INJURY & ILLNESS PREVENTION PROGRAM (IIPP)



AN **EMPLOYEE OWNED** COMPANY







2921 Stellar Court Corona CA 92883

Blank

Table of Contents

Introduction	4
covered locations	4
Program Review and Revisions	5
POLICY STATEMENT AND ASSIGNMENT	7
OF RESPONSIBILITY	7
SAFETY POLICY STATEMENT	8
RESPONSIBILITY	9
Individuals Not Eligible to Participate in Incentive Program:	26
HAZARD ASSESSMENT & INSPECTIONS	27
HAZARD CORRECTION	29
ACCIDENT/EXPOSURE INVESTIGATION	30
Injury and Illness Reporting and Treatment	29
TRAINING & INSTRUCTION	32
RECORDKEEPING	34
EMPLOYEE ACCESS TO THE IIPP	35

NP Mechanical's mission is to provide our customers with innovative solutions for their building plumbing, HVAC and Fire Protection systems. Our employees provide these innovative solutions and, therefore, are our most valuable resource. Safety is an integral part of ensuring our mission is achieved successfully.

Our safety program has the safety and health of our employees as its core.

Our Goal: An Injury Free Workplace

We believe that with proper training and attention, all accidents can be prevented. Our customers, managers, and employees are each responsible and accountable for providing a safe work environment, while promoting safety as an integral value.

To achieve our safety goals, we develop site specific safety plans, train every employee in safe practices, and meet or exceed all state and federal environmental, health, and safety regulations. Employees are oriented, trained, and counseled on how to perform their jobs safely, efficiently, and effectively.

Rich Hallinan
President, Chief Operating Officer

Cecil Hallinan
President, Chief Executive Officer

COVERED LOCATIONS

The Injury and Illness Prevention Program applies to all employees at the following locations:

Primary Location

Rice Services Inc. DBA: NP Mechanical

9129 Stellar Court, Corona CA 92883

And All Temporary Worksites



Program Review and Revisions

Initially	Implemented Date	
•	Annual Reviews	Conducted Dr.
	Annual Reviews	Conducted By
	Month and Day	<u>Signature of Reviewer</u>
2016		
2017		
2010	Avenuet 20, 2010, et al. 15, 15, 15	
2018	August 20, 2018 – Finished Product	
2019	Review January 2019 Final Distribution	
2020	March 27, 2020 – IIPP Review	
2021	February 05, 2021 - IIPP Annual Review	
2022	June 06, 2022 – IIPP Review	
2023	August 7, 2023 – IIPP Review	
2024	February 2024 – IIPP Review & Update	
2025		

POLICY STATEMENT AND ASSIGNMENT OF RESPONSIBILITY

SAFETY POLICY STATEMENT

It is the policy of Rice Services *NP Mechanical that* injury and illness prevention shall be considered of primary importance in all phases of operations and administration. It is the intention of the company's top management to provide safe and healthy working conditions and to establish and insist upon safe work practices at all times by all employees.

The prevention of injury and illness is an objective affecting all levels of the organization and its activities. It is, therefore, a basic employee's integral part of his or her regular management function. It is equally the duty of each employee to accept and follow established safe work practices and procedures.

Every effort will be made to provide adequate training and personal protective equipment for employees. However, if an employee is ever in doubt about how to do a job safely, it is their duty to ask a qualified person for assistance.

Employees are expected to assist management in injury and illness prevention activities. Unsafe conditions must be reported. Fellow employees that need help should be assisted. Everyone is responsible for the housekeeping duties that pertain to their jobs and to do everything possible to protect themselves and their coworkers at all times.

Any injury that occurs on the job, even a slight cut or strain, must be reported to management as soon as possible. Under no circumstances should an employee leave a shift without reporting an injury that occurred.

When you have an injury or illness everyone loses; you, your family, your fellow workers and the company. Please work safely. It's good for everyone.

Rich Hallinan
Partner / Owner
2/5/2021
Date

RESPONSIBILITY

The Injury and Illness Prevention Program (IIPP) administrator, Jorge Gomez - Safety Manager and alternates, Rich Hallinan - C.O.O. and HR Director - Sidonie Lapointe have the authority and responsibility for implementing the provisions of this program for *NP Mechanical* Inc.

All supervision and lead personnel are responsible for implementing and maintaining the IIPP in their work areas and for answering worker questions about the program. A copy of this IIPP is available on site in the office at each location.

To obtain a copy of this Injury and Illness Prevention Program, the request must be made in writing and submitted to the *Safety Manager* and either mailed or hand delivered to: 9129 Stellar Court, Suite A Corona, CA 92883

Jorge Gomez	CHSO, Safety Manager	951-903-6755 or 951-667-4220 x 317
Rich Hallinan	C.O.O	951-667-4220 x 329
Maria Diaz	SPHR-CA, SHRM-SCP	951-667-4220 x 310

The Responsibilities of this position may include but are not limited to:

Overseeing the implementation of the IIPP of our Company.

To fulfill this responsibility, the <u>Safety and Health Manager</u> and <u>Chief Operations Officer shall</u>:

- 1. Ensure new employees are aware of their responsibilities under the program.
- 2. Issue each employee a copy of the General and Specific Safe Work Practices.
- 3. Ensure all Managers, Supervisors and lead employees are trained on all aspects of the IIPP and all support programs.
- 4. Ensure there is an up-to-date copy of the IIPP at each location.
- 5. Conduct at least an annual review of the IIPP and support programs and making necessary changes.
- 6. Redistribute updates to the program to each location.
- 7. Ensure each component of the IIPP is followed at each location.

