

Omni Facility Services 24300 Southfield Road, Suite 220 Southfield, Michigan 48075	Corporate Master Safety Policy	
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**Safety Manual
Master Safety Policy**

Approved:

Ahmed Boomrod, CEO/President

Approved:

Michael G. Cadotte, Director
Administration, Safety & Quality

Change Record

Rev.:	Date:	Responsible Person:	Description of Change:
0	05/07/08	M. Cadotte, Director	Initial Release
1	06/05/09	M. Cadotte, Director	EYE protection updates [sections: 4.8 and 4.8.4]
2	01/11/11	M Cadotte, Director Corp Qlty/Safety	Added additional chemical safety language to section §4.8.1 ¶ 3
3	10/06/2011	M Cadotte	Annual Audit – defined 4.8.7 to include site safety team duties more clearly.

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1. Purpose

Omni Facility Service's Master Safety Policy is designed to highlight the various components of our comprehensive safety program. In regards to service vendors, this policy should act as a guide for compliance with OFS's safety policies but in no manner should constitute the requirements for a complete, comprehensive safety program or policy.

2. Scope

This policy, and all referenced and non-referenced safety policies within this document, applies to all OFS employees, contract employees, vendors and service vendors.

3. Responsibility

Omni's Director of Safety is responsible for the maintenance of this policy, distribution and document control. Copies of this policy will be on file at Omni's administrative offices in Southfield where employees, vendors and contractors may obtain copies at any time. It is the responsibility of vendors and contractors to maintain an updated version of this policy on all OFS job sites and work projects at all times.

4. Procedure

4.1 **Regulatory Compliance** - All OFS employees, contract employees, vendors and service vendors shall follow all OSHA, Federal, State and Local safety standards at all times. Furthermore, all such individuals shall have a copy of OFS's general safety policy [SP-02] posted on each job site and be in compliance with SP-02 at all times. Other reasonable safety rules and practices established by OFS's representatives prior to or during a project shall be adhered to.

4.2 **Training** - All OFS employees, contract employees and service vendors shall maintain the following safety training:

4.2.1. **Pre-Hire Training** - Prior to initial assignment on an OFS job site or office all persons shall be trained in an OSHA compliant safety program that covers: Right-to-Know, Bloodborne Pathogen Awareness, Bodily Fluid Cleanup Procedures, OFS's Hazard Communication Policy [SP-05] and a review of OFS's General Safety Policy [SP-02].

4.2.2. **Site Safety Training** - All persons shall be trained on any site specific safety issues, concerns and customer policies. This includes, but not limited to, site PPE requirements for each job performed and site safety and emergency policies.

4.2.3. Mandatory Annual Reviews

4.2.4. Annually all personal shall review the following safety policies: Right-to-Know, Hazard Communication [SP-05] and job site evacuation/shelter information [commonly referred to as 'Weather Alert' awareness].

4.2.5. All training of OFS employees or contract employees shall be document with training sign-off sheets [F300-0025] and updated individual employee training matrix files. Contractors and service vendors shall maintain a similar documentation system and make said system available to OFS.

4.3 **Safety Coordinators** - OFS has identified its Director of Safety as the corporate representative that is directly responsible for all safety programs, policy and documentation for all sites, employees, contract employees, vendors and service vendors.

4.3.1. **Job Sites / Area Operations** - Site management and/or area operations coordinators/managers (site safety coordinators when applicable) maintain direct responsibility of job site safety and implementing safety training and directives from the Director of Safety.

4.3.2. All safety coordinators/managers shall be responsible for the adherence and implementation of this safety policy and all other safety programs and policies as laid out by OFS and site specific customer requirements.

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4.4 Reporting & Investigations

4.4.1. **Reporting an Incident or Safety Violation** - Whenever there is an incident where an injury or first aid event has occurred, a near miss, property damage, harassment and/or chemical spill an incident report [F300-0016] must be completed (both sides) and faxed to the Southfield administrative offices (248.483.3176) during the same shift as the incident occurred. Site managers should notify their immediate supervisor immediately of the situation even if it is a generic notification without all known details as well as an onsite customer representative IF required / applicable of the customer. Be sure to include names of witnesses, a DETAILED account as to what occurred and what actions you have taken during and after the incident. In the event the customer also requires a copy of an incident report OR has their own report then you shall complete the OFS form and the customer's form then send both to the customer and just the OFS Incident Report [F300-0016] to the administrative offices.

