spill cleanup procedures, and personal protective equipment
- Explanation of the workplace labeling system and label on product containers
- Explanation of the SDS, including order of information and how employees can obtain and use the appropriate hazard information.

Subcontractors

Prior to beginning work, the site supervisor or delegate will inform subcontractors of any hazardous chemicals that they may be exposed to while performing their work, safety control measures to be employed by the subcontractor, personal protective equipment to be worn by the subcontractors' employees, and any other precautionary measures to be taken during normal operating conditions and in foreseeable emergencies.

The Company supervisor or delegate will also (1) advise subcontractors that they must comply with all OSHA standards while working for the Company, and (2) inform subcontractors of the workplace labeling system and the availability and location of SDSs for any chemical at the Company's work site.

Recordkeeping

Records pertaining to the hazard communication program will be maintained by the Company Safety Coordinator or delegate. The Safety Coordinator or delegate will keep the following records:

- Chemical inventory list
- Hazardous material reviews
- SDSs for chemicals used at the worksite
- Worker training records
- Warnings issued to employees for not following the hazard communication program

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6. HAZARD IDENTIFICATION, RISK ASSESSMENT AND CONTROL

PURPOSE

The purpose of this Policy is to help identify and evaluate existing and potential hazards on Company or Customer worksites as well as methods to control or eliminate the hazards identified.

RESPONSIBILITIES

Supervisors

The supervisor or delegate shall identify the known hazards on the work site before any new employees begins the job. By identifying hazards early, safety controls may be able to be implemented before risks are encountered. Hazards can be identified and ranked and controls or protections implemented.

Identifying known hazards on the work site should include:

- Review of tasks involved with the services being provided
- Review of accident/incident/near-miss records
- Involving affected employees in the risk identification and assessment process
- Assessment of the way work is organized (include experience and age of people doing the work)
- Assess foreseeable unusual conditions or possible non-routine activities such as extra tasks
- Examine possible risks to Customer's employees, visitors, or the public
- Assessment of different levels of risk such as young or inexperienced employees, etc.
- Implement a continuous improvement process for lessons learned to be incorporated into hazard controls such as plan-do-check-act (PDCA) or other similar improvement process
- Review of potential hazards and risks with all affected employees.

PROCEDURES

General

The hazard identification process is used for routine and non-routine activities as well as new processes, changes in operation, products, or services as applicable. The assessment process must be completed prior to the start of all jobs to identify existing or potential hazards to employees and control these hazards using engineering or administrative controls, proper training, or the use of personal protective equipment (PPE). All company employees should be trained on hazard identification and risk assessment.

All employees are required to take a proactive approach to managing and reporting hazards. When a hazard is observed, employees must avoid the hazard and inform their supervisor and Customer management. Do not take steps to correct that hazard directly unless it is within the direct scope of your job responsibility, you have advised your supervisor, AND you are adequately knowledgeable to do so safely. Since we work at the Customer's facilities, employees should typically get assistance from appropriate employees of the Customer. Where hazards cannot be eliminated immediately, employees should take necessary steps to warn others of the hazard. Always report a potentially hazardous condition to your supervisor.

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Risk Assessment

Processes are in place to identify potential hazards using Job Safety Analysis (JSA), Job Hazard Analysis (JHA) facility wide or area specific analysis/inspections. Information collected, organized, and reviewed with employees will determine which employees may be exposed or potentially exposed to hazardous conditions. Risk assessments should be done at a minimum, prior to beginning work. A risk assessment will include consideration of changes occurring to processes, equipment, weather, or facilities. Employees will be actively involved in the hazard identification process and potential hazards will be re reviewed with all employees concerned. Information available in the workplace may include:

- Safety Data Sheets (SDS)
- Inspection and accident reports

- Records of previous injuries and illnesses
- JSA and other prior assessments.

Classification

Hazards are classified based on probability and severity. Ranking or prioritizing hazards is a way to help determine which hazard is the most serious and thus which hazard to control first. Priority is usually established by considering the worker exposure and the potential for accident, injury, or illness. Hazards are to be mitigated through a hierarchy of controls including elimination, substitution, engineering, administrative, and PPE.

Probability of Occurrence

Estimating risk probability involves knowledge of the workplace, urgency of situations, and objective judgment. The following is an example of factors to consider in estimating risk probability:

- A. Risk is likely to occur immediately could happen any day
- B. Probable in time likely to happen if conditions are repeated
- C. Possible in time subject to particular conditions, the incident might occur
- D. Remotely possible even under most foreseeable conditions, it is unlikely the incident will occur.

Severity of Risk

What is the severity of the risk if the employee is exposed to a hazard:

- 4 Low if the risk occurs, the harm is likely minimal
- 3 Medium risk of minor to moderate harm if the risk occurs
- 2 High risk of serious or severe injury or harm
- 1 Extreme catastrophic injury or death activities in this category are not allowed.

For the activity being examined, determine the most likely reasonable level of severity (levels 1 through 4 in the above example) and how likely (the probability) the injury would be (letters A-D).

Once the risk has been assessed, appropriate controls will be considered, including the following:

- Elimination (including substitution) remove the hazard from the workplace (if possible, would likely require coordination with our Customer since we work at our Customer's facilities).
- Engineering Controls modifications to equipment, etc., to reduce the source of exposure (such

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as trip hazards by rerouting of cords, removal of boxes, clearing of aisle, etc.)

- Administrative Controls alter the way the work is done and work practices such as operating procedures (including training, housekeeping, and personal hygiene practices).
- PPE equipment to reduce exposure or risk, such as:
 - contact with chemicals (safety gloves and glasses)
 - exposure to noise (ear plugs)
 - falling objects (hard hats, steel toes shoes)
 - o slip and falls (slip resistant shoes, prompt treatment of slippery surfaces)
 - use of wet floor signs, caution tape, and other warnings.
- Consult Section 7 PERSONAL PROTECTIVE EQUIPMENT of this Policy Manual.

Communicate the Controls and Train the Employees

All employees will be trained in the hazard identification process, including the use and care of proper PPE. Once the control has been put into place, the Company shall train employees how to use it. This applies whether it is an engineering control such as a guard or interlock, an administrative control such as a safe work procedure for cold weather, or particular PPE when handling a chemical.

2 Minute Drill - Daily Job Safety Evaluation

Once the risks have been identified and controls established, employees must apply their knowledge of risk avoidance each day on the job. At MMI, we have established what is called our "2 MINUTE DRILL."

All employees are instructed to take at least 2 minutes before starting work each day to assess the following:

- What are the potential hazards on this job?
- How can I eliminate or completely avoid those hazards?
- Am I wearing the proper PPE for this job?
- If I encounter an unsafe condition on this job that I cannot eliminate or avoid, I understand I must STOP and contact my supervisor for further instruction.
- I will at all times remember "Safety First /Safety Before Speed".

Review

The Hazard Assessment process will be repeated when safety may be impacted by site conditions changes, new tasks, scope of work modifications, or when new employees are added to the work site.

PROHIBITED WORK ACTIVITIES

MMI has conducted risk assessments of certain activities and determined that the following activities may create an unacceptable risk and are outside the scope of MMI's work, and therefore may NOT be undertaken by MMI employees. Those activities include: (1) confined space entry; (2) open flame or "hot" work; (3) electrical work; (4) operation of pneumatic tools or equipment. This Policy establishes that MMI employees are strictly prohibited from engaging in these activities. (This is only a limited example of prohibited work.)

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7. PERSONAL PROTECTIVE EQUIPMENT

PURPOSE

The purpose of the Personal Protective Equipment (PPE) Program is to implement the identification, use, care, and maintenance of PPE to be used by employees for the prevention of illness and injury. Employees are to use these procedures as a guide to PPE and not as a final standard. PPE usage must always consider the risk assessment for the job activities being undertaken, product or equipment warnings, Customer and regulatory requirements, and other factors when considering when to use PPE and what type of PPE to use. This Policy only addresses general PPE considerations. Consult your supervisor and product and equipment labeling and warnings at all times for more specific or detailed requirements.

SCOPE

This Policy applies to the use of PPE pertaining to the service provided by employees of MMI to our Customers. The scope is subject to the conditions described in the Purpose paragraph above.

RESPONSIBILITIES

Management

MMI management is committed to the safety and health of our most valuable resource – you, our employees. MMI wants all employees to know that we will provide whatever PPE you need to do your job safely. If the necessary PPE is not currently available at your worksite, contact your supervisor immediately and we will provide the necessary PPE as soon as possible.

Supervisors

Supervisors have the primary responsibility for implementing and enforcing PPE requirements and use in their work area, including, but not limited to:

- Providing appropriate PPE and making it available to employees
- Training employees on the proper use, care, storage, and cleaning of PPE
- Inspecting PPE to see that it is properly maintained in appropriate and reliable condition.
- Identifying potential new hazards or when processes are added or PPE may need changed
- Replacing and disposing of defective or damaged PPE.

Employees

Employees are responsible for following the requirements of the PPE program, including, but not limited to:

- Properly wearing PPE as required
- Attending required training sessions
- Properly caring for, cleaning, storing, maintaining, and inspecting PPE as required
- Following program policies and rules
- Informing the supervisor of the need to restock, repair, or replace PPE.

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PROCEDURES

General Requirements

Appropriate PPE is required to be worn at all times when required by product warnings, Customer requirements or when employees are exposed to hazards that cannot be eliminated through the use of substitution, engineering, or administrative controls. The workplace will be periodically evaluated and all previously unidentified hazards will be addressed. Evaluation for possible PPE usage may include, but is not limited to:

- Eye and face protection (e.g. safety glasses)
- Head protection (hard hat)
- Foot protection (steel toe shoes)
- Hand protection (safety gloves)

- Hearing protection (ear plugs)
- Respiratory protection (respirator)
- Fall protection (safety harness)
- High visibility (reflective vest)

PPE appropriate for the identified hazards will be purchased and available to employees exposed to those hazards. Employees will make sure PPE properly fits before relying on it as a protective measure. If needed, training will be provided on the proper way to wear, use and maintain the PPE.

