

INJURY/ILLNESS PREVENTION PROGRAM



KAPTIVE C&P

KAPTIVE CONSTRUCTION & PRESERVATION

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Injury and Illness Prevention Program

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Kaptive Construction & Preservation INJURY & ILLNESS PREVENTION PROGRAM (IIPP)

Kaptive Construction & Preservation is committed to developing, implementing and observing a safe and healthy work environment for employees, management, contractors and visitors. A safe and healthy work environment is achieved through the cooperation and compliance of every employee with procedures and relevant work instructions. It is always the intention of the company's management to provide safe and healthy working conditions and to establish and insist upon safe work practices by employees. Compliance with federal and state safety regulations is considered Company's minimum standard.

Kaptive Construction & Preservation emphasizes the integration of health and safety measures into all job tasks so that incident prevention, health, quality and job performance become part of the management system. This will be accomplished through the cooperative efforts of managers, supervisors, and employees, working together as a team. Through a coordinated effort of continuously improving, a safe and healthy work environment is achieved.

Employees are expected to obey safety rules, follow established safe work practices and exercise caution in all their work activities. It is up to every manager, supervisor and employee to communicate and enforce all established safety rules, ensuring that procedures are followed and requirements for documentation are completed.

All employees are expected to report any unsafe conditions immediately to their supervisor. Employees at all levels of our organization are responsible for correcting unsafe conditions by utilizing proper hazard abatement methods.

The goal is to stimulate an interest in safety and health through promoting lifestyle changes that ultimately become part of the organizational culture.

By recognizing this as a cooperative effort and accepting mutual responsibility to operate safely, we expect the overall safe and well being of all our employees.

Dustin Thomas Coad

President (sign)

1. Responsibility

A. President

While everyone is responsible for safety and health in the workplace, overall responsibility for the safety program is with the president:

Some of these responsibilities include but are not limited to:

1. Assigning individual responsibility and accountability.
2. Review and evaluation of program results.
3. Allocating resources to the safety process.
4. Demonstrate active leadership in the IIP Program through participation and example.
5. Implement and maintain the IIP Program within the facility.
6. Sets company policy.
7. Employee understands how to complete each task to which they are assigned in a safe manner.
8. Make sure that machines and equipment are maintained in safe operating condition.
9. Make sure that employees follow all safety and health regulations and work practices, including using required personal protective equipment.
10. Investigate Incidents that occur and identify the corrective action necessary to prevent a similar Incident from occurring.
11. Take an active role in participating with the safety process.
12. Comply with company mandated safety programs.
13. Support a strong safety culture within the company.

B. Safety Program Coordinator/Responsible Person: Dustin Thomas Coad

The company Safety Program Coordinator is responsible for:

1. Monitoring compliance with company safety and health standards based on Company policy, *Federal OSHA, Cal/OSHA, AQMD*, State and Federal laws and the regulations and the safety requirements of our customers.
2. Investigating recognized unsafe working conditions or potential hazards and immediately correcting or eliminating hazards as they are identified.
3. Notifying KAPTIVE CONSTRUCTION & PRESERVATION's Management and your Safety/Risk Consultant of any business contact with OSHA or Cal/OSHA agencies about KAPTIVE CONSTRUCTION & PRESERVATION's business operations.
4. Implementing an ongoing safety training program for all employees. Promoting and supporting on-going safety training activities for employees.

5. Implementing and monitoring Kaptive Construction & Preservation Drug & Alcohol Program for post injury testing. Follow Cal-Osha recommendation for immediate drug testing for post mishaps.
6. Posting all legal notices and maintaining safety records as required by Federal and State agencies.
7. Responding to all serious Incidents to insure the employee or others who may have been involved receive proper care.
8. Investigating incidents and injuries to determine if any additional training programs or engineering controls are necessary to prevent a recurrence. The Safety Program Coordinator is also responsible for ensuring that management recommendations are forwarded to the company principals (senior management) and the Safety/Risk Consultant, for review and closure.
9. Notifying Kaptive Construction & Preservation senior management personnel so they can begin immediate incident investigation of all substantial incidents.
10. Ensuring that employees are aware of their responsibilities relative to the Injury/Illness Prevention Program. This information will be communicated relative to the specific job description, training and OSHA compliance issues appropriate for the job function.