Reports should also be reviewed with a site manager's direct supervisor as soon as possible to alert them to the situation and allow them the opportunity to discuss actions and preventative issues.

Note: see section 4.5 for information on sending an employee for medical attention and/or first aid care.

Note: follow all aspects of OFS's Incident Action Procedure [SP-09].

4.4.2. **Investigations** - When, in the course of documenting a safety incident, the need arises to further investigate the situation (should perform an investigation any time there was potential serious risk of injury and/or employee, contract employee for service vendor is sent for any sort of medical care beyond simple first aid and even if only a first aid case when serious injury was possible) the site manager should photograph the area where the incident occurs whenever possible, document a detailed timeline of events leading up to the incident and have all witnesses write their own statements as to what they witnessed (not what they were told by others). This information should be submitted as soon as possible to OFS HR but do not hold up sending the Incident Report [F300-0016] even if your investigation is ongoing – this report MUST be submitted as soon as possible.

Be sure to make a note of the time of the incident, was the employee working overtime, any physical conditions such as water on the ground, temperature in the area (if relevant), any unusual issues/concerns you may have the develop as a result of your investigation.

It is OFS's policy NOT to discuss incidents with other employees, contract employees, vendors, service vendors or customer employees beyond what is necessary to perform a valid investigation. All questions in regards to medical care, treatment, restrictions or events should be directed to OFS HR and/or Safety departments.

4.5 Medical Care / First Aid

4.5.1. **Medical Refusal** - In the event an employee or contract employee is injured they do have the right to refuse any medical treatment IF the site manager/supervisor determines that the injury is not life threatening, may become life threatening or poses no obvious risk to the employee. If an employee elects to forgo medical care they must complete a Medical Refusal Form [F300-0013] and that form should be faxed over with the incident report [F300-0016] as required in section 4.4.1.

4.5.2. **First Aid** - If an employee requires first aid beyond the site medical kit or desires to have a medical expert review their injury or the site manager determines the need for a medical

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expert to review the injury the employee should be sent to an approved company clinic. OFS contracts medical services with Concentra and occasionally with other providers in the event there is not a Concentra clinic near the job site.

The name, address, phone number of the clinic shall be posted at the job site.

In the event the injury occurs after clinic hours (where there are no 24 hour clinics available) the employee is directed to go home and visit the clinic the very next morning upon opening. In the event of pain & suffering requires immediate attention then the employee would be authorized to seek treatment at the nearest hospital emergency room where a manager should travel with them and inform hospital admissions this is a work related injury and provide any company information they may require. This option should only be utilized when it is not deemed particle or safe to make an employee wait until the next day for clinic services (examples: broken bone or deep cut requiring stitches and/or will not stop bleeding).

OFS employees, contract employees, vendors or service vendors are not authorized or allowed to diagnose or treat any medical condition or injury. First aid should be handled by the employee (in the event of taking an OTC pain medication or apply a bandage) or a certified medical professional.

- 4.5.3. **Emergency Care - In the event of a severe and life threatening injury call 9-1-1 immediately.** Any condition that is life threatening, may lead to a life threatening condition or is of a dire nature should result in the employee's immediate treatment at the nearest hospital emergency room following the same basic procedures as stated in 4.5.2 ¶3 above. An incident report must be completed immediately after the employee has received emergency care, faxed to OFS's administrative offices and immediate supervisor must be notified.

In the event of a loss of limb (hand, finger, toe, leg or arm), death OR 3 or more persons sent for medical treatment on the same shift then OFS's director of safety [Michael G. Cadotte – 248.388.2481] must be notified immediately after emergency action to treat the effected has been completed.

Note: follow all aspects of OFS's Incident Action Procedure [SP-09].

