ANDREWS INTERNATIONAL

SAFETY PROGRAM

AND

GUIDELINES

August 22, 2009
I acknowledge I have received a copy of **ANDREWS INTERNATIONAL, SAFETY MANUAL** and have read, understand and agree to abide by the policy. I have been given an opportunity to ask questions and express any concerns about this policy. I realize failure to comply with these practices may be grounds for dismissal.

Print Name ____________________ Date ____________________

Signature ____________________
ANDREWS INTERNATIONAL
SAFETY PROGRAM and Guidelines
Component Programs

I  EMERGENCY RESPONSE GUIDELINES       Page 4
II INJURY & ILLNESS PREVENTION PROGRAM   Page 13
III CODE OF SAFE PRACTICES                Page 38
IV BLOOD BORNE PATHOGENS PROGRAM         Page 59
V  ALCOHOL, DRUG & CONTRABAND POLICY     Page 63
VI HOTEL LODGING PROGRAM                 Page 72
VII HYDROGEN SULFIDE PROGRAM             Page 77
VIII HAZARDOUS WASTE OPERATIONS AND EMERGENCY
    RESPONSE PROGRAM (HAZWOPER)           Page 82
IX  HAZARD COMMUNICATION                 Page 89
X  POST INJURY MANAGEMENT PROCEDURES FOR
    SUPERVISORS                           Page 95
XI SHORT SERVICE EMPLOYEE (SSE)          Page 99
XII JOB SAFETY ANALYSIS PROGRAM (JSA)    Page 101
XIII PERSONAL PROTECTIVE EQUIPMENT (PPE) Page 104
XIV NEAR MISS PROGRAM                    Page 107
XV PANDEMIC PLAN                        Page 108
### ANDREWS INTERNATIONAL

### EMERGENCY RESPONSE GUIDELINES

#### TABLE OF CONTENTS

<table>
<thead>
<tr>
<th>SECTION NO.</th>
<th>DESCRIPTION</th>
<th>PAGE</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.0</td>
<td>INTRODUCTION</td>
<td>6</td>
</tr>
<tr>
<td>2.0</td>
<td>KEY ELEMENTS OF RESPONSE PLANS</td>
<td>6</td>
</tr>
<tr>
<td>3.0</td>
<td>EARTHQUAKE PREPAREDNESS</td>
<td>7</td>
</tr>
<tr>
<td>4.0</td>
<td>FIRE EMERGENCY</td>
<td>8</td>
</tr>
<tr>
<td>5.0</td>
<td>BOMB THREAT</td>
<td>9</td>
</tr>
<tr>
<td>6.0</td>
<td>VIOLENCE IN THE WORKPLACE</td>
<td>10</td>
</tr>
<tr>
<td>7.0</td>
<td>POWER FAILURE</td>
<td>11</td>
</tr>
<tr>
<td>8.0</td>
<td>FLOODING</td>
<td>11</td>
</tr>
<tr>
<td>9.0</td>
<td>DOCUMENTATION</td>
<td>11</td>
</tr>
<tr>
<td></td>
<td>EMERGENCY CARE AND DISASTER ACTION PLAN FORM</td>
<td>12</td>
</tr>
</tbody>
</table>
EMERGENCY RESPONSE GUIDELINES

1.0 INTRODUCTION

The key personnel assigned to execute this emergency plan are responsible for coordinating and ensuring the prompt investigations, evaluation, and if necessary, evacuation of the building which would include all persons within the structure.

The Safety Manager will schedule training and coordinate emergency response activities with the Safety Committee. The Safety Committee will appoint Key Personnel for specific activities during an emergency. The committee will recommend training and practice drills as needed. The Safety Committee will monitor drills and prepare a report for the Safety Manager, making recommendations for improving response performance where needed.

2.0 KEY ELEMENTS OF RESPONSE PLANS

(a) Designate Command Center Chain of Command. Train Command Center personnel.

(b) Determine method for announcing emergency evacuation order.

(c) Train all employees in response tactics.

(d) Schedule drills, monitor and evaluate response.

(e) Revise plan to increase emergency response performance as needed.

(f) Advise employees of every change in the plan.

(g) Provide best escape routes and alternates; designate safe meeting or refuge area.

(h) Method for accounting for personnel at the meeting site to identify missing persons.

(i) Report missing persons to Command Center for search and rescue activities.

(j) Maintain order; keep everyone together until released by emergency response team.

(k) Train a First Aid/CPR team.

(l) Provide supplies for Command Center.
3.0 EARTHQUAKE PREPAREDNESS

During the Earthquake:

(a) Take cover under a study piece of furniture if possible. If not, seek cover against an interior wall. Look up and make sure there is no possibility of falling objects. Protect your head with your arms. Avoid danger spots near windows, hanging or stacked objects, mirrors, filing cabinets and bookcases and/or bookshelves.

(b) If under a sturdy piece of furniture, hold on to it and be prepared to move with it. Continue to hold until the ground has stopped shaking and it is safe to move.

(c) STAY CALM!

After the Earthquake:

(a) If necessary and/or practical, begin evacuation procedures.

(b) Check for injured persons and if possible, assist to safety.

(c) If remaining inside, stay away from windows and areas where objects may be hanging or unstable and likely to fall.

(d) Check for gas, water, sewage breaks and most important...downed electrical lines and shorts. Turn off appropriate utilities and check for building damage, if safety permits.

(e) Clean up spills to keep from slipping.

(f) Turn on radio and listen for announcements and instructions.

(g) Do NOT use the telephone unless it is an emergency.

(h) Use a flashlight if electricity if off...don’t light matches or candles until the atmosphere is clear and it is safe to do so.

(i) Do NOT use elevators...Do NOT move anyone who is seriously injured unless ABSOLUTELY necessary...Look for people who may be trapped.

(j) Stay Calm...take time to think all activities through. Be prepared for aftershocks.

(k) If outside, stay outside. Move to an open area, preferably to a pre-designated safe meeting area, away from buildings, trees, glass and power poles and lines. Take cover in a doorway away from overhangs if on the sidewalk near buildings.
If in a car, pull over and stop. Do NOT stop on or under bridges, underpasses or power lines. Stay inside the car.

**Emergency Supplies**

(a) Flashlights and store of extra batteries and bulbs.
(b) Battery-powered radio with store of extra batteries.
(c) Canned and/or dehydrated food -enough to last each person at least 3 days.
(d) Water in study, airtight plastic or stainless steel containers; 3 gallons per employee times 3 days.
(e) Blankets.
(f) Tools, accessories like wrenches, hammers, pliers, screwdriver, plastic sheeting, hatchet, rope, wire, tape, broom and shovels.
(g) Other necessities include matches in tight sealed, water proof container, fire extinguisher, work gloves, pail with cover, bathroom tissue, plastic bags, manual can opener, coffee pots and miscellaneous pans, etc.
(h) Stock a First-Aid Kit:

### 4.0 FIRE EMERGENCY

**IF YOU SPOT A FIRE:**

- Turn in the alarm.
- Turn off equipment as safety permits.
- Use fire extinguishers if practical and as safety permits.
- If safety permits close windows and doors (do NOT lock) as you leave the fire area.
- Get to safety, telling others about the fire as you go.
- Evacuate to the designated meeting place for a head count.

**KNOW HOW TO GET OUT AND WHERE TO GO** – it is every worker’s responsibility to know, in advance, the escape routes and safe meeting place. Ask a supervisor if in doubt, before a fire occurs, and memorize the route(s).

**KNOW THE LOCATION OF FIRE EXTINGUISHERS AND OTHER FIRE EQUIPMENT** – employees are expected to locate the extinguishers or other fire station equipment nearest to their workstation. They will be trained to use the equipment.

**ALWAYS REMEMBER** –

- Do NOT blow burning papers out of wastebasket fires.
- Never put water on an electrical fire or piece of electrical equipment.
• Do NOT attempt to fight a fire, which is too big for the extinguisher.
• When responding to a fire, select the nearest extinguisher and take it to the fire. Never fight a fire alone, there should always be a minimum of two persons both with extinguisher.

STOP, DROP AND ROLL! - If clothing catches fire...STOP, DROP to the floor or ground and ROLL to smother the flames. Protect face with hands and roll over and over to smother the flames. If someone else’s clothing is on fire, wrap them in a rug or blanket to smother the flames.

SMOKE IS DANGEROUS – Evaluate the escape route. If there is a lot of smoke, use an alternate route. If exit is only possible through the smoke, the cleanest air will be 12 to 24 inches above the floor. Crawl to the nearest safe exit.

WHEN SOMEONE IS BURNED – immediately place wound in cool water for 10 to 15 minutes. If the burn blisters or chars, seek medical attention immediately. Do NOT try to remove any fabric that gets stuck to a burn. Cover it with a loose clean (preferably sterile) cloth or pad and get immediate medical help.

FIRE DEPARTMENT WATCH – Designate someone to assure driveways are cleared of traffic for the arrival of the Fire Department; have them stay to direct the Fire Department personnel to the fire area.

5.0 BOMB THREAT

THREAT BY PHONE -
• Record the time the call is received
• Stay calm and in control. Take notes of the conversation if possible.
• Pay attention to the exact words of the message, with particular emphasis upon the description and location of the bomb. If the caller does not indicate the location of the bomb or the time it is set to go off, ask for that information.
• Try to determine the age, race, and sex of the caller. Listen for any peculiarities such as tone of voice, speech impediments, accents, etc.
• Listen for background noises, such a running motors, traffic, airplanes, autos, music, voices, bells or whistles. This information could help determine where the call is being made from.
• Try to get as much information from the caller as possible.
• Ask them to repeat the message. Ask them the reason for placing the bomb and making the threat.
• Notify management and emergency response services as quickly as possible.
THREAT BY MAIL –

- Contact the nearest FBI office immediately for advice and guidance.
- Do NOT destroy either the letter or the envelope in which the threat is mailed. Try to avoid handling and putting your fingerprints on the items received.

IN GENERAL –

- If the bomb threat refers to a specific area, move away and clear all personnel from that area until authorities check it.
- In the event a suspected object is discovered it must not be disturbed in any way prior to the arrival of the authorities. Follow directions of first responders, i.e. Police or Fire Services.

6.0 VIOLENCE IN THE WORKPLACE

If an employee is threatening other employees, or just issuing general warnings like “if things do not change around here soon I am going to change them with my shotgun” the worst thing is to ignore it. Interview the employee and try to find out what the problem is. In all instances report the incident to Andrews International management and to client, no matter how minor it may appear.

AN EMPLOYEE WHO THREATENS OR INTIMIDATES CO-WORKERS SHOULD BE DEALT WITH DIRECTLY AND QUICKLY –

- Take threats seriously!
- Extreme changes in work performance and behavior can signal emotional turmoil.
- Watch out for anyone who is quick to feel slighted and perceive maltreatment even when there is none.
- If a person who was fired is seen hanging around the office, notify management.

WHAT TO DO –

- In many potentially violent situations, the potential victims are so afraid of appearing rude or of embarrassing themselves by being wrong; they cease to trust their own instincts. Trust your instincts and choose whatever option is open to you.
- Be assertive – verbal response to a threatening situation should contradict, disagree.
• Be in control – keep voice under control at a medium volume, facial expression calm, controlled.
• If you feel threatened or scared, or think you are in danger, do NOT ignore it. Retreat if necessary, seek assistance if necessary, but report all incidents.

7.0 POWER FAILURE
(a) Notify management if they are not in the same area.
(b) Know where emergency lighting/flashlights are located.
(c) Turn off all electrical equipment as possible.
(d) Know where the backup telephone is and report to the

8.0 FLOODING
Flooding may be caused by either natural/environmental conditions or man-made conditions (i.e., a water main break in an urban area). In either case, it is important (if time and safety permits) to:
• Shut off main circuit breaker
• Disconnect all machinery, electrical appliances, or equipment that cannot be moved.

   Do not touch anything if you are wet!

9.0 DOCUMENTATION
An Emergency Care and Disaster Action Plan (attachment) must be completed for each location. Telephone numbers and job assignments must be kept up to date and be applicable for each location. One of these plans will be completed for each job site prior to the commencement of work activities at that site. Employees will be advised of the action plan.

The Response Administrator will be the manager responsible for each company location. At each job site, the manager responsible for supervising work activities will be the Response Administrator for that project.

All incidents must be investigated and documented.
EMERGENCY CARE AND DISASTER ACTION PLAN

Name of Facility

Owner/Operator

Address

Telephone Number

AFFIRMATION STATEMENT
As the Response Administrator for this location I assume responsibility for this plan for providing emergency services as indicated below. I will instruct all the employees and contractors under my supervision in their duties and responsibilities under this plan.

__________________________________________
Signature

__________________________________________
Date

ASSIGNMENTS DURING AN EMERGENCY (USE REVERSE SIDE IF ADDITIONAL SPACE IS NEEDED)

ASSIGNMENT    RESPONSIBLE PERSON    TITLE
EVACUATION & HEAD COUNT
FIRST AID/CPR
TELEPHONE/COMMUNICATION
TRANSPORTATION, IF NEEDED
DIRECTING EMERGENCY VEHICLES
MEDIA MANAGEMENT
HAZARD ASSESSMENT & CONTROL

EMERGENCY TELEPHONE NUMBERS

FIRE DEPARTMENT/PARAMEDICS:

POLICE AND/OR SHERIFF:

POISON CONTROL CENTER:

AMBULANCE:

NEAREST EMERGENCY HOSPITAL (PHONE AND ADDRESS):

RED CROSS:

OSHA:

COMPANY MANAGERS (NAME AND NUMBERS):

OTHERS:

PROVIDE FLOOR PLAN WITH LOCATIONS OF EMERGENCY EQUIPMENT, UTILITY SHUT OFF VALVES, HOSPITAL, EMERGENCY EXITS AND SAFE MEETING PLACE FOR HEAD COUNT.
NEW EMPLOYEE SAFETY ORIENTATION

Company’s Safety Statement - ANDREWS INTERNATIONAL accepts the fundamental responsibility to provide a safe and healthy work place for all employees. We believe all accidents are preventable. Safety must always come first, regardless of other priorities.

Each new employee is to review a copy of the INJURY AND ILLNESS PREVENTION PROGRAM AND THE CODE OF SAFE PRACTICES POLICIES. The location of these in each facility is to be known and accessible by all employees. Each new employee is to be given a copy of the CODE OF SAFE PRACTICES.

1. Employee’s Responsibilities:
   a. Working safely and following the applicable safety rules is a condition of employment.
   b. Each employee is required to know and understand the safety rules that apply to the work they are performing.
   c. If a condition or work practice is observed that is not safe, defective, or which may be destructive to employees or company property, it is the duty of the employee to correct the condition and/or report it to their supervisor. We encourage safety improvement suggestions.

   GENERAL SAFETY RULES

1. All accidents/injuries must be reported to your supervisor as they happen. The supervisor will then complete the Preliminary First Report of Injury and send it immediately to DAN HOFFMAN, THE SAFETY PROGRAM COORDINATOR. Under no circumstances are you to leave the premises before reporting the injury. Failure to follow this rule could cancel your Worker’s Compensation, medical coverage, and/or result in disciplinary action.

2. ANDREWS INTERNATIONAL will provide you with the applicable personal protective safety equipment for the job you are assigned. This equipment must be used while doing the assigned task. Failure to do so could result in disciplinary action being taken against you. I.E. Safety glasses, latex gloves, etc.

3. Proper lifting techniques must always be used.
   a. Always lift with your legs.
   b. Do not twist. Always reposition your feet rather than twist.
   c. Get assistance with loads that may obstruct your view, or too heavy for you to lift alone, and under no circumstances lift anything over fifty pounds (50) without assistance.

4. Do not use any equipment you have not been trained to use. You must be familiar with the hazards, what safety equipment is required, and the safe operating instructions of each piece of equipment before you can use it. Ask
your supervisor if you want or need to be trained on a piece of equipment. Train all new employees to each facility on the location and use of: fire extinguishers, emergency evacuation routes, first aid kit to include the blood borne pathogens protection kit, the eyewash station, the location of emergency phone numbers, and location of power cut off circuit breakers.

5. **Housekeeping** – Keep your equipment and work area clean and in good repair. Maintaining a safe and clean work environment is everyone’s responsibility. Pick up or clean up immediately:
   a. Any dropped or spilled items, which could cause slips, trips, or falls.
   b. Store supplies and equipment so they do not block walkways or exit doors, cause congestion, or block access to fire extinguishers or other fire fighting equipment.

6. **Do not use** any equipment that is damaged, has a missing guard, or has an unprotected power cord or is missing a ground connection.

7. Power shall be turned off, and equipment unplugged, when performing maintenance or adjusting a piece of equipment.

8. When using any equipment and/or tools follow all company safety policies as well as all manufacturers’ suggested operating procedures.

9. If driving on company business all rules and laws of the road, including wearing your seat belt must be followed.

10. ANDREWS INTERNATIONAL is a drug free work place. The use of any substance, which impairs your ability to perform your job, is unacceptable and is grounds for termination. Report to your supervisor any prescription medication you are taking affecting alertness. **ALL NEW EMPLOYEES WILL RECEIVE A COPY OF THE DRUG AND ALCOHOL POLICY.**

   I have read these rules, or had them explained to me. I accept them as a condition of my employment and will obey them for my own benefit. I understand that this list is preliminary and my responsibility to work safely extends beyond these rules.