PPE Program Implementation

The following implementation steps will be used for this program:

- PPE assessment for each work task, assignment, or location
- Select appropriate PPE based on hazard assessment or product warnings
- Communicate PPE selection decisions to employees
- Provide PPE free of charge to all affected employees
- Train as needed and confirm employees' understanding of PPE usage
- Retrain and replace PPE as necessary; enforce PPE requirements

Eye and Face Protection

Use appropriate eye and face protection equipment when exposed to hazards from particles, liquids, gases, vapors, dusts, acids, caustics, and other potentially injurious chemical or physical hazards.

Foot Protection

Use protective footwear when working in areas where there is danger of objects falling on or rolling across the foot, piercing the sole, and where the feet are exposed to electrical or chemical hazards.

Hand and Body Protection

Use appropriate hand protection when hands are exposed to hazards from cuts, abrasions, punctures, chemical or thermal burns, harmful temperature extremes, vibration, and skin absorption of harmful substances.

Head Protection

Use protective head gear (hard hats, etc.) when working in areas where there is a potential for injury to the head from falling objects, impact hazards, extreme temperatures, or high UV levels.

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Hearing Protection

Use appropriate hearing protection where required by the Company or the Customer, or in environments where noise levels equal or exceed the OSHA Occupational Noise Exposure Standard (OSHA 29 CFR 1910.95) 8-hour time weighted average (TWA) of 85 Dba.

Respiratory Protection

Use of respirators when working in areas where respiratory hazards exist. All respirators will be in compliance with the OSHA 29 CFR 1910.134.

Retraining

The need for retraining will be indicated when:

- A worker's habits, or knowledge indicate a lack of necessary understanding, motivation or skills required to properly use the PPE
- New chemicals or equipment is introduced that requires new or different PPE
- Changes in the workplace make previous training inadequate
- Changes in the types of PPE to be used make previous training inapplicable
- Upon supervisor or Customer request.

Periodic Program Review

Management will conduct a periodic review to assess the PPE program. The review will consider the following:

- Safety incidents and accident investigations
- need for retraining of managers, supervisors, and employees
- jobs, processes or areas that have produced a high rate of injuries or safety incidents
- comparison of safety events to previous years
- Worker and supervisor feedback through interviews and questionnaires
- Any new products, equipment or job tasks that may require new or additional PPE

Outside Contractors

Whenever outside personnel are contracted to work on-site, supervisors will communicate all necessary PPE safety requirements to the contractor before any work commences.

Record Retention

Records will include employee's names, the training provided and the PPE typically used for the job site. All written hazard assessment, worker training, and incident investigation reports will be maintained for all affected employees exposed to the identified hazards. Where written JSA's are conducted the JSA's will also be maintained for each applicable work site.

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8. <u>BLOOD BORNE / INFECTIOUS PATHOGENS</u>

PURPOSE: This Policy applies to potential occupational exposures to blood or other potentially infectious materials arising from the services provided by the Company. This Policy outlines procedures to follow if blood or other potential infectious pathogen is encountered on the job.

SCOPE: This Policy addresses potential occupational exposure to blood or other potentially infectious materials. Certain regulatory agencies and our Customers may require all contractors who "reasonably anticipate exposure" of employees to infectious material to prepare and implement a written exposure control plan.

PRODEDURES: Managers and Supervisors will have overall responsibility for developing and implementing this exposure control Policy for all applicable facilities. Employees will conduct job site activities in accordance with this Policy, the Company's and Customer's work practices, and good personal hygiene habits.

Exposure Determination

- The Company believes there are no job classifications in which employees typically have occupational exposure to blood borne pathogens that may result from the performance of their routine duties. In addition, no medical sharps or similar equipment is provided to, or used by, employees performing their routine duties.
- Nonetheless, employees are instructed to be familiar with and follow this Policy in the event of a possible exposure to blood borne pathogens.
- This exposure determination does NOT mean that Personal Protective Equipment (PPE) should not be used by employees. In fact, all employees MUST use PPE when recommended by the Company, Customer policy, product handling instructions, and whenever blood borne pathogen or other workplace exposure risk may be encountered.

Work Practice Controls

- All body fluids should be considered potentially infectious.
- Employees shall thoroughly wash their hands immediately, or as soon as feasible, after removal of potentially contaminated gloves or other PPE.
- Following any contact of body areas with blood or any other infectious materials, employees shall wash their hands and any other exposed skin with soap and water as soon as possible.
- Needles, other sharp items, and any hazardous waste shall NOT be handled if you are not AUTHORIZED and TRAINED to do so. Needles and other sharps are not to be bent or recapped.
- Eating, drinking, smoking, applying cosmetics, lip balm, or contact lenses is prohibited in work areas where there is potential for exposure to biohazardous materials.
- Food and drink are not to be kept in refrigerators, freezers, on countertops or in other storage areas where potentially infectious materials are present.
- All equipment or environmental surfaces shall be cleaned and decontaminated after contact with blood or other infectious materials by employees using proper PPE.

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Customer health and safety representatives should be notified as soon as possible in the event
of a possible blood borne pathogen event or exposure. Blood borne pathogen kits should be
used by a trained Customer representative and any contaminated supplies and debris must be
handled with appropriate PPE and disposed as hazardous waste.

Personal Protective Equipment

When the possibility of injury by occupational exposure is present, PPE must be used by employees. If appropriate PPE is not available at the job site, employees must inform their supervisor immediately and PPE will be provided. When using PPE, employees must adhere to the following practices:

- Any garments containing blood or other infectious materials must be handled using gloves and eye protection and immediately removed and disposed of properly.
- Gloves must be worn whenever contact with potentially infectious materials is anticipated or when handling or touching contaminated items or surfaces.
- Gloves must be replaced as soon as practical after contamination or if torn, punctured or otherwise lose their ability to function as an "exposure barrier".
- Masks and eye protection (such as goggles, face shields, etc.) must be used when splashes or sprays may generate droplets of infectious materials.
- PPE must be cleaned, laundered and/or properly disposed of if contaminated.
- The Company will provide, repair or replace PPE as needed, and employees are responsible to inform the Company when those occasions arise.

Housekeeping

Employees must not handle blood borne pathogens or other hazardous materials unless fully trained and certified and authorized by the Company. However, if authorized by Company management and when using proper PPE, employees may:

- clean surfaces contaminated with blood or other potentially infectious materials.
- clean trash containers, pails, bins, and other receptacles if part of the defined scope of work.
- use non-contact, mechanical means (such as dustpan and brush, tongs, shovel, etc.) when cleaning up broken glassware or other containers.
- dispose of regulated waste, including blood borne pathogens, using proper containers in accordance with Customer directions and applicable federal and state regulations.

Post-Exposure and Follow Up

If potential exposure to bloodborne or other infectious pathogens has occurred to an employee, Company management or supervisor will investigate and provide a written summary of the incident and its causes and possible corrective actions. An appointment for the exposed employee with a qualified healthcare professional may also be arranged if necessary to determine the employee's medical status. This includes an evaluation of any reported illnesses, as well as any recommended treatment. Immediate communication by employees of all potential exposures to your supervisor is critical and required.

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9. HEAT AND COLD STRESS

PURPOSE

This Policy is designed to address the hazards associated with heat and cold-related conditions at the workplace. Heat or cold exposure can lead to illness, injury or even death. Employees are encouraged to take every precaution to guard against and avoid heat and cold stress and extreme temperature exposure on the job.

PREVENTING HEAT-RELATED ILLNESSES (HEAT STRESS)

Heat Stress

Heat stress takes place when the body's cooling system is overwhelmed. It can happen through high temperature alone or when heat combines with other factors such as:

- hard physical work
- fatigue (not enough sleep
- dehydration (loss of fluids)
- certain medical conditions
- exposure to extreme heat or humidity conditions on the job.

Heat Stress Symptoms

<u>Heat rash:</u> itchy red skin.

Heat cramps: painful muscle cramps.

<u>Heat exhaustion:</u> high body temperature; weakness or feeling faint; headache, confusion or irrational behavior; nausea or vomiting. Get immediate medical help if experiencing these symptoms.

<u>Heat stroke</u>: no sweating (hot, dry skin), high body temperature, confusion, or convulsions. Get immediate medical help if experiencing these symptoms.

Precautions When Working in Hot, Humid Conditions

- Increase the frequency and length of rest breaks in cooler conditions.
- Drink plenty of cool drinking water and increase the frequency of hydration.
- Limit the amount of time working in direct sunlight or hot conditions.
- Recognize the signs and symptoms of heat stress (see above).
- Keep watch on your fellow employees for symptoms of heat stress (people often don't recognize their own symptoms).
- Wear lighter clothing, consistent with Company and Customer policy and safety standards, to allow air to move freely and sweat to evaporate.
- Employees are authorized to immediately discontinue work and seek cooler conditions if experiencing heat stress symptoms.

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PREVENTING COLD-RELATED ILLNESSES (COLD STRESS)

Cold Stress

Cold conditions cause blood vessels in your skin, arms, and legs constrict, decreasing the blood flow to your extremities. This helps your critical organs stay warm, but your extremities are at risk for frostbite. **Frostbite** means that your flesh freezes. Blood vessels are damaged, and the reduced blood flow can lead to gangrene. Frostbite may initially be indicated by skin that looks waxy and feels numb. Symptoms may also include low body temperature, weakness, feeling faint, and confusion.

Wind chill accelerates heat loss from the body and the risk of frostbite. For example, when the air temperature is -20° F:

- with no wind, skin freezing (frostbite) unlikely
- with 10 mile/hour wind (will cause a flag to be fully extended), skin can freeze in about a minute.
- with 20 mile/hour wind (capable of blowing snow), your skin can freeze in 30 seconds.

When the body's core temperature drops significantly, there is a risk hypothermia. Early signs of hypothermia are shivering, blue lips and fingers, and poor coordination. Breathing and heart rate will slow, and disorientation and confusion may occur. Hypothermia requires immediate medical help.

Precautions to Prevent Cold Stress

- Wear several layers of clothing rather than one thick layer.
- Wear gloves and a hat to reduce heat loss from the body.
- Take warm, high-calorie drinks and food.
- If your clothing gets wet, change into dry clothes immediately.
- If you start to feel warm, open your jacket but keep your hat and gloves on.
- Get out of the cold or wind and take warm-up and rest breaks in a heated location.
- Recognize the signs and symptoms of cold stress (see above).
- Keep watch on your fellow employees for symptoms of cold stress (people often don't recognize their own symptoms).
- All employees are authorized to immediately discontinue work and seek warmer conditions if experiencing cold stress symptoms.

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10. HOUSEKEEPING

PURPOSE

The purpose of this Policy is to provide procedures that should be used in defining and managing housekeeping standards at MMI designated areas at our Customer's facilities. Where local regulations or Customer requirements are more stringent than this requirement, those regulations and requirements supersede these standards.

SCOPE

This requirement applies to all Company designated work areas at our Customer's facilities. Employees are reminded that we are Guests on our Customer's Property, and we are only using designated custodial closets and storage spaces because of our Customer's permission. Employees must therefore maintain those areas in a safe, clean, neat, and respectful manner.

REQUIREMENTS

- The storage space and closets designated for use by MMI employees must be kept in a suitable, clean, safe and tidy condition.
- MMI custodial closets and storage areas must be kept organized with all chemicals properly labeled and SDS documentation readily available.
- Personnel protective equipment will be secured in the MMI storage areas and readily available for daily usage by employees.
- Floors in MMI janitor closets and storage areas must be kept dry and free of hoses, cords, boxes, stored materials, and other potential slip or trip hazards.
- Shelves must be secure and not over weight capacity, or with risk items falling from the shelves.
- MMI materials and equipment may not be left in staircases, hallways, walkways, or doorways or any other common areas.
- Ladders, step stools and other equipment should be secured and not left leaning.
- Supervisors will conduct periodic inspections of MMI closets and storge areas and will inform employees of any housekeeping corrections or improvements to be made.
- Employees are again reminded that we are Guests on our Customer's Property, and we are only
 using the closets and storage spaces with our Customer's permission. Employees must therefore
 maintain those areas in a safe, clean, neat, and respectful manner.

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11. FIRST AID

PURPOSE

The purpose of this Policy is to describe MMI's commitment to assisting employees with receiving first aid or other medical attention for injuries that may occur at work, as part of the Company's development of an overall safe working environment.

PROCEDURES

First Aid Kits

Most Customer location have a first aid kit available to treat minor workplace injuries or illnesses. The Company will also provide a First Aid Kit on the work site if needed. First Aid kits are to be used for the employee's treatment of minor scratches, burns, headaches, nausea, etc., occurring at the workplace. All employees shall know the location of the First Aid Kit and shall notify their supervisor if they need to use the First Aid Kit. Even though you may believe the injury or illness in minor, please make sure you inform your supervisor.

Injury Beyond First Aid Treatment

If a work-related injury or illness requires professional medical assistance, employees must:

- notify your supervisor as soon as possible;
- follow instructions of your supervisor regarding the location of the nearest Med Express or other facility for obtaining medical assistance;
- if a SERIOUS INJURY, GET IMMEDIATE MEDICAL ATTENTION do not wait. Thereafter, contact your supervisor when possible after the medical condition has been treated and stabilized.
- provide information to your supervisor for the completion of the accident investigation report.

MedExpress

MMI has an affiliation with MedExpress urgent care centers. If an employee requires more than simple first aid, use MedExpress if convenient and identify yourself as an MMI employee. If an emergency or your injury is serious, proceed immediately to the nearest medical facility for treatment.

First Aid Training

First aid and medical facilities will be made available on site or nearby. In the absence of medical facilities workers on each shift will be identified if certified in first aid and CPR to provide adequate first response medical care. Each designated first aider will have a valid certificate in first aid training from an authorized organization.

First Aid Kits

The Company provides a First Aid Kit on the premises. It is there for employee use in the treatment of minor scratches, burns, headaches, nausea, etc. Employees shall know the location of the First Aid Kit and shall notify their supervisor if they need to use the First Aid Kit. If an employee has a work-related injury or illnesses that requires professional medical assistance, they will notify their supervisor as soon as possible.

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Medical Treatment

For non-emergency work-related injuries requiring medical assistance, supervisors must first authorize treatment. For an injury requiring treatment other than first aid, employees shall:

- Inform their supervisor
- Provide details for the completion of the accident investigation report
- use the nearest wash facility or eyewash station in the event of a spill or splash of injurious chemicals or liquids on their clothing or body

If a worker sustains a severe injury requiring emergency medical treatment:

- Injured workers should call for help and seek assistance from a co-worker, supervisor or Customer facility personnel immediately, if able.
- If available, a first aid provider will render emergency first aid and request assistance for transportation to the nearest medical facility
- Prior to the start of a job, the Company will inform employees of the arrangements in place to locate or transport injured workers from the jobsite to the nearest health care facility.

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12. WORK SITE SECURITY / WORKING ALONE

PURPOSE

The purpose of this Policy is to provide safety guidance to employees with respect to the physical security of the Customer's work site, particularly when employees are working after normal hours, or with few or no other workers on site, or where work may be performed in an isolated setting.

SCOPE

The scope of this Policy considers employees who may be working where no other personnel may be able to assist in the event of an emergency, including when employees are alone on the work site. Employees may be considered "working alone," when:

- they are on their own at work no co-workers are at the work site
- they cannot be seen or heard by another person
- emergency assistance is not readily available.

This Policy is designed to address some of the physical security considerations and potential risks of working at our Customer's facilities when few other personnel may be present, or when working completely alone, in the event an employee might be injured, trapped, threatened, or unconscious, or may be difficult to locate.

PROCEDURES

Planning

Employees must consider and recognize potential hazards at their work site, particularly when working alone. Hazard recognition considerations should include:

- Initial employee training to help identify potential hazards at the work site
- Awareness of and compliance with all Customer safety warnings at the work site (such as "No Entry", "Electrical Hazard", designated walkway markings, Use Handrail, PPE requirements, etc.)
- Knowledge of all exits from the work site location in the event of an emergency
- Knowledge of the location of first aid and emergency supplies
- A family member or other contact person must be aware of your work schedule
- While personal use of cell phones at work is not permitted except for emergencies or to contact
 your supervisor, it is recommended that employees keep their mobile phone with them while
 working alone in the event of an emergency.
- In some situations, such as confined spaces, regulations under the *Occupational Health and Safety Act* prohibit entry or work without another person standing by outside the area. Employees working alone may NOT enter an area or provide service where another worker is required by regulation or work site policy.
- All MMI employees are strictly prohibited from entering confined spaces, whether working alone or not. Confined space activities are beyond MMI's scope of work for our Customers.

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Work Site Security

All employees must be aware of the building and grounds of the Customer's facilities where they work. This includes parking lots, entry doors, locks, and alarm systems. With respect to work site security, the following control measures must be followed by all employees, especially those working alone:

- **Parking** Employees should always park in a well-lighted area, as close as possible to the work site building, in a proper parking spot (not a fire lane, etc.), and make sure your car is locked.
- Work Site Door Entry Keys and access key cards should be ready to use as soon as you reach the entry door, so that the time outside the work site facility is minimized. Never allow anyone else use the keys and access cards assigned to you for entry to the Customer's facility. If a key or access card is lost, employees must notify their supervisor immediately.
- Third Party Access As all MMI employees know, we are guests on our Customer's property. Therefore, employees may NEVER allow third parties access to the Customer's facility (other than police, fire, first responders, etc.). This includes family members or those who claim to be employees of the Customer. If anyone (other than an MMI employee who is known to you) requests access to the work site, you must refuse that request and contact your supervisor immediately, for your safety and the safety of our Customer's operations.
- Alarm systems If the Customer has a security system at the work site, employees may be trained on the operation of that system as part of the initial work site orientation. Unless otherwise instructed by the Customer or MMI, employees should re-set the security system after entering the facility. This will help re-secure the facility for your protection and the protection of the Customer's operations. If so instructed, employees must also re-set the security alarm system when exiting the building. If there is an unintended activation of the alarm system or the system cannot be activated, employees must contact their supervisor immediately.
- **Emergency Contact** If the Customer's facility has an emergency call number or other emergency contact procedure, employees will be advised of the procedure as part of the initial work site orientation. In the event of an attempted intrusion or other emergency, employees must follow the Customer's emergency procedure and immediately thereafter contact their supervisor.

This Policy provides certain steps that can be taken to reduce or eliminate potential risks when working alone or in isolation but is certainly not exhaustive. There may be other risk mitigation procedures identified by the Customer or your supervisor which employees should implement regarding the hazards specific to their work sites. See **Appendix B** for a checklist of safety considerations for Employees Working Alone.

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13. <u>SUBCONTRACTOR SAFETY MANAGEMENT</u>

PURPOSE

MMI believes that our own selected and trained employees provide the safest and highest quality service to our Customers. At times, however, MMI may retain subcontractors to provide specific services as may be needed by the Customer. This Policy addresses certain safety considerations regarding those subcontractors that may be occasionally retained by the Company.

POLICY

Subcontractors of MMI will be selected and managed in a manner consistent with the overall Company safety objectives, policies, and procedures a set forth in this Manual. Selected subcontractors will be provided a copy of this Manual and agree to conduct their activities consistent with these Policies.

