

## **RESPONSIBILITIES**

David Slim is the designated Company safety coordinator.

## **POLICY**

The Occupational Safety and Health (OSH) 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 will be part of every operation. Without question, it is every employee's responsibility at all levels.

It is the intent of Hawk Energy, LLC to comply with all laws. To do this, we will 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 or healthful. Your cooperation in detecting hazards and, in turn, 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 Hawk Energy, LLC 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 will 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-employees. 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 zero (0) 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 Occupational Safety and Health Administration (OSHA) safety and health standards for every job.
- Training all employees in good safety and health practices.
- Providing necessary personal protective equipment (PPE), 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 employee 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 while performing their duties.

David Slim 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 will never be taken. One (1) of these is risking the safety and health of employees. Safety begins at the top and goes downward throughout the Company. The primary goal of Hawk Energy, LLC 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 Hawk Energy, LLC’s operation.

- 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.

## **Benefits of Achieving our Goals Are:**

- Minimizing of injuries and accidents
- Minimizing the loss of property and equipment
- Elimination of potential fatalities
- Elimination of potential permanent disabilities
- Elimination of potential OSHA fines
- Reductions in employees compensation costs
- Reductions in operating costs
- Having the best “safety and health” conditions possible in the workplace

## **Management Commitment**

Hawk Energy, LLC 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 Hawk Energy, LLC is committed 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
- 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 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 Hawk Energy, LLC 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.

## Assignment of Responsibility

The safety coordinator(s) and/or safety committee members Hawk Energy, LLC has designated:

Safety Coordinator	Hawk Energy, LLC
Safety Coordinator	
Safety Committee Chair	
Safety Committee Vice-chairman	
Safety Committee Alternate Chair/Vice-chair	

Their cell phone and office phone numbers are:

Safety Person's Name	Office Phone #	Cell Phone #

David Slim 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 the "weekly" safety meetings. All topics of safety concerns will be documented accordingly.
- Assisting the employee 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 Hawk Energy, LLC's commitment to support the employees in these responsibilities, Hawk Energy, LLC will do the following:

## Communication System

- Encourage employees to inform Hawk Energy, LLC about workplace hazards without fear of reprisal.
- Establish and maintain a centrally located "safety bulletin board" where current, relevant 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:
  - 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 PPE will be maintained in good, safe working condition.

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. Hawk Energy, LLC 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.

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 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 PPE or different work practices are used on existing hazards
- Whenever Hawk Energy, LLC 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 require proper job performance by everyone in the workplace.

Hawk Energy, LLC will 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 Hawk Energy, LLC 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 (2) things: First, Hawk Energy, LLC will provide a safe and healthful environment in which the employee can work safe, and second, the employee will 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 will 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).
- Explaining the safety policies and the hazards of each person's particular work.
- Ensuring that initial orientation of "new hires" is properly carried out.
- Making sure that if a "competent person" is required, that one (1) 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 will 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.
- Wearing PPE at all times 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.

## **MEDICAL FACILITIES**

Each worksite will identify and contact an appropriate hospital or clinic to ensure they can handle possible emergencies and injuries in a timely manner. The location and contact information for the medical facility will be provided to all employees and posted at the worksite in a place all employees gather.

## **POSTING REQUIREMENTS**

All federal, state, and local posting requirements will be posted at the worksite in a place all employees gather. Particularly the OSHA job safety and health poster, state labor law postings, required insurance postings, and emergency contact numbers.

## **HEALTH, SAFETY, AND ENVIRONMENT (HSE) SUPERVISOR**

At least one (1) supervisor will be always at the worksite who is designated the HSE supervisor. This person will have at least appropriate OSHA ten (10) hour outreach training and meet the definition of OSHA for competent or qualified person for the task at hand.

## **EVALUATING SAFETY PROGRAM PERFORMANCE**

The effectiveness of this safety plan will be evaluated at least annually using leading and lagging indicators compared year after year to measure the effectiveness of the safety policy and established safe work procedures.

Lagging indicators compared will include the experience modification rate (EMR) and other recorded injuries and incidents such as Total Recordable Incident Rate (TRIR), Days Away, Restricted or Transferred (DART) and fatalities.

Leading indicators compared include documented near miss investigations, employee training records, recorded hazardous conditions investigations, safe work permits (e.g. confined spaces, hot work), and maintenance checklists.

The safety professional will complete an annual report of these safety program performance metric measurements with suggested changes to the safety policy and safe work procedures.



## **CODE OF CONDUCT**

All Hawk Energy, LLC employees will abide by our company code of conduct when performing any company business activities. Hawk Energy, LLC will further ensure that company employees adhere to all client requirements and safe practices when performing work at the client site.

Hawk Energy, LLC employees will not:

- Engage in any unlawful or unethical activities
- Divulge any company or client confidential or proprietary information to unauthorized employee
- Use or tolerate the use of drugs or alcohol at the workplace
- Engage in any actions that constitute sexual harassment or workplace violence

### **Prevention**

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.

### **Reporting Violations**

Employees will be required to report any safety, health, or ethical violations to the company as soon as possible.

The company will establish a method that allows employees to report any code of conduct violations anonymously and without fear of reprisal.

### **Communication**

This code of conduct will be communicated to all employees at their times of hire, and will be reviewed at least annually, or when any changes are made.

### **Disciplinary Actions**

The company will investigate all reports of violations, and any employees found to have violated our code of conduct will be subject to progressive disciplinary action according to our disciplinary policy, up to and including termination.

Any violations of our code of conduct deemed to illegal or unlawful will be reported to the appropriate authorities.

### **Commitment**

The goal of Hawk Energy, LLC is to operate a profitable business with the highest possible standards of integrity. This can be achieved by ensuring that all employees abide by our code of conduct. We are committed to operating in a professional and courteous manner in all our business practices.

**Owner Name**

**Owner Signature**

**Date**

Training Record

Trainer:	
Signature:	
Date:	
Content of Training:	
Attendees	
Print Name:	Signature:

