

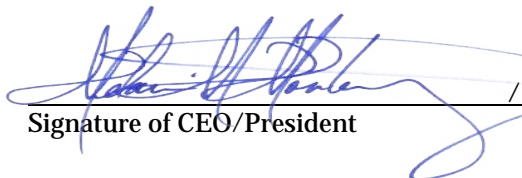
Management Safety Policy

The management of OCMI VI, Inc. dba COMPEO (“COMPEO”) is committed to the safety and health of our employees, leased employees, customers, and work sites. We are responsible for providing the resources necessary for employees to follow the *Workplace Safety Program* and other safety regulations related to our work. We will strive to set expectations for continual improvement as a safe Florida business.

At COMPEO management will participate in establishing and maintaining an effective safety program in accordance with the requirements of the *Workplace Safety Program* this includes:

- Provide each new employee with a general safety orientation containing information common to all employees and appropriate to the business operations before they begin their regular job duties.
- Provide job- or task-specific safety training appropriate for employees before they perform the job or task without direct supervision.
- Provide regular refresher training.
- Develop awareness and appreciation of safety through newsletters, periodic safety meetings, posters and safety incentive programs.
- Provide periodic self-inspection for hazard assessment when the safety program is implemented, new worksites are established, and thereafter as appropriate to the business operations, but at least annually.
- Including documentation of performance of activities for at least three years.

This policy statement serves to express this company’s commitment to and involvement in providing our employees a safe and healthy workplace.

	Melanie Montenegro	1/1/2023
Signature of CEO/President	Printed Name	Date

Our Plan

1. Safety and Health Orientation

Workplace safety and health orientation begins on the first day of initial employment or job transfer. Each new employee shall be given a general safety orientation containing information common to all employees and appropriate to the business operations before they begin their regular duties. Our plan will include:

- Accident and hazard reporting procedures,
- Emergency procedures,
- Fire safety,
- First aid,
- Personal protective equipment (PPE), and
- Worksite hazards.

Each employee has access to a copy of the written safety program, through his or her supervisor, for review and future reference, and will be given a personal copy of any safe work practices, policies, and procedures pertaining to his / her job.

2. Job- or Task-Specific Training

Safety training for employees will be conducted before they perform their job or task without direct supervision. This training will include:

- Specific safety rules, procedures and hazards.
- Identification of the employer's and employee's responsibilities regarding workplace safety.
- Conducted by personnel knowledgeable of the tasks.
- Conducted when the safety program is established, job assignments change, new substances are introduced into the workplace, and when a new hazard is identified.

3. Regular Refresher Safety Training

Regular refresher training will be conducted as outlined below:

- Be held on an annual basis and when necessary throughout the year.
- Contain material to maintain and expand knowledge and awareness of safety issues in the workplace.

4. Safety Awareness

COMPEO will provide a system for the employer and employees to develop an awareness and appreciation of safety. This will include:

- The company newsletters.
- Periodic safety meetings.
- Posters.
- Safety incentive programs when appropriate.

5. Hazard Assessment

It is the responsibility of Jose Reyes to provide periodic self-inspections for hazard assessment when the safety program was implemented or if new worksites are established. In addition, hazard assessment is performed as often as appropriate for our business operation, but at least annually. This assessment will:

- Identify hazards and unsafe conditions.
- Identify corrective action needed.
- Documents corrective action taken.

6. Documentation

All activities listed above will be documented and this documentation will be kept for three years.

- Documentation will include: date, time, location and description of training, inspections and corrective actions.
- In addition, participants involved with training, inspections, and trainers will be identified.

7. Responsibilities

Senior Managers / Managers

- Ensure that safety is adequately budgeted for the department, job and project.
- Communicate policies and procedures to all employees and make accessible within the department.
- Establish a system of recognition and awards for outstanding safety service or performance.
- Conduct periodic worksite inspections.
- Develop and enforce safety rules and safety practices / behavior.