- 4.6 **Modified – Lost Work** - As a result of a work related injury an employee may be issued light duty work restrictions (modified work) and may be instructed not to work (lost work) for a period of time. It is very important to follow these conditions and keep OFS HR posted of any changes, actions of the employee or clinic in regards to these instructions.
- 4.6.1. **Modified Work** – is only authorized and recognized when it's work related (if not work related employee is not allowed back to work until they have a NO work restriction release from their physician). Supervisors/managers shall work with OFS HR to determine the best possible course of action for the employee that fits within their work restrictions. Site managers must comply with all restrictions regardless if they feel they are logical or fair.
- 4.6.2. **Loss Work** – results when the employee, due to a work related injury, is not allowed to work based on a doctor's evaluation. During this loss work period the employee's time should be recorded as a normal day's hours worked but noted at Worker's Compensation (WC) and be sure to notify payroll as well to this fact as different accounting rules apply to these hours. Further, keep in contact with your employee to show concern for their well being and to determine any new issues with their case – report such changes to OFS HR immediately.
- 4.6.3. Follow-up clinical visitations are to be made during an employee's normal time away from work and is the responsibility of the employee to make and keep all follow up visitations. Report all cases to OFS HR where this is not the case immediately.

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- 4.7 **HIPPA Compliance (Employee Privacy)** - OFS, its officers and employees shall comply with all aspects of the U.S. government's Department of Health and Human Services privacy regulations (HIPPA). All medial information, worker's compensation information, physicals, drug test information shall be sent to OFS HR and never kept on site. Further, no OFS employee, contract employee, vendor or service vendor with knowledge of an OFS employee's medical status or condition shall discuss such status or condition with any person other than OFS HR and the employee directly (unless there is a legal representative for said employee – this does not include a spouse or parent).

In the event a customer is requesting such information they should be directed to OFS HR for further assistance.

4.8 Job Site Safety

- 4.8.1. **Chemical Storage & Handling** - All material stored in tiers shall be stacked, racked, blocked, interlocked, or otherwise secured to prevent sliding, falling or collapse. All materials should be greater than 2 feet from any ceiling or fire suppression system device.

All product should be (whenever possible) removed from the cases they came in and stored neatly in storage areas. **All items and all chemicals shall be properly labeled** as required in OFS's Hazard Communication Policy [SP-05 section 4.3].

Wherever chemical mix/pouring takes place goggle eye protection shall be worn. Employees shall further be instructed to use cold tap water (not hot) when mixing chemicals and to always add chemical to water – NEVER water to chemical. Pursuant to OFS safety policy SP-02.

When handling chemicals (transferring from one container to another) proper gloves and eye goggles must be worn at all times.

- 4.8.2. **Non-conforming Product** - Product that is defective, deemed unsafe for use, requires return to vendor or for any other reason deemed necessary to removed for active stock shall be segregated to a designated area of the warehouse / storage area to wait for removal.
- 4.8.3. **Declaration of Hazardous Materials** - Each job site shall have a Hazardous Material Sheet [SP-06] that identifies what chemicals are in use at that specific job site and their level of severity. This document shall remain with the MSDS book located in the area where chemicals are utilized and accessible to employees. Vendors and Service Vendors performing work on OFS job sites shall maintain a similar list onsite and keep a copy on file with OFS Safety and further maintain updated copies when chemicals are no longer in use at a job site or add to a job site.
- 4.8.4. **Personal Protective Equipment** - The use of Personal Protective Equipment (PPE) will be determined on a site by site basis and reported / identified to al employees. The use of safety GOGGLES is required whenever an employee transfers a liquid from one container to another as well as approved gloves. Gloves shall also be worn during cleaning duties that may expose one's skin to potential pathogens and/or bacteria. Gloves also shall be worn whenever working with sharp materials such as cut metal. Safety vests will be utilized on all job sites where the customer has deemed them necessary – OFS employees, contract employees and Service Vendors must comply with this and all site safety rules and regulations.
- 4.8.5. **Safe Dress Code** - Pursuant to Omni's General Safety Policies [SP-02] all OFS employees, contract employees and Service Vendors shall adhere to the following dress codes:
- Proper footwear and clothing shall be worn at all times.
 - Open-toed shoes, sandals, shower clogs and thongs are forbidden. Shoes must have non-slip soles and a closed heel and toe.

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- Shorts, skirts, any clothing that exposes the leg, sleeveless shirts, halter/tube tops, miniskirts and tights are examples of inappropriate clothing
- Do not wear baggy clothing or jewelry.
- Avoid keeping long hair in a down position/style while at work to avoid danger of catching in/on a moving object.
- Employees should keep themselves in proper physical condition to do a day's work in an alert manner.

4.8.6. **Job Site Safety Audits** – Each job site shall undergo a safety audit/review monthly by site management, area operations management or by members of OFS management pursuant to OFS Safety Policy SP-04.

