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Employee & Safety Handbook



GRAHAM ROOFING INCORPORATED EMPLOYEE HANDBOOK

(January 2017)

Employee Handbook Acknowledgment and Receipt

I have received my copy of the Employee Handbook.

The employee handbook describes important information about Graham Roofing, and I understand that I should consult my supervisor or manager or Human Resources regarding any questions not answered in the handbook. I have entered into my employment relationship with Graham Roofing voluntarily and acknowledge that there is no specified length of employment. **Accordingly, either I or Graham Roofing can terminate the relationship at-will, with or without cause, at any time, so long as there is no violation of applicable federal or state laws.**

I understand and agree that, other than the company president, no manager, supervisor or representative of Graham Roofing has any authority to enter into any agreement for employment other than at-will; only the president of the company has the authority to make any such agreement and then only in writing signed by the president of Graham Roofing.

This handbook and the policies and procedures contained herein supersede any and all prior practices, oral or written representations, or statements regarding the terms and conditions of my employment with Graham Roofing. By distributing this handbook, the company expressly revokes any and all previous policies and procedures that are inconsistent with those contained herein.

I understand that, except for employment at-will status, any and all policies and practices may be changed at any time by Graham Roofing, and the company reserves the right to change my hours, wages and working conditions at any time. All such changes will be communicated through official notices, and I understand that revised information may supersede, modify or eliminate existing policies. Only the president of Graham Roofing has the ability to adopt any revisions to the policies in this handbook.

I understand and agree that nothing in the Employee Handbook creates, or is intended to create, a promise or representation of continued employment and that employment at Graham Roofing is employment at-will, which may be terminated at the will of either Graham Roofing or myself. Furthermore, I acknowledge that this handbook is neither a contract of employment nor a legal document. I understand and agree that employment and compensation may be terminated with or without cause and with or without notice at any time by Graham Roofing or myself.

I have received the handbook, and I understand that it is my responsibility to read and comply with the policies contained in this handbook and any revisions made to it.

Employee's Signature

Employee's Name (Print)

Date

TO BE PLACED IN EMPLOYEE'S PERSONNEL FILE

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Introduction and Welcome

Welcome to Graham Roofing. The success of this company depends on how well each employee "carries his load" and adds to the team effort in increasing the business of the company. Employees are hired at Graham Roofing on a **three (3) month probationary and trial basis**. One of the major factors in your future with the company is your ability to set your own personal goals of attainment. We therefore urge you to show an interest in the company that will not only be a credit to our operations, but will give you the benefits and sense of satisfaction that come from a job well done.

The company has regulations and policies that are necessary to promote the smooth operations of the business as a whole. Rather than restricting employees, they assure fairness and safety to one and all through cooperative effort.

Purpose of Handbook

This handbook is intended for informational purposes only. This handbook, company practices, and other communications do not create an employment contract or term. It does not contain all of the information you will need during the course of your employment. You will receive information through various notices as well as orally. It is obviously not possible to anticipate every situation that may arise in the workplace or to provide information that answers every possible question. In addition, circumstances will undoubtedly require that policies, practices and benefits described in this handbook change from time to time. Accordingly, the company reserves the right to modify, supplement, rescind or revise any provision of this handbook from time to time as it deems necessary or appropriate in its sole discretion. Employees will be notified of such changes as they occur.

Management is committed to reviewing its policies and benefits continually. Accordingly, the policies and benefits outlined in this handbook are subject to review and change by management at any time. No communication or practice limits the reasons or procedures for termination or modification of the employment relationship.

Equal Employment Opportunity Statement

Graham Roofing provides equal employment opportunities (EEO) to all employees and applicants for employment without regard to race, color, religion, gender, sexual orientation, gender identity, national origin, age, disability, genetic information, marital status, amnesty or status as a covered veteran in accordance with applicable federal, state and local laws. Graham Roofing complies with applicable state and local laws governing nondiscrimination in employment in every location in which the company has facilities. This policy applies to all terms and conditions of employment, including hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation and training.

Graham Roofing expressly prohibits any form of unlawful employee harassment based on race, color, religion, gender, sexual orientation, national origin, age, genetic information, disability or

veteran status. Improper interference with the ability of Graham Roofing employees to perform their expected job duties is absolutely not tolerated.

Anti-harassment Policy and Complaint Procedure

Graham Roofing is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including harassment. Therefore, Graham Roofing expects that all relationships among persons in the company will be business-like and free of bias, prejudice and harassment.

It is the policy of Graham Roofing to ensure equal employment opportunity without discrimination or harassment on the basis of race, color, religion, gender, sexual orientation, gender identity, national origin, age, disability, genetic information, marital status, amnesty or status as a covered veteran. Graham Roofing prohibits any such discrimination or harassment.

Graham Roofing encourages reporting of all perceived incidents of discrimination or harassment. It is the policy of Graham Roofing to promptly and thoroughly investigate such reports. Graham Roofing prohibits retaliation against any individual who reports discrimination or harassment or who participates in an investigation of such reports.

Complaint Process

Individuals who believe they have been the victims of conduct prohibited by this policy statement or who believe they have witnessed such conduct should discuss their concerns with their immediate supervisor or a member of the Management Advisory Team.

Policy Against Sexual Harassment

Unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature constitutes sexual harassment when:

- (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment,
- (2) submission to or a rejection of such conduct by an individual is used as the basis for employment decisions affecting such individuals, or
- (3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

It is the policy of Graham Roofing to maintain a work environment that is free from the hostile atmosphere created by sexual harassment or intimidation. Such conduct will not be tolerated. If you believe you have been subjected to sexually harassing or intimidating conduct by any individual, including supervisory personnel, employed by Graham Roofing, you should immediately report the incident to your supervisor or a member of the Management Advisory Team. Such charges will be promptly investigated and if substantiated, the offending individual will be appropriately disciplined. To the extent possible, all persons involved in a complaint of sexual harassment will be given the utmost protection of privacy. Persons complaining of sexual harassment will also be protected from reprisals and retaliation by coworkers as a result of such complaints.

Americans with Disabilities Act (ADA) and the ADA Amendments Act (ADAAA)

It is the policy of Graham Roofing to comply with all federal and state laws concerning the employment of persons with disabilities and to act in accordance with regulations and guidance issued by the Equal Employment Opportunity Commission (EEOC). Furthermore, it is our company policy not to discriminate against qualified individuals with disabilities in regard to application procedures, hiring, advancement, discharge, compensation, training or other terms, conditions and privileges of employment.

The company will reasonably accommodate qualified individuals with a disability so that they can perform the essential functions of a job unless doing so causes a direct threat to these individuals or others in the workplace and the threat cannot be eliminated by reasonable accommodation and/or if the accommodation creates an undue hardship to Graham Roofing. Contact a member of the Management Advisory Team with any questions or requests for accommodation.

Complaint Process

Individuals who believe they have been the victims of conduct prohibited by this policy statement or who believe they have witnessed such conduct should discuss their concerns with their immediate supervisor or a member of the Management Advisory Team.

EMPLOYMENT

Open Door Policy

Graham Roofing is committed to treating its employees with respect and dignity and to providing them with excellent benefits, optimum working conditions and competitive wages. We understand that at times employees have concerns and suggestions for improvements. The company encourages its employees to speak up and take advantage of the open-door policy its managers follow. The company listens to its employees and take their comments seriously. The direct personal relationship between Graham Roofing employees and their managers ensures the best environment for achievement of individual and company goals.

In order to resolve any problems or difficulties as quickly and fairly as possible, the first person to consult in the event of a complaint or concern is your immediate supervisor. Afterward, if necessary, your complaint will be handled by management. Your wellbeing is very important to the company. Any employee who believes that the company is violating some law, rule or regulation must inform his immediate supervisor in writing with specific details.

Employee Classification Categories

All employees are designated as either nonexempt or exempt under state and federal wage and hour laws. The following is intended to help employees understand employment classifications and employees' employment status and benefit eligibility. These classifications do not guarantee employment for any specified period of time. The right to terminate the employment at-will relationship at any time is retained by both the employee and Graham Roofing.

- **Nonexempt employees** are employees whose work is covered by the Fair Labor Standards Act (FLSA). They are NOT exempt from the law's requirements concerning minimum wage and overtime.
- **Exempt employees** are generally managers or professional, administrative or technical staff who ARE exempt from the minimum wage and overtime provisions of the FLSA. Exempt employees hold jobs that meet the standards and criteria established under the FLSA by the U.S. Department of Labor.

Graham Roofing has established the following categories for both nonexempt and exempt employees:

- **Regular, full time:** Employees who are not in a temporary status and who are regularly scheduled to work the company's full-time schedule of 37.5 hours per week. Generally, these employees are eligible for the full benefits package, subject to the terms, conditions and limitations of each benefits program.
- **Regular, part time:** Employees who are not in a temporary status and who are regularly scheduled to work less than the full-time schedule but at least 20 hours each week. Regular, part-time employees are eligible for some of the benefits offered by the company subject to the terms, conditions and limitations of each benefits program.

Background and Reference Checks

To ensure that individuals who join Graham Roofing are well qualified and to ensure that Graham Roofing maintains a safe and productive work environment, it is our policy to conduct pre-employment background checks. Background checks may include verification of any information on the applicant's resume or application form.

All offers of employment are conditioned on receipt of a background check report that is acceptable to Graham Roofing. All background checks are conducted in conformity with the Federal Fair Credit Reporting Act, the Americans with Disabilities Act, and state and federal privacy and antidiscrimination laws. Reports are kept confidential and are only viewed by individuals involved in the hiring process.

If information obtained in a background check would lead Graham Roofing to deny employment, a copy of the report will be provided to the applicant, and the applicant will have the opportunity to dispute the report's accuracy. Background checks may include a criminal record check, although a criminal conviction does not automatically bar an applicant from employment.

Additional checks such as a driving record or credit report may be made on applicants for particular job categories if appropriate and job related.

Graham Roofing also reserves the right to conduct a background check for current employees to determine eligibility for promotion or reassignment in the same manner as described above.

Pay Policies

- Employees are paid each Friday for the preceding week's work. The workweek runs from Monday through Friday.
- Payroll checks are given out after work on Friday.
- **THE COMPANY DOES NOT LEND MONEY OR MAKE ADVANCES.**
- Federal and state deductions from your paycheck will automatically be made for withholding (income) tax and social security. Except for legal garnishment (which is addressed below), no other deductions will be made without written authorization by you. Examples of deductions that may be authorized by you are insurance, 401K, credit union loans and United Way.
- If the company is garnished for a judgment against an employee, under the current Mississippi law, that employee has thirty (30) days from the date of service of the Writ of Garnishment from the company to make arrangements for payment of the judgment unless otherwise dictated by law. If no arrangements have been made within that thirty (30) day period, then the company will begin withholding from each paycheck the legal amount required.
- After sixty (60) days of continuous employment, full-time employees are eligible for company group health-hospitalization insurance on a payroll deduction plan on the first of the month following the 60 days. Graham Roofing will pay a portion of the premium of this coverage in an amount to be determined by the Management Advisory Team. Please contact Misty McCraw in the West Point office (662/492-9555) for more information if you are interested.
- Terminated employees' checks are issued at 4:00 p.m. on the Friday after their termination unless otherwise specified. All uniforms, tools, and other charges must be cleared before the check will be given to the employee.

Advancement

After one (1) year of continuous employment, fulltime employees may be considered for advancement on the anniversary date of their employment (hire date). At that time, every employee will be evaluated according to the factors listed below;

1. Effort
2. Attitude and personality
3. Cooperativeness
4. Willingness to learn and to take the initiative
5. Teamwork
6. Ability and judgment
7. Skill
8. Attendance

9. Tardiness
10. Company profitability and financial condition
11. Other matters as determined by members of the Management Advisory Team.

While advancement is given to some employees, it **is not** guaranteed or in any way automatic to all employees. The decision concerning each employee's advancement is solely at the discretion of the Management Advisory Team or their designees based upon the above factors as well as other factors that the committee deems appropriate in evaluating each employee's performance.

WORKPLACE EXPECTATIONS

Confidentiality

Our customers, clients and other parties with whom we do business entrusted Graham Roofing with important information relating to their businesses. It is our policy that all information considered confidential will not be disclosed to external parties or to employees without a "need to know." If an employee questions whether certain information is considered confidential, he/she should first check with his/her immediate supervisor.

This policy is intended to alert employees to the need for discretion at all times, and is not intended to inhibit normal business communications.

All inquiries from the media must be referred to Christee Holbrook in the West Point office.

Conflicts of Interest

Employees must avoid any relationship or activity that might impair, or even appear to impair, their ability to make objective and fair decisions when performing their jobs. At times, an employee may be faced with situations in which business actions taken on behalf of Graham Roofing may conflict with the employee's own personal interests. Company property, information or business opportunities may not be used for personal gain.

Conflicts of interest could arise in the following circumstances:

- Being employed by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while employed with Graham Roofing
- Hiring or supervising family members or closely related persons
- Serving as a board member for an outside commercial company or organization
- Owning or having a substantial interest in a competitor, supplier or contractor
- Accepting gifts, discounts, favors or services from a customer/potential customer, competitor or supplier, unless equally available to all company employees

Employees with a conflict-of-interest question should seek advice from management. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must seek review from members of the Management Advisory Team.

Outside Employment

Employees are permitted to engage in outside work or to hold other jobs, subject to certain restrictions as outlined below.

Activities and conduct away from the job must not compete with, conflict with or compromise the company interests or adversely affect job performance and the ability to fulfill all job responsibilities. Employees are prohibited from performing any services for customers on nonworking time that are normally performed by Graham Roofing. This prohibition also extends to the unauthorized use of any company tools, materials or equipment and the unauthorized use or application of any confidential information. In addition, employees are not to solicit or conduct any outside business during paid working time.

Employees are cautioned to carefully consider the demands that additional work activity will create before accepting outside employment. Outside employment will not be considered an excuse for poor job performance, absenteeism, tardiness, leaving early, refusal to travel or refusal to work overtime or different hours. If Graham Roofing determines that an employee's outside work interferes with performance, the employee may be asked to terminate the outside employment.

Employees who have accepted outside employment may not use paid sick leave to work on the outside job. Fraudulent use of sick leave will result in disciplinary action up to and including termination.

Attendance

At Graham Roofing all employees are expected to be at work every day and on time. This is a basic employment requirement that is expected of all employees.

Not reporting to work and not calling to report the absence is a no-call/no-show, and is a serious matter. The first instance of a no call/no show will result in disciplinary action to include a written warning. The second separate offense may result in termination of employment with no additional disciplinary steps.

A no call/no show lasting three days may be considered job abandonment, and may be deemed an employee's voluntary resignation of employment.

Tools

It is the policy of Graham Roofing to issue a set of tools to employees as needed for their use at work at no charge to the employee.

Routine tool checks will be performed. If you have missing tools, they will be replaced, and the cost taken out of the employee's payroll check. Broken tools will be replaced at no cost to the employee **if the employee turns in the broken tool(s).**

Employees must have their tools in **their possession at all times.** Do not leave your tools at the job site or in a truck. If you do not have your tools, you will be issued new tools, and the cost of

the new tools will be deducted from your payroll check. There will be no exceptions and no excuses.

All issued tools must be turned in at the end of employment. If you have missing tools upon the termination of employment, the cost of the missing tools will be deducted from your uniform deposit or last payroll check.

Electronic Communications

The following guidelines have been established for using the Internet, Graham Roofing-provided cell phones and e-mail in an appropriate, ethical and professional manner:

- Internet, company-provided equipment (e.g., cell phone, laptops and computers) and services may not be used for transmitting, retrieving or storing any communications of a defamatory, discriminatory, harassing or pornographic nature.
- The following actions are forbidden: using disparaging, abusive, profane or offensive language; creating, viewing or displaying materials that might adversely or negatively reflect upon Graham Roofing or be contrary to Graham Roofing's best interests; and engaging in any illegal activities, including piracy, cracking, extortion, blackmail, copyright infringement and unauthorized access of any computers and company-provided equipment such as cell phones and laptops.
- Employees may not copy, retrieve, modify or forward copyrighted materials, except with permission or as a single copy to reference only.
- Employees must not use the system in a way that disrupts its use by others. Employees must not send or receive large files that could be saved/transferred via thumb drives, large email transfer, Drop Box or anything comparable. Employees are prohibited from sending or receiving files that are not related to work.
- Employees should not open suspicious e-mails, pop-ups or downloads. Contact Christee Holbrook in the West Point office at 662/492-9555 with any questions or concerns to reduce the release of viruses or to contain viruses immediately.
- Internal and external e-mails are considered business records, and may be subject to discovery in the event of litigation. Be aware of this possibility when sending e-mail within and outside the company.

Right to Monitor

All company-supplied technology and company-related work records belong to the company and not to the employee. Graham Roofing routinely monitors use of company-supplied technology. Inappropriate or illegal use or communications may be subject to disciplinary action up to and including termination of employment.

Cell Phone Policy

Cell Phone Defined

For the purpose of this Policy, the term Cell Phone is defined as any handheld electronic device with the ability to receive and/or transmit voice, text, or data messages without a cable connection including, but not limited to, cellular phones, digital wireless phones, radio-phones/walkie-talkies, pagers, Personal digit assistants (PDAs) with wireless communication or iPads.

Personal Cell Phone Policy

Graham Roofing allows their employees to carry personal cell phones. However, personal calls during the work hours, regardless of the phone used can interfere with employee productivity and be distracting to others. Therefore, **personal calls are to be made on authorized breaks or during the lunch hour unless it is an emergency.** Employees in violation of this policy may be subject to disciplinary action or termination.

Graham Roofing will not be liable for the loss or damages of personal cell phones brought to the workplace.

Company-Issued Cell Phone Policy

Where job or business needs demand immediate employee access, a business cell phone may be issued. You will be notified in writing of your cellular plan. If you go over your minutes due to personal usage, the cost of the extra minutes will be deducted from your payroll check. Also, any charges that the company incurs due to downloads, text messages or internet usage, that are not included in your plan, will be deducted from your payroll check. Employees in possession of Company cell phones are expected to protect the equipment from loss, damage or theft. If your phone is lost or damaged, you could be charged the replacement cost of the comparable phone. Graham Roofing encourages purchasing insurance for your device. Please contact Misty McCraw in the West Point office at 662/492-9555 for more information. Upon resignation or termination of employment, or at any time upon request, the employee must return the equipment.

Cell Phones and Driving Policy

Graham Roofing advocates safe and responsible driving habits. This includes not only adherence to traffic laws, speed limits and the use of seat belts, but also to limiting distractions while operating a motor vehicle through the use of handheld electronic devices.

It is the policy of Graham Roofing that no employee will be permitted to use any type of handheld electronic device while operating a commercial motor vehicle (CMV), a Graham Roofing vehicle or while driving their personal vehicle on Graham Roofing business.

This includes, but is not limited to, wireless phones, laptops, tablets, GPS systems, calculators, on-line e-mail, pagers, PDAs, and any other communication or entertainment devices.

Responsibility

It is the responsibility of management to review this policy with every existing employee as well as new hires.

It is the responsibility of all Graham Roofing employees to adhere to this policy when in Graham Roofing vehicles or conducting Graham Roofing business in their personal vehicles.

Procedures and Guidelines

In order to foster a safe driving environment and to protect the welfare not only of our employees but other persons whose safety could be jeopardized by distracted driving, the following guidelines will be used:

- Graham Roofing employees are prohibited from using text messaging, email or any similar form of electronic communication while operating a motor vehicle on Graham Roofing business.
- Graham Roofing employees are prohibited from using a cell phone while operating a motor vehicle on Graham Roofing business, unless such use is through a hands free device.
- The only exception to the above prohibitions is an emergency call placed to Graham Roofing and/or 911 for situations such as a traffic accident, road hazard, a medical emergency or a fire. In such cases, the communication should be as short as reasonably necessary to communicate the nature of the emergency, location and other vital information.

Safety Precautions

Graham Roofing employees are generally encouraged to adhere to the following behaviors and safety precautions while operating a Graham Roofing motor vehicle:

- Attempt to make all calls or other communications before departing on a trip or after arriving at your destination.
- Consider turning off, putting on silent or vibrate, wireless phones or other devices before starting the vehicle.
- Pull over to a safe place, and put the vehicle in **"Park"** if a call or text message must be made or received while on the road.
- Consider modifying your voice mail greeting to indicate that you are unavailable to answer calls or return messages while driving.
- Inform customers, clients, associates and business partners of this policy as an explanation of why calls may not be returned immediately.
- Avoid the use of cell phones in hazardous conditions due to weather, road conditions, or traffic congestion and conditions.
- Do not program nor adjust any GPS system, smartphone, MP3 player, or any other electronic or entertainment device while driving.

Implementation

Graham Roofing will inform each existing employee and new hire as to the requirements of this

policy. Graham Roofing will document the time and date that this policy is reviewed with each employee. A copy of the signed document will be retained in the employee's Driver Qualification File and Personnel File.

- Any employee found violating this policy will be subject to disciplinary action up to and including termination.
- Any traffic ticket received by a driver, for the illegal use of a cell phone, electronic or entertainment device, will be the sole responsibility of the driver and must be reported to Graham Roofing within 24 hours of its issuance.
- Failure to notify Graham Roofing will result in disciplinary action up to and including termination of employment.

Social Media

Below are guidelines for social media use.

- Post only appropriate and respectful content.
- Maintain the confidentiality of Graham Roofing trade secrets and private or confidential information. Trade secrets may include information regarding the development of systems, processes, products, know-how and technology. Do not post internal reports, policies, procedures or other internal business-related confidential communications.
- Express only your personal opinions. Never represent yourself as a spokesperson for Graham Roofing. If Graham Roofing is a subject of the content you are creating, be clear and open about the fact that you are an associate, and make it clear that your views do not represent those of Graham Roofing employees, customers, suppliers or people working on behalf of Graham Roofing. If you do publish a blog or post online related to the work you do or subjects associated with Graham Roofing, make it clear that you are not speaking on behalf of the company. It is best to include a disclaimer such as "The postings on this site are my own, and do not necessarily reflect the views of Graham Roofing."

Graham Roofing may monitor content out on the Internet. Policy violations may result in discipline up to and including termination of employment.

Solicitation & Distribution Policy

It is the policy of Graham Roofing to prohibit solicitation and distribution on its property or jobsites by non-employees and to permit solicitation and distribution by employees only as outlined below:

Graham Roofing limits solicitation and distribution on its property and jobsites because, when left unrestricted, such activities can interfere with the normal operations of the Company, can be detrimental to efficiency, can be annoying and can pose a threat to security.

All managers are responsible for administering this policy and for enforcing its provision.

Persons who are employed by Graham Roofing are prohibited from soliciting funds or signatures, conducting membership drives, posting, distributing literature or gifts, offering to sell or purchase merchandise or services (except by representative of suppliers properly identified) or engaging in any other solicitation, distribution or similar activity on Company property or jobsites.

Graham Roofing will permit employees to engage in solicitation or distribution of literature for any group or organization, including charitable organizations, with the following guidelines:

- Solicitation and distribution of literature with appropriate, prior approval from a member of the Management Advisory Team should not interfere with working times of either the employee making the solicitation or distribution, or the targeted employee. The term "working time" does not include an employee's authorized lunch or rest periods or other time when the employee is not required to be working.

