



INJURY AND ILLNESS PREVENTION PROGRAM

RESPONSIBILITY

1. The Injury and Illness Prevention Program (IIPP) Administrator, Kait Van Auker has the authority and responsibility for implementing the provisions of this program.
2. The Transportation Safety & Compliance Specialist, Gregory Taylor has responsibility for the Safety training design and implementation for both new hires and current drivers, and the development of a Job Hazard Analysis Program.
3. The Engineering and Bulk Divisions are responsible to administer, maintain, and audit the Safety Data Sheet (SDS)/Hazcom Program – both in a hard copy binder and electronic format, for all Lubricants, Fuels, Oils, cleaning products, & other Bulk Plant/Transport/Office materials.
4. The Transportation Administration team, including the Supervisors, Managers, Director and COO, Ken Dwelle, are responsible to develop, maintain, audit and ensure DOT/HazMat Security Plan Compliance.
5. The Engineering Compliance Administrator, Anais Maurel is responsible to maintain the Hazardous Material Permit Program (onsite/warehousing/storing permitting) by location.
6. Supervisors, Managers, Risk & Compliance Specialist - Brenda Gillum and HR Generalist – Kait Van Auker are responsible for Workers Compensation accident/injury response, investigation, claims & administration
7. HR Risk & Compliance Specialist, Brenda Gillum is responsible for OSHA Recordkeeping (OSHA), and WC & General liability insurance, renewals, rates, etc.
8. HR Generalist Kait Van Auker is responsible for OSHA posting and communications, including accident/injury reporting.
9. Risk & Compliance Specialist, Brenda Gillum is responsible for internal communications regarding Safety Team meetings, Program developments, recognition.
10. TMs, Manager/Supervisors, HR, and Environmental Compliance are responsible for total Accident/Incident/Injury Response and Investigation.
11. The Environmental Compliance group, including Amanda Appelt and Anais Maurel, are responsible for Environmental Compliance (EPA) reporting, response, and risk mitigation, with cooperation and support from Executives/Manager/Supervisors.
12. The HR Manager, Cienna Williams is responsible for Chairing the Safety Team to coordinate Program Development, IIPP maintenance and review, and action items.
13. All managers, supervisors and lead TMs are responsible for implementing and maintaining the IIPP in their work areas and for answering questions about the program. A copy of this IIPP is available on the Flyers Intranet, under Team Member Resources and maintained by Human Resources. An electronic copy is also available to drivers and remote TMs on company provided devices.



COMPLIANCE

All TMs are responsible for using safe work practices, for following all directives, policies and procedures, and for assisting in maintaining a safe work environment. Flyers takes Safety and Compliance very seriously, with no tolerance for negligence or failure to adhere to company safety programs or policies.

Every TM is expected to know, understand and comply with the procedures outlined within the IIPP and on Flyers' Safety Program and Plan documents distributed. TMs are encouraged to ask questions about programs they do not understand, stay refreshed on program updates, and report unsafe practices, policies and programs or any lack of policies or programs, which they identify.

Senior Management, Managers and Supervisors are responsible for ensuring that all safety and health policies and procedures are clearly communicated and understood by all TMs. Supervisors and lead personnel are expected to enforce the rules fairly and uniformly. Managers and Senior Management are expected to evaluate Safety Programs and the application of such programs for effectiveness.

The following is our system of ensuring that all TMs comply with the General Safety Rules & Code of Safe Practices, and to maintain a safe work environment:

- Informing TMs of the provisions of our IIPP;
- Informing TMs of where they can access programs and policies.
- Evaluating the safety performance of all TMs;
- Recognizing TMs who perform safe and healthful work practices. This recognition is accomplished by: Safety Tokens Program, Safe Driver Recognition Program, Safety Swag giveaways, etc.
- Providing training to workers whose safety performance is deficient;
- Disciplining workers for failure to comply with safe and healthful work practices. The following outlines our disciplinary process:
 - Manager will:
 - Get an initial understanding of the incident that took place
 - Investigate thoroughly with cooperation from all parties responsible for investigation
 - Invite the TM to a disciplinary discussion conducted by the Manager
 - Coordinate with HR to decide on the appropriate disciplinary action
 - Document the disciplinary action in writing with TM present.
 - Disciplinary action will vary depending on:
 - severity of the incident,
 - depth and recency of training provided prior to the incident
 - any unsafe practices or negligence identified during investigation
 - Prior instances of disciplinary action or safety infractions
 - Former verbal warnings, near misses, or failures to comply with programs or policies
 - DOT or non-DOT compliance related
 - Costs incurred
- Other means that we use to ensure employee compliance with safe and healthful work practices include: internal audits, ride-along evaluations, risk compliance assessments, and TM feedback.



COMMUNICATION

Our system of communication is designed to facilitate a continuous flow of two-way (management, supervision and TMs) safety and health information in a format that is readily available and easy to understand.

- New TM orientation during the first 90 days, including a discussion of site-specific safety and health policies and procedures.
- Hands-on new hire training and assessments with qualified trainers.
- Follow-through by supervision to ensure effectiveness.
- Workplace-specific safety and health training.
- Safety Team meetings held at least every quarter – more frequently as deemed necessary by the creation of hazards or occurrence of injuries and illnesses. Safety Team will be comprised of HR, Environmental Compliance, Transportation, Bulk Plant Operations.
- Effective written communication of safety and health concerns between TMs and supervisors, including language translation where appropriate.
- Safety News delivered through the Flyers Frontline Magazine and through Monthly Community Meetings.
- Printed programs, announcements, and resources posted to TM communications boards at each location and distributed via email, interoffice mail and postal mail.
- Safety Tailgates, recurring and focusing on hot topics, training and trends.
- A system for TM to anonymously inform management about workplace hazards without fear of reprisal. This is accommodated by: HR Intranet > Anonymous Hazard Report or on TM devices in vehicle.

HAZARD ASSESSMENT

Periodic inspections to identify and evaluate workplace hazards shall be performed by the Transportation Safety & Compliance Specialist, Engineering, and Bulk Plant Managers, according to the following schedule:

- Upon New Hire
- Forklift & Vehicle Inspections – daily; pre-post trips; upon repair/maintenance.
- Monthly Inspections of Site (Bulk Plants & Offices)
- Quarterly Transport Driver evaluations, ride-along's and interviews
- When our Injury and Illness Prevention Program was first established
- When new substances, processes, procedures or equipment that present potential new hazards are introduced into our workplace;
- When new, previously unidentified hazards are recognized;
- When occupational injuries and illnesses occur;
- When we hire and/or reassign permanent or intermittent TMs to processes, operations, or tasks for which a hazard evaluation has not been previously conducted; and
- Whenever workplace conditions or TM feedback warrants an inspection.
- Safety & Risk Compliance Assessment – Annual
- Periodic inspections consist of identification and evaluation of workplace hazards utilizing the posted How do I Identify a Hazard checklist, and any other effective methods.

ACCIDENT/EXPOSURE INVESTIGATIONS

Investigation of workplace accidents, hazardous substance exposures and near-accidents will be



done by the injured/affected TM, the direct Supervisor/Manager and if applicable Risk & Environmental Compliance and/or HR. The investigation will include:

- Completing an Accident/Injury package (termed the “Red Folder”), which is available to all TMs to begin the Accident Reporting & Investigation process.
- Visiting the scene if and as soon as possible or obtaining detailed photographs of the incident scene
- Interviewing affected TMs and witnesses;
- Examining the workplace for factors associated with the accident/exposure/near-accident;
- Determining the causes of the accident/exposure/near-accident;
- Taking corrective action to prevent the accident/exposure/near-accident from reoccurring; and
- Recording the findings and corrective actions taken on the OSHA Form 301 and in our Safety Dashboard.

