**COMPANY SAFETY POLICIES AND PROCEDURES**

**Piedmont Service Group's Vision and Mission**

**Piedmont Service Group**

**Vision Statement**

To bring value to our customers and

employees by proactively providing

unparalleled service and communication

with integrity, honesty,

and professionalism.

**Piedmont Service Group**

**Mission Statement**

Be the leading provider of technical

facility services and energy efficiency

solutions to building owners and

managers. We will exceed our

 customer's expectations by

consistently delivering superior

customer service and technical

competency. We are committed

to providing a safe, positive and

engaging workplace for employees

and their families.

**Piedmont Service Group**

**Culture Statement**

Piedmont Service Group makes the commitment to meet the objectives of their Vision and Mission statements by:

 \* Training, coaching, and empowering our employees to be fully engaged in a culture that promotes safety.

 \* Maintaining a high level of professionalism through a respectful and open culture.

 \* Encouraging local community involvement by each branch office.

 \* Promoting an open-door work environment.

 \* Always doing the right thing for both our internal and external customers.

 \* Meeting our business obligations while retaining a courteous and family friendly culture.

 \* Having a collaborative workforce that utilizes the diverse talents housed at each of our branch offices.

 \* Consistently providing quality work through:

 √ Cleanliness at each jobsite

 √ Timely responses

 √ Always doing what we say

 √ Providing feedback to the customers throughout the life cycle of a project

 √ Showing gratitude towards our customers

 √ Employing a skilled workforce that places value in on-going training and skills development

**Program Objectives and Goals**

The most important component of Piedmont Service Group's safety program is clearly written safety objectives and goals. In this regard, the following objectives and goals have been established to ensure the effectiveness of the overall safety program.

**Objectives:**

 •Provide a commitment from leadership that safety is a core value of the organization and will be given equal consideration in all business decisions.

 •Establish procedures to hold all employees accountable for their safety performance just as they are for other assigned responsibilities.

 •Establish uniform procedures for pre-construction safety planning.

 •Provide a line of communication throughout the organization regarding safety issues including decisions related to hazard control, accident investigations, inspections, and all other site safety activities.

 •Establish uniform safety training requirements to enable employees to make appropriate decisions pertaining to regulatory requirements, company policy, and practical safety issues.

 •Establish a uniform new employee orientation program for all company employees, as well as site-specific orientation programs for subcontractors.

 •Establish procedures to ensure frequent and regular safety inspections as well as abatement assurance.

 •Establish accident / incident / near miss reporting and investigation procedures in which root causes are determined and corrective action is taken to prevent future losses.

 •Establish procedures by which safety policies are reviewed for effectiveness, compliance, and practicality.

**Goals:**

 •Establish a “Beyond Zero Accident” culture throughout the organization.

 •Provide for full participation in the safety process from all levels of the organization.

 •Prevent occupational injuries and illnesses by eliminating or significantly reducing hazards at every opportunity.

**Responsibilities**

For our program to be effective, responsibilities and accountability will be incorporated and clearly understood. We have structured this safety program accordingly and assigned responsibility and accountability into the various positions.

**President:**

Piedmont Service Group's values, goals, and objectives stem from, and are promoted, supported, nurtured, and ultimately enforced through, these leadership positions. The President sets the tone and standards by which all subordinates operate. The primary responsibilities of the President under this program are:

 •Promote safety performance, at every opportunity, as a core value of the organization, equal to all other business considerations.

 •Ensure that resources are made available to support the safety performance of the organization.

 •Review and approve policies, procedures, and practices necessary to ensure the safety performance of the organization.

 •Hold all subordinate positions accountable for their performance under this program.

**Vice President/General Manager:**

 This position leads the “projects” aspects of the organization, and as such, must also promote, support, nurture, and enforce all aspects of the safety program. He must ensure that safety is instilled as an organizational value through his/her communications and actions. The company Vice President/General Manager is accountable to the company President. His primary responsibilities under this program are:

 •Promote safety performance, at every opportunity, as a core value of the organization, equal to all other business considerations.

 •Ensure resources are made available to support safety at the project level.

 •Consult with the Safety Director on matters of policies, procedures, and practices.

 •Hold all subordinate positions accountable for their performance under this program.

**Safety Director:**

This position is the catalyst of the safety program. He develops, implements, monitors, and reviews the effectiveness of the company safety program. The company Safety Director is directly accountable to the company President. His primary responsibilities under this program are:

 •Promote safety performance, at every opportunity, as a core value of the organization, equal to all other business considerations.