   Signature of Employee __________________________ Date __________________________

   Supervisor/Trainer __________________________ Date 11/01
## INJURY AND ILLNESS PREVENTION PROGRAM

### TABLE OF CONTENTS

<table>
<thead>
<tr>
<th>Page#</th>
<th>Topic</th>
</tr>
</thead>
<tbody>
<tr>
<td>17</td>
<td>Introduction</td>
</tr>
<tr>
<td>17</td>
<td>Safety Policy Statement</td>
</tr>
<tr>
<td>18</td>
<td>Safety Program Objectives</td>
</tr>
<tr>
<td>19</td>
<td>Assignment of Responsibility</td>
</tr>
<tr>
<td>22</td>
<td>Enforcement of Safe Work Practices</td>
</tr>
<tr>
<td>22</td>
<td>Safety Committee</td>
</tr>
<tr>
<td>25</td>
<td>Hazard Assessment and Control</td>
</tr>
<tr>
<td>28</td>
<td>Hazard Report Form</td>
</tr>
<tr>
<td>29</td>
<td>Facility Inspections</td>
</tr>
<tr>
<td>31</td>
<td>Employee Education and Training</td>
</tr>
<tr>
<td>33</td>
<td>Safety Hotline</td>
</tr>
<tr>
<td>33</td>
<td>Accident Investigations</td>
</tr>
<tr>
<td>36-37</td>
<td>Accident Investigation Form</td>
</tr>
</tbody>
</table>
INTRODUCTION

In the United States, every employer is required by law to provide each and every employee with a safe and healthful work place. In addition, every employer is required by The General Industry Safety Order, to develop, implement, and maintain a written Injury and Illness Prevention Program (IIPP), which must include seven basic elements:

(1) Identification of a person responsible for implementing the program.

(2) A system for ensuring that employees comply with safe and healthy work practices. Compliance includes recognition for employees who follow safe work practices, training, retraining, and disciplinary actions.

(3) A system for communicating health and safety matters to employees in language that they understand. Compliance includes meetings, training programs, posting written communications and a system for anonymous notification by employees about hazards.

(4) Procedures for identifying and evaluating workplace hazards, including scheduled periodic inspections to identify unsafe conditions.

(5) A procedure to investigate injuries and illnesses.

(6) Procedures and/or methods for correcting unsafe or unhealthy conditions.

(7) Training and instruction for employees.

This manual is meant to improve workplace operations, better control hazards, reduce accidents and losses, and comply with California occupational safety and health regulations.

STATEMENT OF SAFETY POLICY

It is the policy of ANDREWS INTERNATIONAL to strive for the highest safety standards. Safety does not occur by chance. It is the result of careful attention to all operations by those who are directly and indirectly involved. Employees at all levels must work diligently to execute the Company's policy of maintaining a safe and healthful work environment. Accidents can be controlled and it is the intention of management to take every reasonable action to produce positive results.

In recognition of the responsibility of management personnel to establish a policy with regard to the prevention of accidents, this Injury and Illness Prevention Program has been developed; the purpose of which is to:

1. Reduce human suffering and employee inconvenience resulting from accidents.
2. Develop lower insurance costs.

3. Reduce indirect costs resulting from accidents.

This safety program has been developed to assure compliance with Federal, state, and local regulations with particular emphasis on Cal-OSHA requirements that apply to our operations. The management of ANDREWS INTERNATIONAL requires you to comply with all safety laws and ordinances. Safety of our employees, the public, and our operations is paramount. Safety will take precedence over expediency or shortcuts in the operation of our Company. Prevention of injury and illness is a goal well worth achieving.

A safe operation is organized, clean, and efficient. If every employee views accidents, in the same way we consider all other aspects of our operations, we will be in a better position to control and improve the total performance of our organization. It is, therefore, of utmost importance that all aspects of our safety program must be strictly adhered to and that the intent of this program is followed to the letter. NO JOB IS SO IMPORTANT AND NO SERVICE IS SO URGENT THAT WE CANNOT TAKE TIME TO PERFORM OUR WORK SAFELY.

Any recommendations to improve our safety program are encouraged.

SAFETY PROGRAM OBJECTIVES

It is the objective of ANDREWS INTERNATIONAL safety program to create a safe and healthful work environment for our employees and guests, and for the general public by:

(1) Implementing a full written program complying with Cal-OSHA and OSHA standards.

(2) Establishing a Safety Committee with the objective of setting rules and safe working procedures.

(3) Conducting a hazard analysis and control program to improve safe working habits of our employees.

(4) Investigating all accidents to determine preventability.

(5) Educating of personnel and posting of all necessary data to comply with federal, state, and local laws.

(6) Conducting a safety-training program for all employees on an ongoing basis.

(7) Establishment of emergency procedures:
(a) First aid  
(b) Emergency medical  
(c) Fire, egress  
(d) Natural disasters

It is the objective of ANDREWS INTERNATIONAL safety program to protect employees, guests, and public by establishing guidelines for coping with unforeseen emergencies.

(1) Establish emergency preparedness programs for:

(a) Earthquake  
(b) Fire  
(c) Bomb threats  
(d) Hostage situations

(2) Establish ongoing training of these procedures.

(3) Conduct drills on a regular basis with local authorities.

ASSIGNMENT OF RESPONSIBILITY

It shall be the responsibility of the Vice President, Human Resources – DAN HOFFMAN – (Safety Program Coordinator), to coordinate the implementation of ANDREWS INTERNATIONAL Injury and Illness Prevention Program.

It shall be the responsibility of the SAFETY PROGRAM COORDINATOR to:

• Coordinate all loss control activities.

• Establish minimum safe standards, rules, and regulations.

• Review all supervisor accident investigation reports determine preventability and follow-up, on Corrective action.

• Report to upper management concerning safety concerns.

• Act as a chairperson of the Safety Committee.

• Provide a budget to support loss control efforts.

It shall be the responsibility of the SAFETY MANAGER – ANDREW H HEIDER to support the company and safety policy by:

• Delegating and assigning safety responsibilities to all levels of personnel.
• Consistently monitoring safety program developments, progress, and effectiveness.

• Reviewing all supervisor accident investigation reports determine preventability and follow-up, regarding corrective action.

• Establish training programs for employees and supervisors as required.
• Assesses OSHA citations for overall company impact.
• Acting as liaison with governmental, consulting, auditing, inspecting, and workers compensation agencies at the corporate level.
• Assuring all records is maintained at all locations in compliance with the regulations.
• Coordinating loss control activities.
• Assigning special projects for safety committees as needed and monitors progress and results.
• Designing and monitors safety and health education programs for employees, supervisors and management personnel.
• Performing regular inspections of work sites.
• Assuring all safety and health activities are properly documented and maintained in file.

It shall be the responsibility of all MANAGERS / SUPERVISORS to:

• Advise the Safety Manager concerning additional safety training or equipment needed for subordinates.
• Perform regular inspections of work sites.
• Become fully knowledgeable of hazards and injury potentials in their departments.
• Communicate and enforce all company policies and procedures relating to job safety, including safety rules and regulations.
• Respond to employee suggestions concerning safety matters.
• Become knowledgeable of safety codes and regulations.
• Conduct timely and effective identification surveys and accident investigations (Submit all related documentation to the Safety Coordinator).
- Conduct employee safety training and orientation (Submit documentation of this training to the Safety Coordinator).
- Ensure each subordinate is able to and understands how to complete each assigned task safely.
- Conduct or arranging for on the job safety training of personnel they supervise.
- Advise the Safety Manager concerning additional safety training or equipment needed for subordinates.
- Conduct pre-job safety evaluations to determine what safety and health procedures will apply, what equipment will be needed, what level of protection to use, and what training or pre-job instructions need to be provided to employees for the work to be performed.
- Correct unsafe and unhealthful conditions within their power.
- Report to the Safety Manager any unsafe or unhealthful condition beyond their power to correct.
- Provide temporary controls to minimize the potential risks associated with any unsafe or unhealthful condition until a permanent solution is provided.
- Stop work when an unsafe or unhealthful condition cannot be immediately corrected, or temporary controls cannot be applied.
- Encourage input from subordinates concerning safety and health on the job.
- Clearly defining safety expectations to all subordinates.
- Issue discipline for safety violations fairly and consistently.
- Investigate accidents to discover cause(s), as well as identifying action needed to prevent future occurrences.

- It shall be the responsibility of all EMPLOYEES to:
  - Become fully knowledgeable of hazards and injury potentials presented by their job tasks.
  - Adhere to all company policies relating to job safety including both general safe work rules and task specific rules and regulations.
  - Use appropriate safety equipment and personal protective equipment as required.
  - Maintain equipment in good condition.
  - Report all injuries, no matter how minor, immediately to your supervisor.
  - Encourage co-workers to work safely.
• Report all unsafe acts and conditions to supervisory personnel immediately.

ENFORCEMENT OF SAFE WORK PRACTICES

DISCIPLINARY ACTION PROGRAM

It is essential that all employees comply fully with ANDREWS INTERNATIONAL health and safety policies and procedures. Where appropriate, performance evaluations may take into consideration an employee’s compliance with health and safety requirements. Employees who are particularly effective in following safe and healthful work practices may receive recognition for their effectiveness.

Due to the importance of health and safety considerations to the Company, Employees who violate health and safety policies or procedures, or who cause hazardous situations, may be subject to disciplinary action, up to and including termination.

SAFETY COMMITTEE

A safety Committee is one of the best ways to assist management with a safety program. Effective safety committees may vary in size and functions, but all have one thing in common; they must have strong support from upper management. Management’s guidance and participation is necessary in order to enlist and maintain employee interest in the safety program.

Before the Safety Committee and its functions can be defined, it must be thoroughly understood that supervisors must be primarily responsible for the control of accidents in their departments. Supervisors are the key to any good safety program. They must be educated to accept this responsibility, for it cannot be passed along to any other individual or to any committee.

The chairperson (Safety Program Coordinator) DAN HOFFMAN will designate committee members. Committee membership will include representatives of management. The Safety Committee will assist the Safety Program Coordinator in carrying out a planned safety program. The committee should confine all activities to the safety of employees, company vehicles and property, and public liability exposures.

The basic functions of this safety committee will be to:

(1) Create and maintain an active interest in safety.

(2) Serve as a means of safety and health communications.

(3) May make inspections and recommend methods for elimination of hazards.
(4) Provide information towards improvement of the safety program.

(5) Review accident trends, analyze records and reports, and take appropriate action where trend indicates need.

(6) Check on safety activities to ensure that they are being carried out effectively.

(7) Assist all supervisors in their efforts to implement accident prevention.

(8) Review recommendations submitted by supervisors and take appropriate action.

(9) Investigate accident reports as a basis for recommending means to prevent recurrence.

(10) Review recommendations resulting from departmental inspections and establish a procedure for handling suggestions.

(11) Develop and review safety rules.

This committee shall meet quarterly or as needed. Each meeting will be documented.

The following is presented as a suggested order of business that may be adopted for Safety Committee meetings:

(1) **Call to Order** – the meeting should be called to order promptly at the appointed time.

(2) **Roll Call** – names of members and others present and absent should be recorded.

(3) **Minutes of Previous Meeting** – should be read and corrections made.

(4) **Unfinished Business** – all matters on which definite decisions have not been made should be brought up for reconsideration.

(5) **Review of Accidents and Statistics** – any accidents, which occurred since the prior meeting should be reviewed, and preventive measures discussed.

(6) **Safety Education** – When desirable, the chairperson should request a member to speak at the next meeting. The subject to be discussed should be reviewed with management and approved.
(7) Inspections and Recommendations – review departmental inspection reports and include in the minutes.

(8) New Business – safety suggestions and potential hazards and recommendations should be discussed.

(9) Adjournment

Minutes should be taken, prepared, and circulated after approval by the chairperson. The minutes are of great importance since they are so often sent to others besides committee members, especially upper management. The minutes must record accurately all decisions made and actions taken, since they serve as a means of keeping management informed of the group’s work and as a follow-up tool.
SAFETY COMMITTEE MEMBERSHIP

Dan Hoffman
Don Anderson
Susan Arman
Andy Heider
Mike Lippiatt

HAZARD ASSESSMENT AND CONTROL

Periodic inspections and procedures for correction and control provide a method of identifying existing or potential hazards in the workplace, and eliminating or controlling such condition. Hazard control is the heart of an effective injury and illness prevention program.

Should hazards occur or recur, this may reflect a weakness in the hazard control system. The hazard control system is also the basis for developing safe work procedures and injury/illness prevention training.

A qualified individual must make the required hazard assessment survey of the workplace. This survey can provide the basis and guide for the establishing a hazard assessment and control system. The survey produces knowledge of hazards that exists in the workplace, and conditions, equipment and procedures, which could be potentially hazardous.

An effective hazard control system will identify: hazards that exist or develop in the workplace, how to correct those hazards, and steps to take to prevent their recurrence. If an effective system for monitoring workplace conditions exists:

1. You will be able to prevent many hazards from occurring through scheduled and documented self-inspections.

Make sure established safe practices are being followed and that unsafe conditions or procedures are identified and corrected properly. Scheduled inspections are in addition to the everyday safety and health checks that are part of the routine duties of managers and supervisors.

The frequency of these inspections on the operations involved the magnitude of the hazards, the proficiency of employees, changes in equipment or work processes, and the history of workplace injuries and illnesses. Personnel who, through experience or training, are able to identify actual and potential hazards and understand safe work practices should conduct inspections.

Management and/or the Safety Committee must review written reports. The review should assist in prioritizing actions and verify completion of
previous corrective actions. Overall inspection program results should be reviewed for trends.

Know which CAL-OSHA safety orders contained in Title 8 of the *California Code of Regulations* apply to your workplace and use them to identify potential hazards.

**IDENTIFYING HAZARDS FOR A TYPICAL COMMERCIAL WORKPLACE**

First  The Safety Manager will conduct a comprehensive survey of the customer’s operation to determine what types of work are being done, whether one or more job safety classes will be necessary based on the customer’s duties, and make any preliminary hazard notes, if apparent.

Second  The Safety manager in conjunction with the Safety Coordinator will review applicable OSHA standards for observable hazards or violations.

Third  Conduct a detailed job-by-job review of workstations and occupations of the employees, using representative employees assigned to job safety classes to make this task easier. Look for safety hazards tentatively identified in the second step. Consult with employees. The following rules should apply: “If it looks unsafe, it probably is,” “If the employees indicate that it is unsafe, it probably is.” Pay special attention to potential chemical exposures during this review.

Fourth  Develop the codes of safe practices for each job safety class for the general work area.

**UNSCHEDULED INSPECTIONS**

The Safety Manager or an appointed representative will conduct a department inspection whenever any of the following occur:

- A new substance, process, procedure or equipment is introduced to the workplace;
- An accident or near miss is reported;
- Following an earthquake, when damage may have occurred;
- Following construction work;
The Supervisor or Safety Manager becomes aware of a new or previously unrecognized hazard, either independently or by receipt of information from an employee.

CONTROL OF HAZARDS

It is the company’s intention to eliminate or minimize all hazards and unsafe work practices immediately. Some permanent corrective actions require more time. In these cases, immediate temporary precautions to minimize risk must be taken by the supervisor, or the job must be shut down pending correction. Priority will be given to life-threatening or severe hazards.

(2) Employees should be encouraged to tell their supervisors of possible hazardous situations, knowing their reports will be given serious attention without fear of reprisal.

When employees are notified that the situation was corrected (or why it wasn’t hazardous), a system is created by which employees continue to report promptly and effectively.
HAZARD REPORT FORM

Date: ______________

DESCRIPTION OF HAZARD: ____________________________________________

________________________________________

LOCATION:

____________________________________________

ACTION NEEDED (Please note any immediate action already taken to minimize risks):

____________________________________________

OTHER COMMENTS:

____________________________________________

CORRECTIVE ACTION TO BE TAKEN (Describe who and what will be done to correct the situation):

____________________________________________

DATE CORRECTED: _______________ SIGNED: ________________________

COMMENTS:

____________________________________________
FACILITY INSPECTIONS

Finding unsafe conditions and work practices by means of inspection and promptly correcting them is one of the best methods for management to prevent accidents and safeguard employees. Management also demonstrates to employees its interest and sincerity in accident prevention.

Inspection procedures have two basic objectives:

1. Maintaining a safe work environment and controlling the unsafe actions of people and;
2. Maintaining operational profitability

Inspections should not be limited to a search for unsafe conditions, but also try to detect unsafe practices.

Inspectors should know how to locate hazards and have the authority to act and make recommendations.

Recommendations should be prioritized, assigned to a responsible individual, and given a time limit for completion.

All formal inspections must be documented.

All inspections are to be conducted by supervisory personnel for their delegated areas and employees.

INSPECTION PROCEDURES

No matter how safe a work environment is from the standpoint of design and engineering, there are always forces at work that will create unsafe conditions. Hence, the need for formal inspection procedures. The line supervisors rather than full-time inspection specialists or safety personnel must carry out the bulk of all safety inspection work, as the supervisor is closest to the operations.

UNSAFE CONDITIONS MUST BE DETECTED PROMPTLY

Incident Inspections

1. Supervisors will continuously engage in a visual inspection procedure. Items to be noted are unsafe employee acts, machine operations, maintenance processes, manual materials handling, and other applicable conditions that affect the employee safety and health.

2. Unsafe acts and conditions shall be addressed immediately via correction or implementation of the Disciplinary Action Program.
3. The person or persons initiating it shall follow up all corrective actions.

**Planned Inspections**

1. Planned inspections will be conducted at least annually for all work areas.

2. All planned inspections will be documented. Corrective action taken will be documented.

3. Unsafe conditions will be corrected as soon as possible with any that present an immediate threat to employees corrected immediately or the equipment/area restricted.

