

INJURY & ILLNESS PREVENTION PROGRAM

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1.0 COMPANY POLICY, RESPONSIBILITIES, & REVIEW

1.1 Company Policy. The management of this company is committed to a safety and health program that will include:

- * Conducting a program of safety and health inspections to find and eliminate unsafe working conditions or practices, to control health hazards, and to comply fully with the safety and health standards for every job.
- * Providing mechanical and physical safeguards to the maximum extent possible.
- * Training all employees in good safety and health practices.
- * Developing and enforcing safety and health rules, and requiring that employees cooperate with these rules as a condition of employment.
- * Providing necessary personal protective equipment, and instructions for use and care.
- * Providing a system of communication designed to facilitate open, two-way communication between management and employees on health and safety issues.
- * Investigating, promptly and thoroughly, every accident to find out what caused it and correct the problem so it won't happen again.
- * Providing a workplace that is free from acts of violence or threats of violence.

1.2 Scope of Program. It is the policy of the company to fully comply with the California Labor Code, Section 6401.7 (SB 198) and General Industry Safety Order 3203, Injury and Illness Prevention Program. The Injury and Illness Prevention Program shall include, but not be limited to the following elements:

- 3203(a)(1) Identification of the person or persons with the authority and responsibility for implementing the Program.
- 3203(a)(2) An effective system for ensuring that employees comply with safe and healthy work practices.
- 3203(a)(3) A system for communicating with employees in a form readily understandable by all affected employees on matters relating to occupational safety and health, including provisions designed to encourage employees to inform the employer of hazards at the worksite without fear of reprisal.

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- 3203(a)(4) Procedures for identifying and evaluating work place hazards including scheduled periodic inspections to identify unsafe conditions and work practices. Inspections shall be made to identify and evaluate hazards.
- 3203(a)(5) Procedures for investigating occupational injury or occupational illness.
- 3203(a)(6) Procedures for correcting unsafe or unhealthy conditions, work practices and work procedures in a timely manner based on the severity of the hazard.
- 3203(a)(7) Provide training and instruction.
- 3203 (a)(8) Employee Access to the Program. Access means the right and opportunity to examine and receive a copy of the IIPP.
- 3203(b) Records of the steps taken to implement and maintain this program.

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1.3 Assignment of Responsibility for Injury and Illness Prevention

The company has the primary responsibility for the safety and health of employees. The safety and health organizational structure is such that safety and health is an operating management responsibility. Individual management and employee responsibilities are as follows:

1.3.1 General Manager. Be committed to implement the company Injury and Illness Prevention Program by providing his authority, budget and resources to enable the company's safety and health policies and procedures to be effectively implemented.

1.3.2 Department Manager -- Implement, in his own area of responsibility, the requirements of the company Injury and Illness Prevention Program. The Department Manager is responsible for the following:

1. Review safety reports/inspections, accidents and near miss incidents and safety meetings.
2. Inform Safety Coordinator of new processes, methods, equipment or material changes.

1.3.3 Supervisor -- Be committed to implementing the company Injury and Illness Prevention Program in his/her own operations. The Supervisor is responsible for developing proper attitude towards safety and health in themselves and in those they supervise, and for ensuring that all operations are performed with the utmost regard for the safety and health of all personnel involved, including themselves. The Supervisor is responsible for the following:

1. Investigation of accidents and near miss incidents.
2. Conducting safety meetings with employees.
3. Provide safety orientation for all new hires or transferring employees.
4. Training employees in safe work procedures.
5. Inspecting departments for hazards.
6. Hazard evaluation, identification and correction.
7. Setting a good example.
8. Ensuring that employees under their direction:
9. Are able to and understand how to complete each assigned task safely.
10. Follow safe work practices and health regulations.
11. Wear required protective equipment.
12. Making sure equipment and machines are in safe operating condition.
13. Notify the Safety Coordinator of all reported threats of workplace violence.

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1.3.4 Safety Coordinator -- Provide assistance to operating management in the following areas:

1. Participate in Safety Meetings.
2. Maintaining logs and records.
3. Planing, organizing and coordinating training.
4. Regulatory requirements.
5. Documentation of Injury and Illness Prevention Program.
6. Communication with employees on safety and health matters.
7. Review of accidents and near miss incidents.
8. Follow-up on employee Safety Suggestions.
9. Conduct a complete assessment of all reported threats of workplace violence.

1.3.5 Individual Company Employees. Individual company employees are responsible for wholehearted, genuine operation of all aspects of the safety and health program -- including compliance with all rules and regulations - - and for continuously practicing safety while performing their duties. They have the following responsibilities:

1. Report all unsafe conditions encountered in the workplace.
2. Report all industrial injuries or illness suffered as an employee, even a slight one and all near miss incidents.
3. Shall not remove, displace, damage, destroy or carry off any safety device, safeguard, notice or warning furnished for use in the company.
4. Shall not interfere with the use of any method or process adopted for the protection of any employee.
5. Shall comply with all Occupational Safety and Health standards, rules, regulations and orders pursuant to the law.
6. Shall know the General Safety Rules and the Code of Safe Practices for their job.
7. Shall report ant threats of violence to their supervisor and/or Safety Coordinator.
8. When aware of an imminent act of violence, a threat of imminent violence or actual violence, emergency assistance must be sought immediately. In such situations, contact your supervisor and/or Safety Coordinator and, if appropriate, contact the law enforcement authorities by dialing 911.

