

# ***AWAIR Program***

## **POLICY and PROCEDURES MANUAL**



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## **AWAIR Program Policy**

The Berg Group is committed to providing a safe and healthful work environment for each employee while maintaining sound, profitable approaches to business solutions. We shall make every reasonable effort to safeguard our employees, customers, stakeholders, communities and the environment from risk inherent to our operation.

The Berg Group dedication to occupational safety and health requires our system for managing risk to establish standards of performance consistent with our commitment to continuously improve the processes of our operation. In order to more effectively reduce likelihood of workplace accidents and injuries, our management system has integrated A Workplace Accident and Injury and Reduction (AWAIR) program into each division in every state we operate.

Upholding the standards and values of our organization is a requisite of employment at The Berg Group. We believe education is paramount in our efforts to prevent the occurrence of accidents and injuries in the workplace. Our methods to identify, measure and control risk shall be effectively communicated to all affected employees. Managing safe work practices is performed by holding each employee accountable for the standards of performance we train them to. Should an accident occur, The Berg Group shall investigate the root cause of the incident in order to develop controls for preventing a repeated breakdown in our management system.

The Berg group AWAIR Policy outlines our procedures used to comply with the all regulations affecting our operations and describes employee practices for conformance to established standards. Any questions regarding The Berg Group policy and procedures should be directed to our Safety Director at 605-380-1161.

Randy Schneewind

\*\*\*SIGNATURE\*\*\*

CEO

The Berg Group

# **AWAIR Program**

## **SECTION 1: INTRODUCTION TO A WORKPLACE ACCIDENT AND INJURY REDUCTION**

In 1990, the State of Minnesota amended the Occupational Safety and Health Act, Minnesota Statutes (MS) Chapter 182, requiring employers in certain industries to develop written, comprehensive workplace safety and health programs. This legislation, MS 82.653, subd.8, is known as A Workplace Accident and Injury Reduction (AWAIR) Act and programs developed to comply with the act are known as AWAIR programs. The requirements of the act are as follows:

### **Work Place Programs**

The Berg Group has established a written AWAIR program to establish standards for safe and healthful working conditions. This program shall clearly define the goals and objectives of this organization. The contents of The Berg Group Policy and Procedure Manual meet the compliance requirements of the AWAIR program. The Berg Group written AWAIR program delineates:

1. How managers, supervisors and employees are responsible for implementing the program and how continued participation of management will be established, measured and maintained.
2. The methods used to identify, analyze, and control new or existing hazards.
3. How the plan will be communicated to all affected employees so that they are informed of work-related hazards and controls to reduce risk.
4. How work place accidents will be investigated, and corrective action implemented.
5. How safe work practices and rules will be enforced.

At a minimum, The Berg Group annually reviews the AWAIR program and documents how goals for the program shall be met. Detailed information about AWAIR programs is available at [www.doli.state.mn.us](http://www.doli.state.mn.us)

## **SECTION 2: GOALS AND OBJECTIVES**

The Berg Groups commitment to continuous process improvement begins with establishing annual goals and objectives for our AWAIR program, which are used to track, update and communicate our progress to all employees. Goals establish the direction for our initiatives and describe what The Berg Group wants to achieve in occupational safety and health. Objectives are the specific actions The Berg Group shall take in order to achieve our organizational goals.

**Goal 1: No OSHA Citations.**

Objectives:

1. The Berg Group shall regularly and routinely inspect jobsites to ensure activities are performed in a manner consistent with established safety standards.
2. Effectively train all employees to comply with all OSHA requirements and conform to The Berg Group safety standards.
3. Continue to integrate risk control activities into all company functions.

**Goal 2: Continue to invest in The Berg Group Employee Training and Development Program to further develop employee proficiency.**

Objectives:

1. Revise our new hire training program to effectively communicate and establish accountability-based standard practices and conditions in The Berg Group new employees.
2. Effectively train all new hires within 90-days of their date of hire.
3. Continue to integrate risk control into all company functions.
4. Implement a new Safety/Orientation video.

