



Safety and Health Policy

F.D. Thomas, Inc. (FDT) understands the importance of a safe and healthy work environment for our employees, subcontractors and other affected by our tasks. Our success to safety is our Illness and Injury Prevention Program (IIPP) which complies with all applicable OSHA standards and follows all generally accepted safety and industrial hygiene practices.

Responsibility

By combining awareness of actual working conditions and challenges facing workers and supervisors with knowledge of governmental regulations and owner needs, FDT has developed an effective IIPP. Compliance with our IIPP insures that we place safety first in all that we do and on all of our jobs. Most importantly, every member of the FDT team is committed to safety. We believe that safety is an integral part of productivity.

Individual Responsibilities

The President

The President is ultimately responsible for the safety and health of all employees of FDT. To fulfill this responsibility, the President will commit to:

- Providing the resources necessary to implement the safety and health program effectively.
- Communicating that all foremen or “supervisors” are capable of implementing the program through ongoing education and training.
- Providing the resources necessary so that all supervisors are competent in the identification of existing hazards and have the authority to take prompt corrective action to eliminate them.
- Providing the resources so that all training, medical, inspection and accident records are provided and maintained.
- Arranging for periodic evaluation of this program at least annually.

Supervisors

Supervisors are responsible for the safety of their work crews and the areas they work in. To fulfill this responsibility, they are expected to:

- Recognize and evaluate the hazards of all work activities during pre-job planning.
- Determine the means for controlling hazards, as required by this program and OSHA standards.
- Routinely inspect work areas and equipment for hazards and deficiencies and take prompt action to eliminate them.
- Routinely observe the actions of their work crews for unsafe or non-compliant acts and take immediate action to prevent injury or illness and comply with program requirements.
- Conduct weekly safety meetings with their work crews, as educational and training sessions, and maintain records of meeting topics and attendance.
- Ensure that their workers are provided the proper tools, supplies, and equipment necessary for the job and ensure they are properly maintained.

- Ensure that approved personal protective equipment is provided to all affected employees, that this equipment is properly inspected, maintained, used, and that all affected employees are qualified to use this equipment.
- Ensure that their workers are provided with the training necessary to comply with OSHA standards and to perform their jobs safely.
- Conduct investigations of all accidents, injuries, illnesses, and near misses to accurately determine the causes and actions necessary for preventing future occurrences.
- Maintain and OSHA 300 log of all injuries and illnesses.
- Comply with all sections of this program and all applicable OSHA standards.

Corporate Safety Manager

The Corporate Safety Manager will be responsible for the following:

- Serving as an advisor to the Supervisors and Management.
- Coordinating, standardizing and maintaining the FD Thomas Inc. safety program and policy development.
- Monitoring the implementation and enforcement of the Illness and Injury Prevention Program.
- Coordinating, standardizing and maintaining the FD Thomas Inc. workers' compensation claims administration and Early Return-To-Work Program.
- Representing in the promulgation, changing or amending of regulations that govern construction safety and health, or workers compensation.
- Assisting Management during OSHA hearings, resolving OSHA fines, etc.
- Training Managers and Supervisor, or other company staff regarding safety, health or workers compensation related issues.
- Maintaining safety files including training records, medical reports, inspection records and accident investigation records.

Employees

Every Employee is responsible for cooperating with their supervisors to ensure their own safety, the safety of their fellow workers, and the areas they work in.

To fulfill this responsibility, they will:

- Comply with all rules, OSHA regulations, and procedures that are part of this program.
- Attend and participate in all required training and meetings.
- Inspect all tools and equipment for defects and proper operation before use.
- Use all tools and equipment in a safe manner consistent with manufacturers' instructions.
- Consistently act in a safe manner, being constantly aware of their surroundings, work conditions, equipment operation, and activities of others.
- Immediately report all safety and health hazards to their supervisor.
- Assist supervisors in accident investigations to ensure that unsafe acts and conditions are identified and proper corrective measures are implemented.

