

SIERRA WES WALL SYSTEMS, INC.

INJURY AND ILLNESS PREVENTION PROGRAM

The objective of the occupational safety and health program is to provide a safe and healthful work environment for workers. The goal and first consideration of Sierra WES Wall Systems, Inc., is to meet this objective and provide a safe and healthful environment for our employees.

We are committed to maintaining a safety and health program, which places the personal safety of our employees at primary importance. Prevention of occupational injuries and illness will be given precedence over operational productivity whenever necessary.

Your cooperation in detecting hazards for correction and also controlling work hazards is a condition of your employment. Inform your supervisor immediately for the correction of any hazardous situation beyond your control, do not expose yourself to the hazard, not undertake any task that you are not trained or authorized to perform.

Our objective is a safety and health program, which reduces occupational injuries and illnesses to an absolute minimum, even surpassing the industry standard for operations similar to ours. Our goal is zero accidents and injuries.

Our injury and illness program include:

- Providing mechanical and physical safeguards for maximum protection wherever needed.
- Safety and health inspections to identify and eliminate jobsite hazards and unsafe work practices.
- Training all employees regarding safe work practices and occupational hazards.
- Training all employees on our Emergency Action Plan, including the availability of first aid kits, fire extinguishers, and appropriately trained first aid personnel at each jobsite.
- Providing necessary personal safety equipment and instruction to employees exposed to work area hazards and the specific conditions under which they are to safely perform their job.
- Safety and health policies along with procedures for enforcement of these policies.
- Accident investigation to immediately determine the cause, for correction and prevention a similar accident.
- A Safety suggestion program readily available to all employees.

We understand safety and health responsibilities must be shared. Accordingly, the following people are responsible for:

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- The Safety Manager –accepts responsibility for implementing and leading a safety and health program as well as providing any necessary protective equipment to ensure a safe workplace.
- Production Managers in each market (U.C, Sac, NV, TM) accepts responsibility for creating a positive attitude among employees toward the safety and health program of Sierra WES Wall Systems, Inc. They are to ensure all operations are performed safely for the protection of all employees involved.
- The area Foremen are responsible for site safety visits, tailgate trainings, and safety and performance write ups.
- The employee accepts responsibility for whole-hearted support of the company health and safety program. This includes compliance with all policies and procedures while continually practicing safety in performing work duties and reporting and avoiding all unsafe conditions, including those which he/she may be unsure of or not trained and authorized to perform.
- LaVonne Holloway accepts responsibility for filing all claims with the Worker’s Compensation carrier and proactively managing each claim in tandem with the assigned adjuster. This also includes enforcing our Return to Work Program.

The components of our illness and injury prevention program are as follows:

A.) IDENTIFICATION OF AUTHORITY

A necessary part of the program is to assign authority and responsibility to an individual within our company to effectively implement our program. This authority has been assigned to LaVonne Holloway, Safety and Workers Compensation Specialist, Sierra WES Wall Systems, Inc. Any questions or suggestions you have regarding this program, which cannot be addressed by your supervisor, are encouraged.

B.) COMPLIANCE WITH SAFE WORK PRACTICE

1. **Safety Meetings and Training:**

In order to help ensure compliance with safe and healthful work practices, Safety Tailgate Meetings held by an Area Foreman or Team Lead for each crew will be held every other Friday.

Attendance at the safety meetings is mandatory for all employees other than the front office and standby personnel.

General training will be incorporated into the safety meetings. Subjects such as lifting, housekeeping, material handling, defensive driving, etc., will be addressed at meetings using any materials and visual aids that may be appropriate.

Specific training regarding safe handling, installation, or construction procedures applicable to the job shall be completed at this time. Documentation of this training is to be submitted to the Production Manager (General Manager) for each region.

Periodic meetings of supervisory employees will be held under the direction of the Safety Manager for the discussion of safety problems and accidents that have occurred.

2. **Disciplinary Action:**

All employees are expected to follow the Sierra WES Wall Systems, Inc., Code of Safe Practices and the Sierra WES Wall Systems, Inc. Safety Policy. Failure to comply with this policy will result in disciplinary action as outlined within Sierra WES Wall Systems, Inc. (Specific Progressive Discipline Policy and Specific Policy on disciplinary situations that may lead to immediate dismissal)

3. **SWWS Safety Audit:**

SWWS Management team will conduct random safety audits. If you are found in compliance you receive a safety sticker. If you are found violating the safety policy you will be disqualified from the current bingo game session and you will receive a safety violation. The consequences for safety violations are as follows:

1st violation - Verbal - This is documented and we ask you sign the document showing that you acknowledge the conversation took place. One copy goes to you and the other is filed.

2nd violation - Written - This is documented and we ask that you sign the document showing that you understand this is your second warning. One copy goes to you and the other is filed.