C. Employees

1. Observe all company safety and health rules and apply the principles of Incident prevention in day-to-day duties.
2. Report any job-related injury, illness or property damage to my supervisor and promptly seek medical treatment if needed.
3. Report hazardous conditions (unsafe equipment, floors, material, etc.) and unsafe acts promptly to my supervisor or the safety coordinator.
4. Actively support and participate in KAPTIVE CONSTRUCTION & PRESERVATION's efforts to provide a safety and health program.
5. Complete the Employee Responsibility form.

2. Compliance

Kaptive Construction & Preservation considers the safety of our employees to be of up-most importance. Therefore, to prevent incidents that result in injury relating from unsafe acts, it is our policy to strictly enforce company safety rules. Violation/infractions of safety rules or disregard of any of the safety rules are enough grounds for disciplinary action, ranging from a verbal warning to discharge, depending on the seriousness of the violation. The normal progression of safety rules infractions will result in the following:

- a) 1st infraction – Verbal Warning
- b) 2nd infraction – Written Warning
- c) 3rd infraction – 3-day suspension
- d) 4th infraction – Termination

Employees creating a significant safety violation that is likely to cause serious injury or death will result in immediate termination.

Management is responsible to ensure that all safety and health policies are clearly communicated and understood by all workers. Managers are expected to enforce the rules fairly and uniformly. All workers are responsible to use safe work practices, to follow directions, policies and procedures to assist in maintaining a safe work environment. Safety training for new employees will be implemented and safety rules established based on the IIP Program and Code of Safe Work Practices.

Employees assigned to a new or unfamiliar task will receive additional training.

The Safety Coordinator will conduct periodic work area safety inspections. During this process, he/she will document performance issues and complete a safety inspection report.

3. Reporting and Communication

Maintaining open communication between management, staff and hourly employees is an essential part of our safety program. The following reporting procedures and disseminating safety information has been developed to assure a continuous flow of safety and health information between management and staff.

- A. Employees are encouraged to utilize the chain of command when identifying company hazards. Contact with your immediate supervisor is recommended first.
- B. All valid safety issues/concerns will be addressed by senior management who will then ensure that all corrective actions taken will be made public without regard to the person submitting the form, in any manner deemed appropriate by management.

All employees will go through a new hire orientation process and receive training on safety and health policies, practices, and/or procedures. At our discretion we may utilize industry or trade specific training videos to emphasize certain aspects of training.

All Kaptive Construction & Preservation employees will receive the Employee Safety Handbook during their new-hire process.

The Injury Illness Prevention Program (IIPP) and Kaptive Construction & Preservation safety rules will be periodically reviewed with employees.

- A. Employees are responsible for reporting unsafe conditions which are identified to the work area manager.
- B. Any serious safety issue or job site condition which relates to overall health and safety must be reported to the Safety Coordinator immediately. This allows proper follow-up to ensure that appropriate corrective action is taken and may help identify any additional training that may be required for affected employees.
- C. Employees are encouraged to report unsafe conditions and there will be no reprisal for reporting safety issues.
- D. Our methods of communication include, but are not limited to the following:
 - 1) Signs and posted notices of safety information
 - 2) Quarterly scheduled safety and training meetings
 - 3) Written training materials and handouts.
 - 4) Written and or verbal instruction from management, the Safety Coordinator, and or Safety/Risk Consultant.

E. The following safety topics are addressed in the Kaptive Construction & Preservation Safety Manual and/or specialized training will be provided by the company or outside consultants:

- 1) First-aid
- 2) Hazard Communication
- 3) Ergonomics
- 4) Personal Protective Equipment (PPE)
- 5) IIPP
- 6) Defensive Driving (if applicable)
- 7) Respirator Training (if applicable)
- 8) Blood Borne Pathogens

4. Return to Work Policy (Modified Work Program)

Kaptive Construction & Preservation supports and employs a policy of modified work for an employee legally injured on the job. Our modified work program utilizes an employee in a capacity based upon their medical restrictions for a limited period (no longer than 180 days) in accordance with a Primary Licensed Health Care Practitioner's (PLHCP) or physician's written medical restrictions. This allows an employee to recover from a workplace injury that prohibits them from performing their usual and customary work.

The status of an injured worker will be evaluated by a (PLHCP) or physician on a case by case basis. Kaptive Construction & Preservation supports and approves all levels of modified duty.

5. Hazard Identification, Assessment & Abatement Process

A. Identifying and evaluating potential workplace hazards will be performed utilizing a simple hazard assessment process. The hazard assessment tool is to evaluate offices, field and production operations. Hazard Assessment Procedures will be performed when:

- 1) A new task, operation or location is introduced for the first time.
- 2) New products, processes, procedures or equipment which present a potential hazard are introduced into the workplace.
- 3) New, previously unidentified hazards are identified.
- 4) An occupational injury or illness occurs.
- 5) Workplace conditions warrant an inspection.

Potential hazards on the job are identified in a checklist provided to management.

Jobs which represent a potential hazard which may require additional engineering controls or extraordinary safety measures should be reviewed with Kaptive Construction & Preservation Management and the Safety/Risk Consultant.

Quarterly inspections of the facility or job site will be conducted by; the Safety Coordinator and may include a Risk Consultant. A written report may be generated which documents the observation/findings.

Unsafe or unhealthy work conditions, practices or procedures which present a serious hazard will be corrected immediately. Other safety matters will be prioritized based upon the assessment. Immediate correction is the best practice and if a condition presents a threat of serious injury or exposure, the job shall be shut down until all necessary corrections have been made to eliminate/reduce the hazard to an acceptable risk level. Hazards shall be corrected according to established procedures.

B. Hazard Identification & Abatement Procedures

- 1) Hazardous conditions will be eliminated from the work site immediately whenever possible.
- 2) Hazards caused by conditions beyond employee control may result in a task being shut down.
- 3) Remove, replace, lock or tag damaged or defective equipment.
- 4) Shutdown the specific operation until conditions change or corrections can be made when a serious hazard is determined to be present.

- 5) Suspend operations until additional safety equipment is made available in order to correct or protect from a workplace hazard.
- 6) Failure to correct known hazards will result in appropriate disciplinary action. Disciplinary action applies to all company and subcontracted employees.

C. Responsibility for Hazard Correction and Abatement

Every employee is responsible for identifying and correcting workplace hazards when they can do so, or they must notify management at once.

1. The safety coordinator is responsible for identifying, documenting, and correcting hazards they find during their Quarterly inspections.

COVID-19

To ensure the safety our employees the follow procedures are in place to prevent the COVID-19 illness.

- A. Training will be provided in a language readily understood by all employees.
- B. General description of COVID-19, symptoms, when to seek medical attention, how to prevent its spread and the employer's procedures for preventing its spread at the workplace are posted in the branch.
- C. How an infected person can spread COVID-19 to others even if they are not sick.
- D. How to prevent the spread of COVID-19:
- E. CDC guidelines that everyone should use cloth face covers when around other persons.
- F. How cloth face covers can help protect persons around the user when combined with physical distancing and frequent handwashing.
- G. Information that cloth face covers are not protective equipment and don't protect the person wearing a cloth face cover from COVID-19.
- H. Instructions on washing and sanitizing hands before and after using face coverings, which should be washed after each shift.
- I. Cough and sneeze etiquette.
- J. Washing hands with soap and water for at least 20 seconds, after interacting with other persons and after contacting shared surfaces or objects.
- K. Avoiding touching eyes, nose and mouth with unwashed hands.
- L. Avoiding sharing personal items with coworkers (i.e., dishes, cups, utensils, towels).
- M. Providing tissues, no-touch disposal trash cans and hand sanitizer for use by employees.
- N. Safely using cleaners and disinfectants, which includes:
 - O. The hazards of the cleaners and disinfectants used at the worksite.
 - P. Wearing personal protective equipment (PPE)
 - Q. Ensuring cleaners and disinfectants are used in a manner that does not endanger employees.

