



Health and Safety Policy And Procedures

DEHNCO Equipment & Supplies Co., Inc.

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1. Health and Safety Policy Statement

Management, employees, and contractors of DEHNCO Equipment & Supply Co., Inc., hereafter referred to as "DEHNCO," must have a common objective to be successful. Our objective is for all activities to be healthy, safe, environmentally sound, and productive operation. We have an obligation to preserve the human, physical, and financial resources of our company. Workers' safety and health will always be our #1 priority in satisfying this obligation. As such, this basic policy must be considered in every phase of our business, including acquisition, job planning, job setup, and performance. Accordingly, our principal objectives are to:

- Provide a work environment that is free of unmitigated recognized hazards
- Comply with all laws that regulate worker safety, health, and our environment
- Recognize the priority of safety and health factors over purely economic considerations
- Hold each worker accountable for the safe execution of all jobs assigned and full compliance with all environmental, safety, and health-related procedures and training
- Train our workers in safe and proper job procedures and required compliance with established procedures, policies, and practices
- Provide comprehensive New Employee Safety Training to all new hires
- Promote worker health and safety both on and off the job
- Maintain leadership in safety and accident/incident prevention by continuously improving safety performance and work methods and procedures

First-line supervision has the most significant impact and, thus, the greatest opportunity to influence and promote safe work practices among our workforce in the field. Preventing accidents/incidents requires everyone's concerted effort and daily attention. Everyone has equal authority and responsibility to take appropriate action to correct unsafe acts/or conditions.

A properly planned and executed job will eliminate the chance for losses and return benefits that satisfy needs in each of these areas:

- Health, Safety, & Environment
- Cost
- Quality
- Morale
- Production
- Customer Satisfaction

All workers will contribute to the DEHNCO environmental, health, and safety program by following all policies and procedures, bringing unsafe conditions/acts to management's attention, and recommending actions to improve the program's effectiveness. Supervisors shall insist that workers observe and follow every rule and regulation necessary for the safe conduct of work and shall take any necessary action to obtain compliance.

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Jeff A. Dehnert
President

2. Introduction

At DEHNCO Equipment & Supplies Co., Inc. (DEHNCO), we recognize health and safety as a fundamental human right. Everyone deserves a safe and secure workplace, free from preventable risks. Our policy is designed to protect well-being, prevent hazards, and ensure compliance with safety regulations. Maintaining a safe workplace is a shared responsibility. We foster a culture that prioritizes all individuals' health, safety, and dignity by adhering to safety procedures, reacting fast to safety concerns, and continuous improvement.

3. Purpose

The purposes of this policy are:

- Identifying and mitigating workplace hazards to prevent accidents and injuries.
- Promoting a safety culture through compliance with all relevant health and safety regulations.
- Providing employees with the necessary training, resources, and support to work safely.
- Encouraging open communication, hazard reporting, and continuous improvement in workplace safety.

By implementing these principles, we aim to protect the well-being of all employees, visitors, and contractors while fostering a proactive and safety-conscious workplace.

4. Applicability

This policy applies to all our employees.

5. Health and Safety Qualitative and Quantitative Goals

At DEHNCO, we prioritize our employees' health, safety, and well-being by fostering a secure, supportive, and proactive workplace in preventing risks. A safe work environment is essential for productivity, job satisfaction, and overall well-being, and we are committed to maintaining the highest workplace safety standards.

Our Focus Areas: We strive to create and maintain a work environment where safety is a shared responsibility. Our efforts include:

- Safe Workspaces – Regular risk assessments and preventive measures to ensure a hazard-free environment.
- Emergency Preparedness – Clear protocols for fire safety, severe weather, medical emergencies, and workplace security.
- Ergonomic Work Practices – Optimized workstation setups, posture awareness, and movement to prevent injuries.
- Mental Health and Well-being – Work-life balance initiatives, stress management resources, and Employee Assistance Programs (EAP) for mental health support.
- Ongoing Training and Awareness – Continuous education on safety protocols, emergency response, and best practices.

Setting clear goals and improvement plans ensures that health and safety remain prioritized at DEHNCO. We continuously review and enhance our safety initiatives, working together to create a workplace where employees feel protected, valued, and empowered to thrive.

DEHNCO Health and Safety Goals: Quantitative and Qualitative

- **Quantitative Goal:**
 - Maintain a goal of zero (0) health and safety incidents annually, starting from a baseline of zero (0) in 2024.
 - 100% of our employees with the full set of health and safety training by 2026

- **Qualitative Goals:**
 - Promote a workplace culture that prioritizes physical and mental well-being through continuous training, proactive awareness, and open communication.
 - Evaluate and enhance ergonomic standards by assessing workspaces, identifying areas for improvement, and implementing solutions to reduce strain-related injuries and improve employee comfort.

6. Prevention of Health and Safety Incidents

Preventing health and safety risks in the workplace requires the active participation of everyone, from management to employees. While policies and procedures provide a framework for safety, their effectiveness depends on individuals consistently following the rules, staying aware of potential hazards, and taking proactive measures to maintain a secure environment. This includes practicing good ergonomics, keeping workspaces free from obstructions, adhering to fire and emergency protocols, and prioritizing mental and physical well-being in an office setting.

7. Responsibilities

- **Management** is responsible for providing a safe workplace, identifying and mitigating hazards, and ensuring compliance with safety laws.
- **Employees** must follow safety procedures, report hazards, and contribute to maintaining a safe work environment. Familiarize with emergency exits and evacuation routes, participate in emergency drills, and immediately report any hazards or safety concerns to management.
- **Visitors and Contractors** must comply with all office safety rules and guidelines.

8. Risk Assessment and Control

PURPOSE

The purpose of this program is Hazard Identification and Risk Assessment Control. The program should be used as a tool to help identify and evaluate existing and potential hazards on all DEHNCO worksites and methods to control and eliminate the identified hazards.

PROCEDURES

General

The hazard identification process is used for routine and non-routine activities and new processes, changes in operation, products, or services as applicable. All workers shall be trained on workplace hazards and how to identify, report, and control them. The assessment process must be completed before the start of all jobs to identify existing or potential hazards to workers and eliminate or control these hazards using engineering or administrative controls, proper training, or the use of personal protective equipment (PPE). All company workers should be trained on hazard identification and risk assessment.

All workers are required to take a proactive approach to managing and reporting hazards. When they observe a hazard, they are required to take steps to correct that hazard directly (provided they are adequately knowledgeable/trained to safely do so) and eliminate the hazard or get assistance from appropriate workers to do so whenever reasonably

possible. Where hazards cannot be eliminated immediately, workers should take necessary steps to warn others of the hazard. Always report hazardous or potentially hazardous conditions and acts to a supervisor or competent person.

Risk Assessment

At DEHNCO, Risk assessments are conducted every two years or whenever changes occur to office equipment, weather, or facilities.

Classification

Hazards are classified and ranked based on severity. The program identifies that hazards are classified/prioritized and addressed based on the risk associated with the task. (See the risk analysis matrix outlining severity and probability). Ranking or prioritizing hazards is one way to help determine which hazard is the most serious and thus which hazard to control first.