3rd violation - Written - This is documented and we ask that you sign the document showing that you understand this is your third warning. You are required to come into the office and review the safety policy and safe practices with the management team. You will be re-issued the company safety incentive documentation as well as our safe practices documentation. One copy of your violation and safety compliance goes to you and the other is filed.

4th violation - Written and suspension 1 work day without pay. We ask that you sign the documentation and exit the work site immediately upon supervisor action and documentation. Upon your next valid work day, you are required to come into the office and review the safety policy and safe practices with the management team. You will be re-issued the company safety incentive documentation as well as our safe practices documentation. One copy of your violation and safety compliance goes to you and the other is filed.

5th violation - Written and suspension 1 work week without pay. We ask that you sign the documentation and exit the work site immediately upon supervisor action and documentation. Upon your next valid work day, you are required to come into the office and review the safety policy and safe practices with the management team. You will be re-issued the company safety incentive documentation as well as our safe practices documentation. One copy of your violation and safety compliance goes to you and the other is filed. THIS IS YOUR FINAL WARNING

6th violation - TERMINATION - You will be required to exit the work site immediately and return to the office. You will be required to return all company equipment, material, and property before your final check is issued.

Note: There will be retraining after all disciplinary actions.

4. **Safety Recognition and Awards: (See attached)**

As an incentive to promote safe work practices within our company and to recognize outstanding safety accomplishments by our employees, a safety awards program has been established. The Safety Incentive Program rewards employees who properly use all safety equipment, i.e., Personal Protective Equipment (PPE). Such equipment includes, but is not limited to, hard hats, safety glasses, water jug, and fall protection. Incorporated into this program is safety bingo rewards.

C.) COMMUNICATION

It is important for us to communicate matters related to occupational safety and health to all employees. Communication must be in languages understandable by every employee.

It is encouraged within our company to report any hazard existing in the workplace to an immediate supervisor. No reprisal will result to an employee who reports hazards for the well-being of other company employees; and, in fact, a commendation may be placed in the employee's file.

The following methods will be used to communicate health and safety issues to our employees:

- ❑ Safety tailgate meetings, including training programs (hassock, first aid, proper lifting, etc.).
- ❑ The Area Forman is responsible for completing an onsite safety report via "NestForms." This procedure enables the foremen to identify real time dangers and train / retrain real time on the job with line level employees and field workers.
- ❑ Posting safety codes and posters.
- ❑ Distribution of safety and health information.
- ❑ Communication between management, supervisors, foremen at meetings, by formal reports and suggestions, and/or on-the-spot as the need arises.

D. HAZARD IDENTIFICATION

The identification and evaluation of workplace hazards is important in maintaining a safe work environment. The following procedures will be used for effective identification and evaluation of these workplace hazards:

Work Area Safety Inspections:

A jobsite inspection at each jobsite will be conducted by an assigned supervisor or foreman to identify unsafe conditions and work practices. All noted hazards shall be communicated in via Nestforms for immediate correction depending on severity. An inspection report will be completed and returned electronically for review by the Safety Manager for follow-up and Safety and workers comp specialist.

Hazard Inspection Checklists will be reviewed to determine whether new criteria need to be added, and all areas where that criteria may be applicable will be re-inspected whenever a hazard is identified.

Vehicle/Equipment Inspections:

An inspection of all equipment and vehicles will be overseen monthly by Carl Haupt. All noted hazards shall be communicated in writing to the vehicle/equipment operator for immediate correction depending on severity. An inspection report shall be completed by the fifth of each month and returned to the Safety Manager for follow-up. Operators will check their vehicle each time before it is used.

Identification and Evaluation:

An identification and evaluation of potential hazards will be made by the Safety Manager whenever a new substance, process, procedure, or new piece of equipment is introduced into the workplace, which represents a new occupational safety and health hazard.

New or Unrecognized Hazards:

An identification and evaluation procedure will also be completed by Safety Manager whenever a new or previously unrecognized hazard is revealed.

Recurring Hazards:

An identification and evaluation procedure will minimize recurrence by looking for “hidden causes” by implementing communication and remedial training and by presuming that all accidents are preventable.

Non-Routine Tasks:

An identification and evaluation procedure will be conducted by all personnel to identify non-routine, periodic tasks requiring communication or training prior to be undertaken.

Loss Analysis:

The monthly Loss Analysis reports from Zurich North America will be reviewed for trends in injury and accident type.

“Flow Chart”:

The hazard identification “flow chart” will be referenced whenever a hazard is identified.

E. INJURY/ILLNESS INVESTIGATION

Occupational injury and illness investigation are an important part of this program. All occupational injuries and illnesses are to be reported in writing to the Supervisor/Team Lead within 24 hours of their occurrence. In addition, an injury and illness investigation report

regarding causes and suggestions for corrective action shall be completed by the Supervisor/Team Lead on any accident that may have caused injury or damage. This report shall be given to Safety and workers Comp Specialist immediately upon notice of an injury. The procedure used for injury and illness investigation and report is contained within the Sierra WES Wall Systems, Inc. Safety Manual.