- 8. Acquire and distribute all workplace safety posters.
- 9. Work with Loss Prevention Consultant to stay up to date with regulatory changes that may affect this Injury and Illness Prevention or support programs.
- 10. Make changes to company policies, procedures, and training to support effective corrective actions.
- 11. Implement and send notification of any changes in company policies, procedures, or safety training.
- 12. Ensure all Safety and Health bulletin boards are kept up to date with required postings.
- 13. Ensure all new employees are provided with a copy of the Code of Safe Work Practices and the Safe Work Practices are posted on each safety bulletin board.

Ensuring Compliance of the IIPP Components of our Company

To fulfill this responsibility, the <u>Safety Manager</u> shall:

- 1. Obtain and file a copy of all facility and equipment Safety Inspections.
- 2. Follow up on all Corrective Actions Reports from inspections.
- 3. Provide feedback to the Owner on any corrective actions that require financing or outside vendors.
- 4. Update Safety Inspection when new previously unidentified hazards are detected or when operational changes warrant such as new equipment or processes.
- 5. Ensure loss control recommendations are addressed and completed in the required timeframe and results are communicated to the Loss Prevention Consultant.

Communicate any changes or additions of the IIPP to management.

To fulfill this responsibility, the Safety Manager shall:

- 1. Provide the Staff printed copies of all changes.
- 2. Post the changes on the company bulletin board.
- 3. Mail updates to each location.
- 4. Conduct training with all effected Managers and Supervisors.
- 5. Document review or content change date in the Mater IIP Program.

Ensure the safety and accountability of employees in an emergency.

To fulfill this responsibility, the Safety Manager, HR Manager, C.O.O. shall:

- 1. Ensure all new employees are made aware of the location of fire extinguishers and first aid kits.
- 2. Ensure all employees are trained and understand where the emergency meeting point is for each location and with whom to check in with to ensure everyone is accountable.
- 3. Ensure all employees know the specific procedures to follow in the case of both life threatening and nonlife threatening emergencies.
- 4. Following up with Managers to ensure corrective actions have been taken and are effective in the event an emergency has impacted the work environment.
- 5. Ensure that awareness is raised with all employees when an injury occurs to reduce the likelihood of repeat injuries of the same nature.
- 6. Conduct Hazard Analysis to ensure known and unknown hazards are identified for all employees.
- 7. Ensure emergency phone numbers and nearest medical providers are posted and kept current.
- 8. Ensure all employees know how to respond to and report an emergency and are always provided with the necessary means of contact.
- 9. Ensure all staff given authority to report a serious injury to Cal/OSHA have been trained to do so within 8 hours of knowing an injury has occurred and fills out the required form to document the call has been made.
- 10. Conduct Accident Investigation and ensure corrective actions are completed.

Lower the company's injury rate through effective use of all safety programs and Return to Work.

To fulfill this responsibility, the <u>HR Manager</u>, C.O.O. shall:

- 1. Ensure a clinic or medical provider within the MPN is established and maps and contact information are provided for each location.
- 2. Set up protocols with each clinic to ensure the company is notified either in writing, telephonically or electronically to communicate information regarding injured worker's treatment plan, restrictions and visit schedule.

- 3. Ensure each clinic is aware of the position's essential functions to ensure unnecessary modified duty is not assigned.
- 4. Ensure each clinic is aware of the company Return to Work program to eliminate unnecessary lost work time.
- 5. Communicate regularly with injured workers and complete communication log.
- 6. Issue written RTW offer to employee and forward the offer to the Claims Adjuster.
- 7. Communicate with Medical provider, Claims Adjuster, and supervisor regarding injured worker, to ensure the interactive process is completed and adjust modified duty position when restrictions lessen.

The alternate trained person to ensure timely claims reporting to the Third-Party Administrator or to Cal/OSHA is Safety Manager and HR Manager

Follow-up on claim-related paperwork when employee injuries occur.

To fulfill this responsibility, the <u>HR Manager</u> shall:

- Communicate regularly with Claims Adjuster to ensure they are aware of any
 information that may affect the claim such as providing work status reports from the
 medical provider, sharing information if employee is suspected of working at another
 company while collecting benefits, notifying the adjuster of employees that agree to
 modified duty but do not report for work (TD payments will not be paid), and of
 employee released to regular duties.
- 2. Monitor employee participating in the return-to-work program.
- 3. Monitor the closure of any open claims.
- 4. Ensure that injured employees receive required counseling or retraining to minimize the possibility of reoccurrence of like injury.
- 5. Ensure that any necessary hazard assessments, ergonomic evaluations or workstation modifications are completed.

Monitor the progress of the employee incentive plan.

To fulfill this responsibility, Management shall:

- 1. Determine what behaviors / achievements to reward and ensure consistency in all locations.
- 2. Promote the program.

- 3. Frequently reinforce safety behaviors.
- 4. Obtain Regular Feedback.
- 5. Evaluate Goal Achievement.

Monitor the implementation/process of the Training Matrix / Lesson Plan.

To fulfill this responsibility the HR Manager, Safety Manager, shall:

- 1. Ensure all locations receive a copy of the supporting safety meetings and employee signin sheet.
- 2. Supplement calendar to ensure training is conducted on all topics that have been identified as a loss driver.
- 3. Ensure locations are provided with resources when employee retraining is required, such as retraining an employee that has not followed safe work practices or as a result of raising awareness of topics that have recently resulted in a workplace injury.
- 4. Ensure any changes in employee orientation or process and procedures are adequately trained on.
- 5. Ensure all regulatory or reoccurring training is conducted on time.
- 6. Ensure leadership development training is scheduled to empower supervisors to fulfill the responsibilities identified in these Injury and Illness Prevention and support programs.