Supervisors

- Ensure new-hire safety orientation is given to new employees and that all employees are trained before they start a new task.
- Ensure employees are given training that includes safe work practices on equipment, tools, machines, processes, etc.
- Conduct or designate qualified personnel to conduct periodic inspections of the workplace.
- Investigate all incidents and take immediate corrective action to prevent reoccurrence.

- Provide safety meetings on a regular basis and require attendance of all workers.

All Employees

- Never do anything that is unsafe in order to get the job done. If a job is unsafe, report it to your supervisor immediately.
- Never operate a piece of equipment unless you have been trained on it and authorized to use it.
- Report all unsafe or broken equipment or tools to your supervisor immediately.
- Report all unsafe conditions, work practices, or behaviors to your supervisor immediately. Horseplay, running and fighting are prohibited.
- Use your personal protective equipment (PPE) whenever it is required. Properly maintain all PPE in good working condition and wear correctly.
- Obey all safety warning signs.
- Report all work-related accidents and/or injuries to your supervisor immediately.

8. Accident/Incident Investigation Procedures

The supervisor at the location where the accident/incident occurred will perform an accident/incident investigation. Incidents can include property damage, near misses and work-related injuries and illnesses. These investigations are to assess the nature and the cause of the incident, not to place blame on personnel. Supervisors need to investigate accidents/incidents using procedures that include:

- Implement temporary control measures to prevent any further injuries to employees or damage to equipment, property or the public.
- Review the equipment, operations and processes to gain an understanding of the incident.
- Take written statements from witnesses and photograph the incident scene and any equipment involved.
- Document as soon as possible after the incident the condition of the equipment and anything else in the work area that may be relevant.
- Investigate causal conditions, unsafe acts, and a sequence of events leading up to the incident. Conclusions should be based on existing facts.
- Complete the incident investigation report.
- Provide recommendations for corrective actions.
- Indicate the need for additional or remedial safety training, if needed.

All accidents/incidents must be reported immediately to his / her supervisor. Incident investigation reports must be submitted to the designated management personnel as soon as possible after the incident.

SAFETY COMMITTEE

Purpose

COMPEO has an established safety committee. The purpose of our safety committee is to regularly bring workers and management together in a non-adversarial, cooperative effort to promote occupational safety and health in the workplace. It is an opportunity to assist the employer and make recommendations for change regarding safety issues. It is a joint effort to detect and correct workplace hazards, reduce injuries and illnesses, and increase safety awareness. The committee is visible and approachable for safety and health concerns, suggestions and problem solving.

Organization

The Safety Committee is composed of managerial and non-managerial representatives and hold regularly scheduled meetings, at least once every four months. In order to accomplish these objectives successfully, the committee is:

- Be of sufficient size and number to provide effective representation of the workforce and meet at least once every four months.
- Have more than one safety committee for employers with multiple sites.
- Improve workplace safety programs and identify corrective measures needed to eliminate or control recognized safety and health hazards.
- Our safety committee activities assist COMPEO in fact finding that may include:
 - Assessing and controlling hazards
 - Assessing safety training and awareness topics
 - Communicating with employees regarding safety committee activities.
 - Developing safety rules, policies and procedures.
 - Educating employees on safety related topics.
 - Evaluating the safety program on a regular basis.
 - Inspecting the workplace.
- Document and disseminate minutes of each meeting and other related activities. Records shall be maintained for at least three years.
- Communicate the purpose, activities and accomplishments of the committee to all employees and management (safety bulletin boards, newsletters, etc.).

Attached Resource: Safety Committee Meeting Minutes Form

Please see sample on pages 17-18

RETURN TO WORK

COMPEO offers a Return to Work program for the health and benefit of our valued employees and our company. Programs such as ours help injured employees return to meaningful, medically appropriate work—and their full compensation—sooner. They facilitate healing; help retain employees, lower medical and indemnity costs, and controls our company's workers' compensation premiums.

Our program includes:

- Active incident management tools, such as first injury reports, notification letters for physicians and work capacity analysis forms.
- Temporary transitional employment options that fit the injured employee's specific capabilities.
- Incident investigation to help prevent similar injuries in the future.

As an **employee, you must:**

- Report any workplace injury that requires medical attention of any kind to a supervisor or management immediately.
- Notify your physician of our Return to Work program and present a Work Capacity Analysis Form at the time of your initial exam (will be done by a supervisor in the event that the injured employee is medically unable).
- Check in with **Nakarys Morales** as soon as possible and maintain regular communication regarding your status and progress.
- Accept any temporary transitional duties approved by your physician and offered by this company to facilitate your return to the workplace.

Questions regarding our Return to Work program and policies should be directed to **Jose Reyes at 800-355-7741.**

As a **Supervisor, you must:**

- Train employees on the proper reporting and return to work procedures.
- If possible, accompany injured worker to medical provider to notify the provider about your company's Return to Work (RTW) program and provide an explanatory letter.
- Complete Initial Incident Investigation Form.
- Develop alternative assignments to meet the medical provider's assessment of capabilities—be sure to consult management, the injured employee and the RTW Specialist.
- Communicate with the company RTW Specialist.
- Supervise returning employees to ensure ongoing success with transitional duties.

SUGGESTED LANGUAGE FOR COMPANY POLICY MANUAL

For this program to be successful, injured employees must report all injuries to **Jose Reyes** on the same day of the incident. We will provide our injured employees with information about our RTW program and other materials that can be presented to the treating medical provider so a temporary transitional duty assignment can be designed as soon as possible.

Thank you, and please remember most injuries can be prevented.

Sincerely,
Jose Reyes

Compliance Director

I have read and understand the above:

Employee Signature: _____

Date: _____

Employee Safety Orientation

Instructions: Each employee must be given a safety orientation before beginning work. This checklist documents that each required item was explained to the employee. The supervisor is to place a check in each box after the item has been explained. Employees are not to sign this form unless all items have been explained and all questions have been answered satisfactorily.

The employee _____ has been:

- ✓ Told about parts of the written safety program that describe the employer's safety efforts.
- ✓ Given a copy of the employee safety manual and general safety rules and has read it.
- ✓ Told who his/her elected safety committee representative is.
- ✓ Told when required safety meetings are scheduled.
- ✓ Told to report all injuries and shown how to do this.
- ✓ Told to report all hazards to her/his supervisor and shown how to do this.
- ✓ Shown where the first aid supplies are located and who to call for first aid.
- ✓ Shown where the exits are located and the route from the assigned workstation.
- ✓ Told what to do during any emergencies that could be expected to occur.
- ✓ Shown how to operate a fire extinguisher.
- ✓ Trained on chemical hazards according to the Chemical Hazard Communication Program.
- ✓ Shown where to find the Material Safety Data Sheet (MSDS) file and program document.
- ✓ Taught how to read labels and use the MSDSs.
- ✓ Told generally what kinds of chemicals we use and their hazards.
- ✓ Informed about the hazards and precautions related to chemicals he/she will be using.
- ✓ Trained on safe methods to perform the job/task the employee was assigned.
- ✓ Given any personal protective equipment (PPE) required and trained on how to use and care.
- ✓ Provided any formal training required to do his/her job such as proper lifting, forklift operation etc.

The signatures below document that the above orientation was completed on the date below. Both parties accept responsibility for keeping our workplace safe and healthful.

Employee: _____ **Date:** _____

Supervisor: _____ **Date:** _____

Worksite Inspection Checklist

Date _____
Location _____
Inspector _____
Inspector _____
Inspector _____

General

- Is the safety bulletin board up and visible?
- Are safety committee/meeting minutes posted or communicated?
- Do employees know how to report unsafe working conditions?
- Are near miss and injury investigations conducted?
- Do employees know where the accident prevention program is and what it says?
- Are first aid kits well marked and accessible by employees at all times?
- Do employees know where and how to get first aid?
- Is each first aid kit complete? (A list of required items inside each kit is helpful)
- Are first aid trained employees cards current?