Priority is usually established by considering the worker exposure and the potential for accident, injury, or illness. By assigning a priority to the hazards, you are creating a ranking or an action list. Hazards are to be mitigated through a prescribed hierarchy of controls. The hierarchy of controls includes elimination as the preferred control followed by substitution, engineering, administrative, and personal protective equipment (PPE).

The following factors play an important role:

- Percentage of workforce exposed
- Frequency of exposure
- Degree of harm likely to result from the exposure

Probability of Occurrence

There is no single, simple way to determine the level of risk. Ranking hazards requires the knowledge of the workplace activities, urgency of situations, and most importantly, objective judgment. One option is seen in the following examples:

Probability Index of Occurrence Example:

- Likely to occur immediately Could happen any day
- Probable in time Likely to happen if conditions are repeated
- Possible in time Under the right conditions, the incident might be repeated
- Remotely possible Even under similar conditions, it is unlikely the incident will be repeated

For the activity being examined, determine the most likely reasonable level of severity (levels 1 through 4 in the above example). Then determine how likely (the probability) the injury would be (letters A-D). For example, being hit by a low-speed car is most often a level 2 injury but is barely possible for someone who works a kitchen job (level D). However, put that same worker wearing all black on a roadside at night replacing roadside light bulbs and the probability increases to level A and the severity to 1 (fatality reasonably likely).

Risk Definitions

Risk is the chance or probability that a worker will be harmed or experience an adverse health effect if exposed to a hazard. It may also apply to situations with property or equipment loss.

- 4 - Low Activities in this category contain minimal risk and are unlikely to occur. Organizations can proceed with these activities as planned.
- 3 - Medium Activities in this category contain minor to serious risks that are remotely likely to likely to

occur.

- Application of proactive risk management strategies to reduce the risk is advised. Organizations should consider ways to modify or eliminate unacceptable risks.
- 2 - High Activities in this category contain unacceptable levels of risk, including catastrophic and critical injuries that are highly likely to occur. Organizations should consider whether they should eliminate or modify activities that still have a “high” rating after applying all reasonable risk management strategies.
- 1 - Extreme Activities in this category should not be allowed to proceed without very careful planning. DEHNCO needs to evaluate whether the activity is necessary in the first place.

Once the risk has been assessed, the appropriate controls shall be implemented. The following describes how identified hazards/risks are addressed and mitigated.

The main ways to control a hazard include:

- Elimination (including substitution): Remove the hazard from the workplace.
- Engineering Controls: includes designs or modifications to plants, equipment, ventilation systems, and processes that reduce the source of exposure.
- Administrative Controls: controls that alter the way the work is done, including the timing of work, policies and other rules, and work practices such as standards and operating procedures (including training, housekeeping, equipment maintenance, and personal hygiene practices).
- PPE: equipment worn by individuals to reduce exposure, such as contact with chemicals or exposure to noise.
- Develop Safe Practices/ Engineering Controls to Mitigate Risk.

9. Orientation

Management and supervision will ensure each new employee participates in DEHNCO’s Health and Safety Orientation process and reviews all necessary site and project specific health and safety information.

The safety orientation must, at a minimum, include the following elements:

- Review of DEHNCO’s Health and Safety Policy
- Overview of applicable health and safety legislation including employee right to refuse unsafe work
- Overview of DEHNCO Health and Safety program including:
 - Health and Safety responsibilities
 - Risk Assessment & Control
 - Company Rules & Safe Work Procedures
 - Disciplinary Policy
 - Drug & Alcohol Policy
 - Workplace Violence Policy
 - Personal Protection Equipment
 - Fire Protection & Fire Extinguisher
 - Incident Reporting
 - Emergency Response
- Any additional regional/divisional health and safety requirements as deemed necessary by local management

Employee		Supervisor	
	Date		
	Topic	Employee initial	Supervisor initial
	1. Review and provide copy of company safety policy and program		
	2. Review Health and Safety Responsibilities & Right to refuse unsafe work		
	3. Company Rules & Safe Work Practices		
	4. Disciplinary Policy, Drug & Alcohol Policy and Workplace Violence Policy		
	5. Fire Protection & Fire Extinguisher Use		
	6. Requirements for Personal Protective Equipment		
	7. Incident reporting and investigation procedures		
	8. Location of: <ul style="list-style-type: none"> ▪ First aid ▪ Fire extinguishers ▪ Telephones ▪ Emergency numbers 		
	9. Emergency procedures details		
	10. Location of parking, lunch area, and toilets		

10. General Policies

- **General Compliance with Health and Safety**
DEHNCO complies with all national health and safety laws, regulations, and procedures.
- **Document Maintenance/Workers Accessibility and Awareness**
All documents required by applicable laws (such as health and safety policies and emergency procedures) must be accessible to the employees.
- **Notification and Record Maintenance**
DEHNCO will promptly notify the relevant national and local authorities of work-related illnesses or accidents, as applicable laws mandate. Records of illness, safety incidents, accidents, and emergencies must be kept on-site for at least one year or longer, as stipulated by legal requirements.
- **Permits and Certificates**
DEHNCO maintains all required permits and certificates related to health and safety. This includes ensuring compliance with sanitation permits for facilities, conducting regular vehicle inspections, and obtaining necessary driver permits if providing transportation services.
- **Housekeeping Rules**
Good housekeeping and sanitation are the responsibility of every employee of DEHNCO. Each employee is obligated and accountable to help maintain a clean and healthy workplace environment. This includes the washroom and lunchroom facilities. A clean, safe workplace can be maintained by following these simple rules.
 - Keep your work area clean and orderly.
 - Keep all exits clear of obstructions.
 - Keep all fire extinguishers clear of obstructions.
 - Clean your work area at the end of each shift.
 - Keep utility knives, scissors, and other pointed or sharp instruments adequately stored when not in use.
 - Use only designated smoking areas.
 - Do not deface or write on company property.
 - Notify a Team Leader or Manager of any condition that could cause others to slip, trip, or fall.
 - Put trash and recycling in the containers provided.
 - floors should be kept dry and free from clutter.
 - Cables and wires must be adequately secured to prevent tripping hazards.
 - Office equipment should be regularly maintained and reported if faulty.
 - All workplace facilities, including toilets, canteens, and kitchen, must be maintained clean, safe, and compliant with all applicable sanitation, safety, and health regulations.

11. Complaint Procedure

At DEHNCO, we are committed to fostering a safe and respectful workplace where employees feel empowered to express concerns without fear of retaliation. Our Health and Safety Complaint Procedure aligns with the Grievance Mechanisms outlined in the Employee Manual, which provides full details on the reporting process.

Employees can voice concerns through multiple channels:

- **Open-Door Policy** – Directly discuss issues with managers.
- **Direct Access to HR & Senior Management** – Escalate concerns beyond immediate supervisors.

- **Anonymous Reporting** – Submit confidential feedback via [DEHNCO's website](#).

DEHNCO ensures a structured and timely resolution process, with an initial review by management, followed by an HR review if further escalation is needed. A prompt response is prioritized, and every complaint is handled professionally and fairly.

For detailed procedures, including timelines and escalation steps, employees should refer to the Employee Manual.