Monitor / Conduct Safety Inspections

To fulfill this responsibility, the Safety Manager, Warehouse managers, Field Superintendents shall:

- 1. Obtain and file a copy of all facility and equipment Safety Inspections.
- 2. Follow up on all Corrective Actions Reports from inspections.
- 3. Provide feedback to Management on any corrective actions that require financing or outside vendors.
- 4. Update Safety Inspection when new previously unidentified hazards are detected or when operational changes warrant such as new equipment or processes.
- 5. Ensure loss control recommendations are addressed and completed in the required timeframe and results are communicated to the Loss Prevention Consultant.

Participate in Safety Committee Meetings

To fulfill this responsibility, the Safety Manager, C.O.O., General Managers, Warehouse Managers, and Field Superintendents shall:

- 1. Ensure all parties are properly represented when assigning:
- Responsibility and selecting committee members.
- 2. Schedule meetings at least quarterly.
- 3. Ensure an Agenda is developed for each meeting and Meeting minutes are posted for affected employees to review. Maintain the records for review by Cal-OSHA.
- 4. Ensure all safety suggestions are collected prior to the meeting. Document all committee recommendations regarding employee safety suggestions.
- 5. Provide reports for meetings to include loss runs, inspections, corrective actions report, etc.
- 6. Review investigations of occupational accidents and causes of incidents resulting in occupational injury, occupational illness, or exposure to hazardous substances and, where appropriate, submits suggestions to management for the prevention of future incidents.
- 7. When determined necessary by the committee, the committee may conduct its own inspection and investigation to assist in remedial solutions.
- 8. The committee meeting records shall be maintained for at least one (1) year.

Hazardous Communication Program Responsibilities

To fulfill this responsibility, the <u>Safety Manager</u> shall:

- 1. Ensure that employees have access to the written hazard communication program. Therefore, ensuring that employees know how to access the document and that there are no barriers to employees' access (e.g., storage in a locked room).
- 2. Maintain the chemical inventory and ensure a product identifier for each chemical known to be present aligns with the Safety Data Sheet (SDS) and label.
- 3. The inventory will be for the entire facility and individual work areas.
- 4. Confirm that the inventory includes all chemicals present (even if the chemicals are stored / not in use).
- 5. Verify and be responsible for labeling on shipped containers.

- 6. Be responsible for workplace labeling and ensure all secondary containers are labeled.
- 7. Ensure the GHS labeling system is used.
- 8. Ensure that if a secondary container is under the exclusive control of the user, it will be completely emptied before the end of the shift or properly labeled.
- 9. At least annually all Safety Data Sheets will be reviewed, and label information updated when necessary. Vendors will be requested to provide updated SDS as they become available.
- 10. Be responsible for obtaining/maintaining the SDSs.
- 11. Will verify that SDSs are always available in the office at each dairy location so employees can always obtain access to the SDSs.
- 12. If the SDS is not received at the time of the first shipment, the Vendor shall be called immediately to request the SDS be faxed or e-mailed to the (Warehouse Manager).
- 13. If it is suspected that the SDS is not appropriate, the (Safety Manager) shall be notified immediately to request a new updated SDS.
- 14. All new SDSs will have the date written in the top left-hand corner to ensure there is a way to determine if the SDS is current. Any data sheet with the word "Material" before the Safety Data Sheet will be investigated to obtain an updated SDS.
- 15. Safety and Human Resources is responsible for conducting all employee Safety training.
 - a. For new employees at the time of their initial assignment and to train employees when a new hazard is introduced into the workplace and to train employees when they are potentially exposed to chemicals used by other employers, multi-employer worksites.
 - b. Conduct training, through the use of safety meetings, PowerPoint presentations, use of the SDS and/or chemical label, and through the contracted services of professional loss control service providers.
 - c. Ensure this employer informs other employers about on-site access to SDSs. All subcontract employees will be verbally notified of the location of SDS and the precautionary measures that need to be taken to avoid exposure.
 - d. Retrain any employee who displays a lack of the necessary knowledge through failure to follow precautionary measures or if a new, previously unrecognized hazard is discovered or in the event of a recent injury or incident to raise awareness.

Lock Out / Tag Out Responsibilities

To fulfill this responsibility, the <u>Safety Manager</u> shall:

- 1. Ensure that employees have access to the written Lock Out / Tag Out program. Therefore, ensuring that employees know how to access the document and that there are no barriers to employees' access (e.g., storage in a locked room).
- 2. Ensure the proper selection, purchase, and availability of necessary Lock Out and / or Tag Out equipment for each location.

Conduct Authorized Employees Training

Employees will be trained to use the Lock and Tag Out Procedures. The training will be conducted by the responsible trained person. Retraining shall be held at least annually. The training will consist of the following:

- 1. Review of General Procedures.
- 2. Review of Specific Procedures for machinery, equipment, and processes.
- 3. Location and use of Specific Procedures.
- 4. Procedures when questions arise.

Conducted Affected Employee Training

- 1. Only trained and authorized Employees will repair, replace, or adjust machinery, equipment, or processes.
- 2. Affected Employees may not remove Locks, locking devices or tags from machinery, equipment, or circuits.
- 3. Purpose and use of the Lock Out procedures.

Conduct Other Employee Training

- 1. Only trained and authorized Employees will repair, replace, or adjust machinery or equipment.
- 2. Other Employees may not remove Locks, locking devices or tags from machinery, equipment, or circuits.