4. The safety Program Coordinator will complete an Annual Safety Audit including a thorough walkthrough inspection of all areas, as well as a thorough review of training, documentation, health and safety records, accidents and injuries.

**EMPLOYEE EDUCATION AND TRAINING**

Poor attitudes and unsafe actions often are the cause of accidents in the business and industry. Training is one way to change the way employees think and act. Training of employees should start the first day on the job. It should continue thereafter.

Supervisors shall receive training because it will allow them to effectively complete their responsibilities in this regard.

Basic training consideration will include the following:

1. Emphasize management’s intent and attitude towards safety.

2. Acquaint new employees with all company safety policies, rules and procedures. Periodically review safety policies, rules and procedures with all employees.

3. Provide new employees with written job information (job descriptions; job safety analysis; etc.) to reinforce actual on-the-job training activities.

4. Provide periodic instruction on the use, care, and maintenance of any required personal protective equipments.

5. Periodically advise all employees of potential exposure to any major hazards (e.g., chemicals, hazardous equipment, etc.); ensure that they fully understand the degree of hazard and the necessary precautions.

6. Acquaint the new employee with company disciplinary policies for violation of safety rules and regulations.
7. Provisions for medical services and first aid including blood borne pathogen and emergency procedures.

8. Proper reporting of hazards and accidents to supervisors.

9. The supervisor or the Safety Program Coordinator must document all safety training and orientation.

TRAINING TOPICS

The level of training provided depends upon the nature of the work an employee will be expected to do. All ANDREWS INTERNATIONAL employees will be instructed in the following:

- Injury and Illness Prevention Program
- Hazard Communication Plan
- General Safety Rules/Code of Safe Practices
- Housekeeping Standards
- Emergency Action Plan
- Blood borne Pathogens
- Drug and Alcohol Policy
- Hydrogen Sulfide H2s
- Applicable Job Safety Analysis
- Hotel Lodging
- HAZWOPER
- Short Service Employee
- Personal Protective Equipment

Additional training topics will be provided as job activities dictate and may include:

- Electrical Lockout/Tag out
- Back Safety/Safe Lifting Practices
- Ladder Safety
- First Aid/CPR
- Equipment Safety
- Office and Office Equipment Safety
- Material Handling
- Proper Use of Box Cutters
- Near Miss Observations
- Driver’s Safety
- First Responder
- Emergency Equipment
- Emergency Alarm Systems
- Pedestrian Traffic/Travel
- Barricade, Roped or Taped Off Areas
- Stairs
SAFETY HOTLINE

The Injury and Illness Prevention Program requires a mechanism to encourage employees to inform the employer of hazards at the worksite without fear reprisal.

ANDREWS INTERNATIONAL has set up the 'Safety Hotline', whereas employees may phone in safety concerns anonymously. Calls are followed up immediately and a call log maintained. The ‘Safety Hotline’ telephone number is (800) 452-1622.

ACCIDENT INVESTIGATIONS

The objective of an accident investigation is to find the cause(s) of an accident. This will allow corrective action to be devised and implemented and minimize a recurrent accident problem.

Accident investigations should involve fact-finding, not fault finding. Once the cause of an accident is determined, the corrective actions needed to prevent recurrence are usually quite obvious.

Accident investigation procedures are:

1. Accident investigations will be conducted for all accidents, which require an employee to seek a physician’s care or cause property damage. An accident investigation will also be required for all first aid cases that might have resulted in more serious consequences.

2. The supervisor in charge of the injured employee will make the investigation, or that supervisor having jurisdiction over the equipment and/or property subjected to damage.

3. The investigation shall be made within 24 hours of an accident.

4. The supervisor conducting the accident investigation will record the results of the investigation on the Supervisor’s Accident Investigation Report.

5. The complete investigation form will be submitted to the Safety Program Coordinator.

6. The investigation report shall indicate the specific cause(s) of the accident. Specific actions or conditions that led to the accident must be included. Statements such as “the cause of the accident was carelessness” are not useful or acceptable.

7. The First Report of Injury will be complete and forwarded to the Human Resources Department after receipt of all needed accident information from the Supervisor and/or the Safety Program Coordinator.
GUIDELINES FOR ACCIDENT INVESTIGATION

The occurrence of an occupational injury and/or illness requires completion of The Supervisor’s Accident Investigation form. The injured employee’s supervisor completes this report. The supervisor will visit the accident scene as soon as possible while the facts are fresh and before witnesses forget important details. Prompt investigation is essential since conditions at the incident scene may change.

If possible, interview the injured worker at the scene of the accident and conduct a “walk-through” re-enactment of the incident.

Include these points in the accident report:

1. Accident description. Focus on causes and hazards. Develop an analysis of what happened and how it happened. Determine what caused the accident itself, not just the injury.

2. Identify causes – unsafe procedures, unsafe acts, unsafe conditions or unsafe processes.

3. Provide a good diagram of the accident site. Document details graphically. Use sketches and photos as needed. Take photos from all angles, as well as close-ups. Take measurements when appropriate.

4. All interviews should be conducted as privately as possible. Interview witnesses one at a time. Talk with anyone who has knowledge of the accident, even if they did not actually witness it. Consider taking signed statements in cases where facts are unclear or there is an element of controversy.

5. Non-employee victims or witnesses. Get the names, addresses and phone numbers, and in auto accidents, the driver’s or drivers’ license number(s), license plate number(s), and vehicle description(s).

6. Every investigation should include an action plan. How will such accidents be prevented in the future? Make recommendations to eliminate the cause(s).

7. If a third party or defective product contributed to the accident, save any evidence. It could be critical to the recovery of claims costs.
8. Carry out corrective measures immediately when practical, and note this activity on the report.

A copy of this report is to be given to the Safety Manager within 24 hours of the occurrence. Upon receipt the Safety Manager will:

1. Report fatalities and serious injuries or illness immediately by phone or FAX to the nearest office of the Division of Occupational Safety and Health (8 CCR, Section 342).

2. Ensure record able injuries or occupational illnesses are entered on the OSHA 300 log within 24 hours of the injury/illness by the IIPP Coordinator.

   Every employer is required to report immediately (within 8-hours) by telephone or fax to the nearest District Office of the Division of Occupational Safety and Health, any serious injury or illness, or death, of an employee occurring in a place of employment or in connection with any employment [8 CCR, Section 342].
ACCIDENT INVESTIGATION REPORT

(Turn in to Safety Program Coordinator and Human Resources Department)

<table>
<thead>
<tr>
<th>NAME OF INJURED:</th>
</tr>
</thead>
<tbody>
<tr>
<td>INJURY DATE:</td>
</tr>
<tr>
<td>AGE: MALE ☐ FEMALE</td>
</tr>
<tr>
<td>JOB TITLE</td>
</tr>
<tr>
<td>NATURE OF INJURY AND/OR PROPERTY DAMAGE:</td>
</tr>
</tbody>
</table>

WITNESS, IF ANY:

WHERE ACCIDENT OCCURRED (LOCATION):

HOW ACCIDENT OCCURRED:

DESCRIBE UNSAFE ACTS:

DESCRIBE UNSAFE CONDITIONS:

CORRECTIVE ACTION TAKEN TO PREVENT RECURRENCE:

SUPERVISOR SIGNATURE: _______________________________ DATE: ________________
### Facts of Accident/Illness

<table>
<thead>
<tr>
<th>Illness</th>
<th>Injury</th>
<th>Fatality: yes</th>
<th>no</th>
<th>Date:</th>
</tr>
</thead>
</table>

Did incident occur on employer’s premises: ( ) yes ( ) no

If yes, address of plant / establishment: ____________________________________________________

City ____________ State _________ Zip_________

Where on premises did incident occur? _______________________________________________________

If no, address where incident occurred _______________________________________________________

(if injury occurred where number and street are unidentifiable, provide place references)

How many photos enclosed? ___________________ City ____________ State _________ Zip _________

Date of Accident / Illness ____________ Date Reported __________ Time of accident __________ am/pm

What was employee doing when the accident occurred? (Be specific. If employee was using tools or equipment or handling material, name them and tell what employee was doing with them.)

____________________________________________________________________________________________________

________________________________________________________________________________________________________

Explain how the incident occurred. List events that resulted in injury or illness, what happened and name objects and how they were involved (use a separate paper if necessary).

________________________________________________________________________________________________________

________________________________________________________________________________________________________

Describe the specific cause of the injury or illness: _____________________________________________

---

This form complies with OSHA’s Supplementary Record of Occupational Injuries and Illnesses Form 101, and must be completed within six working days of an incident and kept in the establishment for five years to comply with Public Law 91-596 and OSHA requirements.

Note: If fatality occurred or more than 3 employees are hospitalized OSHA must be notified within 8 hours.
ANDREWS INTERNATIONAL

CODE OF SAFE PRACTICES

ACCIDENT PREVENTION

RULES & REGULATIONS

III

August 22, 2009
# Code of Safe Practices

## TABLE OF CONTENTS

<table>
<thead>
<tr>
<th>Section</th>
<th>Page Number</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>INTRODUCTION: 1.0</strong></td>
<td>41</td>
</tr>
<tr>
<td>Purpose</td>
<td>41</td>
</tr>
<tr>
<td>In Case of Accident</td>
<td>41</td>
</tr>
<tr>
<td>Safety Management Statement</td>
<td>41</td>
</tr>
<tr>
<td>Safety Policies and Goals</td>
<td>42</td>
</tr>
<tr>
<td>Key Principles of Safety Management</td>
<td>42</td>
</tr>
<tr>
<td>Employee Responsibility</td>
<td>42</td>
</tr>
<tr>
<td>Interpretation of Rules</td>
<td>43</td>
</tr>
<tr>
<td><strong>GENERAL SAFETY: 2.0</strong></td>
<td>43</td>
</tr>
<tr>
<td>Clothing and Personal Protective Equipment</td>
<td>43</td>
</tr>
<tr>
<td>Conduct on the Job</td>
<td>45</td>
</tr>
<tr>
<td>Fire Protection</td>
<td>45</td>
</tr>
<tr>
<td>Guards and Shields</td>
<td>46</td>
</tr>
<tr>
<td>Hand Tools</td>
<td>46</td>
</tr>
<tr>
<td>Housekeeping</td>
<td>47</td>
</tr>
<tr>
<td>Intoxicants</td>
<td>47</td>
</tr>
<tr>
<td>Ladders</td>
<td>47</td>
</tr>
<tr>
<td>Material Lifting, Carrying, Handling and Storage</td>
<td>48</td>
</tr>
<tr>
<td>Office and Building Safety</td>
<td>48</td>
</tr>
<tr>
<td>Portable Electric Tools</td>
<td>49</td>
</tr>
<tr>
<td>Smoking</td>
<td>50</td>
</tr>
<tr>
<td>Work Area Access</td>
<td>50</td>
</tr>
<tr>
<td>Work Area Protection</td>
<td>50</td>
</tr>
<tr>
<td>Offshore Travel</td>
<td>51</td>
</tr>
<tr>
<td>Near Miss Reporting</td>
<td>51</td>
</tr>
<tr>
<td>Safe Operations Reporting</td>
<td>51</td>
</tr>
<tr>
<td>Emergency Equipment</td>
<td>51</td>
</tr>
<tr>
<td>Emergency Alarm Systems</td>
<td>51</td>
</tr>
<tr>
<td>Pedestrian Traffic/Travel</td>
<td>52</td>
</tr>
<tr>
<td>Barricades, Roped or Taped Off Areas</td>
<td>52</td>
</tr>
<tr>
<td>Stairs</td>
<td>52</td>
</tr>
<tr>
<td><strong>HEALTH AND ENVIRONMENT: 3.0</strong></td>
<td>52</td>
</tr>
<tr>
<td>Chemicals</td>
<td>52</td>
</tr>
<tr>
<td><strong>ELECTRICAL: 4.0</strong></td>
<td>53</td>
</tr>
<tr>
<td>General</td>
<td>53</td>
</tr>
<tr>
<td>Lockout/Tagout</td>
<td>54</td>
</tr>
<tr>
<td>Personal Protective Equipment</td>
<td>54</td>
</tr>
</tbody>
</table>
VEHICLE OPERATIONS: 5.0  54
  General  54
  Vehicle Searches  55
  Special Entry Authorization  55
  Cell Phone Use  55
  Pedestrian Right-Of-Way  56
  Backing Procedures  56
  Material-Hauling  56
  Operation  56

FIRST AID  57
  Treatment Procedures  57
1.0 INTRODUCTION

1.1 PURPOSE

A. The accident prevention rules herein set forth are for the purpose of preventing injury to persons and damage to property. The illumination of all accidents is what our company strives to achieve.

B. ACCEPTANCE OF EMPLOYMENT CONSTITUTES ACCEPTANCE OF THESE ACCIDENT PREVENTION RULES. EACH RULE SHALL BE EFFECTIVE UNDER EVERY CIRCUMSTANCE WHERE IT MAY BE APPLICABLE.

C. The prevention of accidents is essential to the proper performance of each job and NO EMPLOYEE SHALL ASSUME THAT SAFETY IS THE JOB OF SOMEONE ELSE. Within his control, each employee is responsible for his own safety.

1.2 IN CASE OF AN ACCIDENT OR INJURY

A. Every injury that occurs on the job, even a slight cut or strain, must be reported to management and recorded within the shift the incident occurred.

B. Under no circumstances, except emergency trips to the hospital, should an employee leave the work site without reporting an injury to Management.

C. If the injury is non-serious and does not require medical attention, Management shall complete an entry on the Divisional Splinter Report.

D. If the injury requires medical attention, the Manager/Supervisor must notify The Power P.E.O. Inc., so the appropriate notifications can be made to the workers’ compensation insurance carrier.

E. The Supervisor within the same shift period, but no later than 24 hours after the accident, will complete the applicable “Supervisor’s Accident/Incident Investigation Report.” Safety Form 102.

F. In all instances involving a Vehicular Traffic Accident, Management shall immediately go to the scene, and complete Safety Form 102.

1.3 SAFETY MANAGEMENT STATEMENT

Andrews International management accepts the fundamental responsibility to provide a safe and healthy workplace and believes preventing work related injuries, occupational
illnesses, and property damage is good business, and we have established the following safety policies and goals:

1.4 SAFETY POLICIES & GOALS

A. Conduct business in a responsible manner, which promotes the safety, health, and well being of our employees, our contractors and the public.

B. Safety must always come first, regardless of other priorities.

C. Provide a safe and healthy work environment free from recognized hazards.

D. Prevent, to the extent possible, all work related injuries, occupational illnesses, and property damage.

1.5 KEY PRINCIPLES OF SAFETY MANAGEMENT

A. Safety is a management responsibility. Supervision understands and accepts accountability for preventing work-related injuries, occupational illnesses, and property damage.

B. Supervisors are responsible for training employees to work safely and instilling a positive safety attitude.

C. Supervisors are responsible for providing safe work procedures and ensuring employees’ compliance with these procedures, AI Accident Prevention Rules, and all other safety requirements.

D. Working safely is a condition of employment

E. Employees accept the responsibility for working safely and extend concern for personal safety to fellow employees and all others.

F. All facilities, workplaces, processes, and equipment hazards can be reasonably safeguarded.

“The best safety device is a Properly informed well trained Careful employee”

1.6 EMPLOYEE RESPONSIBILITY
A. Each employee shall be required to know and understand the rules that apply to the work he is performing. Employees may be subject at any time to an examination of the rules herein contained that apply to their duties.

B. If a condition or practice is observed that is unsafe, defective or destructive to the employees’ or company property, or hazardous to the public or their property, it is the employee’s duty to correct the condition, if possible, or report it to his supervisor.

C. If an employee is assigned work, which he considers contributive to the destruction of equipment or is hazardous without the proper protection, the employee shall bring the matter to the attention of his supervisor before starting the work.

D. Each employee shall use care in the performance of his duties, assuring at all times maximum protection against accidents involving himself, other employees, the public and/or any company property, or the property of others.

1.7 INTERPRETATION OF RULES

A. These rules shall be interpreted to bring about maximum compliance and safe conduct.

B. If a difference arises in the application or interpretation of these rules, the decision of the employee in charge of the job shall be followed.

2.0 GENERAL SAFETY RULES

*The following rules apply to all employees.*

2.1 CLOTHING, GROOMING AND PERSONAL PROTECTIVE EQUIPMENT

A. Clothing and Grooming: All employees shall dress in a manner appropriate to their occupation and the hazards of their particular jobs. Particular attention should be paid to exposing the skin to environmental hazards such as: heat sources; radiation; chemical contamination; acid; and other substances associated with the work process. General guidelines are:

1. No hats or caps allowed during working hours.
2. No jewelry, for your own security (one ring on hand & watch is OK). Jewelry can snag and injure you.
3. No loose fitting jeans or pants allowed. Appropriately fitting jeans or pants worn around the waist only. Loose clothing can snag or cause you to trip or fall.
4. No tank tops, revealing tops, or crop tops. Polo shirts, t-shirts, and button down shirts only.
5. No sandals opened toed shoes or high heels. Tennis shoes or work boots must be worn.
6. Hair above collar and well-groomed appearance.

B. Eye and Face Protection – (Where needed)

1. Employees and/or visitors shall wear eye protection when in the vicinity of any substances, flying particles or chemicals that may cause injury to that person’s eyes. Employees shall wear goggles or a full-face splash shield when working with chemicals that may be splashed into the eyes.

2. Employees shall be provided with eye and face protection equipment when machines or operations present potential eye or face injury from physical, chemical or radiation agents. If you feel you are exposed to such a hazard inform your supervisor so the work process can be evaluated or PPE equipment provided.