PROCEDURES

Subcontractor Selection

<u>Appendix C</u> is a Questionnaire to capture subcontractor information noted within this section to be used in the subcontractor evaluation and selection process.

Experience Modification Rate ("EMR")

Prospective subcontractors will furnish their EMR for the past three years. This information should come directly from the subcontractor's insurance broker. An EMR greater than 1.0 can indicate an employer with a high frequency and/or severity of workers compensation claims. In the event of an EMR greater than 1.0, a more detailed evaluation of their safety program is required.

OSHA Logs / Citations

Prospective subcontractors shall submit copies of OSHA logs (or equivalent summary data) for the previous three years and applicable hours of exposure. Incident frequency and severity rates should be examined and compared for acceptability with:

- incident rates for relevant work sites (if available)
- Industry average incident rates for their Standard
- Industrial Code (SIC or NAICS code) as published by the Bureau of Labor Statistics
- incident rate specified by the Company or the Customer
- Industry best practice or other standard determined by the Company.

The prospective subcontractor shall be required to provide information (reason, corrective action, and fines) regarding OSHA citations during the past three years. A history of frequent violations, infrequent but repeated violations, or violations applicable to the work to be performed would warrant further investigation.

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Evaluation of Subcontractor Safety Program

The prospective subcontractor shall demonstrate that their safety program meets or exceeds the Company's safety program requirements, industry standards or governing jurisdiction. The following areas that shall be addressed by the subcontractor include, without limitation:

- an industry specific safety program, not generic, responsive to the exposures prevalent in the industry and anticipated on the prospective project
- elements of supervisor accountability for safety, accidents, and claim costs
- safety meetings should be held regularly with documentation as to the subject, who attended, and a review of past losses
- safety audits (inspections) to be conducted by the subcontractor on a regular basis.
- audit results documented to identify deficiencies and corrective action taken
- worker safety training program, including documentation thereof.
- certificates of insurance for the subcontractor's general liability, umbrella, and workers compensation insurance coverages, naming of the Company as additional insured, shall be provided prior to any work beginning by the subcontractor.

Pre-Job Planning

Once the subcontractor is selected but before the work begins, Company and the subcontractor will review the scope of the subcontractor's work, the sequence of the work and potential work site hazards. Subcontractors responsibilities will include, without limitation:

- tools and equipment expect to be used in the performance of the work
- all necessary personal protective equipment (PPE), training on its use, and enforcement of PPE usage at the worksite
- housekeeping and debris removal efforts and prevention of disruptions
- protection of Customer equipment, operations, and personnel at the work site
- identifying key contacts and responsible supervisors of the subcontractor for the work
- defining the roles and responsibilities of other employees of the subcontractor at the site
- reporting and recordkeeping of incidents/injuries including near misses
- reporting incidents/injuries/near misses immediately or as soon as possible to the Company.
- Subcontractor's notification and recordkeeping procedures and requirements.

Actions During Performance of the Work

Subcontractors may also be required to perform the following safety activities as part of the work:

- Safety Meetings
- Training Sessions
- Safety Audits
- Work Observations/site inspections
- Job Safety Analysis

- Hazard Analysis
- Injury Intervention Processes
- Root Cause Analysis
- Client-Required Programs
- Post-job review

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14. LADDER SAFETY

PURPOSE

The purpose of this Policy is to set forth certain limitations and precautions regarding the use of ladders by MMI employees. Ladders and any item used to raise employees off the floor can create a significant safety hazard and, as a result, the use by MMI employees is strictly limited.

POLICY

MMI employees may not exceed an elevation of 5 feet from the ground while on a ladder UNLESS (1) approved by MMI management, (2) appropriate training is provided and successfully completed, and (3) fall protection/prevention equipment is used by the employee. If ladder usage is approved, MMI employees may only use ladders that are labeled, designed and manufactured in accordance with the American National Standards Institute. Under no circumstances are portable ladders to be used unless conditions are considered safe, secure and in compliance with OSHA and company procedures and safe work practices. Chairs, desks, boxes, vehicles, or other items may never be used as a means of elevation by MMI employees

PROCEDURES

MMI Ladder Safety requirements include without limitation:

- Employees must inspect ladders prior to use. Use of ladders with broken or missing rungs or steps, broken or split side rails, or other faulty or defective construction is prohibited. All rungs, cleats, and steps will be parallel, level and uniformly spaced when the ladder is being used.
- Employees will face the ladder and will not carry material or tools while ascending or descending.
- Ladders will not be loaded beyond the maximum the manufacturer's rated capacity.
- All ladders shall be placed on secure footing, and areas around the top and bottom will be kept clear.
- Planks will not be used with stepladders; ladders shall not be spliced together.
- Ladders will not be used in a horizontal position as a platform, runway or scaffold.
- Ladders shall not be placed in front of doors, unless door is blocked, barricaded, and guarded.
- Ladders shall not be placed on scaffold, boxes, boards, barrels, or other unstable bases or surfaces.
- Any ladder with a slippery or caustic substance must be thoroughly cleaned and dry prior to use.
- No ladder shall be used to gain access to a roof or interior roof supports or utilities.
- Metal ladders will not be used for electrical work or where they may contact electrical conductors.
- Chain, rope, or extension ladders are never permitted; ladders shall not exceed 10 feet.
- All ladders will be tied off on top, blocked or otherwise secured to prevent movement before work.
- Only one employee is to work on or climb a ladder at the same time.
- All work done from a ladder shall be within an individual's normal reach and with no overextension.
- Employees are not permitted to stand or work from the top two rungs or cleats of a ladder.
- All work done from a ladder that exposes a worker to a fall potential of 5 feet or more requires the worker to wear a harness and be tied off with fall protection equipment.

Employees must strictly comply with, and supervisors will monitor and enforce, compliance with this Policy

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15. STOP WORK AUTHORITY

PURPOSE

The purpose of this Policy is make clear that all employees have the responsibility and authority to Stop Work when they believe that a situation exists that places them, coworker(s), contractors, or the public, or the Customer's facilities or operation, in an unsafe situation relating to the service provided by MMI.

SCOPE

This Policy applies to all Company locations as well as our Customer's work sites and facilities. It is applicable to all MMI employees working at these locations and includes situations, that if allowed to continue, could create risks of bodily harm, adversely affect the safe operation or cause serious damage to a facility or equipment, or adversely affect the environment.

RESPONSIBILITIES

All employees have the right and obligation to stop any job or task when there are questions or concerns regarding the ability to avoid the risk of hazards or unsafe acts. MMI promotes and supports use of Stop Work Authority (SWA) without for retribution for actions taken in good faith. Supervisors and managers will honor SWA requests and resolve the potential safety issue before resuming operations.

PROCEDURES

A Stop Work intervention should be initiated for conditions or behaviors that could reasonably be expected to pose a risk or danger to worker(s), safe operation of a facility, serious damage to equipment or adversely affect the environment. Situations that warrant a Stop Work intervention may include, but are not limited to:

- Suspected unsafe conditions
- Uncertainty regarding changes in conditions
- Uncertainty regarding changes to scope of work or work plan
- New equipment or equipment used improperly
- Lack of knowledge, understanding or information
- Need for clarity regarding work instructions
- Propose additional safety controls or procedures.

Steps of Stop Work Authority

- <u>Stop</u> an employee perceiving conditions or behaviors that pose imminent danger must immediately initiate a stop work intervention.
- <u>Notify</u> that employee must immediately notify their supervisor of the stop work action and the specific reason for the action.
- <u>Investigate</u> the employee initiating the SWA will provide all relevant information regarding the SWA to the supervisor and will assist the supervisor's investigation of the acts or conditions causing the SWA.

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- <u>Correct</u> the employee and the supervisor will take actions as soon as possible to rectify the known unsafe act or condition and prevent a recurrence of the unsafe act or condition, in coordination with site management of the Customer if necessary.
- <u>Resume</u> All affected employees will be notified of the corrective actions implemented and work
 will resume only when it is safe to do so and when the unsafe issues and concerns have been
 addressed.

Documentation

All SWA will be documented for lessons learned and corrective actions taken, and to evaluate effectiveness of the program and identify areas for improvement.

Management will review SWA documentation to measure the quality of SWA interventions and corrective actions, establish trends, and communicate potential opportunities for improvement across the Company.

The Company places a high importance of follow-up after a Stop Work Intervention has been initialed and closed. It is the desired outcome of any Stop Work Intervention that the identified safety concern(s) have been addressed to the satisfaction of all involved employees prior to the resumption of work. Most issues can be adequately resolved in a timely manner at the job site; occasionally additional investigation and corrective actions may be required to identify, address and correct root causes.

<u>Appendix D</u> contains a Stop Work Authority Form which may be used to document a Stop Work Authority event initiated which requires investigation and/or corrective action.

Training

Employees will be informed and trained regarding this Policy and their right and responsibility to initiate a Stop Work in the event of suspected unsafe acts and/or conditions.

Supervisors and management will be trained that there shall be no retaliation against an employee for asserting an SWA in good faith.

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16. <u>INCIDENT INVESTIGATION POLICY ("12 Hour Form")</u>

PURPOSE

The purpose of this Policy is to provide guidelines for the investigation of incidents that resulted, or may in the future result, in an injury or illness, or expose to unreasonable risk. The goal of this Policy is to help understand the cause of the safety incident and correct any unsafe act and condition that lead to the incident.

POLICY

All safety incidents, including work-related injuries, accidents, near misses, and property damage will be reported and investigated to determine root causes, and recommendations will be developed and implemented to prevent recurrence of the incident. This Policy applies to all Company employees and subcontractors, who are required to report all safety incidents to Company management as soon as possible.

RESPONSIBILITIES

Management

- Management will participate in the investigation of all safety incidents.
- Management will review all accidents/injuries of employees and implement corrective action and safety modification and/or employee training as recommended by the incident investigation.
- Management will coordinate case management, accident/incident processes, investigation methods, and reporting according to Company guidelines.