4.8.7. **Site Safety Teams** – job sites large enough to support onsite management shall develop site safety teams. Teams will meet at least monthly to:

- a. Review current safety incidents
- b. Review any changes to SDS
- c. Discuss any PPE needs or concerns
- d. Discuss any noticeable safety concerns that should be brought to the customer
- e. Conduct site safety audit together
- f. General idea / brainstorming session

4.9 **Hazard Communication** - All OFS employees and contract employees shall be completely familiar with, and adhere to, Omni's Hazard Communication Policy [SP-05]. All Vendors and Service Vendors that perform any work on OFS job sites shall demonstrate a written hazard communication program that is OSHA compliant and have a copy of such a program on file with OFS's safety department prior to any work activity.

4.9.1. **Training** - Employees shall be given hazard communication awareness training prior to actively working for OFS and shall be given a copy of the Omni's Hazard Communication [SP-05] policy. Employees shall receive updates/refresher training on hazard communication annually.

4.10 **Lockout / Tagout – Energy Control Lockout Policy** – ECLP (Lockout Tagout) is not something commonly required in most janitorial environments but for those job sites (manufacturing plants, food plants, etc) where it is, OFS employees and contract employees shall follow all customer site policies as well as Omni's ECLP policy [SP-10] at all times. Although awareness training on ECLP may be given to any employee only qualified, trained and authorized personnel shall initiate a lock out. Each person working under a lockout program shall apply his/her personal lock and tag (some job site may not require a tag). The key shall remain under the exclusive control of the qualified person installing the lock. A pre-task analysis of the ECLP procedure will be completed and reviewed by all parties involved in the lock out. When performing a lock out each employee shall review the posted placards on the equipment to be aware of energy isolation devices and follow all customer postings and directives. Employees authorized in ECLP shall follow all aspects of OFS ECLP policy [SP-10] and work instructions [SP10W.0001] at all times.

4.11 **Motor Vehicles** - Only trained and authorized employees are permitted to drive motorized vehicles on or in a job site. Only authorized / approved personnel may drive an automobile (theirs, another persons or the company's) while on company time. OFS Safety Department will review all MVRs and follow OFS Motor Vehicle Record Criteria [F300-0030] in determining an employee's ability to perform such duties on company time. Service Vendors working for OFS shall have a similar policy in place and made available to OFS Safety.

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All OFS employees, contract employees shall follow all aspects of Omni's motor vehicle policy [SP-01] at all times.

4.12 **Weapons** - All forms of illegal weapons and firearms (including all pocket knives) as well as legally registered weapons and firearms are prohibited on all OFS job sites, offices and properties. Strict adherence to this policy is required and the police will be notified to remove any individual who is out of compliance with this policy or poses any sort of threat to another person.

4.13 **Disciplinary Procedure** - The following is to provide a guideline for the enforcement of all safety rules, policies, procedures and directives.

- All employees will be subject to disciplinary action for violations of safety rules.
- All employees shall be afforded counseling and/or training to assure a clear understanding of the infraction and the proper conduct under company guidelines. However, nothing in this disciplinary policy or safety policy will preclude management from terminating an employee for a safety violation. This is not a progressive discipline system.
- All employees shall be subject to disciplinary action up to and including termination for the following reasons:
 - Repeated safety rule violations.
 - Failure to report accidents.
 - Failure to control and/or report unsafe conditions or work practice.
 - Failure to maintain good housekeeping standards and cleanliness.
 - Failure to follow supervisor's instructions.

5. Related Documents

- SP-01 Motor Vehicles
- SP-02 General Safety Policies
- SP-04 Job Site Safety Audits
- SP-05 Hazard Communication Policy
- SP-06 Hazardous Materials Declaration
- SP-07 Site Hazard Assessment
- SP-08 Corporate Emergency Policy
- SP-09 Incident Action Procedure
- SP-10 ECLP
- Safe Driver Performance Expectations, form F300-0028
- Procedure to follow in a Vehicle Crash, form F300-0029
- Motor Vehicle Record Criteria – Employee Acknowledgment & Agreement, form F300-0030
- Driver Questionnaire, form F300-0027
- Training Sign-In, form F300-0025
- ECLP Work Instructions, from SP10W.0001
- Incident Report, form F300-0016
- Medical Refusal Form, form F300-0013