12. Stop Work Authority

PURPOSE

The purpose of this policy is to ensure that all workers are given the responsibility and authority to Stop Work when they believe that a situation exists that places them, coworker(s), contractors, or the public at risk or in danger pertaining to the service provided by DEHNCO; hereafter referred to as “DEHNCO”. A worker’s responsibility and authority to Stop Work also includes situations, that if allowed to continue, could adversely affect the safe operation, or cause serious damage to a facility or equipment, or adversely affect the environment.

SCOPE

This policy applies to all DEHNCO locations, work sites, and areas. It is applicable to all company workers working at these locations.

PROCEDURES

A Stop Work intervention should be initiated for conditions or behaviors that could reasonably be expected to pose a risk or danger to worker(s), safe operation of a facility, serious damage to equipment or adversely affect the environment. Situations that warrant a Stop Work intervention may include, but are not limited to the following:

- Unsafe conditions
- Change in conditions
- Equipment used improperly
- Lack of knowledge, understanding or information
- Clarify work instructions
- Propose additional controls

Any Stop Work issue(s) requiring corrective action(s) to resolve the issue(s), shall be documented on a Stop Work Authority Form

Steps of Stop Work Authority

1. Stop - When a worker(s) perceives conditions or behaviors that pose imminent danger, they must immediately initiate a stop work intervention.
 - i. Workers are protected from retribution or reprimand for exercising SWA. Any form of retribution or reprimand will not be tolerated against workers who exercise SWA.
2. Notify - Notify affected workers and supervision of the stop work action.
3. Investigate - Affected workers will discuss the situation and come to an agreement on the stop work action.
 - i. No work can resume once SWA is exercised until all issues and concerns have been addressed.

4. Correct – Take immediate or as soon as possible actions to rectify the known unsafe act or condition
5. Corrective actions - Will be made according to the corrections agreed upon in the investigation to prevent a recurrence of the unsafe act or condition.
6. Resume - All affected workers will be notified of what corrective actions were implemented and work will resume only when it is safe to do so.

13. Incident Investigation

PURPOSE

The purpose of the Incident Investigation Policy is to make certain that incidents are investigated according to the injury, or injury potential of an event, in accordance with company requirements. This will help to control further losses of human and material resources by identifying and correcting unsafe acts and conditions that lead to an incident. This policy applies to all work-related incidents and near misses that affect employees and others who are performing work for DEHNCO.

POLICY

All safety incidents, including work-related injuries, accidents, near misses, and property damage will be reported and investigated to determine root causes, and recommendations will be developed, communicated, and implemented to prevent recurrence of the incident. This policy applies to all workers, contractors, and associates on DEHNCO locations. All entities working with DEHNCO are required to report all incident types to management, supervisors, and/or safety representatives. If the incident requires medical attention, it should be reported as soon as the medical situation has been brought under control.

RESPONSIBILITIES

Management

- Management will participate in the investigation of all incidents to the appropriate level with regards to incident severity.
- Management will review all accidents/injuries and implement corrective action and safety modification and/or employee training as recommended by the incident investigation.
- Will ensure proper case management, accident/incident processes, investigation methods, and reporting are carried out according to company guidelines.

Worker

- Workers are responsible for immediately informing supervisors of accidents, near-miss events, unsafe conditions, unsafe equipment, and known unsafe practices.
- Workers are responsible for reporting any incident or near miss immediately.
- Workers shall participate in the incident investigation unless they are unable to do so as a result of injury.
- Workers may choose to report a near miss using DEHNCO's form Incident Near Miss Reporting or verbally to their supervisor, who will be responsible for completing the document
- Safety Representative
- Responsible for assisting in the investigation of an incident and ensuring the case is managed appropriately, working with supervisors and other responsible managers.
- Utilizing information collected during the investigation of incidents and near misses to help improve and maintain safety overall.
- Monitor corrective actions to remedy an unsafe working condition, facility, equipment, location, or practice.

PROCEDURES

All safety incidents are to be investigated in a timely manner (no more than 24 hours) to determine the root cause(s) and contributing factors involved. The extent of the investigation depends on a number of factors including the severity or potential severity of the incidents. All evidence such as people, positions of equipment, parts, and papers must be preserved, secured, and collected through notes, photographs, witness statements, flagging, and impoundment of documents and equipment.

Respond to the Incident Scene Immediately: If the incident results in an employee injury or illness, make sure that the affected employee receives immediate medical attention. Take actions necessary to prevent or minimize the risk of additional injury or illness in the area.

Secure the Incident Scene: The scene of the event should be left intact to the greatest extent possible, with nothing moved or disturbed until the investigation is complete. Use barricades, signs, or other means to isolate the site, warn of hazards, and otherwise restrict access.

Preserve Evidence: Before and during the investigation, make a prompt and careful effort to preserve the evidence that is necessary to answer the key questions about the incident (who, where, what, when how and why). Observe and record perishable or environmental evidence (such as instrument readings, control panel settings, and weather conditions). Use photographs, sketches, and diagrams to record evidence or conditions. Make detailed notes about any photographs, sketches, or diagrams made.

Identify Witnesses: When arriving at the scene, identify the individuals who were either involved in the event or saw it happen. Ask them to identify others who were also in the area and make a list of these names. Separate witnesses. Have each complete a witness statement and sign.

Interview Witnesses: Interview witnesses individually and as soon as possible after the event. Interview the people directly involved first (if Possible), then eyewitnesses and observers.

Complete Investigation Report to include:

- Activity in progress at the time of the event
- Sequence of events leading to the event
- Emergency response to the event
- Medical treatment provided by first responders to the injured/ill employee
- Direct contributing factors
- Corrective actions taken or planned (including estimated completion dates)
- Name(s) of individual(s) responsible for corrective actions

Corrective Actions

Management's initial findings and any immediate corrective actions must be documented and sent to DEHNCO's representative or designee within 24 hours of notification of the incident. Near-miss reports are to be sent to DEHNCO's representative or designee within 48 hours. DEHNCO's representative or designee will review each incident to ensure that the investigation was thorough, all immediate corrective actions are completed, and longer-term follow-up actions are clearly defined, with adequate schedules and resources for completion.

Reporting Requirements

Time elements of when an incident should be reported

DEHNCO will verbally report fatality and catastrophic incidents to OSHA within 8 hours of discovery. For any in-patient hospitalization, amputation, or eye loss DEHNCO must report the incident within 24 hours of discovery to OSHA. OSHA requires reporting of work-related incidents resulting in the death of an employee or the hospitalization of one or more workers within 8 hours.

Incident Report	
Attention: This form contains information relating to worker health and must be used in a manner that protects the confidentiality of workers to the extent possible while the information is being used for occupational safety and health purposes.	
Worker	Male / Female
Phone #	Date hired
Street Address	Date of incident
City	Time of incident
State / Zip	Time worker began work
Date of birth	Supervisor
Site/Location (facility name) and Unit or Project:	
Name of physician or other health care professional:	
If treatment was given away from the worksite, where was it given?	
Was emp. treated in an emergency room?	Yes or No
Was emp. hospitalized overnight as an in-patient?	Yes or No

First Aid	<input type="checkbox"/>	Medical Non-Disabling	<input type="checkbox"/>	Equipment Damage	<input type="checkbox"/>
Near Miss	<input type="checkbox"/>	Restricted Work Case	<input type="checkbox"/>	Fire or Release	<input type="checkbox"/>
Motor Vehicle Accident	<input type="checkbox"/>	Lost Time Case	<input type="checkbox"/>	Non-Occupational	<input type="checkbox"/>

INCIDENT		
Description of the incident (who, what, how, when, why, and what was the worker doing just before the incident occurred)?		
Prepared By:	Title:	Date:
Report Routed To?		