Emergency Evacuation & Emergency Exits

- Are emergency phone numbers posted where they can be seen from telephones?
- Are all exits and paths to/from exits free of obstructions?
- Are exits clearly marked?
- Are exit routes clearly marked and well lit?
- Do emergency lights work?
- Are doors that could be mistaken for a way of exit marked “Not an Exit” or with the name of the room?
- Can all exits be opened from the inside without a key?
- Do emergency alarms work?
- Are evacuation/fire drills conducted regularly?
- Do employees know where to gather?

Electrical

- Are extension cords used only for temporary use?
- Are power cords free of splices, taps, and damaged insulation?
- Do all extension cords have ground pins in place?
- Are live electrical parts on tools, equipment, building wiring, and electrical panels enclosed to prevent contact?
- Do circuits become overloaded? If so why?
- Are breaker boxes clear and can they be accessed when needed?

- Are machines that have moisture (e.g.: refrigerators, air conditioners) or used outdoors or in industrial settings grounded?
- Do electrical cords and equipment used at wet locations have waterproof covers or seals to keep moisture out?

Work Stations

- Are chairs are in good condition?
- Are the workstations adjusted for the person?
- Are materials stored safely?

Housekeeping

- Are toilets and washing facilities clean and stocked with supplies (soap, towels, toilet paper)?
- Is clean drinking water from a fountain or with individual drinking cups provided?
- If drinking water is supplied in containers, are they kept clean and closed?
- Are waste containers kept clean and emptied as needed?
- Is there effective drainage for wet areas?
- If you have nonpotable or not-fit-for-drinking water outlets, are they marked as such?
- Are scrap materials stored safely to prevent tripping, fire or pest hazards?
- Are spills cleaned up promptly?

Chemical Safety

- Is there a written hazard communication program? Is it accessible?
- Are employees trained in the program, safe use, and hazards of the chemical that they are exposed to?
- Can an employee find the MSDS for a chemical he/she is using and tell you about the hazards and required PPE?
- Do all chemical boxes, bottles, bags, tanks, etc. have a label that has the chemical name and appropriate hazard warning?
- Is the chemical list current?

Lighting

- Is there sufficient lighting in work areas?
- Are parking areas equipped with sufficient security lighting?
- Are temporary lights protected from accidental breakage?

Walking Surfaces/Stairways

- Are aisles and passageways kept clear of tripping hazards (cords, pipes, hoses etc.) and at least 28" wide?
- Is the floor free of holes, projections, or depressions that could cause trips, or let material fall on workers below?

- Are covers on holes or large openings in floors secure and capable of supporting the maximum load safely?
- Are floors able to hold the intended load safely?
- Are guardrails in place on the open sides of all walking surfaces 4' or more above an adjacent surface?
- Are guardrails 36" – 42" high and capable of withstanding 200 LB of force in any direction against the top rail?
- Are toe boards to catch debris installed on guardrails where people may work or walk on the surface below?
- Are stair tread surfaces non-slip, not excessively worn, and free of stored materials?
- Are walkways protected from or clearly visible to vehicle or forklift traffic?
- Are employees expected to work from heights? If yes, is fall protection provided?
- Are guardrails installed on stairways with four or more risers?
- Is there at least 7' of head room in all aisles and on all stairs?

Personal Protective Equipment

- Has a Personal Protective Equipment (PPE) hazard assessment been conducted for the job?
- Are employees trained in the use and care of their PPE?
- Does the furnished PPE fit?
- Is the PPE in good condition?
- Is the PPE appropriate for the job?
- Do employees wear the PPE when required?
- Is documentation of the training available?
- Are safety glasses worn where there is a potential for flying particles or objects?
- Are goggles or face shield worn where there is a danger of corrosive material splash?
- Is safety-toed footwear worn where there is a potential for heavy objects to roll or fall on the feet?
- Is a hard hat worn where there is a potential for being struck by a falling or flying object?
- Are ear plugs or ear muffs available and used in areas where it is necessary to raise your voice to be heard by a co-worker?
- Are gloves, aprons, or shields worn when there is a danger of cuts or chemical contact?

Portable Ladders

- Are ladders in good condition with tight joints between steps and rails, no missing parts, or damage?
- Are defective ladders removed from service?
- Are rungs and steps free of grease and oil?
- Do employees have both hands free when they are climbing up the ladder?
- Do employees use a longer ladder rather than use the top step of a stepladder?