**Section 3: Roles and Responsibilities**

**Responsibilities**

This section of The Berg Group AWAIR Program outlines the responsibilities of every employee involved in the risk management process. The following sections delineate how managers, supervisors and employees are responsible for implementing the AWAIR program components. As well, it details how continued participation of management will be established, measured, and maintained.

## **Management**

The management team of The Berg Group shall actively participate in the processes to achieve organizational goals in occupational safety and health. The Berg Group management shall be accountable for the following responsibilities:

- Allocate the required resources for risk control.
- Make necessary appropriations to meet the requirements of an effective Workplace Safety Program.
- Include discussions on occupational safety and health issues at staff meetings and other appropriate occasions.
- Uphold and enforce organizational policies and procedures.
- Assure development of policies and programs to meet the legal requirements of the federal, state and local regulations.
- Utilize the appropriate controls.
- Delegate responsibility for occupational safety and health to front-line supervisory personnel.
- Enforce accountability and disciplinary action plan.
- Participate in the annual review of The Berg Group Workplace Safety Program.

## **Safety Director**

The Safety Director shall be responsible for the development and implementation of a comprehensive and effective Workplace Safety Program. The Safety Director is accountable for the following responsibilities:

- Develop, implement and maintain occupational safety and health policies and procedures for compliance with all applicable regulations.
- Provide uniform and consistent leadership on standards of acceptable work practices and jobsite conditions.
- Manage the administration of the Workplace Safety Program and coordinate all occupational safety and health activities.
- Develop and coordinate employee-training programs.
- Monitor the performance of the occupational safety and health programs to be aware of trends, loss potentials and overall progress/performance.
- Report all safety related matters directly to executive leadership.
- Identify controls to reduce and/or eliminate risk.

- Consult with representatives of insurance carriers to coordinate risk transfer services consistent with The Berg Group goals in risk management.
- Direct all accident, incident and injury investigations.
- Verify hazard controls are in-place, maintained and effective.
- Supervise the completion of necessary accident records. Assure prompt filing of required reports with the insurance carrier, federal, state and local authorities.
- Monitor medical reports and progress with employee injury/health.
- Monitor decisions made by Workers' Compensation carrier and make recommendations on a return to work programs or appropriate alternative action(s).
- Manage employee return-to-work programs.
- Be proficient on knowledge from applicable regulations on occupational safety and health from OSHA, the Department of Transportation (DOT) and other federal and state agencies affecting our operations.
- Establish and maintain a recordkeeping system meeting all regulatory requirements.
- Assist in the procurement and distribution of appropriate personal protective equipment and verify enforcement regarding its use.
- Ensure properly maintained and inspected tools, machinery and equipment is provided to our employees.
- Conduct regular and routine site inspections to identify and correct substandard practices and conditions.
- Advise employees on risk control techniques for equipment use, employee practices and jobsite conditions.
- Provide leadership to the Safety Committee.
- Assure new employees receive proper occupational safety and health orientation ensuring consistency of training regarding policies, procedures and related information.
- Maintain a library of current reference manuals and materials; maintain current safety related certifications such as OSHA 30-hour, competent person, etc.
- Attend risk control workshops/conventions to stay current on occupational safety and health issues effecting The Berg Group operations.
- Investigate and resolve all OSHA citations.
- Maintain central records for safety-related issues (i.e. jobsite safety meetings, Operator Qualifications, personnel training, etc.).
- Assure prompt filing of required reports with the insurance carrier, federal, state and local authorities.
- File first report of injury with insurance company.
- Maintain worker compensation files.

- Maintain OSHA 300 log.
- Distribute updated information on accidents, incidents and injuries.
- Assist with the Employee Return-to-Work Program.
- Schedule initial and follow-up appointments for injured employees.
- Coordinate drug tests with clinics.
- Coordinate medical services with clinics and providers.

### **Project Managers\Field Coordinators**

Managers are responsible for ensuring risk control is managed as equally as other targets in the operation. A critical component of a Manager's assigned tasks is to coordinate efforts for effective implementation, monitoring and enforcement of the Workplace Safety Program. The Manager is accountable for the following responsibilities:

- Enforce compliance with all federal, state and local regulations and conformance to all The Berg Group standards
- Risk control shall be incorporated in the planning of each stage of the project.
- Collaborate with the Safety Director to coordinate risk control activities pertaining to any unique or unusual safety-related concerns.
- Obtain required documentation pertaining to hazards on jobsites including lead, asbestos, utilities, confined space, traffic control or any other unique hazard.
- Ensure risk control activities are adequately accounted for in the budget and schedule.
- Collect all relevant and required information on accidents involving The Berg Group employees or property and promptly forward to the Safety Director
- Enforce subcontractor conformance to all The Berg Group standards.
- Conduct visual inspections of employee practices and jobsite conditions when onsite.
- Consult with the Safety Director if jobsite inspections determine additional controls are required to reduce risk, policy/procedures are in violation or to evaluate jobsite conditions.
- Take prompt corrective action on situations to reduce or eliminate risk.
- Provide written notification to owners or General Contractors on substandard practices and conditions outside of The Berg Group operational control.
- Effectively communicate and enforce specific job site or General Contractor required safety standards to Supervisors and Foreman.
- Request MSDS sheet when ordering material.
- Ensure safety is accounted for and budgeted in each bid.



## Field Coordinators & Foremen

The Field Coordinators and Foremen are a direct representation of The Berg Group organizational values to field personnel. Each has significant influence on the performance of the Workplace Safety Program as they directly oversee the practices and conditions onsite. These individuals are responsible for identifying jobsite hazards, developing effective solutions to reduce risk and ensuring safety is non-negotiable.

The Berg Group Workplace Safety Program operates on the premise that effective risk control is an essential component of efficiency and profitability in operations. Therefore, The Berg Group shall coach and train each Field Coordinator and Foremen in effective risk control strategies to reduce the likelihood of loss from inherent exposure. Field Coordinators and Foremen are held accountable for all accidents, incidents and injuries occurring on their jobsites. Each Field Coordinator and Foremen is accountable for the following responsibilities:

- Ensure each jobsite has the following:
  1. Employee Injury and Accident Investigation Reports.
  2. Emergency Contact List.
  3. Fire Extinguishers.
  4. First-Aid Kit.
  5. MSDS Accessibility.
  6. Required Personal Protective Equipment (PPE)
  7. Required Documentation and Records.
- Immediately notify the Safety Director of any accident, incident or injury.
- Nourish the organizational culture of occupational safety and health awareness.
- Maintain accountability of all employees on the jobsite.
- Monitor and enforce all of The Berg Group policies and procedures and all of The Berg Group standard practices and conditions.
- Ensure compliance to federal, state, and local safety regulations.
- Distribute appropriate personal protective equipment, enforce its use and routinely inspect its quality and maintenance.
- Coach all employees under their supervision in safe, acceptable working practices and job safety requirements.
- Conduct regular and routine site inspections to ensure compliance and conformance.
- Correct substandard practices and substandard conditions; the Safety and Training Manger will be contacted when the Supervisor or Foreman needs help to develop work practices or jobsite conditions to protect employee health and safety.
- Provide immediate care for anyone injured on his or her jobsite. Call 911 in the event of a serious injury.

- Ensure WorkPartners Triage contact information is distributed to The Berg Group employees and is utilized in the event of a work related non-life-threatening injury.
- Participate in the investigation of all accidents, incidents and injuries to determine the root cause of the event.
- Ensure all machinery, equipment and tools are only operated by authorized and qualified individuals and properly maintained in serviceable condition.
- Enforce company policy requiring equipment operators to inspect their equipment daily.
- Maintain good housekeeping practices always.
- Conduct weekly *Tool Box Talks* with employees under their supervision and turn the weekly training record in to the Safety Director weekly.

## Employees

Occupational safety and health is an integral part of each employee's daily tasks. Safe production is the goal of each employee. The Berg Group employees are held accountable for performing their tasks in accordance with all applicable regulations, company policies and established standards governing employee practices and jobsite conditions. Employees are accountable for the following responsibilities:

- Conform to all company policies and comply with all applicable federal, state and local safety regulations.
- Immediately report all accidents, injuries, incidents, DOT violations, anything and everything relating to an *Upset Condition*.

*Note: an Upset Condition is any situation, action or event you are involved in with likelihood of negatively affecting your personal or professional performance, your coworkers, the public, the environment, company reputation, equipment, vehicles or creating financial loss, liability or operational downtime. Everything shall to be reported to the Forman, Field Coordinator and the Safety Director immediately.*

- Tasks shall be performed in a manner consistent with ensuring your own safety, as well as the safety of co-workers and the public.
- Request assistance when uncertainty of conditions is present.
- Correct substandard practices or conditions within the scope of your responsibilities.
- Report all substandard practices or conditions to the Field Coordinator/Foreman regardless of the origin.
- Use and maintain all safety devices and personnel protective equipment provided – never alter or remove any safety device from equipment and never use any piece of equipment without the proper guards or personal protective equipment.
- Actively participate in safety-related activities such as weekly Tool Box Talks, safety meetings and employee training.

- Report ideas for improving our jobsite safety performance.
- Never perform a task that you are not trained or qualified to perform.
- Always wear required personal protective equipment during work hours.
- Wear the required PPE when engaged in identified tasks with likelihood of causing injury.
- Refuse to participate in substandard practices or work in substandard conditions until adequate controls are in place to control risk.

## **Subcontractors**

Subcontractors involved in The Berg Group operations act as independent contractors. Each is accountable for performing task specific responsibilities to comply with applicable federal, state and local regulations. As well, each subcontractor shall conform to The Berg Group policies and procedures governing risk control activities.

To ensure the quality of these activities, The Berg Group shall monitor and enforce conformance with established policies and procedures. The Berg Groups intent is to facilitate the highest level of quality in managing risk for the protection of all parties involved. The Berg Group holds each subcontractor accountable for the following responsibilities:

- Compliance to applicable federal, state and local regulations governing operations.
- Conformance to The Berg Group established risk control policies and procedures.
- Furnish all of their employees with the required and/or recommended safety equipment and personal protective equipment.
- Having a documented and enforced Workplace Safety Program.
- The Berg Group subcontract agreement must be executed prior to the subcontractor commencing activities at the jobsite.
- Understand cancellation of contract may occur due to compliance and/or conformance violations.

## **Safety Committee**

*(For more information on the Safety Committee see Section-8)*

The Safety Committee is accountable for the following responsibilities:

- Actively participate in coaching fellow employees to positively influence safe behaviors and acceptable practices on The Berg Group jobsites.
- Solicit suggestions and concerns about improving safety-related performance from other employees.
- Motivate and encourage results-oriented actions to improve Workplace Safety Program performance.
- Review accidents and recommend solutions for correcting root cause of incidents.

- Assist in reviewing accident statistics to identify possible trends.
- Evaluate Workplace Safety Program performance and assist in identifying gaps in achieving organizational goals.
- Discuss possible new methods of accident prevention.
- Actively and visibly participate in risk control activities and training.
- Assist in development and revision of The Berg Group policies and procedures to advance the quality and performance of all risk control activities.
- Discuss and review trends in personal protective equipment.
- Identify opportunities to improve safety awareness.
- Discuss and review progress of the Safety Committee.

## **SECTION 4: HAZARD IDENTIFICATION, MEASUREMENT AND RISK CONTROL**

### **Pre-Job Planning**

The Field Coordinators and Foremen shall identify risk affecting operations prior to beginning any work onsite. They are tasked to identify, plan and allocate the required resources for effective risk control throughout the entire duration of the project. The Supervisors and Foremen shall perform the following tasks in the planning stages of the project:

- Design the work to include the specific owner requirements, The Berg Group policies and procedures and federal, state and local regulations governing safety-related performance.
- Identify hazards effecting The Berg Group employees, equipment and materials so as to provide adequate controls such as:
  - a. Fire prevention and firefighting equipment.
  - b. First aid and medical services.
  - c. Ladders.
  - d. Material storage and handling.
  - e. Personal protective equipment.
  - f. Preventative maintenance and equipment support.
  - g. Trenching and shoring.
- Identify hazards effecting members of the public and private property:
  - a. Temporary traffic control requiring signs, barricades, Flaggers or other necessary controls.
  - b. Public pedestrians and children – need for temporary walkways, overhead protection, securing equipment, fencing, etc.