Graham Roofing maintains bulletin boards to communicate Company information to employees and to post notices required by law. An unauthorized posting of notices, photographs, business cards or other printed or written materials on the bulletin boards or any other Company property is prohibited and will be removed.

Progressive Discipline

Graham Roofing and all employees, once hired, are only bound by a terminable at-will agreement. This means that either party (Graham or its employee) may terminate the employment at any time and **no cause shall be required.**

Whenever employee performance, attitude, work habits or personal conduct fall below a desirable level, supervisors shall inform employees promptly and specifically of such lapses. **It is understood that not all corrective actions are written as many are simply verbal coaching.** This policy addresses the written procedures for correcting employee behavior and the steps identified below.

If appropriate and justified, a reasonable period of time for improvement may be allowed before initiating disciplinary action. In some instances, a specific incident in and of itself may justify severe initial disciplinary action, up to and including termination of employment. However, the action to be taken depends on the seriousness of the incident, the employee's work history, including work performance and attendance.

Disciplinary action shall be no more severe than reasonably necessary to correct behavior and/or performance of an employee. Acceptable disciplinary actions may, depending upon the circumstances, include but are not limited to:

- a. Verbal reprimand
- b. Written reprimand
- c. Suspension, or
- d. Dismissal

Behavior listed below is considered proper cause for disciplinary action or discharge. Whether an employee is reprimanded, suspended or dismissed or given other disciplinary action will be determined by a member (s) of the Management Advisory Team after consultation with other team members and or supervisors.

1. Stealing
2. Habitual tardiness
3. Habitual absenteeism: **Call in personally thirty (30) minutes before starting time if you need to be off. Do not send word by someone else or have someone else call in for you.**
4. Being absent without notifying supervisor
5. Carelessness or negligence resulting in excessive waste, damage, loss or inferior work.
6. Improper or careless use of trucks and equipment
7. Timecard dishonesty or punching someone else's timecard
8. Lying to superiors
9. Bringing intoxicants, drugs or like substances onto the work place or being under the influence of the same.
10. Unauthorized use of tobacco products
11. Gambling on company property
12. Conviction of any crime of a serious nature
13. Dishonesty, deliberate deception, fraud or theft
14. Falsification of company records
15. Horseplay, fighting or deliberately injuring another employee
16. Insubordination - Refusal to perform or carry out orders
17. Breach of confidential company information
18. Disrespect for supervisors
19. Unbecoming behavior that brings reproach on the company (shouting at girls, loud, boisterous behavior, etc.)
20. Other matters or behavior as determined by the officers or Management Advisory Team of the company deemed to be sufficient to merit discharge or other disciplinary action.
21. Failing a drug screen or refusing to submit to a drug screen for any purpose.

Remember, this list is not intended to represent all unacceptable behaviors or violations or to establish a "just cause" standard of employment, and as always you may terminate your employment at any time, and the company retains the right to do the same. Further, the company continually updates and reviews its policies, and its disciplinary procedure is subject to change.

On your last day, report to the office for a final interview to settle all business matters. Terminated employee's checks are issued at 4:00 p.m. on Friday following termination after uniforms, tools, and other charges are cleared.

Should an employee be reemployed after previous termination or voluntary departure, that employee shall be reinstated with no seniority.

Health and Safety Policy

Graham Roofing's most valuable asset is its employees. Because of this, Graham Roofing wants to provide its employees with a safe and healthy work environment by developing a health and safety policy. In an effort to stay up-to-date and effective, this policy will be modified as the company grows and to comply with federal, state, and local laws, ordinances and regulations; industry standards; and OSHA regulations and requirements.

This program applies to all employees working on any jobsite. This safety program has been established to promote safety and to minimize and control hazards and risks associated with our profession. The specific goals of this program are as follows;

1. Minimize personal injuries and property damage
2. Achieve greater efficiency
3. Reduce direct and indirect costs

Safety is a top priority at Graham Roofing. The effectiveness of this safety program will depend upon the active participation and cooperation of all employees. Managers and supervisors will be held as accountable for safety as they are for production, quality, efficiency and profitability. Employees also will be held accountable for following the safe work practices required on each project. Our objective is to increase employee awareness through employee training. We believe that trained employees can make better decisions in the field. When coupled with direction from knowledgeable field supervision, projects will be safer places to work.

In the course of conducting work and completing work assignments, safety takes precedence over production. Employees are responsible for their own safety and at Graham Roofing a philosophy of "safe production" requires a balance of adopting safe work practices and production practices. Safety first is our objective on each job.

Graham Roofing intends to take a proactive approach to safety, involving safety planning from the initial review of a prospective project to its completion and by planning all work to minimize the potential for personal injury, property damage and loss of productive time. We plan to identify all workplace hazards, and maintain a system of prompt detection and correction of unsafe practices and conditions. By doing so, strategies to control and eliminate workplace hazards can be developed.

This safety program's implementation is intended to reduce and eliminate accidents and injuries. All accidents and injuries, no matter how minor, should be reported immediately to your supervisor, and an accident report completed.

The complete safety policy manual can be viewed at Graham Roofing's corporate office. Contact Christee Holbrook at 662/492-9555 for more information.

Threat Policy

Graham Roofing is aware of the fact that violence in the work place has become a more evident and pervasive problem during the 21st century. Therefore, Graham Roofing adopts the following policy as of July 18, 2003.

Any threats made in the work place, whether real or perceived, shall be viewed seriously by the Management Advisory Team of Graham Roofing. A "real threat" shall be perceived as a threat that has been carried out to completion. A "perceived threat" is a threat, whether made in jest or in seriousness, which appears, from all the surrounding circumstances (in the mind of a reasonable person), to be considered a threat or thought of as intimidation.

Threats shall include completed acts, attempted acts, and may be physical and verbal in nature and shall include intimidation of an employee by another employee or personnel of Graham Roofing.

"Intimidation" shall be viewed as an attempt by words or actions, which bring about fear, anxiety or fright on the part of another individual.

Any threats, intimidation, actions whether completed or attempted shall be dealt with strictly in the Graham Roofing work place. Discipline shall be swift and severe. The range of discipline shall be from written reprimand through discharge. An act shall be disciplined and the severity of the punishment shall be equivalent to the severity or the outcome or result of said act.

Weapons Policy

Employees may not, while on any property owned, leased or controlled by Graham Roofing, including anywhere the company business is conducted, such as jobsites, trade shows, vehicles and so forth, possess or use any weapon. This policy shall not be construed to limit the rights of an employee under Miss. Code Ann § 45-9-55 to possess, transport, or store a firearm in his/her locked private vehicle (your own vehicle) in any parking lot, parking garage or other designated parking area. Weapons include, but are not limited to, guns, knives or swords with blades over four inches in length, explosives and any chemical whose purpose is to cause harm to another person.

Regardless of whether an employee possesses a concealed weapons permit or is allowed by law to possess a weapon, weapons are prohibited on any company property or in any location in which the employee represents the company for business purposes.

Possession of a weapon can be authorized by a member of the Management Advisory Team to allow a trained employee to have a weapon when conducting company business when this possession is determined necessary to secure the safety and security of company employees. Only a member of the Management Advisory Team may authorize in writing the carrying of or use of a weapon.

Employees who violate this policy will be subject to disciplinary actions, up to and including employment termination.

Tobacco Free Workplace

Effective January 1, 2009, Graham Roofing adopted a tobacco free workplace to provide a healthier environment for its employees:

- No tobacco use by employees, visitors or vendors
- No tobacco use on Graham Roofing's property or in company vehicles
- No tobacco use by employees when working outside the office or during business travel
- Employees must refrain from the use of tobacco on any neighboring property indoors or outdoors
- All employees must sign a tobacco-free statement to ensure understanding of the workplace policy.

HOLIDAYS, VACATIONS AND PERSONAL TIME OFF

Fulltime employees receive the following time off for vacation, personal leave, sick leave and holidays:

Vacation

New Employees are eligible for vacation as follows:

<u>Hire Date</u>	<u>Next Calendar Year</u>	<u>Subsequent Years</u>
January - March	5 days	5 days
April - June	4 days	5 days
July - September	3 days	5 days
October or November	2 days	5 days
December	1 day	5 days

- Vacation days are contingent upon one year of continuous employment.
- Additional vacation days may be added in lieu of a raise.
- Vacation days must be used within one (1) calendar year (days cannot be carried over to the following year).
- Employees cannot be paid for vacation days in the first quarter unless the vacation days are actually taken.
- If the Employee or the Employer for any reason terminates an employee's relationship with the Company, all accumulated vacation time is forfeited.

Holidays

Paid holidays (Paid after 1 year of continuous employment)

New Year's Day (January 1)

July 4th

Thanksgiving Day

Christmas Day

Unpaid holidays

Memorial Day

Labor Day

Friday after Thanksgiving

Personal and Sick Leave

Personal and sick leave.....10 days unpaid

Unplanned Absences – Emergencies do occur!

- Call in at least 30 minutes prior to start time each day you are off. You **MUST** talk to someone.
- **Text messages are not acceptable.**

Planned Absences

- As soon as possible but prior to the need to be off, employees must complete a Personal or Vacation Request form and submit the form to Misty McCraw in the West Point office for approved by management. An approved copy of the request form will be returned to the employee. If the form has not been returned prior to the absence the employee must contact Misty McCraw in the West Point office at 662/492-9555.
- After 10 days off for unpaid personal and sick leave have been taken, additional days off are to be taken against vacation time. The employee will be paid for each day of vacation off until his vacation is exhausted.
- In an effort to protect all employees, Graham Roofing requires that if an employee has been off work for any reason requiring a physician's care then that employee can return to work only after providing management with a valid release from the physician.
- If you are off work to be with someone else due to an illness, you must provide some form of written excuse or proof. Otherwise, the absence will be considered an unexcused absence. Unexcused absences could affect raises, bonuses, advancement or may result in disciplinary action such as termination.
- Graham Roofing will not be responsible for transporting an employee to a planned appointment. Please discuss any needs with your General Superintendent.

Family and Medical Leave Act and other Federal Employment Laws

Graham Roofing complies with all federal and state laws in making all employment decisions and does not discriminate against any employee or job applicant in any manner that would be considered a violation of these laws.

The Family and Medical Leave Act (FMLA) became effective on August 5, 1993. FMLA entitles eligible employees to take up to 12 weeks of unpaid, job-protected leave in a 12-month period for specified family and medical reasons. The employer may elect to use the calendar year, a fixed 12-month leave or fiscal year, or a 12-month period prior to or after the commencement of leave as the 12-month period.

The law contains provisions on employer coverage; employee eligibility for the law's benefits; entitlement to leave, maintenance of health benefits during leave, and job restoration after leave; notice and certification of the need for FMLA leave; and protection for employees who request or take FMLA leave.

FMLA applies to all:

- public agencies, including state, local and federal employers, local education agencies (schools), and
- private sector employers who employed 50 or more employees in 20 or more workweeks in the current or preceding calendar year

To be eligible for FMLA benefits, an employee must:

1. work for a covered employer;
2. have worked for the employer for a total of 12 months
3. have worked at least 1,250 hours over the previous 12 months; and
4. worked at a location in the United States or in any territory or possession of the United States where at least 50 employees are employed by the employer within 75 miles.

A covered employer must grant an eligible employee up to a total of 12 work weeks of unpaid leave during any 12-month period for one or more of the following reasons:

- for the birth and care of the newborn child of the employee;
- for placement with the employee of a son or daughter for adoption or foster care;
- to care for an immediate family member (spouse, child, or parent) with a serious health condition; or
- to take medical leave when the employee is unable to work because of a serious health condition.

Leave for birth and care, or placement for adoption or foster care must conclude within 12 months of the birth or placement.

Under some circumstances, employees may take FMLA leave intermittently — which means taking leave in blocks of time, or by reducing their normal weekly or daily work schedule.

- If FMLA leave is for birth and care or placement for adoption or foster care, use of intermittent leave is subject to the employer's approval.
- FMLA leave may be taken intermittently whenever medically necessary to care for a seriously ill family member, or because the employee is seriously ill and unable to work.

Also, subject to certain conditions, employees or employers may choose to use accrued paid leave (such as sick or vacation leave) to cover some or all of the FMLA leave. The employer is responsible for designating if an employee's use of paid leave counts as FMLA leave based on information from the employee.

"Serious health condition" means an illness, injury, impairment, or physical or mental condition that involves either:

- any period of incapacity or treatment connected with inpatient care (i.e., an overnight stay) in a hospital, hospice, or residential medical care facility, and any period of incapacity or subsequent treatment in connection with such inpatient care; or
- continuing treatment by a health care provider which includes any period of incapacity (i.e., inability to work, attend school or perform other regular daily activities) due to:
 - (1) A health condition (including treatment of or recovery from) lasting more than three consecutive days
 - (2) Pregnancy or prenatal care (a visit to a health care provider is not necessary for each absence)
 - (3) A chronic serious health condition which continues over an extended period of time, requires periodic visits to a health care provider, and may involve occasional episodes of incapacity (e.g., asthma, diabetes). A visit to a health care provider is not necessary for each absence; or
 - (4) A permanent or long-term condition for which treatment may not be effective (e.g., Alzheimer's, a severe stroke, terminal cancer). Only supervision by a health care provider is required, rather than active treatment; or
 - (5) Any absences to receive multiple treatments for restorative surgery or for a condition which would likely result in a period of incapacity of more than three days if not treated (e.g., chemotherapy or radiation treatments for cancer).

Pursuant to the National Defense Authorization Act of 2008, certain employees who have family members in the Armed Forces, including the National Guard and Reserves, may qualify for FLMA under certain circumstances.

- Leave During Family Member's Active Duty – Employees who have a spouse, parent or child who is on or has been called to active duty in the Armed Forces may take up to 12 weeks of FMLA leave yearly when they experience a "qualifying exigency." Qualifying exigencies for which employees can use FLMA leave include:
 - (1) Short-notice deployment
 - (2) Military events and related activities
 - (3) Child-care and school activities
 - (4) Financial and legal arrangements
 - (5) Counseling
 - (6) Rest and recuperation
 - (7) Post-deployment activities and
 - (8) Additional activities not encompassed in the other categories by which the employer and employee can agree to the leave.

- Injured Service Member Family Leave – Employees who are the spouse, parent, child or next of kin of a service member who incurred a serious injury or illness on active duty in the Armed Forces may take up to 26 weeks of leave to care for the injured service member in a 12-month period (in combination with regular FMLA leave).

"Health care provider" means:

- doctors of medicine or osteopathy authorized to practice medicine or surgery by the state in which the doctors practice; or
- podiatrists, dentists, clinical psychologists, optometrists and chiropractors (limited to manual manipulation of the spine to correct a subluxation as demonstrated by X-ray to exist) authorized to practice, and performing within the scope of their practice, under state law; or
- nurse practitioners, nurse-midwives and clinical social workers authorized to practice, and performing within the scope of their practice, as defined under state law; or
- Christian Science practitioners listed with the First Church of Christ, Scientist in Boston, Massachusetts; or
- Any health care provider recognized by the employer or the employer's group health plan benefits manager.

A covered employer is required to maintain group health insurance coverage for an employee on FMLA leave whenever such insurance was provided before the leave was taken and on the same terms as if the employee had continued to work. If applicable, arrangements will need to be made for employees to pay their share of health insurance premiums while on leave. In some instances, the employer may recover premiums it paid to maintain health coverage for an employee who fails to return to work from FMLA leave.

Upon return from FMLA leave, an employee must be restored to the employee's original job, or to an equivalent job with equivalent pay, benefits, and other terms and conditions of employment.

In addition, an employee's use of FMLA leave cannot result in the loss of any employment benefit that the employee earned or was entitled to before using FMLA leave, nor be counted against the employee under a "no fault" attendance policy.

Under specified and limited circumstances where restoration to employment will cause substantial and grievous economic injury to its operations, an employer may refuse to reinstate certain highly-paid "key" employees after using FMLA leave during which health coverage was maintained. In order to do so, the employer must:

- notify the employee of his/her status as a "key" employee in response to the employee's notice of intent to take FMLA leave;
- notify the employee as soon as the employer decides it will deny job restoration, and explain the reasons for this decision;
- offer the employee a reasonable opportunity to return to work from FMLA leave after giving this notice; and
- make a final determination as to whether reinstatement will be denied at the end of the leave period if the employee then requests restoration.

A "key" employee is a salaried "eligible" employee who is among the highest paid ten percent of employees within 75 miles of the work site.

Employees seeking to use FMLA leave are required to provide 30-day advance notice of the need to take FMLA leave when the need is foreseeable and such notice is practicable. Employers may also require employees to provide:

- medical certification supporting the need for leave due to a serious health condition affecting the employee or an immediate family member;
- second or third medical opinions (at the employer's expense) and periodic recertification; and
- periodic reports during FMLA leave regarding the employee's status and intent to return to work.

When intermittent leave is needed to care for an immediate family member or the employee's own illness, and is for planned medical treatment, the employee must try to schedule treatment so as not to unduly disrupt the employer's operation.

Covered employers must inform employees of their rights and responsibilities under FMLA, including giving specific written information on what is required of the employee and what might happen in certain circumstances, such as if the employee fails to return to work after FMLA leave. If more information is required, please see your supervisor or Suzanne Richardson.

The federal government has also enacted Title II of the Genetic Information Nondiscrimination Act of 2008, which prohibits genetic information discrimination in employment, which took effect on November 21, 2009.

- Under Title II of the Genetic Information Nondiscrimination Act (GINA), it is illegal to discriminate against employees or applicants because of genetic information. Title II of GINA prohibits the use of genetic information of an employee, an applicant and their family members in making employment decisions, restricts acquisition of genetic information by employers and other entities covered by Title II, and strictly limits the disclosure of genetic information.

The EEOC enforces Title II of GINA (dealing with genetic discrimination in employment). The Departments of Labor, Health and Human Services and the Treasury have responsibility for issuing regulations for Title I of GINA, which addresses the use of genetic information in health insurance.

Further information on GINA and other federal employment laws may be found on the EEOC posters prominently displayed on the premises of Graham Roofing.

EDUCATION ASSISTANCE FOR EMPLOYEE CHILDREN

Effective January 1, 1993, Graham Roofing initiated a policy to help offset the expenses of employees' children college tuition and books. Qualified employee's children will receive \$500.00 per semester at the end of the semester enrolled at an accredited college. This money must go toward tuition and books.

The following requirements must be met:

1. Employee must be a full time employee of Graham Roofing for seven consecutive years prior to the time the dependent child is enrolled in college.
2. Student must be the legal dependent of the employee and the employee is responsible for the expenses of higher education of that student.
3. Student must be enrolled at an accredited college or university and be taking a full course load as defined by the college or university.
4. Student must maintain an overall 2.0 (C average) for the semester.
5. Student will be limited to receiving this assistance for eight semesters which must fall into a period of five years from initial enrollment at the college or university. (Total assistance: Eight semesters x \$500 = \$4,000)
6. Student must present Graham Roofing with valid transcript of college grades at end of semester.
7. Assistance will be sent to the school in the student's name upon attaining the qualifications set forth in Numbers 1 thru 6 above.
8. The Management Advisory Team of Graham Roofing reserves the right to amend or terminate this policy at any time.

This is an effort by Graham Roofing to help offset the cost of college tuition and books that many of you will face. Please contact a member of the Management Advisory Team with any questions.

UNIFORMS

All employees are required to wear uniforms. Uniforms will be ordered after two (2) weeks of employment. A total of Three Hundred Thirty Six Dollars (\$360.00) for your uniform deposit will be deducted from the employee's payroll check at the rate of Fifteen Dollars (\$15.00) per week, until paid in full. This deposit will be refunded to individuals provided **all** uniforms are returned in good condition, within 2 weeks after last day worked and all other charges are settled at the end of their employment. It is the employee's responsibility to keep up with uniforms. Graham Roofing takes no responsibility for lost or missing uniforms.

SUBSTANCE ABUSE PREVENTION AND DETECTION PROGRAM

Drug-Free Workplace

Graham Roofing has a longstanding commitment to provide a safe and productive work environment. Alcohol and drug abuse pose a threat to the health and safety of our employees and to the security of our equipment and facilities. For these reasons, Graham Roofing is committed to the elimination of drug and/or alcohol use and abuse in the workplace.

This policy outlines the practice and procedure designed to correct instances of identified alcohol and/or drug use in the workplace. This policy applies to all employees and all applicants for employment of Graham Roofing. All employees and specifically the Safety Director is responsible for policy administration.

Drug-Free Awareness

Illegal drug use and alcohol misuse have a number of adverse health and safety consequences. Information about those consequences and sources of help for drug/alcohol problems is available from the Safety department.

Graham Roofing will assist and support employees who voluntarily seek help for such problems before becoming subject to discipline and/or termination under this or other policies. Such employees may be allowed to use paid time off, placed on leave of absence, referred to treatment providers and otherwise accommodated as required by law. Such employees may be required to document that they are successfully following prescribed treatment and to take and pass follow-up drug and alcohol tests if they hold jobs that are safety sensitive or that require driving, operating equipment or if they have violated this policy previously.

Employees should report to work fit for duty and free of any adverse effects of prescribed legal drugs, illegal drugs or alcohol. This policy does not prohibit employees from the lawful use and possession of prescribed medications. Employees must, however, consult with their doctors about the medications' effect on their fitness for duty and ability to work safely, and promptly disclose any work restrictions to their supervisor. Employees should not, however, disclose underlying medical conditions unless directed to do so.

Drug-Free Work Rules

The following work rules apply to all employees:

- Whenever employees are working, are operating any Graham Roofing vehicle, are present on Graham Roofing premises, or are conducting related work off-site, they are prohibited from:
 - o Using, possessing, buying, selling, manufacturing or dispensing an illegal drug (to include possession of drug paraphernalia).
 - o Being under the influence of alcohol or an illegal drug as defined in this policy.

- o Using and/or dispensing a legal drug that is not prescribed to the employee personally.
- The presence of any detectable amount of any illegal drug or illegal controlled substance in an employee's body while performing Graham Roofing business or while in a Graham Roofing facility is prohibited.
- Graham Roofing will not allow any employee to perform their duties while taking prescribed drugs that are adversely affecting the employee's ability to safely and effectively perform their job duties. Employees taking a personally prescribed medication must carry it in the container labeled by a licensed pharmacist or be prepared to produce it if asked. Using and/or dispensing a legal drug that is not prescribed to the employee personally violates this policy.
- Any illegal drugs or drug paraphernalia will be turned over to an appropriate law enforcement agency and may result in criminal prosecution.

Required Testing

Graham Roofing retains the right to require the following tests:

- **Pre-employment:** After receiving an offer and before beginning work, all applicants must pass a pre-employment drug test. Refusal to submit to testing will result in disqualification of further employment consideration.
- **Reasonable suspicion:** Employees are subject to testing based on observations by a supervisor of apparent workplace use, possession or impairment. To include, when the Company has evidence of probable abuse by a number of employees based on information such as an unusual amount of post -accident positive test results, incidents of theft, lost productivity or reports of unexplained personal behavior, or other facts that would lead management to test specific individuals, group, work area, work location or sensitive job classifications due to safety concerns. Safety and a member of the Management Advisory Team must be consulted before sending an employee for reasonable suspicion testing.
- **Random:** Random test may be used routinely for all employees to prevent and detect substance abuse. Any form of substance abuse may affect the safety of operations through unsafe work behavior/performance or error in judgment, or substance abuse could jeopardize the safety and wellbeing of either the employee, other personnel or the general public
- **Post-accident:** Employees are subject to testing when they cause or contribute to accidents that seriously damage a Graham Roofing vehicle, machinery, equipment or property and/or result in an injury to themselves or another employee requiring off-site

medical attention. In any of these instances, the investigation and subsequent testing must take place within two (2) hours following the accident, if not sooner.