 •Develop, implement, monitor, and review company safety programs, and submit such to the President for review and approval.

 •Be familiar with and receive training on current federal and state OSHA regulations and owner requirements as necessary to provide assistance to each job site and work area.

 •Provide safety approval for protective clothing, tools, machinery, and testing equipment. Ensure appropriate maintenance on any testing equipment.

 •Conduct frequent and regular job site safety audits. Stop work immediately if imminent danger exists.

 •Review safety inspections completed by Supervisors, Project Managers, and third-party entities, and follow up on corrective actions.

 •Participate in any regulatory inspections and review, address, and defend all alleged regulatory violations.

 •Ensure that all employees receive and maintain safety training appropriate to their job responsibilities.

 •Evaluate employee attitudes, opinions, and overall awareness pertaining to this program. Enforce safety program compliance with corrective action in accordance with the Disciplinary Policy.

 •Assist pre-construction and estimating departments with project pre-qualification packets, client contract reviews, and subcontractor pre-qualification to identify potential risk as well as develop risk mitigation solutions.

 •Oversee, monitor, and ensure the completeness and accuracy of accident reports and investigations.

 •Coordinate and monitor the medical treatment of injured employees and the return-to-work program. Communicate with insurance carriers on all claims and work with the Project Manager in resolving, mitigating, and defending such claims.

 •Direct and enforce the company’s Substance Abuse Policy.

 •Administer the company’s Safety Recognition Program.

 •Collect, analyze, and maintain records of safety statistics, and maintain injury/illness/exposure records.

**Estimators:**

Estimators prepare the budget and conduct the initial planning phases of the projects. They are responsible and held accountable for ensuring that safety is included in this phase. The Estimator is directly accountable to the General Manager/VP, and their primary responsibilities under this program are:

 •Ensure that each project is equipped with a sufficient safety budget to provide the funds for equipment, materials, and personnel to perform the work safely and maintain compliance with company policies as well as regulatory agencies.

 •Review with the Safety Director any plans or specifications that may be of special safety concern.

 •Communicate owner/client and PSG safety, health, loss control, and environmental procedures to the project team and subcontractors.

 •Pre-qualify all subcontractors and vendors regarding their safety record and required safety programs.

 •Assist in the pre-construction conference to ensure that all safety concerns are addressed so that subcontractors clearly understand their safety obligations regarding the signed contract.

**Sales Representatives:**

Those involved in promoting and selling our service are often the first person our client meets.

They report directly or indirectly to the General Manager. They are responsible to ensure the

service they are selling will not put our workers in a hazardous environment or situation. Their

primary responsibilities are:

 •Promote safety performance, at every opportunity, as a core value of the organization, equal to all other business considerations.

 •Be familiar with and understand the application of Piedmont Service Group’s policies as stated in this manual.

 •Ensure that each project or potential contract does not contain hazards that will injure our employees.

 •Must be familiar with and understand what is required by agencies such as OSHA, EPA, NFPA, NEC, etc.

 •When questions arise as to hazards and their controls, the Safety Director will be contacted.

**Project Managers:**

The Project Manager is the figurehead of the project and must visibly promote, support, nurture, and enforce all aspects of the safety program through his actions and words. The Project Manager is ultimately accountable for the safe conduct of operations on his respective sites and is directly accountable to the General Manager/VP. The primary responsibilities of the Project Manager under this program include:

 •Promote safety performance, at every opportunity, as a core value of the organization, equal to all other business considerations.

 •Ensure the adequate and efficient use of resources to support the safety function at his respective projects.

 •Be familiar with, understand, and enforce the requirements of OSHA regulations and requirements, PSG and project-specific safety regulations and requirements, as well as other pertinent and accepted safe work practices.

 •Conduct a pre-construction conference with the owner, architect, and/or subcontractors to identify any safety concerns and issues throughout the pre-construction process and provide documentation of such to the Site Superintendent and Safety Director.

 •Conduct monthly safety inspections and submit the inspections to the company Safety Director. Stop work immediately if imminent danger exists.

 •Monitor subcontractors’ compliance with the company safety program and initiate correspondence to subcontractors concerning unresolved safety concerns.

 •Review results of all job site safety inspection reports and follow up to ensure prompt action has been initiated and completed to correct unsatisfactory conditions and work practices.

 •Participate in all accident investigations that involve their respective projects and investigate and assist the Safety Director in the handling of insurance claims on their project.

