



WENGER
C O M P A N I E S

HEALTH AND SAFETY POLICY

WengerCompanies.com

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Wenger Companies Health and Safety Policy

Every employer should have a written Injury and Illness Prevention Plan. **This Policy and the Wenger Companies Safety Manual** presents our plan. Please read and refer to it carefully. While no plan can guarantee an accident free work place, following the safety procedures set forth in this policy and manual will significantly reduce the risk of danger to you and your co-workers. Thank you for all our safety

Introduction to Our Program

State and federal law, as well as company policy, makes the safety and health of our employees the first consideration in operating our business. Safety and health is our business must be a part of every operation, and every employee's responsibility at all levels. It is the intent of WENGER COMPANIES. to comply with all laws concerning the operation of the business and the health and safety of our employees and the public. To do this, we must constantly be aware of conditions in all work areas that can produce or lead to injuries. No employee is required to work at a job know to be unsafe or dangerous to their health. Your cooperation in detecting hazards, reporting dangerous conditions, and controlling workplace hazards is a condition of employment. Inform your supervisor immediately of any situation beyond your ability or authority to correct. Employees will not be disciplined or suffer and retaliation for reporting a safety violation in good faith.

Safety First Priority

The personal safety and health of each employee of WENGER COMPANIES. is of primary importance. Prevention of occupationally-induced injuries and illnesses is of such consequence that it will be given precedence over operating productivity. To the greatest degree possible, management will provide all mechanical and physical protection required for personal safety and health, but our employees must bear primary responsibility for working safely. A little common sense and caution can prevent most accidents from occurring.

Individual Cooperation Necessary

WENGER COMPANIES. maintains a safety and health program conforming to the best practices of our field. To be successful, such a program must embody proper attitudes towards injury and illness prevention on the part of supervisors and employees. It required the cooperation in all safety and health matters, not only of the employer and employee, but between the employee and all co-workers. Only through such a

cooperative effort can a safety program in the best interest of all be established and preserved. Safety is no accident; think safety and the job will be safer.

Safety Program Goals

The objective of WENGER COMPANIES. is a safety and health program that will reduce the number of injuries and illnesses to an absolute minimum, not merely in keeping with, but surpassing the best experience of similar operations by others. Our goal is zero accidents and injuries.

Safety Policy Statement

It is the policy of WENGER COMPANIES. that accident prevention shall be considered of primary importance in all phases of operation and administration. It is the intention of WENGER COMPANIES.'s management to provide safe and healthy working conditions and to establish and insist upon safe practices at all times by all employees.

The prevention of accidents is an objective affecting all levels of our company and its operations. It is, therefore, a basic requirement that each supervisor make the safety of all employees an integral part of each employee to accept and follow established safety regulations and procedures.

Every effort will be made to provide adequate training to employees. However, if an employee is ever in doubt about how to do a job or task safely, it is his or her duty to ask a qualified person for assistance. Employees are expected to assist management in accident prevention activities. Unsafe conditions must be reported immediately. Fellow employees that need help should be assisted. Everyone is responsible for the housekeeping duties that pertain to their jobs.

Every injury that occurs on the job, even a slight cut or strain, must be reported to management and/or the Safety Director as soon as possible. Under no circumstances, except emergency trips to the hospital, should an employee leave the work site without reporting an injury. When you have an accident, everyone is hurt. Please work safely. Safety is everyone's business.

Safety Rules for All Employees

It is the policy of WENGER COMPANIES. that everything possible will be done to protect you from accidents, injuries, and/or occupational disease while on the job. Safety is a cooperative undertaking requiring and ever-present safety consciousness on the part of every employee. If an employee is injured, positive action must be taken promptly to see that the employee receives adequate treatment. No one likes to see a fellow employee injured by an accident. Therefore, all operations must be planned to prevent accidents. To carry out this policy, the following rules will apply:

1. All employees shall follow the safe practices and rules contained in this manual and such other rules and practices communicated on the job. All employees shall report all unsafe conditions or practices to the proper authority, including the supervision on the project.
2. The PRESIDENT or his appointee shall be responsible for implementing these policies by communicating through supervisors that employees observe and obey all rules and regulations necessary to maintain a safe work place and safe work habits and practices.
3. Good housekeeping must be practiced at all times in the work area. Clean up all waste and eliminate all dangers in the work area.
4. Suitable clothing and footwear must be worn at all times. Personal protection equipment (hardhats, respirators, eye protection) will be worn whenever needed.
5. All employees will participate in a safety meeting conducted by their supervisor once every ten working days.
6. Anyone under the influence of intoxication liquor or drugs, including prescription drugs which might impair motor skills and judgment, shall not be allowed on the job.
7. Horseplay, scuffling, and other acts which tend to have an adverse influence on safety or well-being of other employees are prohibited.
8. Work shall be well planned and supervised to avoid injuries in the handling of heavy materials and while using equipment.
9. No one shall be permitted to work while the employee's ability or alertness is so impaired by fatigue, illness, or other causes that it might expose the employee or other causes that it might expose the employee or others to injury.
10. There will be no consumption of liquor or beer on the job.
11. Employees should be alert to see that all guards and other protective devices are in proper places and adjusted, and shall report deficiencies promptly to the PRESIDENT or his appointee.
12. Employees shall not handle or tamper with an electrical equipment, machinery, or air or water lines in a manner not within the scope of their duties, unless they have received specific instructions.
13. All injuries should be reported to the PRESIDENT or his appointee so that arrangements can be made for medical or first aid treatment.
14. When lifting heavy objects, use the large muscles of the leg instead of the smaller muscles of the back.
15. Do not throw things, especially material and equipment. Dispose of all waste properly and carefully. Bend all exposed nails so they do not hurt anyone removing the waste.

16. Operating a licensed vehicle requires a valid state driver's license. State laws and regulations apply to such operation and seat belts must be used at all times by driver or any passengers.

Safety Director

The identity of the person who is responsible for the WENGER COMPANIES's safety program is Howard Wenger or any other appointee he designates to carry out the program. This person must be someone of sufficient authority to implement the program's requirements. In addition to other titles, this person is referred to as the Safety Director.

Designated

In accordance with the WENGER COMPANIES safety and injury prevention program, Howard Wenger or his appointee, has been designated as the Safety Director, and has responsibility and authority to do the following in the name of WENGER COMPANIES.:

1. Develop and implement rules of safe practices for each function within the company.
2. Develop and implement safe operating rules for use of electrical and mechanical equipment consistent with manufacturer's recommendations and specifications.
3. Develop and implement a system to encourage employees to report unsafe conditions immediately.
4. Conduct a thorough investigation of each accident, whether or not it results in an injury, to determine the cause of the accident and to prevent recurrence. In cases of a known injury accident, the investigation shall proceed only after consultation with WENGER COMPANIES. attorneys, who shall direct the investigation (the product of which investigation shall be considered the work product of the attorney).
5. Instruct supervisors in safety responsibilities.
6. Develop and implement a program of employee safety education.
7. Conduct scheduled and unscheduled inspections to identify and correct unsafe working conditions. Special attention shall be given to notice of serious concealed dangers.
8. Maintain records of training, periodic inspections, corrective actions, and investigations as required by law.

The Safety Director for WENGER COMPANIES. is Howard Wenger or his appointee. WENGER COMPANIES. will inform every person of the name of the Safety Director and

post his or her name and telephone/office number on the bulletin board where all other safety information is routinely maintained.

Duties

Overall responsibility and authority for implementing the injury and illness prevention program is vested in HOWARD WENGER or his appointee, the Safety Director. Management fully supports the Safety Director. As part of the job, the Safety Director will supplement this written injury and illness prevention program by establishing workplace objectives and safety recognition programs; working with all government officials in both accident investigation and safety inspection procedures; maintaining safety and individual training records; encouraging reporting of unsafe conditions and promoting a safe workplace. Some of these responsibilities will be delegated to your immediate supervisor for implementation.

Agreement to Participate

Every employer is required to provide a safe and healthful workplace WENGER COMPANIES. is committed to fulfilling this requirement. A safe and healthful workplace is one of the highest priorities of WENGER COMPANIES.

The information in this policy constitutes a written injury and illness prevention program. While WENGER COMPANIES cannot anticipate every workplace hazard, the following general principals should guide your conduct. To be safe, you must never stop being safety conscious.

Study the guidelines contained in this manual. Discuss the workplace situation with the PRESIDENT. Attend all company sponsored training and safety meetings. Read all posters and warnings. Listen to instructions carefully. Follow the Code of Safe Work Place Practices contained herein. Participate in accident investigations as requested. Accept responsibility for the safety of others. Maintain all required documentation.

By signing the acknowledgement on the cover sheet, each employee promises to read and implement this injury and illness prevention program. If you don't understand any policy, please ask your supervisor.

Training

Employee safety training is another requirement of an effective injury and illness prevention program. While WENGER COMPANIES. believes in skills training, we also want to emphasize safety training. All employees should start the safety training by reading this manual and discussing any problems or safety concerns with your direct supervisor. You may wish to make notes in the margins of this manual where it applies to your work.