14. Mental Health and Well-being

At DEHNCO, mental health is as important as physical health in creating a productive, positive, and fulfilling work environment. We recognize that a healthy mind is essential for productivity, job satisfaction, and personal well-being. We aim to foster a workplace culture where employees feel supported, respected, and empowered to care for their mental health while maintaining professional success.

To achieve this, we are committed to the following:

- **Encouraging Regular Breaks** – We understand that constant work without rest can lead to burnout and decreased productivity. We support employees taking short, frequent breaks to step away from their desks, stretch, and reset their focus. This helps reduce stress, prevent fatigue, and maintain overall well-being throughout the workday.
- **Providing Mental Health Resources** – We offer access to Employee Assistance Programs (EAP) to help employees manage stress, work-related challenges, and personal concerns. These resources provide professional support, counseling, and guidance to those needing it, ensuring that employees have a reliable system for mental health support.
- **Creating a Positive and Inclusive Work Environment** – A workplace built on open communication, mutual respect, and inclusivity fosters emotional well-being and team cohesion. We encourage employees to voice concerns, share ideas, and seek support without fear of judgment. By maintaining a culture of collaboration and respect, we ensure that everyone feels valued and heard.
- **Maintaining a Harassment-Free Workplace** – DEHNCO is committed to providing a safe, respectful, and inclusive work environment. Harassment, bullying, or discrimination of any kind will not be tolerated. We promote zero tolerance for toxic behaviors and ensure that all employees feel secure and comfortable in their workplace.
- **Balancing Business Demands with Employee Well-being** – While we understand the demands of our industry, we strive to balance workload expectations with employee well-being. We encourage reasonable workloads, flexible work arrangements when possible, and supportive practices that help employees maintain a healthy equilibrium between work and personal life. We help employees stay engaged, motivated, and mentally healthy by prioritizing work-life balance.

15. Ergonomics

Proper ergonomics in the workplace is essential for preventing strain, discomfort, and long-term health issues. A well-designed office environment promotes employee well-being, productivity, and safety. Key ergonomic considerations include:

- **Posture Awareness** – Maintain a neutral spine position, keep feet flat on the floor, and ensure wrists are correctly aligned to prevent musculoskeletal strain.
- **Workstation Setup** – Design workstations, including seating, standing arrangements, and tool accessibility, to minimize physical strain on workers. Use adjustable chairs, position eye-level monitors, and arrange keyboards and mice to support natural hand and wrist movement.
- **Frequent Movement** – Take regular breaks to stretch, adjust posture, and reduce eye strain from prolonged screen exposure.

- **Proper Equipment Use** – Utilize ergonomic accessories such as wrist supports, footrests, and standing desks to enhance comfort and reduce fatigue.
- **Lighting and Screen Positioning** – Adjust screen brightness and position to minimize glare and reduce eye strain.
- **Lifting Techniques**- Provide training on proper lifting techniques and supply employees with necessary items like lifting belts.

16. Personal Protective Equipment Program

PURPOSE

The purpose of the Personal Protective Equipment (PPE) Program is to develop and implement the procedures for the identification, use, care, and maintenance of PPE required to be used by workers to prevent illness and injury.

All workers are required to follow the minimum procedures outlined in this program.

SCOPE

Even though DEHNCO operates in an office environment, certain tasks require using PPE to ensure employee safety. Employees must wear appropriate PPE whenever necessary. This policy applies to all PPE use related to DEHNCO's premises and operations.

PROCEDURES

General Requirements

While DEHNCO operates in an office environment, some tasks may require PPE, including:

- **Eye Protection:** Safety glasses or goggles when handling chemicals, working in maintenance areas, or using tools.
- **Hand Protection:** Gloves when handling cleaning supplies, minor repairs, or materials that may cause irritation or injury.
- **Hearing Protection:** Management will select and require employees to wear appropriate hearing protection in environments where noise levels equal or exceed the OSHA Occupational Noise Exposure Standard (OSHA 29 CFR 1910.95) 8-hour time weighted average (TWA) of 85 Dba. For example, earplugs or earmuffs in areas with excessive noise, such as near machinery or construction work.
- **Slip-Resistant Footwear:** Required when accessing storage areas.
- **Respiratory Protection:** Masks or respirators when exposed to dust, fumes, or airborne particles.

17. Emergencies Procedures

This Emergency Action Plan (EAP) is designed to protect employees, visitors, and contractors by outlining procedures for responding to emergencies in an office setting. The plan ensures prompt action, minimizes risks and complies with OSHA and state safety regulations.

Below are examples of potential emergencies that may arise:

- Fire
- Severe Weather (Tornadoes, Thunderstorms, Snow/Ice Storms, Flooding)
- Medical Emergencies
- Power Outages
- Workplace Violence/Active Shooter

Evacuation Requirements

All required and recommended elements for safe evacuation must be followed, including clear exit routes, updated evacuation plans, visible signage, adequate lighting, regular training and drills, accessible exits, effective communication systems, necessary emergency equipment, and designated assembly areas:

- **Posting Evacuation Plans:** Ensure evacuation plans are visible and easily accessible.
- **Installation and Maintenance of Fire Alarms:** Regularly install and maintain fire alarm systems.
- **Installation and Maintenance of Emergency Lighting:** Ensure emergency lighting is installed and maintained.
- **Clear Aisles and Exits:** Ensure aisles and exits are not blocked and workers have unobstructed access within their workstations.
- **Employee Education and Training:** Provide education and training for all employees on evacuation procedures.
- **Evacuation Procedures and Fire Drills:** Conduct regular fire drills and ensure workers are trained in evacuation procedures.

General Evacuation Procedures

- **Fire or Structural Damage:** Employees must evacuate immediately using designated emergency exits. Do not use elevators. Assemble at the designated meeting point outside the building.
- **Severe Weather (Tornado, Thunderstorm, Snowstorm):** Seek shelter in an interior, windowless room, or a designated storm-safe area. Avoid exterior walls and glass windows.
- **Earthquake:** Drop, Cover, and Hold under sturdy furniture. Once the shaking stops, evacuate if necessary.

Fire Safety and Emergency

Fire safety is a critical aspect of workplace health and safety, and all employees must be prepared to respond effectively in the event of a fire. Preventative measures, awareness, and preparedness help minimize risks and ensure a safe evacuation if necessary.

- **Keeping Emergency Exits Clear** – All emergency exits, hallways, and stairwells must always remain unobstructed. Employees should never place furniture, equipment, or other objects that could block exit routes or delay evacuation. Clear signage must be maintained to direct individuals to the nearest exit.
- **Fire Drills and Evacuation Awareness** – Employees must participate in scheduled fire drills to familiarize themselves with evacuation routes, assembly points, and emergency procedures. Knowing the quickest and safest way to exit the building can save lives in a fire emergency.
- **Fire Extinguishers and Alarm Systems Maintenance** – Fire extinguishers must be accessible and inspected regularly to ensure functionality. Employees should be trained on adequately using fire extinguishers, though personal safety should always take priority over fire suppression efforts.
- **Fire Hazard Prevention** – Employees should take precautions to prevent potential fire hazards, such as:
 - Avoid overloading electrical outlets and use surge protectors.
 - Properly storing flammable materials away from heat sources.
 - Turning off or unplugging electrical devices when not in use.
 - Reporting any electrical malfunctions or fire risks immediately to management.
- **Emergency Response** – In case of a fire, employees must remain calm and evacuate promptly using the nearest designated fire exits. If smoke is present, employees should stay low to the ground and follow evacuation procedures. Once outside, all employees should proceed to the designated assembly point and await further instructions from emergency personnel.

General Shelter-in-Place Procedures

For events such as severe storms, earthquakes, or hazardous material spills, employees should:

- Move to the designated **shelter-in-place area** (e.g., interior rooms, basements, or hallways away from windows).
- Close all doors and remain inside until further instructions are given.

Power Outage Procedures

- Maintain calm and await instructions from management or building maintenance.
- Use flashlights instead of candles for visibility.
- If safe, continue working; otherwise, follow instructions regarding evacuation or shelter-in-place.

Workplace Violence / Active Shooter Response (Run, Hide, Fight)

- **Run:** If possible, evacuate the building immediately.
- **Hide:** If escape isn't possible, hide in a secure, lockable room and remain silent.
- **Fight:** As a last resort, defend yourself using available objects.
- Call **911** when it is safe to do so

18. Fire Protection Plan

PURPOSE

DEHNCO'S Fire Prevention/Protection Policy has been developed to ensure compliance with all related regulations and standard safe work practices. The policy's purpose is to prevent fires and provide guidelines for action if a fire does occur.

Fire prevention program combines the following policies:

- PPE Policy
- Electrical Safety Policy
- Emergency Action Plan

These policies encompass methods used for incidence avoidance, incident response and specialized training required in the event of a fire.

Issues addressed in the above policies include, but are not limited to:

- Evacuation Procedure
- Extinguisher Training
- Basic Process Safety Training (if applicable)
- Hot Work Safety Training (if applicable)
- Confined Space Entry Safety Training (if applicable)
- Emergency Life Support Training
- Respiratory Protective Devices Training (if applicable)
- Assured Grounding Programs

POLICY

Workers shall be informed of the proper actions to take in the event of a fire. This includes, but is not limited to, notification and evacuation procedures. It is STRESSED that at no time does the task of fighting fire supersede an employee's primary duties of:

- Ensuring their own personal safety and the safety of others
- Reporting the incident to the proper authority and ensuring personnel accountability for yourself and all subordinates at the jobsite, in accordance with company and client policy

PROCEDURES

- All workers are responsible for good housekeeping practices to enhance fire prevention methods.
- Supervisors will be held accountable for the housekeeping of their job sites.
- If applicable, welding machine mufflers will be equipped with an approved spark-arresting muffler.
- Only approved containers will be used during fueling operations. These shall be of the self-closing type.
- Combustible and flammable liquids shall be handled and stored in approved containers, cabinets, and areas that are designed for fire prevention. All combustible and flammable materials will be handled and stored in compliance with applicable regulations and client requirements. The quantity of flammable/combustible material shall be kept to a minimum on the job site.
- Welding, cutting, and grinding sparks shall be contained.
- Hot work areas shall be kept wetted down, and a fire extinguisher and hose maintained on each job site
- Oily rags shall be immediately disposed of in designated hazardous waste containers
- No hot work is to be performed without a Hot Work Permit
- All vehicle entry into process areas requires a permit or permission from the operator
- Use bonding straps to discharge and prevent static charges during the transfer of flammable liquids from one container to another
- Report all spills or suspicious odors immediately
- Fire extinguishers are to be kept in areas easily accessible to workers. Only approved fire extinguishers are to be used. They must have an inspection tag attached and be maintained in a fully charged, ready-to-operate state. Portable fire extinguishers must be inspected monthly and annually, and documentation must be provided supporting the inspection and maintenance schedule. Training is

provided to all workers who use or may use fire extinguishers. Fire extinguisher training will include general principles of fire and extinguisher use and the hazards involved with incipient stage firefighting.

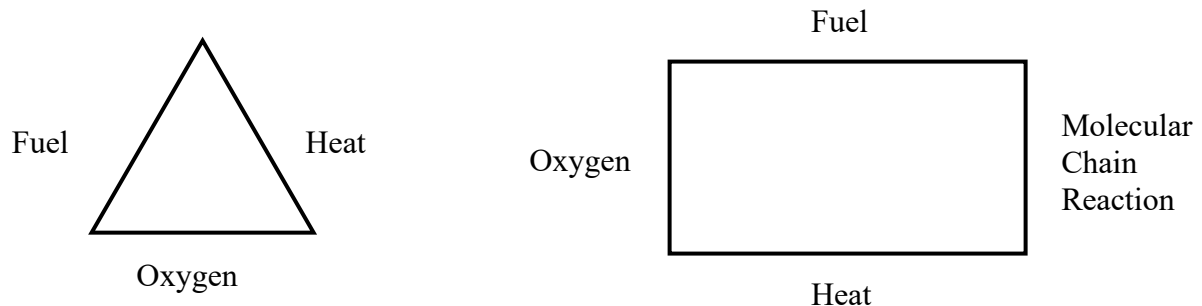
- **NEVER** put yourself or others at risk while attempting to extinguish an incipient fire
- **DO NOT USE** any fire hoses larger than 1-3/4", unless fully trained as an industrial firefighter
- **NEVER** attempt to extinguish a pressurized fuel fed fire
- **DO NOT** direct a fire nozzle with a straight stream at any type of LPG fire. This action could extinguish the fire, producing an LPG vapor cloud capable of detonation
- **DO NOT USE** fire monitors as the force can damage small equipment and certain high chrome alloy equipment cannot have water applied as cracking could occur
- **DO NOT APPLY** water to any acid or caustic release as it can cause a violent reaction. Additionally, low concentration acids or caustics become extremely corrosive, causing an increasing leak condition.

In the Event of a Fire

- Remain calm
- Only extinguish a fire when it is clearly within your abilities and the equipment available
- Know the location of the nearest alarm and how to activate the emergency system
- Know the evacuation routes and collection points
- If the fire cannot be extinguished, leave the area immediately and report to your evacuation area
- Await further instructions from the Incident Commander, or designated responsible personnel

Basic Fire Science

The combination of fuel, heat, oxygen equals the well-known fire triangle. To understand fire better, a fourth factor is added, a molecular chain reaction. This is because fire results from a series of reactions in which complicated molecules "crack" into easily oxidized fragments. Disruption of this chain, along with the removal of fuel, heat, or oxygen, is recognized as a method of fire extinguishment through the use of dry chemical extinguishers.



- **Heat Energy** - Can be produced by building up molecules (composition) or breaking apart (decomposition) by heat or a solution when materials are dissolved in a liquid, or by combustion.
- **Heat Transfer** - A law of physics states that heat tends to flow up from a hot substance or place to a cold substance or place. This is through conduction (transfer of heat through a medium such as metals) or through convection (transfer of heat with a medium-usually circulatory).
- **Fuels** - Those substances that will burn when heat is applied. The most common fuels are not pure elements such as carbon, but compounds and mixtures such as paper and wood.
- **Oxygen** - Makes up a major portion of the oceans and earth's crust and one-fifth of our atmosphere. Atmospheric oxygen is the major source of oxygen that supports combustion. Oxygen itself does not burn, however, without it, combustion is impossible. Normal burning is the combination of fuels with oxygen under the influence of heat.
- **Combustion** - A rapid oxidation or chemical combination accompanied by heat.

- **Oxidation** - The ability of materials to produce oxygen during a chemical reaction.
- **Spontaneous Combustion** - When oxidation is allowed to occur, enough oxygen is available, heat is produced, molecules become more energetic and combine with oxygen at an increasing rate, temperatures rise, and visible heat (flames) are produced.

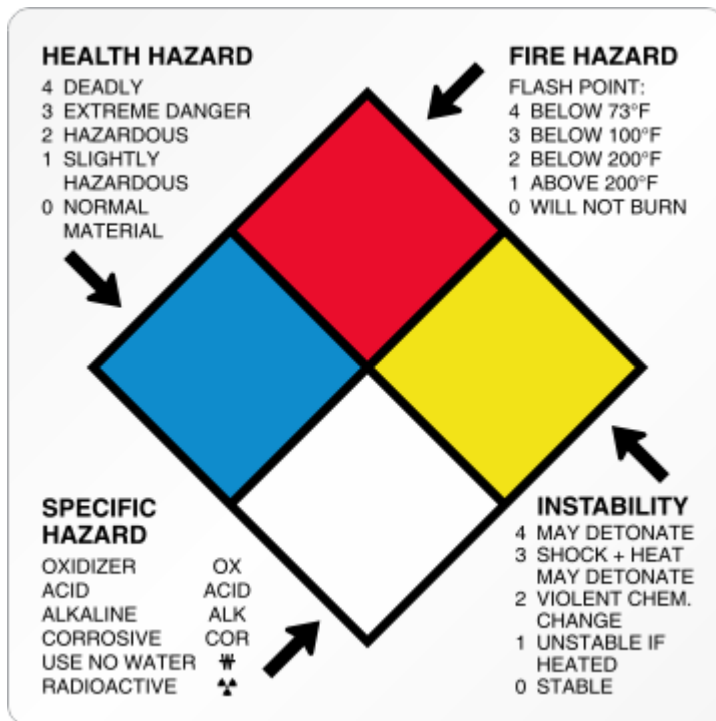
Classes of Fires

- Class A - Ordinary combustibles (wood/paper/textiles)
- Class B - Flammable liquids (gasoline/oils/grease)
- Class C - Live electric (wiring/generators/motors)
- Class D - Combustible metals (finely divided form/chips, turnings)
- Class K – Kitchen (oils/grease)

Types of Fire Extinguishers

- **Water** - extinguisher for ordinary combustible fires
- **Dry Chemical or CO₂** - extinguisher for electrical equipment fires and for flammable liquid fires
- **Multipurpose Dry Chemical** - extinguisher for ordinary combustible fires, liquid fires, and electrical equipment fires
- **Foam** - extinguishing agent for hydrocarbon fires

NFPA Diamond:



19. Severe Weather Emergency Procedures

- **Tornadoes**

In a tornado, employees should immediately move to a designated safe area, such as an interior room, basement, or hallway, away from windows and exterior walls. Employees must remain in the shelter area until an official all-clear is given. After the storm, caution should be taken when exiting the building due to potential structural damage, debris, or downed power lines.

- **Thunderstorms (Lightning & High Winds)**

During severe thunderstorms, employees should remain indoors and away from windows to prevent injuries from flying debris. Electrical devices, including computers, should be unplugged if time allows to prevent power surges. Employees should also avoid using corded phones or metal equipment, as these can conduct electricity in case of lightning strikes. Employees should remain in secure interior areas in high-wind conditions until the storm passes.

- **Snow & Ice Storms**

In anticipation of severe winter weather, the office will monitor conditions and provide advance notifications regarding closures or delayed openings. Employees should exercise caution when commuting, use winter tires when necessary, and allow extra travel time. On office premises, walkways and parking lots will be de-iced regularly, but employees should wear appropriate footwear and use designated paths to prevent slips and falls.

- **Flooding**

If there is a risk of flooding, employees will either evacuate or shelter in place, depending on the severity. Those on lower floors should move to higher levels to avoid rising water. Electrical safety is crucial; employees must avoid standing water near outlets and electrical equipment to prevent electrocution hazards. Once the flood subsides, management will assess structural damage before allowing employees to re-enter the office.

20. Medical Emergencies- First Aid Program

PURPOSE

DEHNCO is committed to workers' safety and health and ensuring prompt medical attention for injuries that occur at work are managed appropriately.

SCOPE

This program applies to all workers, visitors, and contractors under company responsibility.

RESPONSIBILITIES

Employer Responsibilities

Ensure every worker receives training that explains first aid procedures.

Determine who must be trained to render first aid with the appropriate practices and techniques, including response to site-specific hazards.

Ensure the first aid response plan, amount of first aid trained personnel, equipment and all other hazard controls reflect workplace hazards as determined in job hazard analyses and worksite inspections.

Ensure first aid kits remain fully stocked and any emergency response equipment is in good condition.

Worker Responsibilities

Follow the first aid program.

If trained in first aid, render care as needed.

PROCEDURES

First Aid Training

First aid and medical facilities will be made available on site. In the absence of medical facilities there shall be a sufficient number (but not less than one) of workers on each shift certified in first aid and CPR to provide adequate first response medical care.

Each designated first aider will receive training and will have a valid certificate in first aid training from an authorized organization.

First Aid Kits

DEHNCO provides a First Aid Kit on the premises. It is there for worker's use in the treatment of minor scratches, burns, headaches, nausea, etc. All workers shall know the location of the First Aid Kit and shall notify their supervisor if they need to use the First Aid Kit. If a worker has a work-related injury or illnesses that requires professional medical assistance, they shall notify their supervisor as soon as possible.

The supervisor or safety manager shall inspect First Aid Kits before the kits are sent out to each job and on a weekly basis to ensure each kit has the required number of supplies.

Medical Treatment

Non-Emergency Medical Treatment

For non-emergency work-related injuries requiring professional medical assistance, management must first authorize treatment. If a worker sustains an injury requiring treatment other than first aid, they shall:

- Inform their supervisor
- Provide details for the completion of the accident investigation report
- Workers shall use the nearest wash facility or eyewash station in the event a worker accidentally spills or splashes injurious chemicals or liquids on their clothing or body

Emergency Medical Treatment

If a worker sustains a severe injury requiring emergency treatment:

- Injured workers should call for help and seek assistance from a co-worker or supervisor immediately.
- A trained first aid provider will render emergency first aid and request assistance for transportation to the local hospital emergency room or other resources as needed.
- Prior to the start of a job, DEHNCO will ensure that arrangements are in place to transport injured workers from the jobsite to the nearest health care facility.
- The phone number of the ambulance service is to be conspicuously posted and provided to all employees for

response to an emergency condition.