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1.4 Record of Review

DATE	REVISION	COMMENT
7/1/91	N/C	Effective Date.
7/1/92	A	Format changed, content unchanged.
7/1/93	A	No changes required.
7/1/94	B	Program updated to current Cal/OSHA requirements and recommendation.
7/1/95	B	No changes required
7/1/96	C	Section 10.0 added: Workplace Violence.
7/1/97	C	No changes required.
1/1/98	D	Section 11.0 added: Alcohol & Drug Abuse. Periodic Review section added.
1/1/99	D	No changes required.
1/1/00	D	No changes required.
1/1/01	E	Section 12.0 added: Unlawful Harassment
3/21/01	F	Section 13.0 added: Personal Protective Equipment.
1/1/02	G	Injury and Illness reporting and tracking changed to reflect the replacement of OSHA Log 200 to OSHA Log 300 system.
1/3/03	G	Reviewed, no changes required.
1/3/04	G	Reviewed, no changes required.
1/3/05	G	Reviewed, no changes required.
1/4/06	H	Table of Contents Added.
1/4/07	I	Section 14.0 Added: Heat Illness Prevention.
1/07/08	I	Reviewed, no changes made.
1/05/09	I	Reviewed, no changes made.
1/08/10	I	Reviewed, no changes made.
1/03/11	I	Reviewed, no changes made.
1/09/12	I	Reviewed, no changes made.
1/13/13	I	Reviewed, no changes made.
1/15/14	I	Reviewed, no changes made.
1/5/15	I	Reviewed, no changes made.
1/11/16	I	Reviewed, no changes made.
1/30/17	I	Reviewed, no changes made.
1/30/17	J	Revised to add Prop 64 Requirements
7/1/2020	K	Revised to add Section 8 Employee Access

1.5 Periodic Review of the Injury & Illness Prevention Program. Our Company's Injury & Illness Prevention Program will be periodically reviewed and updated to assure that it addresses our current work force and operation as well as any developments that have occurred since the installation of the program. Changes required because of new hazards identified or incorporating a new Cal/OSHA standard that has been adopted will be made as these developments occur. This review will be documented and maintained as part of this program.

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1.6 Handling a Cal/OSHA Inspection. Cal/OSHA’s principle function as a regulatory agency is to enforce compliance with the occupational safety and health standards. Its primary method of doing this is through inspections. Cal/OSHA has the jurisdiction to conduct unannounced inspections of any workplace. If the employer does not consent to an inspection, Cal/OSHA has the authority to obtain a warrant to compel the inspection upon presentation of reasonable cause to the court or magistrate. ***The appropriate tactic is consent and cooperation.*** Any violations found can be appealed. Remember, the inspector is there to help you and is only doing his/her job. Be friendly and have a smile on your face.

1.6.1 Initial Actions. A Cal/OSHA inspector usually arrives unannounced. The inspector will offer to present his or her credentials to an employer representative and request permission or consent to enter the workplace to conduct an inspection.

- Any employee who greets an inspector shall refer the inspector to a key person or the person responsible for the IIPP.

DESIGNATED OR KEY PERSONS TO BE CONTACTED

- If the key or designated person is unavailable, the inspector should be informed that an inspection requires the presence of certain persons and that these persons are not available. The inspector should be asked to wait until a key person is available. Inspectors generally will wait for a reasonable period of time.
- If the key person is present, the inspector will present credentials (which should be reviewed) and commence an opening conference.
- The opening conference will explain the purpose of the inspection. The inspection can have a narrow focus on the complaint or accident, or a wall-to-wall inspection can be triggered. In cases of an employee complaint, Cal/OSHA will not disclose the complaint.
- The inspector will want to see all of your written safety programs, documentation that they are implemented, OSHA Log 300's, environmental testing, etc. The inspector may also want copies to take with him/her. The inspector should give you a check list of what is wanted.

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1.6.2 During the Inspection. Once the inspection begins, the key person should:

- Accompany the inspector throughout the inspection, keeping handwritten notes of his/her observations.
- Pay particular attention to those items of interests to the inspector.
- Take photographs (either during the inspection or after) of the same locations of items of interests to the inspector.
- Keep detailed notes of what happened during the inspection.

1.6.3 After the Inspection. The inspector's initial findings are usually reported informally at a closing conference. The actual violations and/fines may be given at this time. But keep in mind, further research or agency management review may be necessary.

1.7 Employee Independent Action Defense. The "Employee Independent Act" defense to an CAL/OSHA citation is based the Company doing everything correct but the employee commits a violation for which the Company is not liable. To be able to demonstrate that the Company has adopted and enforced an adequate safety program and that the employee was at fault, a strict test must be satisfied. The key to passing this test is documentation. This test, base on the "*Mercury Services Decision*", consists of :

- The employee was experienced in the job being performed (not a "temp" or new hire).
- Employer has a well-devised safety program which includes documented safety training specific to a particular job assignment and the hazards associated with it. Documented ongoing retraining
- Employer effectively implements the safety program.
- Employer has a policy of taking action against employees who violate safety requirements and is documented..
- The employee caused a safety infraction which he or she knew was contrary to the employer's safety rules.

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2.0 RESPONSIBLE PERSON(S)
GISO 3203(a)(1)

2.1 Assignment of Responsible Person(s)

This Injury and Illness Prevention Program has been reviewed and is hereby approved and supersedes any previous program that has been in effect since July 1, 1991.

The person or persons indicated in Section 2.2, Responsible Person(s), has the authority and responsibility for implementing and maintaining this Program.

Signature

Date

Title of Company Management

2.2 Responsible Person(s). Signature indicates that a copy of the program has been provided and responsibility and authority to implement and maintain this Program is understood.

Printed Name

Title

Signature

Date

3.0 EMPLOYEE COMPLIANCE WITH SAFE AND HEALTHY WORK PRACTICES

GISO 3203(a)(2)

3.1 Employee Compliance. Employees will comply with safe and healthily work practices. This will be ensured through:

1. Recognition of employees who follow safe and healthful work practices.
2. Training and retaining programs.
3. Disciplinary actions, up to and possibly including immediate termination.
4. Compliance with all aspects of this Injury and Illness Prevention Program is a condition of employment and will be evaluated, together with other aspects of an employee's performance.

3.2 Disciplinary Policy. Violations of Company policies, rules and safe and healthy work practices may warrant disciplinary action. This Company has established a system of progressive discipline that includes verbal warnings, written warnings, and suspension. The system is not formal and this Company may, in its sole discretion, utilize whatever form of discipline deemed appropriate under the circumstances, up to, and termination of employment. This Company's policy of progressive discipline in no way limits or alters the at-will employment relationship.

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**4.0 COMMUNICATION OF OCCUPATIONAL SAFETY AND HEALTH MATTERS
GISO 3203(a)(3)**

4.1 Communication of Occupational Health and Safety Matters. Our company directed safety and health communication program is a two-way communication system, in a form readily understandable by all affected employees, designed to encourage employees to inform us of hazards in the workplace without fear of reprisal.

4.2 Communication System. Employees will be kept informed concerning occupational safety and health matters through the following:

1. Safety Meetings.
2. Training Programs.
3. Posting of Notices.
4. Written Communication.
5. Anonymous Notification by Employees.

4.3 Anonymous Notification by Employees. Employees will be encouraged to use the Unsafe Condition/Safety Suggestion form to provide the company with necessary employee input to meet the objectives of this program. To allow for anonymous notification, by employees, of unsafe conditions of safety suggestions, employees do not have to sign or identify themselves on the form.

4.4 Safety Meetings. Safety meetings will be conducted on a regular basis. During the meeting the following will be discussed:

1. New hazards that have been introduced or discovered in the workplace.
2. Causes of recent accidents or injuries and the method adopted by the Company to prevent similar incidents in the future.
3. Employee reports of unsafe conditions and safety suggestions.
4. Safety or health training topic.
5. Other topics that may need reinforcement.
6. Employee feedback and questions.

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**5.0 IDENTIFICATION AND EVALUATION OF WORK PLACE HAZARDS
GISO 3204(a)(4)**

5.1 Identification of Work Place Hazards. Scheduled periodic hazard identification and inspections will be used to identify unsafe conditions and work practices.

5.2 Unsafe condition and work practices. Unsafe conditions and work practices found during Hazard Identification and Inspections will be documented.

5.3 Inspections. Inspections shall be made to identify and evaluate hazards when:

1. Whenever new substances, processes, procedures, or equipment are introduced to the workplace that represents a new occupational safety and health hazard.
2. Whenever the company is made aware of a new or previously unrecognized hazard.
3. When occupational injuries occur.
4. When threats of or workplace violence occur and when security risks are reported.

5.4 Employee Reporting of Hazards. Hazards, unsafe or unhealthy work conditions can be reported in the following ways:

1. Directly to his/her First Line Supervisor or any member of management.
2. Employee may also fill out an Unsafe Condition/Safety Suggestion form. Employee dose **not** have to sign this form.
3. All hazards reported by employees shall be given prompt and serious attention. All hazards reported will be documented. Employees will be informed when the situation is corrected or why it wasn't hazardous.

5.5 Protection From Hazards -- All employees will be protected from serious or imminent hazards until they are corrected.

5.6 Hazard Identification -- All hazards will be identified with a tag specifying the nature of the hazard, Hazard Class and date it was reported. The tag will stay on the hazard until it has been corrected. Equipment that presents an imminent hazard will also be locked out.

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5.7 Imminent Hazard -- When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, all exposed personnel shall be removed from the area except those necessary to correct the existing condition. Employees necessary to correct the hazardous condition shall be provided with the necessary safeguards.

5.8 Hazard Evaluation -- When communicating the class of hazard potential, created by a physical condition, method, substance or practice, the following system will be used to rate the hazard:

HAZARD RATING

Class "A" Hazard -- Any hazard, condition or practice that could cause imminent loss of life or body part and/or extensive loss of structure/equipment/material.

Class "B" Hazard -- Any condition or practice with potential of serious injury or property damage, but less severe than Class "A".

Class "C" Hazard -- Any condition or practice with probable potential of non-disabling injury or non-disruptive property damage.

5.9 Records. Records will be maintained of scheduled and periodic inspections to identify unsafe conditions and work practices. These records will include:

1. Name of person(s) conducting the inspection.
2. The unsafe condition or work practice identified.
3. The action taken to correct the identified unsafe condition or work practice.

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6.0 OCCUPATIONAL INJURY & ILLNESS INVESTIGATION GISO 3203(a)(5)

6.1 Investigation of Injuries, Illness and Accidents. All injuries, illnesses, or accidents will be investigated to determine if any preventable safety of health hazard contributed to the occurrence. The investigation will be conducted in a timely manner. Any hazardous condition or work practices that contributed to the injury, illness, or accident will be identified in accordance with Section 5.0 and abated in accordance with 7.0 of this Injury & Illness Prevention Program.

6.2 Reporting of Serious Occupational Injuries or Deaths to Cal/OSHA. In the event of a serious occupational injury or death, a report must be made to the local Cal/OSHA office. The report must be made as soon as possible, ***but no longer than eight hours after the employer knows***, or with diligent inquiry could have known, of the death, serious illness, or injury of its employee. The report may be made by telephone, telegraph, or facsimile.

Be aware of the provisions of AB2873, an administrative penalty of “not less than \$5,000” for failure to report a work-related fatality or serious injury as soon as possible. In addition, the new law contains a criminal enforcement provision for such violations against employers, officers, management officials and supervisors having direction, management, control or custody of any employment, place of employment or any other employee who fails to report a death or knowingly induces another to do so. The penalty for such an offense upon conviction is imprisonment for up to one year and a fine of up to \$15,000.

