
Injury & Illness Prevention

Standard Operating Procedure Manual

MANAGEMENT POLICY STATEMENT

September 19th, 2016

Populus Group believes that employee safety is important in the planning and operation of all office and field activities. Safety is essential to welfare, morale, and employee relations. With this in mind, we have established a comprehensive Employee Safety Program within all departments at all levels of activity.

Populus Group is absolutely committed to the safety of all its employees, including both employees for whom Populus Group exercises direct supervision, as well as employees who are directly supervised by the client to whom they are temporarily assigned. Populus Group, however, is unable to directly supervise or control the working environments established by its clients. As a result, the client, as written in Populus Group standard services agreement, must exercise primary responsibility for evaluating, correcting unsafe working conditions, providing required IIPP Program coverage, PPE and training to keep training current.

Realizing that accident prevention requires a continued effort, and the participation of all employees, it is the firm policy of Populus Group that no part of our job is so important that we cannot take time to do it safely. Therefore, it is imperative that workplace hazards be identified, appropriately evaluated, and effectively controlled.

As the Program Administrator, the person responsible for implementing and managing this program, I can be contacted at any time for your assistance. Your complete cooperation is needed and is very much appreciated.

For simplicity, the term "employee" as used throughout this document, is to represent both internal and contract employees unless otherwise specified.

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Health and Safety

Compliance Specialist

Populus Group

INJURY AND ILLNESS PREVENTION PROGRAM

I. ASSIGNMENT OF RESPONSIBILITY FOR PROGRAM

- A. While Corporate Management has the ultimate responsibility for prevention of accidents, the specific responsibility and authority for implementing all parts of the following Employee Safety Program rests with each member of the management and labor team.
- B. Therefore, as a matter of policy, Corporate Management will:
1. Maintain an active, progressive Employee Safety Program in which all members of management will participate in order to promote safety awareness and safe work practices.
 2. Provide, within reason, a safe and secure work environment in which identified occupational hazards are controlled when elimination is not feasible.
 3. Require that all employees follow established safety rules and work practices of Populus Group and our clients.
 4. Provide adequate budget approvals for the achievement of all approved Employee Safety objectives.
 5. Actively support the Employee Safety Program as an example to subordinates, and with the decisions and directives that are required.
 6. Delegate authority to others under his/her supervision to expedite and facilitate application of the Employee Safety Program.
 7. Educate and train employees regarding elements of this program and on any issues involving worker safety and health.
 8. Investigate reported accidents. Determine cause of the accident and implement corrective actions that will, in a timely manner, prevent recurrence.
- C. Directors of Branch Operations, Customer Service Supervisors, and Account Representatives will:
1. Assist Corporate Management in educating and training employees regarding the elements of this program and on any issues involving worker safety and health.
 2. Institute work practices and ethics, which reflect the safest and most efficient methods available for accomplishing, assigned tasks.
 3. Be responsible for actively supporting the Employee Safety Program.
 4. Impart to each employee that a violation of established safety rules WILL NOT be tolerated.
 5. Take prompt corrective action whenever unsafe acts or unsafe conditions are observed or reported by employees.
 6. Provide the needed safety equipment or other protective devices as required.
 7. Conduct safety inspections in accordance with policy doctrine.
 8. Instill positive safety awareness in each employee through personal contacts.

9. Ensure that accidents are investigated and reported. Assist Corporate Management in determining the cause of the accident and implement corrective actions that will, in a timely manner, prevent recurrence.

D. Employees will:

1. Be expected to review the Employee Safety Program, read and follow all Populus Group and client safety rules.
2. Support and participate in the Employee Safety Program.
3. Report workplace hazards and make suggestions for control and/or elimination.
4. Conduct themselves in a way that enhances their personal safety and that of their fellow workers.
5. Work according to good safety practices as instructed, discussed, or posted by supervision.
6. Request and properly use the appropriate personal protective equipment for the assigned task.
7. Report ALL injuries, illnesses, and accidents on the day of occurrence, even if they appear minor.
8. Attend all client orientation and safety meetings and take an active part in the discussions.
9. Not start any work under conditions believed to be unsafe without first calling these conditions to the attention of the supervisor in charge.
10. Immediately report back to the local Populus Group office if asked to do anything outside of the position or work function they've been originally placed to perform.

II. COMPLIANCE WITH THE INJURY & ILLNESS PREVENTION PROGRAM (IIPP)

- A. All personnel are expected to comply fully with the Employee Safety Program. Any failure to do so will result in appropriate disciplinary action, including but not limited to, employment termination.

Additional mandatory training may be part of any discipline imposed. All disciplinary action will be consistent with fair and just treatment of each individual employee. Any disciplined employee, who feels he or she has not been fairly treated, should follow the established procedures in resolving this problem.

The Employee Safety Program should not be viewed as an exclusive list to situations not specifically mentioned. Management reserves the right at all times, when circumstances warrant it, to publish new rules, or modify existing ones, in order to ensure a safe, healthy and productive work environment for all employees.

III. SAFETY AND HEALTH TRAINING

- A. Populus Group is committed to instructing all employees and other workers it controls or directs and directly supervises in safe and healthful work practices. To achieve this goal, Populus Group will provide the following training to each employee with regard to general safety procedures and with regard to any hazards or safety procedures specific to that employee's work assignment.
1. All current employees will receive initial training upon establishment of the Employee Safety Program.
 2. New employees will receive initial training upon being hired by Populus Group.
 3. Employees will receive training when assigned to a new task for which training has not yet been received.
 4. Employees will be trained whenever new substances, processes, procedures or equipment, which represent a new hazard, are introduced into the workplace or whenever Populus Group is made aware of a new or previously unrecognized hazard.
 5. All Contract Employees will receive training when and to the extent that the Contract Employees are exposed to work-site and job assignment specific hazards. This training will be provided by the appropriate Populus Group client.
 6. Supervisors and managers shall be trained on hazards and safe practices in their areas of responsibility.
 7. Refresher training shall be provided at certain times as determined by the Corporate Safety Director.
 8. All training shall be documented in employee files.

IV. COMMUNICATING SAFETY & HEALTH MATTERS

- A. Populus Group will hold formal safety meetings on a periodic basis and at any other time deemed necessary by the Safety Director. The safety committee shall consist of the Safety Director, Regional Safety Managers, Risk Manager, and Controller as permanent members.
- B. At each meeting, the safety committee shall:
1. Review significant accident/illnesses reports and submit suggestions for prevention
 2. Review findings from informal site inspections carried out on clients' facilities and projects.
 3. Discuss regulatory and company policy updates.
 4. Review employee suggestions.
- C. The form of the minutes of each meeting should indicate members in attendance and a synopsis of the items listed above. Meeting minutes will be kept on file for at least three years at the Corporate Health & Safety Office and will be made available to any employee upon request.
- D. Safety Recognition. This program recognizes individuals for positive safety performance. This program provides for quarterly and annual events.

- E. Employee Suggestions. Employees can report all safety suggestions through the safety hotline that is provided to all employees. All employee health and safety hazards should be reports to the safety hotline with fear of reprisal.

