



Injury & Illness Prevention Plan (IIPP)

POLICY

Job Options, Incorporated (hereafter appearing as JOI *or* the Company), believe that everyone benefits from a safe and healthy work environment. We are committed to maintaining an injury-free and illness-free workplace, and complying with applicable laws and regulations governing workplace safety.

To achieve this goal, the Company has adopted an ***Injury and Illness Prevention Program (IIPP)***. This program is everyone's responsibility as we work together to identify and eliminate conditions and practices that reduce the benefits of a safe and healthy work environment.

RESPONSIBILITY

All employees are expected to work conscientiously to implement and maintain the IIPP program. Mr. Jeffrey Johnson, Chief Executive Officer, is the Program Administrator and has the authority and responsibility for implementing the provisions of this program. Where specifically stated, the Program Administrator has authorized Ms. Gladis Jarquin, Safety Officer, and/or the JOI Safety Compliance & Training Administrator, to act as his direct "designees". Any questions regarding the program should be directed to the Program Administrator or his designees.

Senior Management

Senior management will continue to set policy and provide leadership by participation, example, and a demonstrated interest in the program. Responsibilities include:

- developing policy
- allocating adequate resources
- ensuring responsibility
- reviewing and evaluating results

IIPP Program Administrator

The IIPP Program Administrator, or designees, is responsible for ensuring that all provisions of the IIPP are implemented. Responsibilities include:

- advising senior management on safety and health policy issues
- maintaining current information on local, state and federal safety and health regulations
- acting as liaison with government agencies
- planning, organizing and coordinating safety training
- preparing and distributing company policies and procedures on workplace safety and health issues
- developing a code of safe practices and inspection guidelines
- arranging safety inspections and follow-up to ensure that necessary corrective action is completed
- making sure that an adequate supply of personal protective equipment (PPE) is available

- establishing accident report and investigation procedures, and ensuring that injury and illness records are maintained (OSHA Log 300)
- reviewing injury and illness trends
- establishing a system for maintaining records of inspection, hazard abatement, and training.

Division Managers, Project Managers and Supervisors

Division Managers, Project Managers and all Supervisors are responsible through the Corporate Safety Officer and the Safety Compliance & Training Administrator for ensuring that employees know and abide by the Company policy and procedures on safety. They are expected to do everything within their control to assure a safe workplace in their area. Responsibilities include:

- keeping abreast of safety and health regulations affecting operations they supervise
- ensuring that each subordinate is able to and understands how to complete each assigned task safely
- conducting on-the-job safety training of those they supervise
- advising the Program Administrator or designee of training needs of subordinates
- making sure equipment and machines are in safe operating condition
- ensuring that employees under their direction wear required protective equipment
- correcting unsafe and unhealthful conditions within their power
- investigating accidents to discover root cause(s) and identifying corrective action(s) to prevent future occurrences
- conducting periodic inspections of their work areas according to the appropriate inspection checklist(s)

COMPLIANCE

Management is responsible for ensuring that Company safety and health policies and procedures are clearly communicated and understood by all employees. Managers and Supervisors are expected to enforce the rules fairly and uniformly.

All employees are responsible for using safe work practices, for following all safety directives, policies and procedures, and for assisting in maintaining a safe work environment.

Employees who make a significant contribution to the maintenance of a safe workplace, as determined by the Program Administrator or designee, will receive written acknowledgment that is maintained in the employee's personnel file. Additionally, the Company has implemented an incentive program to recognize worksite employees as a team, for working safely and complying with the Company's safety policies and procedures.

Employees who are unaware of correct safety and health procedures will be trained or retrained (see *Training* section).

Employees who deliberately fail to follow safe work practices and/or procedures, or who violate the Company's safety rules or directives, will be subject to disciplinary action up to and including termination (see *Safety & Health Compliance Process*).

Safety & Health Compliance Process

Health and Safety infractions will normally be addressed by disciplinary measures that are progressive and involve four steps; however, any of the following four steps may be omitted depending on the seriousness of the infraction, the past record of the employee and/or the circumstances surrounding the matter:

1. Should a safety and health violation be noted, the Project Manager or Supervisor shall informally discuss the behavior with the employee, stating the potential dangerous result and outlining the correct procedure, then retrain the employee to ensure understanding.
2. A second violation will generate either a formal verbal or a written warning to the employee, depending upon the severity of the violation.
3. A third infraction results in a formal written warning or employee suspension.
4. A fourth violation may lead to employee termination.