F. CORRECTION OF UNSAFE/UNHEALTHY CONDITIONS

Timely correction is required upon identifying and evaluating unsafe or unhealthy conditions, work practices, or work procedures. All employees are expected to correct any easily-corrected hazard once it is perceived. The procedure for correction of these unsafe or unhealthy conditions is as follows:

- All attempts must be made by employees to immediately correct hazards once observed or discovered. If the hazard is of a lesser degree of severity, a scheduled time for correction must be documented for follow-up by Safety Manager).
- When an imminent hazard exists, which cannot be immediately corrected, all exposed personnel must be removed from the area except those necessary to correct the existing condition. All affected personnel shall follow the direction of the supervisor to safely exit the location until the hazardous condition is corrected. Employees necessary to correct the hazardous condition shall be provided all necessary safeguards.
- Administrative procedures or the use of personal protective equipment may be otherwise implemented upon direction of management to effectively eliminate the hazard.

G. TRAINING AND INSTRUCTION

Training and instruction on subjects pertaining to safety and health is a necessary part of an effective safety program. Our company will conduct periodic meetings with employees under the direction of the Safety Manager for the discussion of safety problems and accidents that have occurred. This is in addition to tailgate meetings at least twice a month.

Meetings will serve as the primary basis for training and instruction for safety-related matters to our employees. At times, special training and instruction may be required on a contingency basis. The following areas of training will be addressed:

- At the time of employment, all new employees will be trained and/or given instruction regarding the safety policies of the company by the safety Manager. This training and instruction shall also include any special training necessary for hazards inherent to the employee's individual duties. (Documents signed by the employee and trainer will be maintained for a minimum of one year.)
- All employees given new job assignments for which training has not previously been received will be trained by their supervisor. This training is to ensure hazards associated with the new job assignments along with proper safety procedures have been properly communicated to the employee.

- Training and instruction are required at the time a new substance, process, procedure, or piece of equipment is introduced into the workplace, which represents a new hazard. This training shall be conducted by the safety director and will include training on non-routine tasks prior to being undertaken.
- Special training and instruction are required at the time the company is made aware of a new or previously unrecognized hazard; specifically, if the hazard cannot be corrected in a timely manner based upon its severity. The training and instruction to communicate this hazard shall be conducted by the Safety Manager.
- Training and instruction shall be provided for supervisors and foremen at the direction of the Safety Manager. Additional training will also be scheduled on an “as-needed” basis.
- This training is to familiarize supervisors and foremen with safety and health hazards to which employees under their immediate direction and control may be exposed.
- Training and instruction shall be provided on “traditional” occupation injury (“nemesis” injuries) whenever there is a recurrence or otherwise on a periodic need basis as identified by the Safety Manager.
- Training and instruction shall be provided by the safety director on all non-repetitive tasks prior to their being undertaken.

H. RECORDKEEPING

Records of the company’s inspection, training, and accident investigation will be kept at the company’s office and on file for a minimum of one year.

Records of the steps taken to implement and maintain our program include the following:

- Scheduled and periodic inspection, accident investigation, employee reports, Loss Analyses and OSHA 300 forms to identify unsafe work conditions and work practices. Our records will indicate the person(s) making the report, the unsafe conditions and work practices that have been identified, and the action taken to correct the unsafe conditions and work practices.
- Documentation of safety and health training. Our documentation shall include the name of each employee trained or other identifier, training dates, and initial training instruction checklist, and subjects discussed at subsequent training sessions and meeting.
- A communication and training log including dates of meetings, special presentations, posters, material, and audio/video aids.

I. SAFETY COMMITTEE

The mission of this committee is to have more employees actively involved in safety, to eliminate accidents, and to help create a corporate culture that embraces safety. The committee meets at least quarterly. The committee consists of individuals that:

- Complete facility inspections

- Review workplace accidents and review accident investigations
- Recommend corrective actions
- Express safety concerns
- Review and improve safety policies
- Suggest and coordinate safety training

J. Access to IIPP

Employees shall have access to this IIPP in a reasonable time, place, and manner, but in no event later than 5 business days after a written request for access is received from an employee or designated employee representative. Copies may also be produced upon a verbal request.

One printed copy of the IIPP will be produced free of charge unless the employee/representative requests a digital copy, in which case a digital copy will be produced via email.

A digital copy of the IIPP is also available on the company website at www.sierrawes.com.

This Injury and Illness Prevention program is Sierra WES Wall Systems, Inc. policy and is adopted to create a safe and healthful workplace for all employees.

