

EMPLOYEE SAFETY MANUAL

TABLE OF CONTENTS

Subject	Page
Company Safety Policy Letter	2
Safety Orientation	3
Use of Chemicals / PPE	4
Safety Meetings and Inspections	5
General Safe Work Practices	6
Reporting Safety Incidents	8
Emergencies / First Aid	9
Heat / Cold / Ergonomics	10
Ladder Safety	11
Safety Disciplinary Policy	13
Appendix:	
Appendix 1 - Employee Orientation Checklist	14
Appendix 2 - Job Safety Hazard Worksheet	15
Appendix 3 - Hazard Communication Program	16
Appendix 4 - Incident Reporting Form	17
Appendix 5 – Drug Free Workplace	18

SAFETY POLICY LETTER

SAFETY AND HEALTH POLICY for McGinley Maintenance, Inc. (“MMI”)

The purpose of this Policy is to develop a high standard of safety throughout all operations of MMI. MMI is committed to help protect the health and safety of its Employees and Customers. Meeting this commitment is a primary management objective and the individual and collective responsibility of all MMI employees. To that end, we will strive to:

Communicate.... our commitment to health and safety excellence to our employees, contractors, suppliers, customers, visitors, and the communities in which we operate.

Implement.... safety programs that promote personal and professional responsibility for incorporating safe work practices into our everyday work activities.

Provide.... safe and effective products and services.

Improve.... our health and safety performance while striving to achieve industry leadership.

Comply.... with all applicable laws and regulations pertaining to health and safety.

Each individual at MMI is responsible for working safely and supporting the safety and health of those persons and coworkers around them. By accepting mutual responsibility to operate safely, we will all contribute to the well-being of our employees, our Customers, and our business. Please remember: Every day and on Every Job -- SAFETY FIRST !

McGINLEY MAINTENANCE SAFETY COMMITTEE

McGinley Maintenance, Inc. Safety Manual

SAFETY ORIENTATION

Each MMI employee will be given a safety orientation after being hired. Among the items the orientation will generally cover are the following:

- A review of MMI's Safety Program and Manual (See Appendix 1 and 2).
- Basic job safety training and Job Hazard evaluations specific to the work to be performed
- Basic safety rules for all employees, including:
 - SAFETY FIRST ! -- Safety Before Speed !
- Never do anything unsafe to get the job done.
- If you think a job is unsafe, report it to your supervisor. We will find a safer way to do that job.
- Do not alter or disable any safety device on equipment.
- Never operate a piece of equipment unless you have been trained and are authorized.
- Use PPE at all times when required.
- Obey all safety warning signs.
- Working under the influence of alcohol or illegal drugs or using them at work is strictly prohibited.
- No firearms or explosives on Customer or MMI property.
- Horseplay, running and fighting are prohibited.
- Keep steps and aisle clear and clean up spills immediately – avoid all slips, trips and falls.

- *Never lift, carry, walk on, or climb on anything you are unsure of – ask for help.*

USE OF CHEMICALS / PPE

- MMI uses a limited number of cleaning products. Employees will receive training regarding these products and SDS (Safety Data Sheets) will be provided and maintained at the work location.
- Employees must read and be familiar with the SDS before using the products and follow all instructions for use, including PPE, if necessary.
- Employees will receive information as part of our chemical hazard communication program on the hazards of these chemicals, if any, before working with them or working in an area where they are used (See Appendix 3).
- SDS will be provided and will be maintained at the job locations.
- Products must remain in original containers and labels must not be defaced or removed.
- Supervisors will examine the chemical inventory when inspecting the Customer's facility to make sure SDS and product labeling are in proper condition.

- Before you are first assigned a task, your supervisor will show you what to do along with safety instructions and, if required, necessary PPE. Supervisor will document this safety training.
- Do not use any chemical or attempt to perform your job tasks until you have received the required training and instructions on proper use of PPE, if required.
- If PPE is required, you will be instructed using the manufacturer's instructions on how to use and maintain the PPE. Your supervisor will examine the condition and supply of any required PPE.
- If the PPE becomes damaged, worn, or the supply is exhausted, employees may NOT continue to perform the job task if replacement PPE is not available. In that case, the employee must contact their supervisor immediately.

SAFETY MEETINGS AND INSPECTIONS

Employee Safety Meetings - General

- Conduct safety meetings at the beginning of each job and as necessary at other times.
- Review of any job safety evaluations conducted since the last safety meeting.
- Review of any corrective actions to avoid potential hazards.
- Evaluate any accident investigations conducted since the last meetings to determine if the cause of the unsafe acts or unsafe conditions involved were properly identified and corrected.
- Document attendance and other subjects discussed.

Job Safety Inspections - General

- Conduct safety meetings at the beginning of each job and as necessary at other times.
- Include appropriate representative members of management and employees.
- Identify potential job hazards and methods to reduce potential hazard.
- Document safety inspections and any deficiencies and areas for improvement.

GENERAL SAFE WORK PRACTICES

Housekeeping

- Good housekeeping is a critical part of your job.
- Always store materials in a safe manner, in closed, original, containers, with original labeling.
- Tie down or support materials if necessary to prevent falling, rolling, or shifting.
- Empty or unlabeled containers must not be allowed to accumulate.
- Trash must be removed as soon as possible. Trash is a safety and fire hazard.
- Immediately remove all loose materials from stairs, walkways, ramps, platforms, etc.
- Do not block aisles, traffic lanes, fire exits, gangways, or stairs.

Electrical

- Use appropriate, grounded electrical circuits.
- Electric cords will be inspected daily and repaired or replaced as necessary.
- Do not use equipment with split, broken, or loose handles, frayed cords, or other signs of damage.
- Do not attempt to repair, tamper with or remove parts from electrical equipment.
- Do not allow cords to become a trip hazard.

Personal Protective Equipment

- PPE must be worn where required by the activity or equipment instruction or Customer requirement.
- PPE includes suitable clothing (long pants, sleeved shirts, adequate foot wear, etc.), hard hats, safety glasses or goggles, hearing protection (earplugs or earmuffs), gloves, other items as needed.
- MMI will supply necessary PPE. Employees must advise MMI when PPE is needed due to the job or job requirement changes, product changes, Customer requirements, etc.

GENERAL SAFE WORK PRACTICES

Slips and Fall Avoidance / Other Safe Work Practices

In Building Maintenance, there are a number of potential workplace hazards that all employees must be aware of, including:

- Wires and cords; Loose tile and carpet
- Wet floors, spills, splashes
- Electrical outlets, cable and phone boxes
- Boxes, paper and other loose items placed in walkways, stairs
- Equipment and other items extending into hallways and walkways
- Loose clothing or slippery soled shoes
- Sharp objects – in trash or on furniture or equipment

To avoid risks associated with these issues:

- Think SAFETY FIRST !
- Be alert ! What are the potential hazards and how can they be avoided?
- Use all required PPE. Follow all label instructions and precautions.
- Use proper foot wear; walk slowly and carefully at all times, especially when floors are wet.
- Avoid shortcuts – use designated and approved walkways, stairs, hallways, etc.
- Do not remove, deface or destroy any warning, danger sign, or barricade, or interfere with any form of accident prevention device or practice provided for your use or that is being used by other workers.
- Never lift with you back – and never strain to lift an item.
- Get help with heavy or bulky materials to avoid injury to yourself or damage to material.

REPORTING SAFETY INCIDENTS

MMI wants all employees to **THINK SAFETY FIRST!** and avoid all safety incidents. However, if you are injured or become ill on the job, there are several important requirements:

1. IMMEDIATELY report the incident to your supervisor.
2. If necessary, your Supervisor will contact the local MedExpress.
3. If your Supervisor is not available, call information for the local MedExpress office.
4. If a serious injury, get immediate medical attention at the nearest hospital or other medical facility.
5. If appropriate, supervisors or another employee should accompany the employee involved in the incident to the medical facility.
6. Supervisors must contact MMI Safety Committee – 800-624-6826.
7. Supervisors or the MMI Safety Committee must follow the Incident Investigation process and complete the Incident Reporting form within 12 hours (See Appendix 4).
8. MMI Safety Committee will review the incident, conduct any further investigation, and provide any necessary follow up reporting, training, PPE, communication, or job safety assessments.
9. Supervisors must also comply with any Customer requirements for reporting safety incidents.

