

Safety and Health Program

Accident Reporting and Investigation Plan

This Accident Reporting and Investigation Plan prescribe methods and practices for reporting and investigating accidents. No matter how conscientious the safety effort at a company, accidents happen occasionally due to human or system error. Therefore, this written plan is intended to provide a means to deal with all workplace accidents in a standardized way and demonstrate our company's compliance with the reporting requirements of OSHA 29 CFR 1904. In addition, it is the policy of the company to comply with all workers' compensation laws and regulations.

Administrative Duties

The Safety Director is responsible for developing and maintaining this written Accident Reporting and Investigation Plan. The Safety Director is solely responsible for all facets of the plan and has full authority to make necessary decisions to ensure the success of this plan.

The Safety Director is also qualified, by appropriate training and experience that is commensurate with the complexity of the plan, to administer or oversee our Accident Reporting and Investigation Plan and conduct investigations.

Employees may review a copy of our Accident Reporting and Investigation Plan. The Safety Director may amend our written program.

Accident Reporting Procedures

In the event that an accident/incident occurs, employees must report the injury to their Superintendent/Foreman or Safety Personnel immediately. Near miss accidents/incidents need to also be reported.

Superintendents must immediately notify the Safety Director when an accident/incident occurs, and complete an Incident-Near Miss Report. Once completed, the Incident-Near Miss Report needs approved by the Safety Director.

If any employees witness an accident at work, they should call for emergency help or assistance to help calm injured employee. The witness should immediately report the accident to their supervisor, complete a written statement, and aid in answering questions related to the Incident-Near Miss Report and Accident Investigation.

The company President and Eastern Alliance shall be notified of all accidents by receipt of a completed accident report within 24 clock hours of the accident/incident.

Accident Investigation Procedures

Thorough accident investigations will help the company determine why accidents occur, where they happen, and any trends that might be developing. Such identification is critical to preventing, controlling

and mitigating hazards. The Superintendent, with help of the Safety Director, will perform the following duties:

- Conduct the accident investigation at the scene of the accident/incident as soon after as safely possible.
- Interview the employee involved in the accident/incident and any witnesses. This should be done individually, and should be in their words.
- Repeat the employee's version of the event back to them and allow the employee to make any corrections or additions.
- After the employee has given their description of the event, ask questions that focus on causes.
- When finished, remind employees the investigation was to determine the cause and possible corrective action that can eliminate the cause of the accident.
- Complete an accident investigation report with the employee and review data for accuracy.

The accident investigation report is used to:

- Track and report injuries on a annual basis;
- Group injuries by type, cause, body part affected, time of day, and process involved;
- Determine if any trends in injury occurrence exist and graph those trends if possible;
- Identify any equipment, materials, or environmental factors that seem to be commonly involved in injury incidents;
- Discuss the possible solutions to the problems identified;
- Proceed with improvements to eliminate the likelihood of future injuries.

Injury, Illness, and Medical Issues

If a workplace accident results in a fatality, inpatient hospitalizations of one or more employees, amputation, or loss of an eye, the Safety Director or main office reports the incident within eight hours by phone or in person to the nearest OSHA office by calling 1-800-321-OSHA (6742).

If an injured person is taken to a doctor, a statement from the doctor will be attached to the Incident-Near Miss Report.

Employees with workplace injuries resulting in time off work will be put in the company's Return to-Work Program to facilitate their full recovery and resumption of original work.

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 employee ordinarily works on Sunday.)

If the disability continues for more than seven calendar days, workers' compensation goes back to day one.

On the day of injury, the company will cover the time loss due to doctor and/or emergency room visits or inability to work, up to a maximum of 12 hours.

Penn Installations Page | 2

Recordkeeping

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

- OSHA 300 Log and Summary of Injuries and Illnesses
- OSHA 300A Log of Work Related Injuries and Illnesses
- Accident Investigation Reports
- Training Records

Annual Summary Posting

At the end of each calendar year, The Safety Director will review the accident/incident reports; complete the OSHA 300 and 300A forms. The OSHA 300A form will be posted the following year from February 1st to April 30th. It will be posted in a conspicuous place at the office locations and project sites.

Employee Involvement and Training

This plan is an internal document guiding the action and behaviors of employees; therefore they need to be aware of it and abide by it. To communicate the accident reporting and investigation plan, all employees are given a thorough explanation as to why the new plan was prepared and how individuals may be affected by it.

The information and requirements of this written plan are presented to employees during new hire orientation, annual training or at job safety briefs.

Penn Installations Page | 3