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Section I
Purpose
Of The Plan

Policy

This policy will apply to all levels of management and all employees of Hilscher-Clarke, at all of its work site locations and permanent facilities.

Effective accident and incident prevention includes eliminating or controlling hazards through the establishment and enforcement of safety policies and procedures. We can control conditions and behavior which may lead to a hazardous situation.

To be effective, safety policies and procedures must be practical, reasonable, up-to-date and obeyed by all levels of personnel within the Hilscher-Clarke Electric Co.

Employees (of all levels) must review and understand the rules and the importance of following them.

When management feels the employee is deliberately disobeying the rules and where he/she continues through unsafe actions to endanger his/her own life and the lives of others, prompt and firm action will be justified.

The Safety Manager and all Supervisory Personnel will be trained and held responsible for ensuring that the employees follow the safety policies, procedures and plans put forth by Hilscher-Clarke.

The Safety Manager and Supervisors will be held accountable for ensuring that employees use safe work practices and receive the required training, as outlined in Hilscher-Clarke's safety policies and procedures, to protect their safety and health. The Safety Manager and Supervisors whose construction sites and employees are found to be in violation of Hilscher-Clarke's safety policies and procedures will be subject to Hilscher-Clarke's "Policy of Discipline for Safety Violations" as outlined in this plan.

The President, Safety Manager, and Supervisors also have a general responsibility for ensuring the overall safety of Hilscher-Clarke's equipment and facilities.

Developing and maintaining a safety culture requires ongoing supervision and employee involvement in safety. The President, Safety Manager, and Supervisors must continue to make safety number one by promoting programs that are effective in identifying and reducing hazards at the work site, training our employees and sub-contractors to work safely, and by making safety the primary consideration in all operations. Everyone, at Hilscher-Clarke, who is in a position to supervise the work of others is responsible and will be held accountable for the safety of Hilscher-Clarke's employees.

Individual employees shall be expected to perform their duties in a safe and responsible manner. Violations of safety policies and procedures will not be overlooked until an accident or incident occurs. The Hilscher-Clarke Electric Co.'s employees will be corrected for every infraction of a safety policy or procedure or unsafe behavior as soon as it is observed. Progressive disciplinary actions for these infractions can be found on page 9 of this policy.

Hilscher-Clarke believes that it is far better to use extreme measures than to allow accidents to happen due to laxness in the enforcement of its safety policies and procedures.

Section II
General Program
Management

Program Administration

Because Hilscher-Clarke Electric Co. believes that:

- 1. All accidents and injuries can be prevented.*
- 2. Management and Supervisory Personnel are responsible, and will be held accountable, for preventing injuries and occupational illnesses.*
- 3. Occupational Safety and Health is part of every employee's total job performance.*
- 4. Working safely is a condition of employment.*
- 5. Most workplace hazards can be safeguarded.*
- 6. Training employees to work safely is essential and is the responsibility of management/supervision.*

Because of these beliefs, Hilscher-Clarke has established and set forth the following duties and responsibilities, for each level of employment within Hilscher-Clarke.

Hilscher-Clarke Personnel (no matter what level of management or employment) are expected to adhere (at a minimum) to the following guidelines, with violators being held subject to the company's "Disciplinary Policy" as set forth in this plan.

□ **The President**

1. Provides all levels of management with the services and technical advice needed for proper administration of Hilscher-Clarke's Safety and Health Policies and Programs.
2. Assists Safety Managers and Supervisors in the health and safety training of Hilscher-Clarke's employees.
3. Conducts inspections to identify unhealthy or unsafe conditions or work practices. Prepares written reports of inspections.
4. Recommends programs and activities that will develop and maintain incentives for and motivation of employees in health and safety.
5. Recommends and administers disciplinary action (as outlined in this plan) for repeat violators of health and safety rules as outlined in Hilscher-Clarke's individual safety policies and procedures.
6. Maintains required OSHA postings, emergency telephone numbers, posting requirements outlined in individual safety plans, and any other notices required by applicable State and Local Government agencies at each assigned construction site. Ensures this information is posted in places where employees can see them on each job and also in compliance with any requirements set forth in Hilscher-Clarke's individual Safety Policies and Procedures.
7. Orally report accidents and/or illnesses that result in an occupational fatality or three or more hospitalized workers by telephone or in person to the Area Office of the Occupational Safety and Health Administration (OSHA), U.S. Department of Labor, that is nearest to the site of the incident, or by using the OSHA toll-free central telephone number. This report is to be made within 8 hours of the occurrence.
8. Requires all subcontractors and subcontractor personnel working on a Hilscher-Clarke site to comply with Hilscher-Clarke's individual safety policies and procedures.
9. The President may delegate the responsibility of various aspects of the Disciplinary Program to a Qualified Organization. However, the President's ultimate responsibility for his/her aspects of the program cannot be delegated.

Program Administration (cont.)

□ Safety Manager

1. Familiarize him/her-self with health and safety regulations related to his/her area of responsibility.
2. Develops programs and technical guidance to identify and remove physical, chemical, and biological hazards from facilities, operations, and sites.
3. Directs, implements, and coordinates health and safety program elements and activities within area of responsibility.
4. Requires all employees to be trained to properly use, approved individual personal protective equipment and safety devices, as outlined in Hilscher-Clarke's individual safety policies and procedures.
5. Develops and maintains accident and incident investigation and reporting procedures and systems. Investigates serious or reportable accidents and takes action to eliminate accident causes. Reportable incidents will consist of fatalities, lost workday cases, and without lost workdays requiring medical treatment.
6. Reviews all accidents/incidents with Supervisors and workers involved. Ensures accident reports and Workers' Compensation forms are completed and submitted as appropriate. Insures that corrective action is taken immediately to eliminate the cause of the accident/near miss.
7. Ensures that approved safety equipment is available, maintained, used and stored correctly.
8. Ensures that all persons within area of responsibility receive job safety and health training as required.
9. Conducts (monthly/quarterly) health and safety inspections of work sites. Directs correction of unsafe conditions.
10. Conducts (weekly/monthly) safety briefings with all Supervisors and/or workers.
11. Ensures that Supervisors are aware of and comply with requirements of Hilscher-Clarke's individual safety policies and procedures.
12. Recommends and administers disciplinary action (as outlined in this plan) for repeat violators of health and safety rules as outlined in Hilscher-Clarke's individual safety policies and procedures.
13. Maintains copies of applicable programs and Hilscher-Clarke's safety forms in the work area, in accordance with Hilscher-Clarke's individual safety policies and procedures (i.e., MSDS sheets, safety training logs/sheets, OSHA 300 Injury Log if the work area is not located near/with the central office.
14. With the approval of the President, the Safety Manager may delegate the responsibility of various aspects of the Disciplinary Program to a Qualified Organization (as approved by the President and/or President). However, the Safety Manager's ultimate responsibility for his/her aspects of the program cannot be delegated.

□ Supervisory Personnel

1. Is familiar with, explains, and enforces health and safety regulations that apply to company operations within his/her area of responsibility.
2. Ensure that approved safety devices and approved personal protective equipment (PPE) is being used and properly cleaned, inspected and stored by persons under his/her supervision.
3. Instructs and trains all persons within area of responsibility, in Hilscher-Clarke's individual safety policies and procedures requirements.
4. Conducts frequent and regular safety and health inspections of his/her work area(s) and ensures that no unsafe condition(s) exist in area of responsibility.

Program Administration (cont.)

□ **Supervisory Personnel (cont.)**

5. Recommends and administers disciplinary action (as outlined in this plan) for repeat violators of health and safety rules as outlined in Hilscher-Clarke's individual safety policies and procedures.
6. Conducts weekly (or more often if needed) safety briefings with all workers under his/her supervision.
7. Ensures that injuries and illnesses are treated promptly and reported properly.
8. Acts on reports of hazards or hazardous conditions reported to them by all individuals.
9. With the approval of the Safety Manager, the Supervisor may delegate the responsibility of various aspects of the Disciplinary Program to a Qualified Organization (as approved by the Safety Manager). However, the Supervisor's ultimate responsibility for his/her aspects of the program cannot be delegated.

□ **All Employees**

1. Be familiar with and comply with Hilscher-Clarke's individual safety policies and procedures.
2. Properly use, inspect and store the required approved safety devices, and personal protection equipment (PPE), as outlined in Hilscher-Clarke's individual safety policies and procedures.
3. Notify Supervisor immediately of unsafe conditions/acts, accidents, injuries, or illnesses.

□ **Human Resources**

1. Maintains all records and reports of accidents that have taken place during company operations. These forms and reports may include the OSHA Form 300 Injury/Illness Log, the OSHA Form 301 Supplementary Record of Occupational Injury and Illness (or an acceptable substitute). Workers' Compensation First Report of Injury Form.
2. Processes all paperwork associated with:
 - Accidents and/or illnesses;
 - On-site Inspections and In-house Audits;
 - Disciplinary Actions (a copy to be kept in the employee's permanent employment record);
3. Maintains all medical records, evaluations and exposure monitoring records for a period of 30 years.
4. Maintains all training records for a minimum of three (3) years.

Section III
Disciplinary
Program

1.0 Policy of Discipline For Safety Violations

- 1.1** Hilscher-Clarke recognizes that it is essential to provide positive, affirmative action when employees fail to practice, and comply with, the safety policies of this company. Therefore, after employees have been provided with documented safety training, it shall be the responsibility of the employee to practice these safety standards and practices. Employees, who fail to do so, endanger not only themselves, but also fellow employees. The company has adopted a zero tolerance policy towards unsafe behavior.
- 1.2** In order to protect all company employees from the employees who fail to maintain consistent safe work habits, all employees (regardless of level of management) shall be subject to the following disciplinary schedule without prejudice or discrimination.

First Violation	➤ Verbal warning documented in personnel file.
Second Violation	➤ Written warning with copy to union representative (if applicable).
Third Violation	➤ Three (3) day Suspension
Fourth Violation	➤ Employment terminated with notification in writing to union representative (if applicable).

- 1.3** Every step of the disciplinary procedure will be fully documented with a copy placed in the job site file plus a copy sent to Human Resources. The President, Safety Manager, Human Resources, or any Hilscher-Clarke official may issue reprimands for safety violations. ***NO ONE*** will be exempt from being issued a safety reprimand.
- 1.4** All offenses will be recorded and filed in the employee's personnel file. Each violation will be kept on disciplinary record for a period of one-year following the infraction.
- 1.5** Each phase of discipline shall also entail safety counseling from a designated company representative.
- 1.6** Hilscher-Clarke reserves the right to terminate immediately, and without any prior warning, any employee it determines has acted in an unsafe manner and/or refuses to obey safety policies and procedures as outlined in Hilscher-Clarke's individual safety policies and procedures.
- 1.7** The following may be grounds for immediate and unconditional dismissal:
- Failure to report all incidents (accidents, injuries, and near misses) immediately.
 - Possession or use of illicit drugs or alcohol.
 - Possession of firearms or explosives.
 - Malicious destruction of Hilscher-Clarke property.
 - Fighting or horseplay.
 - Falsification of Hilscher-Clarke safety documents.

Appendix

Employee Disciplinary Report

Employee Name: _____ Employee Number: _____

Work Site (i.e., location, project no., description, etc.): _____

Date of Incident: _____ Time (if applicable): _____ Work Shift (if applicable) _____

Nature of Incident:		
Immediate Supervisor's Remarks:		
Name of Immediate Supv.:	Signature of Immediate Supv:	Date:
Employee's Remarks:		
Employee's Signature:		Date:

Do Not Write Below This Line (For Office Use Only)

The above offense(s) have been noted and are made a part of the employee's personnel file as of the date listed below.

Offense Number (circle applicable number): 1 2 3 4 5 Other (explain) _____

Human Resources Remarks:		
Name of H.R. Rep.:	Signature of H.R. Rep.:	Date:

Copy sent to Employee on _____ by _____ via _____

Return this form to Human Resources immediately upon completion.