EMERGENCIES / FIRST AID

All employees must be familiar with the emergency evacuation routes and first aid kits at the Customer's facility. An evacuation map or exit routes should be identified by the Customer contact. Evacuation map may also show the location of fire extinguishers, first aid kits, and where to assemble outside the facility in the event of an evacuation. Employees must also follow Customer security requirements (sign in, sign out, door locking, alarm reset, etc.)

- Ask your supervisor and the Customer contact for the evacuation route and locations of first aid kits.
- If you discover a fire, water leak, or other significant potential hazard, or are otherwise instructed to evacuate the facility by the Customer, exit the facility and immediately inform the Customer.
- Tell other personnel in the area to evacuate as well. MMI employees are not emergency responders, and should not attempt to fight fires or attempt to address other building emergencies.
- Follow the individual evacuation plans as instructed by the Customer.
- Go to the designated assembly point outside the building. After the assembly point has been reached, the senior MMI employee should conduct an accurate head-count of MMI employees and inform the Customer representative of the result of the head-count.
- Contact your supervisor as soon as possible after safely evacuating the building.
- In the unlikely event of exposure to extreme temperatures or situations that creates a potential safety issue, MMI employees are authorized to exit the facility and contact their supervisor for further instructions.

HEAT / COLD / ERGONOMICS (Summary)

Most MMI employees work inside the Customer's non-production facilities. Therefore, there is expected to be little exposure to extreme heat or cold. However, in the unlikely event of exposure to extreme temperatures, employees should know how to recognize and deal with extreme temperature exposures.

Heat-Related Illnesses

Heat stress can be fatal. In the event of heat stress, emergency medical treatment should be contacted immediately; get the person out of the hot environment; loosen clothing; pour water over the person; get air circulating around the body; contact the Customer. Recognize the warning signs and symptoms of heat-related illnesses and use preventive and control measures to reduce the frequency and severity of heat illness.

Cold-Related Illnesses

To prevent cold stress in the workplace, wear the right protective gear, and move to warm areas. Take breaks in a warm location. If there is no building, sit in your vehicle with the heat on for the break period.

Ergonomics

When aspects of the work or workplace exceed the body's capabilities, the result can be a repetitive stress or repetitive motion injury. The purpose of the Ergonomics Program is to reduce the likelihood of repetitive motion injury and increase employee safety. Employees will evaluate ergonomic risks and seek to reduce hazards by Engineering Controls (physical modifications of jobs), Administrative Controls (job rotation, breaks, re-design of methods), PPE (including gloves, eye protection, etc.), and Training.

LADDER SAFETY

MMI employees are to only use portable ladders that are labeled, designed and manufactured in accordance with the provisions of the American National Standards Institute. MMI employees may not exceed an elevation of 6 feet from the ground while on a ladder without special training and fall prevention. Under no circumstances are portable ladders to be used unless conditions are considered safe, secure and in compliance with OSHA and company procedures and safe work practices. MMI Ladder Safety includes:

- The use of ladders with broken or missing rungs or steps, broken or split side rails, or other faulty or defective construction is prohibited. All rungs, cleats, and steps will be parallel, level and uniformly spaced when the ladder is being used. Employees must inspect ladders prior to use. When ladders with such defects are discovered they must be immediately removed from service and tagged as such.
- Employees will face the ladder and will not carry material or tools while ascending or descending.
- Ladders will not be loaded beyond the maximum the manufacturer's rated capacity.
- All ladders shall be placed on secure footing, and the area around the top and bottom will be kept clear.
- Planks will not be used on the top step of stepladders. Ladders shall not be spliced together.
- Portable ladders will be placed and used at a pitch that places the horizontal distance, from the top support to the foot of the ladder, at about one-quarter of the working length of the ladder. Ladders will not be used in a horizontal position as a platform, runway or scaffold.
- Ladders shall not be placed in front of doors, unless door is blocked, barricaded and guarded.
- Ladders shall not be placed on scaffold, boxes, boards, barrels, or other unstable bases or surfaces.
- Employees will not stand on the top or the step below the top of a stepladder.

