

# **Wilmot Modular Structures**

## **Employee Safety Handbook**

## **STATEMENT OF POLICY**

Our company policy is to perform work in the safest manner possible, consistent with good industry practices, to fulfill this commitment. An organized and effective safety program must be carried out whenever and wherever we perform work.

Responsibilities for the implementation of the safety program are as follows. The safety director is responsible for overseeing the entire program. All other areas are as follows:

Yard – Yard Supervisor  
The road – each driver  
Job site – Supervisor or person assigned by service manager  
Office – Office Manager  
Field - Field Manager

We recognize that accidents usually result from poor decisions and the lack of proper planning, supervision, maintenance, employee selection, training, etc. These are the same deficiencies that adversely affect productivity, cost, employee relations and public relations. Therefore, your safety record is usually a reliable indicator of your general effectiveness as an employee and measure of value to our company.

We want you to realize that our company has no higher priority than safety. Therefore, safety needs to be an obvious and integral part of your thoughts and actions at all times.

## **SAFETY PROGRAM OBJECTIVES**

1. To safeguard the health, welfare, and property of Wilmot Modular Structures and the general public by preventing accidents.
2. To conform to federal, state and local regulations.
3. To improve our overall efficiency and productivity while controlling our losses and expenses. This keeps our company profitable in the highly competitive modular structure industry and ultimately protects the jobs and associated benefits of everyone that is part of Wilmot Modular Structures.

## **A POSITIVE ATTITUDE**

Accidents can and should be prevented! This attitude is the corner stone of any safety program. When we believe that accidents can and should be prevented, then we can work together to find the best overall solutions for the risks faced while performing our jobs. Those believing that accidents are a normal part of business become a tremendous liability to our company because money can be lost much faster than it can be made.

Our entire safety program is designed to build a positive attitude, by all employees, toward accident prevention. However, it takes time, energy, and patience for everyone to build that right attitude. It is critical for the company to be consistent in building its safety program in a positive manner. In essence, our attitude is an accurate indicator of the results we will achieve. Therefore, it must be positive!

## **RISK EVALUATION**

Knowing the risk we face ahead of time is probably the single largest factor affecting our ability to prevent accidents. We simply can't expect to prevent accidents if we don't know (or remember) that certain risks exist.

Planning is the key to any successful operation.

Hazard analysis is a simple tool used to foresee problems when planning a job. The usual process is as follows:

1. Develop a general plan for the job's operation
2. Break the plan down into sequential steps
3. Determine what resources are needed - tools, materials, equipment, etc.
4. Determine what can go wrong
5. Decide how to best solve the potential problems

For a simple operation, this process may consist of just a few quiet minutes to think about operation. For complex jobs, this needs to be put on paper and reviewed by the appropriate safety team member.

## **WILMOT MODULAR STRUCTURES** **EMPLOYEE RESPONSIBILITIES**

**WARNING!** New employees have an exceptionally high accident rate! Use this information to focus your attention on accident prevention. Your health is well worth protecting.

### **Basic Work Rules**

1. Do not report to work under the influence of illegal drugs or alcohol. Illegal drugs and alcohol are not allowed at work at any time. Notify your supervisor if a prescription drug may affect your ability to work safely.
2. Report all injuries to your supervisor immediately, even if the injury does not need medical care. First-aid supplies are kept in the OPS. break room.
3. Immediately correct any unsafe condition that is under your control. If you can't correct a problem, then bring it to your Service Manager's attention.
4. Maintain good housekeeping at all times so as to eliminate tripping hazards and reduce the risk of fire. Know where fire extinguishers are located.
5. Be considerate of the safety of other employees. Do not distract their attention or engage in horseplay!
6. Fighting, handguns, rifles, and other weapons are not allowed at any time on Wilmot's property or any jobsite.
7. Anyone caught stealing will be fired and prosecuted to the fullest extent of the law.

### **Protective Equipment**

1. Hardhats should be worn by everyone when required.
2. Wear clothing that is suitable for the weather and for the work you will be performing. Pants and a T-shirt are our minimum requirements. Tank tops and mesh shirts are not acceptable.
3. Wear sturdy work boots that are kept in good repair. Sneakers and lightweight shoes are not acceptable.
4. Rings, bracelets, neck chains, earrings, and other jewelry should not be worn. They can snag on objects and cause severe injuries.