Confined Space Responsibilities

To fulfill this responsibility, the Safety Manager shall:

- 1. Ensure that employees have access to the written Confined Space program. Therefore, ensuring that employees know how to access the document and that there are no barriers to employees' access (e.g., storage in a locked room).
- 2. Ensure all Confined Spaces are properly marked and unauthorized employees are prohibited from entry.
- 3. Ensure all staff involved with confined space exposures have been properly trained.
- 4. Know the hazards associated with confined space entry, and in particular, the hazards associated with the Permit Required Confined Space being entered.
- 5. Know how to use all the required equipment.
- 6. Know the procedures for communication with the attendant.
- 7. Know how to alert the attendant of hazardous or prohibited conditions.
- 8. Know how to exit the space if necessary (that is, self-rescue).
- 9. Ensure that adequate provisions have been made for emergency medical response.

Heat Illness Prevention Responsibilities

To fulfill this responsibility, the Safety Manager, C.O.O., Warehouse Managers and Field Superintendents shall:

- 1. Ensure that employees have access to the written Heat Illness Prevention program. Therefore, ensuring that employees know how to access the document.
- 2. Ensure all new employees or those who have been away from work for two weeks or more are properly acclimated to the hot environment.
- 3. Provide cool, clean potable water always.
- 4. Ensure all employees including Supervisors are trained in Heat Illness Prevention at least annually and daily during high heat of temperatures of 95 degrees or more.
- 5. Ensure all employees are aware of emergency response procedures and that no employee is ever left alone when potentially suffering from heat-related illness.
- 6. Provide shade as requested or required under the Heat Illness Prevention regulation.
- 7. Ensure a 10-minute paid break for every 2 consecutive hours of working outdoors in an environment of 90 degrees or greater.

Employer Responsibilities

Under the OSHA law, employers have a responsibility to provide a safe workplace.

Provide a workplace free from serious recognized hazards and comply with standards, rules and regulations issued under the Occupational Safety & Health Act.

- 1. Examine workplace conditions to make sure they conform to applicable OSHA standards.
- 2. Make sure employees have and use safe tools and equipment and properly maintain this equipment.
- 3. Use posters, labels, or signs to warn employees of potential hazards.
- 4. Establish or update operating procedures and communicate with them so that employees follow safety and health requirements.
- 5. Employers must provide safety training in a language and vocabulary workers can understand.
- 6. Employers with hazardous chemicals in the workplace must develop and implement a written hazard communication program and train employees on the hazards they are exposed to and proper precautions (and a copy of safety data sheets must be readily available).
- 7. Provide medical examinations and training when required by OSHA standards.
- 8. Post, at a prominent location within the workplace, the OSHA poster (or the state-plan equivalent) informing employees of their rights and responsibilities.
- 9. Report to the nearest OSHA office all work-related fatalities within 8 hours, and all work-related inpatient hospitalizations, all amputations, and all losses of an eye.
- 10. Keep records of work-related injuries and illnesses.
- 11. Provide access to employee medical records and exposure records to employees or their authorized representatives.
- 12. Do not discriminate against employees who exercise their rights under the Act.
- 13. Post-OSHA citations at or near the work area involved. Each citation must remain posted until the violation has been corrected, or for three working days, whichever is longer. Post abatement verification documents or tags.

- 14. Correct cited violations by the deadline set in the OSHA citation and submit required abatement verification documentation.
- 15. Provide financial support to ensure all components of a safe work environment are made possible.
- 16. Empower the leaders within the company to enforce and support the programs put in place to ensure a safe and healthy work environment.

Employee Responsibilities

Get involved. If you think a job or a task is unsafe, stop the work. If you see something unsafe, report it. Commit today to take an active role in safety. Don't wait until something happens and an injury takes over your life. You can serve as a good role model to your co-workers for safe work practices and behaviors by:

- 1. Following established health and safety policies and procedures.
- 2. Do not horseplay in the working environment.
- 3. Maintaining your personal work area in a clean and orderly manner.
- 4. Wearing, maintaining, and properly storing your personal protection equipment (PPE).
- 5. Attending all safety training that your employer offers.
- 6. Conduct all required equipment and tool inspections.
- 7. Never use tools or equipment you have not been trained to use properly.
- 8. Using safe work practices to eliminate slips, trips, falls, and other injuries.
- 9. Lift safely and help others to do the same.
- 10. Label all chemical containers and become familiar with safety data sheets.
- 11. Know evacuation procedures and the location of emergency equipment.
- 12. Speak up. Talk to your supervisor if you have any concerns. No one knows your job and tools better than you do. Never operate equipment or machinery unless you've been properly trained. Give suggestions to make a process or equipment safer. Immediately notify your co-workers and supervisor of any damaged equipment, hazardous conditions, or unsafe behavior. Promptly report all injuries, illnesses, and near misses to your supervisor.