- Any ladder splashed with caustic or acid shall not be used until thoroughly cleaned and inspected.
- There shall be ample clearance and clear access at the top and bottom of portable ladders.
- Portable rung ladders shall only be used with the metal supports on the underside.
- No ladder shall be used to gain access to a roof unless it extends at least 3 feet above the point of highest support with the building. Side rails must extend not less than 36” above any landing. When this is not practical, grab rails will be provided to facilitate movement to and from the point of access.
- Metal ladders will not be used for electrical work or where they may contact electrical conductors.
- All ladders shall be equipped with non-slip bases when a hazard of slipping exists.
- All ladders will be tied off on top, blocked or otherwise secured to prevent movement before work.
- All ladders must have a minimum width of 12”. All ladders must have a distance of 12" between rungs.
- The company prefers not to use or issue chain ladders, however if a client provides or mandates chain ladder usage, a thorough pre-use inspection of the ladder(s) must be performed. When there is a need for this type of ladder, wire rope ladders are preferred.
- Stepladders shall not exceed 10 feet without special training, and in no event, 20 feet in length.
- Extension ladders shall be equipped with positive stops.
- Ladders shall be maintained in good condition.
- Only one employee is to work on or climb a ladder at the same time.
- All work done from a ladder shall be within an individual’s normal reach and with no overextension.
- All work done from a ladder that exposes a worker to a fall potential of 6 feet or more requires the worker to wear a harness and be tied off per the Fall Protection Policy. Employees are not permitted to stand or work off of the top three rungs or cleats of a ladder unless there are members of the structure that provide a firm handhold, or the employee is protected by personal fall protection.

SAFETY DISCIPLINARY POLICY

MMI believes that a Health and Safety Program is not fully effective without some type of disciplinary policy. In order to maintain a safe and healthful workplace, the employees must be aware of and follow all Customer, company, State, and Federal safety and health regulations as they apply to the specific job duties required. Depending on the severity of the violations of this Policy, the following disciplinary actions, among others, may be taken for violation of health and safety requirements:

1. A verbal discussion between company supervision and the employee.
2. A written summary of the violation with recommended actions.
3. A formal disciplinary write-up with a copy added to the employee's personnel folder.
4. A disciplinary write-up with suspension (paid or unpaid)
5. Termination of employment for cause.

If an employee of this company knowingly and willingly violates any of the safety rules or procedures, or puts his/her self in an imminent danger situation, the employee will be immediately discharged.

MMI will offer return-to-work opportunities to all injured employees in accordance with and subject to work restrictions identified by the health care provider. The above descriptions and/or recommendations are for general guidance only and should not be relied upon for medical or legal purposes. They are solely for general information purposes. We do not make any warranty, expressed or implied, that our Customer's workplace is safe or healthful or that it complies with all laws, regulations or standards. This Manual is not a contract, is not binding on the Company, and may be changed at any time by MMI without notice.

Job Orientation Guide

Company: McGinley Maintenance Inc. Employee:
Trainer: Hire Date:
Date Position:

Check After Review

- 1. Explain the company safety program, including:
 - Orientation – SAFETY FIRST ! _____
 - On-the-job training _____
 - Safety meetings _____
 - Accident investigation _____
 - Disciplinary action _____
- 2. Use and care of personal protective equipment (gloves, etc.) _____
- 3. Line of communication and responsibility for immediately reporting incidents.
 - A. When to report an injury _____
 - B. How to report an injury _____
 - C. Who to report an injury to _____
- 4. General overview of operation, procedures, methods and hazards as they relate to the specific job. _____
- 5. Emergency plan
 - A. Exit location and evacuation routes _____
 - B. Location of First Aid _____
 - C. Specific procedures (medical, chemical, etc.) _____
- 8. Vehicle safety _____
- 9. Personal work habits
 - A. Safety is the First Job – before all others _____
 - C. Importance of Paying Attention / No Shortcuts _____
 - D. Smoking policy – No Smoking on the job-site _____
 - E. Good housekeeping practices _____
 - F. Proper lifting Techniques _____
 - G. Slip and Fall Avoidance _____

Date: _____ Signature: _____

APPENDIX 2

JOB SAFETY ANALYSIS FORM

TITLE OF JOB OPERATION: _____ Date: _____

Title of person who does job: _____

Employee observed: _____ Location: _____

Analysis made by: _____ Analysis approved by: _____

Sequence of basic job steps	Potential accidents or hazards	Recommended safe job procedures

Personal protective equipment required for this position:

Other hazards that may develop and will be addressed in our safety meetings:

Hazard Communication Program (Summary)

General:

It is the Policy of McGinley Maintenance Inc. to facilitate a safe and healthy workplace for all employees including those who work with potentially hazardous chemicals. This written program will be posted and available 24 hours a day, seven days a week at all Customer locations where the materials are used and at the Company's headquarters where materials are inventoried. If you work with or around potentially hazardous chemicals, this program affects you. The HAZARD COMMUNICATION STANDARD is intended to inform you of any potential chemical hazards from products you may come in contact with at this facility.