The report must include the following information:

- Time and date of incident.
- Employer’s name, address and phone number.
- Name and job title of the person reporting the accident.
- Address where the accident or event occurred.
- Name of person to contact at the accident site.
- Name and address of the injured employee or employees.
- Nature of injury or illness.
- Location to where the injured employee or employees were moved.
- Identification of any law enforcement agencies present at the site of the accident.
- Description of the accident and whether the accident scene or any of the equipment at the scene has been altered.

6.3 Serious Injury. An injury is defined as “*serious*” if:

- The employee dies on the job or in connection with a work-related injury or illness.
- The employee is hospitalized for more than 24 hours for reasons other than medical observation.
- The employee loses any part of the body or suffers permanent disfigurement.

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- 6.4 Injury, Illness & Accident Investigation.** All workplace accidents or near miss incidents and reported industrial injuries and illnesses will be investigated and documented. Questions to be asked in an accident investigation include:
- What happened?** The investigation will describe what took place that prompted the investigation; an injury to an employee, an incident that caused a production delay, damaged material or any question recognized as having a potential for losses or delays.
 - Why did the incident happen?** The investigation must obtain all the facts surrounding the occurrence: what caused the situation to occur; who was involved; was/were the employee(s) qualified to perform the functions involved in the accident or near miss; were they properly trained; were proper operating procedures established for the task involved; were procedures followed, and if not, why not; where else this or a similar situation might exist, and how it can be corrected.
 - What should be done?** The person conducting the investigation must determine which aspects of the operation or process require additional attention. It is important to note that the purpose is not to establish blame, but to determine what type of constructive action can eliminate the cause(s) of the accident or near miss incident.
 - What action has been taken?** Actions already taken to reduce or eliminate the exposures being investigated should be noted, along with those remaining to be addressed. Any interim or temporary precautions should also be noted. Any pending corrective action and reason for delaying it's implementation should be identified.
 - Corrective Action.** Corrective action should be identified in terms of not only how it will prevent a recurrence of the accident or near miss, but also how it will improve the overall operation. The solution should be a means of achieving not only accident control, but also total operation control.
- 6.5 Documentation & Records.** The accident investigation will be documented on an Accident Investigation Form and OSHA Form 301. Records will be maintained on all workplace accidents and reported industrial injuries and illnesses to determine any accident trends and to monitor corrective action.

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**7.0 CORRECTION OF UNSAFE CONDITIONS AND WORK PRACTICES
GISO 3203(a)(6)**

7.1 Correction of Unsafe Conditions and Work Practices. Unsafe or unhealthy conditions , work practices and work procedures will be corrected in a timely manner based on the severity of the hazard when observed or discovered.

7.2 Scheduling of Correction of Unsafe Conditions and Work Practices.

1. Class "A" Hazards will be abated immediately.

When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, remove all exposed personnel from the area except those necessary to correct the existing condition. Employees necessary to correct the hazardous condition shall be provided with the necessary safeguards.

2. Class "B" Hazards will be given prompt scheduling.
3. Class "C" Hazards will be scheduled.

7.3 Records. Records will be maintained of the action taken to correct identified unsafe conditions and work practices.

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8.0 TRAINING AND INSTRUCTION **GISO 3203(a)(7)**

8.1 Training and Instruction. Training and instruction is one of the most important elements of our Injury and Illness Prevention Program. It allows employees to learn their jobs properly, bring new ideas in the workplace, reinforces existing ideas and practices, and puts our program into effect. Our training and instruction program includes supervisors and employees.

8.2 Schedule of Training and Instruction. Training and instruction will be provided:

1. To all new employees.
2. To all employees given new job assignments for which training has not previously been received.
3. Whenever new substances, processes, procedures or equipment are introduced to the work place and represents a new hazard.
4. Whenever the Company is made aware of a new or previously unrecognized hazard.
5. For supervisors to familiarize themselves with the safety and health hazards to which employees under their immediate direction and control may be exposed.

8.3 Supervisor Training and Instruction. All Supervisors will receive training and instruction in the following areas:

1. Awareness that they are the primary safety and health trainers.
2. The company's safety and health policies and Injury and Illness Prevention Program.
3. Safety and health hazards of the workplace and how they are best controlled.
4. Accident investigation and how to take corrective and preventative action.
5. How to train their employees in the proper way of doing their job by setting a good example and instructing them.
6. Safety meetings.
7. Emergency Action Plan, Fire Prevention and Hazard Communication Program.
8. How to communicate to employees about safety and health matters.
9. Recognition of workplace security hazards.
10. Measures to prevent workplace violence, defuse hostile or threatening situations.
- 11.0 Two-hour Supervisor Harassment Training.

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8.4 Employee Training and Instruction. An effective Injury and Illness Prevention Program depends upon the actions of employees as well. All employees will know about the material and equipment they are working with, know what hazards are present and how they can be controlled or eliminated. Each employee will be trained in the following:

1. Potential occupational hazards identified in their workplace generally and those specifically related to their job alignments.
2. General Safety Rules and Code of Safe Practices.
3. How to report industrial accidents and illness and near misses incidents in the workplace.
4. Emergency Action Plan and Fire Prevention.
5. Disciplinary Action.
6. Use of Personal Protective Equipment.
7. Hazard Communication/Proposition 65.
8. Employee Rights and Responsibilities.
9. Access to employee exposure and medical records.
10. Recognition of workplace hazards.
11. Measures to prevent workplace violence, including procedures for reporting workplace security hazards or threats to supervisor and safety Coordinator.
12. Measures to summon others for assistance.
13. One-hour Harassment Training.

8.5 Refresher Training. Refresher training will be done yearly or more often as dictated by the hazards of the job/task being performed.