Competent Person

FDT provides a competent person to oversee each project. The competent person may be the site supervisor, foreman or project manager. The competent person has complete responsibility and authority to implement the portions of this safety and health program which are applicable to the project. The competent person reports directly to upper management. At painting projects involving the removal of potentially hazardous materials, the competent person is responsible for:

- Controlling access to the site and designating contaminated work zones.
- Overseeing air monitoring and ensuring the minimizing of emissions to air, water and soil.
- Verifying that engineering controls are functioning properly.
- Supervising employee exposure (air and biological) monitoring and employee notification.
- Ensuring Hazard communication training for all workers on-site.
- Ensuring workers have been issued and trained in the use of personal protective equipment.
- Ensuring workers have training in the types of exposure control methods.
- Ensuring workers have been trained in the use of personal hygiene facilities.
- Ensuring workers have been trained in decontamination practices.
- Documenting compliance with this safety and health program by completing forms appended to this program or any equivalent form which provides similar information.

Written Safety Procedures

The FDT, Illness and Injury Prevention Program clearly defines proper policies, procedures and rules for preventing work related accidents, injuries and illnesses in compliance with OSHA regulations and specific standards for the specialty construction and painting industry. We are continuously refining our manual to stay current with changing regulations and practices. Every year, our President and Safety Manager review the manual for accuracy, content, completeness, and effectiveness. We have included a comprehensive review section that we use as a refresher for tailgate meetings and our annual employee training.

Inspections

Every job site is inspected daily for compliance with all applicable regulations, standards, and policies. Inspections are documented and filed with the corporate safety department and included as part of the job file for each project. Job Site Safety Inspection Reports are filed and reviewed for non-compliance and effectiveness. We act upon these filings immediately to ensure that any issues detected are corrected expeditiously. Any critical safety issues will result in the immediate shutdown of the job site. Our Safety Manager and/or the On-Site Coordinators are authorized to shutdown any site deemed unsafe.

The Safety Manager performs periodic safety inspections. The Project Supervisor performs more frequent inspections. All near misses, incidents, accidents, injuries or illnesses are documented and investigated by the Safety Manager. By incorporating historical trends into our investigative and review processes, we are able to help prevent accidents and injuries making sure that past incident do not repeat themselves.

All employees are required to follow company and client safety rules and regulations as a condition of employment. Failure to do so results in appropriate disciplinary actions (verbal warning, written warnings, and termination).

Hazard Identification

As a routine exercise, all tasks that will be performed by FDT are examined for hazards known to be part of our industry, including removal or installation of chemical products. These tasks are identified for the client and employees through 'Haz-Com Packages', which are assembled and provided to the client and the FDT supervisor prior to the start of a job, regardless of the size of the project. MSDS, Pre-job Hazard Analysis, and Site-specific Safety Procedures are reviewed and used in conjunction with pre-job meetings to coordinate the overall effectiveness of each program.

As each project is inherently unique, we rely on the ability to communicate openly with the client and/or general contractor to review and modify policy and procedure to provide the best overall program possible.

Inter-Company Communication

All FDT personnel are encouraged to participate with safety reports, suggestions and complaints. Each person on a crew is asked to lead a weekly toolbox meeting on a rotating basis, and will also frequently be requested to accompany a supervisor on a site inspection. Our employees are involved with all aspects of our safety program and truly own our safety policies and procedures which helps ensure a high degree of compliance and cooperation.

Our Safety Committee is chaired by our Safety Manager and comprised of a small group of site-safety coordinators and field personnel. A monthly Safety Committee meeting is conducted by the Safety Manager by conference call or by written monthly safety memo reviewing incidents, current safety procedures and future issues that require information/input from the members of the Safety Committee. Our personnel travel extensively and this format of information exchange and safety procedure implementation has proven effective. Our meetings are documented and posted for the use of all employees.

All job sites have a posting of corporate officers to contact in event of an emergency, and all personnel are encouraged to contact any of those officers to lodge any type of a complaint, report or suggestion, especially if there is a safety issue involved. Their employment is secure in all reporting so long as legitimate and accurate facts are conveyed.

Training and Education

Every employee and supervisor is trained on all aspects of work at FDT. Before a new hire is assigned to the job, he/she is drug tested. Upon passing the test, our employees are trained extensively on specific policies and procedures necessary to complete work in a safe manner. Hazard Communication and Injury Prevention and Reporting are explained thoroughly and specifically on each project. All new hires receive an employee handbook and are instructed on the "FDT Basics" by video or book presentation.

On a weekly basis, each job site conducts a tailgate, or "toolbox", safety meeting to reinforce the importance of safety with the entire crew. Keeping safety at the forefront in our employees' everyday work routine is a key to FDT's outstanding safety record. Meeting minutes are recorded and filed at the job site and with corporate.