3. Employees, whose vision requires the use of corrective lenses in spectacles, shall be protected by goggles or their own corrective lenses, meeting the requirements of ANSI Z87.1-1989.

4. Face and eye protection equipment shall be kept clean and in good repair. The use of this equipment with structural or optical defects shall be prohibited.

C. Foot Protection – (Where needed)

1. Approved footwear shall be worn by employees where there is a danger of injuries due to falling or rolling objects, or objects piercing the sole, and where such employee’s feet are exposed to electrical hazards.

2. Footwear that is deteriorated to a point where it does not provide the required protection shall not be used, (e.g. open or split seams; broken eye grommets or laces; holes in the sole/heel; rubber boots with holes in the body, etc.).

3. In job processes where there is a hazard of injury to the toes, approved safety-toed footwear shall be worn. Some job processes may require metatarsal foot guards, as well as steel toe protection. Supervisors shall determine the need and type of foot protection to be worn by their employees. All Safety shoes shall be rated to conform to the appropriate ANSI standards, (ANSI Z41, 1991).
D. Hand Protection

1. Employees shall be required to use appropriate hand protection (e.g. gloves) when the employee’s hands are exposed to hazards such as severe cuts or lacerations; splinters; severe abrasions; punctures; chemical burns; thermal burns; or blood borne pathogens.

E. Hair Protection

1. Employees with hair length that could present hazardous conditions when working around reciprocating or revolving equipment or machinery shall contain hair in a net or other suitable means to prevent entanglement.

F. Hearing Protection – (Where needed)

1. Employees shall wear approved hearing protective devices when using equipment that has been identified as generating noise above the safe limit; (having to raise your voice to be heard at a distance of 3 feet, shall require the need to wear appropriate hearing protection).

2.2 CONDUCT ON THE JOB

A. Practical jokes, horseplay, scuffling or any other conduct, which would subject any employee to risk of bodily injury, shall not be tolerated.

B. Only safe, approved work methods and procedures shall be used. Employees shall not take unnecessary risks while performing work activities.

C. Injuries, no matter how minor, shall be reported as soon, as is practical.

2.3 FIRE PROTECTION

A. All employees must conduct their operations in such a way as to minimize the possibility of fire. This means applying rules such as keeping combustibles separated from ignition sources, being careful about smoking, and avoiding needless accumulations of combustible materials.

B. Fire protection equipment shall be properly located at all times. Except for actual use, employees shall not move or remove such equipment from its assigned location, or vehicle. To remove this equipment for any other reason than to fight a fire, subjects the employee to disciplinary actions, including termination.
C. All fire extinguishers shall be mounted in a fixed location. In a building the fire extinguisher must be mounted at least 4 inches off the ground and the top of the fire extinguisher is not more than 5 feet high.

D. Employees shall be familiar with both the location and the operation of all fire protective equipment and systems in the vicinity of their work areas.

E. All employees shall know the classes of fire, their burning characteristics and the proper type of fire extinguisher to be used.

F. Fire extinguishers shall be inspected at least monthly to determine that they are at their assigned locations, that they are not obstructed, and that they are in apparent working condition. The date and initials of this monthly inspection should be noted on the back of the inspection card. Discrepancies shall be reported to the supervisor promptly.

G. Employees shall not enter confined spaces after using a CO₂ extinguisher until the area has been thoroughly ventilated.

H. Employees shall store materials in such a manner as to maintain proper clearance below all fire sprinkler heads (18 inches)

2.4 GUARDS AND SHIELDS

A. Equipment guards and protective devices must be used and shall not be compromised. No employee shall remove, or tamper with, any protective device provided by the manufacturer on any tools or equipment.

B. If any such guards or protective devices are damaged, the tool or equipment must be tagged, taken out of service, be reported to the responsible supervisor, and the guard or protective device replaced before returning the tool or equipment to service.

C. This rule applies to but is not limited to: all manual, gas, or electric powered devices, or applicable hand tools.

2.5 HAND TOOLS

A. All tools regardless of ownership shall be of an approved type and maintained in good condition. Tools are subject to inspection at any time.

B. Defective tools shall be tagged to prevent their use, or they shall be removed from the job site.

C. The handles of tools shall be kept free of splinters and cracks and shall be kept tight in the tool.
D. Employees shall always use the proper tool for the job to be performed. Makeshift and substitute tools shall not be used unless they have been approved and meet all requirements.

2.6 HOUSEKEEPING

Work locations, vehicles and the inside and outside of buildings shall be kept clean and orderly at all times.

2.7 INTOXICANTS

THE USE OF INTOXICATING BEVERAGES, CHEMICALS, DRUGS, INHALANTS, OR CANNABIS PRODUCTS, WHICH HAVE AN IMPAIRING OR INTOXICATING EFFECT ON EMPLOYEES, IS PROHIBITED. Any employee under the influence of intoxicating beverages, chemicals, cannabis, or drugs shall not be allowed on the job. Exception: Drugs under medical prescription, which do not impair the safe performance of job duties.

2.8 LADDERS

A. General Rules

   1. Wooden ladders shall not be painted as it might obscure a defect in the wood.

   2. All ladders shall be inspected prior to use. Ladders with weakened, broken or missing steps, broken side rails, or other defects shall be tagged and removed from service repaired or discarded.

   3. Ladders shall not be placed in front of doors, or gates, which open toward the ladder unless the door is open, locked, guarded, or otherwise barricaded.

   4. When ascending or descending ladders, employees shall have both hands free, shall face the ladder and maintain a three point contact at all times.

   5. Ladders shall not be used as scaffold platforms

   6. Boxes, chairs, etc. shall not be used as ladders.

B. Step Ladders

   1. The top step shall not be used, except for platform ladders.

   2. Stepladder legs shall be fully spread when the ladder is in use.
3. Stepladders shall not be used as straight ladders.

4. When an employee is working on a step ladder over 10 feet high, the ladder shall be held by another person.

2.9 MATERIAL LIFTING, CARRYING, HANDLING AND STORAGE

A. Always use proper lifting procedures as shown below:

B. When physically lifting objects that cannot be safely handled, assistance shall be obtained.

C. There shall be a prearranged signal when two or more persons handle an object that is to be lifted, lowered, moved or dropped.

D. Loads shall be carried in such a manner that vision is not obstructed, and when two or more persons are carrying an object, they shall face in the same direction.

E. All materials stored in tiers shall be stacked, racked, blocked, interlocked or otherwise secured to prevent slipping, falling, or collapsing.

F. When emptying trash, employees are not to push or compress the trash bag with their hands. This is to avoid cuts or puncture wounds from sharp objects such as broken glass.

G. Aisles and passageways shall be kept clear to provide for the free and safe movement of material-handling equipment or employees.

H. Non-compatible materials shall be segregated in storage.

I. Get assistance with loads that may obstruct your view or which are over 50 pounds.

2.10 OFFICE AND BUILDING SAFETY
A. Employees shall walk with care when using stairways and shall use handrails.

B. Employees shall walk on the right-hand side of hallways and stairs. Caution shall be exercised when walking around corners and in hallways.

C. Desk drawers and file cabinets shall be kept closed when not in use.

D. Only one drawer of a file cabinet shall be pulled out at a time.

E. Due caution shall be used when sitting in chairs. Do not tilt back, so as to avoid tipping chairs.

F. Standing on boxes, chairs or makeshift support to reach overhead objects is prohibited.

G. Do not store sharp objects loose inside drawers unless they are protected.

H. Good housekeeping practices shall be observed. Slipping, tripping and falling hazards shall be removed or barricaded.

I. Materials shall be stored securely on shelves; heavier objects shall be placed on lower shelves.

J. Only qualified personnel shall clean, oil or adjust any machine. If the machine is not equipped with a starting switch that can be locked in the "off" position, it shall be disconnected from its power source and reported to maintenance for repair.

K. Unsafe or faulty electrical equipment or cords shall not be used, but removed from service and replaced or repaired.

L. Pointed objects such as knives, scissors, uncapped fountain pens and pencils, shall not be carried in an upright or pointed position through congested areas or blind corners.

M. Do not store paper or flammable products next to any appliances.

2.11 PORTABLE ELECTRIC TOOLS

A. The non-current carrying metal parts of portable electric tools shall be effectively grounded when connected to a power source unless:

1. The tool is an approved double insulated type; or
2. The tool is connected to the power supply by means of an isolated transformer or other insulated power supply such as a 24V DC system.
B. All powered tools shall be examined prior to use to ensure general serviceability and for the presence of all applicable safety devices. The electric cord and electric components shall be given a thorough examination.

C. Powered tools shall be used only within their capability and shall be operated in accordance with the instructions of the manufacturer’s safe operating procedures.

D. All tools shall be kept in good repair by a qualified person and shall be disconnected from the power source while repairs or adjustments are being made.

E. Electrical tools shall not be used where there is a hazard of flammable vapors, gases or explosive dusts.

2.12 SMOKING

A. Smoking is prohibited where restricted by municipal regulation, or banned by the company. Open flames are not permitted where flammable, explosive gasses or highly combustible materials are stored or used. Absence of "No Smoking" signs shall not be construed by the employee to permit smoking.

B. The discarding of matches, cigars, cigarettes, or any other burning substances is prohibited. They shall be extinguished and placed in a proper receptacle or otherwise disposed of safely.

2.13 WORK AREA ACCESS

A. Employees shall observe and use unobstructed walkways to work areas, and they shall not jump over or across obstructions to reach work areas.

B. Employees shall not jump onto or from elevated work areas. This includes exiting from the bed or storage area of a vehicle.

C. When an employee is descending from a work area or vehicle, he shall always use the 3-point rule. There shall always be three points of contact (2 hands 1 foot) when descending from an elevated level.

2.14 WORK AREA PROTECTION

A. Work area protection is adequate safeguarding or protecting of employees, equipment and the public. Proper work area protection shall be planned to ensure the safety and protection of all employees, the public, equipment, and other property.
2.15 OFFSHORE TRAVEL

A. Travel off shore is done by Crew Boat and Helicopter. Personnel traveling offshore are required to have all the needed personal protective equipment with them prior to arrival. This includes a hardhat, safety glasses or safety rated cover glasses, long pants and sturdy or steel-toed shoes/boots.

B. On the initial visit personnel will receive the appropriate safety training and view the required offshore training videos, receive instruction on how to safely use the swing rope and personnel lift along with helicopter safety operations.

2.16 NEAR MISS REPORTING

- Our clients also have Near Miss/Safety Awareness Reports that are provided to identify incidents of potential incidents that could cause personal injury or property damage. Near misses do not have to be a serious brush with death before they are documented. Near misses can be generated on any issue that has the potential of hurting someone. On the back of the Near Miss Report is an explanation of what is considered a near miss.

No names are required on this form. Near misses can be submitted secretly by mailing them to the HMI Corporate office.

2.17 SAFE OBSERVATION REPORTING

- Along with Near Miss/Safety Awareness Reports are Safe Observation Reports which are for the purpose of commending or recognizing personnel for the safe or exemplary manner in which they perform their job duties. Safe Observation reports can be used to commend personnel or used for training purposes to aide other employees in the performance of their duties.

2.18 EMERGENCY EQUIPMENT

- Do not obstruct access to emergency equipment or facility emergency utilities.
- Yield the right-of-way to emergency vehicles, personnel and equipment.
- Use emergency equipment only for its intended purpose and only of you have been properly trained.

2.19 EMERGENCY ALARM SYSTEM

- The Plant wide Emergency alarm system is utilized to inform the refinery of an emergency.
- The fire alarm consists of alarm tone attack.
2.20 PEDESTRIAN TRAFFIC/TRAVEL

- Walk to the left, facing traffic on roadways or use walkways when applicable.
- Pedestrians have the right-of-way, except for emergency vehicles, personnel, and equipment.
- Do not run while on refinery property including parking areas.
- Do not walk or drive through the process block to short cut your original destination.

2.21 BARRICADES, ROPE OR TAPED OFF AREAS

- Do not enter roped off or barricade areas unless authorized.

2.22 STAIRS

- Keep three points of contact when ascending or descending stairways or steps.
- Take one step at a time and stay to the right.

SECTION 3 - HEALTH AND ENVIRONMENT

3.1 CHEMICALS

A. General Safety

1. Copies of manufacturer Material Safety Data Sheets (MSDS) shall be obtained for each chemical used by the Company. All chemical information sheets shall be made available to employees upon request.

2. Employees shall be informed of the hazardous chemicals in their work area and how to protect themselves from potential hazards posed by these products.

3. Employees shall report any abnormal sensations or discomforts that may be caused by chemicals in the workplace environment.

4. Chemical wastes, which are hazardous, shall be placed in designated container. They cannot be poured down the drain, on the ground, or allowed to evaporate.

B. Storage

1. All containers and secondary containers shall be labeled with appropriate hazard warnings.
2. Chemicals shall be kept in an approved container, prominently labeled. These containers shall not be used for any other purpose.

3. Chemicals shall not be stored near heaters, steam pipes or other sources of heat.

C. Handling

1. Only qualified and informed employees shall be assigned the responsibility of operating valves or other equipment, which controls the movement of chemicals.

2. Approved protective equipment and clothing as required by the MSDS shall be worn whenever chemicals may spill, splash, fly or drip upon the person handling them. Minimum protection shall be chemical goggles, face shield, chemical resistant gloves and apron.

3. Employees handling chemicals shall have quick access to an adequate supply of water for diluting and washing off any chemicals spilled on them or on their clothing. Eye wash stations and emergency showers shall be tested and operating before work begins.

4. Open flames and smoking are prohibited when working with, or near flammable or combustible chemicals, or acid in metal containers. Spark-proof tools shall always be used where there is danger of accumulated hydrogen (acid interacting with metals).

SECTION 4 - ELECTRICAL

4.1 GENERAL

A. Only qualified and authorized employees shall work on electrical equipment.

B. All power and extension cords shall have a grounding conductor. Extension cords shall not be used as main or permanent power sources.

C. Exposed wiring and cords with frayed or deteriorated insulation shall be repaired or replaced immediately.

D. Fixed cords and cables shall be protected from accidental damage.

E. Electrical equipment shall be free from recognized hazards that are likely to cause death or serious physical harm to employees.
F. All individual switches in the circuit breaker panel should be labeled to indicate their use or equipment served.

G. Sufficient access and working space shall be provided and maintained about all electrical equipment to permit ready and safe operations and maintenance.

4.2 LOCKOUT/TAGOUT

The OSHA standard on The Control of Hazardous Energy, lockout/tagout (29CFR 1910.147) covers the servicing and maintenance of machines and equipment in which the unexpected energization or start up of the machine or equipment or release of stored energy could cause injury to employees.

   A. The company should locate and label all isolating devices (switches, valves, circuit breakers, or other energy-isolating devices) for each piece of equipment that may need to be locked/tagged out.

   B. More than one energy source (electrical, mechanical, hydraulic, pneumatic, chemical, thermal, etc.) may need to be isolated.

   C. All applicable repairs and maintenance personnel shall be trained in the company’s Lockout/Tagout program.

4.3 PERSONAL PROTECTIVE EQUIPMENT

   A. While testing or troubleshooting energized equipment, the employee must wear either safety glasses or a face shield.

   B. When working on any energized circuitry or equipment the use of personal protective devices recommended in the National Electric Safety Code book is always encouraged, even if not required.

SECTION 5 - VEHICLE OPERATION

5.1 GENERAL

   A. Only those employees specifically certified and/or authorized shall operate company-owned motor vehicles and equipment.

   B. Drivers shall know and obey all company policies, state and local motor vehicle laws applicable to the operation of their vehicle.
C. Vehicles shall not be operated at speeds greater than that permitted by law or Company policy.

D. A driver or operator shall not permit unauthorized persons to drive, operate or ride in or on a company vehicle.

E. Where seat belts are provided, they shall be used, except for specific situations exempted by operating procedures.

F. Employees shall not permit anyone to ride on the running boards, fenders or any part of the vehicle except on the seats provided.

G. Employees shall not stand in moving vehicles, except in performance of specialized operations.

H. Employees shall not jump on or off vehicles.

I. Vehicles towed on any highway or byway shall be towed only with an approved properly rated tow bar designed for that vehicle.

J. When filling portable fuel containers, insure that only approved containers are used.

K. Before filling, always remove the container from the vehicle and place it on the ground at a safe distance from the vehicle (provides path to dissipate static charge to ground.)

L. Keep the nozzle in contact with the container inlet when filling (to dissipate static charge buildup from flow of gasoline).

5.2 VEHICLE SEARCHES

- All vehicles are subject to search upon entry to or exit from properties owned or controlled by our AI or our clients.

5.3 SPECIAL ENTRY AUTHORIZATION

- Vehicles entering property owned or controlled by our clients, may require proper authorization-verify prior to entry.

5.4 CELL PHONE USE

- Talking on cell phones while driving is prohibited.
5.5 PEDESTRIAN RIGHT-OF-WAY

- Pedestrians have the right-of-way.

5.6 PARKING

- Whenever possible, a parked vehicle shall be positioned to avoid the necessity of backing when travel is resumed.

5.7 BACKING PROCEDURES

A. When backing a vehicle, the operator shall:

1. Keep a constant lookout in all directions during the entire time he is backing.
2. Carefully check any blind areas
3. Back slowly, watching both side mirrors.
4. If any difficult backing situation or obstructed vision exists, the operator should enlist the help of another person on the ground as a guide. All signals shall be clearly understood before moving. The absence of a signal shall mean, "Stop."
5. When two (2) or more employees are in the vehicle, the employee who is the passenger shall assist the driver in any backing situations.