### **Protective Equipment (cont.)**

5. Eye protection should be worn when working with power tools, and whenever there is significant risk of eye injury. A faceshield shall be worn when using a cut off saw, grinder, or dangerous chemicals such as acids. Cutting faceshield (not glasses) shall be worn when using a cutting torch.
6. Safety belts and lanyards will be used where there is a risk of falling six feet or more.
7. Wear gloves when handling sharp, rough, hot or cold objects.
8. Respirators shall be worn when you are exposed to harmful dusts, fumes, mists, smoke, gases, vapors, or sprays.
9. Hearing protection, such as earplugs or earmuffs, shall be worn in noisy areas.

### **Tools & Equipment**

1. Operate tools, equipment, and vehicles only if you are properly trained and authorized. Drivers must have a valid commercial driver's license.
2. Drivers, operators, and passengers must wear seatbelts in all vehicles.
3. Don't attempt to ride on the running boards, or anywhere else on a piece of equipment. All passengers must be seated on a passenger's seat.
4. Everyone is responsible for inspecting the tools and equipment they use. Unsafe tools and equipment shall not be used. Either make the necessary repairs or get a replacement from the Service Manager.
5. Shut off all machinery and equipment before doing any service work such as repairs, adjustments, oiling or greasing. Make sure all guards are replaced when service work is complete.
6. Do not remove or disable guards that are part of power tools and equipment.
7. Keep alert around moving equipment, and don't assume that the operator sees you.

## **Dangers to Keep in Mind**

1. Protect your back! Lift correctly by using your legs and keeping your back straight. Get help for heavy loads and don't attempt to perform work that is beyond your physical abilities.
2. Watch out for pinch points. Don't allow your hands, feet, or body to be crushed between two objects.
3. Avoid getting in an off-balance position when pulling, pushing, or prying – especially at heights.
4. Never leave nails sticking out of lumber. Remove nails from reusable lumber and bend them over in scrap.
5. Don't work above or below other people unless proper precautions have been taken to protect everyone.

## **DISCIPLINARY PROGRAM**

Formal discipline is the least desirable way to obtain compliance with our safety program. It tends to create a negative confrontational attitude toward safety, rather than a positive productive atmosphere. However, there are times when formal discipline is necessary.

Management's preference is to develop a cooperative attitude by explaining and discussing the company's safety requirements and the reasoning for each one. Special emphasis should be placed on the highest risks.

Next, Management needs to react when unsafe acts or conditions are found. Otherwise we have effectively condoned it. If you fail to react to a safety problem, then you have become part of the problem, not part of the solution.

If the safety problem is relatively minor, then the safety requirements and why we have them needs to once again be explained. Answer any question the employee may have and try to get a commitment from them to work with the company on correcting the problem.

If the safety problem is serious or if minor problems are being repeated, then some form of discipline is necessary.

When a person's safety record falls below average, then Management must consider termination of his or her employment. A written warning will first be used, unless the problem is extremely serious.

When a person is productive but not up to par in safety, then we may consider giving the person a few days off without pay. Once again, we should have tried to reason with the person and a written warning is a good intermediate step.

## **Disciplinary Program (cont.)**

Anyone who feels they have been unfairly treated can appeal any decision through the normal chain of command.

Any employee who willfully violates a safety policy or procedure will be disciplined in the following manner:

First Violation: Verbal warning

Second Violation: Written warning, must be placed in employee's personnel file

Third Violation: Written warning with a reprimand with actions up to discharge

### **Exception:**

A serious violation may call for discharge on the first offense. A serious violation is defined as a violation that causes or could cause serious harm to the employee or to a co-worker. All serious violations must be reviewed with corporate personnel to determine whether discharge or a lesser penalty is appropriate.

## **INSPECTIONS**

Safety inspections are a vital part of our safety program because they are a fast, easy and effective way to find and correct unsafe acts and conditions before they cause an accident. This explains why everyone who is part of Wilmot Modular Structures is a safety inspector.

Each person is responsible, on a daily basis, for checking the area they work in, as well as the tools, materials, and equipment they use. Whenever possible, unsafe conditions should be corrected immediately. Conditions that can't be handled by the individual should be brought to his or her supervisor's attention.

Also be aware of unsafe acts. Teach inexperienced people the right way to perform their work and remind craftsmen to use their safety knowledge.