- **Follow-up:** Employees who have tested positive, or otherwise violated this policy, are subject to discipline up to and including discharge. Depending on the circumstances and the employee's work history/record, Graham Roofing may offer an employee who violates this policy or tests positive the opportunity to return to work on a last-chance basis pursuant to mutually agreeable terms, which could include follow-up drug testing at times and frequencies for a minimum of one (1) year but not more than two (2) years. If the employee either does not complete his/her rehabilitation program or tests positive after completing the rehabilitation program, he/she will be subject to immediate discharge from employment. All programs and resulting testing are at the employee's expense.
- **Job Specific or Government Required Testing:** Customers, companies and the government may require testing for site specific entry or to meet governmental regulations. The Company as mandated by the Department of Transportation (DOT), Federal Highway Administration (FHA) or other agencies for those employees working in regulated safety sensitive positions. These positions are classified by *DOT/FHA* regulations as regulated drivers of commercial motor vehicles operating in interstate commerce. Additionally, some states have chosen to apply these regulations to certain drivers who operate commercial vehicles in intrastate commerce. All employees who are required to have a federal commercial driver's license or who drive or have occasion to drive any vehicle which requires hazardous materials placards, or who drive a company truck, or a truck with a trailer with a gross vehicle weight of more than 8000 lbs. (GVWR).

Consequences

Applicants who refuse to cooperate in a drug test or who test positive will not be hired. Employees who refuse to cooperate in required tests or who use, possess, buy, sell, manufacture or dispense an illegal drug in violation of this policy will be terminated.

The first time an employee tests positive for alcohol or illegal drug use under this policy, the result will be discipline up to and including discharge.

Confidentiality

Information and records relating to positive test results, drug and alcohol dependencies and legitimate medical explanations provided to the medical review officer (MRO) shall be kept confidential to the extent required by law and maintained in secure files separate from normal personnel files.

Inspections

Graham Roofing reserves the right to inspect all portions of its premises for drugs, alcohol or other contraband. All employees, contract employees and visitors may be asked to cooperate in inspections of their persons, work areas and property that might conceal a drug, alcohol or other contraband. Employees who possess such contraband or refuse to cooperate in such inspections are subject to appropriate discipline up to and including discharge.

Crimes Involving Drugs

Graham Roofing prohibits all employees from manufacturing, distributing, dispensing, possessing or using an illegal drug in or on Graham Roofing premises or while conducting Graham Roofing business. Employees are also prohibited from misusing legally prescribed or over-the-counter (OTC) drugs. Law enforcement personnel shall be notified, as appropriate, when criminal activity is suspected.

WORKER'S COMPENSATION PROCEDURES

Whenever an employee is injured, no matter how minor the injury may seem, the following procedures should be followed:

1. An injured employee must report the injury immediately to the designated person at his location and get necessary treatment. If the employee is unable, his immediate supervisor is responsible for reporting.
2. The designated person is responsible for having drug and alcohol tests performed on all injured employees. If the injury was caused by another employee, that employee will also be tested.
3. Effective July 1, 2012, the Mississippi Senate Bill 2576 amends Section 71-3-121 as follows;

"(1) In the event that an employee sustains an injury at work or asserts a work-related injury, the employer shall have the right to administer drug and alcohol testing or require that the employee submit himself to drug and alcohol testing. If the employee has a positive test indicating the presence, at the time of injury, of any drug illegally used or the use of a valid prescription medication(s) taken contrary to the prescriber's instructions and/or contrary to label warnings, or eight one-hundredths percent (.08%) or more by weight volume of alcohol in the person's blood, it shall be presumed that the proximate cause of the injury was the use of a drug illegally, or the use of a valid prescription medication(s) taken contrary to the prescriber's instructions and/or contrary to label warnings, or the intoxication due to the use of alcohol by the employee. If the employee refuses to submit himself to drug and alcohol testing immediately after the alleged work-related injury, then it shall be presumed that the employee was using a drug illegally, or was using a valid prescription medication(s) contrary to the prescriber's instructions and/or contrary to label warnings, or was intoxicated due to the use of alcohol at the time of the accident and that the proximate cause of the injury was the use of a drug illegally, or the use of a

valid prescription medication(s) taken contrary to the prescriber's instructions and/or contrary to label warnings, or the intoxication due to the use of alcohol of the employee. The burden of proof will then be placed upon the employee to prove that the use of drugs illegally, or the use of a valid prescription medication(s) taken contrary to the prescriber's instructions and/or contrary to label warnings, or intoxication due to the use of the use of alcohol was not a contributing cause of accident in order to defeat the defense of the employer provided under Section 71-3-7.

(2) The results of the drug and alcohol tests, employer-administered or otherwise, shall be considered admissible evidence solely on the issue of causation in the determination of the use of drugs illegally, or the use of a valid prescription medication(s) taken contrary to the prescriber's instructions and/or contrary to label warnings, or the intoxication due to the use of alcohol of an employee at the time of injury for workers' compensation purposes under Section 71-3-7.

(3) No cause of action for defamation of character, libel, slander or damage to reputation arises in favor of a person against an employer under the provisions of this section."

4. Designated people at each location are:
West Point -Christee Holbrook
Saltillo – Jonathan Poland
5. Within one (1) business day following the accident, the designated person should take written statements from the injured employee, his direct supervisor and any witnesses.
6. The designated person will complete an incident report and send to Christee Holbrook in the West Point office. Also, the designated person is responsible for notifying key people at his location. Do not rely on anyone else to do this!!!
7. Based on injuries that have occurred, injured employees will be retrained in applicable safety practices by safety officers.
8. If the injured employee sees a doctor, he cannot come back to work until he brings a written release from the doctor. The availability of light duty will be determined on a case by case basis.
9. Depending on the severity of the injury, members of the Management Advisory Team will decide if the claim will be turned over to workers' comp insurance. Therefore, initially, all medical bills and doctor's notes should be sent to the West Point office.
10. Once workers' comp insurance gets involved, Graham Roofing is no longer responsible for processing the claim. However, the designated person should remain in contact with the employee on a weekly basis and should report his status to Christee Holbrook in the West Point office.
11. The designated person at each office must make sure that all employees from his location understand:
 - a. Workers' comp will not pay the employee for missed wages until the employee has been off work for five (5) consecutive days. If the employee is off more than two (2) consecutive weeks, workers comp will go back and pay for the 1st missed day of lost wages.

- b. The payment for missed wages is approximately 2/3 of the employee's average wages for 52 weeks prior to the accident.
- c. Payment will come from the insurance company, not Graham Roofing.
- d. Workers' comp does not require employees, who have returned to work, be paid for time missed for doctor's appointments.

Management Advisory Team

Effective August 1, 2016 the Management Advisory Team members are:

Christee Holbrook – West Point, 662/492-9555 (office) 662/574-2019 (cell)

Suzanne Richardson – West Point, 662/492-9555 (office) 662/549-0270 (cell)

Jonathan Poland – Tupelo, 662/869-0012 (office) 662/213-7790 (cell)

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Introduction to Safety Manual

**GRAHAM ROOFING
MANAGEMENT COMMITMENT AND INVOLVEMENT
POLICY STATEMENT**

Graham Roofing is committed to providing employees with a safe and healthy workplace. It is our policy that employees report unsafe conditions and do not perform work tasks if the work is considered unsafe. Employees must report all accidents, injuries and unsafe conditions to their supervisors. No such report will result in retaliation, penalty, or other disincentive.

Employee recommendations to improve safety and health conditions will be given thorough consideration by our management team. Similarly, management will take disciplinary action against an employee who willfully or repeatedly violates workplace safety rules. This action may include verbal or written reprimands and may ultimately result in termination of employment.

Safety Management begins with Top Management accepting the responsibility to provide visible support and involvement by:

- Assigning safety responsibilities to individuals.
- Communicating a clear goal for the safety program.
- Committing the necessary personnel with enforcement authority and resources to ensure employee safety.

All employees will receive a copy of the Graham Roofing safety manual upon hire. In addition a copy of the manual will be located at the following locations:

- Shop
- Job foreman's truck
- Safety trailers
- Office

If you have any questions, please direct your questions to Christee Holbrook.

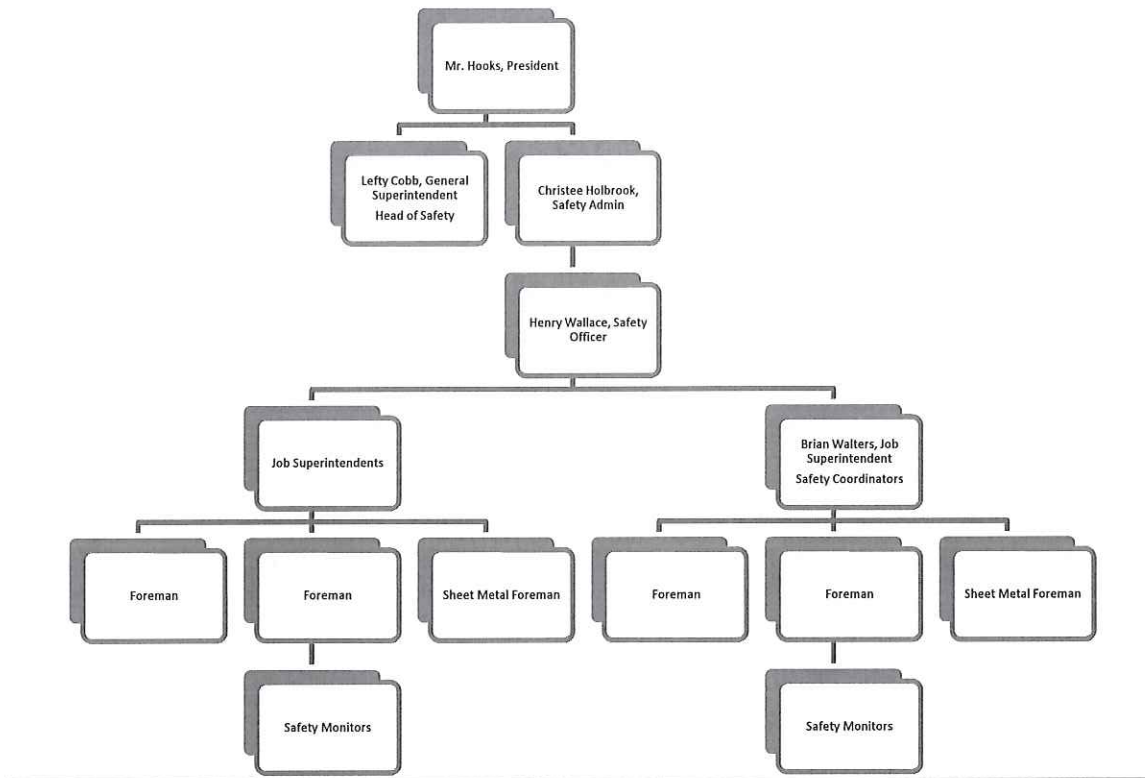
Bobby Hooks, President
Graham Roofing

03/31/2017
Date

Safety and Health Responsibilities

Graham Roofing Incorporated

Safety Organizational Chart



<u>Head of Safety</u>	Lefty Christee	General oversight of safety program and safety equipment Safety Adm
<u>Safety Inspector</u>	Henry	All Operations
<u>Safety Coordinators</u>	Ken Brian	West Point, MS Operations Saltillo, MS Operations

Responsibilities of Safety Inspector and or Safety Coordinators:

Safety Equipment

Research what and how much to issue to each crew
Lead discussion
Turn request for new equipment into Christee
Experiment to find most efficient equipment
Train men in proper operation of the new equipment
Trailer set up
Inspect
Inventory – maintain properly organized storage
Keep records

Training

Monday morning safety talks
New worker orientation for all new hires
PPE – 1 hour lesson for each employee annually
On the job training
Scheduling and record keeping of all company training and certifications

Job Set Up

Prepare safety plan for each job prior to starting actual work
Review job safety plan with foreman and safety monitors
Be at job start up to ensure all of plan is in place
Inspect jobs and fill out inspection forms at least weekly, maybe 2 or 3 times a week (as necessary)
Ensure compliance with all OSHA regulations
Keep up with documentation

Compliance

Inspect all aspects of projects for safety compliance
Document all violations of compliance
Write up all violators and retrain individual/company
Make corrections to all violations on the spot
Inspect all equipment to make sure it meets all the safety regulations

Documentation

documentation of all responsibilities and processes is very critical

GRAHAM ROOFING SAFETY AND HEALTH RESPONSIBILITY

Safety and Health Orientation- Workplace safety and health orientation begins on the first date of initial employment or job transfer. Each employee has access to a copy of this safety manual through his or her supervisor for review and future reference. Supervisors will ask questions of employees and answer employees' questions to ensure knowledge and understanding of safety rules, policies, and job specific procedures described in our workplace safety program manual. All employees will be instructed by their supervisors that compliance with the safety rules described in the workplace safety manual is required.

Job-Specific Responsibilities

Management:

Safety begins with Upper Management accepting responsibility to provide support and involvement by:

- Assigning safety responsibilities to individuals
- Communicating a clear goal for the safety program
- Authorizing the necessary personnel with enforcement authority and resources to ensure employee safety.
- Authorizing the budget and expenditures for safety.
- Holding executives, department supervisors and job supervisors accountable for a high level of performance towards safety.
- Setting the proper example for safety

Site Superintendents:

The Site Superintendents are responsible for the following:

- Initially training employees on how to perform assigned job tasks safely.
- Carefully reviewing with each employee the specific safety rules, policies, and procedures that are applicable and that are described in the workplace safety manual.
- Giving employees verbal instructions and specific directions on how to do the work safely.
- Observing employees performing the work. If necessary, the supervisor will provide a demonstration using safe work practices, or remedial instruction to correct training deficiencies before using the equipment.
- Reviewing safe work practices with employees before permitting the performance of new, non-routine, or specialized procedures.
- Enforcing the safety program in regard to employees, subcontractors and visitors and notifying management if noncompliance becomes an issue.
- Assisting with weekly Toolbox Talks or other training as needed

Employees:

Employees are responsible for the following:

- Preventing injury to themselves, other persons, or damage to equipment or property
- Reporting to their supervisors any hazardous conditions or procedures that affect themselves, their fellow workers, or their work area.
- Reading and understanding policies set forth in this manual.
- Using the required safety devices and proper personal protective equipment.
- Assisting in making the job as safe as possible.
- Reporting any suggestion to your supervisor or the safety coordinator.
- Assisting with weekly Toolbox Talks or other training as needed

Periodic Re-training of Employees

All employees will be re-trained periodically on safety rules, policies and procedures, and when changes are made to the workplace safety manual.

A break in employment for any reason in excess of 30 days will be assessed for retraining needs at management's discretion.

Individual employees will be retrained after the occurrence of a work-related injury caused by an unsafe act or work practice, and when a supervisor observes employees displaying unsafe acts, practices, or behaviors.

Rules, Policies and Procedures

GRAHAM ROOFING SAFETY RULES, POLICIES, AND PROCEDURES

The safety rules contained on these pages have been prepared to protect you in your daily work. Employees are to follow these rules, review them often and use good common sense in carrying out assigned duties.

WORK AREA

Housekeeping:

1. Keep work areas, passageways, and stairs in and around buildings or other structure free of scrap lumber with protruding nails and all other debris.
2. Do not block or obstruct stairwells, exits or accesses to safety and emergency equipment such as fire extinguishers or fire alarms.
3. Do not store or leave items on stairways.
4. Combustible scrap and debris shall be removed at regular intervals during construction. Containers shall be provided with covers and labeled as to the content (i.e. oily rags, trash, metal...).
5. Keep floors clear of debris and other trip hazards.
6. Clean up spills/leaks immediately. Take corrective actions to eliminate the source of the spill leak.

Illumination:

1. Construction areas, aisles, stairs, ramps, runways, corridors, offices, shops, and storage areas where work is in progress shall be lighted with natural or artificial illumination to the standards set in CFR 1926.56.

Means of Egress:

1. Each building must have free and unobstructed egress from all parts while it is occupied.
2. A readily visible sign shall mark exits.
3. Any break in elevation must have steps for proper access/egress.

Potable water:

1. Potable water shall be provided in all places of employment, this is usually provided in water coolers with disposable cups and through water lines associated with existing local water supplies.
2. Water shall not be dipped from containers.
3. Container must be marked as to the nature of its contents and not used for any other purpose.
4. The common drinking cup is not allowed.
5. Cups must be kept in a sanitary container until use, and disposed of in the proper receptacle after use.

Toilet facilities:

1. Except as otherwise indicated in this section, toilet facilities, in toilet rooms separate for each sex, are provided in all places of employment. Where toilet rooms will be occupied by no more than one person at a time and can be locked from the inside, separate toilet rooms for each sex need not be provided.
2. The following will be used for setting up toilet facilities on site:

20 or less employees	1 toilet
20 or more	1 toilet seat and 1 urinal per 40 workers
200 or more	1 toilet seat and 1 urinal per 50 workers
3. This requirement does not apply to mobile crews or to normally unattended work locations so long as employees working at these locations have transportation.

WORK PRACTICES

Noise:

1. Hearing protection should be used whenever using power tools or the noise level is to a point that you must raise your voice to be heard from a distance of three feet or less.
2. When the noise level cannot be determined to be within the standards, hearing protection should be worn until a noise level test can be performed.
3. Plain cotton is not an acceptable protective hearing device.
4. Ear protective devices inserted in the ear shall be fitted or determined individually by a competent person. "Foamy Type" protection is self fitting and adequate for most applications.

Lead:

1. Any exposure to employees from lead or lead containing materials must be evaluated to ensure that employees are not over exposed.
2. A competent person must complete a hazard analysis of the work site to determine to what extent employee's exposure to lead will be and to ensure all requirements of OSHA Standard 29 CFR 1926.62 are met.

Personal Protective Equipment:

1. All employees must wear the appropriate PPE in all operations where there is an exposure to hazardous conditions or where the supervisor deems it necessary to reduce a potential hazard.
2. Graham Roofing employees must wear a hardhat any time they are exposed to overhead hazards, working on or around scaffolding or electrical shock protection.
3. Graham Roofing employees must wear eye protection during cutting, drilling, overhead activities or other times that potential hazards to the eye exist.
4. Gloves shall be worn when employees are exposed to hazards from cuts, abrasions electrical shock. Care must be taken to ensure the proper glove is used and that the wearing of the glove does not pose a potential hazard.
5. Respirators will not be worn until a medical evaluation; fit testing and training is done.
6. Employees are not allowed to bring their own PPE.

Fire Protection and Prevention:

1. All firefighting equipment shall be periodically inspected and maintained in an operable condition.
2. Access to firefighting equipment shall not be blocked at any time.
3. Travel from any point to the nearest fire extinguisher shall not exceed 100 feet.
4. Flammable or combustible liquids shall not be stored in areas used as exits, stairways, or normally used for the safe passage of people.
5. At least one fire extinguisher with a 20B rating shall be located not more than 10 feet from the door opening of any room used to store more than 60 gallons of flammable/combustible liquids.
6. At least one fire extinguisher with a 20B rating shall be located not less than 25 feet, nor more than 75 feet, from any flammable/combustible liquids stored outside.
7. At least one 20 ABC rated fire extinguisher shall be located on all tank trucks transporting/dispensing flammable/combustible liquids.
8. At least one 20 ABC rated fire extinguisher shall be located on the roof when work is being performed.
9. Approved safety cans with spark arrestors shall be used for handling flammable liquids in quantities of 5 gallons or more.
10. No more than 25 gallons of flammable/combustible liquids shall be stored in a room outside of an approved storage cabinet.
11. All roof related torching shall be performed according to NRCA/CERTA guidelines. See CERTA checklist at the end of this section.

Storage Trailers:

1. Should be level and stable before use.
2. Must be in good repair with no holes in the flooring or siding that may become a hazard to employees moving about within the trailer.
3. Trailer landings used as access/egress above 19 inches must be provided with steps that meet the stairway standard.
4. Any trailer with doors opening outwardly requires a platform and steps that meet the stairways standard.

Signs, Signals, and Barricades:

1. Accident prevention signs shall be used in the following manner:
 - a. Installed in the location of hazardous work
 - b. Danger signs shall be used where immediate hazard exists
 - c. Caution signs shall be used to warn against potential hazards
 - d. Exit signs shall have letters not less than 6 inches high.
2. Signaling/barricade (when work is exposing employee to traffic and/or adjacent to highway or street)
 - a. Always ask, "What is the drivers view", when setting up to signal traffic.
 - b. The following are four types of traffic control devices used:
 - i. Signs
 - ii. Channelizing devices
 - iii. Lighting devices
 - iv. Pavement markings
 - c. Signs are classified as:
 - i. Regulatory-impose legal restrictions
 - ii. Guide-show distances, destinations and directions
 - iii. Warning-give notice of hazardous conditions

- d. Flagmen shall be provided with and wear a red, orange or green high visibility safety warning garment while flagging.
- e. Signaling shall be done with an 18-inch minimum stop/slow paddle sign.
- f. Flags should only be used in an emergency situation, and they should be red 24"x24" flags mounted on a three foot shaft.
- g. Barricades must meet traffic manual standards.

Material Handling:

- 1. Materials shall be stacked as to prevent tipping, falling or overloading an area.
- 2. Aisles and passageways shall be kept clear.
- 3. Materials shall not be stored on scaffolds except for the materials needed for immediate use.
- 4. Used lumber shall have all nails withdrawn before stacking.
- 5. Lumber stacked manually shall not be more than 16 feet in height.
- 6. When using dockboards or bridge plates they shall be of adequate strength to hold the intended load.
- 7. Rigging equipment shall not be loaded more than its recommended safe workload.
- 8. When using wire rope, nylon rope, and synthetic fiber slings the tables in 1926.251 or manufacturer's tabulated data shall be used as a guide.
- 9. All solvent waste, oily rags and flammable liquids shall be kept in fire resistant covered containers until removed from the work area.

Tools – hand and power – always wear PPE during use:

- 1. Each employee is responsible for understanding the safe operation of each tool prior to use.
- 2. All tools shall be maintained in a safe condition.
- 3. All guards shall be attached and used on tools where they are designed and equipped.
- 4. All moving parts shall be guarded if exposed to contact by employees.
- 5. Switches shall not be altered or changed without manufacture approval.
- 6. Electrical power tools must be properly grounded.
- 7. Do not raise and lower electrical tools by the cord.
- 8. Pneumatic tools shall be secured to the air supply by a positive type means, which will ensure the connections stay together.
- 9. Manufacturer's operating instructions shall not be exceeded at any time.
- 10. Hydraulic power tools shall be operated at or below the manufacturer's recommended pressure, using only fire-resistant fluids.
- 11. Trained employees, whom have been certified in that particular tool, shall only operate power operated tools.
- 12. Never leave a loaded tool unattended.
- 13. Never use the tool in an explosive or flammable atmosphere.
- 14. Abrasive wheel tools shall be operated at the manufacturer's recommended speed only.
- 15. Guards must be in place and in working order.
- 16. Offhand grinders must have a work rest, with a maximum opening from rest to the wheel of no greater than 1/8".