8.6 Records. Records of training and instruction will be maintained. These records will include the follow:

1. Employee name or identifier.
2. Training dates.
3. Type(s) of training.
4. Training provider.

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9.0 RECORD KEEPING **GISO 3203(b)**

9.1 Injury & Illness Prevention Program Record Keeping. Records of the steps taken to implement and maintain compliance with the Injury and Illness Prevention Program shall be maintained for three years. The following records, as a minimum, will be maintained:

1. Records of scheduled and periodic inspections required to identify unsafe conditions and work practices, including person(s) conducting the inspection, the unsafe condition and work practices that have been identified and action taken to correct the identified unsafe condition and work practices.
2. Documentation of safety and health training required for each employee, including name or identifier, training dates, type(s) of training, and training provider(s). These records shall be maintained for duration of employee employment.

9.2 Occupational Injury & Illness Records. The following steps are required by the Cal/OSHA record keeping system:

1. Obtain a report on every illness or injury requiring medical treatment.
2. Record each injury or illness on the Cal/OSHA Log and Summary of Occupational Injuries and Illnesses, Cal/OSHA Form 300, according to its instructions.
3. Prepare a supplementary record of the occupational injuries and illnesses on OSHA Form 301, or Employer's Report of Injury or Illness(Form 5020), with the same information.
4. Every year prepare the summary Cal/OSHA Form 300, post it no later than February 1 and keep it posted where employee can see it until April 30, or provide copies as required.
5. Maintain the last five years of these records in your files.

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**9.3 ACCESS TO EMPLOYEE EXPOSURE AND MEDICAL RECORDS
GISO 3204**

9.3.1. Scope and Purpose -- Employees and their designated representatives have the right of access to relevant exposure and medical records pertaining to their exposure to toxic substances or harmful physical agents.

9.3.2 Preservation of Records -- Employee exposure and medical records shall be preserved and maintained for at least the duration of employment plus thirty years.

9.3.3 Access to Records -- Whenever an employee or designated representative requests access to a record, the Company shall assure that access is provided in a reasonable time, place and manner, but in no event longer than fifteen days after the request is made. A copy of the record, when requested, shall be provided without cost to the employee.

9.3.4 Employee Information and Training -- Upon an employee's first entering into employment, and at least annually thereafter, they will be informed as to:

1. The existence, location and availability of any records covered by GISO 3204.
2. The person responsible for maintaining and providing access to records.
3. Their rights of access to the records.

9.3.5 Access to Regulations -- A copy of the GISO 3204 shall be kept readily available for review by employees.

10.0 WORKPLACE SECURITY & VIOLENCE PREVENTION

10.1 Workplace Security Policy

This company is committed to providing a violence-free workplace for our employees. In keeping with this commitment, the company has established a “zero-tolerance” anti violence policy that prohibits actual or threatened violence by employees against co-workers or other persons who are either on our premises or have contact with employees in the course of their duties. This policy is also intended to promote work place security by addressing situations which outsiders enter the workplace and engage in violent acts or threaten employees with violence. Although some kinds of violence results from social issues that are beyond our control, the company believes that it can adopt some measures that will increase security and protection for our employees. In order to accomplish these objects, we must require the cooperation of all employees. Safety and security in the workplace is every employee’s responsibility.

10.2 Compliance.

Compliance with this anti-violence policy is condition of employment and will be evaluated, together with other aspects of an employee’s performance. Due to the importance of this policy, employees who violate any of its terms, who engage in or contribute to violent behavior, or who threaten others with violence may be subject to disciplinary action, up to and possibly including termination.

10.3 Reporting of Threats and/or Actual Violence and Security Risks.

Threats.

Every verbal or physical threat of violence must be treated seriously and reported immediately to the employee’s supervisor or the Safety Coordinator. The Safety Coordinator will be responsible to consult with the appropriate resources and witnesses. This may include, in appropriate cases, consulting with the supervisor of the employee who made the threat, the threatened employee, and/or any witnesses. Where a violation of the policy is found, appropriate corrective action will be taken.

Imminent and/or Actual Violence.

In situations where an employee becomes aware of an imminent act of violence, a threat of imminent violence, or actual violence, emergency assistance must be sought immediately. In such situations the employee should immediately contact his supervisor and/or the Safety Coordinator and, if appropriate, contact the law enforcement authorities by dialing 911.

Security Risks.

Employees should immediately inform their supervisor about any workplace security risk or hazard. If any employee’s supervisor is not readily available, then the employee should immediately inform the Safety Coordinator so that appropriate action can be taken.

10.4 Early Warning Signs.

The company believes that employees may be better prepared to avoid or prevent violence if they are able to recognize warning signs in advance and follow appropriate response procedures. Employees will therefore play a crucial role in the administration of this anti-violence policy. It is not possible to predict or assume potential for violence based on any one of the early warning signs, but employees should understand that certain risk factors and behavior patterns may offer early warning signs of violent conduct. Examples of such warning signs include the following:

- * A history of emotional or mental disturbance.
- * A history of threatening or violent behavior.
- * Paranoia or easily panicked behavior.
- * A fascination or preoccupation with weapons, particularly weapons or explosives that could be used for mass destruction, such as semi-automation guns.
- * Extreme stress from personal problems or a life crisis.
- * Events affecting workplace conditions and/or generating stress.
- * Identifying with incidents of workplace violence reported in the media and either condoning or sympathizing with the actions of the individuals committing the violence.
- * Being a loner with little or no involvement with other employees.
- * Engaging in frequent disputes with supervisors or co-workers.
- * Routine violation of company policy.
- * Obsessive involvement with one's job, particularly where it occurs with no apparent outside interest.

If a supervisor becomes aware of risk factors and behavior patterns of the type described above, the supervisor should contact the Safety Coordinator. The Safety Coordinator shall evaluate and document the matter and provide the supervisor with direction and assistance to deal with the situation. If outside consultants or experts should be contacted, the Safety Coordinator shall do so.