Executive Management Structure

Responsible person for overall implementation and maintenance of this Injury and Illness Prevention program

Title: Safety Manager Name: Jorge Gomez

Owners

- •Cecil Hallinan (951) 667-4220
- •Rich Hallinan (951) 667-4220

Operation: Manager

•Ben Walter Ext. (951) 667-4220 EXT307

Managers

- •Saul Lopez (951) 667-4220 Ext. 344
- •Armando Rubio (951) 603-6725
- •Bryan Davis (909) 322-3061

Human Resources and Safety

- •Maria Diaz (951) 667-4220 Ext. 311
- •Jorge L. Gomez (951) 903-6755 and (951)667-4220 Ext 317

Warehouse Mangers

- Ben Walter (951) 603-6565
- •Angel Zavala (951) 746-5481

COMPLIANCE

All workers, including managers and supervisors, are responsible for complying with safe and healthy work practices. Our system of ensuring that all workers comply with these practices include one or more of the following checked practices:

- ✓ Informing workers of the provisions of our IIP Program.
- ✓ Evaluating the safety performance of all workers.
- ✓ Recognizing employees who perform safe and healthy work practices.
- ✓ Providing training to workers whose safety performance is deficient.
- ✓ Disciplining workers for failure to comply with safe and healthy work practices.

We have established the following policy to ensure compliance with our rules on workplace security.

The management of our establishment is committed to ensuring that all safety and health policies and procedures involving workplace security are communicated and understood by all workers.

All workers are responsible for using safe work practices, for following all directives, policies, and procedures, and for assisting in maintaining a safe and secure work environment. Our system of ensuring that all workers, including supervisors and managers, comply with work practices that are designed to make the workplace more secure, and do not engage in threats or physical actions that create a security hazard for others in the workplace, includes:

- 1. Informing all employees of the provisions of our IIP Program for Workplace Security.
- 2. Evaluating the performance of all employees in complying with our establishment's workplace safety and health measures.
- 3. Recognizing employees who perform work practices that promote safety and health in the workplace.
- 4. Providing training and/or counseling to employees whose performance is deficient in complying with work practices designed to ensure workplace Safety and Health.
- 5. Disciplining employees for failure to comply with workplace security practices.

Disciplinary Procedures for Safety Violations

The success of our Injury and Illness Prevention Program is dependent upon the willing participation of its employees. Accident prevention is the key goal of this program. Our Company has established certain safety rules designed to prevent accidents and injuries.

Compliance with these rules is mandatory. Documentation will be made as the rules are distributed to the employees. Penalties for violation of these safety rules will conform to the existing Company's disciplinary procedures. Employees who fail to follow the established safety policies and procedures will be subject to disciplinary actions including suspension or termination. However, employees who committed minor offenses will be disciplined as follows:

First Offense: Verbal Warning

Management will document infractions internally to make sure that a record is taken of each matter. Retraining is likely to occur at the manager's discretion.

Second Offense: Written warning.

Management will document the infraction using appropriate forms and the employee will be asked to sign the notice and the employee's immediate supervisor will also sign the notice.

Retraining would be appropriate in most cases and will be determined at management's discretion.

Third Offense: Suspension

Fourth Offense: Termination

Sample Incentives

We recognize our employees who consistently perform safe and healthful work practices by:

- Keeping a posted record of days worked without injury.
- Informal recognition of safety practice
- Formal recognition of individuals or groups for safety performance
- Material recognition

Other Means

Management is responsible for ensuring that all safety and health policies and procedures are communicated to and understood by all employees. Managers and superintendents are expected to enforce the rules fairly and uniformly. All employees are responsible for using safe work practices, for following all directives, policies, and procedures, and for assisting in maintaining a safe work environment. Our system of ensuring that all workers comply with the rules and maintain a safe work environment include:

- 1. Informing workers of the provisions of our IIP Program.
- 2. Evaluating the safety performance of all workers.

- 3. Recognizing supervisors who perform safe and healthy work practices.
- 4. Providing training to workers whose safety performance is deficient.
- 5. Disciplining workers for failure to comply with safe and healthy work practices.
- 6. Terminating any employee who receives more than two written warnings.

Protection Against Retaliation

NP Mechanical/ Rice Services protects employees against retaliation. We strictly prohibit retaliation against employees who report misconduct, raise a concern, or cooperate in an investigation, provided that the employees have acted in good faith and with a reasonable belief that the information provided is true. Anyone who retaliates will be subject to disciplinary action, up to and including termination of employment. If you believe that you have been the subject of retaliation, contact Human Resources or the Safety Manager.

Violation Notice

Employee Na	me:	Craft / Occupation:
Job Number:		Project Name:
Project Locati	on:	Date:
safety standa employees of	rds. The activity described by others, and or loss of prope	above-named employee of a violation of established work rules or pelow has the potential for serious injury to the employee, co-workers, rty or equipment. Further violation(s) of established work rules or safety action, which can include immediate termination and or removal from the
Nature of Viol	ation or Infraction:	
Action Taken: (Check One)		/arning (Suspension of 0 Days)
Issued By:		Date:
Supervisor's	Signature:	Date:
Manager's Siç	gnature:	Date:
Employee's S	ignature:	Date:
Distribution:	Original to employee Copy to Project Manger Copy to HR Copy to Safety Departme	nt

SAMPLE SAFETY INCENTIVE PROGRAM GUIDELINES-Pending

The Safety Incentive Program encourages employees to get involved in all aspects of workplace health and safety. Employees may participate in 19 safety and wellness categories over the course of a year. Points are awarded for documented participation in one or more of the categories. At the end of the year points are totaled for each employee and a gift card is awarded based upon the number of points earned.