Welding and Cutting – Always have a fire extinguisher with you during hot work

- 1. Compressed gas cylinders shall not be hoisted unless an appropriate cradle is used.
- 2. Cylinders must be used, stored and transported in the vertical position and secured to prevent tipping.
- 3. Oxygen must be stored 20 feet away from fuel gas cylinders or have a five-foot high barrier having a fire resistance of 30 min.

4. No cylinder shall be taken into a confined space.
5. A wrench/handle must be readily available to turn off cylinders in an emergency.
6. Hoses shall be in good working order and easily distinguishable from each other.
7. Torches and gauges must be in good working order.
8. Welding arc cable must be free of any splices or repairs for a minimum of 10 feet from the cable end to which the electrode holder is connected.
9. Grounding cables must be capable of carrying a safe current capacity equal to or greater than the specific maximum output.
10. Safe operating practices must be followed in accordance with 1926.351
11. If possible all welding shall be done outside.
12. Proper ventilation must be provided
13. A fire safety watch shall be posted to watch both sides of a weld for the possibility of fire during the hot work operation and for at least 30 minutes after the completion of work.
14. Precaution must be taken to protect employees from toxic gases created by cutting or welding preservative coatings.
15. Torches shall be lit by friction lighters or other approved devices and not by matches or from hot work.
16. No butane lighter shall be permitted during any type of hot work.

Electrical:

1. Only qualified persons may work on electrical equipment or live parts.
2. All live parts must be protected from accidental touching by doors, guards, barricades, and/or lock.
3. All temporary electrical lights must be guarded with protective covers.
4. All temporary wiring, including extension cords must be protected with Ground Fault Circuit Interruption protection (GFCI).
5. Extension cords shall be three-wire type and designed for hard or extra hard usage.
6. Flexible cords must be protected from damage (i.e. ductwork, sharp corners...).
7. Temporary lighting must be 8 feet from the floor.
8. Steps must be taken to ensure employees do not come into contact with overhead lines during crane, forklift, or man lift operations.

Lockout/tagout:

1. **IDENTIFY** the types of hazards you are dealing with (electric, hydraulic, etc.)
2. **ISOLATE** and block all sources
3. **LOCK AND TAG** – each employee must be represented during the lockout procedure, with the use of a distinctive type or color lock.
4. **VERIFY** energy has been released before starting work.
5. Before reactivating follow the steps listed:
 - a. **Inspect** area – verify all person, equipment, tools and materials have been accounted for and removed.
 - b. **Notify** all personnel.
 - c. **Remove** locks and tags – WARNING – only the person who installed the lock should remove the lock.

Scaffolds:

1. **A competent person must be present during any erecting, dismantling, moving or altering of a scaffold.**
2. Scaffolds shall be inspected by a competent person before each work shift, and after any occurrence, which could affect a scaffold's structural integrity. The scaffold checklist, at the end of this section, must be filled out daily by a competent person and kept on file.
3. Each working level of the scaffold must be fully planked.
4. All pins, braces and locks must be in place.
5. Never overload any point of a scaffold.
6. Never allow anyone on the braces of a scaffold for any reason.
7. 2x10 boards shall be used as mudsills under the base plates of all scaffolding, unless on solid footing.
8. Never use concrete blocks or bricks as foundation for scaffolding.
9. Fall protection must be used (usually guardrails) when the height of the scaffold reaches 10 feet.
10. Guardrail systems must consist of a top rail, midrail and toe boards.
11. All scaffolds must be guyed, tied, and braced in accordance with the manufacturing requirements.
12. An independent lifeline with a rope grab must be used while working from a suspended scaffold
13. An approved ladder must be available for access to the scaffold.
14. The proper distance from power lines must be maintained. The required distance can be derived from the tables in 1926.451.
15. Toe boards must be used to protect against falling objects from the scaffold.
16. Aerial lift operators must be trained and certified in the operation of the lift being used.
17. All operators must be tied off to the basket during operation; tying off in a scissors lift is not required nor recommended.
18. No one shall tie off to a structural member outside the lift basket.

Motor vehicles and mechanized equipment:

1. All equipment left unattended at night adjacent to highways or construction areas shall have lights, reflectors, and/or barricades to identify location of the equipment.
2. Operator personnel shall inspect all machinery and equipment prior to each use, and during use to make sure it is in safe operating condition.
3. Rated load capacities and recommended rules of operation shall be conspicuously posted on all equipment at the operator's station.
4. Wire rope with broken wires or evidence of wear, kinking, crushing, hoist caging or heat damage shall be taken out of service.
5. An accessible fire extinguisher of 5BC rating or higher shall be available at all operator stations.
6. When vehicles or mobile equipment are stopped or parked, parking brakes shall be set. Equipment parked on inclines shall have the wheels chocked as well as having the parking brakes set.
7. All vehicles or combinations of vehicles shall be checked at the beginning of each shift for safe operating condition of all mechanical and safety systems.
8. Maintain vehicles and equipment at specified intervals in accordance with the maintenance manual provided by the manufacturer. Vehicles are equipped with seat belts and are to be used by drivers and passengers when vehicle is in motion.
9. Operators shall not back up motorized equipment having an obstructed rear view unless the vehicle has an audible reverse signal alarm, or when an observer signals that it is safe to do so.

Excavation/trenching/shoring:

1. A competent person must be on site while employees are working in an excavation. An inspection by the competent person must be done and should be documented before work starts and any time conditions change.
2. All surface encumbrances must be removed or supported.
3. Underground utilities must be located and supported.
4. An adequate means of exit for excavations 4 feet or more in depth (ladders or steps) should be located within 25 feet of lateral travel.
5. Employees exposed to highway traffic must be protected by use of warning vest and/or barricades.
6. Hard hats must be worn while in the trench.
7. Spoil pile must be stored at least 2 feet or more from the edge of the excavation.
8. Warning system must be used for vehicles working in the area of the excavation to ensure they do not come too close to the trench.
9. An atmospheric check must be done before entering any manholes or trench that may be hazardous.
10. All water must be controlled or prevented from accumulating by use of removal equipment or diversion ditches. A competent person must monitor all means used.
11. Soil classification must be done prior to a protective system being developed, by the use of a "visual" and "manual" type test. No soil shall be classified as stable rock or "A" type soil due to the vibration encountered during digging and the normal fissures found in rock and soil.
12. "B" type soils can be sloped/benched to a maximum slope of 1:1
13. "C" type soils can only be sloped, benching is not allowed. The maximum slope is 1 ½: (34 degrees).
14. A trench box can be used in accordance to the tabulated data for each box with the following stipulations:
 - a. Maximum allowable slope shall start 18" below the top of the trench box.
 - b. The bottom of the trench box must be no more than 24" from the bottom of the trench.
 - c. Tabulated data sheet for the box must be on site when putting the trench box together.
15. All protective system used shall be in accordance with appendix to subpart P of the 1926 standards.
16. All excavations twenty-feet deep or more must have a registered professional engineers approved design in place before employees are allowed to work in the excavation.
17. All open holes, wells, and trenches should be back filled as soon as possible; any left open must be barricaded.

Stairways and ladders:

1. A stairway or ladder must be provided at access points that have 19" break in elevation.
2. A double cleat ladder must be used when more than 25 employees are using ladders for access/egress from the working area.
3. A clear passage for employees access/egress must be provided at all times.
4. All stairs four risers high must have the following:
 - a. At least one handrail
 - b. One stair rail system along each unprotected side or edge
 - c. Unprotected sides and edges of stairway landings must be protected by use of guardrails.
5. Ladders shall be used only for the purpose for which they were designed.

6. Stepladders shall not be used as extension ladders; they must be unfolded and locked in place before use.
7. Never stand on or above the top rung of a stepladder.
8. Never attempt to move a ladder while you are on it.
9. Never use a ladder as a walk board.
10. Ladders must be inspected prior to each use.
11. Tag and discard damaged ladders, do not attempt to repair a ladder.
12. Do not use an aluminum ladder when there is a chance of coming in contact with electricity.
13. Non-self supporting ladders must meet the following guidelines:
 - a. Be placed one foot away from the building for every four foot of height
 - b. Extend three feet above the landing to which the employee is trying to reach.
 - c. Must be tied off
 - d. Must be used on a level foundation, with a brace board to prevent kick out if necessary.
14. All job built ladders shall meet the following standards:
 - a. Be placed one foot away from the structure for every eight feet of height.
 - b. Be built no longer than 30 feet.
 - c. Shall not be painted.
 - d. Must be constructed according to structural design practices.
 - e. Must consist of side rails, rungs, and filler blocks between the rungs.
 - f. Shall not have any protruding nail heads.
 - g. Must be secured at top and bottom before use.

Demolition:

1. A competent person to determine structure condition of the building being worked on along with any adjacent structures must do an engineering survey prior to starting operations dealing with demolition.
2. All utilities must be controlled and the utility company notified.
3. All electric, gas water, steam, sewer, and other service lines that have to be set up for temporary use must be relocated and protected and needed.
4. An assessment of all other possible hazards must be done and corrective action taken prior to commencement of work.
5. Access ways shall be entirely closed with the exception of those designed as a means of access/egress.
6. A competent person must periodically inspect all stairs/ladders.
7. Chutes shall be used for debris removal with the area adjacent barricaded for safety.
8. Where wheel barrels are used to dump material a bumper no less than 4" thick and 6" tall shall be installed at each chute.
9. Each chute must have a guardrail for fall protection, which is at least 42" high.
10. No material shall be allowed to land on floors in masses as to exceed the safe carrying capacities of the floors.
11. When using mechanical or explosive demolition techniques, the technique used must be in compliance with 1926.860.
12. Demolition of floor arches shall not be started until they, and the surrounding floor area for distance of 20 feet, have been cleared of debris and any other unnecessary materials.
13. When floor arches have been removed, planking in accordance with CFR 1926.855(b) shall be provided for the workers engaged in raising the steel framing.

14. Cranes, derricks, and other hoisting equipment used shall meet the requirements specified in Subpart N of this part.
15. Steel construction shall be dismantled column length by column length, and tier by tier (columns may be in two-story lengths).
16. Any structural member being dismembered shall not be overstressed.

Rollover Protective Structures and Overhead Protection (ROPS):

1. All heavy equipment must have ROPS in place before use.
2. Any modification to the ROPS must be up to or higher standards than the original design.
3. All ROPS must meet the requirements as set in 1926.1001.
4. **SEATBELTS ARE REQUIRED USE ON ANY EQUIPMENT THAT HAS ROPS.**

Site safety inspection:

If OSHA, an insurance company representative, Fortier Loss Control Consultant or an owner representative approaches you on a jobsite, be courteous at all times and refer them to the job foreman. The foreman needs to make sure the home office knows of any OSHA visits immediately.

The following checklists should be used by the onsite supervisor to insure hazards do not go unnoticed. This report should be kept on file by the supervisor.

See Job-Site Checklist:

JobSite Checklist

Job:		Date:	
Location:			
Foreman:	Inspection Completed by: _____		

Job Set Up

Acceptable			Personal Protective Equipment	Comments
N/A	Yes	No		
			Hard Hat	
			Safety glasses	
			Hearing protection	
			Steel toed boots	
			Gloves	
			Tyvek suits for asbestos jobs	
			Respirators for asbestos jobs	
			Other: _____	

Acceptable			Miscellaneous	Comments
N/A	Yes	No		
			MSDS Sheets on jobsite	
			First aid kit on jobsite	
			Porta john	
			Dumpster	
			Trash chute	
			Other: _____	

Ground Operations

Acceptable			Crane	Comments
N/A	Yes	No		
			Warning lines	
			Hard hat	
			Safety glasses	
			Safety latch	
			Other _____	

Acceptable			Kettle and Pipes	Comments
N/A	Yes	No		
			PPE: Face shield	
			Safety glasses	
			Leather gloves with snug cuffs	
			Long sleeve shirt / cuffs over gloves	
			Heavy work boots	
			Long pants / cuffs over top of boots	
			Guard rails 4' both sides of pipe on roof	

Acceptable				Comments
N/A	Yes	No		
			Safety / warning lines	
			Fire extinguisher on ground (ABC)	
			Wheels chocked	
			Propane at safe distance from building / kettle	
			Pipes at safe distance from building / kettle	
			Pipes supported if needed	
			Pipes tied off	
			Other _____	

Roof Operations				
Acceptable			Roof Operations	Comments
N/A	Yes	No		
			Ladder in good condition	
			Ladder tied off	
			Ladder at safe distance from building	
			Ladder 3' above roof	
			Fire extinguisher on roof (ABC)	
			Electrical cords in good condition	
			Electrical wires on / near roof	
			Openings in roof	
			Good housekeeping	
			Decking condition	
			Other _____	

Acceptable			Fall Protection	Comments
N/A	Yes	No		
			Safety Monitor _____	
			Guard rail system	
			Warning lines	
			Safety belts and lanyards	
			Other _____	

Acceptable			Hot Lugger and Mop Carts	Comments
N/A	Yes	No		
			Long sleeve shirts / cuffs over gloves	
			Gloves with snug cuffs	
			Buckets 3/4 full	
			Chock wheels on lugger when loading	
			Clear path to loading area	
			Clean wheels	
			Other _____	

Medical Services and First Aid Procedures

MEDICAL SERVICES AND FIRST AID PROCEDURES

Medical Services

1. Locate the nearest medical services to the site for use during emergencies.
2. Ensure an adequate number of 1st aid/CPR certified personnel assigned to the site (at least one certified employee for every 25 employees on site).
3. Ensure an adequately stocked 1st aid kit is on site and available to all employees.

Emergency Phone Numbers – Must be posted at or near all phones

Minor First Aid Treatment

1. Inform your supervisor/home office.
1. Administer first aid treatment to the injury or wound.
2. Access to a first aid kit is not intended to be a substitute for medical attention.
3. Provide details for the completion of the accident investigation report.

Non-Emergency Medical Treatment

For non-emergency work-related injuries requiring professional medical assistance, management must first authorize treatment. If you sustain an injury requiring treatment other than first aid:

1. Inform your supervisor.
2. Proceed to the posted medical facility. Your supervisor will assist with transportation, if necessary.
3. Provide details for the completion of the accident investigation report.
4. Fill out Employer's Authorization for Examination or Treatment form.

Emergency Medical Treatment

If you sustain a severe injury requiring emergency treatment:

1. Call for help and seek assistance from a co-worker.
2. Use the emergency telephone numbers and instruction posted next to the telephone in your work area to request assistance and transportation to the local hospital emergency room.
3. Provide details for the completion of the accident investigation report.

First Aid Training-Each employee must receive training and instructions from his or her supervisor on proper first aid procedures. All responders are responsible for activating the Emergency Medical System, and performing the level of care they have been trained and feel comfortable with.

Medical Treatment-Each employee shall be given the following form when seeking medical treatment. Going to a doctor not on the list may result in the employee being responsible for payment.

available to the employee

GRAHAM ROOFING

INCIDENT/INJURY INVESTIGATION, REPORTING AND RECORDS

Purpose-Incident/Injury investigation is carried out to determine the cause of an unacceptable happening so that appropriate actions can be taken to prevent a reoccurrence. Remember, the purpose of this investigation is fact finding, not fault finding.

Responsibility-The Supervisor is responsible for investigation of all incidents/injuries occurring on his/her jobsite and for corrective measures necessary to prevent reoccurrence. The supervisor is responsible for reviewing the facts of the person that conducted the investigation and seeing that the corrective measures required are put into effect.

General procedures for all accidents:

1. Provide immediate first aid or medical care for the injured.
2. Report all incidents to the Graham Roofing office in order to make a determination if a follow up investigation needs to be done.
3. Any incident that results in injury or property damage will require a meeting to be scheduled with management to insure proper follow up action is taken.

Employee accidents on the jobsite:

1. The supervisor should initiate his investigation as soon as possible using the accident/incident investigation form.
2. All witnesses and the victim (if possible) should be interviewed as soon as possible. Interviews should be done individually, not as a group. Written statements should be taken if deemed appropriate.
3. Corrective measures should be implemented immediately.

Vehicle Accidents:

1. Contact the police if on a public road.
2. Gather necessary data as required to complete the forms contained in the glove compartment
3. Ascertain to what doctor or hospital the injured parties may have been taken.
4. Contact main office immediately.
5. Submit the written report as soon as possible (always on the same day as the accident).
6. Never make or allow anyone else to make a statement admitting liability or responsibility. This could compromise your insurance coverage.
7. Public Liability (accidents involving non-employees)
8. Call an ambulance if needed.
9. Call the police.
10. Contact project supervisor
11. Get names and phone numbers of witnesses.
12. Draw diagrams, take photos, or gather any other pertinent information.
13. Get written or taped statements from witnesses (facts tend to change if these statements are not taken immediately).

14. MAKE NO STATEMENT TO MEDIA. Refer to main office.

GRAHAM ROOFING SERIOUS/FATAL ACCIDENT PROCEDURES

1. Check conditions at the scene and secure the area. Rope off area as soon as the ambulance leaves.
2. If the police did not respond with the ambulance, call them. They will have to conduct a homicide investigation if a fatality has occurred.
3. Contact the office and tell them what happened.
4. Contact Fortier Loss Control. They will conduct a formal accident investigation as soon as possible. They will also assist you in dealing with OSHA.
5. Check with police about notifying next of kin. They may do this for you. Check to see if the deceased has a relative or close friend on the job that might assist with the notification.
6. Send someone to the gate to prevent media and other spectators from entering the company premises. Do not allow reporters onto the property until the company is ready to provide a statement. Be pleasant but firm!
7. Establish two files, one for your records and one for the OSHA inspector. The files should contain:
 - a. The victim's application for employment.
 - b. A copy of all safety meetings conducted in the victim's department.
 - c. A copy of the company safety program.
 - d. A copy of your OSHA 300 form.
 - e. Inspection/maintenance records on any equipment involved in the accident.
 - f. Photographs of the entire scene.
 - g. Handwritten statements from witnesses. (Do not put these in the OSHA file; the inspector will conduct his own interviews.)
 - h. Notify OSHA or the State Occupational Safety and Health office. Document the call, noting the time and the name of the person that you spoke with. Remember that this must be done within 8 hours of the time of the accident.

EMPLOYEE'S CHOICE OF PHYSICIAN

It is a crime to knowingly provide false, incomplete or misleading information to any party to a workers' compensation transaction for the purpose of committing fraud. Penalties include imprisonment, fines and denial of insurance benefits.

State File Number: _____ Date of Injury: _____
Employee: _____ SSN: _____
Address: _____ City: _____ State: _____ Zip: _____
Employer: Graham Roofing FEIN: _____
Address: 769 West Tibbee Road City: West Point State: MS Zip: 39773

PANEL OF PHYSICIANS

The employer should offer a panel of three physicians to the injured employee. If the injury is a back injury the panel must be expanded to four, one of whom must be a chiropractor. Chiropractor visits are limited to 12 visits per back injury. The injured employee must select a physician from the panel.

Physicians Name: Baptist Memorial Hospital Phone: (662) 244-1000
Address: 2520 5th Street North City: Columbus State: MS Zip: 39705
Is Physician a Specialist? Yes No If yes, give specialty: Ortho, Neuro, Chiro, etc.
Physicians Name: Family Med Center Phone: (662) 328-9623
Address: 1503 Highway 45 North City: Columbus State: MS Zip: 39705
Is Physician a Specialist? Yes No If yes, give specialty: Ortho, Neuro, Chiro, etc.
Physicians Name: North Mississippi Medical Center Phone: (662) 495-2300
Address: 835 Medical Center Drive City: West Point State: MS Zip: 39773
Is Physician a Specialist? Yes No If yes, give specialty: Ortho, Neuro, Chiro, etc.
Physicians Name: North MS Medical Center Phone: (662) 377-3000
Address: 830 South Gloster City: Tupelo State: MS Zip: 38804
Is Physician a Specialist? Yes No If yes, give specialty: Ortho, Neuro, Chiro, etc.
Physicians Name: The Clinic @ Elm Lake Phone: 662/240-9999
Address: 3700 North Frontage Road City: Columbus State: MS Zip: 39701
Is Physician a Specialist? Yes No If yes, give specialty: Ortho, Neuro, Chiro, etc.

I hereby have selected the following physician from the list provided to me by my employer:

Physician Chosen: _____

Employee Signature: _____ Date Selected: _____

A copy of this form must be provided to the employee. The employer must keep the original form on file and upon request provide a copy to the Division of Workers' Compensation.

**GRAHAM ROOFING
ACCIDENT/INCIDENT INVESTIGATION**

INJURED _____ JOB# / NAME _____

INJURY DATE _____ TIME _____ AGE _____ SS# _____

OCCUPATION _____ MARRIED _____

DATE EMPLOYED _____

DESCRIPTION OF ACCIDENT/INCIDENT (include material damage, if any):

WITNESSES _____

TIME INJURED LEFT WORK _____ TIME&DATE RETURNED _____

DESCRIBE ANY UNSAFE ACTS OR CONDITIONS _____

WHAT CAN BE DONE TO PREVENT SIMILAR INCIDENTS (must be filled out):

MEDICAL FACILITY USED _____

Supervisor's signature

Date

I was offered medical treatment but elected not to accept it.

Employee's signature

Witness' signature

GRAHAM ROOFING
BLOODBORNE PATHOGENS
EXPOSURE CONTROL PLAN/TRAINING

Bloodborne Pathogens are microorganisms that can be found in blood and other body fluids that can cause disease in humans. The most common of these are Hepatitis B Virus (HBV) and Human Immunodeficiency Virus (HIV or AIDS).

Exposure to bloodborne pathogens may occur in many ways. Some of the most common ways are needle stick injuries, transfusions with contaminated blood and having sex with an infected partner. In order to protect oneself from bloodborne pathogens, the concept of universal precautions has been developed. This simply means that all blood or body fluids will be considered contaminated and anyone being exposed to these fluids (such as first aid providers) will wear protective clothing to prevent accidental contamination. This protective clothing will include latex gloves, safety glasses and possible face shields as protective outerwear. Spills of blood or body fluids must be disposed of properly. A freshly mixed solution of bleach (Clorox or other laundry bleach) and water, mixed in a proportion between 1:10 and 1:100 should be poured on the spill. After a few minutes the spill can be safely wiped up (wearing protective clothing). Materials used to clean up the spill should be placed in a plastic bag marked "BIOHAZARD". A licensed medical waste hauler must be utilized to dispose of this material. An appropriate disposal company can be located by calling a local hospital and asking who they use.

- **TO PREVENT TRANSMISSION:**

1. Avoid contact with body fluids when possible.
2. Place barriers such as disposable gloves or a clean dry cloth between the victim's body fluids and yourself.
3. Wear protective clothing such as disposable gloves to cover any cuts, scrapes and skin conditions that you may have.
4. Wash your hands with soap and water immediately after giving care.
5. Do not eat, drink or touch your mouth, nose or eyes when giving first aid.
6. Do not touch objects that may be soiled with blood.
7. Be prepared by having a properly stocked first aid kit available.

- **TO CLEAN UP SPILLS:**

1. Wear protective clothing.
2. Soak up area with bleach (1:10 – 1:100 bleach to water).
3. Clean up spill.
4. Put clean up materials in plastic bag marked "BIOHAZARD".
5. Dispose of cleanup materials using licensed medical waste disposal company.
6. Anyone who has been exposed to body fluids in the course of their employment is entitled to medical screening and treatment at no cost. If you have received an exposure notify your supervisor at once. All screening and treatment will be handled confidentially.