Supervisors

- supervisors shall conduct the investigation of the incident in a manner that is timely and appropriate to the circumstances and severity of the incident.
- supervisors will immediately report accidents and near misses to management, perform an initial investigation, and timely submit an Incident Report within 12 hours of the incident.
- supervisors will instruct new and returning employees of the requirement to report all safety incidents including near misses.
- Supervisors will monitor corrective actions as appropriate to remedy an unsafe working condition, facility, equipment, location, or practice.

Employees

- Employees are responsible for immediately informing their supervisor of accidents, near miss events, unsafe conditions, unsafe equipment, and known unsafe practices.
- Employees shall participate in the incident investigation unless they are unable to do so as a result of injury.
- Employees will assist in the investigation of an incident with supervisors and other managers.
- Employees will participate in training and the implementation of other responses to the incident to help avoid future incidents and improve and maintain overall safety performance.

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PROCEDURES

Training

All personnel will be trained in their responsibilities for incident reporting, response, and investigation before performing any work. It is the responsibility of the supervisor to ensure all affected employees are properly trained in accident/incident investigation processes and Company reporting criteria.

Incident Investigating Procedures

All safety incidents are to be investigated in a timely manner (no more than 24 hours if possible) to determine the root cause(s) and contributing factors involved. The extent of the investigation depends on several factors including the severity or potential severity of the incident, number and availability of witnesses, the extent of access permitted by the Customer, etc.

<u>Initial Response to the Incident</u>: If the incident results in an employee injury or illness, the primary goal is to make sure that the affected employee receives immediate medical attention. Action should be taken to prevent or minimize the risk of additional injury or illness in the area.

<u>Secure the Incident Scene</u>: The scene of the event should be left intact to the extent possible and consistent with site safety and Customer requirements. Use of barricades, signs, or other means to isolate the site, warn of hazards, and otherwise restrict access may be implemented as approved by site management. If possible, preserve the site to provide key information about the incident (who, where, what, when how and why).

<u>Witnesses</u>: Identify potential individuals who were involved in the event or saw it happen. Interview witnesses individually and as soon as possible after the event. Document the statements made in the interviews and if possible, have the witnesses sign the statements.

Supervisor's Safety Incident Report ("12 Hour Form")

Complete the initial written reporting of the incident investigation by preparing and sending to MMI management the Safety Incident Report ("!2 Hour Form"). (See <u>Appendix E</u> - 12 Hour Incident Investigation Form.) Company management will review each Incident Report, identify additional investigation that may be needed, proposed corrective actions that may be implemented, and longer-term follow-up actions that may be required, with adequate schedule and resources for completion.

Reporting Requirements

The Company will report fatality, other catastrophic incidents, in-patient hospitalization, amputation, or eye loss as soon as possible, but within the time period prescribed by OSHA regulations (8 – 24 hours) and any state law requirements. Any environmental incident that occurs will be reported as required by local, state, and/or federal regulation.

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17. <u>RECORDS RETENTION</u>

PURPOSE

The purpose of this Policy is to provide guidelines regarding the documentation and retention of health, safety, and environmental records of the Company in support the Company's priority of the health and safety of our employees and our community and our responsibilities under the Occupational Safety and Health Act (OSHA) and other applicable regulations.

SCOPE

This Policy applies to employee and other health and safety records identified in this Policy Manual. The Company will preserve and provide access to such records as required by applicable law and regulation.

Record Keeping

Company Human Resources management is responsible for maintaining and providing access to employees' records. Any medical or employee exposure records in the possession of MMI will be kept separately from other employee records and will be retained in accordance with company, state, and/or federal requirements, as applicable, but in any event not less than 7 years.

Access

Employees or their designated representatives have the right to request access to his/her medical records. The company shall assure that access is provided in a reasonable time, place, and manner. Employees may access his/her records by making a specific written request to the Company's Human Resources management, identifying the specific records requested.

Medical records are records concerning the health status, testing, exposure, diagnosis, treatment, or monitoring of an employee which is made or maintained by a physician, nurse or other health care provide or technician. Employees are advised that the Company does not routinely have medical records of employees. It is recommended that employees contact their health care provider or insurance company to obtain their medical records.

Transfer of records

In the event of a transfer of the business, the Company transfer all records subject to this section to the successor company. The Company will comply with Code of Federal Regulation, Title 29, Part 1910.1020 with respect to the transfer or records or the business.

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18. ERGONOMICS POLICY

PURPOSE

The purpose of this Policy is to define a process that will help reduce or eliminate hazards that contribute to the development of Musculoskeletal injuries (MSI), disorders that are caused, precipitated, or aggravated by repetitive motions.

PROCEDURES

Procedures to be utilized to achieve reduction or elimination of MSI will include:

- Worksite evaluations
- Employee and supervisor training
- Implementation of ergonomic control strategies
- Provide continuous, on-going ergonomic approach.

Non-work activities can also cause or contribute to discomfort and medical impairments, so employees are urged to apply ergonomic principles outside the workplace as well.

RESPONSIBILITIES

Supervisors:

- Supervisors will provide employees with appropriate ergonomics recommendations, training, reinforcement, and assistance, including:
- Promote a safe and healthy work environment
- Educate on awareness of MSI risks
- Evaluate the work environment for proper ergonomic practices and conditions.
- Promptly report all employee injuries and employee complaints regarding MSI symptoms
- Provide proper equipment and assistive devices as needed
- Coordinate and schedule ergonomic evaluations to reduce cumulative trauma injuries
- Evaluate individual work process after complaints of MSI symptoms
- Review and update the Ergonomics Program to comply with state and federal regulations.

Employees:

- Employees are responsible for conducting themselves in accordance with this Policy and all other safe work programs of the Company. In addition, employees are responsible for the following:
- Adjust and use their cleaning equipment as recommended to avoid MSI
- Perform simple exercises and stretches and take breaks to avoid excessive repetitive motion
- Actively participate in training as required, and apply the knowledge and skills acquired to actual jobs, tasks, processes, and work activities.
- Immediately report MSI symptoms and work-related injuries to your supervisor.

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19. FIRE PROTECTION

PURPOSE

The Company's Fire Protection Policy has been developed to be consistent with all related regulations and standard safe work practice. The purpose of this Policy is to create awareness to avoid fires and to provide guidelines for action if a fire does occur. This Fire Protection Policy includes elements of the following Policies:

PPE Policy / Electrical Safety Policy / Emergency Action Plan

POLICY

This Policy outlines actions to take in the event of a workplace fire, including notification and evacuation procedures and is in addition to our Customer's requirements in the event of a fire. Employees shall be aware of and comply with all such policies. At no time does the task of fighting fire supersede an employee's <u>primary duties</u> of:

- Ensuring your own personal safety and the safety of others
- Reporting the incident to the proper authorities and ensuring accountability for yourself and coworkers and other persons, in accordance with Company and Customer policy.

PROCEDURES

- All workers are responsible for good housekeeping practices to support fire prevention activities
- Supervisors and employees will be held accountable for the housekeeping of their job sites
- Combustible and flammable liquids shall be handled and stored in approved containers, cabinets, and areas that are designed for fire prevention
- All combustible and flammable materials will be handled and stored in compliance with applicable labelling, regulations, and client requirements. The quantity of flammable/combustible material shall be kept to a reasonable amount on the job site
- Oily rags shall be immediately disposed of in designated hazardous waste containers
- No hot work is to be performed without a Hot Work Permit
- All vehicle entry into process areas requires a permit or permission from the Customer
- Use bonding straps to discharge and prevent static charges during transfer of flammable liquids from one container to another
- Report all spills or suspicious odors immediately
- NEVER put yourself or others at risk while attempting to extinguish a fire
- DO NOT USE any fire hoses larger than 1-3/4", unless fully trained as an industrial firefighter
- NEVER attempt to extinguish a pressurized fuel fed fire
- **DO NOT** direct a fire nozzle with a straight stream at any type of LPG fire. This action could extinguish the fire, producing an LPG vapor cloud capable of detonation
- **DO NOT APPLY** water to any acid or caustic release as it can cause a violent reaction, or become extremely corrosive, causing an increasing leak condition.

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FIRE EXTINGUISHER TRAINING

Any MMI employee designated to use a portable fire extinguisher at a job site will be trained on the use of the available extinguishers, with Customer approval. Portable fire extinguishers should be kept in areas easily accessible and only approved fire extinguishers may be used by trained employees. Fire extinguishers must have an inspection tag attached, maintained in a fully charged, ready to operate state, and are to be inspected regularly with documentation supporting the inspection schedule. Training will be provided to all MMI workers who designated to use fire extinguishers. Fire extinguisher training will include general principles of fire and extinguisher use, and the hazards involved with incipient stage firefighting, and will include, without limitation, information regarding the following:

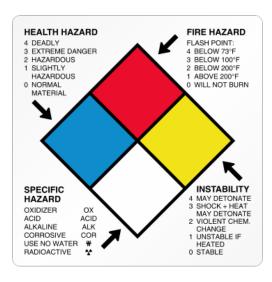
Classes of Fires

- Class A Ordinary combustibles (wood/paper/textiles)
- Class B Flammable liquids (gasoline/oils/grease)
- Class C Live electric (wiring/generators/motors)
- Class D Combustible metals (finely divided form/chips, turnings)
- Class K Kitchen (oils/grease)

Types of Fire Extinguishers

- Water extinguisher for ordinary combustible fires
- Dry Chemical or CO2 extinguisher for electrical equipment fires and for flammable liquid fires
- Multipurpose Dry Chemical extinguisher for ordinary combustible fires, liquid fires, and electrical equipment fires
- Foam extinguishing agent for hydrocarbon fires

Familiarity with product labeling which may show the types of fire risk associated with that product (NFPA Diamond):



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20. TOOL SAFETY

PURPOSE

The purpose of this Policy is to outline safety procedures surrounding the use of Hand and Power Tools if used by Company employees. This program covers hand and standard electrical power driven tool safety which may be encountered by employees on the job site.