COMMUNICATION

The Company recognizes that open, two-way communication between management and staff on health and safety issues is essential to a safe, healthy and productive workplace. The following system of communication is designed to facilitate a continuous flow of safety and health information between management and staff in a form that is readily understandable:

- The New Employee Orientation will include review of the Company's IIPP and a discussion of policies and procedures that the employee is expected to follow. Each new employee will be provided a copy of the IIPP and the Hazard Communication Program (see *Employee Communication & Compliance* section).
- A dedicated Job Options Safety Website has been established to assist in the ongoing communication of safety-related news and information. All newly hired employees will be given information on how to access the website as well as how to subscribe in order to receive email notifications regarding safety-related matters, to include safety promotions and contests encouraging employee participation.
- The Company (Project Managers and Supervisors) will schedule a time at general employee meetings when safety is freely and openly discussed by all present. Such meetings will be regularly scheduled (but not less frequently than monthly) and announced to all employees so that maximum participation can occur.
- From time to time, the Company will post and/or distribute written safety notifications. Employees should check Company bulletin boards regularly for such posting(s). Safety-related memos and documents are to be read promptly. Questions about the meaning or implementation of this information should be directed to the Supervisor, Project Manager, Safety Officer or Safety Compliance and Training Administrator. Other methods of communicating pertinent health and safety information include the Company Safety Website, written notices distributed with paychecks, and/or electronic mail.

- All employees are encouraged to inform their Supervisor, Project Manager, the Program Administrator or designee of any matter which they perceive to be a workplace hazard and/or a potential workplace hazard. Employees are also encouraged to make safety suggestions and safety training suggestions.
- If an employee so wishes, he/she may make such notification anonymously by mailing it to the Safety Program Administrator at **Job Options, Inc., 3465 Camino del Rio South, Suite 300, San Diego, CA 92108**. A *Safety Concern Card* may also be used by the employee. An ample supply of Safety Concern Cards will be maintained in a visible area at each worksite for the use by all employees.
- **No employee shall be retaliated against for reporting hazards or potential hazards, or for making suggestions related to safety.**
- All suggestions will be reviewed by the Program Administrator or designee, who will initiate an investigation of each report of a hazard, potential hazard, or safety suggestion in accordance with Company procedures for hazard control.
- Any directives issued as a result of the investigation shall be distributed to all employees affected by the hazard, or shall be posted on appropriate bulletin boards.

WORKPLACE HAZARD EVALUATION / ABATEMENT

Hazard control is the heart of an effective IIPP program. The Company's hazard control procedure is: identify hazards that exist or develop in the workplace, describe how to correct those hazards, and initiate steps to prevent their recurrence.

Assessment of Hazards

Inspection of the workplace is our primary tool used to identify unsafe conditions and practices. While we encourage all employees to continuously identify and correct hazards and poor safety practices, certain situations require formal evaluation and documentation.

Along with each inspection/investigation, the Program Administrator or designee shall evaluate the severity of the hazard identified, and if it cannot be abated immediately, suggest priority for corrective action. The *Site Inspection Safety Checklist*, the *Site Inspection Report* or the *Incident Investigation Report* is to be used to document inspections/investigations.

- Routinely in each work area:

Prior to the periodic inspection, the inspector should review workplace injury reports and inspection reports which have been filed since the last investigation or inspection.

The *Site Inspection Safety Checklist* for the appropriate work area is to be used by the inspector(s).

- The introduction of new substances, processes, procedures or equipment present a new safety/health hazard:

Each Project Manager or Supervisor is responsible for promptly reporting to the Program Administrator or designee whenever a new substance (such as a chemical or solvent), new work procedure or technique, and/or new equipment is introduced which may pose a safety risk. This notification shall be done via email prior to the introduction of such item to the workplace. The written notification should include an evaluation of the potential hazard(s), training and/or other steps to be taken to provide abatement solutions for any potential hazard(s).

Based upon the information, the Program Administrator or designee will conduct an inspection and issue any directive(s) that may be necessary.

- The Program Administrator becomes aware of a new or previously unrecognized hazard, either independently or by receipt of information from an employee either verbally or through the submittal of written notification to include receipt of a *Safety Concern Card*.

From time to time the Program Administrator or designee may conduct unannounced inspections.

All investigations and findings shall be fully documented on a *Site Inspection* report and filed as directed in the *Recordkeeping* section.

Abatement of Hazards

It is the Company's intention to eliminate all hazards and unsafe work practices immediately. Some corrective actions require more time. Priority will be given to severe and imminent hazards.

The *Site Inspection Report* completed after the inspection/investigation will be used by the Program Administrator or designee to describe measures taken or to be taken to abate the hazard(s) or to correct the unsafe work practice(s). Actions to be taken may include, but are not limited to:

- fixing or replacing defective equipment
- implementing safer procedures
- installing guards, modifying equipment
- employee training
- posting warning notices

All such actions taken and the dates they are completed shall be documented.

When corrective action involves multiple steps or cannot be completed promptly, an action plan needs to be developed. The *Site Inspection Report* stating corrective action(s) required, will be used for this purpose and filed as directed in the *Recordkeeping* section. Formal written notification submitted by the Project Manager may also be submitted to report completion of any corrective action(s) taken.