- If an ambulance is not available, DEHNCO will ensure other transportation is available to accommodate the injured. This transportation will:
 - Be suitable, considering the distance to be travelled and the types of acute illnesses or injuries that may occur at the work site
 - Protect occupants from the weather
 - Have systems that allow the occupants to communicate with the health care facility to which the injured or ill worker is being taken
 - Be able to accommodate a stretcher and an accompanying person if required
- Provide details for the completion of the accident investigation report.

21. Bloodborne Pathogens Plan

PURPOSE

DEHNCO is committed to maintaining a safe and healthy work environment. While the risk of bloodborne pathogen exposure is low in an office setting, certain tasks, such as administering first aid, may pose potential risks. This policy ensures that employees follow safe practices to prevent exposure to infectious materials.

SCOPE

This policy applies to employees who may **reasonably anticipate exposure** to blood or other potentially infectious materials during workplace activities, such as designated first-aid responders.

Exposure Control Procedures

- **Universal Precautions:** Treat all bodily fluids as potentially infectious.
- **Hand Hygiene:** Wash hands immediately after potential exposure. If handwashing is not feasible, use antiseptic hand sanitizers.
- **PPE Use:** Gloves, masks, and protective eyewear must be worn when handling blood or other potentially infectious materials.
- **First Aid Precautions:** Employees trained in first aid should use provided bloodborne pathogen kits when assisting an injured person. Used kits must be replaced immediately.
- **Proper Disposal:** Contaminated materials must be placed in designated biohazard disposal bags.

Training and Compliance

Employees designated as first-aid responders will receive bloodborne pathogen training.

Training includes proper PPE use, safe handling of potentially infectious materials, and incident reporting procedures.

Any exposure incidents must be reported immediately for proper evaluation and follow-up.

By following this policy, DEHNCO ensures a safe and compliant work environment while minimizing risks associated with bloodborne pathogens.

Attachment 1

Vaccination Declination Form

Date:

Worker Name:

I understand that due to my occupational exposure to blood or other potential infectious materials I may be at risk of acquiring Hepatitis B virus (HBV) infection. I have been given the opportunity to be vaccinated with Hepatitis B vaccine, at no charge to myself. However, I decline the Hepatitis B vaccination at this time. I understand that by declining this vaccine, I continue to be at risk of acquiring Hepatitis B, a serious disease. If, in the future, I continue to have occupational exposure to blood or other potentially infectious materials and I want to be vaccinated with Hepatitis B vaccine, I can receive the vaccination series at no charge to me.

Worker Signature:

Date:

Facility Representative Signature:

Date:

22. Heat and Cold Stress Policy and Procedures

PURPOSE

DEHNCO has developed this policy to address the hazards of heat and cold-related illnesses.

PREVENTING HEAT-RELATED ILLNESSES (HEAT STRESS)

Heat Stress

Heat stress takes place when your body's cooling system is overwhelmed. It can happen when heat combines with other factors, such as:

- hard physical work
- fatigue (not enough sleep)
- dehydration (loss of fluids)
- certain medical conditions

Heat stress can lead to illness or even death. DEHNCO has a duty to take every precaution reasonable in the circumstances to protect its workers.

Heat Stress Symptoms

Heat rash: itchy red skin.

Heat cramps: painful muscle cramps.

Heat exhaustion: high body temperature; weakness or feeling faint; headache, confusion or irrational behavior; nausea or vomiting.

Heat stroke: no sweating (hot, dry skin), high body temperature, confusion, or convulsions. Get immediate medical help.

Precautions When Working in Hot, Humid Conditions

- Increase the frequency and length of rest breaks.
- Provide **cool drinking water** near workers and remind them to drink often.
- Caution workers about working in direct sunlight.
- Train workers to recognize the signs and symptoms of heat stress. Start a "buddy system" because it's unlikely people will notice their own symptoms.
- Tell workers to wear light summer clothing to allow air to move freely and sweat to evaporate. They should always wear shirts to protect themselves from direct sunlight.

PREVENTING COLD-RELATED ILLNESSES (COLD STRESS)

Cold Stress

When you're cold, blood vessels in your skin, arms, and legs constrict, decreasing the blood flow to your extremities. This helps your critical organs stay warm, but your extremities are at risk for frostbite.

Frostbite means that your flesh freezes. Blood vessels are damaged, and the reduced blood flow can lead to gangrene. The first sign of frostbite is skin that looks waxy and feels numb. Once tissues become hard, it's a severe medical emergency.

Wind chill accelerates heat loss—sometimes to a dramatic extent. For example, when the air temperature is -30°C

- with no wind, there is little danger of skin freezing
- with 16 km/h wind (a flag will be fully extended), your skin can freeze in about a minute
- with 32 km/h wind (capable of blowing snow), your skin can freeze in 30 seconds

When your core temperature drops, you're at risk for hypothermia. Early signs of hypothermia are shivering, blue lips and fingers, and poor coordination. Breathing and heart rate will slow down, and you become disoriented and confused. Hypothermia requires medical help.

Precautions to Prevent Cold Stress

- Train workers to recognize the signs and symptoms of cold stress. Start a “buddy system” because it’s unlikely people will notice their own symptoms.
- Wear several layers of clothing rather than one thick layer.
- Wear gloves if the temperature is below 16°C for sedentary work, below 4°C for light work, and below –7°C for moderate work.
- Take warm, high-calorie drinks and food.
- If your clothing gets wet at 2°C or less, change into dry clothes immediately to prevent hypothermia.
- If you feel hot, open your jacket but keep your hat and gloves on.
- Give workers warm-up and rest breaks in a heated shelter. Ensure work is not conducted only within allowable exposure limits, as per provincial OHS Regulations.

23. Illumination

PURPOSE

To ensure DEHNCO compliance with regulatory and industry best practices in regard to lighting requirements and ensure employees are provided adequate lighting.

SCOPE

This Program applies to all company work areas.

DEFINITIONS

Foot- candle (FC)– amount of illumination produced by a candle from distance of one foot.

Lux Level – measures light level intensity. One lux is the amount of illumination supplied by one candle on a one-meter surface from a distance of one meter.

LIGHTING REQUIREMENTS

The minimum illumination standards are as follows:

- First-aid stations: 30 FC
- Warehouses, walkways, and exits: 10 FC
- Waste areas, loading platforms, refueling areas, and active storage areas: 3 FC

The typical lux levels required in commercial installations are as follows:

- Offices, laboratories, and show rooms: 500 lux
- Factories and workshops: 750 lux
- Warehouse loading bays: 300–400 lux
- Lobbies, corridors, and stairwells: 200 lux
- Warehouse aisles: 100–200 lux

Installation Requirements

All lighting must:

- Be at least 7 feet above work surfaces or have a shatterproof shield

- Not have any exposed energized parts
- Not have an opening large enough that finger can fit through
- Be firmly mounted to a wall, ceiling, or structural member

Temporary Lighting

As part of the hazard assessment process for night work, DEHNCO will consider the hazards of insufficient lighting and ensure all work areas meet the above requirements.