6. Incident Investigation

Our policy is to investigate all incidents, injuries, exposures and near misses in order to better protect our employees and to prevent a recurrence. Procedures for investigating workplace incidents, injuries and exposures are as follows:

- 1) The reporting supervisor will notify the main office immediately.
- 2) The reporting supervisor will investigate the incident and complete the Supervisor's Incident Report. Additionally, the supervisor will ensure the employee and witness statements are completed.
- 3) The reporting manager will get the employee to complete their information if appropriate at the time the injury occurs unless it is an immediate emergency, if so, the employee information will be obtained later.
- 4) Kaptive Construction & Preservation office will **immediately** notify/report the injury to the main office as applicable.
- 5) Kaptive Construction & Preservation will **immediately** forward the completed injury forms to the Workers Comp provider's office unless instructed otherwise.
- 6) Employees are responsible for reporting all incidents, injuries and workplace exposures **immediately**, regardless of the severity.

Failure to report a work-related incident is cause for disciplinary action based upon our progressive disciplinary policy and guidelines.

Incidents resulting in death, injury requiring a hospital stay and serious incidents involving multiple employees must be reported to the Senior Management and the Safety Coordinator. It is the responsibility of Kaptive Construction & Preservation to contact OSHA as soon as all the relevant facts are established, but no later than the 8-hour reporting requirement.

1. The Kaptive Construction & Preservation Safety Coordinator and the Risk Consultant will visit the scene of a serious incident as soon as possible to conduct an incident investigation.
2. If disciplinary action is indicated, it will be accomplished in compliance with established disciplinary procedures and in consultation with Kaptive Construction & Preservation Management.
3. Findings and procedures will be documented, and records maintained for the established periods of time as previously indicated.

4. A copy of any incident report generated by an outside agency such as; the Fire Department, Cal OSHA, AQMD, etc., will be maintained on file and forwarded to the Worker's Comp office.

7. Training and Instruction

All workers, including managers, shall have training and instruction on general and job-specific safety and health work practices.

Training and instruction shall be provided as follows:

- 1) When the IIP Program is first established.
- 2) To all new workers and contracted employees via the new hire orientation process.
- 3) To all workers given a new job assignment for which training has not been previously provided.
- 4) Whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard.
- 5) Whenever the employer is made aware of a new or previously unrecognized hazard.
- 6) For management to familiarize themselves with the safety and health hazards to which workers under their immediate direction and control may be exposed.
- 7) To all workers with respect to hazards specific to each worker's job assignment.
- 8) Safety and health training practices for all classes of work shall include, but are not be limited to the following:
 - a. Explanation of the Kaptive Construction & Preservation Program and Emergency Action Plan, and means for reporting any unsafe conditions, work practices and injuries.
 - b. Use of appropriate clothing, including gloves, footwear, eye protection, and other personal protective equipment (PPE).
 - c. Information about chemical hazards to which workers could be exposed and other hazard communication program information.
 - d. Provisions for medical services, first aid, and emergency procedures.
 - e. Specific training for the unique hazards of a job assignment will be provided to the extent that it is not already covered in other training processes.

8. Recordkeeping

There are specific recordkeeping requirements which we are obligated to meet in order to fulfill the requirements of this Injury/Illness Prevention Program (IIPP).

Safety Work Orders have many specific guidelines for recordkeeping.

Many of the safety orders provide specific timelines for the maintenance and records retention.

Records Retention:

- 1) Training documents are to be *filed separately from personnel files* and set up for each current employee to be maintained **during his/her employment.**
- 2) Unsafe conditions and work practices and corrective action taken will be kept for at least **two years.**
- 3) Incident investigation reports will be kept on file for at least **three years.**
- 4) OSHA 300 log will be maintained by senior management and on file in a centralized office for at least **five years.** The 300 logs must be maintained current by the employer within five (5) days of experiencing or receiving notification of a recordable incident.
- 5) Written reports and any other safety related training materials will be kept on file for not less than **three years.**
- 6) Employee exposure records must be retained for **30 years** plus the length of employment.
- 7) MSDS/SDS are retained for **30 years.**

Kaptive Construction & Preservation retains the right to update, modify, or change this document at will, in order to comply with Federal and State agency requirements.

When changes occur, they will be communicated to employees in one of the following ways;

- 1) By posting the changes on bulletin boards
- 2) Covered at Quarterly safety meetings
- 3) Or, have management covered during Quarterly staff meeting.