Container Labeling:

All containers of chemical products received at this company and all containers used as secondary containers will contain a label listing their hazards, both physical and health hazards. If the label is missing, contact MMI Safety Committee (800-624-6826) so they may determine what the product is that has been received, and where it should be stored. **DO NOT ATTEMPT TO USE ANY CHEMICAL THAT IS NOT READILY IDENTIFIABLE.**

Material Safety Data Sheets:

Karin Watson, VP HS&E and Tammy Greco, Administrative Assistant, have the SDSs on file from the various chemical manufacturers for all hazardous chemicals used in connection with this workplace. The SDSs list, in English, information available about any particular chemical: health hazards, emergency and first aid procedures, how the chemical could enter the body, the safe handling and use of the chemical, name of manufacturer, etc. The SDS file may be found in these locations: all janitor/storage locations at all Customer facilities and MMI's office.

Employee Training and Information:

A supervisor will provide training to new hires on the proper use of chemicals and hazards. Training may include:

1. Hazardous chemicals present in the workplace; How to read the labels.
2. Location of various chemicals. What to use. What to avoid.
3. Emergency procedures in case of contact with hazardous chemicals.
4. Location of the SDS files and how to read the SDS (Safety Data Sheets).
5. Non-routine tasks that may be encountered.
6. Symptoms of overexposure and personal protective measures to be used.

See SDS (Safety Data Sheets) at all Work Locations, Company Headquarters, and on-line at Betco.com

APPENDIX 4



MMI - SUPERVISOR'S SAFETY INCIDENT REPORT ("12 Hour Form")

Instructions:

- 1. Call Karin Watson (724-350-4600) as soon as you learn of the injury or safety incident.
- 2. As soon as possible - but within 12 hours of the incident - contact the employee and fill out this form.
- 3. Return the form as soon as possible – fax the completed form to 724-483-5569 or email to: karin@mcginleymaintenance.com.

EMPLOYEE INVOLVED IN THE INCIDENT:

Employee Name: _____ Employee DOB: _____
Employee Address: _____ Employee Hire Date: _____
Last 4 digits of Employee SS# _____ Employee Work Location: _____
Employee Phone # _____ Hours Worked: _____

INCIDENT INFORMATION:

Date Incident Occurred: _____ Specific Time Incident Occurred: _____
Location of Incident (specific) _____
Referred to Med Express or Hospital – facility name, address / Doctor's name: _____
Customer Notified? - Name/Date of Person Notified _____
- Notice was Provided By _____
- Drug Test Performed? - Yes / No – if yes, describe who, when, where: _____

DETAILED DESCRIPTION OF INCIDENT:

WITNESSES/INTERVIEWS CONDUCTED – NAMES/CONTACT INFO: _____

COMPLETE AND RETURN (as soon as possible – no later than 12 hours after learning of incident):

Supervisor Name (print) _____
Supervisor Signature _____
Date of this Report _____ Date Report Returned: _____

DRUG FREE WORKPLACE

McGinley Maintenance Inc. maintains a strict drug-free work environment and has zero tolerance for any violation of this Policy. MMI works in conjunction with third party providers (including Instant Technologies, Inc.) and performs mandatory drug testing on every new employee.

Pre-hire testing is performed as well as random drug testing for existing employees. MMI drug screens tests for the use of illegal substances - 10 Panel Drug Screen:

- Cocaine
- Marijuana
- Opiates/Morphine
- Amphetamines
- Methamphetamine
- Phencyclidine
- Benzodiazepine
- Barbiturates
- Methadone
- Tricyclic Antidepressants
- Oxycodone
- Propoxyphene

To support our overall safety programs, employees are not hired (or terminated if already hired) as result of any violation of our Drug Free Workplace Policy.