GDI CORPORATE SAFETY POLICY

The safety program at GDI is captured in a series of safety procedures (SPs) based on specific safety protocols. This document outlines those procedures with key reference points to specific SPs.

1. **Master Policy – GDI & Vendor Compliance**
   1. Regulatory compliance
   2. Training
      1. Pre-hire
      2. Site safety
      3. Safety Auditing
         1. Weekly observational
         2. Annual audits
      4. Annual Required Training
         1. SDS (SP-05)
         2. Hazard Communication (SP-05)
         3. Bloodborne Pathogen (SP11)
         4. Building Safety
         5. GDI Safety Policy (SP-02)
      5. Documentation
         1. Sign off sheets
         2. Website input
   3. Safety Representatives
      1. Corporate: VP of Safety
      2. Regional: Safety Managers
      3. Operations: site/regional safety teams
   4. Subcontractor Qualifications
      1. Proof of Insurance
      2. Safety program review
      3. Statistics
         1. EMR – less than 1.00
         2. TRIR
         3. DART
   5. Reporting & Investigations
      1. Incident form (F300-0016)
      2. Near Miss form (F300-0085)
      3. Investigations
      4. Drivers Report of Accident (F300-0032)
   6. Medical Care
      1. Refusals
      2. First aid
      3. Emergency Care
      4. Clinical Care
      5. OSHA Required Reporting
      6. Modified Work
      7. HIPAA
   7. Chemical Safety
      1. Storage
      2. Handling
      3. Training
      4. Non-Conformances
      5. Hazardous Declaration
   8. Personal Protective Equipment (PPE)
      1. Also see SP-02: section 5.5
   9. Weapons – Work Place Violence
   10. Temporary Labor
2. **Power Industrial Truck SP-01**
   1. Operator selection and criteria
   2. MVR checks
   3. Hiring & Retention standards
      1. New Driver training
      2. Safe driving expectations (F300-0028)
   4. Safety expectations
      1. Cargo handling
      2. Driver training
      3. Vehicle maintenance
      4. Decision driving
      5. Observational reports
   5. Vehicle incidents
      1. Incident report (F300.0037)
      2. Emergency kits
   6. Driving continuing education
   7. Maintenance and Inspection
   8. Electric Carts, Personnel & Burden Carriers
      1. Rules and Guidelines
      2. Pre-Operations review
      3. Training
      4. Qualifications
3. **General Safety Policy SP-02**
   1. Safety Statement
   2. Apparel
   3. Attitude and Actions on the Job
   4. Trash & sharps
   5. Emergency Equipment
   6. Elevators
   7. Intoxicating substances
      1. Use
      2. Possession on person / on property
   8. Injuries & Near Miss
      1. Identification
      2. Reporting
      3. Unsafe conditions
   9. Air hoses
   10. Equipment / Supply storage & Use
   11. Employee health and appearance
   12. Trash compactors and bailers
   13. Waste Handling
   14. Authorized site access
       1. Employees
       2. Visitors
       3. Site policy
   15. Cell phones & electronics
   16. Chemical Usage
       1. PPE
       2. Training
       3. Mixing Chemicals
       4. Eye wash – First Aid
       5. Goggle policy – PPE
       6. Storage
       7. Labeling – HazCom/SDS
   17. Electrical
       1. Extension cords
       2. Repair
       3. LOTO
       4. Live wires
       5. GFCI
   18. Lifting
       1. Proper procedures
       2. Trash procedures
       3. 1 arm loads
       4. Awkward objects
       5. Team lift
   19. Personal Protective Equipment (PPE)
       1. Fit and size
       2. Requirements – usage
       3. Hearing conservation
       4. Gloves
       5. Eye protection
       6. Fall protection
       7. Safety belts
       8. Heat stress (see SP-14)
       9. Assessment & Minimum PPEs
       10. Base Minimums by service segment
   20. Wet Floors
   21. Mechanical Transport (also see SP-01)
   22. Fire Safety
       1. Extinguishers
          1. usage