SCOPE

The Company has detemined through risk assessment that employees do not encounter a greater than normal risk of electrical hazard while coducting their work activities at the Custoemr's facilities. This Policy is intended to address the possibility that electrical power tools may be encounterd by certain employees on the jobe site. In all cases, however, this Policy prohibits and does not cover pnuemantic or hydrulic powered tools, power actuated tools, abrasive or other wheel grinders, or overhead power lines, as employees are prohibited in all cases from operating such tools or working on such items.

POLICY

Employees who use hand and power tools and who are exposed to the hazards of falling, flying, abrasive and splashing objects, or exposed to harmful dusts, fumes, mists, vapors, or gases must be provided with the personal equipment necessary to protect them from the hazard. This Poklicy is designed to address hazards involved in the use of such by the following:

- Keep all tools in good condition with regular maintenance
- Use the right tool for the job
- Examine each tool for damage before use
- Operate according to the manufacturer's instructions.
- Provide and use the proper protective equipment

Tools shall be maintained in safe condition. Any tool which is not in compliance shall be identified as unsafe by tagging and or locking the controls to render the piece of equipment inoperable or the tool shall be physically removed from its place of operation.

RESPONSIBILITIES

Management

- Provide correct tools for assigned tasks
- Ensure tools are maintained and stored safely
- Provide worker training
- Provide for equipment repair

Employees

- Follow proper tool safety guidelines
- Report tool deficiencies and malfunctions
- Properly store tools when work is completed

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Administrative

- Tool sharpening program
- Use of PPE
- Control of tool issue
- Worker Training
- Controlled access to equipment and tool areas

Ergonomic Guidelines

- Use the right tool for the job, and the right tool for the user
- Avoid high contact forces and static loading
- · Reduce excessive gripping force or pressure
- Avoid extreme and awkward joint positions
- Avoid twisting hand and wrist motion by using power tools rather than hand tools
- Avoid repetitive finger movements, or at least reduce their number
- Minimize the amount of force needed to activate trigger devices on power tools
- Use two or three-finger triggers for power tools.

Hand Tools

Hand tools are non-powered (such as screwdrivers or wrenches). The greatest hazards posed by hand tools result from misuse and improper maintenance. Some examples:

- Using a screwdriver as a chisel may cause the tip of the screwdriver to break and fly, hitting the user or other workers.
- If a wooden handle on a tool such as a mop is loose, splintered, or cracked, the handle may break or splinter and injure the user or strike another worker.
- A wrench must not be used if its jaws are sprung or loose, causing a slip.

Workers using hand and power tools and exposed to the hazard of falling, flying, abrasive, and splashing objects, or exposed to harmful dust, fumes, mists vapors, or gases shall be provided with PPE necessary to protect them from the hazard. Appropriate personal protective equipment, e.g., safety goggles, gloves, etc., should be worn due to hazards that may be encountered while using portable power tools and hand tools.

Around flammable substances, sparks produced by iron and steel hand tools can be a dangerous ignition source. Where this hazard exists, spark-resistant tools made from brass, plastic, aluminum, or wood will provide for safety.

Power Tool Precautions

Power tools can be hazardous when improperly used. The following general precautions should be observed by power tool users:

- Never carry a tool by the cord or hose.
- Never yank the cord or the hose to disconnect it from the receptacle.

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- Keep cords and hoses away from heat, oil, and sharp edges.
- Disconnect tools when not in use, before servicing, or when changing attachments
- All observers should be kept at a safe distance away from the work area.
- Secure work with clamps or a vise, freeing both hands to operate the tool.
- Do not hold a finger on the switch button while carrying a plugged-in tool.
- Follow instructions in the user's manual for lubricating and changing accessories.
- Be sure to keep good footing and maintain good balance.
- The proper apparel and PPE must be worn. Loose clothing, ties, or jewelry can become caught in moving parts.
- All tools that are damaged shall be removed from use and tagged "Do Not Use."

Guards

Hazardous moving parts of a power tool need to be safeguarded, such as belts, gears, shafts, pulleys, sprockets, spindles, drums, fly wheels, chains, or other reciprocating, rotating, or moving parts of equipment must be guarded to protect the operator and others from the following:

Guards shall be always in place and operable while the tool is in use. The guard may not be manipulated in such way that will compromise its integrity or compromise the protection in which intended. Guarding shall meet the requirements set forth in ANSI B15.1.

Safety guards and safety switches must never be removed when a tool is being used. For example, portable circular saws must be equipped with guards. An upper guard must cover the entire blade of the saw. A retractable lower guard must cover the teeth of the saw, except when it contacts the work material. The lower guard must automatically return to the covering position when the tool is withdrawn from the work.

Electrical Safety

Among the chief hazards of electric-powered tools are burns and shocks which can lead to injuries or even heart failure. To protect the user from shock, power tools must either have a three-wire cord with ground or be grounded, be double insulated, or be powered by a low-voltage isolation transformer. Three-wire cords contain two current-carrying conductors and a grounding conductor. One end of the grounding conductor connects to the tool's metal housing. The other end is grounded through a prong on the plug. Anytime an adapter is used to accommodate a two-hole receptacle, the adapter wire must be attached to a known ground. The third prong should never be removed from the plug.

Electric Power Tool General Safety Practices:

- 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 lighted.

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Power tool users shall use either ground fault circuit interrupters or an assured equipment grounding conductor. These requirements are in addition to any other requirements for equipment grounding conductors.

Ground-Fault Circuit Interrupters (GFCI)

All 120-volt, single-phase 15- and 20-ampere receptacle outlets on construction sites, which are not a part of the permanent wiring of the building or structure, and which are in use by workers, shall have approved ground-fault circuit interrupters for personnel protection. Receptacles on a two-wire, single-phase portable or vehicle-mounted generator rated not more than 5kW, where the circuit conductors of the generator are insulated from the generator frame and all other grounded surfaces, need not be protected with ground-fault circuit interrupters. 1926.404(b)(1)(ii)

Powder-Actuated Tools

Powder-actuated tools can create special safety risks and must be treated with respect and in compliance with all warnings and precautions, especially if designed to dispense objects (such a nails, staples, etc.).

Powder-Actuated Tool Safety

- Power-actuated tools may only be operated by specially designated and trained workers; if you
 have not been so designated and trained you may not use power-actuated tools at your worksite.
- Power actuated tools may not be used in an explosive or flammable environment.
- If authorized by MMI management to use a power-actuated tool, the tool must first be disconnected from the power source and thereafter carefully inspected before use, following all instructions for safe handling and inspection.
- Inpsection should include determining that the tool is clean, that all moving parts operate freely, and that the mechanisims are free from obstructions.
- The tool should never be pointed at anybody or operated where it could stike another person.
- The tool is desgned to be loaded, it must only be loaded when it will be used immediately. A loaded tool must not be left unattended, especially if accessible to unauthorized persons.
- Hands should be kept clear of the barrel end. To prevent the tool from firing accidentally, two
 separate motions are required for firing: one to bring the tool into position, and another to pull
 the trigger. The tools must not be able to operate until they are pressed against the work surface
 with a force of at least five pounds greater than the total weight of the tool.
- Suitable PPE (including eye and face protection) are essential when using a powder-actuated tool.

For a tool designed to be loaded, the muzzle end of the tool must have a protective shield or guard centered perpendicularly on the barrel to confine any flying fragments or particles that might otherwise create a hazard when the tool is fired. The tool must be designed so that it will not fire unless it has this kind of safety device. All powder-actuated tools must be designed for varying powder charges so that the user can select a powder level necessary to do the work without excessive force.

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Powder-Actuated Tool Fasteners

When using powder-actuated tools to apply fasteners, there are some precautions to consider. Fasteners must not be fired into material that would let them pass through to the other side. The fastener must not be driven into materials like brick or concrete any closer than three inches to an edge or corner.

In steel, the fastener must not come any closer than one-half inch from a corner or edge. Fasteners must not be driven into very hard or brittle materials which might chip or splatter or make the fastener ricochet.

An alignment guide must be used when shooting a fastener into an existing hole. A fastener must not be driven into a spalled area caused by an unsatisfactory fastening.

Inspection

Employees shall make sure to inspect tools before using them to determine that it is clean, that all moving parts operate freely, and that the tool is free from obstructions and has the proper shield, guard, and attachments recommended by the manufacturer.

Tools should be inspected before and after usage by employees for signs of defects or misuse, and replaced as needed. Cords and pplugs must be inspected before and after usage and any damage or defect notified to your supervisor. Such items must be tagged, taken out of service, and propely repaired or replaced.

If a powder-actuated tool misfires or otherwise fails to operate, employees must immediately discontinue use, disconnect from the power source, tag as "do not use" and contact your supervisor for further instructions.

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21. ELECTRICAL SAFETY

Purpose

The purpose of this Policy is to help identify and avoid the major hazards associated with electricity such as are electrical shock and fire. While the Company has conducted a risk assessment and determined that employees are unlikely to encounter a greater than normal expose to electrical hazards, this Policy is nonetheless designed to mitigate against those unlikely risks.

Scope

Only qualified workers who have been trained in the avoidance of electrical hazards are permitted to work on or near exposed energized parts. Safety related work practices are employed to prevent electric shock or other injuries resulting from either direct or indirect electrical contact when work is performed near or on equipment or circuits which are or may be energized. The specific safety-related work practices must be consistent with the nature and extent of the associated electrical hazards.