- Do employees use a single or extension ladder rather than lean stepladder against a wall to climb?
- Are ladders raised at least 3' above an upper level if the employee will climb onto that level?
- Are ladders used at a 4 to 1 angle?
- Are employees using non-metallic ladders when working around electrical equipment?

Sprinkler Systems and Portable Fire Extinguishers

- Are fire extinguishers charged and mounted in their assigned, labeled locations? (Required monthly)
- Are fire extinguishers that do not pass inspection removed?
- Are defective fire extinguishers replaced?
- Are employees who are expected to use portable fire extinguishers trained?
- Is there a minimum 18" clearance below sprinkler heads?

Forklifts

- Are only trained and authorized employees operating forklifts?
- Do employees inspect the forklift at the beginning of each shift?
- Are noted deficiencies corrected in a timely manner?
- Do forklifts have a readable load chart attached?
- Are all forklift controls labeled and functioning?
- Are forklift horn, lights, tires, and lifting mechanism in good condition?
- Are aisle ways kept clear and visible?
- Do operators obey the rules of the road?
- If they are working from heights, do employees use fall protection?

Storage

- Are materials stored in a way that does not create a hazard (protected from slipping or collapse)?
- Are storage areas kept free of tripping and fire hazards?
- Are shelves capable of holding the intended load?
- Do employees have a safe way to stock and unstock the shelves?
- Do employees have to get on the shelves to get stock?
- If yes, are they using fall protection?
- Are storage racks tightly assembled and free of sagging from overload or damage by vehicle traffic?
- Is there safe clearance for forklifts through aisles and doorways and to allow placing and picking loads at elevation?
- Do employees use a safety cage with a forklift when necessary to manually retrieve materials from high shelves?
- Are hand trucks, carts, or hoists available and used for routine lifting or carrying tasks?

Portable Tools

- Has the employee been trained to use this tool?
- Are all the safeguards and devices there, working and working correctly?
- Is the employee wearing PPE?
- Is the extension cord safe?
- Is the tool the right tool for the job?
- Are hand-held tools properly grounded (3-wire cord) or marked as double insulated?
- Observe the work practice. Is it a safe one?

Employee Training Record

Employee Name: _____

Describe the Training	Date	Trained By

Initial Incident Investigation

Date of injury: _____ Time of injury: _____ Date and time of investigation _____

WHO was injured: _____

WHO else was involved in the incident: _____

WHO witnessed the incident: _____

WHAT was the employee doing when injured?

WHAT equipment, process or activity not described above may be related to the incident?

WHERE did the incident take place?

WHAT is the specific injury - include body part(s) and severity?

WHY did this injury occur to this person at this time? Describe immediate cause and all underlying (root) causes you can identify – continue to ask “why” for at least 5 levels of identified causes.

- 1.
- 2.
- 3.
- 4.
- 5.

HOW can similar incidents be prevented in the future: include management, employee, equipment, and environmental considerations?

Name and title of investigator: _____

Signature: _____

Safety Committee Follow-up: What preventative measures were put in place to permanently avoid recurrence of similar incidents?

Safety Committee Meeting Minutes

Keep a record of each safety meeting on file for 3 years.

COMPEO

Worksite Location: _____

Date: _____ Meeting Start Time: _____ Meeting End Time: _____

Attendance: (M)anagement or (E)mployee	M/E		M/E		M/E

Meeting Agenda:

Review minutes of previous meeting (date _____) for corrections/approval _____

Progress report on last meeting's "To Do" list.

Discuss hazards, concerns, self-inspections, other inspections etc. since our last meeting.

Review injury/near miss reports to determine if the causes were identified and corrected.

Suggested updates to our Accident Prevention Program.

Other concerns.

To Do List:

Assigned to:

Due Date:

Minutes written by: _____

Meeting Leader (signature required) _____

Next meeting _____ **Date:** _____ **Start Time:** _____ **Location:** _____

Additional attendance, members absent, guests, additional names from front:
