

# Health and Safety Program

## Purpose

The purpose of the Health and Safety Program, also known as the MN AWAIR Program, Accident Prevention Plan, or Injury & Illness Prevention Program (I2P2), is to outline Element's initiatives to maintain a safe working environment for all employees, prevent incidents and accidents, and to instill safety ownership in all employees.

Element strives to maintain continuous improvement in our safety practices, provide employees with comprehensive training, and maintain consistent and effective communication regarding all applicable areas of safety and compliance. To aid in these initiatives, Element Management is committed to providing leadership and necessary resources to maintain a safe workplace.

This Health and Safety Program is written following Minnesota Statute S.182.653 Subd.8 (MN AWAIR), Washington WAC 296-800-140, Various clauses of the Occupational Health and Safety Act (OHSA) of Ontario, Canada, and other US federal, US state, and Canadian provincial requirements.

## Scope

This policy applies to employees in the United States and Canada, as well as to contingent workers on assignment at Element and working in an Element office.

This Health and Safety Program will include:

- Safety Goals & Objectives.
- Defined Roles and Responsibilities.
- Employee Involvement.
- Hazard Identification and Assessment.
- Hazard Prevention and Control Systems.
- Education and Training.

## Management Commitment

We believe in the importance of each employee and give top priority to maintaining a safe working environment for our employees. Management is committed to providing leadership and the necessary resources to maintain a safe workplace.

We have established and implemented a Health & Safety Program, which integrates safety and health measures into each job task so that safety, health, and job performance become synonymous. The installation of a formal safety program is the beginning of an

ongoing and evolving set of safety-oriented procedures, systems, equipment, philosophies, and enforcements that combine to develop a productive safety attitude and reduced-loss environment. A reduced-loss environment will be accomplished through the cooperative efforts of managers, supervisors, and employees who will seek to obtain the lowest possible industrial accident rates.

Some of the tools used to reduce work hazards include:

- Management Leadership
- Employee Participation
- Hazard Identification and Assessment
- Hazard Prevention and Control Systems
- Education and Training
- Program Evaluation and Improvement

By accepting mutual responsibility to operate safely, management, supervisors, and employees will all contribute to the well-being of personnel, and subsequently, the company. 2 We strive to maintain a great safety record.

Our goal is to continue improving on that record while addressing associated areas of safety and compliance.

**Laura Dottori-Attanasio**

**Chief Executive Officer**

## **Safety and Health Goals**

As part of the Health & Safety Program, Element has established specific goals to assist in driving the Health & Safety Program forward and ensure continuous improvement. Each stated goal also has a specific objective designed to assist in meeting goals. Together, the process of establishing goals/objects serves as a tool for promoting a safe and healthy working environment.

Element Safety Goals and Objectives	
Goal	Objective
Ergonomic Desk Assessment Process	Streamline the Ergonomic Desk Assessment Process for all locations.
	Educate employees and emphasize the availability of customized ergonomic assessments.
	Continue automatic request/notification of Ergonomic Desk Assessments for all new employees.
Employee Involvement and Engagement in Safety Programs.	Empower personnel to immediately address employee and facility safety concerns, coordinating as needed with US Compliance representatives.
	Implement a facility Self-Inspection system
	Correct and close all identified safety issues in a reasonable time frame.
	Encourage the use of the Safety and Near Miss reporting process.

## Responsibilities

Management, supervisors, and employees are responsible for maintaining a safe and healthy work environment. Although roles in an effective Safety and Health Program may differ slightly, the scope and results are the same: Improve overall safety awareness and minimize the occurrence of accidents.

### Management Responsibilities

Commitment to safety starts with management. This commitment is demonstrated through the written safety and health policy statement. The Health and Safety Program will include documentation of procedures for establishing, measuring, and maintaining a management presence in safety and health to continue strengthening the overall effectiveness of the program.

Management will provide a framework to allow supervisors and employees to develop the skills and tools necessary to address both preventative and reactive safety and health concerns.

Management commitment will be measured through observation of each facility and its employees and by examining:

- Workers' Compensation Costs.
- Additional Injury Metrics.
- An Annual Review and Goals Update of the Health and Safety Program.
- The Joint Health and Safety Committee Meetings
  - o o OSHA 20224 update allows virtual attendance

Management will oversee events, train employees in accident reduction, and utilize our professional safety and health advisors, US Compliance.

### **Supervisor Responsibilities**

Supervisors must be committed to health and safety every day and must be able to effectively communicate and enforce all safety and health policies and procedures. The responsibility of leadership also involves being able to:

- Support the safety and health process with a positive attitude.
- Encourage and demand that all employees take part in the facility safety program (Training, committees, inspections, observations, etc.).
- Provide safe materials, equipment, and/or tools.
- Take a personal role in safety training.
- Conduct occasional safety inspections and implement corrective action.
- Be involved in safety meetings.
- Stress the importance of safety through action and words.
- Take disciplinary action as required and when needed.