- c. Railroads – notification to railroads of our operations, securing train schedules, flagmen, warning signals and special insurance
  - d. Utilities (underground and overhead) locating and marking, shoring, blocking and special insurance.
- Identify hazards involving licensed vehicle operations:
  - a. Traffic exposure, detours, barricading and load limits.
  - b. State/local regulations.
  - c. License and permit requirements.
  - d. Preventative maintenance.
  - e. Hiring, verifying driver abilities and references.
- Subcontractor risk control:
  - a. Procedures for enforcing subcontractor compliance and conformance.
  - b. Verification of subcontractor compliance with The Berg Group insurance requirements.
- Allocate all required resources to facilitate risk control activities.
- Disseminate relevant information regarding:
  - a. Operations involving hazardous materials and/or conditions
  - b. Emergency action plan and specific evacuation procedures
  - c. The location and availability of the written safety programs
- Ensure training needs are consistent with jobsite-specific hazards.
- Train employees on the Hazard Communication Program by effectively communicating:
  - a. Proper use of chemical labeling
  - b. How to obtain appropriate hazard information by reading labels
  - c. How and where hazardous materials are used and stored onsite
  - d. The physical and health hazards of the hazardous materials
  - e. Methods to observe and detect the presence or release of a hazardous material onsite (e.g. visual appearance, odor, etc.)
  - f. Actions employees can take to protect themselves from exposure to hazardous materials. This includes conformance and compliance to work practices, use of personal protective equipment and emergency action/response procedures
- Emergency procedures are reviewed and current to effectively deal with spills, fire, disposal and medical emergencies.

- Request SDS when ordering chemicals and hazardous materials.

## **Jobsite Inspections and Pre-Task Planning**

Job site inspections are an essential component to achieving organizational goals in occupational safety and health. Routine inspections centered on accountability of The Berg Group policies and procedures are the responsibility of Supervisors, Foremen and the Safety and Training Department. Each inspection is designed to identify specific hazards for effective risk control.

Daily job site inspections focus on proactively identifying substandard practices and conditions that threaten the health and safety of The Berg Group employees, subcontractors and the public. These routine inspections evaluate compliance to regulations and conformance to The Berg Group policies and procedures. Immediate corrective action is taken on any situation identified as substandard.

Pre-task planning is essential for allocating the required resources to facilitate risk control activities. Pre-task planning involves a comprehensive analysis of jobsite conditions and procedures to be performed in order to identify risk to the operation. Once risk is identified, individual solutions are developed to target specific exposure. The goal is to make every reasonable effort to reduce or eliminate risk for the health and safety of all parties involved or third parties affected by The Berg Group operations.

## **Preventative Maintenance Inspections**

Routine maintenance inspections are performed on all of The Berg Group vehicles, equipment and tools. Maintenance inspections are a critical component to the success of the Workplace Safety Program. The Berg Group requires our employees to perform a daily inspection of all equipment prior to beginning operation. These inspections are designed to identify potential hazards effecting the health and safety of employees, subcontractors and the public.

Routine maintenance inspections support The Berg Group commitment to provide proper preventive maintenance on all vehicles, equipment and tools in our inventory. Any substandard conditions found on equipment shall be noted on a Maintenance Repair Order Form and the equipment shall be promptly returned to the maintenance shop for repair.

## **Annual Management System Review**

The Berg Group risk management system is audited annually to determine the effectiveness of current strategies for risk control. The Berg Groups dedication to continuous process improvement involves a systematic review of safety-related incidents to compare actual results to organizational goals. Current policies and procedures are then evaluated to identify opportunities to improve upon current practices. The goal of this audit is to improve operational efficiency by reducing the likelihood of occupational health and safety incidents.

## **SECTION 5: COMMUNICATION**

## **Safety Meetings**

The Berg Group utilizes annual Safety meetings as a tool to support effective communication on issues affecting our operation. The nature of our work creates significant challenges in maintaining close contact with every individual on our jobsites. Safety meetings are designed to create opportunities to share information between management and field operations. The Berg Group values the input, advice and opinion of each employee and encourages an open, two-way dialogue on matters involving occupational safety and health. Our objective is to increase employee involvement and awareness in occupational safety and health while simultaneously nourishing the safety culture.