Safety and Health Training

Training is one of the most important elements of any injury and illness prevention program. Such training is designed to enable employees to learn their jobs properly, bring new ideas to the workplace, reinforce existing safety policies and put the injury and illness prevention program into action.

Training is required for both supervision and employees alike. The content of each training session will vary, but each session will attempt to teach the following:

- a. the success of WENGER COMPANIES injury and illness prevention program depends on the actions of individual employees as well as a commitment by the Company.
- b. each employee's immediate supervisor will review the safe work procedures unique to that employee's job, and how these safe work procedures protect against risk and danger.
- c. each employee will learn when personal protective equipment is required or necessary, and training on how to use and maintain the equipment in good condition. Retraining will be offered on an annual basis.
- d. each employee will learn what to do in case of emergencies occurring in the workplace. Supervisors are also vested with special duties concerning the safety of employees. The supervisors are key figures in the establishment and success of WENGER COMPANIES injury and illness prevention program. They have primary responsibility for actually implementing the injury and illness prevention program, especially as it relates directly to the workplace. Supervisors are responsible for being familiar with safety and health hazards to which employees are exposed, how to recognize them, the potential effects of these hazards, and rules and procedures for maintaining a safe workplace. Supervisors shall convey this information to the employees at the workplace, and shall investigate accidents according to the accident investigation policies contained in this manual.

Periodic Safety Training Meetings

WENGER COMPANIES has safety meetings on a weekly basis at minimum. The purpose of the meeting is to convey safety information and answer employee questions. The format of most meetings will be to review, in language understandable to every employee, the content of the injury prevention program, special work site hazards, serious concealed dangers, and material safety data sheets. Each week, your supervisor will review a portion of the company's safe work practices or other pertinent safety related information. Whenever a new practice or procedure is introduced into the

workplace, it will be thoroughly reviewed for safety. A sign-up sheet will be passed around each meeting. Employee attendance is mandatory and is compensable.

WENGER COMPANIES. employees will participate in an annual company wide safety meeting at least once each year.

Employee Responsibility for Training

Teaching safety is a two-way street. WENGER COMPANIES. can preach safety, but only employees can practice safety. Safety education requires employee participation.

Every year a meeting of all employees will be conducted for the purpose of safety instruction. The employees will discuss the application of the Company's injury and illness prevention program and Drug Free Workplace program.

Remember, the following general rules apply in all situations:

- a. no employee should undertake a job that appears to be unsafe.
- b. no employee is expected to undertake a job until he/she has received adequate safety instructions, and is authorized to perform the task.
- c. no employee should use chemicals without fully understanding their toxic properties and without the knowledge required to work with these chemicals safely.
- d. mechanical safeguards must be kept in place.
- e. employees must report any unsafe conditions to the job site supervisor and the Safety Director.
- f. any work-related injury or illness must be reported to management at once.
- g. personal protective equipment must be used when and where required. All such equipment must be properly maintained.

Communication

Employers should communicate to employees their commitment to safety and to make sure that employees are familiar with the elements of the safety program. WENGER COMPANIES. communicates with its employees orally, in the form of directions and statements from your supervisor, written, in the form of directives and this manual, and by example. If you observe a supervisor or management doing something unsafe, please call that to their attention. We sometimes forget that actions speak louder than words.

Hazcom and SDS

Although few harmful chemicals are used in the day to day work of our company, in the event that a hazard is identified, the Safety Director will properly label the hazard and

notify supervisors of the accompanying Material Safety Data Sheets for employee inspection.

Accident Prevention Policy

Each employee has a personal responsibility to prevent accidents. You have a responsibility to our family, to your fellow workers and to the Company. You will be expected to observe safe practice rules and instructions relating to the efficient handling of your work.

Your responsibilities include the following:

- Incorporate safety into every job procedure. No job is done efficiently unless it has been done safely.
- Know and obey safe practice rules.
- Know that disciplinary action may result from a violation of the safety rules.
- Report all injuries immediately, no matter how slight the injury may be.
- Caution fellow workers when they perform unsafe acts.
- Don't take chances.
- Ask questions when there is any doubt concerning safety.
- Don't tamper with anything you do not understand.
- Report all unsafe conditions or equipment to your supervisor immediately.

Safety Manual

The Wenger Companies Safety Manual provides specific information pertaining to our WENGER COMPANIES. Health and Safety Plan. In addition you will find specific information relating to the reporting and investigation of accidents.