       2. Safety tips
       3. Nature of fires
   23. Stairwells
   24. Disciplinary – Fraud
4. **Safe Driver SP-3**
   1. Program identification
   2. Vehicle ID
      1. How’s my driving program
   3. Record Maintenance
   4. Employee notification and policy
   5. Review
   6. Also see SP-01 (PIT)
5. **Safety Audits SP-04**
   1. Audit forms
      1. Online documentation
   2. Frequencies
   3. Record maintenance
   4. Reviews
6. **Hazard Communication (HazCom) SP-05**
   1. HazCom Determination
   2. Disposition of Chemical
   3. Labeling
   4. SDS
      1. Books
      2. Location postings
   5. Training
   6. Pipes and Piping Systems
   7. Hazardous declaration
   8. Non-Routine Tasks
   9. Bloodborne Pathogen Cleanup
   10. Multi-employer worksites
   11. Spill containment
   12. Prevention – general
   13. Chemical mixing
       1. Procedures
       2. PPE
   14. Compliance
7. **Hearing Conservation SP-06**
   1. Program establishment
   2. Base lines
   3. Monitoring
   4. Training
      1. Documentation
   5. Audiometric Testing
   6. PPE
      1. Usage
      2. Disposable PPE
      3. Company supplies
      4. Validation
   7. Contracted testing requirements
8. **Site Safety Assessment SP-07**
   1. Procedure
   2. Assessment survey – site
   3. Assessment
      1. Head
      2. Eye
      3. Hand
      4. Foot
      5. Biological
      6. Body
   4. PPE Declaration
   5. Posting
9. **Emergency Information SP-08**
   1. Procedures
   2. Corporate
      1. Reporting
      2. Regulatory
   3. General information
   4. Site / area information
   5. Postings – sites
10. **Incident Action SP-09**
    1. Critical – 9-1-1
    2. Treatment
    3. Job site
    4. Medical refusal
    5. Eye wash stations
    6. Investigation
       1. Site
       2. HR/Safety
    7. Incident reporting (F300.0016)
    8. Governmental notification
    9. Post incident follow-ups
    10. Return to work
    11. First Aid
11. **Lock Out Tag Out – Energy Control Lockout Procedure (LOTO / ECLP) SP-10**
    1. OSHA annual audit
    2. Declared responsibilities
    3. Preparation for LOTO
    4. Sequence of LOTO systems
       1. Notification
       2. Safe plan of action – review
       3. Shut down energy
       4. Lock out
       5. Verification
    5. Restoration of energy
       1. Notification
       2. Removal of tools and persons
       3. Removal of locks
       4. Re-energization
    6. Shift change
    7. Outside service or contractors
    8. Forced removal
       1. Form F300.0060
    9. Rules
    10. Training
        1. Certification training
        2. Zero tolerance
        3. Annual reviews
        4. Spot reviews
    11. Annual inspection
    12. Annual audits
12. **Bloodborne Pathogens SP-11**
    1. Definitions – OSHA
    2. Exposure risks
       1. Janitorial – Sanitation
       2. First Responders
       3. Materials – supplies
    3. Reporting
    4. Clean-up
       1. Training
       2. Kit limitations
       3. Post clean-up
       4. Biohazard waste
    5. Hand washing
    6. Training
       1. Pre-hire
       2. Annual
       3. Documentation
    7. Opening contaminated area
    8. Hepatitis B
    9. HIV – AIDS
    10. Universal Precautions
    11. Compliance
    12. Terminology
13. **Good Manufacturing Policies (GMP) SP-12**
    1. Personal hygiene
    2. Prohibited acts
       1. General
       2. Food plant
    3. Badges – IDs
    4. Electronic devices
    5. Jewelry
       1. Exceptions
       2. Piercings
    6. Traffic Patterns
    7. Housekeeping
    8. Designated eating areas
    9. Personal belongings/lunch storage
    10. Smoking
        1. E-cigarettes
        2. Chewing tobacco
    11. Clothing
        1. Uniforms
        2. Personal cleanliness
        3. Approved clothing items, styles & fabrics
        4. Pockets
        5. Shoes
    12. PPE
        1. Bump caps / hard hats
        2. Ear protection