10.5 Threats of Violence.

Every threat of violence is serious and must be treated as such. Threatening behavior can include such actions as:

- * Throwing objects.
- * Making a verbal threat to harm another individual or destroy property.
- * Making menacing gestures.
- * Expressing significant grudges against co-workers.
- * Displaying an intense or obsessive interest that exceeds the normal bounds of interpersonal interest.
- * Attempting to intimidate or harass other individuals.
- * Behavior indicating that the individual is significantly out of touch with reality and that he or she may pose a danger either to himself

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or herself or to others.

10.6 Cooperation and Questions

Full cooperation by all employees is necessary for the company to accomplish its goal of maximizing the security and safety of its employees. Employees should direct any questions they have regarding their obligation under this policy to the Safety Coordinator. Employees can report violations of the policy and raise any questions regarding their obligations or this policy without fear of reprisal of any kind.

11.0 DRUG-FREE WORKPLACE & ALCOHOL & MARIJUANA ABUSE POLICY

The Company is concerned about the use of alcohol, marijuana, illegal drugs or controlled substances as it affects the workplace. Use of these substances whether on or off the job can adversely affect an employee's work performance, efficiency, safety and health and therefore seriously impair the employee's value to the Company. In addition, the use or possession of these substances on the job constitutes a potential danger to the welfare and safety of other employees and expose the Company to the risks of property loss or damage, or injury to other persons. The use of prescription drugs and/or over-the-counter drugs also may affect an employee's job performance and seriously impair the employee's value to the Company.

11.1 Rules and Standards of Conduct. The follow rules and standards of conduct apply to all employees either on Company property or during the work day (including meals and rest periods). The following are *strictly prohibited* by the Company:

1. Possession or use of alcohol and/or marijuana, or being under the influence of alcohol and/or marijuana while on the job.
2. Driving a Company vehicle while under the influence of alcohol and/or marijuana.
3. Distribution, sale or purchase of alcohol, marijuana, illegal or controlled substance while on the job.
4. Possession or use of alcohol, marijuana, an illegal or controlled substance, or being under the influence of alcohol, marijuana ,an illegal or controlled substances while on the job.
5. Reporting for work or remaining on duty while under the influence of alcohol and/or marijuana, illegal or controlled substances.

11.2 Prescription or Over-The-Counter Drugs. Any employee who is using prescription or over-the-counter drugs that may impair the employee's ability to safely perform the job, or affect the safety or well-being of others, *must notify a supervisor of such use immediately before starting or resuming work.*

11.3 Violation of Rules and Policies. Violation of rules and standards of conduct will not be tolerated. Employees who violate these rules, standards of conduct and policies are subject to disciplinary action up to and including immediate discharge, even for a first offense.. The Company also may bring the matter to the attention of appropriate law enforcement authorities.

11.4 Employee's Conviction. An employee's conviction on a charge of illegal sale or possession of any controlled substance while off Company property will not be tolerated because such conduct, even though off duty, reflects adversely on the Company. In addition, the Company must keep people who sell or possess controlled substances off the Company's premises in order to keep the illegal or controlled substances themselves off the premises.

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11.5 Enforcement. In order to enforce this policy, the Company reserves the right to conduct searches of Company property or employees and/or their personal property, and to implement other measures necessary to deter and detect abuse of this policy.

11.6 Drug Screening. The Company's policy is to maintain a safe work working environment for its employees and as part of the program Drug Screening will be used to keep the workplace free from the use of illegal drugs and abuse of alcohol.

11.6.1 Pre-employment Drug Screening. The Company will conduct pre-employment screening examinations designed to prevent hiring individuals who use illegal drugs or individuals who use of legal drugs indicated a potential for impaired or unsafe job performance.

11.6.2 "For Cause" Drug Screening. An employee reporting for work or found working visibly impaired is deemed unable to properly performed required duties and will not be allowed to work. If possible, the employee's supervisor should first seek another supervisor's opinion to confirm the employee's status.

Per Labor Code 6300 et seq., an employer may request an employee to submit to a drug screening if the employee is jeopardizing the safety of the work environment.

The employee will be sent to the local clinic for a drug screen and suspended until the results of the test comes back. Appropriate disciplinary measures up through and including termination will take place for a positive result.

Any employee refusing the drug screening under this paragraph will be subject to termination on grounds of gross misconduct.

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- 11.7 Employee Assistance Program.** The Company will encourage and reasonably accommodate employees with chemical dependencies (alcohol or drug) to seek treatment and/or rehabilitation. To this end, employees desiring such assistance should request a treatment or rehabilitation leave. The Company is not obligated, however, to continue to employ any person whose performance of essential job duties is impaired because of drug or alcohol use, nor is the Company obligated to re-employ any person any person who has participated in treatment and/or rehabilitation if that person's job performance remains impaired as a result of dependency. Additionally, employees who are given the opportunity to seek treatment an/or rehabilitation, but fail to successfully overcome their dependency or problem, will not automatically be given a second opportunity to seek treatment and/or rehabilitation.

This policy on treatment and rehabilitation is not intended to affect the Company's treatment of employees who violate the rules and regulations stated above. Rather, rehabilitation is an option for an employee who acknowledges a chemical dependency and voluntarily seeks treatment to end that dependency before disciplinary action has to be taken.

12.0 UNLAWFUL HARASSMENT

12.1 Company Policy. The Company is committed to providing a work environment free of unlawful harassment. Company policy prohibits sexual harassment, and harassment based on pregnancy, childbirth or related medical conditions, race, religious creed, color, national origin or ancestry, physical or mental disability medical condition, marital status, age, sexual orientation or any other basis protected by federal, state or local law or ordinance or regulation. All such harassment is unlawful. The Company's anti-harassment policy applies to all persons involved in the operation of the Company and prohibits unlawful harassment by any employee of the Company, including supervisors and co-workers.