5.8 MATERIAL HAULING

A. The operator of a vehicle is responsible for the proper and legal securing of a material carried upon that vehicle.

B. The operator of a vehicle hauling material shall use due caution appropriate for the load being carried and prevailing conditions.

5.9 OPERATION

A. The driver of a vehicle shall be courteous toward other operators and pedestrians. He shall operate his vehicle in a safe manner and shall yield the right-of-way to pedestrians and other vehicles when failure to do so might endanger any person or vehicle.
B. The operator of a motor vehicle shall clearly signal his intention of turning passing or stopping.

C. Drivers shall be prepared to stop and yield the right-of-way in all instances where necessary to avoid an accident.

D. The driver shall stay a sufficient distance behind when following other vehicles so that he can safely stop the vehicle in the clear distance ahead.

E. Drivers shall exercise added caution when driving through residential and school zones.

F. When entering or leaving any building, enclosure, alley or street where vision is obstructed, a complete stop shall be made, and the driver shall proceed with caution.

G. All ignition systems shall be turned off and no smoking permitted while refueling.

H. When proceeding down grade, the clutch shall not be disengaged. Trucks with a heavy load shall be in a lower gear on steep grades.

SECTION 6 – FIRST AID

6.1 TREATMENT PROCEDURES

A. Minor Injuries – Includes sprains, strains, abrasions, minor burns, cuts, and/or puncture wounds, which are not bleeding profusely. The injured party has not lost consciousness and is coherent.

1. Each work location or facility should have a well-equipped First Aid Kit within easy access. Each kit should be equipped at all times with protective gloves to avoid skin to blood contact.

2. Provide the necessary first aid material to the injured party, and have them treat themselves. Do not allow yourself to come into contact with any bodily fluids (e.g. blood, bloody saliva, vomit, etc). Essentially facilitate self-treatment.

B. Serious Injuries – Includes significant cuts, amputations, serious burns, punctures, unconsciousness, or a person who cannot perform self-treatment, nor transport themselves to a medical facility.
1. 911 shall be called immediately when an employee is injured and cannot administer “self-treatment”. Only trained personnel shall attend to a seriously injured employee.

2. Only properly trained individuals should perform CPR and/or First Aid treatment for serious injuries.

3. Only properly trained individuals shall tend to injured employees, who cannot be transported to a medical facility without contaminating other personnel or vehicles (911 shall be summoned to administer to the injured party).

4. Every effort shall be made to avoid contact with any bodily fluids, which contain or are believed to contain blood. Only Blood Borne Pathogen trained personnel are authorized to clean up blood contaminated areas.

5. Each work facility is to be equipped with a one-time use Blood Borne Pathogen clean up kit.
ANDREWS INTERNATIONAL

BLOODBORNE PATHOGENS PROGRAM

IV

August 22, 2009
## TABLE OF CONTENTS

<table>
<thead>
<tr>
<th>SECTION NO.</th>
<th>DESCRIPTION</th>
<th>PAGE NO.</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.0</td>
<td>INTRODUCTION</td>
<td>61</td>
</tr>
<tr>
<td>2.0</td>
<td>UNIVERSAL PRECAUTIONS</td>
<td>61</td>
</tr>
<tr>
<td>3.0</td>
<td>PERSONAL PROTECTION EQUIPMENT</td>
<td>61</td>
</tr>
<tr>
<td>4.0</td>
<td>INFORMATION AND TRAINING</td>
<td>61</td>
</tr>
<tr>
<td>5.0</td>
<td>EXPOSURE RESPONSE</td>
<td>62</td>
</tr>
<tr>
<td>6.0</td>
<td>IMMEDIATE ON-SITE RESPONSE TO EXPOSURE</td>
<td>62</td>
</tr>
</tbody>
</table>
BLOODBORNE PATHOGENS EXPOSURE CONTROL PLAN

1.0 INTRODUCTION

There is a potential for exposure to blood borne pathogens while performing your job. This program applies to all employees who, in the normal course of job duties, may have a reasonable likelihood of being exposed to human blood, blood components, products made from human blood, body fluid, human tissue, or other potentially infectious materials.

2.0 UNIVERSAL PRECAUTIONS

“Universal precautions” recognizes all body fluids as though they are infected with blood borne pathogens. This method of infection control requires the employer and employees to assume that all human blood and human body fluids are infectious for HIV, HBV, and other blood borne pathogens.

3.0 PERSONAL PROTECTIVE EQUIPMENT

The job site manager will assure appropriate, readily accessible personal protective equipment is available on the job site for employees. Supervisors are responsible for ensuring equipment is used when needed and used properly. Equipment must include approved disinfectant to clean disposable equipment prior to disposal. Otherwise, used potentially contaminated equipment and materials must be disposed in compliance with regulatory standards for infectious waste materials.

4.0 INFORMATION AND TRAINING

The Safety Manager is responsible for identifying those “at-risk” employees and for assuring training is provided to managers who supervise employees who have potential for exposures to blood borne pathogens. The managers are responsible for ensuring employees are trained. Refresher training is required every year. The training program will be tailored to the education and language level of the employees and will include:

1. Exposure potential on the job site
2. Personal protective equipment use, care and disposal
3. Medical surveillance and vaccinations
4. Recordkeeping requirements
5. Training records maintenance
6. Labels and signs required for storage and disposal of hazardous waste materials
7. Cleaning and sanitizing the work area
8. Storage, cleaning, disinfecting and disposal of equipment
9. Personal hygiene
5.0 EXPOSURE RESPONSE

Following a report of an exposure incident, the employer will make immediately available to the employee a confidential medical evaluation and follow-up of the incident. Russell Warner will document the route of exposure, the circumstances under which the exposure occurred and identify the source of the exposure if possible.

6.0 IMMEDIATE ON-SITE RESPONSE TO EXPOSURE

- If exposure occurs or is suspected, the affected employee must properly dispose of any personal protective gear that may have been contaminated and any potentially contaminated items.

- The employee must then thoroughly wash hands and/or contacted skin with soap and water.

- The employee must report the incident to the immediate supervisor.

- The supervisor should send the employee to the nearest medical facility with the all known information concerning the contaminant.

- The supervisor should contact the medical facility to advise them of the arrival of the employee and the circumstances of the potential contamination.

- The supervisor must prepare an incident report.

- The results of any medical procedure will be kept confidential. The results of any tests performed will only be released to the individual tested and their designated primary care physician, if requested.

- The employee must consent to any test before it is performed and a copy of the signed consent form must be placed in the employee’s confidential medical file.
ANDREWS INTERNATIONAL

ALCOHOL, DRUG AND CONTRABAND POLICY

V

August 22, 2009
# Alcohol, Drug and Contraband Policy

## Table of Contents

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alcohol, Drug and Contraband Policy</td>
<td>65</td>
</tr>
<tr>
<td>I. Purpose</td>
<td>65</td>
</tr>
<tr>
<td>II. Definitions</td>
<td>65</td>
</tr>
<tr>
<td>III. Prohibitions</td>
<td>65</td>
</tr>
<tr>
<td>IV. Searches and Inspections</td>
<td>66</td>
</tr>
<tr>
<td>V. Testing</td>
<td>66</td>
</tr>
<tr>
<td>VI. Non-Compliance</td>
<td>69</td>
</tr>
<tr>
<td>VII. Drug Awareness</td>
<td>69</td>
</tr>
<tr>
<td>VIII. Exemptions</td>
<td>69</td>
</tr>
<tr>
<td>IX. Applicable Laws</td>
<td>69</td>
</tr>
<tr>
<td>X. Audit</td>
<td>69</td>
</tr>
</tbody>
</table>

August 22, 2009
ANDREWS INTERNATIONAL

Alcohol, Drug and Contraband Policy

I. Purpose
To ensure a safe, healthy, and productive work environment for the employees of our company and others on AI property or on business assignment, to protect AI property and assets, and to ensure efficient operations, we have and enforce a written policy on drugs, alcohol, and other prohibited items.

II. Definitions

A. Personnel: any of our company’s employees, agents, subcontractors or subcontractors’ employees.

B. AI Property: all real or tangible personal property, including facilities, buildings, vehicles, products and equipment either owned or controlled by AI.

C. Prohibited Substances: (1) illicit or un-prescribed drugs, controlled substances and mood altering substances, (2) prescribed drugs used in a manner inconsistent with the prescription, and (3) alcoholic beverages.

D. Reasonable Suspicion: a belief based on event, action(s), or circumstance sufficient to cause objective conclusion of suspicion.

E. Under the Influence: (1) the presence of a Prohibited Substance, or metabolite of a Prohibited Substance in body fluids above the cut-off level established by our company’s policy, or other commonly accepted cut-off level and/or (2) the presence of a Prohibited Substance that affects an individual in any detectable manner. The symptoms of influence may be, but are not limited to slurred speech or difficulty in maintaining balance.

III. Prohibitions
Unless specifically authorized in writing by AI, our policy shall prohibit company personnel from the following:

A. Using, possessing, selling, manufacturing, distributing, concealing, or transporting on AI property any of the following items:

1. Alcohol, Alcoholic Beverage, or any Prohibited Substance;

2. Contraband, including firearms, ammunition, explosives, and weapons;

3. Illicit drug equipment and paraphernalia.
B. While on AI property possessing or using prescription drugs or over-the-counter medication that may cause impairment except when all of the following conditions have been met:

1. Prescription drugs have been prescribed by a licensed physician for the person in possession of the drugs.

2. A licensed pharmacist filled the prescription for the person possessing the drugs.

3. The individual notifies his supervisor, if he will be in possession of, or using, impairing-causing prescription drugs or over-the-counter medication and appropriate steps are taken to accommodate the possibility of impairment, including but not limited to, removal from work for the period of possible impairment.

C. Being under the influence of Prohibited Substances while performing any work for AI.

D. Switching or adulterating any urine, blood or other sample used for testing.

E. Performing work for AI if that person has tested positive, or refused testing, in any employment-related test except personnel seeking access to AI property may be considered if the positive employment-related test in question was an initial pre-employment test administered more than twelve months before and the employee will not perform in a designated-like position. The prohibition in part III (E) will not apply to personnel seeking access to AI property for low-exposure positions whose employment-related positive test did not occur during employment on AI property, or work.

IV. **Searches and Inspections**

On AI property or at any business assignment site AI may, at any time have our company supervisors and/or authorized search and inspection specialist, including scent-trained animals, conduct unannounced searches and inspections of our company occupied sites and/or personal and their property; that property may include, but is not limited to, the following: wallets, purses, lockers, baggage, office, desks, tool boxes, clothing, company owned/operated, and employee personal vehicles.

V. **Testing**

A. Categories

All personnel shall be assigned to one of the following categories based on the individual’s job function:
Comparable-to-Designated: Has a high exposure to a catastrophic operational incident; has a direct role in operations where failure could result in serious harm to the public or employee well-being, company assets, or the environment; and has no direct or very limited supervision available to provide operational checks.

Safety-Sensitive: Has a high exposure to catastrophic operational incident and has access to operations, where failure could result in serious harm to public or employee well-being, company assets, or the environment.

Low exposure: Has an indirect role and no access to operations where failure could result in serious harm to public, or employee's well-being, company assets or the environment.

All positions are “safety-sensitive” unless a position, or positions, is/are identified as “low-exposure” or “comparable-to-designated”. If AI determines that additional positions require treatment as “low-exposure” or “comparable-to-designated,” AI may at its sole discretion, after notification, modify its Drug, Alcohol and Contraband Policy requirements.

Our company shall ensure that alcohol and drug tests are conducted according to the following requirements as defined in Paragraph B below:

<table>
<thead>
<tr>
<th>Job Category</th>
<th>Suspicion</th>
<th>Post-Incident</th>
<th>Pre-Access</th>
<th>Random</th>
</tr>
</thead>
<tbody>
<tr>
<td>Comparable-to-Designated</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Safety-Sensitive</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Low-Exposure</td>
<td>X</td>
<td>X</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

In addition, executives of our company are encouraged to be subject to the same random alcohol and drug-testing program that they require of their employees to demonstrate commitment to a substance-free workplace.

B. Requirements

1. Pre-Access Testing:
   a. Personnel requiring pre-access testing must have received a negative result on a comprehensive alcohol and drug test within the 12 months preceding those personnel’s first access to AI property.
   b. A single letter certifying negative test results for all personnel requiring
site access is preferred.

c. Our company will provide no information to its clients identifying individuals who have positive pre-access tests.

2. Random Testing:

   a. **Personnel requiring random testing will be subject to unannounced and continuous random selection and testing for Prohibited Substances while performing work for AI.**

   b. The number of tests randomly conducted during each calendar year must be at least the current DOT required percentage

   c. Where testing is not required by DOT, at least sixty-seven percent (67%) of the number of personnel in the random selection pool.

3. Post-Incident Testing:

   a. If our company determines from the best information available immediately after a work-related incident that performance of one or more of our personnel contributed to the incident, or cannot be completely discounted as a contributing factor to the incident, our company shall remove that/those individual(s) from our clients property and surrender his/her/their site credentials to a AI supervisor.

   Employees of AI may be required to submit to a medical evaluation or to Alcohol and/or Drug Testing where cause exists to suspect alcohol or drug use, including workplace incident, to include near miss, injury or non-injury event, or property damage.

   b. An individual so removed will be allowed to return to work on our client’s or AI’s property only after our company conducts alcohol and drug testing on the individual as soon as possible following the individual’s removal from the site, and our company certifies in writing the test identification number, the individual’s social security number, the test date and time, and a negative test result.

4. Reasonable Suspicion Testing:

   a. Upon Reasonable Suspicion of impairment or under the influence of a Prohibited Substance while on AI or client property, our company shall remove the AI employee(s) from AI or client property and surrender his/her site credentials.

   b. An individual removed from AI or client property for Reasonable Suspicion will be allowed to return to work on AI or client property only
after our company conducts alcohol and drug testing on the individual as soon as possible following the individual’s removal from the site, and our company certifies in writing the test identification number, the individual’s social security number, the test date and time, and a negative test result.

C. Our company’s policy specifies substances, and threshold levels that comply, at a minimum, with the Department of Transportation (DOT) alcohol and drug testing regulations. Our company’s collection, chain-of-custody and other related procedures are consistent with sound industry practice. Our company will include alcohol in any test panel regardless of any lesser DOT requirement.

D. Our company uses only testing laboratories that are properly certified under a recognized state or national program.

VI. **Non-Compliance**
Any personnel found in violation of our company’s policy or who refuse to cooperate with the searches and tests included in our company’s policy shall have their employment terminated.

VII. **Drug Awareness**
Our company warrants that personnel performing work have each been fully informed of the requirements of AI’s Drug, Alcohol and Contraband Policy requirements and that before beginning work each has signed a written certification that he has been so informed and agrees to be bound by those requirements.

VIII. **Exemptions**
AI management may, at its sole discretion, grant certain exemptions from our company’s Drug, Alcohol and Contraband Policy requirements. Exemptions are valid only if in writing. No exemption will be construed by our company as a promise of any future exemptions and maybe revoked at any time.

IX. **Applicable Laws**
Our company shall comply with all applicable federal, state, and local drug and alcohol related laws and regulations (e.g., DOT regulations, Department of Defense (DOD) Drug-Free Workforce Policy, and the Drug-Free Workplace Act of 1988).

X. **Audit**

A. Our company shall keep records required by State and Federal regulations available for inspection for a period of three (3) years after its termination.

B. AI and clients shall at its discretion, perform audits of our company’s alcohol
and drug program to verify that our policy and its enforcement comply with all regulations.

C. At a clients request our company will provide separate lists of Personnel (including name and Social Security Number) who were eligible for their work on a date specified by them in Safety-Sensitive Positions or Jobs Comparable to Designated Positions. Upon further request, our company will provide clients with the following information on each alcohol and drug test conducted for each personnel identified by a client from those lists:

1. Date of and type of test (e.g. random, pre-access)

2. Laboratory chain-of-custody identification number and/or test number.

D. Our company will obtain an agreement from any specimen collection service, laboratory and/or Medical Review Officer providing drug/alcohol testing services under this agreement that upon submission by Al of a list or lists, of Social Security Numbers, chain-of-custody ID numbers and test dates: 1) the laboratory will verify that the tests were conducted as represented; and 2) the

E. Laboratory and/or our company’s Medical Review Officer will provide a sworn statement that each of the tests identified by Al was confirmed as negative or that it/he cannot swear.
Company Name, Address: Andrews International  
3396 Willow Lane, Suite 100, Westlake Village, CA 91361  
Company Fax: 805-777-1750  
Contact Person: Andrew Heider  
Contact Phone: 818-970-2000

Please perform the following substance abuse tests for the above referenced employee: 
(Indicate with an X in each box the test you wish performed)

<table>
<thead>
<tr>
<th>Type</th>
<th>Pre-Placement</th>
<th>Pre-Access</th>
<th>Random</th>
<th>Post-Accident</th>
<th>For Cause/RS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-DOT UDS</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>DOT UDS</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Non-DOT BAT</td>
<td>XXX</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>DOT BAT</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>“Quick” Card Test</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Please fax all positive Breath Alcohol Test reports to: Andrews International

Please mail the blue employer’s copy of the Custody & Control Form to: Andrews International

Please call results of the Breath Alcohol Test and Urine Drug Screen Results to: Andrews International

*We understand that Negative Results of both DOT & non-DOT urine drug screens are available within 24-48 hours. We also understand the Positive results may take longer to report due to GCMS confirmation and the DOT guidelines for reporting of a Positive result.