- **TRAINING** – Training on this topic is required upon initial assignment and annually, or as deemed necessary by management or medical personnel.

Fall Protection Program

GRAHAM ROOFING FALL PROTECTION PROGRAM

Purpose: To eliminate accidents or injuries as a result of falls in the work place.

Scope: Due to the inherent dangers of the work performed by this company, of which many are fall hazards, it was determined that a fall protection program must be developed. This has been done to help reduce the number of hazards each employee is exposed to and to ensure each employee understands the dangers posed by falls and how to react to each hazard. Each employee must agree to conform to the program to continue or start work for this company. Failure to do could result in retraining, warning or disciplinary action up to and including termination.

Management: The management of this company knows and understands the challenges imposed at times of using conventional fall protection systems; however at no time will you construe this understanding as permission to not be 100% protected from fall hazards while on the job. The full compliance to the fall protection standard and our company policy on the issue will be upheld and enforced.

Supervisors: The on site supervisor will be responsible for ensuring that every aspect of the fall protection program is enforced within his/her area of responsibility. Any deviation from the program will result in stoppage of work and notifying management as to any problems.

Employees: All employees are responsible for reading, studying and complying with the fall protection program. All employees have the right to stop and raise questions of safety at any time and are encouraged to do so. Concerns can be delivered to their supervisor, Fortier Loss Control, or any other person within the management chain. No employee shall have any negative repercussions brought upon him/her for raising safety issues. It also must be understood that failure to comply with the fall protection program may result in disciplinary action as stated in the upper portion of this letter.

Please understand that your safety is the issue; it is the intent of this company to ensure you have a safe workplace free from recognizable hazards. This can only be accomplished with an avenue of communication between each member of this company.

Bobby Hooks, President
Graham Roofing

Employee Signature

Date

GRAHAM ROOFING FALL PROTECTION TRAINING PROGRAM

The fall protection requirements for all sites are listed below. At no time will the minimum fall protection requirement be less than that of 29 CFR 1926.500, 501, 502 and 503 which are the OSHA standards dealing with fall protection. No deviation from this plan will be allowed without the approval of Bobby Hooks or his representative.

A safety meeting will be held before the start of work when employees are to be exposed to a fall hazard. The purpose of the meetings is to ensure every member of the team is properly trained in the use of the fall system that will be used and that all fall hazards are identified. The scope of the work shall be discussed and any questions must be answered before proceeding with work in an area that fall hazards exist.

Fall protection shall be provided for all employees exposed to a fall of six feet or more to a lower surface. The following methods shall be used to protect employees whenever the elimination of the fall hazard is impossible.

1. Guardrail System
 - a. Shall consist of a top rail (42" high), a midrail (midway from top to bottom), and a toeboard.
 - b. Must be able to withstand 200 lbs. of force in an outward and downward motion.
 - c. Shall be inspected and repaired on a daily basis.
 - d. No steel or plastic banding shall be used as guardrails.
 - e. When wire rope is used as a guardrail it must be flagged every 6 feet.
2. Safety net system
 - a. Shall be installed as close to the surface as possible, but never more than 30 feet below any surface.
 - b. They must extend outward from the work in accordance with 1926.502(c) (2)
 - c. Must be capable of absorbing the intended load.
 - d. A competent person shall inspect safety nets and defective nets replaced on a daily/as needed basis.
3. Personal fall arrest system
 - a. Dee-rings and snap hooks shall have a minimum tensile strength of 5,000 lbs.
 - b. Snap hooks must be a locking type to prevent roll out.
 - c. Anchorage points must be capable of supporting at least 5,000 lbs.
 - d. System must be rigged so not to allow a free fall of more than 6 feet or contact with any lower surface.
 - e. System shall be inspected prior to each use with any defective component replaced.
 - f. The harness shall be worn as per the manufacture's recommendation only.
 - g. The harness must fit the employee properly and be adjusted for a "snug" fit
4. Lifelines
 - a. Shall be used only under the direct supervision of a qualified person.
 - b. Only locking type snap hooks shall be used in any part of a fall protection system.
 - c. No more than one employee shall be attached to a vertical lifeline at any one time.

- d. Lifelines must be protected from being cut or abraded.
- 5. Warning Line System – **allowed for roofing activities only.**
 - a. Shall be erected around all sides of the roof work.
 - b. Must be 6 feet back from the roof edge.
 - c. Access points to the roof area must be formed by the use of two warning lines.
 - d. Must be flagged at not more than 6 foot intervals.
 - e. Must resist a tipping pressure of 16 lbs. on the line and it must be at least 30 inches above the walking surface.
 - f. Lines must have a minimum tensile strength of 500 lbs.
 - g. No employee shall be allowed between the warning line and the roof edge without personal fall protection unless using a safety monitor and warning lines.
- 6. Controlled access zones
 - a. Shall be defined by a control line or other means of restriction.
 - b. Shall be erected not less than 6 feet but not more than 25 feet from the protected edge.
 - c. Each line must be clearly flagged or marked every 6 feet.
 - d. Each line must be at least 39” but not more than 45” from the deck.
 - e. Each line shall have a minimum breaking strength of 200 lbs.
- 7. Safety Monitoring System
 - a. May only be used on low-sloped roofs.
 - b. Safety monitor must be a competent person and designated by the supervisor.
 - c. Must warn employees of impending hazards
 - d. Shall be on the same working level as the employees.
 - e. Must not have any duties, which could interfere with the safety of the employees.
 - f. Must be close enough to communicate verbally with the employees.
 - g. Each employee must comply with the warnings issued by the monitor without question.
- 8. Covers
 - a. Must be installed on all openings including skylights.
 - b. Must be secured.
 - c. Must have the word “cover”/”hole” painted on it.
 - d. Must be capable of supporting at least twice the intended load.

All training will be documented and recorded in the company office. Each newly assigned employee must receive documented training in the following before being allowed to work on any Graham Roofing jobsite.

- 1. The company fall protection program and CFR 1926.500 Subpart M.
- 2. The employee’s role within the fall protection program.
- 3. The use of personal fall protection equipment
 - a. Full body harness
 - b. Locking type snap hook
 - c. Lanyard and deceleration device
 - d. Anchorage points
- 4. The nature of fall hazards.
- 5. The correct handling and storage of fall protection equipment.
- 6. Each area of responsibility within the fall protection program.

No written plan can cover every type of fall hazard crews within this company may encounter, therefore; anytime a question of fall protection and/or systems being used arise each employee must voice their questions or concerns. This can and must be done by any or all of the following:

1. Notify the on site supervisor – this should be the first line of communication
2. Call the GRAHAM ROOFING Office at 662-492-9555
3. Call Fortier Loss Control Consultants, inc. at 901-388-3519

**GRAHAM ROOFING
SITE SPECIFIC
FALL PROTECTION PROGRAM**

Company

Graham Roofing
769 West Tibbee Road
West Point, Mississippi 39773

This Fall Protection Plan is specific for the following project:

Plan prepared or modified by:

Plan approved by: Bobby Hooks, President

Signature & Date: _____

Plan supervised by:

Statement of Company Policy

Graham Roofing, Incorporated is dedicated to the protection of its employees from on-the-job injuries. All employees of Graham Roofing, Incorporated have the responsibility to work safely on the job.

The purpose of this plan is to:

- Supplement our standard safety policy by providing safety standards specifically designed to cover fall protection on this job; and
- Ensure that each employee is trained and made aware of the safety provisions that are to be implemented by this plan before the start of the job.

This Fall Protection Plan addresses the use of other-than-conventional fall protection at a number of areas on the project and identifies specific activities that require non-conventional means of fall protection. These areas include:

- Leading Edge Work

This plan is designed to enable employers and employees to recognize the fall hazards on this job and to establish the procedures that are to be followed in order to prevent falls to lower levels or through holes and openings in walking/ working surfaces.

Each employee will be trained in these procedures and will strictly adhere to them except when doing so would expose the employee to a greater hazard. If, in the employee's opinion, this is the case, the employee is to notify the foreman of the concern and have it addressed before proceeding.

Safety policy and procedure on any one project cannot be administered, implemented, monitored, and enforced by anyone individual. The total objective of a safe, accident free work environment can be accomplished only by a dedicated, concerted effort by every individual involved with the project from management down to the last employee.

Each employee must understand their value to the company; the costs of accidents -monetary, physical, and emotional; the objectives of the safety policy and procedures; and what each individual's role is in administering, implementing, monitoring and complying with the safety policy and procedures. This allows for a more personal approach to compliance through planning, training, understanding, and cooperative effort, rather than by strict enforcement. If for any reason an unsafe act persists, strict enforcement will be implemented.

It is the responsibility of the **General Superintendent** to implement this Fall Protection Plan. **The Job Foreman and/or Safety Officer** is responsible for observational safety checks of work operations and enforcement of the safety policy and procedures.

The job foreman also is responsible for correcting any unsafe acts or conditions immediately. It is the responsibility of each employee to understand and adhere to the procedures of this plan and to follow the instructions of the foreman. It is also the responsibility of employees to bring to management's attention any unsafe or hazardous conditions or acts that may cause injury to either themselves or any other employee.

Any changes to this Fall Protection Plan must be approved by Bobby Hooks.

Fall Protection Systems to be used on this project

Where conventional fall protection is unfeasible or creates a greater hazard at the roof edge and during roof installation, we plan to do this work using a warning line and safety monitoring system and expose only a minimum number of employees for the time necessary to actually accomplish the job.

Only individuals with the appropriate experience, skill, and training will be authorized as designated personnel. All employees who will be working as designated personnel under the safety monitoring system will have been trained and instructed in the following areas:

- Recognition of the fall hazards in the work area (at the roof edge and in the roof area)
- Avoidance of fall hazards using established work practices that have been made known to the employees
- Recognition of unsafe practices or working conditions that could lead to a fall, such as windy conditions
- The function, use, and operation of safety monitoring systems, guardrail system, body belt/harness systems, control zones, and other protection to be used.
- The correct procedure for erecting, maintaining, dismantling and inspecting the systems to be used
- Knowledge of construction sequence

Before the start of work, a conference involving all members of the construction crew, crane crew, and supervisors of any other concerned contractors will take place. The supervisor in charge of the project will conduct this conference. During the conference, procedures and sequences pertinent to this job will be thoroughly discussed and safety practices to be used throughout the project will be specified. Further, all personnel will be informed that the controlled access zones are off limits to all personnel other than those designated personnel specifically trained to work in those areas.

Safety Monitoring System

A safety monitoring system means a fall protection system in which a competent person is responsible for recognizing and warning employees of fall hazards. The duties of the safety monitor are to:

- Warn by voice someone approaching the open edge in an unsafe manner
- Warn by voice if there is a dangerous situation developing that cannot be seen by another person
- Make the designated personnel aware they are in a dangerous area
- Be competent in recognizing fall hazards
- Warn employees when they appear to be unaware of a fall hazard or are acting in an unsafe manner
- Be on the same walking/working surface as the monitored employees and within visual sighting distance of the monitored employees
- Not allow other responsibilities to encumber monitoring. If the safety monitor becomes too encumbered with other responsibilities, the monitor will:
 - Stop the roofing process, or
 - Turn over other responsibilities to a designated roofer, or
 - turn over the safety monitoring function to another designated, competent person.

The safety monitoring system will not be used when the wind is strong enough to cause crane loads to swing out of radius, or to result in loss of control of the load, or when weather conditions cause the walking/working surfaces to become icy or slippery.

Control Zone System

A controlled access zone means an area designated and clearly marked in which roof edge work may take place without the use of guardrail, safety net, or personal fall arrest system to protect the employees in the area. Control zone systems will comply with the following provisions:

1. When used to control access to areas where roof edge work and other operations are taking place the controlled access zone will be defined by a control line or by any other means that restricts access. When control lines are used, they will be erected to less than 6 feet from the roof edge.
2. The control line will extend along the entire length of the unprotected area or roof edge and will be approximately parallel to the unprotected area of roof edge.
3. The control line will be connected on each side to a guardrail system or wall.
4. Control lines will consist of ropes, wires, tape, or equivalent materials and supporting stanchions as follows:

- Each line will be flagged or otherwise clearly marked at not more than 6 foot intervals with high-visibility material
- Each line will be rigged and supported in such a way that its lowest point (including sag) is not less than 39 inches from the walking/working surface and its highest point is not more than 45 inches from the walking/working surface
- Each line will have a minimum breaking strength of 500 lbs

Holes

All openings greater than 2 inches in its least dimension will have perimeter guarding or covering. Before holes are cut in the roof, proper protection for the holes must be provided to protect the workers. All covers must be securely installed to prevent accidental displacement by the wind, equipment or employees. All covers must be color coded or marked with the word "HOLE" to warn of the hazard. Perimeter guarding or covers will not be removed without the approval of the job foreman.

Implementation of Fall Protection Plan

The structure being worked on is a ____ story building. The following is a list of the roof situations on this job:

Roof Edge

The fall protection for workers at the edge will be assured by a properly constructed and maintained warning line not more than 6 feet away from the edge supplemented by a safety monitoring system to ensure the safety of all roofers working within the area.

Roof Area

Employees who are more than six feet from an unprotected edge, as defined by the warning lines, do not require fall protection, but a warning line must be erected to remind employees they are approaching an area where fall protection is required.

Conventional Fall Protection Systems Considered for the Roofing Area and Edge Operations

The following is a list and explanation of fall protection measures available and an explanation of limitations for use on this particular job site. If during the course of the roofing work an employee sees an area that could be erected more safely by the use of one of these fall protection measures, the foreman should be notified.

Personal Fall Arrest Systems

In this particular job, personal fall arrest systems requiring body belt/harness systems, lifelines, and lanyards will not reduce possible hazards to workers and will create offsetting hazards during their usage at the roof edge.

Roof edge work is conducted by employees who are specifically trained to do this type of work and who are trained to recognize the fall hazards. The nature of such work normally exposes the employee to the fall hazard for a short period of time, and installation of fall protection systems for a short duration is not feasible because it exposes the installers of the system to the same fall hazard, but for a longer period of time.

Other reasons this system was not used on this particular job:

1. It is necessary that the employee be able to move freely without encumbrance. Having lifelines attached would restrict the employee's ability to move about the work area.
2. A typical procedure requires two or more workers to maneuver around each other. If they are each attached to a lifeline, part of their attention must be diverted from their main task to the task of avoiding entanglements of their lifelines or avoiding tripping over lanyards. Therefore, if these workers are attached to lanyards, more fall potential would result than from not using such a device.

In this specific case, retractable lifelines do not solve the problem of two workers becoming tangled. In fact, such a tangle could prevent the lifeline from retracting as the worker moved, thus exposing the worker to a fall greater than six feet. Also, a worker crossing over the lifeline of another worker can create a hazard because the movement of one person can unbalance the other.

In the event of a fall by one person, there is a likelihood that the other person will fall as well. In addition, if contaminations such as roofing cement or material enter the retractable housing, it can cause excessive wear and damage to the device and could clog the retracting mechanism.

3. An employee tied to a lifeline can be trapped and crushed by moving loads from cranes if the employee becomes restrained by the lanyard or retractable lifeline and cannot get out of the path of the moving load.

The sudden movement of materials being raised by a crane can be caused by a number of factors. When this happens, the employee may immediately have to move a considerable distance to avoid injury. If a tied-off body belt / harness is being used, the employee could be trapped. Therefore, there is a greater risk of injury if the employee is tied to the structure for the specific procedure.

When necessary to move away from a retractable device, the worker cannot move at a rate greater than the device locking speed. When moving toward the device, it is necessary to move at a rate that does not permit cable slack to build up. This slack may cause cable retraction acceleration and cause a worker to lose balance by applying a higher than normal jerking force on the body when the cable suddenly becomes taut after building up momentum. This slack can also cause damage to the internal spring-loaded drum, uneven coiling of cable on the drum, and possible cable damage.

The factors causing sudden movements may include:

Cranes

- Operator error
- Site conditions (soft or unstable ground)
- Mechanical failure
- Structural failure
- Rigging failure
- Crane signal/radio communication failure

Weather conditions

- Strong or sudden gusting wind
- Cold, causing slowed reactions or mechanical problems
- Snow/rain (visibility)

Human error

- Incorrect or misunderstood crane signals
- Misjudged elevation, speed or angle of load

4. Attachment points for this system will require removal or patching. In order to remove or patch these points, the employee must be exposed to an additional fall hazard at an unprotected perimeter.
5. Providing attachment at a point above the walking/working surface would also create fall exposures for employees installing the devices.
6. Temporary structural supports, installed to provide attachment points for lifelines, limit the space that is essential for the roofing process. To keep the lanyards at a reasonable and manageable length, lifeline supports would need to be in close proximity to the work area. The time in man-hours that would be required to place and maintain temporary structural supports for lifeline attachment would exceed the number of man-hours involved in installing the roof system. No protection could be provided for the employees erecting the temporary structural supports and these supports would have to be moved during each phase of the roofing process, thus greatly increasing the employee's exposure to the fall hazard.
7. The competent person, who has taken into account the specialized operations being performed on this project, should determine when and where a designated roofer couldn't use a personal fall arrest system.

Safety Net Systems

The nature of this particular project prevents the use of safety nets where edge work may take place because of the following reasons:

1. To install safety nets around the perimeter of the building poses attachment problems. Structural members do not exist to which supporting devices for nets can be attached in the area where protection is required.
2. As work advances, the locations of edge work changes constantly. This would require the installation and dismantling of safety nets repeatedly through the normal workday.
3. The exposure time for the worker installing the safety net would be far longer than for the workers whom the net is intended to protect.

Guardrail Systems

On this particular jobsite, guardrails, barricades, ropes, cables or other perimeter guarding devices or methods will pose problems to safe working conditions because of the following reasons:

1. The erector of the system will be exposed to a fall hazard for a longer period of time while installing and removing perimeter protection than while installing the roofing system.
2. Compliance with the standard would require a guardrail and toe board to be installed along this edge. Employees would have to work through the guardrail to complete the required work. The guardrail would not protect an employee who must lean through it to do the necessary; rather, it would hinder the employee to such a degree that a greater hazard is created than if the guardrail were absent.
3. Guardrail requirements pose a hazard by creating the possibility of employees being caught between guardrails and suspended loads from cranes.

Scaffolds

Scaffolds were not used on this particular project because of the following reasons:

1. The work edge of the building is constantly changing and the scaffolding would have to be moved at very frequent intervals. Employees erecting and dismantling the scaffolding would be exposed to fall hazards for a greater length of time than they would by merely completing the work required.
2. A scaffold tower could interfere with the safe swinging of a load by the crane.
3. Power lines, terrain, and site do not allow for the safe use of scaffolding.

Vehicle-Mounted Platforms

Vehicle-mounted platforms are not used for the following reasons:

1. A vehicle-mounted platform will not reach all areas.
2. The edge of the building is over a lower building level and this lower level will not support the weight of a vehicle-mounted platform.
3. A vehicle-mounted platform could interfere with the safe swinging of a load by the crane.
4. Power lines and surrounding site work do not allow for the safe use of a vehicle-mounted platform.

Crane Suspended Personnel Platforms

Crane suspended personnel platforms were not used on this project for the following reasons:

1. A second crane close enough to suspend any employee in the working area could interfere with the safe swinging of a load by the crane.
2. Power lines and surrounding site work do not allow for the safe use of a second crane on the job.

Enforcement

Constant awareness of and respect for fall hazards, and compliance with all safety rules, are considered conditions of employment. The job site superintendent reserves the right to issue disciplinary warnings to employees, up to and including termination, for failure to follow the guidelines of this plan.

Accident Investigations

All accidents that result in injury to workers, regardless of their nature, will be investigated and reported. It is an integral part of any safety plan that documentation takes place as soon as possible so that a reoccurrence can be prevented.

In the event that an employee falls or there is some other related, serious incident occurring, this plan will be reviewed to determine if additional practices, procedures, or training need to be implemented to prevent similar types of falls or incidents from occurring.

Changes to Plan

Any changes to plan will be approved by Bobby Hooks. This plan will be reviewed by a qualified person as the job progresses to determine if additional practices, procedures, or training needs to be implemented to improve or provide additional fall protection. Workers will be notified and trained in the new procedures. A copy of this plan and all approved changes will be maintained at the jobsite.

Lookout/Tagout Procedures

GRAHAM ROOFING LOCKOUT/TAGOUT PROCEDURES

Serious injuries and deaths occur every year when workers are repairing or servicing machines, which are accidentally activated. Timers, automatic controls, malfunctioning controls or other services, can activate these machines. The lockout/tagout regulation addresses this safety hazard, which has caused thousands of injuries and approximately 120 deaths per year. This company is not exempt from this Occupational Safety and Health Administration (OSHA) regulation. All personnel will comply with these lockout/tagout procedures, which control hazardous energy. The preferred method of isolating equipment from energy or power sources is to physically lock the controls in the "off" position. In some cases, this locking procedure is not possible; therefore warning tags must be placed on the controls while the machine is being serviced.

PURPOSE

To establish at least the minimum requirements for the lockout or tagout of energy isolating devices. It shall be used to insure that the machine or equipment is isolated from all potentially hazardous energy, and is locked out or tagged out before employees perform any servicing or maintenance activities where the inadvertent activation of the machine or its components could cause injury. Inadvertent activation includes unexpected energization, start-up or release of stored energy from springs, compressed gases, pressurized fluids or elevated parts.

RESPONSIBILITY

Employees responsible for servicing and/or maintaining equipment shall be instructed in the safety significance of the lockout/tagout procedure. Each new employee, transferred employee, or other employee whose work operations are or may be in the area, shall be instructed in the purpose and use of the lockout/tagout procedure. New or transferred employees must receive training on the lockout/tagout procedures prior to assignment.

1. Lockout/tagout devices will be provided when needed by the job site supervisor.
2. Lockout / tagout devices must be standardized as to color, size and shape.
3. Each authorized person must be individually keyed.

It shall be the responsibility of the employees performing the maintenance or repair to implement the lockout/tagout procedure before work begins.

DISCIPLINARY ACTION REQUIRED FOR BY-PASSING LOCKOUT OR TAGOUT DEVICES

The only person(s) authorized to remove lockout/tagout devices is the person(s) who installed the devices. The purpose of the lockout/tagout procedure is to prevent injuries caused by a machine being activated while someone is servicing or repairing it. Therefore, unauthorized removal or bypassing the lockout/tagout device compromises the worker's safety.

1. Any person who bypasses a lockout/tagout device and energizes starts or otherwise activates a machine or who removes a lockout/tagout device without authorization shall be disciplined according to our policies and procedures.
2. Disciplinary action shall be taken whether or not injury or damage occurs.

PREPARATION FOR LOCKOUT/TAGOUT

1. Make a survey to locate and identify all isolating devices to be certain which switches, valves or other energy isolating devices apply to the equipment to be locked out or tagged out.
2. More than one energy source (electrical, mechanical or others) may be involved.

SEQUENCE OF LOCKOUT OR TAGOUT SYSTEM PROCEDURES

1. Notify all affected employees that a lockout or tagout system is going to be utilized and the reason for utilizing the lockout/tagout system.
2. The authorized employee to use the lockout/tagout system shall know the type and magnitude of energy that the machine or equipment utilizes and the hazards that exist with the energy source.
3. If the machine or equipment is in operation, shut it down by the normal stopping procedure (depress stop button, open toggle switch, etc.).
4. Operate the switch, valve, or other energy isolating device(s) so that the equipment is isolated from its energy source(s). Stored energy such as that in springs, elevated machine parts, hydraulic pressure, rotating flywheels and other types must be dissipated or restrained by methods such as repositioning, blocking, bleeding down or other appropriate methods.
5. Lockout and/or tagout the energy isolating devices with assigned individual locks or tags.
6. After ensuring that no personnel are exposed, and as a check on having disconnected the energy sources, operate the machine's normal operating controls to make certain the equipment will not operate.
7. **Caution: Return operating controls to "neutral" or to "off" position after the test.**
8. The equipment is now locked out or tagged out.

RESTORING MACHINES TO NORMAL PRODUCTION OPERATIONS

1. Remove all tools, loose parts, etc., from the machine.
2. Replace all guards or shields
3. Check the area around the machine or equipment to ensure that no one is exposed to danger after service or repair is complete and the equipment is ready for normal operations.
4. Remove all lockout/tagout devices.
5. Operate the energy isolating devices to restore energy to the machine or equipment

PROCEDURE INVOLVING MORE THAN ONE PERSON

If more than one person is involved in the service or repair of a machine, each individual will place his/her personal lockout or tagout device on all energy isolating devices. When an energy isolating device cannot accept multiple locks or tags, a multiple lockout device (a hasp) may be used. If lockout is used, a single lock may be used to lockout the machine or equipment, but the key to that lock must be placed in a lockout box or cabinet, which allows the use of his/her own lock to secure the box or cabinet. As each person no longer needs to maintain his/her lockout protection, that person will remove his/her own lock from the lockout device or from the lockout box.

PROCEDURE INVOLVING MORE THAN ONE SHIFT OR GROUP OF WORKERS

There may be occasions when a lockout or tagout device must remain in place for more than one work shift or after other personnel changes. The procedure depends on whether or not employees on the incoming shift will be working on the locked out/tagged out equipment.

1. If service or repair work will be continued by the new shift:
 - a. Employees leaving the workplace will remove their locks.
 - b. Incoming employees will connect their locks under the direct observation of their supervisors.
 - c. The supervisors for both shifts will be present for the transfer of the lockout/tagout.
2. If employees on other shifts will not be working on the machines:
 - a. The lockout and tagout devices will remain in place.
 - b. The incoming personnel will be notified that a lockout/tagout is in effect.
 - c. The supervisors of both shifts will be responsible for ensuring that the information is made available to the incoming personnel.

UPGRADE OF ENERGY ISOLATING DEVICES REQUIRED

1. Energy isolating devices designed to accept lockout devices must be installed when:
 - a. Any major replacement, repair, renovation, or modification of machines or equipment is performed.
 - b. New machine or equipment is installed.

CORD AND PLUG CONNECTED ELECTRIC EQUIPMENT

Electric equipment connected by a cord and plug is not covered by the lockout/tagout rules when the cord is under the exclusive control of the person performing the repair or maintenance and is unplugged during servicing.

HOT TAP OPERATIONS

Work involving transmission and distribution systems for substances such as gas, steam, water or petroleum can be performed on a pressurized pipeline system if:

- a. The employer can demonstrate that the continuity of service is essential.
- b. Shutdown of the system is impractical and documented procedures are followed.
- c. Special equipment is used that will provide effective protection for employees.

AUDIT INSPECTION OF THE LOCKOUT/TAGOUT PROCEDURE

The lockout/tagout procedure will be audited or inspected on an annual basis to ensure that the procedure and requirements of the OSHA standard are being followed. Included in the audit will be documentation of review training for employees. Any deviations in procedures will be corrected.

QUICK CHECKLIST FOR LOCKOUT / TAGOUT

1. Steps for shutdown
 - a. Prepare – Before you begin, be sure you know:
 - i. All the types of energy involved
 - ii. Hazards presented by energy
 - iii. How to control the energy
 - b. Shutdown- Turn off machine or equipment.
 - c. Isolate- Isolate machine or equipment from its energy source(s). (For example turn off main circuit breaker.)
 - d. Lockout- Apply your lock. Be sure that it holds the isolating device in the “off” or “safe” position.
 - e. Release- Release stored energy. Relieve, disconnect, restrain, block or otherwise ensure that all energy sources-electrical, mechanical, hydraulic, and compressed, etc., are de-energized.
 - f. Verify- Try the on-off switch or other controls to be sure the machine won't start. Return the switch to the “off” position.
 - g. Your lockout is complete.
2. Steps for Restart
 - a. Inspect- Inspect the equipment to be sure that:
 - i. All tools and other materials are removed
 - ii. The machine is fully reassembled
 - iii. Guards and other safety devices are reinstalled
 - b. Notified- Be sure that:
 - i. All employees are safely positioned
 - ii. All affected employees are notified of the restart
 - c. Remove- Remove lockout devices. Remember that only the person who put the lock on may remove it.

Respiratory Protection Program

GRAHAM ROOFING RESPIRATORY PROTECTION PROGRAM

PURPOSE: To set forth information for employees that may be exposed to a work place that contains a hazardous situation. It is important to remember that every situation is different when dealing with respiratory protection due to the changing elements and factors; therefore this program is for information only and each situation shall have a site specific plan written when the need for respirator use is present, with the exception of a dust mask used voluntarily.

BREATHING AIR COMPRESSORS:

Breathing air compressors, which provide supplied air to a full-face piece air-purifying respirator or a loose-fitting hood or helmet face piece, should be evaluated to comply with the new Respiratory Protection Standard 29 CFR 1910.134.

If the employer compresses air for breathing, the purity must be of high quality and match the 1989 recommendations of the Compressed Gas Association for Grade D breathing air. This should be verified with the manufacturer of the compressor. The air inlet must be located away from sources of contaminations such as exhaust gases from nearby vehicles or from the motor that powers the compressor itself. Also, moisture & temperature could result in valves freezing in cold environments, which could block airlines, fittings and pressure regulators.

Breathing air compressors are required to have suitable in-line, air-purifying sorbent beds and filters with documentation of their change dates. Periodic inspection is critical to compressor performance. The employer must determine the change-out schedule and it is strongly recommended that this be documented. The employer must limit carbon monoxide levels by either using non-oil lubricated compressors or if using oil lubricated compressors using an alarm to warn of high temperature and/or high carbon monoxide levels. Carbon monoxide levels must be measured, if oil lubricating compressors lack a carbon monoxide alarm, at sufficient frequent levels to prevent carbon monoxide levels in the breathing air from exceeding 10 parts per million (ppm). Continuous carbon monoxide monitoring is recommended whenever the purity of the inlet air is not optimal or if the compressor has a history of malfunction.

The standard requires that breathing air couplings must not be compatible with couplings for non-respirable air, such as plant worksite air nitrogen systems. By requiring incompatibility couplings with other gas or air systems, OSHA intends to prevent inadvertent cross-connections that could result in adverse health effects or even coma and death by respirator users who rely on supplied air in their respirators.

MEDICAL QUESTIONNAIRE/EVALUATION:

The employee must complete medical questionnaire with assistance from a licensed health care professional to determine if there are limitations on the type of respirator to be worn by the employee. This includes the supplied air full-face piece and the supplied air loose-fitting hood or helmet. It must be administered for all voluntary use except the nuisance dust masks.

Best results are to provide the questionnaire for the employee to complete on company time as best they can and refer them on to the licensed health care professional of your choice. Also, provide a blank copy of the medical questionnaire, copy of the written respiratory program and information on respirators to be used to the licensed health care professional in advance of the visit by the employee. The medical questionnaire is considered a part of the medical record and strict confidentiality must be insured. The licensed health care professional can provide written documentation back to the employer on the status of the employee wearing a respirator and the type of respirator to be worn. These records should be maintained up to 30 years after employment of the employee required to wear respiratory protection.

WRITTEN PROGRAM:

- Respirator selection (NIOSH certified)
- Medical evaluations (required for all respirators excepts dust masks)
- Fit testing (every respirator annually except loose fitting hood or dusk mask)
- Respirator use
- Respirator maintenance
- Air supply
- Hazards training
- Respirator training (annually)
- Program evaluations
- Program administrator (PA) appointed (must be a trained employee)

A written program is not required for voluntary use of dust mask respirators.

FIT TESTING:

Fit testing is required prior to use on any negative or positive pressure type/fitting face piece. This does not include face pieces "nuisance dust masks". Nor does it include loose fitting hoods with supplied air. Fit testing can be qualitative or quantitative. It is required prior to initial use, whenever a different respirator face piece is used and annually thereafter. Additionally, fit testing is required when changes in weight occur. Fit testing must be completed in the negative pressure mode even on positive pressure respiratory protection equipment.

TRAINING:

The employer must ensure annually that the employee can demonstrate knowledge of proper fit, usage and maintenance of equipment. The employee must understand the limitations and capabilities of the respiratory protection provided and proper maintenance and storage.

VOLUNTARY USE OF RESPIRATORS:

Where the workplace atmosphere is within the OSHA air contaminate limits, but the employee chooses to wear a respirator for additional protection or comfort; this is considered voluntary of non-required use of respirators. There is no need of a written program with dust mask use only. However, the same determination on the fitness of an employee to wear a respirator must be evaluated with a medical evaluation of fitness to wear a respirator except for the nuisance dust mask.

If the only respirators that are voluntarily worn are negative pressure filtering face pieces (dust masks), the only required step is the training provision of Appendix D of the standard. This document is available. It should be noted that there is a signature line with date which should be signed by the employee after review with a copy provided to the employee and one placed on file with the respiratory protection training/documentation of the employer.

Should you have a need for respiratory protection contact the Graham Roofing office before proceeding with your task. The following form shall be used to compile information for the site-specific plan.

GRAHAM ROOFING RESPIRATOR PROTECTION PROGRAM

Respirator use will be required in certain areas for protection against particulates, dusts, vapors, gases or other physical or biological atmospheres that can cause acute or chronic health problems (either one or more depending on exposure).

- Respirator use will be required in the _____
(Specific area)
- Respirator use will be required at all times in the _____
(Specific area)
- Respirator use will be required in _____
(Specific area)

All employees that are required to use respirators must be certified to use respirators through Fortier Loss Control Consultants or other approved means.

Certification Includes:

1. Training on proper maintenance, safety, fitting and use of a respirator.
2. Job-specific training on when and where respirators should be worn
3. Fit testing of respirators.
4. Completion of Respirator Medical Questionnaire.
5. Taking Respirator Medical Questionnaire to licensed health care practitioner to determine the need for a pulmonary fitness examination.

Material safety data sheets are available on all chemicals used in the work area from your supervisor.

Motor Vehicle Fleet Policy

GRAHAM ROOFING FLEET SAFETY PROGRAM

Vehicle operations represent a tremendous potential for accidents and serious financial loss. The U. S. Department of Transportation regulates the operation of Commercial Motor Vehicles and violation of their regulations can result in large fines. The following policies are designed to minimize these exposures and encourage safe operation of all our vehicles.

A. RULES AND PROCEDURES

1. Know local traffic regulations.
2. Plan routes to minimize exposure. Consider volume of traffic, school crossings, major thoroughfares, congested shopping areas, etc.
3. Operators of trucks and large equipment should inspect their vehicles prior to every trip. Commercial Motor Vehicles must have a documented pre-trip inspection.
4. Provide for safety devices (air pressure indicator, rear view mirrors, wheel chocks, safety struts, back-up alarms, etc.)
5. Follow established safe speed limits.
6. Drivers must receive annual training and ongoing training as required.
7. Only authorized passengers are allowed in the vehicle.
8. All occupants of the vehicle are required to wear seatbelts.
9. The use, possession or being under the influence of any illegal substance or legal substance that may impair the driver's ability to operate a vehicle is unauthorized.
10. Personal use of company vehicles is restricted to direct travel to and from work.
11. Any citation received or restriction of licenses must be reported to the company office immediately.

B. QUALIFICATIONS

1. Anyone who will be allowed to drive a Company vehicle must have a valid driver's license. A copy of the license must be made and kept on file.
2. Graham Roofing submits a list of all employees with valid drivers' license to our insurance company on an annual basis and on all new hires.
3. If the insurance company returns your name with deficiencies on your driving record, Graham Roofing may check your MVR. You will need to sign a MVR consent at that time. **NOTE: All new hires with current, valid drivers' license will need to sign a MVR and have it run by our insurance company.**
4. If the MVR is run and you have 2 or more B violations (see attached), Graham Roofing's insurance could exclude you from the insurance policy. If this occurs, your employment and/or pay could be in jeopardy.
5. If you have an A violation (see attached), Graham Roofing's insurance will exclude you from our insurance policy. If this occurs, your employment and/or pay at Graham Roofing could be in jeopardy.

6. If you are excluded from our insurance policy, you will be required to sign a Drivers' Exclusion form.
7. Employees driving commercial motor vehicles must have the appropriate license, current physical/medical card, annual MVR check and be included in our D.O.T. drug-testing program.

**GRAHAM ROOFING
DRIVER ORIENTATION**

- A. Obtain a copy of driver's license and ensure that it is valid.
- B. Must be at least 21 years old to drive a company vehicle and/or 25 years old to drive a commercial vehicle.
- C. Request a Motor Vehicle Report (MVR) from the state department of safety. Drivers with more than one minor infraction in the last three years may not be allowed to drive company vehicles
- D. Contact previous employers in order to ascertain previous work history and verify application.
- E. If the driver will be operating a Commercial Motor Vehicle ensure that they have the proper class license. Refer to the "5 to Drive" packet.
- F. Assign the new driver to an experienced driver for an evaluation period to be determined by management.
- G. Effective May 1, 2011, only Graham Roofing employees are allowed to be passengers in Graham Roofing vehicles that require an operator with a commercial drivers' license (CDL class A or B).

GRAHAM ROOFING ACCIDENT REPORTING AND INVESTIGATION

A. ACCIDENT REPORTING

If an accident does occur, it is important that it be reported promptly. Use the reporting procedures in the safety manual to communicate any accidents. Complete the accident report (attached) form with as many details as possible. Information recorded immediately at the scene of the accident will be valuable in the investigation and determination of the cause and will facilitate the necessary corrective measures.

B. ACCIDENT INVESTIGATION

- Report all accidents to the home office immediately.
- An employee driving a Graham Roofing vehicle that is involved in an accident will be required to take a drug and alcohol test immediately.
- Investigate all accidents as soon as they happen and while the facts are still fresh in your driver's mind. A minor accident may have serious consequences at a later date.
- Avoid jumping to conclusions or placing blame on your driver. Get to the real cause and determine if the accident could have been prevented.
- Take corrective action to prevent recurrence.
- Follow up later to see if the corrective action brought satisfactory results.

GRAHAM ROOFING FLEET MAINTENANCE AND INSPECTION

1. VEHICLE MAINTENANCE

We believe our fleet will function properly and more efficiently if a regular maintenance program is observed. It is the simplest and most economical means of protecting our original investment. An effective preventative maintenance program consists of daily checks by drivers and inspections/service by mechanics on a regular basis. It is the driver's responsibility to ensure the tracking of these miles. It should serve to prevent accidents caused by mechanical defects and to reduce overall maintenance costs. Drivers should report any defects on a daily basis so repairs can be made as soon as possible. A truck inspection report will be turned in weekly to Christee on all non-DOT vehicles by the designated person and daily on all commercial motor vehicles requiring a CDL.

A good preventative maintenance program can result in:

- Reduced number of accidents caused by mechanical failures
- Reduced maintenance costs by making minor repairs rather than major ones
- Less time lost to vehicles out of service
- Better driver morale from operating vehicles which are always in good condition
- Improved public relations because of a clean, well-kept fleet, which reflects a positive image for our business

A record shall be kept of preventative maintenance and repairs made to all vehicles. The records shall include the nature of the repair, the person who performs the maintenance and the final cost.

1. Regular preventative maintenance shall be performed every 3,000-5,000 miles.
2. Supervisory personnel shall do a periodic inspection of vehicle.
3. Maintenance and repairs-All repairs must be approved by management.
4. The following inspections must be done by all drivers of company vehicles:

1. Pre trip
2. Post trip
3. Weekly

5. The following items shall be inspected on a Pre Trip and Post Trip inspection:

1. headlights
2. tail lights
3. directional signals
4. windshield wipers
5. horn
6. brakes
7. vehicle emergency lights
8. emergency brake
9. tires

10. windshield condition
11. vehicle body condition
12. seat belts
13. heater/defroster/air conditioner
14. accident report kit
15. fire extinguisher
16. emergency warning equipment (flares, flags, reflector)

6. The following items shall be checked on weekly inspections or as need arises:

1. The items listed above
2. Engine oil
3. Transmission fluid level
4. Engine coolant level
5. Tire pressure and wear
6. Windshield washer fluid level

WEEKLY VEHICLE INSPECTION

Truck #: _____

Inspected by: _____

Date Inspected: _____

Item	Satisfactory	Unsatisfactory	Not Applicable	Comments
Headlights				
Tail Lights				
Directional Signals				
Windshield Wipers				
Windshield Condition				
Horn				
Brakes				
Emergency Lights				
Emergency Brake				
Seat Belts				
Heat/Defroster/Air Conditioner				
Engine Oil				
Transmission Fluid Level				
Engine Coolant Level				
Windshield Washer Fluid				
Tires, Condition				
Tire Pressure & Wear				
Vehicle Body Condition				
Fire Extinguisher				
Accident Report Kit				
Emergency Warning Equipment				
Other Items (List Below);				

Other Comments: _____

Complete on each vehicle every week and turn in to Christee

Hazardous Communications/MSDS

LETTER TO EMPLOYEES

TO: ALL EMPLOYEES

FROM: GRAHAM ROOFING

SUBJECT: HAZARD COMMUNICATION STANDARD (HCS)

It is the intent of this company to comply with the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (HCS). The purpose of this standard is to ensure that all company employees are fully informed about the chemical hazards encountered at the work place. As your employer, we have certain obligations under the law and we will need your help and cooperation in fulfilling these obligations.

Bobby Hooks is responsible for coordinating training to ensure that our company and our employees are in compliance with the standard and other regulations effecting your health and well being.

In signing my name below, I verify that I did receive training on the company Hazard Communication Program and understand and agree to abide by its contents.

DATE

EMPLOYEE SIGNATURE

SECTION 1

INTRODUCTION

This introduction is designed to meet the requirements of the "Federal Hazard Communication" Standard. Outlined in the program are the steps that this company will follow in meeting the training and informational requirements of the law. The management of this company hopes this program will provide their employees with all the information they need to safely perform their jobs. If additional information is needed, employees are encouraged to request the information through their supervisors.

Bobby Hooks has been assigned the responsibility of insuring that the provisions of the Hazardous Chemical Law have been complied with, and any questions concerning this program should be directed to him at 662-492-9555.

Bobby Hooks, President

Graham Roofing

SECTION II

TRAINING PROGRAM

- **Administrator and Designated Trainers**

The administrator of this program will be Bobby Hooks. He will oversee both the initial training and our ongoing training program. A roster of the employees trained under this program will be kept in our corporate office. Their supervisor will conduct training of new employees.

- **Annual Refresher Training**

Our company will annually dedicate a safety meeting to the subject of hazardous materials. During this meeting, the MSDS on all hazardous materials regularly used by our employees will be discussed. In addition, proper handling procedures, container labeling, and first aid procedures will be reviewed. Prior to this meeting, the Hazardous Chemical List will be reviewed and updated as needed.

- **Hazard Determination Program**

Chemicals used by this company shall be evaluated by the following to determine if they are hazardous or not:

Person responsible for program: Bobby Hooks

Person assigned to hazardous chemical evaluation: Bobby Hooks

1. For Chemicals Used:

Material Safety Data Sheets (MSDS) are used to evaluate whether or not supplied chemicals are hazardous. Chemicals, which are health hazards, will be designated as such by having ingredients that are listed in the hazardous ingredients section.

2. For Chemicals Produced: (Such as intermediate products, welding fumes, carbon monoxide and wood dust)

MSDS's or equivalents are produced internally or obtained from the state Department of Labor. Chemicals for which there is scientifically valid evidence that it is combustible liquid, a compressed gas, explosive, flammable, organic peroxide, an oxidizer, pyrophoric, unstable (reactive) or water reactive are considered hazardous, and defined as physical hazards.

*Additional Information:

Chemicals found in the following publications will automatically be considered as health hazards:

1. 29 CFR 1910, Subpart Z, "Toxic and Hazardous Substances", (OSHA);
2. "Threshold Limit Values and Biological Exposure Indices", latest edition, American Conference of Governmental Industrial Hygienists (ACGIH), and for chemicals that are carcinogens or potential carcinogens;
3. National toxicology program (NTP), "Annual Report on Carcinogens", (latest edition);
4. International Agency for Research on Cancer (IARC), "monographs", (latest edition);

Location of Material Safety Data Sheets

MSDS's will be kept in an open file located in the main office and/or jobsite trailer. Supervisors will also carry a copy of the MSDS's in their truck.

Employees are encouraged to review these sheets as often as they feel necessary. Anyone wishing to copy a MSDS for his or her own use is encouraged to do so, but the original must not be removed from the file.

5. Location of Employee Rights Poster-a poster that outlines employee rights under this law will be posted on the employee bulletin board. Employees who have any questions that cannot be answered by the supervisor will be directed to our office.
6. Training of New Employees-Any new employee will be thoroughly trained in the elements of the program prior to entering a workplace where he may be exposed to hazardous materials. This training will be done by their supervisor and consist of reviewing the elements of the law and pertinent parts of the Material Safety Data Sheets in the file. Particular emphasis will be placed on employee recall. The training outline contained in Section III will be used as a guide to insure the quality of this training. Workers will fill out the Hazard Communication worksheet as they undergo training.
7. Methods used to inform employees of the hazards of non-routine tasks – employees involved non-routine tasks (such as tank cleaning and maintenance) will be informed of the hazards involved, and trained at specific training sessions so as to insure awareness of required information.
8. Methods Used to Inform Contractor Employers-Subcontractors who may be exposed to hazardous chemicals will be informed both verbally and by means of an information sheet, as to hazards involved at a meeting before any work is accomplished.
9. Hazards of Unlabeled Piping-if work must be done on unlabeled piping the contents of that piping must be identified and communicated to the workers that will be performing the work. Under no circumstances will non-qualified or non-trained workers open unlabeled piping.
10. Labeling – Graham Roofing will not remove the labels from containers in which materials arrive. Should the label become defaced or illegible, it will be replaced with a label that contains the product identity, the health and physical hazards and the manufacturer's name and phone number for emergency use. Portable containers will be labeled with a labeling system that includes the name of the material, the health and physical hazards, and the personal protective equipment to be used or any special precautions. Labels shall be legible, in English. However, for non-English speaking employees, information may be presented in their language as well.
11. HMIS provides employees the tools to understand and handle chemicals exhibiting a variety of physical hazards with a far greater degree of precision. The HMIS labeling system not only specifically incorporates each hazard, with specific criteria to evaluate the degree of hazard, but permits employers to identify the hazard present with an icon or symbol. Under the HMIS a worker can know immediately, for example, that a material he is handling is rated as an explosive, and that it is rated as a "3", giving him or her much more precise and useful information about the safe handling of that material.
12. Color codes are as follows:
 - Blue=hazards as they relate to health issues
 - Red=flammability or combustibility
 - Yellow=Reactivity of stability
 - White=Special instruction or protection
13. The numbers placed in the color coded section represent the severity of the substance as it relates to the category. The numbers and symbols are coded as follows:

HAZARDOUS MATERIALS IDENTIFICATION SYSTEM

HMS

HAZARD INDEX

- 4 = SEVERE HAZARD
- 3 = SERIOUS HAZARD
- 2 = MODERATE HAZARD
- 1 = SLIGHT HAZARD
- 0 = MINIMAL HAZARD

An asterisk(*) or other designation corresponds to additional information on a data sheet or separate chronic effects notification

Additional information

PERSONAL PROTECTION EQUIPMENT

A Safety Glasses	n Respirator	o Face Shield	p Gloves
q Boots	r Synthetic Apron	s Eye Wash	t Head Protection
u Wear Label	w Use A Vapor Canister	y Full Face Respirator	z Airline Hose or Umb

PERSONAL PROTECTION INDEX

A	
B	
C	
D	
E	
F	
G	
H	
I	
J	
K	
X	Consult your supervisor or S.O.P. for "SPECIAL" handling directions

SECTION III TRAINING OUTLINE Hazcom Program

Introduction

The concept of the Hazard Communication Program was born in 1974 when the Standards Advisory Committee was formed to develop guidelines to implement Section 6 (B) 7 of the Occupational Safety and Health Act. This rule became law in 1984 and became known as 29CFR Section 1910.1200. This law was designed to provide employees with the training necessary to safely deal with hazardous chemicals in the workplace. Its original intent was to provide information to employees in SIC Codes 20-39, which are manufacturing industries, which use large quantities of hazardous materials. The scope has since been expanded to include all companies.