Program Rules

1)	Α	Ш	current	t emp	loyees	are	eligible	to	earn	points.	
----	---	---	---------	-------	--------	-----	----------	----	------	---------	--

- 2) The incentive program points are earned during the calendar year January 1 –December 31.
- 3) Points earned will be credited at \$1 gift card value per point; an employee that accumulates 150 or more points is awarded a \$200 gift card.
- 4) Gift Card maximum value is \$200.
- 5) All activities that earn points must be documented and provided to ______for recordkeeping and tracking purposes.
- a) Training is documented on attendance sheets or with completion certificates.
- b) Committee participation is documented in meeting minutes.
- c) Participation in various safety activities (presenting safety topics, leading meetings, participating in accident investigations, conducting special safety projects, quarterly inspections, pre-tour route inspections, job hazard analyses, safety drills, etc...) will be coordinated with the Safety Committee, documented, and submitted to the Safety Committee once the activity is completed.
- d) Participation in Wellness activities will be documented by the Wellness Committee and a copy submitted to .
- e) Newsletter articles must be submitted to the Safety or Wellness committee for acceptance and then published in the Newsletter.
- f) Hazards Observed and safety suggestions will be submitted to the Safety Committee for review and validation.
- 6) Six Retailers will be randomly selected each year. At least one local retailer from each jurisdiction will be included in the six selected. The Retailers will be selected from the following list:
 - Stater Brothers
 - Costco
 - Target
 - Home Depot
 - Lowe's
 - Wal-Mart

- Starbuck's
- Best Buy
- Fridays
- AMC Theaters
- 7) Employees may choose a Gift Card from one of the 10 selected retailers or a combination of gift cards to reach the incentive award amount. Gift Cards are not redeemable for cash.
- 8) Individual locations, department or teams are eligible for participation in achieving the following:

Certificate of Recognition – Reduced Incident

Individuals Not Eligible to Participate in Incentive Program:

Upper Management

COMMUNICATION

Satisfying the needs of our employees requires frequent communication. The Safety Manager will be communicating safety-related training in several ways. They will also be asking for your input on how to make things better. Here are some of the communication tools we use.

- All managers and supervisors are responsible for communicating with all employees about occupational safety and health in a form readily understandable by all employees. Our communication system encourages all employees to inform their managers and supervisors about workplace hazards without fear of reprisal.
- New hires safety training will be conducted through new employee orientation and ongoing safety training and re-training will be conducted through periodic one-on-one training conducted by a qualified staff member.
- The Supervisors and Managers will conduct weekly meetings addressing topics including safetyrelated matters, including possible injuries that could occur to order help prevent them from happening.

Effective communications with employees have been established using the following methods:

Review of our IIPP	Employee Safety Training
Safety newsletter, handouts	Safety training programs
Employee safety recognition	Ongoing scheduled safety meetings
Safety data sheets	New Employee Orientation

Posters and warning labels	Staff meetings quarterly
Posted or distributed safety information on bulletin boards	Tailgate meetings weekly
Specific policies/procedures	Department hazard assessment

Employees are encouraged to report any potential health and safety hazard that may exist in the workplace to the General Superintendent or Owner.

HAZARD ASSESSMENT & INSPECTIONS

Periodic inspections will be conducted to evaluate physical hazards, use of hazardous materials, and safe work practices. The periodic inspection schedule and the responsibility for conducting the inspections are included in the *NP Mechanicals* IIPP supplements.

In addition, at the Company, periodic inspection and/or Job Hazard Analysis will be conducted as required in the following situations:

- 1. When we initially established our IIPP.
- 2. When new substances, processes, procedures, or equipment that present potential new hazards are introduced into our workplace.
- 3. When required by the General Contractor and/or Builder.
- 4. When new, previously unidentified hazards are recognized.
- 5. When occupational injuries and illnesses occur; and
- 6. Whenever workplace conditions warrant an inspection and/or JHA.

Program Audits are conducted to check the administration of specific safety and health programs.

Program Audits of the following shall be conducted annually:

- 1. Injury and Illness Prevention Program
- 2. Accident Prevention Support Programs
- 3. Fire Prevention
- 4. Lock Out Tag Out
- 5. Hazard Communication
- 6. Personal Protective Equipment Hazard Assessments
- 7. Code of Safe Work Practices
- 8. Job and Activity Hazard Analysis

Loss Prevention Specialists will study past accidents and worker compensation complaints, by focusing on past injuries. If hazards occur or recur, this reflects a breakdown in the hazard control system. The hazard control system is also the basis for developing safe work procedures and injury/illness prevention training.

Employees will be encouraged to notify their supervisors of possibly hazardous situations, knowing their reports will be given prompt and serious attention without fear of reprisal. When we let them know that

the situation was corrected (or why it was not hazardous), we create a system by which our employees continue to report hazards promptly and effectively.

We will prevent many hazards from occurring through scheduled and documented self-inspections. To make sure established safe work practices are being followed and those unsafe conditions or procedures are identified and corrected properly we will conduct scheduled inspections in addition to the everyday safety and health checks that are part of the routine duties of managers and supervisors.

Job Hazard Analysis (JHA)

The Job Hazard Analysis (JHA) is a method of looking at an upcoming event or task and then breaking it down into smaller portions. Each portion is then analyzed for risk and a plan is developed to minimize the risk. A good supervisor already does this mentally; however, this is now put on paper.

The following tasks shall require a JHA to be completed 3 days before construction work and submitted to the Safety Department for review:

- Excavations greater than 5 Feet
- Confined Spaces
- Respirator Work
- Working around Extremely Hazardous Chemicals
- Working within Shafts Involving 3 or More Floors
- Attic Work Involving Fall Protection Issues
- Brazing and Soldering Operations Around Combustibles
- Any Non-routine Tasks not Mentioned Above

The Foreman, Supervisor, or Superintendent in charge of the job is responsible for performing the JHA and reviewing the JHA with all affected parties before the commencement of the work. Everyone who reviews the JHA shall sign it, stating that they understand the JHA and agree to follow it.