HAZARD CORRECTION

Unsafe or unhealthy work conditions, practices or procedures at our work facilities shall be corrected **in a timely manner** based on the severity of the hazards, and according to the following procedures:

- When observed or discovered, Manager will be notified immediately;
- When an imminent hazard exists which cannot be immediately abated without endangering TM(s) and/or property, we will remove all exposed TMs from the area except those necessary to correct the existing condition. TMs necessary to correct the hazardous condition shall be provided with the necessary protection; and
- All such actions taken and dates they are completed shall be documented on the related Help Desk Tickets.
- For hazards which can be immediately isolated or temporarily abated to eliminate exposure, or for non-emergency hazard corrections, a Help Desk ticket may be created and track corrections and timeline, include notes for corrections.
- Safety Suggestion – corrections – safety team incident spreadsheet with at fault corrections

TRAINING AND INSTRUCTION

All TMs, including management, supervisors, and lead personnel shall have training and instruction on general and job-specific safety and health practices. Training and instruction shall be provided as follows:

- When the IIPP is first established;
- To all New Hire TMs
- To all TMs given new job assignments for which training has not previously provided;
- Whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard;
- Whenever we become aware of a new or previously unrecognized hazard;
- Team Safety Huddles which take place on a recurring and as-needed basis
- Quarterly Driver Safety Huddles
- To supervisors to familiarize them with the safety and health hazards to which TM under their immediate direction & supervision may be exposed; and
- To all TMs with respect to hazards specific to each individual’s job assignment.
- Upon forklift certification/re-certification Jim Goforth



This training will include (but is no limited to):

- Explanation of our IIPP, emergency action plan and fire prevention plan, and measures for reporting any unsafe conditions, work practices, injuries and when additional instruction is needed.
- Availability of toilet, hand-washing, and drinking water facilities
- Provisions for medical services and first aid, including emergency procedures (supplies must be stocked, logged and inspected).
- Proper housekeeping, such as keeping stairways and isles clear, work areas neat and orderly, and promptly cleaning up spills
- Prohibiting smoking, horseplay, scuffling, unauthorized vehicle sharing, or other acts that adversely influence safety.
- Proper lifting, moving, and storage and to prevent:
 - stacking goods in an unstable manner
 - storing materials and good against doors, exits, fir extinguishing equipment and electrical panels.
 - Lifting injuries and slips, trips or falls

Where applicable our training may also include:

- Prevention of musculoskeletal disorders, including proper lifting techniques
- Use of appropriate clothing, including gloves, footwear, and personal protective equipment (PPE)
- Required Safety Compliance certifications depending on job duties and role
- SDS information about chemical hazards to which employees could be exposed and other hazard communication program information.
- Proper food and beverage storage to prevent them from becoming contaminated
- Proper sanitation protocols to prevent the spread of infectious diseases

In addition, *we provide specific instructions to all workers regarding hazards unique to their job assignment, to the extent that such information was not already covered in other training.*

RECORDKEEPING

Flyers has taken the following steps to implement and maintain our IIPP, and to keep records as follows:

1. Records of ***scheduled and periodic inspections*** including the person(s) conducting the inspection, the workplace hazards (i.e., unsafe conditions/work practices) and the action(s) taken to correct the identified unsafe conditions and work practices. These records are recorded in Engineering help tickets, Hazard reporting submissions, and documented site inspection checklists, and are maintained for 3 years or for the duration of their employment, whichever is less.
2. Documentation of ***IIPP training***, and additional safety and health training for each worker, including the worker's name or other identifier, training dates, type(s) of training, and training providers are recorded on the HRIS System, Driver Safety Training logs and/or in personnel files. This documentation is maintained for 1 year or for the duration of their employment, whichever is less.
3. All federal and state required OSHA recordkeeping including incident details and responses to reportable incidents, as well as near misses and property/spill related incidents and claims. *Records of periodic safety inspections are kept for 3-years. 1-year of retention for safety training is kept.*