**Definitions**

UDS: Urine Drug Screen  
RS: Reasonable Suspicion  
“Quick” Card Test: In Vitro urine drug test requested post-accident policy
ANDREWS INTERNATIONAL

HOTEL LODGING

PROGRAM

VI

August 22, 2009
ANDREWS INTERNATIONAL

HOTEL LODGING PROGRAM
Table of contents

1.0 Hotel Lodging 74
1. Your Room 74
2. Elevators 74
3. Jumping 74
4. Call the Fire Department 75
5. Smoke 75
6. Panic 75
7. Exits 75

August 22, 2009
ANDREWS INTERNATIONAL

HOTEL LODGING PROGRAM

1.0 HOTEL LODGING

Have you ever been in a hotel during a fire? It is a frightening experience; you should start thinking about it. For instance, how would you have acted if you had been in these fires?

The Thomas Hotel, San Francisco, CA: 20 Dead.
The Gulf Hotel, Houston, TX: 54 Dead.
The La Salle Hotel, Chicago, IL: 61 Dead.
The Wincoff Hotel, Atlanta, GA: 119 Dead.

1. Your Room

Take a moment to get to know your room. Check the window type, where the phone is located or if there is a vent in the bathroom. Most bathrooms will have a vent with an electric motor. Turning on the fan will help vent smoke from the room. In the event of fire, fill the tub with water. This is for wetting sheets and towels for stuffing into cracks and not for submersion. The tub will be like a cooking pot when the water becomes heated. Use the ice bucket to bail water onto the door to keep it cool. The mattress can also be used to block the door but keep everything wet. Form a wet towel into a triangle and secure it around your mouth and nose. This will help you breathe. Waving a wet towel in a smoky room can help clear the smoke. Remove flammable material (i.e. curtains) from the window area. Bail water around the window to help keep the fire out of your room. The important thing to remember is to keep thinking of ways to help yourself and keep fighting. This will help you stay focused and out of a panic mode.

2. Elevators

Do not use the elevator as your means of escape. Elevators are not fire safe and may become damaged from the heat leaving you trapped. Always use the stairs as your escape route.

3. Jumping

Jumping is not a good idea unless you are on the bottom three floors. From the first floor you can step out to the ground, from the second and third floors you will probably sustain an injury but it is important to jump away from the building. Many people are
killed hitting the window sill on the floor below theirs. On the fourth floor and above, the jump will more than likely cause death. Jumping becomes an individual decision but attempt other life saving techniques first.

4. Call the Fire Department

Most hotels will not call the Fire Department until they have confirmed that a fire exists. Valuable time may be lost while verification occurs. Hotels are hesitant to disturb their guests. If you call the front desk to report a fire they will send someone to verify it before calling the Fire Department. Call the Fire Department directly when reporting a fire and give them all pertinent information.

Of course, there have been hundreds more with thousands of deaths. The majority of those people did not have to die.

It is important to remember that it is the byproducts of the fire that will most likely be the cause of death and not the fire itself. Super heated fire gases (smoke) and panic will almost always be the cause of loss of life. You must know how to avoid smoke and panic to survive a hotel fire.

5. Smoke

Smoke is not a true indicator that fire is near by. Air conditioning and air exchange systems will sometimes carry smoke form one room to another of from floor to floor. (Smoking and matches cause 70% of hotel fires).

Smoke rises and accumulates at the ceiling and works its way down to floor level. Get on your hands and knees or stomach and stay there as you make your way to an exit. When in a smoke environment you may not be able to see the “Exit” sign as they are placed above doorways. It is important to know where your exit is located.

6. Panic

Panic is a sudden overpowering fear that can cause you to become disorientated and unable to form clear thoughts. It may be fueled by your own personal terror or by others experiencing the same condition. Once panic takes over, it is hard to stop. It may cause you to lose perspective on where the exit is located, leaving you trapped in the smoke environment.

7. Exits

Exits are generally clearly marked with a lighted “Exit” sign above the doorway. When you arrive at the hotel take a minute to familiarize yourself with the exit locations on the ground floor and on the floor of your hotel room. If you are using the exit as an evacuation point, be sure to close the door behind you securely. This may prevent or reduce the amount of smoke in the stairwell. Use the handrails as you descend. If you
encounter a cloud of smoke on your way down, do not try to run through it. Instead, turn around and walk back up to a “clear” floor. Remember to hold on tight to the handrails as people on their way down will knock you down the stairs. When you reach a safe haven find the windward side (upwind) and wait for help to arrive. The roof is a good secondary haven to wait. Once you have exited onto the roof or from the building on the ground floor make sure to prop the door open. This is the only time that you will not secure the door behind you.
ANDREWS INTERNATIONAL

HYDROGEN SULFIDE

PROGRAM

August 22, 2009
ANDREWS INTERNATIONAL

HYDROGEN SULFIDE PROGRAM
TABLE OF CONTENTS

Hydrogen Sulfide Program 79
Objective 79
Hydrogen Sulfide, what is it? 79
Hydrogen Sulfide properties 79
Detection of Hydrogen Sulfide 79
Toxic Concentration of H2S 80
Personal Protection 80
What to do if someone is exposed 81

August 22, 2009
1.0 HYDROGEN SULFIDE

OBJECTIVE:

To assist you in learning about Hydrogen Sulfide (H2S) specifically

What is H2S?
Where do I find H2S?
What are the properties of H2S?
Detection
Protection
Rescue and Safety procedures

Hydrogen sulfide, what is it?

H2S is a highly toxic gas that can kill you very quickly if you are not aware of the hazards. It is formed by the decomposition of organic materials and can be found in many different industries. It is usually associated with the oil industry but can be found in sulfur recovery plants, commercial lavatories, underground mines, sewers, and in certain poultry and fishing industries. H2S is a poison and can cause death by paralyzing your respiratory system not allowing you to breathe. It is as poisonous as Hydrogen Cyanide, which is used for executions in the gas chamber.

Hydrogen Sulfide properties:

H2S has seven (7) different properties that are very important to remember:

1. H2S is an extremely toxic gas and can kill if given the opportunity.
2. It is a colorless gas that you cannot see.
3. It is heavier than air and will accumulate in low or poorly ventilated areas.
4. You can smell H2S in low concentrations. It smells like rotten eggs, but Never Depend on Your Sense of Smell to Detect H2S.
5. It burns with a blue flame, which produces Sulfur Dioxide; SO2 is also a very toxic gas.
6. It is also soluble in water.
7. It is corrosive to some metals

Detection of Hydrogen Sulfide:

There are four (4) ways you can accurately detect H2S:

1. Lead Acetate paper will readily react turning brown in the presence of H2S.
2. Electronic portable detectors.
3. Air sampling tubes (i.e. dragger strain tubes)
4. Fixed Electronic sensors

**Toxic concentration of H2S:**

<table>
<thead>
<tr>
<th>Concentration</th>
<th>Effect</th>
</tr>
</thead>
<tbody>
<tr>
<td>.13 PPM</td>
<td>Minimal detectable odor</td>
</tr>
<tr>
<td>4 PPM</td>
<td>Easily detectable odor</td>
</tr>
<tr>
<td>10 PPM</td>
<td>Eye irritation begins. Maximum OSHA permissible exposure limit</td>
</tr>
<tr>
<td>20-30 PPM</td>
<td>Strong Odor</td>
</tr>
<tr>
<td>100-200 PPM</td>
<td>Coughing, major mucous membrane irritation, sense of smell lost in few minutes. It is possible to lose your sense of smell at lower concentrations.</td>
</tr>
<tr>
<td>200-500 PPM</td>
<td>Loss of consciousness in minutes (depending on the person) death will follow in 30 minutes or less.</td>
</tr>
<tr>
<td>500-700 PPM</td>
<td>Rapid unconsciousness and death following shortly if not removed to fresh air. Breathing could stop at this level.</td>
</tr>
<tr>
<td>700-1000 PPM</td>
<td>Unconsciousness immediately and death within a few minutes. Person will most likely not be breathing when found.</td>
</tr>
<tr>
<td>1000-PPM</td>
<td>One to two breaths will bring unconsciousness and death. Victim will need artificial respiration to survive.</td>
</tr>
<tr>
<td>1 PPM</td>
<td>1 Part per Million would be comparable to 1 inch in 15 miles or one second of time in 11 days. H2S affects people in different ways. The reaction of the individual will depend on the duration of the exposure, the frequency of being exposed, the intensity or concentration of the exposure and the individual susceptibility of the person being exposed.</td>
</tr>
</tbody>
</table>

**Personal Protection:**

A Self-Contained Breathing Apparatus or (SCBA) or a supplied air system is the only acceptable respiratory protection at most facilities to protect you from H2S.

There are some problems when wearing a SCBA that you will need to be aware of:

*Beards or and facial hair that could potentially interfere with the seal of a SCBA is prohibited.*

Note: AI does not allow beards as part of their employment.
Wearing contact lenses is authorized but you must communicate that you are wearing these to your supervisor of the facility’s safety office.

Typically, corrective of prescription glasses cannot be worn with a SCBA.

Claustrophobia or other types of psychological problems could potentially become a concern if required to wear a SCBA.

What to do if someone is exposed:

The most important thing you can do for a person that is exposed to H2S is to Not panic. It will be very hard to hold yourself back when you see a co-worker Fall to H2S exposure. Do Not Attempt To Run In and Save the Person! Unfortunately, the end result of a rescuer attempting to save a person who is In a H2S environment of high concentration is the rescuer falling to the H2S and also becoming victims themselves. Follow these simple steps so you do Not become a victim.

1. Call for help before you do anything else. This will get someone on their way to assist you in the rescue. Let them know where you are, What happened, and what your next move is. If at all possible, wait for back-up to arrive.

2. Don your SCBA fully, tighten all of the straps, and make sure you Have plenty of air.

3. Remove the victim to fresh air.
4. Check the victim. Are they breathing? Do they have a pulse?
5. If they are not breathing, you will need to breathe for him or her using mouth to mouth breathing.

6. If the victim is breathing, keep them still and make them as comfortable as possible until help arrives. Never leave the victim.

If you suddenly find yourself in an H2S environment, hold your Breathe!! Don the nearest SCBA, leave the area upwind or cross wind and uphill.

Report the situation as quickly as possible.
HAZWOPER Training Program

<table>
<thead>
<tr>
<th>Section</th>
<th>Title</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.0</td>
<td>Purpose of the HAZWOPER Standard</td>
<td>84</td>
</tr>
<tr>
<td>2.0</td>
<td>Levels of Response</td>
<td>84</td>
</tr>
<tr>
<td>3.0</td>
<td>First Responder Awareness Level</td>
<td>85</td>
</tr>
<tr>
<td>4.0</td>
<td>Emergency Response Reporting Procedure</td>
<td>86</td>
</tr>
</tbody>
</table>
HAZWOPER TRAINING PROGRAM

1.0 PURPOSE OF THE HAZWOPER STANDARD

The Hazardous Waste Operations and Emergency Response (HAZWOPER) regulation requires all facilities that manufacture, handle, or transport hazardous materials to develop an emergency response plan to effectively respond to an incident involving the accidental release of a hazardous substance.

The emergency response plan at your facility identifies:

- The specific chain of command and different levels of response.
- Procedures to follow for notification, assessment, containment, and cleanup.
- Safety and health information regarding the specific risks and protective measures.
- Emergency evacuation and medical treatment procedures.
- Interfacing with outside sources.

2.0 LEVELS OF RESPONSE

Each hazardous material incident has a different level of response determined by the nature and quantity of the chemical, the type of hazard, and the level of effort required to control the incident.

1. Level 1 – First Responder Awareness Level
   First responders at the awareness level are likely to witness or discover a hazardous substance release and have the responsibility of identifying the substance (if possible), evacuating the area, and notifying personnel.

2. Level 2 – First Responder Operations Level
   First responders at the operations level have the responsibility of protecting persons, property, and/or the environment and to prevent spreading and exposures.

3. Level 3 – Hazardous Material Technician
   The hazardous material technician has the responsibility of stopping the release of hazardous substances.

4. Level 4 – Hazardous Material Specialist

5. Level 5 - Incident Commander
3.0 FIRST RESPONDER AWARENESS LEVEL

The responsibilities of the First Responder Awareness level are:

- Identification
- Evacuation
- Notification

3.1 Identification

The awareness level responder should be alert and aware of any potential problems, such as a hissing valve, leaking pipe, liquid on the floor, odors, or other deviations from standard operating procedures. This person should also be familiar with the hazardous materials stored or used in the work area.

Once a problem is recognized, the hazardous material needs to be identified. This must be done without putting yourself at risk of exposure. This can be done by reading the container labels and markings.

The Material Safety Data Sheet (MSDS) for the substance can also provide information about the substances in your work area, including how to recognize potential hazards. If there are no markings or labels that identify a substance, you can use its physical characteristics to help identify it. Determine if the substance is:

- A solid or a liquid?
- What color is it?
- Are there vapors and are they rising or falling?
- What type of container did the material spill from?
- What is the shape of the container?
- Is it a pipe leading into a piece of equipment?

NOTE: You should NEVER touch, taste, or smell a substance to try to identify it.

3.2 Evacuation

After the spill is identified, evacuation is the next step. Know the primary and secondary escape routes that are detailed in the emergency response plan. Depending on the nature of the release, other people in the vicinity may need to be notified to evacuate the area.

3.3 Notification

The final responsibility is to notify the proper internal emergency personnel. This should be done from a location that does not put the responder in danger. While notifying the proper personnel provide the following information:
• Exact location of the incident.
• Identification of the hazardous material.
• Nature and quantity of the release.

4.0 EMERGENCY RESPONSE REPORTING PROCEDURES

Contact Person Los Flores Canyon:

Telephone Number:

Contact Person AI Associates, Inc.:

Telephone Number

Shift Supervisor:

Telephone Number:

Type of Information Required

Location of the Incident: ________________________________________________

____________________________________________________________________

Nature of the Problem: ________________________________________________

____________________________________________________________________

Identification of the Substance: _________________________________________

____________________________________________________________________

Primary and Secondary Evacuation Routes:

I. Primary Route:

II. Secondary Route:

III. Location of Communication Devices in Your Area:
ANDREWS INTERNATIONAL

HAZARD COMMUNICATION IX

August 22, 2009
# HAZARD COMMUNICATION

<table>
<thead>
<tr>
<th>Section</th>
<th>Title</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.0</td>
<td>Chemical Hazards</td>
<td>89</td>
</tr>
<tr>
<td>2.0</td>
<td>Chemical Labels</td>
<td>90</td>
</tr>
<tr>
<td>3.0</td>
<td>Material Safety Data Sheet</td>
<td>91</td>
</tr>
<tr>
<td>4.0</td>
<td>Safety Practices</td>
<td>92</td>
</tr>
</tbody>
</table>
HAZARD COMMUNICATION

1.0 CHEMICAL HAZARDS

Chemical hazards can pose safety risks to your health and it is important to understand the potential health hazards. Hazardous chemicals may produce adverse health effects upon contact, either through contact with your skin or eyes, inhalation into your lungs, ingestion into your digestive tract. You will be provided with the necessary Personal Protective Equipment needed to limit your exposure such as safety goggles, respirators, or gloves. **It is your responsibility to understand the potential hazards of the chemicals in your work area and take any additional steps needed to further limit your exposure.**

1.1 Toxic Chemical

A toxic chemical attacks your internal organs, causing extreme illness or death. Contact with toxic chemicals should be avoided completely by using the appropriate Personal Protective Equipment.

1.2 Corrosive Chemical

A corrosive chemical will destroy living tissue upon contact, resulting in chemical burns and scarring. Avoid skin and eye contact with corrosive chemicals by using gloves and safety goggles.

1.3 Irritant

An irritant will react chemically with human tissue causing localized inflammation. Unlike corrosives, the effects of irritants are temporary and the inflammation is reversible.

**NOTE:** Hazardous chemicals may also have the potential to inflict physical harm through fire or explosion.

1.4 Combustible Chemicals

Combustible chemicals have a risk of catching fire when exposed to an ignition source, such as an open flame or sparks.
1.5 Flammable Chemicals

Flammable chemicals have an even higher risk of catching fire when exposed to an ignition source and are extremely dangerous. These types of chemicals must be kept away from sources of heat, flame, or sparks.

1.6 Explosive Chemical

An explosive chemical will explode if handled improperly. Explosive chemicals should always be handled with extra care, and should not be subjected to extreme pressure, high temperature, or sudden shock.

1.7 Oxidizer

An oxidizer will cause other chemicals mixed with it to burn more easily. Oxidizers strengthen fires and must be kept away from flammable materials at all times.

1.8 Reactive

A reactive chemical reacts violently when exposed to water. Reactive chemicals should never be exposed to, or used near sources of water.

2.0 CHEMICAL LABELS

Container labels provide information on a chemical’s potential hazards and precautions to take when handling them. All containers of hazardous chemicals are required to have container labels detailing the chemical’s name, the associated health risks and physical hazards of that chemical, and the name and address of its manufacturer. Ensure that the label is not damaged or missing. If so, report this to your supervisor. Also ensure that any chemical transferred to another container is properly labeled.

Four different standards for chemical warning labels are used:

- American National Standards Institute (ANSI)
- National Fire Protection Association (NFPA)
- National Paint and Coatings Association (NPCA)
- Department of Transportation (DOT)

Each of these types of labels provides similar information but is used in different applications.
2.1 **ANSI**

ANSI labels are primarily used for common chemicals. These rectangular labels are divided into three sections (from top to bottom) with the warning or signal word at the top, a symbol representing a key hazard in the middle section, and precautions to follow while handling the chemical in the lower third of the label.