V. SAFETY INSPECTIONS

- A. As part of our overall safety program, we will conduct and document periodic inspections of our workplaces and our clients' facilities and projects as a method of identifying existing or potential hazards in the workplace. Although we relinquish operational control and supervisor responsibility to our clients, our responsibility for providing a safe workplace remains. The following guidelines have been established as our site inspection protocol.
 - 1. Inspection Responsibility - An Account Manager designated representative will be responsible for conducting client site surveys to identify and evaluate workplace hazards. Inspections at clients' facilities do not take the place of, nor release the client from any inherit responsibility that they have in maintaining a safe workplace. They are intended to be done in full cooperation and participation with the respective client.
 - 2. Inspection Frequency
 - a. Periodic Site Surveys of client facilities will be conducted every twelve months. The Corporate Health & Safety Director shall determine the appropriate inspection form for each type of inspection to be carried out.
 - b. Incident / Accident Follow-up - Inspections will be carried out upon receipt of a report of an unsafe or unhealthy act or condition from a Populus Group employee, or from a site manager or safety and health officer. Inspections will also be conducted in response to reportable employee injuries or illnesses as deemed appropriate by Populus Group Health & Safety Department. Inspections carried out under this section may take the place of scheduled inspections described in section 2(a). For further information regarding Injury reporting contact the Workers' Compensation Department.
 - c. Changing Conditions - Inspections shall be conducted upon report of significant changes in site conditions to ensure that assigned employees possess the necessary skills and training to complete their tasks and to ensure that additional hazard communication training has been conducted.
 - 3. Inspection Procedures - Inspections shall be conducted either by site inspection or communication with the site manager and affected employees, dependent on the circumstances surrounding the need for inspection.
 - 4. Employee Responsibility - Populus Group employees are required to report unsafe or unhealthy conditions, work practices, work procedures or accidents immediately to the site manager. If the incident involves a potentially hazardous condition that may result in injury or death, the affected Populus Group employees shall cease work immediately until the issue has been resolved. If the issue cannot be resolved on site, a report shall be made as soon as possible to the Populus Group contracting office.

5. Immediately report back to the local Populus Group office if asked to do anything outside of the position or work function they've been originally placed to perform.
6. Employees reporting workplace hazards or unsafe conditions shall not be disciplined or discharged for such reports and will be protected from retaliation. Employees may, if they so desire, report unsafe conditions or hazards by submitting reports to the Program Administrator without identifying themselves.
7. Contracting Office Responsibility - All offices shall consult with the Corporate Health and Safety Office for guidance in all issues involving Contract Employee safety. Written or verbal reports shall be made on all incidents and copies kept on file at the corporate office.

VI. HAZARD CORRECTION

- A. Unsafe or unhealthy work conditions, practices or procedures shall be corrected in a timely manner based on severity of the hazards. Hazards shall be corrected according to the following procedures.
 1. When observed or discovered;
 2. When an imminent hazard exists which cannot be immediately abated without endangering employees and or property, Populus Group will remove all exposed workers from the area except those necessary to correct the existing condition. Workers necessary to correct the hazardous condition shall be provided with the necessary protection.

VII. ACCIDENT INVESTIGATIONS

- A. All injuries that result in the loss of life, employee hospitalization for more than observation, amputation, or a loss of an eye will be investigated and all other injuries when requested by management. The following procedures will be utilized:
 1. Interview injured employees and any witnesses.
 2. Review the area in which injury occurred.
 3. Along with client determine root cause of the incident and corrective action required.
 4. Obtain a copy of client's investigation and copies of photos if any were taken.
 5. Document investigation finding and provide to management.
 6. Report the incident to the nearest OSHA District Office.

All employers involved (primary and secondary) must call into the district office, unless one that calls in specifically states that they are calling in for an additional employer. All calls must be made within 8 hours of a serious injury. An injury becomes serious if a patient received 24 hours on non-observation hospitalization (this includes time medicated) or if it could cause permanent disfigurement or damage such as an amputation or broken bone.

VIII. APPLICATION TO CONTRACT EMPLOYEES

- A. Populus Group is absolutely committed to the safety of all its employees including both employees for whom Populus Group exercises direct supervision and employees who are directly supervised by the clients to whom they are temporarily assigned. Populus Group however, is unable to directly supervise or control

the working environments established by its clients. As a result, the client, as written in Populus Group standard services agreement, must exercise primary responsibility for evaluating, correcting unsafe working conditions, providing required IIPP Program coverage, PPE and training to keep training current, Populus Group will:

1. Inform the Contract Employee that the primary responsibility for evaluating and correcting unsafe work-site conditions, and for conducting training specific to potential work-site hazards, resides with the client who exercises direct supervision and control. The client is required to have its own health and safety programs which cover all personnel whom it supervises.
2. Confirm that the client maintains its own health and safety programs as required by law, and that the Contract Employee will be provided with a copy of this document before beginning his or her first work assignment.
3. Provide the Contract Employee with training information on general safety procedures and guidelines for identification of potentially unsafe working conditions.
4. Inform the Contract Employee that he or she should communicate any health or safety concerns to the client pursuant to the communications procedures set forth in the client's written safety programs. If the condition is not corrected or the communication procedure provided by the client is otherwise inadequate, the Contract Employee is informed to report his or her concern to Populus Group Health & Safety Department by calling 248-712-8016. The contract employee should immediately report back to their local Populus Group office if asked to do anything outside of the position or work function they've been originally placed to perform.
5. Notify the client of any potential safety violations reported by Contract Employees. Where appropriate, Populus Group will inspect the client's work-site and/or survey personnel assigned to the work-site, to confirm compliance with appropriate safety procedures. Such inspections and/or surveys will be conducted in response to complaints by Contract Employees, or where there is otherwise reason to believe that the client is not following safety procedures. If the client unreasonably refuses to correct safety violations of which it has been notified, and the safety violations affect the work-site to which Populus Group personnel are assigned, Populus Group will remove the effected personnel from the potentially unsafe work-sites.

IX. CODE OF SAFE WORK PRACTICES

- A. The purpose of the Code of Safe Work Practices is to thoroughly acquaint each employee with a set of safe working rules and procedures that will help to preserve health and welfare. It is well understood that everyone benefits from a good Safety Program.

No safety manual, however complete, can cover all conditions that might arise; therefore, it is necessary to use good judgment along with the observance of established safe work practices. It is the desire of this

company to establish the safest working conditions for both internal and Contract Employees, by using the safest protective devices and equipment available, and to promote a good housekeeping program. It is necessary to have all employees' cooperation in order to promote a good Safety Program. If an employee does not completely understand all of the job procedures and safety rules, a company supervisor or client representative should explain them fully prior to starting work. Although it is management's responsibility to provide a safe working environment, it is ultimately the employee's responsibility to work according to established procedures.

- B. General Safety Rules / Code of Conduct - Populus Group has developed these safety rules after the Federal OSHA requirements. It is each employee's responsibility to read and understand these rules, and any other safety rules unique to your job as specified by our client. The client has the primary responsibility for maintaining the safety and health of the working environment of all those employees over which the customer exercises direction, control or direct supervision. Contract Employees must read and be familiar with the written safety programs of the client. If the client does not have such a plan in place, Populus Group shall be notified immediately.
1. Report any injury or illness to your supervisor immediately. Refer to the Workers' Compensation Program for further details.
 2. Report any observed unsafe condition to your supervisor.
 3. Horseplay is prohibited at all times.
 4. The drinking of alcoholic beverages is not permitted on the job. See the Drug and Alcohol Policy for further information.
 5. The possession of an offensive/defensive weapon on company or client property is strictly prohibited.
 6. If you do not have current first aid training (Red Cross or American Heart Assoc.), do not move or treat an injured person unless there is an immediate peril, such as profuse bleeding or stoppage of breathing.
 7. Appropriate clothing and footwear must be worn on the job at all times.
 8. You shall not perform any task unless you are trained to do so and are aware of the hazards associated with the task.
 9. You may be assigned certain personal protective safety equipment. This equipment is to be available for use on the job and be maintained in accordance with manufacturer.
 10. Learn safe work practices. When in doubt about performing a task safely, contact your supervisor for instruction and training.
 11. Learn where fire extinguishers and first aid kits are located.
 12. Obey all traffic regulations when operating vehicles on public highways.
 13. When operating or riding in company vehicles or using your personal vehicle for business purposes, the vehicle's seat belt shall be worn.
 14. Maintain a general condition of good housekeeping in all work areas at all times.
 15. Be alert to all hazards that could affect you and your fellow employees.
 16. Obey all safety signs and tags.