24. Drug and Alcohol Policy

POLICY

DEHNCO is committed to maintaining a safe work environment for all workers and those in the public who may be affected, while ensuring that all workers are treated fairly and with respect. Everyone who works for and with DEHNCO is expected to understand the risks of alcohol and drug use to workplace safety, and to be able to identify and respond to those risks in compliance with this policy. Workers are expected to comply directly with this policy and any supporting programs. Contractors who conduct work on behalf of DEHNCO are expected to develop and enforce comparable policies and programs to manage alcohol and drug risks among their workers.

Work Rules

All workers will be informed regarding this policy at the time of employment. Additionally, it will be discussed periodically at "tailgate" safety meetings.

A worker who has a substance problem is encouraged to seek immediate assistance. DEHNCO Human Resources Department will provide the worker with the name and address of local agencies or facilities that are equipped to provide the rehabilitation assistance needed by the worker.

The following actions are strictly prohibited:

- While on company property or at a company worksite, to use, consume, possess, distribute, sell or transfer:
 - Alcohol (unless contained in sealed (unopened) packaging, and secured in vehicle for transfer to home or official company-sanctioned event)
 - Drugs other than those permitted by this policy as described below
 - Drug paraphernalia
- From reporting to work or performing work while the worker's ability to safely perform their duties is adversely affected by use of drugs or alcohol.
- From refusing to:
 - Comply with a request to confirm they are following this policy when a supervisor or manager has reasonable grounds to believe the worker may not be complying
 - Comply with a request to submit to an alcohol or drug test
 - When a supervisor or manager has reasonable grounds to believe the worker may not be following the policy and the worker cannot confirm compliance without a test
 - Following an incident or near miss if a supervisor or manager present at the workplace has reasonable grounds to believe that the worker was involved in the incident or near miss and there is no objective evidence to believe that the use of alcohol or drugs did not contribute to the cause of the incident or near miss
 - When applying for or transferring into a safety-sensitive position
 - As periodically required by DEHNCO throughout the time the worker is working in a safety-sensitive position
 - When the worker has previously tested positive and is returning to work after an assessment by a substance abuse expert
- This Work Rule permits the possession or use of prescription and non-prescription drugs under the following conditions:

- Any prescription drug in the worker's possession or used by the worker is prescribed to the worker, and
- The worker is using the prescription or non-prescription drug for its intended purpose and in the manner directed by the worker's physician or pharmacist or the manufacturer of the drug, and
- The use of the prescription or non-prescription drug does not adversely affect the worker's ability to safely perform his or her duties, and
- The worker has notified his or her supervisor or manager before starting work of any potentially unsafe side effects associated with the use of the prescription or non-prescription drug.

No information collected about a worker under this policy will be disclosed to any person unless the worker has given consent or the supervisor or manager in possession of the information is legally required to disclose it.

Testing Procedures

Laboratory Testing

DEHNCO will designate the laboratories to perform substance testing on blood or urine specimens in accordance with standards set forth by an established industry standard. The substances and detection levels covered by this testing program are set forth below. Workers may be asked by collection site personnel to indicate whether there is the potential that they will test positive for prescription or other substances. A consent form and information sheet will be provided. If the worker fails to provide an acceptable urine specimen DEHNCO may take the following steps:

- Extend the stay of the worker at the designated collection site, if feasible, until an acceptable specimen can be collected
- Reschedule the test due to unusual circumstances, (i.e., post-operative situations)
- Discipline the worker, up to and including termination, on the first offense for failing to cooperate or refusing to provide an acceptable specimen

All positive urine specimen test results for workers on active status will be confirmed by standard laboratory procedures. In case of testing by means other than urine (i.e., breath or other samples), reliable laboratory or instrument testing procedures will be followed.

Testing Substances

As a minimum, the following substances and detection levels shall be tested for:

- Alcohol level equal to or in excess of 0.04 BAL
- Equal to or in excess of the urine concentrations set out in the below table:

Drugs or Classes of Drugs	Screening concentration equal to or in excess of ng/ml
Marijuana metabolites	50
Cocaine metabolites	300
Opiates	2000
6-Acetylmorphine	10
Phencyclidine	25
Amphetamines/Methamphetamines	1000
MDMA	500

Concentrations at or in excess of the above levels shall be conclusive proof of unacceptable levels of unauthorized, prohibited, illegal or controlled substances.

Disciplinary Action for Policy Violation

Applicants

If the final result of a pre-employment drug screen is positive, the applicant will not be employed. No applicant can be reconsidered for employment sooner than six (6) months following the date of the positive drug screen.

Workers

No drug test will be conducted without written consent. However, any worker who refuses to provide such written consent and fully cooperates with this policy will be subject to disciplinary action, including discharge from employment.

- Under certain circumstances, disciplinary action may include a mandatory referral to and enrollment in an approved rehabilitation program at the worker's expense. This action may also require an indefinite suspension of regular employment.
- A worker's job is not in jeopardy by reason of his voluntary admission to having a substance problem and requests for help and referral to an approved rehabilitation program, provided that such request is made before, and well in advance of, any consideration of being tested under the provisions of this policy. Workers participating in this rehabilitation program will be subject to follow-up or "maintenance" testing.

Contractors, Subcontractors, Vendors, Their Workers' Agents, or Representatives

- No drug test will be conducted without written consent. However, anyone who refuses to provide such written consent and does not fully cooperate with this policy will be subject to disciplinary action up to and including removal from the job or job site, as may be appropriate. Preliminary findings of a policy violation may require that the individual involved be suspended from the job pending the results of DEHNCO investigation.
- If the final result of a "reasonable cause" or "post-accident" drug screen is positive, the individual will be permanently barred from the job.

Client Requirements

In the event that a client has an Alcohol and Drug Testing Guideline that is more stringent than those outlined above, the client's guidelines will be followed for all work done with that client. Examples of more stringent guidelines include but are not limited to:

- A greater number of substances (panels) to be tested for
- A lower detection/cut off levels
- Specified number or percent of workers to be tested on the site
- DOT or similar mandated programs

25. Subcontractor Safety Management

PURPOSE

To establish a process for selecting and managing subcontractors who perform work in DEHNCO office environments, ensuring their safety practices align with the company's commitment to workplace health and safety.

POLICY

All subcontractors working in DEHNCO office spaces must adhere to safety standards that meet or exceed company policies and industry regulations. Subcontractors will be evaluated for their safety record, compliance with regulations, and ability to maintain a safe working environment while performing tasks on-site.

SCOPE

This policy applies to all subcontractors performing work at DEHNCO office locations, including maintenance, facility services, IT infrastructure setup, and any other contracted work.

PROCEDURES

Subcontractor Selection

- Subcontractors must complete a safety pre-qualification questionnaire to assess their safety record and compliance history.
- Safety performance, training programs, and incident history will be reviewed annually.

Safety Compliance Requirements

- Subcontractors must follow all DEHNCO office safety policies, including PPE use where applicable and adherence to emergency procedures.
- Worksite inspections may be conducted to ensure compliance with safety expectations.

Incident Reporting

- Any workplace injuries, near-misses, or unsafe conditions must be reported immediately to DEHNCO's safety coordinator.
- Subcontractors with a history of repeated OSHA citations or violations may be subject to additional reviews before being approved for work.

26. Document Reviews and updates

DEHNCO will review and revise this policy annually to ensure its effectiveness and relevance.