        3. Gloves
           1. Types
           2. Requirements –site
    13. Handwashing
        1. Methods
        2. Frequency
        3. Site policy
        4. Control of hand uses
        5. Sanitizing methods
        6. fingernails
    14. Hair
        1. Conditions & accessories
        2. Restraints – PPE
        3. Facial hair
    15. Disease control
        1. Cuts
        2. Bodily fluids
    16. Drugs
    17. Housekeeping
    18. Containers
    19. Glass – brittle plastic
    20. Raw materials
    21. Storage
    22. Lighting
    23. Tools and Materials
    24. Food (product) safety
    25. Chemicals
        1. Approvals
        2. SDS
        3. Usage logs
        4. Other
    26. Food Security
14. **Heights SP-13**
    1. High work – Identified
    2. High work equipment
    3. Scaffolding
    4. Ladders
       1. OSHA / ANSI specifications
       2. Pre-task assessment
       3. Inspections
       4. Proper placement
    5. Moving platforms
       1. General safety
       2. Route inspection
       3. Pre-inspection
       4. Certification – training
       5. Loads
    6. Harness – fall protection
       1. Training
       2. PPE types
       3. Lanyards
          1. Types
          2. Tie off points
       4. Storage
       5. Inspections
          1. Pre-use
          2. Annual competent audit
          3. Logs (F414.0036)
       6. Training
          1. Certified trainers
          2. Re-training
          3. Documentation
15. **Heat Stress SP-14**
    1. Casual factors
    2. Types of Heat Disorders
       1. Heat stroke
       2. Heat Exhaustion
       3. Heat Cramps
       4. Heat Collapse
       5. Heat Rashes
       6. Heat Fatigue
    3. Work Assessment Tables
       1. Work breaking
       2. Hydration requirements
       3. PPE
       4. Heat Index tables
    4. Hydration distribution
       1. Normal conditions
       2. High heat conditions
       3. Extreme heat conditions
    5. Responsibility
       1. Site management
       2. Employee
       3. Duties
       4. Monitoring
    6. Preventative controls
       1. Administrative
       2. Training
       3. Acclimatization
       4. Weather conditions
       5. Work/rest cycles
       6. Fluid intake
    7. Engineering
    8. PPE
16. **Respiratory – Dust Mask SP-15**
    1. Usage
       1. Required use
       2. Voluntary use
    2. Provisions
    3. Usage
       1. Notification
       2. Training
    4. Medical
       1. Evaluation
          1. Physical – annual
          2. Pulmonary – annual
       2. Fit testing
    5. Atmospheres
    6. Maintenance
    7. Storage
    8. OSHA App D of 1910.134
17. Confined Space
    1. Definition
    2. Permit Required CS
       1. Potentially hazardous atmosphere
       2. Material with potential engulfment
       3. Configuration
       4. Any other recognized safety or health hazard
    3. Crew duties
       1. Authorized entrant
       2. Attendant
       3. Entry Supervisor
    4. Identification and warning signs
    5. Required permits
       1. CS Entry Permit form F300.0069
       2. Preparation
       3. On-site rescue plan (SP15W.0001)
    6. Atmosphere
    7. Training
       1. Certification
       2. Re-training
    8. Rescue
       1. Site rescue
       2. Offsite rescue
       3. Prohibitions
       4. Annual trials – tests
       5. Rescue summons
    9. PPE
       1. General
       2. Full body
    10. Non-GDI Operations
18. **Combustible Dust SP-18**
    1. Training
       1. Awareness
       2. Audit review – F300.0081
       3. Dust mask policy
          1. Training F300.0077
          2. OSHA Appdx D 1910.134
          3. See SP-12
    2. Working methods
    3. PPE
       1. Flame resistant (NFPA 70E)
       2. Air filtration
       3. Shielded (stage II) power equipment
       4. Anti-static
          1. Tools
          2. Clothing
          3. Foot ware