

Chapter 1 - Safety Policy and Procedures

Responsibility

The HSE Manager is the designated Company Safety Coordinator.

Policy

The Occupational Safety and Health Act of 1970 clearly defines the requirement to provide safe and healthful working conditions for all employees. Therefore, the safety and health of our employees is the first consideration in operating this business. Safety and health in our business must be part of every operation. Without question, it is every employee's responsibility at all levels.

It is the intent of WEM to comply with all laws. To do this, we must constantly be aware of conditions in all work areas that can produce injuries. No employees will be required to work at a job they know is not safe. Your cooperation in detecting hazards and, controlling them, is a condition of your employment. Inform your supervisor immediately of any situation beyond your ability or authority to correct.

The personal safety and health of each employee of WEM is of primary importance. Prevention of occupationally induced injuries and illnesses is of such consequence that it will be given precedence over operating productivity, whenever necessary. To the greatest degree possible, management will provide all mechanical and physical activities required for personal safety and health, in keeping with the highest standards.

We will maintain an occupational safety and health program conforming to the best practices of organizations of this type. To be successful, such a program must embody proper attitudes towards injury and illness prevention on the part of supervisors and employees. It also requires cooperation in all safety and health matters, not only between supervisor and employee, but also between each employee and their co-workers. Only through such a cooperative effort, can a safety and health program, in the best interest of all, be established and preserved.

Our objective 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 operations like ours. Our goal is to have zero accidents and injuries.

Our safety and health program includes:

- Providing mechanical and physical safeguards to the maximum extent possible
- Conducting a program of safety and health inspections to find and eliminate unsafe working conditions or practices, to control health hazards, and to fully comply with OSHA safety and health standards for every job
- Training all employees in good safety and health practices

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- Providing necessary personal protective equipment, and instructions for proper use and care Developing and enforcing safety and health rules, and requiring that employees cooperate with these rules as a condition of employment
- Investigating, promptly and thoroughly, every accident to find out what caused it, and correct the problem so it will not happen again

We recognize that responsibilities for occupational safety and health are shared:

- This employer accepts responsibility for leadership of the safety and health program, for its effectiveness and improvement, and for providing the safeguards required to ensure safe work conditions
- Supervisors are responsible for developing proper attitudes toward 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
- Employees are responsible for wholehearted, genuine operations of all aspects of the safety and health program including compliance with the rules and regulations and for continuously practicing safety and health procedures while performing their duties.

The HSE Manager will ensure that all employees are properly instructed and supervised in the safe operation of any machinery, tools, equipment, process, or practice that they are authorized to use or apply while at work.

Production is never so urgent that we cannot take the time to do our work safely.

Program Goals

Why have a workplace “Safety and Health Plan”? Taking risks is part of running a business, particularly for small business owners. You take risks in product development, marketing, and advertising to stay competitive. However, some risks should never be taken. One of these is risking the safety and health of workers. Safety begins at the top and goes downward throughout The Company. The primary goal of WEM is to continue operating a profitable business while protecting employees from injuries or illness. This can be achieved by delegating Responsibility and accountability to all involved in WEM’s operations.

Responsibility: Having to answer for activities and results

- Accountability: The actions taken by management to ensure the performance of responsibilities.

In other words, to reach our goal of a safe workplace, everyone needs to take responsibility and be held accountable.

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Benefits of achieving our goals are:

- Minimizing injuries and accidents
- Minimizing the loss of property and equipment
- Elimination of potential fatalities
- Elimination of potential permanent disabilities
- Reductions in Workers' Compensation costs
- Elimination of potential OSHA fines
- Reductions in operating costs
- Having the best "Safety and Health" conditions possible in the workplace

Management Commitment

WEM is committed to building an effective injury and illness prevention plan, putting it in writing, and integrating it into the entire operation.

The management of WEM is committed to this safety policy, and to provide direction and motivation by:

- Appointing Safety Coordinator(s) and / or Safety Committee Chairmen Establishing Company safety goals and objectives
- Establishing Company Safety goals and objectives
- Developing and implementing this written Safety and Health program
- Ensuring total commitment to the Safety and Health program
- Facilitating employees' safety training
- Establishing responsibilities for management and employees to follow
- Ensuring that management and employees are held accountable for the performance of their safety responsibilities
- Establishing and enforcing disciplinary procedures for employees
- Reviewing the Safety and Health program annually, and revising or updating as needed

Labor and Management Accountability

All employees, both labor and management, need to understand their responsibilities under OSHA rules and be held accountable for complying with the rules as well as the Company's related policies.

It is the responsibility of WEM to provide a safe and healthful work environment for their employees. However, holding everyone accountable for their part in workplace safety and health is critical for a successful injury and illness prevention plan.

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Assignment of Responsibility

The Safety Coordinator(s) and / or Safety Committee Members WEM has designated:

Safety Coordinator	Field Superintendent
Safety Coordinator	HSE Manager
Safety Committee Chair	Affected Program Forman
Safety Committee Vice-chairman	Forman
Safety Committee Alternate Chair / Vice-chair	Office Manager

The HSE Manager will assist managers in initiating, educating, and executing the safety program with:

- Introducing the safety program to new employees
- Following up on recommendations, suggestions, etc., made at safety meetings. All topics of safety concern must be documented accordingly
- Assisting the personnel in the execution of standard policies
- Conducting safety inspections on a periodic basis Addressing all hazards or potential hazards as needed
- Preparing monthly accident reports and investigations
- Maintaining adequate and available first aid supplies and safety equipment
- Ensuring an adequate number of qualified "First Aid Certified" people on the work site
- Becoming thoroughly familiar with OSHA regulations and local and state safety codes
- Defining the responsibilities for safety and health of all subordinates and holding each person accountable for their results through the formal appraisal system and where necessary, disciplinary procedures
- Emphasizing the unnecessary personal and financial losses of all accidents

Employee Involvement

Employees are required to work in compliance with the safety rules, report all accidents and near misses, and report all unsafe conditions or unsafe practices. To demonstrate WEM's commitment to support the employees in these responsibilities, WEM will do the following.