Inspections are a highly efficient way to promote safety. Most individuals can check their tools and work areas in less than a minute. This is a small investment by any measure, particularly when you consider the effect it has on reducing injuries.

Managers should spot check all operations to make sure the inspection program is working smoothly. A few minutes should be taken during each job visit to evaluate an operation or check a piece of equipment. Your interest and leadership will have a tremendous impact of others!

Naturally, if inspections are being done, then problems will be found. By correcting the situation promptly you effectively reinforce our commitment to safety in the eyes of your coworkers. However, failure to react quickly when problems are brought to your attention soon destroys any interest in safety.

## **INSPECTIONS (cont.)**

In summary, use brief daily inspections to keep everyone involved in safety and prepare yourself to handle the problems that are found. However, don't be satisfied with correcting a problem. Determine its source and prevent it!

Persons responsible for inspecting specific areas:

Yard Manager – Renovation area & equipment

Drivers – Trucks & portable equipment

Office Manager – Office area & equipment

Field Manager -- Field operations

## **WILMOT MODULAR STRUCTURES**

### **Subcontractor Safety Guidelines**

Subcontractors shall conduct their operations to ensure the protection of employees. By agreeing to our Subcontractor Agreement, a Subcontractor agrees to comply with all federal, state and local safety regulations and to enforce the rules listed below.

1. Alcohol, illegal drugs, guns, and other weapons shall not be brought onto the job site at anytime. No employee shall report for work under the influence of drugs or alcohol.
2. Sturdy leather work boots shall be worn by everyone. Sneakers and lightweight shoes are prohibited.
3. Shirts (at least a tee shirt) and other suitable clothing shall be worn at all times. Tank tops are not acceptable.
4. Proper eye protection must be worn when grinding, cutting, or using a cut off saw.
5. Fall protection shall be used by everyone working six or more feet above the ground; this includes the use of harnesses and lanyards.
6. Trucks and equipment with a restricted rear view shall have back-up alarms.
7. Good housekeeping shall be maintained at all times. Subcontractor shall ensure prompt removal of trash with the work area and surrounding areas free of debris at all times as well as the orderly storage of work materials, and immediate removal or bending over of protruding nails.
8. Right-to-Know laws require Subcontractor to submit Material Safety Data Sheets to Wilmot Modular Structures for each hazardous substance they supply for us on a project prior to starting the job.

## **TOOLBOX MEETINGS**

Weekly toolbox meetings are one of the cornerstones of an effective safety program. They reinforce our commitment to safety and remind everyone that safety is an expected part of their job performance.

The Safety Director is expected to hold toolbox meetings on a regular basis. Our Safety Director will distribute information that can be used for these meetings. However, the topic may not always be applicable to every work crew.

One of the main reasons for holding toolbox meetings is to provide the training necessary for people to perform their work safely and efficiently.

Information is readily available from our Safety Director on practically any safety-related topic you can imagine. If you are unfamiliar with an operation or if you simply want more information, ask for it.

## **HOUSEKEEPING**

Housekeeping makes a highly visible statement about our company because our workplace is a reflection of our attitudes and priorities. Naturally this statement should be strongly positive. It is very difficult to convince anyone of our concern for safety and quality if the job site is a sloppy disorganized war zone.

It has been estimated that 1/3(one-third) of all on-the-job accidents are related to poor housekeeping. Literally thousands of workers are injured each year because they slip, trip, stumble, or step on objects that are in their way. Although these accidents are usually blamed on carelessness, they are actually the direct result of poor housekeeping.

Good housekeeping is also part of any fire prevention program. Trash, Pasteboard, boxes, oily rags, and other scrap materials are an excellent source of fuel. It isn't unusual for a work area or office to be burned out if housekeeping falls behind.

One clear way to measure your housekeeping effectiveness is by injuries. Nail puncture wounds should never happen in our workplace. When stripping lumber, pull nails out of reusable lumber and bend nails over in scrap, immediately. In rare cases where this is not possible, the area should be barricaded so that no one steps on a nail.

Another point to keep in mind is that housekeeping needs to be intensified prior to winter weather. Trash and tripping hazards covered by snow are more dangerous and difficult to see and clean up.

## **Housekeeping (cont.)**

Good housekeeping is a daily integral part of each operation. The old routine of stopping to clean up only after a state of disaster has been declared results in us maximizing our risk and minimizing our benefits. A disaster area shows that housekeeping is being used as a last resort rather than as an accident prevention tool.