**Project Supervisor/Foreman:**

In a construction management environment, the Supervisor/Foreman play a crucial role in the implementation of the safety program. He works with the client and subcontractors to plan and perform the work as safely and efficiently as possible. The Supervisor/Foreman is responsible for planning and coordinating the work so that hazards are identified as early as possible, and that they are abated in a responsible and efficient manner. The Supervisor/Foreman is accountable for site safety and reports directly to the Project Manager. The primary responsibilities of the Supervisor/Foreman under this program include:

 •Promote safety performance, at every opportunity, as a core value of the organization, equal to all other business considerations.

 •Be familiar with, understand, and enforce the requirements of OSHA regulations and requirements, PSG and project-specific safety regulations and requirements, as well as other pertinent and accepted safe work practices.

 •Be accountable for and hold employees and subcontractors under his/her charge accountable for the safe execution of projects.

 •Obtain a copy of each subcontractor’s safety manual, hazard communication program including SDS, OSHA 10-hour cards, and other special programs that may be required by OSHA/ PSG /owner prior to starting that phase of work.

 •Be sure all safety signs are posted and maintained in a clear and legible condition.

 •Conduct weekly safety meetings with all PSG employees and subcontractors under their control. Document these meetings and submit documentation to the Safety Director. (Construction-weekly Toolbox Talks, Service-monthly safety meeting).

 •Monitor and abate all unsafe working conditions immediately upon discovery and ensure that the situation is resolved appropriately. Stop work immediately if imminent danger exists.

 •Train employees under their control on the safe and efficient way to perform an assigned task by using a Job Hazard Analysis and procure and maintain all necessary safety equipment needed to perform the work safely.

 •Forward all worthwhile requests, suggestions, and complaints regarding safe working conditions to the immediate supervisor or the Safety Director.

 •Report all safety incidents, including near misses, immediately and complete all necessary forms in accordance with the Incident Investigation Policy.

 •Attend all required safety training as mandated by this program and/or instructed by the Safety Director.

 •Follow-up on recommendations and abate safety violations that were noted in inspection reports by the Safety Director, insurance company, and/or regulatory agencies.

**All Employees:**

Each employee is accountable and held responsible for their actions and/or inactions pertaining to safety. All employees are responsible for the following:

 •Promote and implement safety performance, at every opportunity, as a core value of the organization, equal to all other business considerations.

 •Strict adherence to all regulatory and company policy work rules, regulations, and posted signs, as well as established safe work practices.

 •Report any unsafe working conditions at once to the immediate supervisor or Safety Director; Stop work immediately if imminent danger exists. (See Stop Work below)

 •Report **all** accidents and “near miss” situations immediately to the immediate supervisor or the Safety Director and participate in and cooperate with any safety incident investigations.

 •Report all possible personal injuries **immediately** during the work shift when the incident occurs.

 •Attend all required safety training as mandated by this program and/or instructed by the company Safety Director.

 •Conduct only those tasks in which he/she has received training and fully understands the safety requirements of the task.

 •Use the required safety equipment and personal protective equipment provided when necessary. Keep all work areas clean and orderly.

 •Learn to recognize unsafe conditions and procedures on the job site. If asked to do a task that he/she considers unsafe, one may question the supervisor without fear of reprimand; if still in doubt, contact the Safety Director.

 •Participate in the creation of the Job Hazard Analysis and then follow the controls listed to mitigate the hazards.

 •Be familiar with the Emergency Action Plan for your job location and respond accordingly in case of an emergency.

 •Understand that violations of this policy will be cause for immediate disciplinary action, up to and including termination.

**Communication**

Without a good system for communicating health and safety information, plans for our injury and illness prevention system would fail. Good communication allows us to stay in touch with the workforce, so that we are constantly aware of health and safety needs throughout our operations. If we are communicating properly, our goals and rules are clearly understood, and potential hazards are eliminated before they become harmful. With that in mind, we have developed a variety of ways to communicate our safety and health program:

**Open Door Policy:**

Piedmont Service Group maintains an open-door policy at all levels of the organization so that ideas and concerns flow freely from leadership to employees and vice versa. It is important for all employees to feel free to bring their safety concerns or suggested safety improvements to any level of management. If any individual feels this method is not receiving the necessary attention, they should speak directly to the Safety Director. Communications regarding safety related issues can always be made without fear of discrimination or retribution.

**Policy Changes:**

Any changes to company safety policies will be communicated to all affected employees via e-mail, memo, or other written communication. In the case of significant changes, training will be provided in a timely manner though conference calls or on-site meetings. Questions pertaining to these changes should be directed to the Safety Director.

**Training**

The key to this safety program and accident prevention is the training of each employee. This policy sets forth the minimum training requirements required of employees to enable them to make sound decisions as they pertain to their work scope and environment.

Piedmont Service Group Safety Director is responsible for overseeing all facets of this program and has full authority to make decisions necessary to ensure it success. He will review the program annually for effectiveness and will provide the President with alternative measures in areas of deficit.

All new hires will be mentored for at least 30 days or until they are qualified to work on their own.

**New Employee Safety Orientation:**

A New Employee Safety Orientation is a part of the overall orientation program that all new hires must participate in. This orientation is conducted by the Safety Director, or a person appointed by him, and shall include the following topics:

Company’s Safety Policy Statement Safety Policy Goals and Objectives

Safety Responsibilities Accident Reporting Procedures

Substance Abuse Program Disciplinary Policy

General Safety Rules Blood-borne Pathogens

Hazard Communication Fall Protection

Upon completion of this training, the *Employee Safety Orientation Form* concerning the policies and programs must be completed and retained on file at the main office.

**Project Safety Orientation:**

In addition to the general orientation, all employees assigned to a job site, subcontractors, and visitors will receive a site-specific Project Safety Orientation. This orientation will be conducted by the Foreman and will include the following:

Location of SDS and First Aid Kit Emergency Action Plan

Emergency Phone Numbers Incident Reporting

General Project Safety Rules Hazards Particular to the Project

**First Aid and CPR Training:**

All Supervisors/Foreman shall be trained in First Aid/CPR/AED that is equivalent with the training prescribed by the American Red Cross or the American Heart Association. First Aid/CPR/AED training will also be made available to other employees upon request and as required by other sections of this manual. (For example-NFPA 70e) For a life-threatening emergency, 911 will be called and the worker transported in an ambulance. For non-serious injuries, the worker can be transported in a company vehicle to the predesignated facility.

All vehicles shall be equipped with a first aid kit that meets the current OSHA standards. They will also contain an eye wash. They will be inspected monthly at a minimum to ensure they are properly stocked, and no items have expired.

For our construction projects, all the above applies and a first aid kit will also be kept at the job trailer or toolbox. The size and contents will depend on the number of workers present. If there is a chance of a task causing objects to get in the eyes, a wall or stand mount eyewash will be available.

**OSHA 10-Hour Construction Outreach Training:**

All supervisors, including, but not limited to, job site Superintendents, Project Managers, Estimators, and the site Safety Managers, shall complete the OSHA 10-hour Construction Outreach Training.

**Annual Safety Training:**

In addition to the OSHA 10-hour Construction Course, PSG will hold supplemental safety training for all Superintendents, Project Managers and Employees, as needed. This training may include, but is not limited to, fall protection, trenching and excavation, scaffolding, lock-out/tag-out, PPE, stairways and ladders.

**Monthly Safety Meetings:**

PSG will conduct regularly scheduled Monthly Safety Meetings (Toolbox Talks). The safety meeting topic shall be selected by the Supervisor/Foreman and shall be relative to the hazards associated with the current project and scope of work. Each attending employee and subcontractor shall sign the safety meeting sheet and a copy of the safety meeting and sign-in sheet shall be given to the Safety Director. On occasion the Safety Director will pick topics that are of special interest for all to discuss.

**Task Specific Training:**

PSG shall conduct or provide task-specific training for employees as required by the applicable OSHA standards and as deemed necessary for the safe conduct of our operations.

**Recordkeeping:**

All training documentation shall include a training attendance roster and a copy of the course curriculum. Training records shall be forwarded to the company Safety Director and will be maintained in the employee’s individual training file.

**Stop Work Authority:**

• All Employees have the authority to stop work if the work area or task is unsafe.

• All Employees can stop work if they do not understand how to control the hazard.

• All Employees are shown how to stop work and document with the SOR tool on their phone.

• All Employees are required to notify their manager if they stop work because it is unsafe.

• Work will not resume until it can be performed safely.

• The Employee is free from retaliation if work is stopped because it is unsafe.

• The steps for this process are 1) Stop 2) Notify 3) Correct 4) Resume work.

• These steps will be implemented by the Service Manager and using the Safety Director as a resource. The importance of this process from start to finish means that all go home safely and a Beyond Zero culture is created and improved.