### **Employee Responsibilities**

All employees must uphold the following standards:

1. Observe all company safety and health rules and apply the principles of incident prevention in your day-to-day activities.
2. Be aware of the goals of the Health & Safety Program and how they are being implemented.
3. Always walk on company premises (no running) and do not take any unauthorized shortcuts.
4. Never report to work under the influence of alcoholic beverages or drugs. Employees shall not consume, purchase, or possess drugs/alcohol while on the company premises.
5. In case of sickness or injury, no matter how slight, report at once to your supervisor for first aid. Do not attempt to treat injuries on your own.
6. Bring unsafe conditions to the attention of your supervisor immediately.

7. If a colleague is doing something that may injure themselves or others, tell them about it. They may not be aware they are doing it and you could save them and/or others from injury.
8. Keep your work area and the floor around you clean and dry.
9. Never tamper with electrical circuits or switches. Only qualified electricians may perform electrical work.
10. Use only approved extension cords. If frayed electrical wires exist, do not try to repair them unless it is your job, or you have been trained to do so. Call facilities or maintenance for repairs.
11. Keep electrical cords away from sinks, out of doorways and hallways, and any other place people could trip.
12. Smoking will be permitted outside designated areas only.
13. Know who is on the facility Emergency Response Team (ERT).
14. Notify your supervisor in the event of an injury, illness, or emergency.
15. Keep fire exits, hallways, and exit signs clear and unobstructed always.
16. Learn the location and proper use of firefighting equipment, safety exits, and evacuation procedures in your department.
17. Actively support and participate in the company's efforts to provide a workplace free of accidents and injuries.

## Hazard Prevention and Control

A core element of the effectiveness of the safety program is the proactive effort put toward the elimination of accidents and incidents. The goal is to anticipate what could happen and install controls or procedures to prevent them from occurring. Examples of activities completed to prevent incidents and accidents may include:

**Employee Communication** – Important safety-related issues will be communicated to employees through a centralized reporting system. This system/area will be maintained with current event information and other key safety activities that are taking place at the facility.

**The policy of Reporting Safety Concerns or Hazards** – Employees are the “eyes and ears” of our safety program. Any suggestions brought to our attention or any safety reporting forms that are filed are evaluated as soon as possible and acted upon.

**Near Miss Evaluation** – The Heinrich Accident Causation pyramid recognizes that for every recordable accident, many more near-miss events occurred leading up to the accident. Reviewing all near misses is a key part of our preventative approach to incidents and illnesses.

**Non-Routine Task Evaluation** – See the Hazard Communication program for an overview of this policy.

**Preventative Maintenance** – Facility Departments have established a hierarchy of activities that are completed on facility equipment to keep the equipment running properly and safely. The activities are conducted proactively even if no problems are recognized on the machines.

**Emergency Planning** – “The failure to plan is a sure plan to fail.” Another key element to a successful safety program is ensuring that employees know how to react in the event of an emergency. Each Element facility maintains an up-to-date Emergency Response Plan as well as an active Emergency Response Team (ERT) with responsibilities established on how to handle incipient stage emergencies.

## Worksite Analysis

To effectively protect employees from workplace hazards, there are mechanisms in place to identify hazards or areas of concern within each facility. The following are several ways facilities are analyzed, and hazards are identified:

- Self-Inspections of the facility.
- 3rd Party site safety inspections (US Compliance).
- Ergonomic screenings.
- Review of employee suggestions and safety reporting forms.
- Periodic review of written safety policies

Once hazards are identified, there must be a process to evaluate the findings to better understand the root causes and options for improving the level of safety. Simple actions will be completed as soon as feasible through the affected supervisors and/or employees.

- Complex actions will be routed through the management team to ensure alignment on the corrective action.
- Corrective action tracking and effectiveness must be established and monitored.
- The action items will be managed through completion and until the effectiveness of the solution can be verified.

## Safety and Health Inspection Process

To prevent injuries and illnesses, Management, Supervisors, and Employees need to be alert to the physical surroundings of their work areas. Unsafe conditions or inappropriate/unsafe work methods could develop at any time, so it is important to monitor and evaluate the workplace on a routine basis. Health and Safety prevention activities need to be reinforced systematically to minimize physical hazards within the

workplace. Element believes that one of the best ways to identify and eliminate these hazards is through a plan of self-inspection. Self-inspection guidelines are as follows:

- The Facility Management Team will ensure that the entire facility is evaluated periodically.
- Additional focus may be given to certain areas or departments; however, all areas will be captured for inspection at least periodically.
- An inspection checklist will be utilized to assist with the inspection process.
- Accident reports and any employee safety suggestions will also be used to assist with the self-inspection process. Findings of the self-inspection will be reviewed, evaluated, and acted upon immediately if possible.
  - o Unresolved problems or issues resulting from this process will be forwarded to management to assist with their resolution.
  - o All items will be tracked as to how they were resolved or brought to completion.
  - o All items will be managed on a Safety Action Item List (SAIL) or similar tracking method.
  - o Follow-up self-inspections will be utilized to verify that corrective actions taken remain in use and are effective at controlling the hazards and protecting the employees.