Communication System:

- Encourage employees to inform WEM about workplace hazards without fear of reprisal
- Information may be easily reviewed by employees
- Schedule general employee meetings where safety is freely and openly discussed by those present. These meetings will be regular, scheduled, and announced to all employees and managers to achieve maximum attendance. The purpose of these meetings is safety, and the concentration will be on:

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- Occupational accident and injury history at our work sites, with possible comparison to other locations within The Company
- Feedback from the Safety Committee
- Guest speakers concerned with workplace safety and health
- When possible, brief audio-visual materials that relate to our business Conduct training programs for communicating with employees
- Provide a safety suggestion box so that employees, anonymously if desired, can communicate their concerns with management
- Document all communication efforts to demonstrate that an effective communication system is in place

Hazard Identification and Control

Periodic inspections and procedures for correction provide methods of identifying existing or potential hazards in the workplace, and eliminating or controlling them. Hazard control is essential to an effective injury and illness plan. We will be sure to look at safe work practices and ensure that they are being followed, and that unsafe conditions or procedures are identified and corrected properly and promptly.

Employees are encouraged to report possible hazardous situations, knowing their reports will be given prompt and serious attention. Workplace equipment and personal protective equipment will be maintained in good, safe working conditions.

Hazards, where possible, will be corrected as soon as they are identified. For those that cannot be immediately corrected, a target date for correction will be set. WEM will provide interim protection for workers while hazards are being corrected. A written tracking system will be established to help monitor the progress of the hazard correction process.

Accident / Incident Investigation

Employers and safety committees are required to investigate or assign responsibility for investigating accidents. Trained individuals, with the primary focus of understanding why the accident or incident occurred, will investigate accidents / incidents and what actions can be taken to preclude recurrence. The focus will be on solutions and never on blame. They will be in writing, and adequately identify the causes of the accident or near miss occurrence.

Worker Training

Training is another essential element of any injury and illness prevention plan. OSHA rules require each employer to train workers for any job or task they are assigned.

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Our plan includes training and instruction:

- For all employees when they are first hired
- For all new employees for each specific task
- For all employees who are given new job assignments for which training has not already been received
- Whenever new substances, processes, procedures, or equipment are introduced into the workplace and present a new hazard
- Whenever new personal protective equipment or different work practices are used on existing hazards
- Whenever WEM is made aware of a new or previously unrecognized hazard
- For all supervisors to ensure they are familiar with the safety and health hazards to which employees under their immediate direction and control may be exposed

An effective safety and health plan requires proper job performance by everyone in the workplace.

It is the determination of WEM to ensure that all employees are knowledgeable about the materials and equipment with which they work, what known hazards are present, and how they are controlled.

Program Evaluation

Regular reviews will be held to look at the components of our safety and health plan, to determine what is working well and what changes, if any, are needed. All employees are encouraged to participate by keeping WEM informed of their concerns regarding the elements of this safety and health plan.

The success of this safety and health plan is dependent upon two things: First, WEM must provide a safe and healthful environment in which the employee can work safely, and second, the employee must choose to work safe.

Supervisor / Foreman

The Supervisors and / or Foremen will establish an operating atmosphere to ensure that safety and health is managed in the same manner and with the same emphasis as production, cost, and quality control. This will be accomplished by:

- Regularly emphasizing that accident and health hazard exposure prevention are not only moral responsibilities, but also a condition of employment
- Identifying operational oversights that could contribute to accidents which often result in injuries and property damage
- Participating in safety and health related activities, (e.g. safety meetings, facility reviews, and correcting dangerous employee behavior)

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- Explaining the safety policies and the hazards of work to be performed
- Ensuring that the initial orientation of "new hires" is properly carried out
- Making sure that if a "Competent Person" is required, that one is present to oversee and instruct employees when necessary
- Never short-cutting safety for expediency, nor allowing workers to do so
- Consistently enforce safety rules and enforce discipline
- Conducting daily job-site inspections and correcting noted safety violations

Employees

It is the duty of all employees to know the safety rules, and conduct their work in compliance with these rules. Disregard of the safety and health rules shall be grounds for disciplinary action up to and including termination. It is also the duty of each employee to make full use of the safeguards provided for their protection. Every employee will receive an orientation when hired and receive a copy of any Company Safety and Health Programs. Employee responsibilities include the following:

- Reading, understanding and following safety and health rules and procedures
- Signing the Code of Safe Practices and any other policy acknowledgements
- Always Wearing Personal Protective Equipment (PPE) when working in areas where there is a possible danger of injury
- Wearing suitable work clothes as determined by the supervisor / foreman Performing all tasks safely as directed by their supervisor / foreman
- Reporting ALL injuries, no matter how slight, to their supervisor / foreman immediately and seeking treatment promptly
- Knowing the location of first aid, firefighting equipment, and safety devices
- Attending all required safety and health meetings
- Not performing potentially hazardous tasks, or using any hazardous material until properly trained, and following all safety procedures for those tasks
- Stop and ask questions when unsure about how to safely do the work

WEM HSE

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Training Record

Trainer	
Signature	
Date	

Content of Training

Attendees (please print)