12.2 Prohibited Harassment. Prohibited unlawful harassment includes, but is not limited to, the following behavior:

- a. Verbal conduct such as epithets, derogatory jokes or comments, slurs or unwanted sexual advances, invitations or comments;
- b. Visual conduct such as derogatory and/or sexually-oriented posters, photography, cartoons, drawings or gestures;
- c. Physical conduct such as assault, unwanted touching, blocking normal movement or interfering with work because of sex, race or any other protected basis;
- d. Threats and demands to submit to sexual requests as a condition of continued employment, or to avoid some other loss, and offers of employment benefits in return for sexual favors; and
- e. Retaliation for having reported or threatened to report harassment.

12.3 Complaint Procedure. The Company encourages all employees and independent contractors to report any incidents of harassment forbidden by this policy immediately so that complaints can be quickly and fairly resolved. If you believe that you have been unlawfully harassed, provided a written complaint to your own or any other company supervisor, personnel administrator or the president of the Company as soon as possible after the incident. Your complaint should include details of the incident or incidents, names of the individuals involved and names of any witnesses. Supervisors will refer all harassment complaints to the personnel administrator, investigative officer or the president of the Company. The Company will immediately undertake an effective, thorough and objective investigation of the harassment allegations.

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- 12.4 Disciplinary Action.** If the Company determines that unlawful harassment has occurred, effective remedial action will be taken in accordance with the circumstances involved. Any employee determined by the Company to be responsible for unlawful harassment will be subject to appropriate disciplinary action, up to the including termination. A Company representative will advise all parties concerned of the results of the investigation. The Company will not retaliate against you for filing a complaint and will not tolerate or permit retaliation by management, employees or co-workers.
- 12.5 Additional Information.** The Federal Equal Employment Opportunity Commission and the California Department of Fair Employment and Housing will also investigate and prosecute complaints of prohibited harassment in employment. If you think you have been harassed or that you have been retaliated against for resisting or complaining, you may file a complaint with the appropriate agency. The nearest office is listed in the telephone book.
- 12.6 Training.**
Supervisors shall receive two (2) hours of training every two (2) years.
Employees (non-supervisors) shall receive one (1) hour of training every two years.

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13.0 PERSONAL PROTECTIVE EQUIPMENT

13.1 Employee Protection. Personal Protective Equipment (PPE) will be provided for employees when:

1. Their work environment presents a hazard or is likely to present a hazard to any part of their bodies; or
2. Their work processes present a hazard or are likely to present a hazard to any part of their bodies; or
3. During their work, they might come into contact with hazardous chemicals, radiation, or mechanical irritants; and
4. The company is unable to eliminate their exposure or potential exposure to the hazard by engineering, work practice, or administrative controls.

13.2 Cost of Personal Protective Equipment. The California Labor Code, Section 6401, requires that:

“Every employer shall furnish and use safety devices and safeguards, and shall adopt and use practices, means, methods, operations and processes that are reasonably adequate to render such employment and place of employment safe and healthful.”

This provision is interpreted to require employers to furnish at no cost to employees, any required personal protective equipment.

13.3 Hazard Assessment. A hazard assessment will be conducted to identify hazards that are present in the workplace that employees are or may be exposed.

13.4 Personal Protective Equipment Assessment. Based on the findings of the Hazard Assessment, appropriate types of PPE will be prescribed. PPE selected will conform to the standards established for the type of equipment used. The design and condition of the PPE must be sufficient to control the hazard identified.

13.5 Use of Personal Protective Equipment. PPE must be properly maintained and kept in a sanitary condition. Interchange of PPE between employees is prohibited unless effectively cleaned between users. It must fit comfortably and not unduly encumber the employee’s movement to perform work.

13.6 Periodic Inspections. Periodic inspections will be conducted to verify that employees are properly using PPE and that the PPE provided is functionally properly in controlling recognized hazards. Attention will also be given to determining whether there are any previously unrecognized hazards in the workplace that would be suitable to control by PPE.

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13.7 Employee Training. Employees will be trained on the hazards controlled by the PPE, its limitations, proper use and care of the selected PPE.

13.8 Employee Responsibilities. It is the responsibility of all employees to comply with the following:

1. Employees must wear or use all PPE as directed when workplace hazards are present.
2. Employees must exercise care and responsibility with respect to PPE, including proper adjustment, sanitation, cleaning and safeguarding to assure its continued availability.
3. PPE should be properly fitted and adjusted during use to assure maximum effectiveness against hazards.
4. Protective clothing, gloves and other body protection must not be worn in a loose fitting manner that could get caught on moving machinery or equipment.
5. Employees are prohibited from having unbound long hair or wearing loose clothing or jewelry and/or gloves that may become entangled in moving machinery.
6. Employees must immediately report any problem associated with PPE including malfunction, discomfort, ineffectiveness, unsanitary condition or loss.
7. Employees are prohibited from modifying, in any manner, the PPE provided to them.

13.9 Head Protection (8CCR §3381). Head protection is required when there is a falling object or electrical hazard. Helmets or “hard hats” provided must meet ANSI requirements. If there is a risk of hair entanglement in machinery, combustibles or toxic contaminants, it must be confined to eliminate the hazard..

13.10 Eye and Face Protection (8CCR §3382). Eye or face protection is required when there is a risk of eye injury from flying particles, hazardous substances, projectiles, or light rays and laser exposure. When employees require vision correction, the employer must provide either safety spectacles with corrective lenses, safety goggles or a face shield over spectacles. Contact lenses are not allowed in workplaces with hazardous substance exposure. Eye and face protection must meet the applicable ANSI standard.