Qualified Personnel vs. Unqualified Personnel

For the purposes of electrical safety related work practices, there are two types of employees in the work place that may come in contact with electrical equipment on a jobsite: qualified and unqualified. A Qualified employee is defined as a worker who

- Has been trained to avoid electrical hazards when working on or near exposed energized parts.
- Is familiar with the safety related work practices as required by OSHA standards.
- Is able to distinguish exposed live parts of electrical equipment.
- Is knowledgeable of the skills and techniques used to determine the nominal voltages of exposed parts and components.

An Unqualified employee is defined as a worker who has little or no training regarding electrical hazards. Because the scope of work for MMI employees does not involve dealing with electrical hazards, all MMI employees are NOT consider qualified personnel unless specifically trained and authorized in writing. Even though unqualified persons should not be exposed to energized parts, they are provided the information in this Policy to help perform their job in a safe manner and understand the following:

- Be familiar with any electrical hazards in the workplace.
- Understand procedures to protect themselves when they work around electricity.
- Understand which tasks that can only be performed by qualified workers (e.g. maintenance and repairs).
- Know when and how to report electrical problems.
- Know what to do in the event of emergency involving electricity.
- Know how to inspect electrical tools and equipment before use to make sure insulation and wiring are in good condition.

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Live parts to which an employee may be exposed must be deenergized before the employee works on or near them unless deenergizing the parts introduces additional or increased hazards or is unfeasible due to equipment design or operational limitations. Examples of increased or additional hazards include interruption of emergency alarm systems, shutdown of hazardous location ventilation equipment, or removal of illumination for an area. Live parts that operate at less than 50 volts to ground need not be deenergized if there are no increased exposures to electrical burns or to explosions due to electric arcs. Live parts to which an employee may be exposed must be deenergized before the employee works on or near them unless deenergizing the parts introduces additional or increased hazards or is unfeasible due to equipment design or operational limitations.

Deenergized Parts

When employees work near deenergized parts that would expose them to any electrical hazard they present, the following safety related work practices must be followed:

- Treat as energized any conductors and parts of electrical equipment that have been de-energized but have not been properly locked out or tagged.
- While any employee is exposed to contact with parts of fixed electric equipment or circuits which have been deenergized, the circuits energizing the parts shall be locked out or tagged or both. In addition, electrical hazards must be controlled; a qualified person must test the circuit to verify de-energization from all voltage sources.
- Safe procedures for deenergizing circuits and equipment must be determined before circuits or
 equipment are deenergized. All electric energy sources must be disconnected. Control circuit devices,
 such as push buttons, electric switches, and interlocks must not be used as the sole means of
 deenergizing circuits or equipment. Interlocks must not be used as a substitute for lockout and tagging
 procedures.

Energized Parts

Employees are considered exposed energized parts when working on or near exposed live parts either by direct contact or contact be means of tools or materials or when working near enough to energized parts to be exposed to any hazard they present. Only qualified persons are permitted to work on electric circuit parts or equipment that have not been deenergized (lockout/tag out). Qualified persons are capable of working safely on energized circuits and are familiar with the proper use of special precautionary techniques, personal protective equipment, insulating and shielding materials, and insulated tools.

Overhead Lines

When work is to be performed near overhead lines, the lines must be deenergized and grounded, or other protective measures taken before the work is started. Such protective measures, such as guarding, isolating or insulating, shall prevent the qualified person performing the work from contacting the lines with any part of their body or indirectly through conductive material, tools, or equipment.

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Unqualified persons working in an elevated location near overhead lines are not allowed to come closer or to handle the conductive objects which may contact or come closer to any unguarded, energized overhead line.

Unqualified persons working on the ground in the vicinity of overhead lines are not allowed to bring a conductive object or any insulated object which does not have the proper insulating rating closer to unguarded, energized overhead lines that the distance specified above.

Qualified persons working in the vicinity of overhead lines, whether in an elevated position or on the ground, are not allowed to approach or take any conductive object without an approved insulating handle and is insulated from all conductive objects from the energized part.

Use of Protective Equipment

Employees working in areas where there are potential electrical hazards must be provided with and use electrical protective equipment appropriate for the parts of the body to be protected and the work performed. Protective equipment must be maintained in a safe, reliable condition and be periodically inspected or tested as required by 29 CFR 1910.137, Electrical Protective Devices. Where the insulating capability of protective equipment is subject to damage during use, the insulating material must be protected by covering with leather or other appropriate materials. Nonconductive head protection must be worn wherever there is danger of head injury from electrical shock or burns due to contact with exposed energized parts. Protective equipment for the eyes must be worn where there is danger of eye and/or face injury from electric arcs and flashes or flying objects resulting from electrical.

General Protective Equipment and Tools

Insulated tools and handling equipment must be used by employees working near exposed energized conductors or circuit parts if the tools and/or equipment may make contact with the conductors or parts. The insulating material of tools and equipment must be protected where it is subject to damage. Protective shields, protective barriers, or insulating material must be used to protect employees from shock, burns, or other electrical related injuries while employees are working near exposed energized parts which might be contacted or where dangerous electric heating or arcing might occur. When normal enclosed live parts are exposed for maintenance or repair, the parts must be guarded to protect unqualified persons from contact with the live parts.

Alerting Techniques

Alerting techniques must be used to warn and protect employees from electrical shock hazards, burns, or failure of electric equipment parts. Safety signs, safety symbols, or accident prevention tags must be used where necessary to warn employees about electrical hazards which may endanger them. Barricades should be used in conjunction with safety signs where necessary to prevent or limit employee access to work areas exposing employees to un-insulated energized conductors or circuit parts. Conductive barricades must not be used where they might cause an electrical contact hazard. An attendant should be stationed to warn and protect employees where signs and barricades do not provide sufficient warning and protection.

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Working Outdoors

Electrical hazards on construction or renovation sites or work performed outdoors must be controlled through the use of Ground Fault Circuit Interrupters (GFCIs).

- All 120-volt, single-phase, 15 or 20 ampere receptacles that are not part of permanent wiring must be protected by GFCIs. (Receptacles on smaller generators are exempt under certain situations. Consult with your supervisor or EHS with any questions.).
- Light bulbs used for general illumination must be protected from breakage.
- Temporary lights must not be suspended by their cords, unless so designed.
- Portable lights or tools used in wet or conductive locations must be protected by GFCIs or operate at 12 volts or less.

•

Extension Cords

- Workers must visually inspect extension cords and cord and plug connected equipment daily before
 use. Damaged extension cords must be removed from service and destroyed. Damaged or defective
 equipment must be removed from service and destroyed or repaired by a qualified electrician.
- Extension cords must be three-wire type. Extension cords or flexible cords used for lighting must be designed for hard or extra hard usage (e.g., types S, ST, SO).
- Flexible cords must be connected to devices and fittings so that strain relief is provided and prevents pull from being directly transmitted

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22. ILLUMINATION

PURPOSE

To ensure Company compliance with regulatory and industry best practice regarding lighting requirements, and that employees are provided adequate lighting.

SCOPE

This Program applies to all Company owned and operated work areas.

DEFINITIONS

Foot- candle (FC)— amount of illumination produced by a candle from distance of one foot.

Lux Level – measures light level intensity. One lux is the amount of illumination supplied by one candle on a one-meter surface from a distance of one meter.

LIGHTING REQUIREMENTS

The minimum illumination standards in company facilities are as follows:

- First-aid and eyewash stations: 30 FC
- Warehouses, walkways, and exits: 10 FC
- Underground shafts and tunnels: 5 FC
- Waste areas, loading platforms, refueling areas, and active storage areas: 3 FC

The typical lux levels required in commercial installations are as follows:

- Offices, laboratories, and show rooms: 500 lux
- Factories and workshops: 750 lux
- Warehouse loading bays: 300–400 lux
- Lobbies, corridors, and stairwells: 200 lux
- Warehouse aisles: 100–200 lux

Installation Requirements

All lighting must:

- Be at least 7 feet above work surfaces or have a shatterproof shield
- Not have any exposed energized parts
- Not have an opening large enough that finger can fit through
- Be firmly mounted to a wall, ceiling, or structural member

Temporary Lighting

As part of the hazard assessment process for night work, the Company will consider the hazards of insufficient lighting and determine if applicable work areas meet the above requirements.

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23. DISCIPLINARY POLICY

PURPOSE & SCOPE

The Company takes safety very seriously. Therefore, non-compliance with our safety Policies or those of our Customer will result in disciplinary action. This Policy outlines the Company's discipline policy and procedure in the event of non-compliance with the Policies contained in this Manual or other violations of applicable requirements. The Company has no progressive discipline and reserves the right to take whatever action is determined to be appropriate depending on the facts of each situation and the nature of the non-compliance.

PROCEDURES

Some of the disciplinary procedures that may be taken include the following (without limitation, requirement, or in any particular order):

<u>Counseling and verbal warning</u> - an opportunity for the supervisor to meet with the employee to bring attention to the existing performance, conduct, or other issue. The discussion may include the nature of the problem or Policy violation and the expectations and steps the employee must take to correct performance.

<u>Written warning</u> - written warning involves more formal documentation of the performance, conduct, or other issues and consequences. The supervisor may outline and document the employee's failure to meet performance or expectations, and may include a timeline to implement required corrective actions.

<u>Suspension</u> – if the supervisor determines the performance, conduct, or safety incidents or non-compliance is sufficiently problematic or potentially harmful, the supervisor may suspend the employee pending further information, investigation, or discussion with management.

<u>Termination of employment</u> – the Company reserve the right to terminate any employee at will. Employees may be terminated for any reason, particularly if the supervisor or Company determines that non-compliance with these Policies exists. Company reserves the right to combine steps, skip steps, or take any other action depending on the circumstances of each situation and the nature of the offense. Furthermore, employees may be terminated at any time without liability, prior notice, or disciplinary action.

Nothing in this Policy provides any contract or equitable rights regarding discipline or employment, nor does anything herein modify or alter the at-will employment relationship between Company and its employees.