## **PERSONAL PROTECTIVE AND EMERGENCY EQUIPMENT**

Here is a list of the most commonly used personal protective and emergency equipment:

- First-aid kit
- Fire Extinguisher
- Hard hats
- Glasses, goggles, and face shields
- Cutting goggles and welding shields
- Ear plugs or muffs
- Respirators
- Gloves – rubber or leather
- Knee pads
- Safety belts and lanyards

## **EYE AND FACE PROTECTION**

Eye injuries are a problem in the modular industry. This should not be surprising because every job we do has certain risks to our eyes. These risks may involve flying objects from drilling, grinding, and sawing. It may involve pressurized liquids or compressed air or steam cleaning. Another risk involves radiation burns from cutting or welding. There are also the possibilities of chemical burns from epoxies, battery acid, fuels, cleaners, paint thinners, etc. If nothing else, we all face the possibility of wind blowing something into our eyes. Naturally, you can understand why we suggest that everyone wear eye protection **all** the time.

Safety glasses provide adequate protection for most work, however, the following jobs require extra protection:

1. Grinding – goggles or a face shield
2. Cutting torch – a shade #5 face shield and gloves
3. Welding – welding helmet with the proper shade glass and gloves
4. Pressure washing – face shield

Our goal is to make sure no one suffers eye injury that might destroy his or her eyesight. We will provide whatever protective equipment is needed to reach this goal. All we ask is that you use it **before** an accident happens!

## **RIGHT TO KNOW**

Everyone has a need and right to know what chemical substances they are working with.

These chemicals come in many different forms such as gases, liquids, fumes, etc. In order to protect your health, it is important to use these chemicals safely.

There are two main sources for chemical safety information; labels and “Material Safety Data Sheets” (MSDS)

Labels can be found on the bag, box, barrel, bottle, or other container that product is delivered in. Labels give you a brief idea of how to use the product safely.

More detailed information can be found on the product’s MSDS (Material Safety Data Sheet). A MSDS tells you what the dangerous ingredients are, how to store and use the product safely, what injuries it can cause, how to protect yourself, what to do for first-aid, and much more.

Each new hire receives basic training about the Right to Know Law when he or she is hired and each employee is require to:

1. Know what chemical substances he or she works with.
2. Know how to use these chemicals safely.
3. Work safely with these chemicals, based on information found on the MSDS.
4. Use all necessary protective equipment.

In summary, chemicals have become a serious yet necessary part of our business. By using this information, we manage to use them safely.

## **EMERGENCY PROCEDURES**

### **IN CASE OF FIRE**

1. Call the fire department immediately if there is any doubt about your ability to put out the fire. Realize that fires can get out of hand quickly and it doesn't cost us anything for the fire department to respond.
2. The Service Manager shall take charge of the situation until he is relieved by the fire department. He will keep all employees and the general public away from any danger. He shall also meet the fire department when they arrive and provide whatever assistance they may need.
3. Know where fire extinguishers are located and how to use them.
4. Remember that our first priority is to protect our people. Put out the fire if you can do so safely. However, don't expose anyone to the possibility of being trapped in a burning structure or being near burning barrels, tires, fuel tanks, compressed gas bottles, or any other possibly explosive substances. Also, remember that many burning substances produce toxic smoke, so no one should breathe it.
5. Report any incidents to the Safety Director at the main office as soon as any emergency situation has been properly controlled.

### **IN CASE OF ACCIDENTS**

1. Call for an ambulance immediately if there is any indication that it may be needed. Remember, it doesn't cost anything for an ambulance to respond. Provide the exact location of the accident, the number of people injured, and if possible, the severity of the injuries.
2. The Service Manager will take charge of the situation until authorized emergency personnel relieve him. He shall provide whatever assistance may be necessary.
3. Be familiar with emergency first-aid procedures.
4. Perform whatever immediate rescue or first-aid operations are necessary to protect people from further injury, as long as this can be done without risking the lives of other people.
5. Send someone to meet the ambulance and direct them to the accident scene.
6. Workers should stay back and out of the way of emergency personnel, but be readily available to provide whatever assistance may be required.
7. Report any incidents to the Safety Director as soon as an emergency situation has been properly controlled.

NOTE: Don't disturb or remove anything from the scene of an accident or fire until a complete investigation has been made.