## Accident Investigation and Reporting

All accidents at Element, no matter how minor, shall be reported immediately to the Supervisor, Human Resources, or other designed Site Management personnel for investigation and evaluation.

- Every accident includes a sequence of contributing causes, it may be possible to avoid a repeat performance of the first event by recognizing and eliminating these causes.
- The removal of a single cause may prevent a recurrence.
- After the evaluation, the supervisor and site management must determine the possible consequences that could take place if the situation is not corrected.
- The supervisor and/or site management must take appropriate action to remedy the cause(s) based upon those findings (i.e., investigate, report, correct, etc.).

## Minor Injury or Illness

After completing necessary emergency actions following an accident, an investigation of the accident will be conducted by the immediate supervisor in conjunction with any witnesses to determine the possible causes. The findings of the investigation are to be documented on a First Report of Incident Form (see Appendix).

Distribute the accident investigation report to the following individuals:

- Human Resources

### **Major Injury or Illness**

After emergency actions following the accident are underway, a detailed investigation must be conducted. Follow instructions in the Minor Injury or Illness section above and notify the facility's top management official, human resources, and the employee's supervisor immediately. The investigation will be conducted under the direction of the top management official.

### **United States:**

In the event of a severe injury, the nearest office of the Occupational Safety and Health Administration (OSHA) must be contacted within the following timeframes:

- Fatality: Within 8 hours of learning of the occurrence
- Admittance to a Hospital, Amputation, or Loss of an Eye: Within 24 hours of learning of the occurrence

Federal OSHA: (800) 321-6742

Illinois OSHA: (800) 782-7860

Maryland OSHA: (888) 257-6674

Minnesota OSHA: (651) 284-5050

Notify MN OSHA Monday-Friday, 8 am to 4:30 pm.

Notify Federal OSHA outside of business hours or on weekends.

New York: Call Federal OSHA

Pennsylvania: Call Federal OSHA

Texas OSHA: (800) 321-6742

Washington OSHA: (800) 423-7233

Washington OSHA has an 8-hour reporting requirement for Fatalities and Hospital Admittance, and a 24-hour reporting requirement for non-hospitalized amputation or loss of eye.

The initial call shall be made by Human Resources in coordination with the location's management team. The following information will need to be relayed:

- Company name
- Location of the incident
- Time of the incident
- Type of reportable event (i.e., fatality, in-patient hospitalization, amputation, or loss of an eye)



- Number of employees who suffered the event
- Names of the employees who suffered the event
- Contact person's name and phone number
- Description of the incident Immediate corrective actions or actions taken to isolate the issue

Any equipment involved in a fatal accident is not to be moved until a representative of the Department of Labor and Industries investigates the accident and authorizes the removal of the equipment. However, if it is necessary to move the equipment to prevent further accidents or to remove the victim, the equipment may be moved as required.

## Ontario

Notify the Ministry of Labour, Training and Skills Development if someone is critically injured or killed (employee or not) and if there is a reasonable connection between the hazard that led to the critical injury or death and the workers' health and safety. Critical injuries include Fatality, loss of consciousness, substantial loss of blood, fracture, amputation, burns of a major portion of the body, loss of sight in an eye.

Do all the following:

1. Call the Ministry of Labour, Training and Skills Development: (877) 202-0008.
2. Call or tell the joint health committee or health and safety representative and the union (if there is one) about the incident.
3. Notify the Ministry of Labour, Training and Skills Development, in writing, within 48 hours of the incident, making sure to:
  - a. Address the notice to "Attention: Director."
  - b. Mail or fax it to the Regional Office closest to the workplace where the incident occurred:

Central Region: West

1290 Central Parkway West, 4th Floor

Mississauga, ON L5C 4R3

(800) 268-2966

Fax: (905) 615-8853

## Policy on Reporting Hazards or Near Misses

The Policy on Reporting Hazards or Near Misses provides the procedure and tools necessary to ensure hazards can be effectively reported by employees and resolved to ensure the hazards do not result in injury to facility employees, contractors, or visitors.

All employees should always stay alert and keep safety in mind. A key component to staying alert is recognizing any unsafe conditions, unsafe acts, or other safety issues that may develop in the facility. Anyone who suspects that a hazard exists or observes any unsafe work practices should report it to their supervisor or site management.

Employees may follow the following steps to file a formal concern:

- All concerns that could lead to imminent danger should be reported immediately to your supervisor or manager.
- For other concerns obtain a copy of the “Safety Reporting or Near Miss Form” (see Appendix).
  - o Document (describe) the unsafe condition, unsafe act, or safety observation. The form can also be used to document positive safety observations in the facility.
  - o Include thoughts or ideas on how the safety condition could be improved.
  - o List your name on the form if you would like to be notified directly as to the status of the safety issue. The identifying employee may choose to be anonymous on the form, although they will not be notified of the progress of the identified item.
  - o Give the completed form to your supervisor.

Completed forms will be evaluated upon collection by site management. Urgent concerns will be handled immediately, and larger or more complex issues will be brought to the necessary site management personnel for discussion. Once the safety issue is resolved, or as it progresses, site management will keep the identifying employee notified of the status of the action taken to eliminate the condition or concern.

Employees are encouraged to report all safety observations and near-miss incidents with no fear of disciplinary action. The disciplinary process will not be implemented for observations or near-miss incidents if those involved proactively report, take an active part in helping understand what happened, and aid in resolving any corrective actions to prevent a recurrence.

## Safety & Health Orientation

Safety orientation will begin on the first day of employment for all new employees, re-hires, part-time employees, and those transferred from another department. Employees will receive specific training via Element’s online training platform regarding hazards associated with their duties and the company's policies and rules.

The orientation will include:

- A tour of the facilities to acquaint the employee with the entire operation by the immediate supervisor, if applicable.
- Information on how the employee's job is important to the finished product or service.
- Employee safety responsibilities.

- Communication, responsibility, and reporting of hazards, potential hazards, safety concerns, and near misses.
- Accident investigation and reporting.
- General safety training requirements and process

Human Resources (HR) and/or the immediate supervisor of the employee will thoroughly instruct the individual on the job safety and health requirements. A Safety Orientation Checklist (see Appendix) may be utilized to document and conduct the safety orientation effectively.

## On-The-Job Training

Ongoing safety and health education programs will be provided for all employees to increase awareness of accident-causing factors and methods for preventing injury and illness. Safety and health education programs also promote team spirit and the acceptance of safety and health rules by presenting accident prevention as a positive, desirable, and integral part of every activity within the company. Element will provide training to achieve these initiatives and to familiarize each person with safety and health requirements.

### General Training for All Employees

- Health and Safety Program components
- Hazard Communication (Right-to-Know) Training: Information on physical and chemical hazards, Safety Data Sheets (SDSs), labeling processes, etc. (US Only)
- Workplace Hazardous Materials Information System (WHMIS) (Canada Only)
- Emergency Preparedness, Prevention, and Response Training: Instruction on how to respond to incipient stage emergencies. Topics covered include Fire Evacuation, Fire Extinguisher Use, and Other Facility-Specific Emergency Protocols such as Severe Weather, Earthquake, Etc.
- Bloodborne Pathogens Awareness: Instruction on remaining clear of all potentially infectious materials. The facility's Emergency Response Team is trained to respond to these incidents.
- Ergonomics Training: Instruction on the Element Desk Worker Ergonomics Evaluation Process and information on the use and care of the back and how to prevent back injuries (i.e. how to lift) as it relates to the work they are performing.

### Emergency Response Team (ERT)

- Training Emergency Response Team Protocols and Procedures
- Bloodborne Pathogens Training: Instruction on the proper procedures to follow in any incident involving blood or any other infectious material.

### Facilities, Maintenance, or Other Training

Additional job-specific training may be provided on a case-by-case basis to train a limited number of employees on specific safety procedures. Contact Human Resources if additional training is needed. “Authorized Level” training may include topics such as Lockout Tagout, Confined Space Entry, Personal Fall Protection, Forklift Operator Training, Hot Work Safety, and Hoist Inspection.

## **Safety and Health Disciplinary System**

Element reserves the right to enforce the following steps regarding disciplinary action for safety and health violations. Serious issues may warrant more severe action. Copies of all warnings and reports should go to the employee and be retained in the employee's personnel file.

### Four-Step System

First Violation:	Verbal warning
Second Violation:	Written warning
Third Violation:	Written warning; one-day suspension without pay
Fourth Violation:	Written warning; one-week suspension; and/or termination if warranted

## **Program Evaluation & Improvement**

Element will conduct an annual review of the Health & Safety Program to determine if it has been implemented as designed and is making progress toward achieving its goals. The program will be modified to correct deficiencies, as necessary. All involved parties of Element shall continuously look to identify new ways to improve the program.

## **Administration**

Original Policy Date: November 2020

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## **Appendix**

- Facility Self-Inspection Form
- Safety Observation or Near Miss Report Form
- Safety Orientation Checklist