HAZARD CORRECTION

NP Mechanical's Corrective Action procedure will include the steps taken to:

- 1. Review and document the problem.
- 2. Contain or temporarily fix the problem. e.g., remove the defective product from production and quarantine it in a designated area for later investigation, any area that poses a hazard that is in the process of being corrected will be secured to access limited to ensure everyone working in the area is aware of the hazard and to limit exposure.
- 3. Investigate the cause of the problem how did it happen? why did it happen? could it happen again?
- 4. Propose an appropriate solution that will prevent the problem from happening again. This will often mean a change to the process.

- 5. Reporting on what actions were taken.
- 6. After an appropriate period, assess whether the actions taken were successful in preventing recurrence. Document the evidence to support your decision.
- 7. Once satisfied the problem is not recurring, the issue will be closed.

The documentation for corrective action provides evidence that the problem was recognized, and corrected, and proper controls installed to make sure that it does not happen again.

Mitigation Escalation Path

When a safety issue is outside of our direct control (e.g., another contractor/general contractor or client issue), it is our responsibility to those we work with to help remedy the situation.

- 1. Contact your direct Supervisor/Foreman at the job site
- 2. The supervisor/Foreman is to contact the General Contractor.
- 3. Contact NP Mechanical's Safety Department & General Foreman
- 4. The Company's Safety Department & General Superintendent to discuss options and mitigation plan together.

NOTE: The safety department can always be contacted by phone - (909) 951-667-4220 or (951) 903-6755

ACCIDENT/EXPOSURE INVESTIGATION

In the unlikely event you are injured, please immediately report to your manager. All injuries, no matter how small, must be reported immediately. You will be directed as to which doctor's office to visit. In some situations, a second opinion may be required. We protect against job-sustained injuries and loss of work through worker's compensation insurance. This protection is paid entirely by the *Company*. All medical, hospital, and surgical expenses for job-sustained injuries are covered under this policy.

If you have or are a carrier of an illness that will affect your fellow employees or our customers, do not report to work. If you think you have or have been exposed to an infectious disease, please call a member of your management team to ask for time off and call your doctor. A doctor's note indicating you are healthy will be required to return to work.

Immediately alert a member of the management team if you spot an illness, accident, or unsafe working conditions in the workplace. Likewise, if you're injured on the job, report it immediately.

Injury and Illness Reporting and Treatment

Employees who are injured or become ill at work must report the injury or illness immediately to their supervisor and (Safety Manager or Human Resources Director). The supervisor must provide employees with authorization to obtain the level of medical attention required for the situation. For non-emergency medical

treatment of work-related injuries or illnesses, Safety or Human Resources will coordinate the nearest Occupational Health Facility closest to where the employee is currently working.

The Safety or Human Resources Department must complete and provide injured employees with *the Company's* Referral for Medical Treatment form to take them to the treatment facility. If the injury is more than first aid treatment, also provide the employee with a "Workers' Compensation Claims Form (DWC-1)

Serious Injuries

Serious occupational injuries, illnesses, or exposures to hazardous substances, as defined by Cal/OSHA, must be reported to *Employee Name* or *Employee Name* immediately when they become known to managers or supervisors. Serious injuries include deaths, amputations, concussions, crush injuries, fractures, burns, lacerations with significant bleeding or requiring stitches, or hospitalization (other than for observation) for greater than 24 hours.

Supervisors must report injuries that meet the Cal/OSHA definition of Serious Injury to the OSHA Enforcement Hotline at 1-800-321-6742 as soon as they are notified of the injury. Required information.

includes the name of the injured employee, a summary of the incident, a description of the injuries obtained by the employee, and a number where the reporting supervisor can be reached. Safety Manager must report the injury to Cal-OSHA within eight (8) hours of occurrence. The company is responsible for payment of up to a \$5000 fine for late reporting. Supervisors will conduct an incident investigation in conjunction with a representative from the injured employee's department to determine any contributing conditions and develop corrective action plans.

Accident, Injury, and Illness Investigations

The employee's Supervisor and Safety Manager are responsible for performing an investigation to determine and correct the cause(s) of the incident. Specific procedures that can be used to investigate workplace incidents and hazardous substance exposures include:

- 1. Secure the scene and any involved equipment.
- 2. Provide necessary care and call 911 for any injured workers.
- 3. Interviewing injured personnel and witnesses.
- 4. Take photos of the scene and surrounding area. Take 360-degree photos of the scene and any involved equipment.
- 5. Examining the injured employee's work area for causative factors.
- 6. Review established procedures to ensure they are adequate and were followed.
- 7. Reviewing training records of affected employees; retrain employees to raise awareness of the incident and to ensure no further incidents occur.

- 8. Determining all contributing causes to the incident.
- 9. Taking corrective actions to prevent the incident/exposure from reoccurring.
- 10. Recording all findings and actions taken.

The supervisor's findings and corrective actions must be documented using the Incident Investigation Form or equivalent form. If the supervisor is unable to determine the cause(s) and implement appropriate corrective actions, assistance is available from the Operations Manager or Safety Manager.

The Safety Manager must review the investigation report to ensure that the investigation was thorough and that all corrective actions are completed. Investigations and/or corrective actions that are found to be incomplete should be routed back to the supervisor for further follow-up. All corrective actions that are not implemented in a reasonable period must be discussed with the Rich and Cecil Hallinan owners.

TRAINING AND INSTRUCTION

It is the goal of *The Company* to develop the highest level of skill among all employees. Therefore, a common training program has been established to develop staff and to meet the training needs of the company.