IMPORTANT NOTE: In the event of workplace injury, MMI offers return-to-work opportunities to applicable injured employees in accordance with and subject to work restrictions identified by health care providers. The Policies herein are for guidance only, are not exclusive or contractual, and should not be relied upon for medical or legal purposes. There is no assurance, expressed or implied, that our Customer's workplace is safe or healthful or that it complies with all laws, regulations, or standards. This Manual is not a contract, is not binding on the Company, and may be changed at any time by MMI without notice.

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APPENDIX A

JOB ORIENTATION GUIDE / MANAGER SAFETY REVIEW CHECKLIST

	Company: <u>McGinley Maintenance Inc.</u>	Employee: Position:	
	Location:	Position:	Employee Review
1.	Explain the company safety program, including:		Linployee Neview
	Job Orientation – SAFETY FIRST	I	
	Potential hazards and risk avoid.		
	Safety meetings and manageme		
	Reward and recognition for safe	• •	
	Disciplinary action for safety vio		
2.	Use and care of personal protective equipment:	1410113	
	Glasses, gloves, safety shoes, of the shoes of the s	etc	
3.	Communication and responsibility for immediate		
٥.	When to report an injury	ry reporting merdenes.	
	How to report an injury		
	 To whom to report an injury. 		
4.	General overview of operation, procedures, met	hods and hazards relating	
	to the specific job, including:	and mazards relating	
	SDS and proper use and handling	g of chemicals	
	 Customer-specific hazards and s 	_	
5.	Emergency plan:	arety procedures	
٠.	Exit location and evacuation rou	tes	
	Location of First Aid		
	Specific procedures (medical, ch	emical etc.)	
8.	Vehicle safety – as applicable.	cimedi, etc.)	
9.	Personal work and safety habits:		
	Safety is the First Job – before all	ll others	
	Importance of Paying Attention		
	 Drug, alcohol, smoking, sickness 		
	 Good housekeeping practices 	, and other policies	
	 Proper lifting Techniques 		
	Slip and Fall Avoidance		
	- Silp and Fail Avoidance		
10.	Stop Work Authority – Confirm employee's right and	d responsibility to stop work	
		retaliation	

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APPENDIX B

Supervisor Checklist for Isolated Employees / Employees Working Alone

This checklist is intended to help supervisors with safety considerations for employees working alone or in isolation away from other workers.

Yes	No	N/A	EMPLOYEE TRAINING
105	110	11/11	Are employees trained and competent to work alone safely?
			Are employees informed of the hazards associated with working in isolation?
			Are employees trained in the proper use of security systems to prevent /
			discourage intruders?
			Are employees trained in regarding strangers seeking entry to the work site?
Yes	No	N/A	SITE WORK PROCEDURE
			Is there a work procedure to secure the work site?
			Does the work procedure include appropriate actions when confronted with an intruder?
			Does the work procedure have a process to check the security of the work site prior to the start and at the end of the shift?
			Is the employee aware of all facility exits?
Yes	No	N/A	SITE SECURITY
			Does the site have a security system?
			Does the security system include the following:
			Remote alarm?
			Personal alarm?
			Video surveillance camera?
			Others? Specify:
			Is the alarm system regularly checked for correct operation?
			Are all doors and windows secured with appropriate locks?
			Is public access to the work site limited?
			Are there adequate lights at the site entrance and parking areas?
Yes	No	N/A	COMMUNICATION
			Does the method of communication involve the following:
			Regular telephone, cell phone, or radio contact with a designated person?
			Regular security patrol?
			Alarm system to security services?
			Regular visit by co-employees
			Others? Specify:
			Does the employee carry a cellphone for emergency use?

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APPENDIX C

SUBCONTRACTOR QUESTIONNAIRE

The contents of this questionnaire will be used by McGinley Maintenance Inc. to assess your company's qualifications to provide the requested contract services. Please return this completed form to:

McGinley Maintenance Inc.
Email – service@mcginleymaintenace.com
Fax No.: 724-483-5569

GENERAL INFORMATION. Plea	ase fill in the following:			
Name of Business:				
Street Address:				
Post Office Address:				
City, State, Zip Code:				
Telephone Number	Fax Number:			
Person to Contact:				
ORGANIZATION . Please indication This firm is a: () C Corporation	,		etor () Limited Li	iability Company
Federal Employer Identification	n Number:			
Senior Management - Name -	Title - Age - Time in Posit	ion		
	l.		I	
	I		I	

WORK EXPERIENCE

List the geographic areas you prefer to work in:

Attach a list of the major projects your firm <u>currently has in progress</u> showing the project name, location, owner, general contractor, contract amount, percent complete and scheduled completion date, and contact person.

Attach a list of the major projects your firm has <u>completed in the last three years</u> showing the project name, location, owner, general contractor, contract amount and completion date, and contact person.

McGinley	
Maintenance,	Inc.

Date: _____

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FINANCIAL INFORMATION
Please attach your firm's most current financial statements (audited, if available), for the entity that will signing the subcontract.
Credit References Name Contact Person Telephone
CONTRACTOR PROFILE
Current Number of employees: Office Field
Does your firm operate as a Union shop? () Yes () No
SAFETY, HEALTH AND ENVIRONMENTAL
Please list your firm's Employees Compensation Interstate Experience Modification Rate.
Does your company have a written safety program? () Yes () No . If yes, provide a copy.
INSURANCE
Attach the certificate of insurance to be provided by your insurance carrier.
ADDITIONAL INFORMATION
Please list additional information you feel will help us determine your firm's qualifications and expertise:
This Pre-qualification Questionnaire was completed by:
Name: Title:

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APPENDIX D

STOP WORK AUTHORITY FORM								
Section 1: Stop Work Issu	ance							
Location of operation	Date & Time							
Supervisor	Phone							
Person initiating stop								
work								
Person performing work								
Work operation or condition (include names of individuals performing work)								
Hazard (as stated by perso	on initiating stop work)							
Section 2: Date / Time Inf Supervisor								
Area Manager	Safety Manager Client Safety (If required)							
Area Manager	chefit safety (if required)							
Section 3: Follow-up Action Section 4: Restart Concurrence Section 6: Restart Concurrence S	on (Be specific – what by, who by, when by to correct haz	ard)						
Supervisor Area Manager	Date							
Safety Manager	Date Date							
Safety Manager	Date							

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APPENDIX E

MMI - SUPERVISOR'S SAFETY INCIDENT REPORT ("12 Hour Form")

Instructions:

- 1. Call Senior MMI Management as soon as you learn of the injury or safety incident.
- 2. As soon as possible but within 12 hours of the incident contact the employee and fill out this form.
- 3. Return As soon as possible fax the completed form to 724-483-5569 or email to: service@mcginleymaintenance.com.

EMPLOYEE INVOLVED IN THE INCIDENT:					
Employee Name:	Employee DOB:				
Employee Address:	Employee Hire Date:				
	Employee Work Location:				
Employee Phone #	Hours Worked:				
INCIDENT INFORMATION:					
Date Incident Occurred:	Specific Time Incident Occurred:				
Location of Incident (specific)					
Referred to Med Express or Hospital – fa	cility name, address / Doctor's name:				
Customer Notified? - Name/Date of	Person Notified				
- Notice Provided	d				
- Drug Test Perfo	ormed? - Yes / No – if yes, describe who, when, where:				
DETAILED DESCRIPTION OF INCIDENT:					
WITNESSES/INTERVIEWS CONDUCTED -	- NAMES/CONTACT INFO:				
COMPLETE AND DETUDAL					
COMPLETE AND RETURN (as soon as pos Supervisor Name (print)	ssible – no later than 12 hours after learning of incident):				
Supervisor Signature					
Date of this Report					

This report is based on third party information which has not been verified and may or may not be accurate.

Nothing in this report will prejudice any right, claim or defense of MMI.

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APPENDIX F

ERGONOMIC ASSESSMENT CHECKLIST

Ergonomic Assessment	Date	Activity Assessed				
Checklist						
	EMPLOYEE NAM	E:	SUPERVISOR:			
Risk Rating (circle one)						
PERSON COMPLETING CHECKLIST:						
High Medium Low BLDG/Location CUSTOMER NAME:		CUSTOMER NAME:				
See Notes on bottom of form to obtain the Rating		COSTONER NAME.				
Ergonomic Assessment Checklist						
				Yes	No	
1. Have there been any complaints from this employee concerning ergonomic issues?						
2. Does the employee perform high repetition tasks? (100 reps/hour to 2000 per/day)						
3. Does the employee's routine tasks require repeated heavy lifting? (>25 lbs.) or occasional heavy lifting (>50 lbs.)						
4. Does the employee's require awkward motions outside of a neutral position for an extended						
period of time? (> 1 hour)						
5. Does the employee perform tasks with an awkward head or neck position for an extended period						
of time? (1 to 3 hours)						
6. Does the employee perform tasks that require awkward back angles to be held for extended						
periods of time (2 to 3 hours)? i.e. hunching, bending, or squatting						
7. Does the employee perform tasks with an awkward elbow angle for an extended period of time						
(1 to 3 hours) or with extreme force application?						
8. Does the employee perform tasks with an awkward wrist flexion angle for an extended period of						
time (1 to 3 hours) or with extreme force application?						
9. Does the employee perform tasks with an awkward back/hip flexion angle for an extended period						
of time (1 to 3 hours) or with extreme force application?						
10. Does the employee perform tasks with an extreme reaching distance for an extended period of						
time(1 to 3 hours) or with extreme for	orce application?					
11. Does the employee perform tasks with an odd work station height (either standing or sitting) for						
an extended period of time (1-3 hours) or with extreme force application?						
12. Does the employee perform tasks at an extreme height (high or low) for an extended period of						
time (1 to 3 hours) or with extreme fe						
18. Are there any other areas of concern either from your observations or employee complaints?						