Training for safety, health, regulations, law, violence, relations, and quality is conducted at the FDT corporate office, satellite offices, job sites, union training facilities, and/or clients' facilities by the FDT Safety Manager, FDT field safety coordinator, Union instructors and/or vendor personnel. These training materials are documented and reviewed periodically for updates.

Annually, FDT brings all of its supervisory personnel (field and corporate) together to attend team training on various subjects. The team provides much input during these sessions which is used to modify policies and procedures.

Many tasks that are part of our scope of work require specific certifications for workers and supervisors, such as Asbestos abatement, Lead abatement, Polyurethane Foam application, Confined Spaces, and special coatings systems. FDT personnel are trained in these tasks and receive certification through various accredited organizations.

Training Courses

New Hire Training:

- Hazardous Communication Program
- Fall Protection Program
- Scaffolding Safety
- Respiratory Program
- Lock Out / Tag Out Program
- Ladders Safety
- Confined Space Program
- Blood Borne Pathogens Program

Specialized Training: (see Chapter A-9 for training recertification requirements)

- Bonding & Grounding
- Elevated Work Platforms
- Isocyanate & Spray Painting
- Powder Actuated Tools
- Conflict Resolution
- First Aid/CPR
- Boom Lift
- Mobile Scaffold Safety
- Drug Awareness in the Work Place
- Lead Abatement Safety
- Confined Space Entry
- Back Care & Safety
- Fork Lift
- Swing Stage Scaffolds
- Asbestos Removal
- Spray Paint Equipment
- Ergonomics for Construction
- OSHA 10 Hour Certification

Annual Retraining Courses:

- Respiratory Awareness
- First Aid / CPR - Every 2 yrs
- Competent Lead Supervisor
- Lead Awareness

Supervisor Courses:

- Controlling the Field – Job Site Safety Inspection / Job Site Safety Set Up.
- F.D. Thomas Incident Packet "T.I.P." – Incident Investigation / Reporting
- Drugs Awareness – Reasonable Suspicion / Documentation
- Competent Lead Supervisor Person

Informational On-Site Bulletin Board Postings

- Federal Job Site Posting
- Emergency Job Site Information
- Assured Ground Color System
- State Job Site Postings
- OSHA 300 Log - Feb. 1 - April 31
- Safety Committee Minutes
- Dress/Behavior Posting

Safety Reporting & Meeting Minutes

- Weekly:
 - Toolbox Meetings
 - Site Reviews
- Monthly:
 - Safety Committee Memo
 - Site Craft Meetings
 - Pre-task Analysis
- Quarterly:
 - FDT Newsletter Employee

Compliance and Disciplinary Action

The FDT Illness and Injury Prevention Program requires that all employees follow company safety policies and operating procedures. When needed, employees will be provided with additional training and information to maintain their knowledge.

The discipline procedure of FD Thomas, Inc is intended to encourage employee compliance with the Illness and Injury Prevention Program.

Although FDT reserves the right to discharge "at will", employees found performing work in an unsafe manner that would endanger the employee or another employee may be subject to discipline or termination by management.

The jobsite superintendent will determine the course of action best suited to the circumstances. The steps to be taken, at a minimum, shall include the following:

- Step One - Verbal Warning – As the first step in correcting unacceptable behavior, the superintendent shall review the pertinent facts with the employee. The superintendent will consider the severity of the problem and the employee's past performance. A verbal warning may be issued to the employee. This warning and the name of the direct supervisor will be documented and placed in the employee's personnel file. If necessary, the employee will be placed on probation. Violations will be removed from the employee's record after a six-month period.
- Step Two - Written Warning – If the unacceptable behavior continues, the next step will be a written warning. The written warning will clearly state the safety policy that was violated and steps the employee must take to correct the behavior. Probation will be a part of the written warning. It may also include time off without pay. At the completion of the probationary period, the supervisor will meet with the employee to determine if the employee has achieved the required level of performance. This written warning, which will include the name of the direct supervisor, will be documented and placed in the employee's personnel file. Violations will be removed from the employee's record after a six-month period.
- Step Three - Termination – The employee may be terminated if he does not improve his behavior while on probation, or has violated another company safety policy within a twelve months period.

Note: *In cases where the safety violation is serious or life threatening in nature, the FDT Superintendent reserves the right to immediately terminate the employee without prior written warning.*