Jorge Gomez, Safety Manager is responsible for implementing and directing the training program throughout the company.

This training will include, but not be limited to:

- 1. Explanation of our IIPP, including Heat and Illness Training
- 2. Emergency Action plan and Fire Prevention plan.
- 3. Reporting on any unsafe conditions, safe work practices, injuries and when additional instruction is needed.
- 4. Use of appropriate clothing, including gloves, footwear, and personal protective equipment.
- 5. Information about chemical hazards which employees may come in contact with.
- 6. Availability of toilet, handwashing and drinking water facilities.
- 7. Machine guarding and safe use, cleaning and maintenance procedures.
- 8. Training and retraining of common hazards within the workplace.

9. Provisions for medical services and first aid, including emergency procedures.

What to do if emergencies occur in the workplace.

We will ensure all supervisors know:

- 1. They are key figures responsible for the establishment and success of your Injury and Illness Prevention Program.
- 2. The importance of establishing and maintaining safe and healthy working conditions.
- 3. They are responsible for being familiar with safety and health hazards to which their employees are exposed, how to recognize them, the potential effects these hazards have on the employees, and rules, procedures, and work practices for controlling exposure to those hazards.
- 4. How to convey this information to employees by setting good examples, instructing them, making sure they fully understand and follow safe procedures.
- 5. How to investigate accidents and take corrective and preventive action.
- 6. No employee is expected to undertake a job until he/she has received instructions on how to do it properly and safely and is authorized to perform the job.
- 7. No employees should undertake a job that appears to be unsafe.
- 8. No employee should use chemicals without fully understanding their toxic properties and without the knowledge required to work with them safely.
- 9. Mechanical safeguards must always be in place and kept in place.
- 10. Employees are to report to a superior or designated individual all unsafe conditions encountered during work.
- 11. Any work-related injury or illness suffered, however slight, must be reported to management at once.
- 12. Personal protective equipment must be used when and where required, and properly maintained.

The Hazardous Communication Training Program will consist of:

- (a) How the hazard communication program is implemented, how to read and interpret information on labels and SDS to include understanding pictograms, and how employees can obtain and use the available hazard information.
- (b) The hazards of the chemicals in the work area.

- (c) Measures employees can take to protect themselves from the hazards.
- (d) Specific procedures put into effect by the company to provide protection, such as personal protective equipment.
- (e) Methods and observations, such as visual appearance or smell, workers can use to detect the presence of a hazardous chemical they may be exposed to.
- (f) How to respond in the event of a chemical spill.
- (g) How to request an SDS and where SDSs are located.
- (h) The requirements of the hazard communication regulation, including the employees' rights under the regulation.
- (i) The location and availability of the written hazard communication program
- (j) Any operation in their work area, including non-routine tasks, where hazardous substances or Proposition 65 carcinogens/reproductive toxins are present, and exposures are likely to occur.

RECORDKEEPING

Records will be kept of all safety program activities, and may include:

- 1. Initial orientation training- maintained during the course of employment.
- 2. Job descriptions and/or job analysis maintained during the course of employment or until replacement descriptions or analysis are conducted.
- 3. Safety meetings- maintained during the course of employment.
- 4. Training schedule for each employee- maintained during the course of employment-1 year.
- 5. Injury or illness investigation for at least three years.
- 6. Employee and employer claim form for at least three years or the claim is closed.
- 7. Cal/OSHA required records [Form 300, medical exposure records, injury reports (Form 301)] on file in a centralized office for <u>five years</u>. The 300 log must be maintained current within five (5) days of experiencing or receiving notification of a recordable incident.
- 8. Inspections performed, in-house, and any performed by outside agencies not less than three years.
- 9. Disciplinary actions maintained during the course of employment.
- 10. Vehicle Inspection forms not less than three years.

- 11. DMV driving records not less than three years.
- 12. CPR/First Aid training maintained during the course of employment.
- 13. Employee exposure records must be retained for 30 years plus the length of employment.

At least one copy of all the above records will be maintained and filed by The Program Administrator at the main office located at *NP Mechanical Inc.* 9129 Stellar Ct, Corona CA.

In conclusion, *the Company* values the safety of all company employees, and it is our intent to maintain the high standards of safety that will ensure the good health and well-being of all those we employ.

EMPLOYEE ACCESS TO THE IIPP

Our employees—or their designated representatives—have the right to examine and receive a copy of our IIPP. This will be accomplished by:

- 1. Provide access in a reasonable time, place, and manner, but in no event later than five (5) business days after the access request is received from an employee or designated representative.
 - a. Whenever an employee or designated representative requests a copy of the Program, we will provide the requester with a printed copy of the Program, unless the employee or designated representative agrees to receive an electronic copy of the Program.
 - b. One printed copy of the Program will be provided free of charge. If the employee or designated representative requests additional copies of the Program within one (1) year of the previous request and the Program has not been updated with new information since the prior copy was provided, we may charge reasonable, non-discriminatory reproduction costs for the additional copies.
- Provide unobstructed access through a company server or website, which allows an employee to review, print, and email the current version of the Program. Unobstructed access means that the employee, as part of their regular work duties, predictably and routinely uses electronic means to communicate with management or coworkers.
 - a. Hard hats with QR Code Stickers will be issued to ALL field employees giving them electronic access to the IIPP in both Spanish and English.
 - b. Instructions on how to use the QR Code sticker will be provided during New Hire Safety Orientation sessions including employee rights to access the program.
 - c. Periodic Tailgate Safety Meetings will be conducted to remind employees how to access IIPP electronically using the QR Code.