- Basic elements of the Hazcom Program
 - A. The program is directed at two general groups: chemical manufacturers and chemical users.
 - B. There are five basic categories of the federal law:
 1. Evaluate chemical hazards.
 2. Affix warning labels.
 3. Provide Material Safety Data Sheets.
 4. Conduct chemical handling training.
 5. Develop a written program.
 - C. A detailed explanation of each of these requirements is as follows:
 1. Evaluate chemical hazards. Each employer is required to inventory all of the materials used by his employees and determine if they are hazardous materials and should fall under this program. Any chemicals listed by the following sources are directly applicable to the hazard communication standard:
 - a. Occupational Safety and Health Administration
 - b. American Conference of Governmental Industrial Hygienists (ACGIH)
 - c. National Toxicology Program
 - d. International Agency for Research on Cancer.The materials covered by this program are any materials that constitute physical, toxicological or carcinogenic hazard to the worker.
 2. Affixed warning labels. Manufacturers of hazardous materials are required to label all shipping containers holding their products. These labels must be on the box holding individual containers and on the individual containers. The labels may show the chemical name or its common name designation, and the label must contain a warning describing the primary health and physical hazards of the chemical. As an end user who does not manufacture or re-package hazardous chemicals, our responsibilities are limited to insuring that proper warning labels are on all hazardous chemical containers when they arrive at our office. Shipments of hazardous chemicals that arrive without proper warning labels will not be accepted.

3. Provide Material Safety Data Sheets (MSDS). MSDS's must be obtained on all hazardous materials falling under the program. These sheets must be kept in a file that is accessible by all employees. These sheets contain the information that is necessary to determine the hazards involved with working with these chemicals. In addition, these sheets outline the protective measures that must be taken to prevent exposure to the chemicals and first aid procedures that should be implemented if an employee becomes exposed. The location of these sheets will be outlined in the written program. Manufacturers of these materials are required to provide the consumer with Material Safety Data Sheets. If these sheets are not provided with the first shipment, they can be requested from the manufacturer.
4. Conduct chemical handling training. Employee training sessions must highlight the following five areas:
 - a. Review the purpose of the Hazard Communication Standard.
 - b. Describe the Material Safety Data Sheet's use and cataloging system.
 - c. Review the hazards of the chemicals used by employees.
 - d. Describe the safety measures for controlling the hazard
 - e. Summarize the particular hazardous materials used by the employer.

Training is required for all employees who are exposed to hazardous chemicals in the workplace. The Hazcom Law is a performance-oriented standard, meaning that the effectiveness of the program will be evaluated by how well the employees have been informed about the hazardous work environment.

- Review of hazardous materials

The Material Safety Data Sheets of all the hazardous materials used in this company will be reviewed one by one with the important points being explained to the employees. The most important points on the MSDS are the following items:

1. The nature of the hazard that the chemical presents, i.e. flammable, carcinogenic, reactive, etc
2. Method of entry into the body, i.e. inhalation, absorption, or ingestion.
3. Protective measures needed to prevent overexposure.
4. First aid to be implemented if overexposure occurs.

GRAHAM ROOFING
Training Outline for Right-to-Know/Hazcom Law

HAZARDOUS CHEMICAL

Any chemical, which poses a threat to your body.

COMPLIANCE

Any company which uses hazardous chemicals must comply with the Right-to-Know Law.

FIVE CATEGORIES OF HAZCOM LAW

1. Hazard evaluation
2. Written program
3. Labels and warning signs
4. Collect Material Safety Data Sheets
5. Conduct employee training

TYPES OF HAZARDS

1. Physical hazard: flammable, combustible, explosive (occurs outside the body)
2. Health hazard: skin irritation, carcinogens, toxic (occurs inside the body)

TYPES OF HEALTH HAZARDS

1. Acute: immediate reaction
2. Chronic: may take years to show symptoms

METHODS OF ENTRY TO THE BODY OF TOXIC CHEMICALS

1. Inhalation: breathing in vapors or fumes
2. Absorption: getting material on skin or in eyes
3. Ingestion: eating or drinking the material

MATERIAL SAFETY DATA SHEETS

A Material Safety Data Sheet (MSDS) is printed material concerning the hazards of a product.

MSDS's for all hazardous chemicals used on the job must be reviewed.

MSDS's must be kept on the jobsite.

FIRST AID

Inhalation exposure: fresh air

Absorption: fresh water

Ingestion: Notify emergency medical and reference the MSDS for instruction

**GRAHAM ROOFING
RIGHT-TO-KNOW/HAZCOM
WORKSHEET**

NAME _____
DATE _____

1. What companies are required to comply with the Right-to-Know Law?

2. What is a hazardous chemical?

3. What is a Material Safety Data Sheet and where are they kept?

4. What are three ways a chemical can enter your body?

5. What is the most common first aid for overexposure to hazardous chemicals?

6. What hazardous chemicals are you exposed to and how can you determine overexposure?

For Chemical Inventory List See Company
HazCom manual

Anyone wishing to review an MSDS sheet has the right to do so and shall be given a copy upon request.

An MSDS sheet shall be maintained on all hazardous chemicals used; a copy of each shall be placed in the MSDS book that is kept in the supervisor's company vehicle and safety trailers.

If any question should arise about the use of a hazardous chemical stop and ask your supervisor or call the main office.

Substance Abuse Policy

GRAHAM ROOFING SUBSTANCE ABUSE PREVENTION AND DETECTION PROGRAM

Graham Roofing, Incorporated is adopting this substance abuse prevention and detection policy for its employees. This is to notify all Graham Roofing employees, applicants, employees of other companies, suppliers and visitors that the use, abuse, presence in the body or reporting to work under the influence, bringing onto company property, unlawful manufacture, distribution, dispensation, possession, transfer, storage, concealment, transportation, promotion or sale of the following illegal and unauthorized drugs, controlled substances, alcoholic beverages, weapons, stolen-property or drug-related paraphernalia by employees and others is strictly prohibited from all the above-mentioned company premises, or while on company business and/or during regular work hours. This policy is intended:

1. To deter and detect illegal and unauthorized workplace substance abuse;
2. To assist employees in obtaining confidential counseling and/or rehabilitation assistance;
3. To assist in maintaining a safe working environment;
4. To protect the property of the Company;
5. To minimize absenteeism, tardiness, improve productivity and to ensure quality workmanship;
6. To protect the reputation of the company and employees within the community, industry at large and among our customers and to assure that the company abides by governmental regulations, laws and/or ordinances when appropriate.

This policy prohibits all use of controlled substances by Graham Roofing employees as set forth in this policy. Graham Roofing employees are also prohibited from possessing alcohol while on duty or on the premises as defined herein and from using alcohol for a period beginning four hours before going on duty and ending when they go off duty. To further this policy, Graham Roofing will conduct drug and alcohol testing. Those who test positive in violation of this policy are subject to termination.

This written policy will outline in detail the policy Graham Roofing is adopting. All affected employees and prospective employees must carefully review this policy and sign an agreement to be bound by its terms as a condition of employment. If you have any questions about this policy or how it will affect you, contact Bobby Hooks or your supervisor.

For the purpose of this policy, the term "company premises" as used herein includes all Graham Roofing affiliates and subsidiaries (herein known as the Company) property, offices, facilities, land, buildings, structures, fixtures, installations, automobiles, trucks and all other vehicles and equipment, whether owned, leased or used. Company premises as defined herein also includes all customer/client properties, areas under the Company's control, or any other work locations or mode of transportation to and from those locations during working time and while in the course and scope of company employment, pay status of on company business during regular work hours.

This policy/program will apply to all regular full-time, part-time, probationary, or contract employees and to employment applicants of the Company. This policy also applies to all company contractors, subcontractors, suppliers, and vendors. Compliance with this policy will be required by the Company as a condition of employment for qualified applicants or continued employment for employees.

The Company will not offer or provide either employment or continued employment to individuals whose conduct is prohibited by this policy.

PROHIBITED SUBSTANCES (including the presence of any confirmed detectable amount in the employee/person while working regardless of when or where the substance entered their system.)

1. Illegal drugs such as, but not limited to, marijuana (pot, dope, hash or hashish), cocaine (coke, rock, crack or base), LSD (acid), PCP (angel dust, crystal) MDMA (ecstasy), heroin (smack, black stuff, black tar), opium, morphine, and any other illegal or unlawfully obtained drugs.
2. Designer and synthetic drugs such as, but not limited to, ice/ice cube, crank, china white, synthetic heroin, MDMA, Adam, Eve, Love Drug and any other drugs that are made in clandestine laboratories where the chemists alter the molecular structure of both legal and illegal drugs to create a drug that is not explicitly banned by federal law.
3. Unauthorized or prohibited drugs such as, but not limited to, nonprescription inhalants, stimulants and amphetamines (methamphetamine, crystal methamphetamine, speed, uppers crank, ice, UPS, butyl nitrate, push, locker room, look-alikes, act-alikes) or any other tablets, capsules and powders containing controlled over-the-counter ingredients whose physical appearance mimics various prescription drug products which contain popular substances of abuse and are regulated under the provisions of the Controlled Substances Act of 1970. The term "unauthorized" includes prescribed drugs not legally obtained and prescribed drugs not being used for prescribed purposes as well as any abnormal or dangerous substances which may affect an employee's/person's mood, responses, motor functions or alter or affect an employee's/person's mood, responses, motor functions or alter or affect a person's perception, performance, judgment, reactions or senses while working.
4. Unauthorized alcoholic or intoxicating beverages such as, but not limited to, beer, wine, or liquor. The use or possession of alcohol or intoxicating beverages during regular work hours is prohibited. Because alcohol is a legal substance, the rules define specific prohibited alcohol related conduct. Performance of safety sensitive functions is prohibited:
 - a. while having an alcohol concentration of 0.02% or greater (as indicated by an alcohol urine or breath test)
 - b. within four hours after consuming alcohol.

In addition, refusing to submit to an alcohol test and using alcohol within eight hours after an accident or until tested is prohibited.

Any result less than 0.02% alcohol concentration is considered a "negative" test. If the alcohol concentration is 0.02% or greater, a second or confirmation test must be conducted. If using an EBT test, the test must be conducted using an EBT device that prints out the results, date and time, a sequential test number, and the name and serial number of the EBT device.

Employees who engage in prohibited alcohol conduct must be immediately removed from safety sensitive functions. Employees who have engaged in alcohol misuse cannot

return to safety sensitive duties until they have been evaluated by a substance abuse professional (SAP) and have complied with the treatment recommendations to assist them with an alcohol problem.

To further safeguard transportation safety, employees who have any alcohol concentration (defines as 0.02% or greater) in their breath or urine, when tested just before, during or just after performing such duties for 8 hours, cannot return to safety sensitive duties until another breath or urine test is administered, the employee must be removed for at least 8 hours.

5. Prescription and over the counter drugs (including legally obtained controlled substances.) Abuse of a prescribed controlled substance or use of a controlled drug not prescribed for the employee or applicant is prohibited. Employees and others covered by this policy may maintain on company premises prescription drugs and "over the counter" medications provided:
 - a. The prescription drugs are prescribed by an authorized medical practitioner for current use (within the past 12 months) of the person in possession and the medicine is in its original container and in the employee's or person's name. If the practitioner is authorizing the prescription for use for a period to exceed twelve (12) months, a letter from this practitioner is to be submitted to Graham Roofing.
 - b. Employees must not consume prescribed drugs more often than as prescribed by the employee's physician and they must not allow any other person to consume the prescribed drug.
 - c. The drugs, both prescription and over the counter, must be kept in the original container.
 - d. Any employee who has been informed that medication could cause adverse side effects while working or where medication indicates such warning, must inform their supervisor prior to using such substances on the job. The use of drugs/medicine prescribed by a licensed practitioner for the individual employee is permitted provided that it will not affect work performance. However, the company at all times reserves the right to have a licensed physician determine if use of a prescription drug or medication by an employee produces effects which may increase the risk of injury to the employee or others while working. If such a finding is made, the company may check with the employee's doctor (with permission) to see if other medications are available which would not affect the employee's ability to work safely. If appropriate substitute medicine is not available, the company may have to limit or suspend the work activity or the employee during the period that the physician advises that the employee's ability to perform his job safely may be adversely affected by the consumption of such medication.
6. Drug related paraphernalia. Drug related paraphernalia as used in this section of the policy is any unauthorized material or equipment or item used or designed for use in testing, packaging, storing, injecting, ingesting, inhaling or otherwise introducing into the human body a controlled dangerous substance.
7. Firearms, weapons, or explosive materials including but not limited to brass knuckles, illegal knives and other dangerous instruments. No personal firearms (loaded or unloaded) are allowed on company property except when

authorized for either security or law enforcement reasons.

8. Stolen property -Theft, conversion, misappropriation or unauthorized removal, possession or use of company property, including but not limited to, supplies, materials, facilities, tools, equipment, documents and proprietary information, or of any items or property of other employees or visitors is prohibited.

In order to accomplish the objectives of this policy, the Company reserves the right, at all times while entering, departing or on the premises, properties, and work areas described above or when circumstances warrant or when reasonable suspicion or cause exists to have properly authorized supervisors or search personnel conduct unannounced reasonable searches and inspections of company facilities, properties, as well as employees' and other persons' effects (such as, but not limited to, lockers, boxes, bags, parcels, lunchboxes, food/beverage containers, desks, tool boxes, clothing and vehicles) for the purpose of determining if such employees or other persons are in possession, use, transportation or concealment of any of the prohibited items and substances of this policy. Searches may be initiated without prior notice and conducted at times and locations as deemed appropriate by the Company. At no time will employees or others be touched nor will any clothing be removed during these searches and inspections.

The Company also reserves the right, in certain circumstances, to require qualified employees to submit to medical or physical examinations or tests at any time as a condition of employment or continued employment, including but not necessarily limited to urine drug and/or alcohol tests, breathalyzer, or other medical examinations to determine the use of any illegal or unauthorized drugs or substances prohibited in this policy or to prove the employee's satisfactory fitness for duty. These announced or unannounced tests may be utilized under the following circumstances:

1. Pre-employment/pre-placement (pre-job for a specific contract) testing will be required of any qualified applicant or candidate as a condition of consideration of employment or may be required prior to being approved to work at any customer's facility, work area or as required by contract or law.
2. If an employee suffers an occupational on-the-job injury (requiring evaluation by a doctor) or following a serious or potentially serious accident or incident in which safety precautions were violated, equipment or property was damaged (including but not limited to automobiles, trucks, and other equipment), unusually careless act was performed, or where the cause was due to an employee or other person's failure to wear prescribed personal protective equipment or follow prescribed safety rules while working on company property or the property of a customer.
3. When a supervisor has reasonable suspicion to suspect that an employee or other person shows signs of possible intoxication, of using or being under the influence of drugs or alcohol, or other articulable facts that would lead a prudent supervisor to be concerned about the individual's safety or the safety of the general public and others due to an employee's physical condition or behavior while working.
4. When the Company has evidence of probable abuse by a number of employees based on information such as an unusual amount of post -accident positive test results, incidents of theft, lost productivity or reports of unexplained personal behavior, or other facts that would lead management to test specific individuals, group, work area, work location or sensitive job classifications due to safety concerns.

5. When an employee or other person is found in possession of suspected illicit or unauthorized drugs and/or alcohol, drug paraphernalia or when any of these items are found in an area controlled or used exclusively by designated employees.
6. Routine, periodic or intermittent testing of all employees to determine the use of any illegal or unauthorized drug, alcohol or other substance prohibited by this policy. This type of testing may also be used when there is reasonable belief to test a specific work group.
7. Random test may be used routinely for all employees to prevent and detect substance abuse. Any form of substance abuse may affect the safety of operations through unsafe work behavior/performance or error in judgment, or substance abuse could jeopardize the safety and well being of either the employee, other personnel or the general public.
8. Government required testing may be routinely utilized by the Company as mandated by the Department of Transportation (DOT), Federal Highway Administration (FHA) or other agencies for those employees working in regulated safety sensitive positions. These positions are classified by *DOT/FHA* regulations as regulated drivers of commercial motor vehicles operating in interstate commerce. Additionally, some states have chosen to apply these regulations to certain drivers who operate commercial vehicles in intrastate commerce. All employees who are required to have a federal commercial driver's license or who drive or have occasion to drive any vehicle which requires hazardous materials placards, or who drive a company truck, or a truck with a trailer with a gross vehicle weight of more than 8000 lbs. (GVWR) are required to have the following tests:
 - a. Pre-employment testing
 - b. Reasonable cause (or suspicion) testing
 - c. Random testing
 - d. Post-accident testing
 - e. Return to duty
 - f. As necessary to comply with the contractual or legal obligations of our customers, clients, additional federal government or individual state drug testing laws. Those employees affected by these types of tests will also be notified as to their applicability of these requirements as information becomes available.
 - g. Post counseling/rehabilitation or return to work medical examinations when an employee returns to work from a long illness, disabling injury, extended absence, reduction in force or as a result of a condition of reinstatement upon completion of a reasonable drug and alcohol treatment or counseling program.

Urine samples for drug and breath samples for alcohol will be collected for testing from time to time, with or without prior announcement as defined by the policy. These samples will be collected by contract medical facilities providing services to Graham Roofing. Medical facilities designated as collection facilities (including after hours and remote location services), and/or professional collection technicians, will collect, process and prepare the specimens for transport to a licensed laboratory for actual testing, using chain of custody procedures. Additionally, in certain circumstances, collections may be taken at the worksite by professional collection specialists or technicians. Collections of this nature may occur, in conjunction with inspections, when the company has evidence of probable abuse by a number of employees at the worksite.

Each initial urine test shall be run by immunoassay (sensitivity test). All specimens identified as positive on the initial test shall be confirmed by a second test using gas chromatography/mass spectrometry (GC/MS) techniques (specificity-type methodology). All first-test positive breath alcohol screen will be confirmed with a second confirmation test, either breath or urine.

All searches, inspections, breath and urine sampling will be performed with concern for each employee's or person's personal privacy, dignity and confidentiality. The results of any program testing will be considered a confidential record disseminated strictly on a need to know basis or as may be legally required. Records shall not be maintained in personnel files. Illegal substances, drugs, stolen property and other prohibited items discovered through these searches may result in the proper law enforcement authorities being advised in this regard (as required by law).

The company may utilize the services of a Medical Review Officer (MRO) to interpret a second-test confirmed positive result as it applies to the employee's explanation. An MRO is a licensed physician who has knowledge of substance abuse disorders and has appropriate medical training to interpret and evaluate an individual's positive test result as it relates to the employee's medical history and any other biomedical information.

The federal Drug-Free Workplace Act of 1988 as well as many state Drug-Free Workplace Acts are applicable to many of our company's operations and it places several requirements on employer/contractors covered by these laws. Each employer or contractor covered by the act must certify to the contracting agency that it has published a statement to employees alerting them that drug use or possession is prohibited in the workplace and that abiding by these terms is a condition of employment.

Federal law requires the company to remind employees about their right of confidentiality to participate in our company EAP program. Employees should be aware that many local hospitals, medical clinics and other social service agencies offer alcohol and drug abuse counseling and rehabilitation programs. The company will publish or provide from time to time information to employees regarding the danger of alcohol and drug abuse in the workplace. The company will not pay for any counseling programs.

Federal law requires as a "condition of employment on a government contract" that employees are required to abide by this policy and must report a criminal drug statute conviction for a violation occurring in the workplace no later than five (5) days after such conviction. In addition our company's policy requires the employee to report any conviction for drug related offenses, regardless of whether or not the violation occurs in the workplace. "Conviction" means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both by any judicial body with the responsibility to determine violation of federal, state or local criminal statutes. The company is required to notify the appropriate contracting agency within ten (10) working days after receiving notice from an employee or a law enforcement agency of a criminal drug statute conviction.

An employee's failure or refusal to report such a conviction as outlined above will be grounds for termination of employment.

The company may require employees and others to participate in such urinalysis, or breathe alcohol test, and search activity in order to assist us in providing a safe, healthful and productive working environment and to comply with federal laws as a condition of continued employment. No employee or person search, urine drug test, breath test, or inspection will be conducted without written consent. However, failure to comply with the provisions of this policy shall be grounds for constructive disciplinary action up to but not limited to written reprimands, and suspensions of discharge from employment. In certain situations (as defined below), discharge may occur even for a first offense violation, except as otherwise provided

in this policy.

Entry onto the company's property, or work areas and locations as described herein constitutes recognition and consent to the right of the company or its authorized representatives to search, inspect, urine test or receive a breath sample from the employee, other persons, and their personal effects such as vehicles, company living quarters, boxes, desks, lockers, briefcases, lunchboxes, food—beverage containers, clothing, and any other property of employees and other persons while entering, on, or departing the premises of the company.

An employee could be subject to discharge or other disciplinary actions at management's discretion for the following:

1. The employee either refuses to submit to a search or inspection, urine drug, breath alcohol as outlined by this policy.
2. The employee has submitted to a test and, in the opinion of the Company and its approved facility, has degraded, diluted, switched, altered or tampered with their sample. It is Graham Roofing's policy that ALL drug screens be retested at the employee's expense if the test comes back degraded, diluted, switched, altered or tampered with in any way.
3. While on company premises, the employee was caught using alcohol, or using, manufacturing, distributing, dispensing, selling or possessing any illegal or unlawful drugs.
4. The employee failed to contact the EAP (regular full-time employees) or a qualified substance abuse care provider within five (5) regular working days after notification of a MPG verified confirmed positive test result.