## **Weekly Tool Box Talks**

Weekly Tool Box Talks are created by the Safety Director to help facilitate weekly safety on the jobsite. These weekly talks focus on topics that directly affect our employees and are used by the jobsite Foremen to communicate pertinent, real-time information to all individuals under his/her supervision. The proceedings of this meeting, along with the names of employees in attendance, shall be recorded on the weekly tool box talk tracking sheet.

The original Tool Box Talk record shall be sent to the Safety Director weekly. All documentation is maintained by the Safety Director to track system performance.

## **Job Site Evaluations**

The Field Coordinators/Safety Director shall perform regular and routine jobsite evaluations to monitor and reinforce acceptable practices/conditions for ensuring compliance to regulations and conformance to The Berg Group standards.

## **OSHA Record Keeping**

The Safety Director shall maintain the OSHA 300 Log in accordance with federal regulations. The completed OSHA 300 Log shall be posted at The Berg Group offices no later than February 1 of the following calendar year and on jobsite trailers where operations have 6 months or greater of estimated duration. On March 1, the form can be taken down and permanently filed.

## **New Employee Orientation and Training**

New employee orientations are fundamental to the success of The Berg Group Workplace Safety Program. Each newly hired employee shall undergo the New Hire Orientation Training prior to being authorized to perform any work or task on The Berg Group jobsites. Upon successful completion of this training, newly hired employees are authorized to begin work at The Berg Group. Supervisory personnel shall advise and coach each new employee to support the policies and procedures included in The Berg Group Workplace Safety Program.

## **SECTION 6: ACCIDENT INVESTIGATION**

### **Purpose**

The Accident Reporting and Investigation Plan outlines The Berg Groups practices for reporting and investigating accidents. This written plan is designed to comply with the reporting requirements of 29 CFR 1904 and all workers compensation laws. Our accident investigation procedures comprehensively examine the incident to determine the root cause leading to a breakdown in the management system. The Berg Groups efforts then focus on developing effective controls to reduce likelihood of similar situations negatively impacting the health and safety of our employees, subcontractors, the public and the environment.

### **Administrative Duties**

The Berg Group shall be responsible for developing and maintaining the written Accident Reporting and Investigation Plan. The Safety Director is solely responsible for all facets of the Accident Reporting and Investigation Plan and has full authority to make any changes necessary to ensure satisfactory results. The Safety Director is the point of contact for all accident investigations. Appropriate training commensurate with the complexity of the plan, is provided by The Berg Group to ensure all employees are competent in administering the Accident Reporting and Investigation Plan.

The Accident Reporting and Investigation Plan is maintained and on file at the following location:

The Berg Group  
118 Peavey Circle  
Chaska, MN 55318

### **Accident, Incident and Injury Reporting Procedures**

The Berg Groups Accident, Incident and Injury (**All**) reporting procedures are as follows:

- All employees are required to report an All to the Forman/Field Coordinator/Safety Director immediately following the event occurring.
- Any employee witnessing an accident on-the-job shall follow emergency response procedures and report the accident to the Safety Director once the situation is under control. Each employee witnessing the accident and/or taking part in the emergency response, shall fill out an Employee Accident Investigation Form.

### **Accident, Incident and Injury Investigation Procedures**

The Executive Management/Safety Director shall be accountable for the following responsibilities in the event of an Accident, Incident or Injury (All):

- Ensure the scene is secure and all employees and the public are removed from the area.
- Collaborate and coordinate with all emergency services involved in the incident response.
- As soon as possible, conduct an accident investigation at the scene of any event with



injury potential or an estimated value of \$5000 or more (as determined by the Safety Director) in order to document all relevant information.