While corrective action is in progress, necessary precautions are to be taken to protect or remove employees from exposure to the hazard.

Employees shall not enter an imminent hazard area without prior specific approval of the Program Administrator or designee. Employees expected to correct the imminent hazard shall be properly trained and provided with necessary safeguards.

ACCIDENT INVESTIGATION

The purpose of an accident investigation is to find the root cause of an accident and prevent further occurrences--**not** to assign blame.

A thorough and properly completed accident investigation is necessary to obtain facts. The investigation should focus on causes and hazards. Analysis of what happened and why it happened is aimed at determining how it can be prevented in the future.

Injury and Illness

The occurrence of an occupational injury and/or illness precipitates a document called *Injury or Incident Report*. This report is completed by the injured employee's Project Manager or Supervisor, and a copy of the report is to be sent to the Program Administrator via the designee and the Workers Compensation Administrator within twenty-four (24) hours of knowledge of the occurrence. Upon receipt, the Program Administrator or designee will ensure that:

- Fatalities and serious injuries or illness are reported **immediately** by phone or FAX to the nearest office of the Division of Occupational Safety and Health (CCR Title 8, Section 342).
- The incident is investigated by visiting the site and interviewing the victim(s) and witness(es), if warranted.

Accidents

The majority of accidents do not cause injury or illness, yet may result in property damage and/or lost time. Such mishaps usually indicate an unsafe act, faulty procedure or hidden hazard. Investigations of these occurrences are conducted at the discretion of the Project Manager, Division Manager, Program Administrator, or designee.

All investigation facts, findings and recommendations shall be fully documented and filed in accordance with the instructions in the *Recordkeeping* section.

TRAINING

Training is essential to maximizing the skills and knowledge of employees. It is the key to productivity.

The Company has a duty to include safety as an integral part of employee training. Employees need to work safely as well as productively and efficiently. The Project Manager and Supervisor are the essential links in ensuring the proper outcome.

Project Managers and Supervisors must know how to perform a designated job, and be aware of safety and health hazards facing employees under their immediate supervision. Project Managers and Supervisors are responsible for ensuring that they themselves and those under their direction receive training on general workplace safety, as well as on safety and health issues specific to each job.

With this in mind, training will be conducted with the following considerations:

Project Managers and Supervisors

The Program Administrator or designee will consult with Project Managers and/or Supervisors to determine training topics and needs of Project Managers and Supervisors. These include human relations, training skills, production/process skills, and familiarization with hazards and risks faced by employees.

Project Managers and Supervisors who recognize their own need for training are encouraged to submit a direct request for training in any area in which they feel deficient.

Employees

Project Managers and Supervisors are expected to assess training needs of all employees under their direction. They are to train those they supervise in general workplace safety and give them specific instructions regarding hazards unique to any job assignment, to the extent that such information was not already covered in other trainings (see *New Employee Safety Orientation Checklist*).

The Company recognizes that continuing safety and health training is needed for:

- Employees given a job assignment for which they have not previously received training. If the position is supervisory, such training shall include familiarization with hazards and risks faced by the employees under the Supervisor's direction.
- Whenever new substances, processes, procedures, or equipment pose a new hazard.
- Whenever the Supervisor, Project Manager, Division Manager, Program Administrator or designee becomes aware of a previously unrecognized hazard.
- All employees in periodic refresher safety training involving general workplace safety, job-specific hazards, and/or hazardous materials as applicable.

All training shall be documented on a training record form and filed as directed in the *Recordkeeping* section.

RECORDKEEPING

No operation can be successful without recordkeeping that enable the Company to learn from past experience and make corrections for future operations. In addition, the IIPP regulation requires records to be kept of the steps taken to establish and maintain the Company's Injury and Illness Prevention Program.

Injury and Illness Prevention Program Records

Each Project Manager and each Supervisor will maintain an updated copy of the Company's IIPP. The Program Administrator will retain the following records on file for at least three (3) years:

- master copy of IIPP, changes/updates
- documents verifying that the Company has maintained ongoing two-way communication with employees, such as:

- . memos and/or letters to employees on safety and health issues
- . new employee safety orientation session acknowledgment form
- . employee suggestions and Company response
- all records of inspections/investigations--including date, name of person who performed the inspection/investigation, unsafe conditions and work practices identified, corrective action taken and date of correction; forms and reports covered in this category include:
 - . Injury or Incident Report
 - . Site Inspection Checklist
 - . Site Inspection Report
 - . Response to Site Inspection Report
 - . Safety Concern Card
- records of safety and health training received by employees--containing the employee's name, training date, type of training and identification of trainer; examples are:
 - . New Employee Safety Orientation Checklists
 - . Employee Safety Training Attendance Logs

Copy to: All Job Options, Inc. Employees