17. Always perform your assigned tasks in a safe and proper manner; do not take shortcuts. The taking of shortcuts and the ignoring of established safety rules is a leading cause of employee injury.
 18. Workers shall not handle or tamper with any electrical equipment, machinery, air or water lines, or other potentially hazardous devices in a manner not within the scope of their duties, unless they have received specific instructions from their supervisor.
 19. All cords running into walking areas must be taped down or inserted through rubber protectors to prevent tripping hazards.
 20. Plug all electrical equipment into appropriate wall receptacles, or into an extension of only one cord of similar size and capacity. Three-pronged plugs should be used to ensure continuity of ground.
 21. Keep appliances such as coffeepots or microwave ovens in working order and inspect them for signs of wear, HIPP
 22. or frayed cords.
 23. Keep any individual heaters in work areas clear of combustible materials such as drapes or waste from wastebaskets. Use only newer heaters that are equipped with tip- over switches.
 24. Use equipment such as scissors or staplers for their intended purposes only, and do not misuse them as hammers, pry-bars or screwdrivers. Misuse can cause damage to the equipment and possible injury to the user.
 25. Store files and supplies in a manner that prevents damage to supplies or injury to personnel when they are moved. Store heaviest items closest to the floor and lightweight items above.
 26. Never stack materials precariously on top of lockers, file cabinets or other high places
 27. Store cleaning supplies away from edible items on kitchen shelves.
 28. Store cleaning solvents and flammable liquids only in approved containers.
 29. Keep solutions that may be poisonous or are not intended for consumption in well labeled containers.
 30. Wipe all spills promptly. Keep all stairways clear of items that can be tripped over.
- C. Physical Condition - The following physical conditions must be reported immediately upon receiving either a verbal or written report from a medical doctor.
1. Defective eyesight.
 2. Defective hearing.
 3. Muscular weakness.
 4. Either high or low blood pressure.
 5. Heart disease and/or other problems.
 6. Any other condition that might affect your safe work performance.
 7. All accidents, whether resulting in injuries or not, all sickness or other ailments no matter how slight they may seem, which are in any way attributable to or connected with employment, must be reported to your supervisor.
- D. Emergency Preparedness / Evacuation - To respond effectively to workplace emergencies it is important that each office be prepared.

1. Emergency phone numbers shall be posted for medical emergency, fire, police, and ambulance services.
2. Periodic emergency drills shall be held so that employees will know how to respond to various emergencies. Offices should check with their respective building management firm to determine responsibility for fire and evacuation drills.
3. Keep aisles clear at all times. Means of egress shall be kept un-blocked, well lighted and unlocked during working hours.
4. Exit doors must be properly marked and comply with fire safety regulations during business hours.

E. Fire Prevention and Protection - Do Not Attempt to fight a fire, unless you've received previous training.

All offices should ensure that their facilities meet the guidelines established below. Offices that are operating in leased facilities should check with their respective property management firms for compliance support.

1. Each location shall have an adequate compliment of UL approved portable fire extinguishers. Extinguishers should be of the A:B:C type.
2. The minimum rating of portable fire extinguishers should not be less than 2A:2BC. At least one extinguisher should be provided for every building and every floor such that the maximum distance to another extinguisher is no more than 75 feet and there is at least one extinguisher provided for every 3,000 square feet of floor area.
3. Portable extinguishers should be located such that they are mounted and visible.
4. All portable fire extinguishers shall be inspected annually. An inspection tag shall be attached to each extinguisher that indicates the inspection date. In addition, each extinguisher should be inspected monthly to make certain that it is at its assigned location and that it is fully charged.
5. Employees should not use portable extinguishers, unless they've received prior specific training in the different types of fires, different types of extinguishers, and the proper use of the extinguisher in putting out a fire.
6. Employees are to obey all No Smoking signs.
7. Use only approved containers for the storage of flammable liquids.

F. Sign Posting - A number of safety-related signs are required to be posted by OSHA and other regulatory agencies. Included in the list are the following.

1. A listing of all emergency phone numbers must be posted near a telephone. It must contain phone numbers for a local doctor, fire department, police station, ambulance, and hospital.
2. An OSHA safety poster must be posted. These posters can be obtained by contacting the Health and Safety Department.
3. At least one United States Department of Labor Equal Employment Opportunity Poster must be posted in a conspicuous location.
4. All posters and notices governing state workers compensation and labor laws must also be posted in a conspicuous location.

G. Work Station Ergonomics - Office work stations shall be ergonomically designed to accommodate the full range of required movements among workers. Moreover, they should be designed to accommodate the

workers who are actually using them to perform the job. Employees should inspect their work stations to insure that the following conditions have been met.

1. The work station should be designed to permit the worker to adapt to several different but equally healthful and safe postures that still permit performance of the job. Sufficient space should be provided for the knees and feet.
 2. Work tables and chairs should be height adjustable to provide proper back and leg support. Seat cushions can be used to compensate for height variations when chairs or stools are not adjustable.
 3. Work stations that include video display terminals (VDT) should be ergonomically designed for both computer and non-computer work.
 4. VDT work stations should be equipped with adjustable and detachable keyboards, display screens that tilt up and down, brightness and contrast controls, and flexible copy-holders that reduce the distance between the screen and source material.
 5. Proper lighting and anti-glare filters should be installed to prevent glare from the VDT screen.
 6. VDT operators should be provided with chairs that have armrests to support the wrists and forearms during prolonged keying and that do not interfere with adjusting the chair or moving it close to the desk or work surface. The chair should also accommodate the height and contour of the body.
 7. Computer components such as the monitor, keyboard, and work surfaces should be positioned at comfortable heights so as to prevent pain and stiffness in the neck, arms, back, shoulder, wrists, and hands.
- H. Safe Lifting Techniques - Improper lifting techniques are the single most cause of back pain and injuries in the workplace. Other contributing factors include poor posture, poor physical condition, and stress. But regardless of your physical and mental condition, following the simple lifting and handling guidelines below can reduce the strain on your back and greatly reduce the chance of back injury.
1. Before lifting any object, you should first determine if mechanical lifting devices are available to assist you in accomplishing the task. Mechanical devices include forklifts, dollies, and hoists. If these devices are unavailable, then other options such as splitting the load into smaller ones or finding someone to share the load should be considered.
 2. Size up the load: Lift the object by one corner. If the load is too heavy or awkward, get someone to help or find a mechanical device.
 3. Bend at the knees: This is the single most important step when lifting an object, no matter what the weight is. Place your feet close to the object, center yourself over the load, and then bend your knees and obtain a good hold on the object. Lift straight up and smoothly, trying not to "jerk-up" the object.
 4. Do not twist or turn your body when lifting: Always keep the load close to your body and keep it steady. Any sudden twisting or jerking can easily cause you to "throw out your back".
 5. Ensure your path is clear: It is often difficult to see clearly in front of you when carrying an object. Be sure to check your intended path for obstructions and footing or find someone to assist you.

6. Set the load down properly: Lower the load slowly by bending your knees and letting your legs do the do the work.
 7. Push, not pull: When moving an object without lifting, push rather than pull. This transfers most of the work to the legs.
 8. Catching: When catching a thrown or falling object ensure that your legs are firmly planted, with your back straight and your knees slightly bent. Your legs should absorb the impact.
- I. Heat Illness Prevention - Heat illness may result from a combination of factors, to include environmental temperature, humidity, direct radiant heat from the sun or other sources such as, air speed, and workload. Personal factors, such as age, weight, level of fitness, medical condition, use of medications and alcohol, and acclimatization affect how well the body deals with excess heat.

Heat related illness usually comes in stages. The signal of the first stage is heat cramps in muscles. If you recognize a person who has heat cramps, have him or her stop activity and rest. If the person is fully awake and alert, have him or her drink small amounts of cool water or a commercial sports drink. Gently stretch the cramped muscle and hold the stretch for about 20 seconds, then gently massage the muscle. Repeat these steps if necessary.

The second more serious stage of heat related illness called heat exhaustion symptoms include;

- » Cool, moist, pale skin (skin may be red after physical activity).
- » Headache.
- » Dizziness and weakness or exhaustion.
- » Nausea.
- » The skin may or may not feel hot.

Get the person to a cooler place, have him or her rest. If fully awake give a glass of cool water every 15 minutes. Do not let them drink too quickly. Remove or loosen tight clothing and apply cool, wet cloths such as towels or wet sheets. 9-1-1 or the local emergency number shall be called if the person experiencing heat exhaustion symptoms refuses water, vomits or loses consciousness.

The signals of the late stage of heat related illness called heat stroke symptoms include;

- » Vomiting
- » Decreased alertness level or complete loss of consciousness
- » High body temperature
- » Skin may still be moist or the victim may stop sweating and the skin may be red, hot and dry
- » Rapid, weak pulse
- » Rapid, shallow breathing

Heat stroke is a life threatening situation! In the event of heat stroke 9-1-1 or your local EMS number shall be called. Move the person to a cooler place. Quickly cool the body. Wrap wet sheets around the body and fan it. If you have ice packs or cold packs, wrap them in a cloth and place them on the victim's wrists and ankles, in the armpits and on the neck to cool the large blood vessels. Watch for signals of breathing problems and make sure the airway is clear. Keep the person lying down.

It is Populus Group's policy that every employee should work under the safest conditions possible. Therefore, every reasonable effort will be made to prevent heat related illnesses.

We believe that many heat related illnesses can be prevented by taking common sense precautions. If each one of us does our part, including acting and talking with safety in mind, heat related illnesses and safety on the job can be achieved.

Populus Group employees shall follow the guidelines provided by the client to minimize and prevent heat related illnesses. We are absolutely committed to the safety of all our employees. Populus Group however, is unable to directly supervise or control the working environments established by its clients. As a result, the clients, as required by law, must exercise primary responsibility for evaluating and correcting unsafe working conditions. Populus Group and the Account Managers will take the following steps to ensure our contract employees are covered by an effective Heat Illness Prevention Program:

- » Make explicit arrangements in writing (Populus Group Services Agreement) with client to provide all required IIPP program coverage, PPE, and training, and to keep training current.
- » Review clients IIPP and Heat Illness Prevention Program and confirm all required training has been completed and documented.
- » Conduct periodic monitoring (at a minimum of every twelve months) of the client sites by conducting a site survey.
- » Ensure contract employees receive the Populus Group Contract Employee Safety Handbook and signs Verification of Instruction.

Furthermore, for those employees that Populus Group supervises on a day to day basis, Populus Group will ensure:

1. 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 shift.
2. Employees shall have access to shade. At or below 85 degrees Fahrenheit the employee shall have timely access to shade upon request. For temperatures at or above 85 degrees Fahrenheit one or more areas with shade shall be provided at all times while employees are present. Shade shall accommodate at least 25% of employees currently at work at any given time.
3. High-Heat Procedures to be followed by supervisors shall include, but is not limited to:
4. Effective communication by voice, observation or electronic means
5. Observation of employees for alertness and signs/symptoms of heat related illness
6. Reminding employees to drink water throughout their shift
7. Closely supervise new employees during their first 14 days of employment
- a. Emergency Responder notification if onset of Heat Related Illness Call 9-1-1, maintain contact, direct responders to worksite, and follow their directions

CHEMICAL HANDLING AND HAZARD COMMUNICATION

As of December 1st 2013, OSHA is revising its Hazard Communication Standard to align with the United Nations' Globally Harmonized System (GHS) of Classification and Labeling of chemicals. Two significant changes contained in the revised standard require the use of new labeling elements and a standardized format for Safety Data Sheets (SDS's), formerly known as Material Safety Data Sheets (MSDS's). The new label elements and the SDS requirements are meant to improve worker understanding of the hazards associated with the use of chemicals in their workplaces. The following list contains the minimum required topics for the training:

1. Training on label elements including information on:
 - a. Product Identifier
 - b. Signal Word
 - c. Pictogram
 - d. Hazard Statement(s)
 - e. Precautionary Statement(s)
 - f. Name, Address, and Phone number of the manufacturer, distributor or importer
2. Training on the format of the SDS, including information on:
 - a. Standardized 16 section format, including type of information found in each section
 - b. How the information on the label is related to the SDS

Employee Acknowledgment Form

I acknowledge the receipt of the Injury & Illness Prevention Program guide. I understand that these policies are a guide and that no document can anticipate every circumstance or question about a policy. I have received a copy of the guide and I understand that it is my responsibility to read and comply with the policies contained in the document and any revisions made.

Employee's Signature: _____

Employee's Name: _____

Date: _____