- Interview the employee(s) involved in the situation and any witnesses to determine the sequence of events of leading up to the event and actions taken during and afterward.
- Ensure each individual interviewed has been given the opportunity to review his or her version of the story. Allow each individual ample time to make any necessary corrections in order to describe the events in the clearest possible detail.
- The Safety Director shall:
  - a. Track and report all All's on a weekly basis.
  - b. Identify any trends in occupational safety and health.
  - c. Identify any equipment, materials, or environmental factors involved in All's to determine risk control strategies for prevention.
  - d. Reduce likelihood of future occupational safety and health incidents through effective All information management.
- Subsequent investigations to focus on developing a sequence of events leading up to the accident to determine the root cause of the breakdown in the management system
- Perform a root cause analysis on each All in order to develop controls to reduce likelihood of similar events that impact the safety and health of The Berg Group employees, subcontractors, the public and the environment.

Field Coordinators/Formen shall be accountable for the following responsibilities in the event of an Accident, Incident or Injury (All):

- Ensure any employee designated by the Executive Management/Safety Director to be alcohol and/or drug tested for a qualifying event is transported to the pre-determined clinic in a reasonable amount of time.
- Ensure any employee designated by the Executive Management/Safety Director to be assessed for reasonable suspicion of alcohol or drug impairment is assessed by an RSA trained supervisor, and documentation of the assessment results are sent to the Safety Director.

Foremen and Field coordinators shall be accountable for the following responsibilities in the event of an Accident, Incident or Injury (All) on their job site:

- Immediately after an occurrence, contact the Safety Director to report the event.
- As soon as possible, conduct an accident investigation at the scene of any event that has no injury potential and value of less than \$5000 (as determined by the Safety Director) in order to document all relevant information.

All Employees shall be accountable for the following responsibilities in the event of an Accident, Incident or Injury (All) that they are directly involved in:

- Immediately after an occurrence, contact the Foremen, Field Coordinator and Safety Director to report the event and provide details in order to document all relevant information.

## **Injury, Illness, and Medical Issues**

The Berg Group shall adhere to the following procedures when addressing issues of employee injury, illness or related medical issues:

- If a workplace accident results in an injury or illness requiring hospitalization of three or more employees or a fatality of one or more employee, the Safety Director reports the incident within eight hours by phone or in person to the nearest OSHA office
- If an injured person is taken to a doctor for a medical evaluation, the Safety Director shall attach the doctor's statement to the Accident Report Form.
- If the injury or illness is "recordable" according to OSHA regulation, 29 CFR 1904, then the Safety Coordinator enters each recordable injury or illness on OSHA Form 300, OSHA Form 301A, and a separate, confidential list of privacy-concern cases. All procedures shall be performed within seven calendar days of receiving information classifying the employee's injury as being a "recordable" injury or illness.
- Employees with workplace injuries resulting in time off work shall be enrolled in The Berg Group Return-to-Work Program to facilitate their full recovery and resumption of original duties.
- Weekly compensation for workplace injuries or illnesses requiring time off work, as indicated by law, applies after the third day of wage loss - Sundays are not included in the three-day waiting period, unless the associate ordinarily works on Sunday.
- If the disability continues for more than seven calendar days, workers compensation goes back to day one.

## **Recordkeeping**

The Safety Director shall be responsible for maintaining the following records and documentation:

- OSHA 300 Form – Log of Work-Related Injuries and Illnesses. Starting January 1, 2002, injuries and illnesses at the company are recorded on this form within seven calendar days of receiving information of a "recordable" injury or illness occurring.
- OSHA 300-A Form – Summary of Work-Related Injuries and Illnesses. This form is completed by the end of the year, posted no later than February 1 of the year following the year covered by the form and kept posted in place until April 30.

## **Annual Summary Posting**

The Safety Director is accountable for the following procedures at the end of each calendar year:

- Review the OSHA 300 Form(s) to verify entries are complete and accurate.
- Correct any deficiencies identified in the reporting system.
- Create OSHA 300-A, an annual summary of injuries and illnesses recorded on the OSHA 300 Form.
- Safety Director certifies the annual summary is complete and accurate.
- Post OSHA 300-A as required by law. This form is posted in conspicuous locations from February 1 through April 30 of the following year where employee notices are customarily displayed.