2.2 **NFPA**

The NFPA uses a diamond label divided into four sections. The top three sections represent particular hazards: flammability in red, instability in yellow, and the overall health hazard in blue. The severity of each hazard is given a rating on a scale of 0 to 4, with 4 being extremely hazardous.

The white section at the bottom of the diamond is used to display any unique hazards such as the chemical being reactive to water.

2.3 **NPCA**

The NPCA’s label is a five-part rectangle, three of which are color-coded representing a particular hazard. Orange represents the physical hazard, red for the flammability hazard, and blue for the overall health hazard. (An asterisk in the health section denotes a chronic health risk which may become evident over repeated exposures). The severity of each hazard is rated on a scale of 0 to 4, with 4 being the most hazardous.

The white section is used to list the Personal Protective Equipment to use while handling the chemical, designated by an alphabetic code.

Older versions of the NPCA label will provide a reactivity section in place of a physical hazard section, and the chronic health hazard box may be missing.

2.4 **DOT**

The Department of Transportation placards are used primarily in the transportation of hazardous materials. The DOT hazard labels are color-coded diamonds, consisting of a word and symbol describing a chemical’s major hazard.

3.0 **MATERIAL SAFETY DATA SHEETS**

The Material Safety Data Sheet (MSDS) is a hazardous chemical’s handbook, containing all the information needed to safely handle a hazardous chemical. Use the MSDS as a reference to know and understand the nature of the chemicals in your work area. An MSDS must be available for every hazardous chemical you may be exposed to at your work place.
MSDS’s may come in a variety of formats, but they all must contain information on at least the following:

- Identity of the substance.
- Physical and chemical characteristics.
- Physical and health hazards.
- Permissible exposure limits.
- Possible carcinogen hazard.
- Precautions for safe handling and procedures for clean up in case of spills.
- Control measures to limit exposure.
- Emergency and first aid procedures.

4.0 SAFETY PRACTICES

4.1 Potential Hazards

Understand a chemical’s potential hazards. This information is readily available from the container labels on the chemicals themselves. The MSDS is a second source that will provide you with a more detailed list of hazards, including symptoms to look for if an exposure has occurred.

4.2 Minimizing Exposures

The MSDS contains sections titled “Exposure Controls” and “Personal Protection” that list the Personal Protective Equipment needed to safely handle the chemical. This information can also be found on certain chemical warning labels.

4.3 First Aid

The First Aid Measures section of the MSDS will list the first aid procedure to follow in the event of exposure with the chemical.

4.4 Flammability

The Fire Fighting Measures section of the MSDS will explain what procedure to follow when fighting a fire involving a hazardous chemical, and what extinguishing media should be used. This section also provides information on the chemical’s flammability such as flash point and explosive limits. (The flash point is the lowest temperature at which a chemical can form an ignitable mixture). The lower the flash point, the easier it is for the chemical to catch fire.

Explosive limits are concentrations of vapor in the air. Concentrations within the explosive limits can ignite easily, and are dangerous. Above the upper explosive limit, the mixture is too low in oxygen to ignite, and below the lower explosive limit, the mixture is too rich in oxygen to ignite.
Both the NFPA Hazard Diamond and the HMIS have a flammability section to gauge how easily the chemical can be ignited.

### 4.5 Detection and Procedures

The Physical and Chemical Properties section of the MSDS will list a chemical’s physical characteristics, such as color and odor. This information will help you detect spills and releases of a hazardous chemical.

The Accidental Release Measures section of the MSDS will describe how to safely clean up a spill.
The following procedures are to be followed by the first line supervisor in the event of an injury to one of his/her employees:

- Administer first aid by a qualified individual
- Within jurisdictional limits, refer to the designated physician/medical facility
  Managers/Supervisors shall be aware of which medical facility to use.
- Arrange transportation if necessary
- **Accompany the injured employee to the doctor/hospital**
- Administer an Alcohol/Drug Test when appropriate.
- Provide “Physician Packet” (obtained from the injury Coordinator) for Employee to give to physician.
- If the Physician indicates the injured employee can not return to normal duties, The Manager/Supervisor shall discuss AI’s light/restricted duty policy with the physical.
- Advise the employee to return the Physician “Return to Work Form”, following the initial treatment to his Manager/Supervisor.
- Report the injury to the Injury Coordinator (**Dan Hoffman**) As soon as possible.
- Conduct an accident investigation and report the findings to the Injury Coordinator. The report shall include the fundamental cause analysis (FCA) using the following outline:
  
  a. Account name and location
  b. Type of injury/illness
  c. Incident description (very brief) and body part(s) affected
  d. The amount of time the officer had on the job (experience)
  e. The number of times the officer had previously performed task
  f. Why was this activity taking place?
  g. Were there any factors regarding equipment?
  h. Any other information that may have an impact on the incident:
     - Hurrying-Horseplay
     - Inattention
     - Weather
     - Lightings
     - Hazard
     - Equipment Failure
     - Job knowledge
     - Deviation from the norm
i. Identify fundamental cause of injury
j. State what corrective action has been done by site Manager/Supervisor to ensure no like injuries will occur

➢ If the injured employee is unable to return to work, the Injury Coordinator will:

➢ Maintain contact with the employee, physician, and claims representative.
➢ Determine medical and disability status on ongoing basis.
➢ Request periodical medical physician reports.
➢ Obtain Return to Work Form when employee returns to work.

If you have questions, or any information, contact one of your Injury Coordinator.
Medical Treatment Refusal

I, ____________________________ do hereby report and acknowledge the following facts:

Print Employee Name

II. On ________________, I did sustain a work related injury during my employment with Advanced-Tech Security Services, Inc. to the following parts of my body:

1. _____________________________  4. _____________________________
2. _____________________________  5. _____________________________
3. _____________________________  6. _____________________________

III. No other part of my body was injured or affected regarding this work-related injury.

   Initials __________

IV. As a result of this work-related injury, Advanced-Tech Security Services, Inc. has offered to provide medical treatment to me. I have refused this treatment because I do not believe it is necessary. I am presently able to fully perform my normal work duties without restriction or impairment.

   Initials __________

V. If my physical condition worsens to the point where I require medical treatment, I will immediately advise my direct supervisor of that fact. I understand that Andrews International will provide all reasonable medical treatment to me that is necessary because of this work-related injury.

   Initials __________

VI. I have signed this document in a free and voluntary manner, and do hereby certify and declare that the above facts are true and correct.

   Initials __________

Date ____________________    Time ____________________

Employee Signature

Date ____________________    Time ____________________

AI Supervisor/Witness
ANDREWS
INTERNATIONAL

SHORT SERVICE EMPLOYEES

PROGRAM

XI

August 22, 2009
SHORT SERVICE EMPLOYEE PROGRAM

SHORT SERVICE EMPLOYEE (SSE)

A. Definition
Short Service Employees (SSE's) are defined as any employee with less than six (6) months of continuous service with AI at a Clients site that may be hazardous. SSE is further defined as any employee with less than six (6) months of continuous service within a specific job activity that may be hazardous or anyone who has not demonstrated a standard level of proficiency in their responsibilities.

B. Notification
AI personnel maintain a sign-in roster for all personnel. At that time, the employee is identified as a SSE and it is noted on the roster. AI personnel provide new or SSE employees with all pertinent training specific for their job site and then are provided with a yellow hard hat to wear or have a yellow sticker applied to their white hard hat as identification to ensure that all personnel are aware of their status as a SSE.

C. Mentor
An AI Supervisor/Trainer provides close supervision during an employee's six (6) month status as a SSE. The Supervisor/Trainer ensures that the SSE properly performs any related task and provides additional training if needed.

D. Reporting
The Supervisor/Trainer will note on the sign-in roster the tenure and progress of a SSE for documentation purposes. If an SSE does not demonstrate a satisfactory rate of progress a report will be filed documenting the employee’s deficiencies and the remedial process used to correct the problem. The Supervisor/Trainer will advise the clients Manager/Supervisor of the SSE’S progress.

E. Completion
In order for an employee to be removed from status as a SSE, they must convince the AI Supervisor/Trainer that they have a working knowledge of the specific job and know the safety requirements. The employee must demonstrate a standard level of proficiency in all related tasks. At that time, if the Andrews International Supervisor/Trainer is satisfied with the SSE’s Capabilities; the Supervisor/Trainer may remove the employee from SSE status upon receiving acknowledgement from the client’s Manager/Supervisor.
ANDREWS INTERNATIONAL

JOB SAFETY ANALYSIS PROGRAM

XII

August 22, 2009
ANDREWS INTERNATIONAL

JOB SAFETY ANALYSIS
(JSA)

JOB SAFETY ANALYSIS

A. Safety

All AI employees are responsible for performing their duties in a safe manner in order to prevent accidents and injuries to oneself and to others. No business objective is so important that it will be pursued at the sacrifice of safety. Safe conduct of operations is a condition of employment for all AI employees.

B. Work Activities

Pre-planning is an essential part of eliminating accidents and injuries in the workplace. Prior to beginning any job action, task, or operation, employees shall:
- Understand the safe working conditions of the job by
  - Reviewing appropriate section(s) in the Safety Manual
  - Participate in any pre-job planning meetings including meetings where task-specific Procedures or job safety analyses are developed and reviewed
  - Ask for explanations of special hazards or risks associated with unfamiliar or hazardous activities

Assess the hazards and risks involved in the job and ensure that appropriate safety precautions are taken before, during, and after the task, and
- Communicate with other affected personnel about activities that might present a hazard or risk.

C. Safety Responsibilities

Employees must:
- Know and use the Safety Manual rules applicable to their work as well as the applicable safe work practices
- Intervene if hazardous or unsafe behavior is observed in the workplace
- Promptly report hazards, safety incidents, and near misses to their immediate supervisor
- Comply with all federal, state, and local safety and health related regulations.
D. Responsibilities

AI supervisors or representatives in charge are responsible for:

- Understanding the safe working conditions of a job
- Ensuring that employees are familiar with the specific job to be performed
- Reviewing the specific JSA for the task to be performed
- Ensuring that all employees involved in the task understand and comply with the instructions in the JSA
- Reviewing and updating all JSA’s on a regular basis.
ANDREWS
INTERNATIONAL

PROTECTIVE EQUIPMENT
PROGRAM

XIII

August 22, 2009
PERSONNEL PROTECTIVE EQUIPMENT

A. General Information

Personal Protective Equipment (PPE) is vital to the safety of each employee. PPE establishes a barrier between the worker and any potential hazard but does not completely eliminate the hazard. Specific PPE has been recognized as appropriate for security sites involving AI employees that include:

- hard hats
- eye protection
- ear protection
- safety boots (steel-toe) or work shoes

(NOTE: AI will provide all necessary PPE except safety boots and/or work shoes.)

The appropriate PPE shall be used during any job action where the PPE has been identified for use and in conjunction with any and all attempts to eliminate or reduce a potential hazard. PPE shall not be used as the sole consideration for the elimination of a potential hazard.

B. Responsibilities

All personnel shall be trained in the proper use of the appropriate PPE identified for any job action. They must be trained to:

- Be aware of situations requiring PPE in their work area
- Select the appropriate PPE based on the potential hazards
- Wear the PPE according to the manufacturer’s instructions
- Understand the limitations of the PPE
C. PPE Inspection and Maintenance

All PPE must be inspected, maintained, stored, and used properly. All employees must notify their supervisor when any excessive wear or defect causes a PPE to no longer provide the intended level of protection. The PPE must then be repaired or replaced immediately. PPE, which is no longer serviceable, shall be destroyed before being discarded to ensure that no unsafe PPE is used during any job action.
ANDREWS INTERNATIONAL

NEAR MISS PROGRAM

XIV

August 22, 2009
NEAR MISS REPORTING PROCEDURES

NEAR MISSES

A. Hazardous Conditions

Personnel shall always be alert to hazardous conditions and unsafe actions by other employees and personnel that might cause accidents and injuries. It is the responsibility of each employee to take immediate corrective action if possible, or ensure that notification of an unsafe work condition is made to the appropriate Contract Supervisor.

B. Communicating Hazardous Conditions

Personnel on duty or just going off duty shall inform all oncoming duty personnel of any changes or work conditions that might present a hazard. Prior to the start of a job action or at the time a hazardous condition is recognized; the hazard should be addressed and corrected. If a hazardous situation cannot be corrected at that time then the hazard shall be appropriately and clearly marked to be visible to all personnel until the situation can be corrected.

C. Reporting Hazardous Conditions

Once a hazardous condition has been corrected or a clearly marked, the identifying employee shall, as soon as practicable, complete a Near Miss Incident Report documenting:

- Personnel involved
- Location of the hazard
- Type of hazard or action
- Supervisor notified
- Corrective actions taken
- Communications to other personnel

D. Follow-Up

Once a hazardous condition has been acted upon, it is the responsibility of each employee to observe and ensure that the hazard has been corrected and that any work actions by employees have been modified and comply with the appropriate safety procedures.
ANDREWS INTERNATIONAL

PANDEMIC PLAN

April 2009
Pandemic Plan

It is Andrews International’s policy to safeguard and protect employees, tenants, guests and the public against the loss of life or personal injury and to protect all clients’ assets against loss due to any man made or natural disaster.

Andrews International is committed to carefully monitoring any possibility of a pandemic in any of the regions where they do business. The impact of a pandemic cannot be predicted precisely because it will depend on the virulence of the virus, how rapidly it spreads, the availability of vaccines and antiviral medications, and the effectiveness of pharmaceutical and non-pharmaceutical community containment measures.

The Andrews International pandemic plan is based on the framework of the World Health Organization’s (WHO) Pandemic Phases.

INTERPANDEMIC PERIOD

**WHO Phase 1:** No new influenza virus subtypes have been detected in humans. An influenza virus subtype that has caused human infection or disease may or may not be present in animals. If present in animals, the risk of human infection or disease is considered to be low.

**WHO Phase 2:** No new influenza virus subtypes have been detected in humans. However, a circulating animal influenza virus subtype poses a substantial risk of human disease. The distinction between Phases 1 and 2 is based on the risk of human infection or disease resulting from circulating strains in animals, as assessed by various factors and their relative importance according to current scientific knowledge. Factors may include pathogenicity in animals and humans, occurrence in domesticated animals and livestock, (as opposed to only in wildlife), whether the virus is enzootic or epizootic, and whether the virus is geographically localized.

PANDEMIC ALERT PERIOD
WHO Phase 3: Humans have been infected with a novel virus subtype, but human-to-human spread has not occurred, or it has occurred in only rare instances of close contact.

WHO Phase 4: Small cluster(s) of cases with limited human-to-human transmission are documented, but spread is highly localized, the virus is not well adapted to humans.

WHO Phase 5: Larger cluster(s) appear, but human-to-human spread is still localized, suggesting that the virus is becoming increasingly better adapted to humans, but may not yet be highly transmissible. The risk of pandemic is now substantial.

PANDEMIC PERIOD

WHO Phase 6: Increased and sustained transmission is documented in the general population.

POSTPANDEMIC PERIOD

Although not part of the WHO Phases for tracking the emergence of a pandemic, mitigation and recovery are essential for emergency planning and are incorporated as a part of this plan. Mitigation and recovery should focus on continuing public health actions, including communication with the public on issues such as when public gatherings can resume and continued monitoring of possible outbreaks of infection.

IMPORTANT POINTS: For the Andrews International Pandemic Plan

- A pandemic is a public health emergency that rapidly takes on substantial political, social, and economic dimensions. A broad range of private sector partners and government agencies, in addition to those dealing with public health, should be engaged in pandemic preparedness planning. A pandemic is likely to affect everyone in the United States: no amount of planning will allow “business as usual” in any sector of society or government.

- The course of pandemic influenza will be governed by factors that cannot be known in advance. Properties of the novel virus, including virulence, principal mode of transmission, timing and duration of viral shedding, and attack rate in different risk groups may differ from those of seasonal influenza strains.
The first human cases of infection with a novel influenza virus will likely occur outside of the U.S. and will be detected by the global surveillance network. An influenza pandemic could last from 18 months to several years, with two to three waves of activity.

RESPONSIBLE TEAM

The Emergency Executive Management Group as outlined in the Andrews International Emergency Operations Plan is responsible for the execution of the Pandemic Plan with the assistance of every employee in the company.

This plan should be used in conjunction with the Andrews International Emergency Operations Plan and the Business Continuity Plan.

PANDEMIC PLAN

WHO Phase 1 & 2:
Interpandemic Period: No novel influenza subtypes have been detected in humans, but a novel subtype that has caused human infection may be present or circulating in animals.

Andrews International will:
- Monitor local, regional, and national health organizations such as the Centers for Disease Control (CDC) and the WHO for any influenza outbreaks that could affect areas that AI does business.

WHO Phase 3 & 4:
Pandemic Alert Period: Human infection with no or very limited human-to-human transmission.

Andrews International will:
- On laboratory confirmation of the first case of novel influenza virus in the United States, develop and distribute guidance to regional offices on surveillance, case detection, and infection control measures.
- Provide communication tools for distribution to AI clients.
- Closely monitor any employees that have traveled to the affected areas for symptoms to quickly isolate and get treatment for them.

WHO Phase 5:
Pandemic Alert Period With Substantial Pandemic Risk: Larger clusters but still limited human-to-human transmission; sustained community transmission is possible.

Andrews International will:
  o Provide prophylactics to every site (i.e. sanitizing items, face masks, gloves, etc…) as needed or recommended by the CDC or the Emergency Executive Management Team.
  o Continue to monitor all employees for any symptoms.
  o Work with site supervisors where infected employees are out of work to get additional personnel assigned.

WHO Phase 6:
Pandemic Period: Increased and sustained transmission in the general population.

Andrews International will:
  o Provide prophylactics to every site (i.e. sanitizing items, face masks, gloves, etc…) as needed or recommended by the CDC or the Emergency Executive Management Team.
  o Continue to monitor all employees for any symptoms.
  o Work with site supervisors where infected employees are out of work to get additional personnel assigned.
  o Activate the Emergency Operations Plan in the areas that need the additional assistance due to an outbreak that affects AI employees or their clients.

Post Pandemic
Andrews International will:
  o Examine how employees were exposed and how the infection was spread through the work force.
  o If any actions can be taken to mitigate further outbreaks in the future, AI will work to implement them.
Protecting Your Organization from an Epidemic

The World Health Organization and the Centers for Disease Control are investigating the rapid spread of a virulent strain of the swine influenza virus. At Andrews International, we understand the importance of preparation, crisis management and appropriate response to ensure the safety of your employees, patrons, tenants and visitors; and want your organization to be prepared for the possibility of the pandemic affecting you and your business.

Tips in preparing for a pandemic:
- Activate your Crisis Management Plan; make sure every member is prepared with the lines of communication clearly outlined so that in the event of an outbreak, everyone is notified in a timely manner.
- Be open and honest with your employee population to prevent panic and rumors from spreading. Share your pandemic plan with all employees so that they are aware of what is expected should the need arise.
- Limit travel to Mexico as much as possible; for any unavoidable trips, it is imperative to be vigilant regarding any symptoms that suggest infection.
- Communicate to employees the importance of staying home when ill and remaining symptom free for 24 hours prior to returning to work.
- Make sure that there is plenty of hand soap, alcohol-based hand sanitizer and tissue available at each work site.
- Be cognizant of scheduling any event that would put large populations of your employees together where infections can spread much easier.

Tips in protecting yourself and others:
- Cover mouth/nose when sneezing and coughing. Wash hands with soap and water for at least 20 seconds immediately afterwards; or use sanitizer when washing is not an option.
- Avoid touching your eyes, nose and mouth.
- Be aware of and limit close personal contact (i.e. shaking hands, sitting in meetings and shared workstations).
Symptoms to watch for:

- Fever (greater than 100°F or 37.8°C)
- Cough
- Sore throat
- Head aches and joint aches
- Fatigue

For a checklist to see how prepared your organization is for a pandemic go to: http://www.pandemicflu.gov/plan/businesschecklist.html.


Having a pandemic plan in place for your organization is very important. To see the plan for your state go to: http://www.pandemicflu.gov/plan/stateplans.html

For guidelines on creating your own pandemic plan go to: http://www.hhs.gov/pandemicflu/plan/

Preparations and steps Andrews International has taken to ensure business continuity of our services during a potential pandemic include: notifying our employee population of the possible pandemic, preparing them with tips to keeping themselves and their families healthy, communicating the proper notification channels should any of our employees become ill, and emphasizing the need to stay isolated while ill and not coming into work. We also have business continuity plans in place through our Disaster and Emergency Response Teams, as well as personal protective equipment on standby through our national uniform supplier.
Andrews International’s objective is to effectively respond to both internal and external business disruptions, including AI’s obligation to customers in the event of a significant business disruption. Each AI office has responsibility for its own business continuity plan, with key support functions such as Operations, Human Resources, Financial, and Workforce Management readily available both from an IT/Communication/Software support standpoint, as well as personnel support when additional AI personnel is needed to appropriately respond to internal and client needs.

As with our other services, the emphasis of our business continuity planning program is on supporting maintenance and protection of business functions and not only on one particular section of an organization’s operations. Through our trained pool of personnel and resource network of consultants and alliance partners, Andrews International has the ability to respond to disasters and emergencies in conjunction with the various plans in your organization’s business continuation strategies.

During a significant event, public safety and security response may be delayed or non-existent. We understand the impact of a proactive approach in minimizing loss during a crisis situation. Protection of personnel, facilities and assets involves pre-deployment of resources at the earliest stages possible to proactively mitigate the event’s impact on business. AI’s resource expertise consists of licensed police officers, traditional uniformed security and armed security personnel with the necessary technical skills and experience to provide security and life safety services.

The mission of the Andrews International Disaster and Emergency Response Team (DERT) is to provide clients with a 24-hour a day support/response team that can expedite the restoration of order and normalcy to an extraordinary situation. Our experience and expertise enables us to focus on the deployment of specialized security teams, specifically trained to minimize and mitigate extreme security threats due to natural disasters or extraordinary events.

Internally, all of our operating systems are mirrored with redundancy on both the East and West Coast. We host our own internal email servers, with servers on both coasts. Each server primarily houses the
mailbox for that region, but also serves as a backup for each other. Our phone system is hosted by a 3rd party provider. Their systems are hosted in California and Virginia. If there is ever a fault at an AI office, we can change call routing online. These changes can be done right over the internet, and take effect immediately.

Our staffing and scheduling efficiency, combined with our communication structure, allows us the flexibility to respond with additional resources in a time of need. One of our greatest strengths is our commitment to our clients and our ability to respond to a client location in a time of crisis. This commitment has been demonstrated many times during the past decades. Our disaster response and business continuity planning includes:

1) Locate and assess client property, document issues as needed.
2) Establish protective details at unsecured properties.
3) Accompany and protect clients while traveling and working within the affected areas.
4) Locate and assist client employees displaced or thought to be missing.
5) Liaison with local authorities to facilitate assistance to client.
6) Contain client properties and control access by disaster and emergency response workers.

Enhance the feeling of normalcy more quickly, helping the client to return to business as soon as possible.

Andrews International wants your organization to be prepared for any potential pandemic. If our team can be of assistance in readying your crisis management program, please do not hesitate to contact us.
Resource Guide on Swine Influenza
(Updated April 28, 2009)

Swine Influenza
World Health Organization (WHO)
Information on evolving situation
Current WHO phase of pandemic alert
Director-General’s statement of April 27, 2009
Frequently asked questions (FAQs) about swine flu

Centers for Disease Control and Prevention (CDC)
Includes information on the international outbreak of swine flu, how the U.S. is preparing and responding, confirmed infections in the U.S., how the disease spreads, and much more.
http://www.cdc.gov/swineflu/
Interim Guidance for Nonpharmaceutical Community Mitigation
http://www.cdc.gov/swineflu/mitigation.htm
Keypoints/FAQs
http://www.asisonline.org/documents/swineflu_cdc_keypoints_042709_am.pdf
Pandemic Flu.Gov
Questions and answers on swine flu
http://pandemicflu.gov/faq/swineflu/

International SOS Swine Flu update
News feed on international swine flu updates

U.S. Department of Agriculture
Frequently asked questions (FAQs) about swine flu

U.S. Department of Homeland Security
FAQs (27.4.2009)

White House
April 26, 2009 Press Briefing on swine flu (transcript)

Office of Personnel Management (U.S.)

U.S. Department of State
Travel information relating to swine flu
http://travel.state.gov/travel/cis_pa_tw/pa/pa_4488.html

Overseas Security Advisory Council (OSAC) (members only)
Brazil Swine Flu Information: No Confirmed Cases (27.4.2009)
Hong Kong Elevates Influenza Pandemic Alert (26.4.2009)
Russian Swine Flu Entry Screening (26.4.2009)

Public Health Agency of Canada
Swine flu information
European Union
April 27, 2009 briefing from European Commissioner for Health (video)
http://ec.europa.eu/avservices/player/streaming.cfm?type=eb&sid=140458

United Kingdom: National Health Service
Information on swine flu
http://www.nhs.uk/conditions/pandemic-flu/Pages/Introduction.aspx

Government of New Zealand
Updates on swine flu

Financial Services Information Sharing and Analysis Center (IF-ISAC)
Travel Warning

General Information on Pandemic Influenza

Pandemic Influenza
This website created by the U.S. Government as a one-stop access point for avian and pandemic flu information. Includes information on the current situation, how the U.S is preparing, community strategy for pandemic flu mitigation, vaccination and treatment, the possible impacts of a pandemic, a fact sheet, and the history of pandemics, plus much more.
http://www.pandemicflu.gov/general/
Community Strategy for Pandemic Flu Mitigation (updated February 2007)
http://www.pandemicflu.gov/plan/community/commitigation.html

Pandemic Preparedness Information from the World Health Organization (WHO)
Defines an influenza pandemic, explains how a new influenza virus can cause a pandemic, presents the consequences of an influenza pandemic, explains the global surveillance systems, and provides links to other pandemic plans from other nations.
Health Map: Global Diseases Alert Map
Very detailed and comprehensive global disease alert maps, created by Children’s Hospital.
Includes global alert links from various sources and Twitter.
http://healthmap.org/en

The University of Minnesota Center for Infectious Disease Research and Policy (CIDRAP)
Links to the latest international news, academic journal articles, guidelines, and general information on pandemic flu.
http://www.cidrap.umn.edu/cidrap/content/influenza/panflu/index.html

Pandemic Influenza Resources
A list of links to PDFs of sample preparedness plans, exercises, and related other resources from the International Consortium for Organizational Resilience (ICOR).
http://www.theicor.org/pages/pandemic.html

Topic Collection: Influenza
The Government Accountability Office (GAO) lists the most recent GAO reports and testimonies related to influenza issued since October 2000.

National Vaccine Program Office
Describes how a pandemic starts, spreads, and its potential impact. Also presents a historical overview of pandemics that occurred throughout the past century (Spanish Flu, Asian Flu, Hong Kong Flu), and three influenza scares (Swine Flu, Russian Flu, and Avian Flu).
http://www.hhs.gov/nvpo/pandemics/

Business Preparedness
Pandemic Influenza Preparedness, Response and Recovery Guide for Critical Infrastructure and Key Resources

As part of the U.S. Government’s pandemic preparedness strategy, the Department of Homeland Security (DHS) supports the efforts of the public and private sector Critical Infrastructure and Key Resources (CI/KR) community and their businesses to develop and execute their essential pandemic contingency plans and preparedness actions. The Pandemic Influenza Preparedness, Response, and Recovery Guide is one of the practical tools DHS has developed for business owner-operators and their contingency planners to enhance pandemic planning.


Planning Checklists

These checklists are intended to aid preparation for a pandemic in a coordinated and consistent manner across all segments of society. Includes planning checklists for businesses, state and local government, individuals and families, schools, health care facilities, and communities.

http://www.pandemicflu.gov/plan/checklists.html

Business & Industry Planning

HHS and the Centers for Disease Control and Prevention have developed guidelines, including a checklist, to assist businesses in planning for a pandemic outbreak as well as for other comparable catastrophes.

http://www.pandemicflu.gov/plan/tab4.html

WHO Checklist for Influenza Pandemic Preparedness Planning

Checklists created to assist in preparing for a pandemic flu emergency, case investigation and treatment, preventing the spread of the disease, and maintaining essential services.


Pandemic Influenza Plan

A blueprint from the Department of Health and Human Services for pandemic influenza preparation and response. It provides guidance to national, state, and local policy makers and health departments. Includes an overview of the threat of pandemic influenza, a description of the relationship of this document to other
Federal plans and an outline of key roles and responsibilities during a pandemic. In addition, it specifies needs and opportunities to build robust preparedness for and response to pandemic influenza.
http://www.hhs.gov/pandemicflu/plan/

**Planning Tools**
This page from PandemicFlu.gov links to tools and programs to assist state and local agencies, workplaces, individuals, schools, communities, and health care providers to prepare for and respond to a pandemic flu crisis.
http://www.pandemicflu.gov/plan/tools.html

**State and Local Planning**

**Where You Live**
Select a state to view a page containing state pandemic planning information, federal funding assistance for states, links to state pandemic web site information, federal/state summit information and Memoranda of Understanding (MOUs), plus other related information.
http://www.pandemicflu.gov/usamap.html

**State Pandemic Plans**
Alphabetical state list with links to individual state pandemic plans.
http://www.pandemicflu.gov/plan/stateplans.html

**Preventing the Spread of Flu**

**Stopping the Spread of Germs at Work**
How to prevent the transmission of flu and cold germs usually spread from person to person when an infected person coughs or sneezes.
http://www.cdc.gov/germstopper/work.htm

**Guidance on Preparing Workplaces for an Influenza Pandemic**
The Occupational Safety and Health Administration (OSHA) developed this pandemic influenza planning guidance based upon traditional infection control and industrial hygiene practices. Employers and employees should use this planning guidance to help identify risk levels in workplace settings and appropriate control
measures that include good hygiene, cough etiquette, social distancing, the use of personal protective equipment, and staying home from work when ill.

For Healthcare Agencies

**Pandemic Influenza Preparedness and Response Guidance for Healthcare Workers and Healthcare Employers**
Collaboration with state and federal partners is vital to ensure that healthcare workers are adequately protected during an influenza pandemic. The goal of this document is to help healthcare workers and employers prepare for and respond to an influenza pandemic.

**Tabletop Exercise for Pandemic Influenza Preparedness in Local Public Health Agencies. David J. Dausey, Julia E. Aledort, Nicole Lurie. Rand Corporation, 2006.**
This manual presents a fully customizable template for a tabletop exercise for pandemic influenza preparedness that can be used by state and local health agencies and their healthcare and governmental partners as an exercise in training, in building relationships, and in evaluation.
http://www.rand.org/pubs/technical_reports/TR319/

**Infection Control in Health-Care Facilities**
A list of resources on preventing the spread of infection in health-care facilities.
http://www.cdc.gov/flu/professionals/infectioncontrol/

**Security Management Articles**
(Month, Year, Page)
Building Biothreat Defenses
2009, 58

A Deadly Serious Game (International)
Oct 2008, 44

Pandemic Threat- Nothing to Sneeze at (Editor's Note)
Sep 2008, 16

It's Time to Plan
2008, 66

Hard Questions in Emergency Critical Care (Homeland Security)
Aug 2008, 34

Scouting for Signs of Pandemic (Homeland Security)
Jan 2008, 24

WHO Is Preparing for the Inevitable Pandemic (International)
Dec 2007, 48

Can Your Business Withstand a Flu Pandemic? (Online Exclusive)
Nov 2007

Pandemic Resources for Business (Intelligence)
Nov 2007, 32

A Dose of Flu Preparedness (Intelligence)
Feb 2006, 20

Back issues of Security Management from certain months are available for purchase by contacting Customer Services at 703-519-6200. Please go to http://www.asisonline.org/library/secmancopies.xml for information on which back-issues are available, as well as how to obtain articles that are not available online.

ASIS Annual Seminar Session Recordings:

These sessions were recorded at past annual ASIS Seminars and are available for purchase in DVD and online format with audio and accompanying PowerPoint presentation. To purchase individual sessions, go to http://asisstore.confex.com/asisstore.

Influenza Pandemic: Handling Increased Demand With Reduced Forces (2008)

Session ID: S152

Participants: Alain Normand (speaker)

The world survived three major influenza pandemics in the last century, and science tells us another one is lurking. When it arrives, demand and
expectations with regard to security will increase. Quarantine orders, vaccine and antiviral stockpile protection, and reaction to fear will transform the world into temporary chaos. How will you cope when your security staff numbers are reduced by 35 to 50 percent? Find out how to begin preparing for the influenza pandemic from an expert in business continuity and security. Learn to assess the probable demand and your capacity to respond in times of disruption.

**Pandemic Influenza Planning and Response (2008)**
**Session ID:** S126
**Participants:** Michael J Fagel (speaker), Michael J Steinle (speaker), Frank Pisciotta (moderator), Michael R Bouchard, CPP (moderator)

This presentation focuses on three primary issues: 1) current pandemic planning standards of the World Health Organization and the U.S. Department of Health and Human Services; 2) planning considerations for continuity of operations relative to a pandemic; and 3) the importance of public and private sector interaction during a pandemic. These issues have security and sustainability implications premised on the resiliency of critical infrastructures including the agriculture and food industries. The presentation highlights critical planning criteria and builds on information gathered through a study in Vietnam commissioned by the Federal Bureau of Investigation for the International Symposium on Agroterrorism.

**Business Continuity Planning for an Avian Flu Pandemic (2007)**
**Session ID:** S40
**Participants:** David G Patterson, CPP (speaker), Howard J Belfor, CPP (moderator)

An influenza pandemic will cause major economic losses due to absenteeism. If a pandemic occurs, about 30% of the workforce could be off from work, due to either sickness or fear. Absentee levels at these rates will cause severe problems. The economic impact will be felt around the world, appearing in two primary aspects of business-the availability of the workforce and the impact in the market place. In addition, absence of purchases will present a new form of business impact currently not assessed in traditional business impact analysis or business continuity plans.

**Medical Risk Management for Security Professionals (2007)**
**Session ID:** S97
**Participants:** Jonathan Spero (speaker), Ernest G Vendrell, CPP (moderator)
Learn about medical risk management strategies for meetings and events around the globe. From the avian bird flu pandemic to bioterrorism, the health risks associated with meetings and travel have become much more challenging and significant over the past decade. Security personnel need a practical set of tools to prepare and respond to these real medical threats. Leave with a comprehensive checklist and the latest recommendations from a board certified physician with over 16 years of experience in the industry.

**Pandemic Preparedness: What Companies Need to Know (2006)**

**Session ID:** S140

**Participants:** Myles Druckman (speaker), Joseph E Krull, CPP (moderator)

The specter of avian influenza has raised the threat of a flu pandemic that could drastically impact organizations throughout the world. A pandemic could cause 30% of your workforce to become ill with absenteeism rates of 50% or more. A pandemic will not occur over days but may last for months and years and will affect every part of your organization. Is there anything practical that companies can do to protect their personnel and their operations? What are organizations planning today? Are there any best practices available?