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- 13.11 Body Protection (8CCR §3383).** Body protection should be provided to employees potentially exposed to hazardous substances and projectiles capable of causing bodily injury. The body protection, if clothing, must be appropriately fitted and not loose enough to become entangled in equipment or moving machinery. If protective clothing becomes saturated with hazardous substances, it must be removed and properly cleaned.
- 13.12 Hand Protection (8CCR §3384).** Hand protection must be provided when there is a hazard from cuts, burns, hazardous substances, etc. Hand protection should be selected to provide appropriate protection against the physical and chemical hazards encountered. *Gloves must not be worn if they could become entangled in moving machinery (nor should rings, watches and other jewelry).*
- 13.13 Foot Protection (8CCR §3385).** Foot protection is required for employees exposed to foot injuries from hot or hazardous substances, falling objects, crushing or penetrating actions or wet locations. Inappropriate footwear must not be worn in hazardous situations. Protective footwear must meet ANSI standards.
- 13.14 Medical Services and First Aid (8CCR §3400).** In the absence of an infirmary, clinic, or hospital, in near proximity to the workplace, persons shall be adequately trained to render First Aid and CPR. There shall be adequate first-aid materials, approved by the consulting physician, readily available for employees. Where the eyes or body of any person may be exposed to injurious corrosive materials, suitable facilities for quick drenching or flushing of the eyes and body shall be provided within the work area for immediate emergency use.

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14.0 HEAT ILLNESS PREVENTION

14.1 Scope and Application. This section applies to the control of risk of occurrence of heat illness in accordance with GISO 3395.

14.2 Definitions.

"Acclimatization" means temporary adaptation of the body to work in the heat that occurs gradually when a person is exposed to it. Acclimatization peaks in most people within four to fourteen days of regular work for at least two hours per day in the heat.

"Heat Illness" means a serious medical condition resulting from the body's inability to cope with a particular heat load, and includes heat cramps, heat exhaustion, heat syncope and heat stroke.

"Environmental risk factors for heat illness" means working conditions that create the possibility that heat illness could occur, including air temperature, relative humidity, radiant heat from the sun and other sources, conductive heat sources such as the ground, air movement, workload severity and duration, protective clothing and personal protective equipment worn by employees.

"Personal risk factors for heat illness" means factors such as an individual's age, degree of acclimatization, health, water consumption, alcohol consumption, caffeine consumption, and use of prescription medications that affect the body's water retention or other physiological responses to heat

"Preventative recovery period" means a period of time to recover from the heat in order to prevent heat illness.

"Shade" means blockage of direct sunlight. Canopies, umbrellas and other temporary structures or devices may be used to provide shade. One indicator that blockage is sufficient is when objects do not cast a shadow in the area of blocked sunlight. Shade is not adequate when heat in the area of shade defeats the purpose of shade, which is to allow the body to cool. For example, a car sitting in the sun does not provide acceptable shade to a person inside it, unless the car is running with air conditioning.

14.3 Provision of Water. Employees shall have access to potable drinking water. Where it is not plumbed or otherwise continuously supplied, it shall be provided in sufficient quantity at the beginning of the work shift to provide one quart per employee per hour for drinking for the entire shift. Employers may begin the shift with smaller quantities of water if they have effective procedures for replenishment during the shift as needed to allow employees to drink one quart or more per hour. The frequent drinking of water, as described in section 14.5, shall be encouraged.

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- 14.4 Access to Shade.** Employees suffering from heat illness or believing a preventative recovery period is needed, shall be provided access to an area with shade that is either open to the air or provided with ventilation or cooling for a period of no less than five minutes. Such access to shade shall be permitted at all times. Except for employers in the agricultural industry, cooling measures other than shade (e.g., use of misting machines) may be provided in lieu of shade if the employer can demonstrate that these measures are at least as effective as shade in allowing employees to cool.
- 14.5 Employee Training.** Training in the following topics shall be provided to all supervisory and non-supervisory employees.
1. The environmental and personal risk factors for heat illness.
 2. The employer's procedures for complying with the requirements of this section.
 3. The importance of frequent consumption of small quantities of water, up to 4 cups per hour, when the work environment is hot and employees are likely to be sweating more than usual in the performance of their duties.
 4. The importance of acclimatization.
 5. The different types of heat illness and the common signs and symptoms of heat illness.
 6. The importance to employees of immediately reporting to the employer, directly or through the employee's supervisor, symptoms or signs of heat illness in themselves, or in co-workers.
 7. The employer's procedures for responding to symptoms of possible heat illness, including how emergency medical services will be provided should they become necessary.
 8. The employer's procedures for contacting emergency medical services, and if necessary, for transporting employees to a point where they can be reached by an emergency medical service provider.
 9. The employer's procedures for ensuring that, in the event of an emergency, clear and precise directions to the work site can and will be provided as needed to emergency responders.
- 14.6 Supervisor Training.** Prior to assignment to supervision of employees working in the heat, training on the following topics shall be provided:
1. The information required to be provided by section 14.5 above.
 2. The procedures the supervisor is to follow to implement the applicable provisions in this section.
 3. The procedures the supervisor is to follow when an employee exhibits symptoms consistent with possible heat illness, including emergency response procedures.

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15.0 EMPLOYEE ACCESS TO THE PROGRAM

3203 (a)(8) Employee Access to the Program. Access means the right and opportunity to examine and receive a copy of the IIPP. Whenever an employee or authorized representative requests access to the IIPP, the employer shall ensure that access is provided in a reasonable time, place, and manner, but in no event later than five (5) days after the request is received.

Written Authorization means a form containing:

Name and signature authorizing an authorized representative to access the Program on the employee's behalf;

The date upon which written authorization will expire;

The date of the request;

Copy of Program shall be provided at no cost to employee or authorized representative in either paper or electronic format. Employer may charge reasonable copying expense for additional copies.