## **Employee Training and Involvement**

The Berg Group provides our employees with knowledge and skills training to assist in developing proficiency in their daily tasks. Effectively training our employees is an essential component to ensure satisfactory results in the event of an accident investigation. The Berg Group goal of training accident investigation procedures is to guide employee actions and behaviors for gathering valid and relevant information. The following information is thoroughly explained to employees at the time of initial hire, during weekly safety meetings and annual training:

- The Berg Group policies on Accident Reporting and Investigation Plans
- The Berg Group procedures to report injuries and illnesses
- How employees may be affected by accident investigations

Employees and their representatives will be provided limited access to our injury and illness records upon request. All employees and former employees shall be provided relevant copies of OSHA Forms by the next business after submitting a request with The Berg Group Safety Department. Authorized employee representatives shall receive the requested copies within seven calendar days and all sections of the OSHA Forms shall be removed except the items in sections 10-18. All initial copies are provided to requestors free of charge and additional copies shall be made available for a reasonable charge.

The Berg Group does not discriminate against employees for:

- Reporting a work-related fatality, injury, or illness
- Filing a safety and health complaint
- Asking for access to occupational injury and illness records
- Exercising any rights mandated by the Occupational Safety and Health Act.

## **Program Evaluation**

The Accident Reporting and Investigation Plan is evaluated on an annual basis and updated as needed by the Safety and Training Department. The goal of the evaluation is to determine the effectiveness of current policies and procedures in accident reporting and investigation. Any identified deficiencies or substandard practices shall be immediately addressed to secure the integrity of The Berg Group Accident Reporting and Investigation Plan.

## **SECTION 7: ENFORCEMENT OF SAFETY AND HEALTH PROGRAMS**

### **Enforcement Procedures**

All Berg Group employees shall be held accountable for violating company policy. The Berg Group provides the required resources to facilitate risk control activities for the health and safety of each employee. The Berg Group creates policies and procedures governing occupational safety and health to ensure standards of acceptable work practices and jobsite conditions are effective at controlling risk and reducing likelihood of injuring our employees or the public. Violations of The Berg Group policies and procedures are considered unsatisfactory job performance worthy of disciplinary action. Any employee violating policies and procedures outlined in The Berg Group Policy and Procedures Manual or Safety Manual as provided in the labor agreement, may be subject to disciplinary action including and up to termination. The Berg Group reserves the right to bypass protocol based on the severity of the event to determine the appropriate disciplinary measures.

In any given case, the Berg Group reserves the right to take whatever disciplinary action it deems appropriate, including termination of employment without warning. Disciplinary action up to and including termination without warning may be applied when an employee is willfully negligent in their actions, creates financial loss for The Berg Group, endangers human life, unable to satisfactorily perform her/his assigned duties, refuses to comply/conform to established policies, destroys company or private property.

## **SECTION 8: SAFETY COMMITTEES**

The Safety Committee is comprised of management and field personnel. Committee members meet monthly. All items discussed in the meetings are documented and subsequently communicated to all supervisory personnel to be corresponded to each employee. Area Managers/Foreman is responsible for reviewing Safety Meeting information in conjunction with the weekly Lessons Learned.

### **Mission**

- To create and sustain a safe and healthful working environment.
- To act as representatives of all The Berg Group employees.
- To aid and advise employees on matters of occupational safety and health effecting The Berg Group operations.

### **Goals**

- To increase awareness of risk effecting The Berg Group operations.
- To reduce the frequency and severity of risk.
- To educate employees on acceptable standards of work practices and jobsite conditions.
- To nourish the organizational culture.

## **Responsibilities**

- Influence acceptable practices and conditions on their jobsite or work environment.
- Solicit fellow workers' suggestions and concerns on issues involving occupational safety and health.
- Review accident data and assist in making recommendations for new control measures.
- Review accident statistics to identify possible trends.
- Evaluate program performance.
- Discuss possible new methods of accident prevention.
- Actively participate occupational safety and health training.
- Assist in the development and revision of The Berg Group policies and procedures.
- Discuss and review trends in personal protective equipment.
- Develop incentives to improve safety awareness.
- Discuss and review progress of the Safety Committee to coworkers.