Any employee found possessing alcohol or possessing, using, being under the influence of, or transporting any unauthorized drugs, or other substances and items in violation of this policy will be subject to disciplinary action anywhere from a written reprimand to a suspension and up to and including discharge of employment as determined solely by management, depending on the surrounding circumstances and seriousness of the offense. Preliminary findings of a policy violation may require that the employee be placed on suspension pending a review of all relevant facts concerning the policy violation.

NOTE: Employees shall always have the opportunity to present an alternative explanation as to the reason for the positive test result. No adverse action will be taken against any employee based on a confirmed positive testing result if a reasonable doubt exists as to either the accuracy or the result or the chain of custody of the sample.

Any regular full-time employee who tests positive for a substance prohibited by this policy as a result of a MRO verified confirmed urine or breath test without an explanation satisfactory to the Company will be offered a referral to an approved counseling or rehabilitation program (EAP) for the first offense only. This will be at the expense of the employee. Any part time employee who tests positive for a substance prohibited by this policy as a result of a MRO verified confirmed urine or breath test without an explanation satisfactory to the Company will be offered an opportunity to seek a qualified substance abuse treatment or counseling program at their expense. However, an employee will not be offered rehabilitation, and the policy will not apply to a first offense where:

1. Violations of the policy occur in connection with a violation of other work or safety rules which would ordinarily result in discharge.

2. The employee's prior disciplinary record in connection with the policy violation would ordinarily result in discharge.

Any first offense referral as a result of substance abuse testing may also require an indefinite suspension of regular employment until the admission to and completion of a reasonable drug and alcohol treatment or counseling program and the satisfactory passing of a return to work substance abuse test. Upon reinstatement, the employee will be subject to routine, periodic, intermittent and unannounced testing for a period of two (2) years following their return to work. Any subsequent (second offense) MRO verified confirmed positive test will result in immediate termination.

NOTE: Federal laws may require a drug free status and monitored aftercare for up to five (5) years if an employee is working on a government project or under D.O.T./D.O.D. guidelines. Those employees who, as the result of these tests, are eligible for this type of discipline will still be subject to discharge for the following policy violations:

1. Refusal or failure to report to an approved counseling or rehabilitation program within five workdays after employee notification of a MRO verified confirmed positive test for any substance prohibited by this policy.
2. Leaving the appropriate treatment or counseling program prior to the successful completion and being properly released for return to work.

Any other person having business with Graham Roofing who refuses to submit to a search, urine, breath alcohol test or is found to be in possession of company or employee property or any of the above-mentioned drugs and unauthorized items will not be allowed to return to any of the Company's premises, properties, facilities or work areas as described above.

Any employee, whose off-duty conduct related to the use, sale, manufacture, distribution, or abuse of any drug, prescription drug, illegal or designer drug, controlled substance, or alcoholic beverage that may or may not result in criminal charges or conviction shall be subject to disciplinary action, up to and including immediate termination, in the Company's sole discretion, if the Company believes that this off duty conduct could possibly:

1. Affect such individual's safe job performance.
2. Jeopardize the safety of other employees, the general public or the Company's property.
3. Reduce the community trust in the ability of the Company to carry out its responsibilities due to the notoriety of the employee's conduct.

It is the intent of this policy to provide employees with the company's viewpoint on behavioral-medical disorders, to encourage an enlightened viewpoint toward these disorders, and to provide guidelines for consistent handling throughout the workforce regarding alcohol and drug usage situations.

Constructive (or progressive) disciplinary measures may also be utilized to provide motivation for employees to seek assistance. However, it is the responsibility of each employee to seek help before alcohol and/or drug problems lead to disciplinary action up to

and including termination of employment. Once a violation of this policy occurs, subsequently using the program on a voluntary basis will not necessarily lessen disciplinary action and may, in fact, have no bearing on the determination of appropriate disciplinary action.

The employee's decision to seek prior assistance from the program will not be used as the basis for disciplinary action and will not be used against the employee in any disciplinary proceeding. On the other hand, using the program will not be a defense to the imposition of disciplinary action where facts proving a violation of this policy are obtained outside of the Employee Assistance Program. Accordingly, the purpose and practices of this policy and the Employee Assistance Program are not in conflict and are distinctly separate in this application. The key is to seek confidential help when you need it.

No employee's job will be placed in jeopardy nor will any employee be subject to disciplinary act for voluntarily requesting help due to substance abuse problems. However, if the affected employee's position (job) or work area has been shut down or the job (or contract) has been completed by the time the worker returns, they shall be offered the next available position that they are qualified for in another work area. All employees who have participated in the Company's Employee Assistance Program will still be expected to maintain satisfactory job performance.

Confidentiality in accordance with Graham Roofing policies will be guaranteed in all aspects of the counseling program. If it becomes necessary for an employee to undergo appropriate medical treatment under the auspices of the Employee Assistance Program, absences will be handled in accordance with the company's standard policies regarding disability, sick leave or leave of absence.

This policy shall be amended as necessary to meet the requirements of any particular federal, state, county, parish, or city law (requirements or contractual obligations with a customer). Those enforcement and disciplinary options outlined in this policy that is prohibited by existing laws or agreements will not be utilized at those particular company work areas or locations. Any additions or deletions to this policy shall be communicated in writing to all affected employees as necessary. Amendments to the policy must have prior approval of the President and/or Board of Directors of Graham Roofing. Exceptions to the policy or amendments to the Administrative or Supervisory Guidelines must have the approval of the President and/or Board of Directors of Graham Roofing.

The President or Supervisor will be responsible for the implementation and administration of this policy. The President or Supervisor will help locate and qualify collection sites and laboratory vendors for specimen collection, processing and testing. All testing, counseling or rehabilitation records shall be kept in locked confidential files that are separate from personnel records. Information disseminated to others shall be on a need to know basis or to defend the Company from challenges as legally required.

Violations of confidentiality will be considered violations of the policy and may result in disciplinary action up to and including discharge.

All vendor and contractor/subcontractor management and supervision shall be responsible and accountable to monitor the safety performance and behavior of their personnel working on any company property or work areas and initiate proper procedures and action necessary as required by contract, applicable laws, or when a reasonable suspicion or belief of substance abuse exists with those in their employ.

This Substance Abuse Prevention/Detection Program, neither as a whole nor any

provision, guideline or procedure contained therein, is to be considered or interpreted as a binding contractual commitment on the part of the Company. Furthermore, Graham Roofing has specifically decided NOT to elect to conduct an employee drug and alcohol testing policy or program pursuant to the provisions of the Mississippi Code Ann. §§71-7-1, et seq. (1972). Through this policy-program, Graham Roofing does not assume or offer to assume any obligations beyond those which may be imposed by applicable law. The Company further reserves the right to alter, amend or discontinue this policy program or any procedure, guideline or provision contained herein, with or without notice, at its sole discretion. Failure to exercise any function in any particular way shall not be considered a waiver of its right to exercise such functions or preclude the Company from exercising that prerogative or function in some other way.

Graham Roofing realizes that those employees, applicants and others with drug and alcohol abuse problems may make up only a fraction of the workforce. We regret any inconvenience that may be caused to the non-abusers by the problems of a few workers. We believe, however, that the benefits derived from the prevention of accidents, the greater safety of employees, our customers, visitors and the rehabilitation or discharge of those who, because of alcohol or drugs, are a potential danger to themselves and others, will more than make up for any inconvenience.

The Company earnestly solicits the understanding and cooperation of all employees in implementing this policy.

**GRAHAM ROOFING
DRUG AND ALCOHOL SCREENING**

**NOTIFICATION AND CONSENT
MEDICAL AUTHORIZATION AND RELEASE**

I HEREBY ACKNOWLEDGE that I have received and read the Company's Substance Abuse Policy and understand that I must abide by it as a condition of employment. I also understand that as part of my application for employment and during my employment I may be required to submit to a drug and/or alcohol test and that submission to such testing is a condition of employment and disciplinary action, including termination, may result if I refuse to submit to such testing, or if the test results in a violation of the Company's Policy concerning substance abuse.

Furthermore, I hereby acknowledge that the Company complies with the provisions of the Mississippi Workers' Compensation Premium Reduction Act of 1997. I understand that failing or refusing to submit to a drug and/or alcohol test may result in denial of workers' compensation and/or unemployment benefits.

THE UNDERSIGNED STATES THAT HE OR SHE HAS READ THE PREVIOUS ACKNOWLEDGEMENT AND UNDERSTANDS THE CONTENTS THEREIN.

EMPLOYEE SIGNATURE

DATE

EMPLOYEE NAME (PLEASE PRINT)

WITNESS

DATE

Rigging Material Handling Safety

GRAHAM ROOFING RIGGING MATERIAL HANDLING SAFETY

Purpose

Many types of cranes, hoists, and rigging devices could be used at Graham Roofing for lifting and moving materials. Graham Roofing's policy is to maintain a safe workplace for its employees; therefore, it cannot be overemphasized that only qualified and licensed individuals shall operate those devices. The safety rules and guidance in this section apply to all operations at Graham Roofing that involve the use of mobile cranes and hoists installed in or attached to buildings and to all Graham Roofing employees, supplemental labor, and subcontractor personnel who use such devices.

Responsibilities

Supervisors are responsible for:

- Ensuring that employees under their supervision receive the required training and are certified and licensed to operate the cranes and hoists in their areas.
- Providing training for prospective crane and hoist operators. This training must be conducted by a qualified, designated instructor who is a licensed crane and hoist operator and a full-time Graham Roofing employee or an outside trainer that has been approved by management.
- Evaluating crane and hoist trainees and submitting a recommendation to the safety coordinator about the future of the trainee in respect to crane operations.
- Ensuring that hoisting equipment is inspected and tested monthly by a responsible individual and that rigging equipment is inspected annually.

Crane and Hoist Operators are responsible for:

- Operating hoisting equipment safely.
- Conducting functional tests prior to using the equipment.
- Selecting and using rigging equipment appropriately.
- Having a valid operator's license on their person while operating cranes or hoists.
- Participating in the medical certification program if needed.

Engineering/Maintenance/Operations Department is responsible for:

- Performing annual maintenance and inspection of all Graham Roofing, Inc cranes and hoists that are not covered by a program with maintenance responsibility.
- Conducting periodic and special load tests of cranes and hoists.
- Maintaining written records of inspections and tests, and providing copies of all inspections and test results to facility managers and building coordinators who have cranes and hoists on file.
- Inspecting cranes and hoists following modification or extensive repairs (e.g., a replaced cable or hook, or structural modification.)

- Scheduling a non-destructive test and inspection for crane and hoist hooks at the time of the periodic load test, and testing and inspecting before use of new replacement hooks and other hooks suspected of having been overloaded. The evaluation, inspection, and testing may include, but are not limited to visual, dye penetrant, and magnetic particle techniques referenced in ASME B30.10 (Hooks, Inspection and Testing.)
- Maintaining all manuals for cranes and hoists in a central file for reference.

Safety Department is responsible for:

- Conducting training for all crane and hoist operators.
- Issuing licenses to crane and hoist operators.
- Periodically verifying monthly test and inspection reports.
- Interpreting crane and hoist safety rules and standards.
- Training appropriate personnel on crane signaling

Safe Operating Requirements

All workers who use any Graham Roofing crane or hoist shall have an operator's license. Graham Roofing issues licenses for authorized employees who have been specifically trained in crane and hoist operations and equipment safety.

Crane and Hoist Operators

To be qualified as a crane and hoist operator, the candidate shall have received hands-on training from a licensed, qualified crane and hoist operator. Upon successful completion of training, the certified candidate will be issued a license. Crane and hoist operators must renew their license every three years by satisfying the requirements described above.

Records

Graham Roofing's main office shall maintain records for all cranes, hoist and rigging equipment.

GRAHAM ROOFING DAILY CRANE INSPECTION LOG
DAILY CRANE LOG

MONTH OF: _____		EQUIPMENT #: _____												MODEL #: _____																	
ITEM	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
Engine Oil																															
Engine Water																															
Tires																															
Air Supply																															
Hydraulic Oil Reserve																															
Hydraulic Leaks																															
Cable Condition																															
Boom Lubricated																															
Anti-Two Block System																															
Glass Condition																															
Turn Table Lub.																															
Gauges																															
Exhaust System																															
Steering Condition																															
Electrical System																															
Battery Condition																															
Jib Condition																															
Safety Latches																															
Back Up Alarm																															
Load Chart																															
Warning Labels																															
Swing Radius Barricaded																															
(2) 5lb (40bc) Fire Extinguisher																															
Operating Instructions																															
All Lights																															
All Fluid Levels																															
OPARATORS INITIALS																															

If any item is faulty, use remark section below

Remarks (misc.): _____

MONTHLY CRANE INSPECTION

MAKE: _____

MODEL: _____

SERIAL NO: _____

INSPECTOR: _____

MAX. CAPACITY: _____

DATE: _____

BOOM TRUCK CRANE

GENERAL

GUARDS/COVERS
INTERNAL/EXTERNAL LIGHTS
INSTRUCTIONS/WARNING DECALS

DRIVER'S CAB

ACCESS/GRAB RAILS/STEPS
GLASS
WINDSHIELD WIPERS
MIRRORS
FIRE EXTINGUISHER
POWER TAKE-OFF
PARKING BRAKE
INSTRUMENTS/GAUGES
ELECTRICAL SWITCHES
HORN
OPERATORS MANUAL

TRUCK ENGINE

EXHAUST SYSTEM
BELTS/HOSES
GUARDS/COVERS

CHASSIS/CARRIER

TRANSMISSION
DRIVE LINE
TIRES/WHEELS
MAIN FRAME MEMBERS
HYDRAULIC HOSES/FITTINGS
HYDRAULIC OIL LEVEL
GUARDS/COVERS
BACK UP ALARM

OUTRIGGERS

BOXES
BEAMS
CYLINDERS
FLOATS/PADS
HYDRAULIC HOSES/FITTINGS
HOLDING VALVES
CAUTION/WARNING SIGNS

OPERATOR'S STATION

GRAB RAILS/STEPS/PLATFORM
ANTI-SKID SURFACE
FIRE EXTINGUISHER (5BC or higher)
ELECTROCUION WARNING SIGN
CONTROLS IDENTIFIED
ACCELERATOR-THROTTLE CONTROL
HYDRAULIC LEAKS
HORN
LOAD CHART

UPPER STRUCTURE

BOOM ANGLE INDICATOR
BOOM LENGTH INDICATOR
OVERLOAD PROTECTION
CRANE LEVEL INDICATOR
ANTI-TWO BLOCK DEVICE
TURNABLE
MOUNTING
TURRET
HYDRAULIC PUMP
HYDRAULIC HOSES
ELECTRICAL WIRING
HOIST BRAKE
HOIST MOTOR
HOIST WRAPPING ON DRUM
SWING GEAR BOX
ELECTROCUTION WARNING SIGN

MAIN BOOM

LIFT CYLINDERS
TELESCOPING CYLINDERS
HYDRAULIC HOSES/FITTINGS
HOLDING DEVICE
BOOM SECTIONS ALIGNMENT
WEAR PADS
SHEAVES
HOIST LINE DEAD END
WIRE ROPER RETAINER
BOOM HINGE PIN
BOOM HEAD SECTION

JIB

SHEAVES
WIRE ROPE RETAINERS
STRUCTURE

LOAD BLOCK & HOOK

CAPACITY MARKING
WEIGHT MARKING
SHEAVES
SAFETY LATCH
WEDGE SOCKET & END FITTING

OVERHAUL BALL & HOOK

CAPACITY MARKING
WEIGHT MARKING
SAFETY LATCH
WEDGE SOCKET & END FITTING

NOTES: _____

O.K. = SATISFACTORY

N/A = NOT APPLICABLE

X= UNSATISFACTORY

Forklift Safety Training Program

GRAHAM ROOFING

FORKLIFT SAFETY TRAINING AND CERTIFICATION PROGRAM

Purpose:

To ensure that any operator of lifting equipment has received and understands the safety requirements, limitations and precautions of using the assigned equipment. The program shall always meet or exceed the requirements of the OSHA Power Industrial Truck Standard.

Responsibilities:

Management will be responsible for the administration of this program and to ensure compliance with all Federal, State and Local regulations on Power Industrial Truck use in the workplace.

The safety manager shall maintain training records and certification cards on all certified operators. The safety manager shall coordinate initial, refresher training every third year and as needed safety training and certification for selected personnel.

A person competent in the process shall oversee the driving skills assessment of the certification program and ensure that a maintenance and safety check of the vehicle has been done prior to use.

Supervisors shall report any deficiencies in driving skills to their immediate supervisor and have the noted individual reassessed before being allowed to operate again.

Forklift operators shall at all times follow the posted safety warnings while operating a lift truck and at the very minimum following the safe operating guidelines listed in 29 CFR 1910.178 (m). The operator also understands the importance of not operating the lift when impaired by any outside source or mind or physical alternating drug use.

Training requirements:

All employees that are assigned to operate a powered industrial lift truck must be mentally, emotionally and physically capable to do so. Management prior to assigning anyone the task of operation shall make this determination. Each person assigned must be fully trained in the following:

1. Truck-related topics:
 - a. Operating instructions, warnings, and precautions for the types of truck the operator will be authorized to operate;
 - b. Differences between the truck and the automobile;
 - c. Truck controls and instrumentation: where they are located, what they do, and how they work;
 - d. Engine or motor operation;
 - e. Steering and maneuvering;
 - f. Visibility (including restrictions due to loading);
 - g. Fork and attachment adaptation, operation, and use limitations;
 - h. Vehicle capacity;
 - i. Vehicle stability;

- j. Any vehicle inspection and maintenance that the operator will be required to perform;
 - k. Refueling and/or charging and recharging of batteries;
 - l. Operating limitations;
 - m. Any other operating instructions, warnings, or precautions listed in the operator's manual for the types of vehicle that the employee is being trained to operate.
2. Workplace-related topics:
- a. Surface conditions where the vehicle will be operated;
 - b. Composition of loads to be carried and load stability;
 - c. Load manipulation, stacking, and unstacking;
 - d. Pedestrian traffic in areas where the vehicle will be operated;
 - e. Narrow aisles and other restricted places where the vehicle will be operated;
 - f. Hazardous (classified) locations where the vehicle will be operated;
 - g. Ramps and other sloped surfaces that could affect the vehicle's stability;
 - h. Closed environments and other areas where insufficient ventilation or poor vehicle maintenance could cause a buildup of carbon monoxide or diesel exhaust;
 - i. Other unique or potentially hazardous environmental conditions in the workplace that could affect safe operation.
 - j. The requirements of 29 CFR 1910 Subpart N.

Recordkeeping:

The safety manager shall make a copy of any training attendance sheets along with the names, signatures of attendees, date of training, name of trainer generated by this program. A wallet sized certificate shall be made and given to each operator. A copy of the written test and the hands on test shall be kept with the training records for each approved operator.

On the Job Training: Any person needing training on the operation of a forklift may be allowed to do so only if approved by the safety manager and done under the direct supervision of the assigned observer.

GRAHAM ROOFING DAILY FORKLIFT INSPECTION LOG

MONTH OF _____ EQUIPMENT NO _____

PRE - OPERATION CHECKLIST

ITEMS WITH * ARE NO-GO CRITICAL SAFETY OR MAINTENANCE INDICATORS

- OK - Satisfactory
- X - Needs Repair (document in notes)
- NA - Not applicable

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
Cursory visual inspection																															
Overall cleanliness																															
MAINTENANCE ITEMS																															
Oil Pressure	*																														
Engine Oil	*																														
Batteries, electrolyte level																															
Hydraulic system / hoses no leaks																															
Hydraulic fluid levels	*																														
Muffler / exhaust system																															
Instrument / gauges																															
Radiator fluid levels	*																														
Fuel level																															
Fuel tank / cap in place																															
Wheels / tires/ lugs																															
Electrical System																															
SAFETY FUNCTION ITEMS																															
Operating control mechanisms																															
Fire extinguisher																															
Manufacturer load capacity chart																															
Steering mechanism	*																														
Sheaves / guards																															
Clutches / brake	*																														
Parking brake	*																														
Horn	*																														
Fork operational function	*																														
Condition of mast / carriage / forks																															
Lights, head / tail / brake / flashers																															
Seat belt	*																														
Operator Name																															

NOTES: _____

REMINDER BUCKLE YOUR SEATBELT WHEN OPERATING THE FORKLIFT

Personal Protective Equipment

GRAHAM ROOFING

PERSONAL PROTECTIVE EQUIPEMENT (PPE)

Purpose: To help ensure that employees are properly protected from hazards they are exposed to during their assigned duties. Supervisors shall ensure engineering controls are considered first. PPE is the last line of defense.

Responsibilities:

- Management – is responsible for:
 - Evaluating the work area assigned for the need for PPE
 - Ensuring that each hazard is identified
 - Ensuring exposure to the hazards that cannot be eliminated is minimized
 - Purchasing the required PPE needed to protect exposed employees and safety coordinators
- Site Supervisors – are responsible for:
 - Training employees in the use of PPE and required elements of this program
 - Implementing this program on site
 - Inspecting all PPE used and ensuring that it is adequate for the level of protection needed
 - Ensuring that the PPE used is in good working condition
 - Ensuring that the PPE is stored, cleaned and maintained according to all requirements
- Employees – are responsible for:
 - Use of proper PPE
 - Making sure they are wearing the proper PPE for the job. Check with the safety coordinator if you are not sure.
 - Inspecting PPE before and after each use
 - Taking care of PPE at all times
 - Cleaning all PPE after use
 - Reporting damaged or lost PPE
 - Storing PPE in clean dry air – free from exposure to sunlight or contaminants
 - Using, wearing and maintaining the PPE in an authorized and appropriate manner
 - Notifying supervision anytime that changes in the work place direct a re-evaluation of the need for PPE
 - Employee owned PPE is not allowed.

PPE Selection- management and supervisors must do an evaluation of the work area and assign tasks to determine the type of PPE needed. The following is a guideline in the selection of PPE:

- Choose PPE to match the hazard
- Obtain advice on proper selection
- Institute workplace trials
- Consider the physical comfort of PPE
- Evaluate cost considerations of PPE usage

- Ensure PPE meets standards / certification (e.g., CSA, CGSB, NIOSH, ANSI)
- Ensure program included the individual fitting of PPE

Maintenance- the following must be considered anytime you wear PPE

- Ensure that workers know how to perform regular maintenance and inspection of their PPE
- Verify that all users, supervisors, selectors, buyers, and storekeepers are trained

Auditing Program- PPE must be inspected prior to use and as needed, however periodic inspections shall be made by a competent person of all PPE used in the work force. The following guidelines shall be followed for this audit:

- Review the program annually
- Review and compare production and safety performance records
- Inspect PPE (with the exception of daily use items such as safety glasses, hard hats, gloves etc.)

PPE Assessments- PPE is assessed before the start of each job and training is performed accordingly.

Emergency Response Plan

GRAHAM ROOFING EMERGENCY RESPONSE PLAN

Preplanning for emergencies and training employees on the proper response to such emergencies reduces the risk of and severity of injuries sustained during the emergency. Graham Roofing is dedicated to preventing all incidents that lead to emergencies and injuries; however, when these situations arise the response must be positive and correct. The following procedures are to be followed during such emergencies as:

- A. Medical emergencies
- B. Fire
- C. Severe Weather
- D. Emergencies requiring relocation
- E. Incident/injury investigation

- a. Medical emergencies – First aid facilities at the site are to be provided in accordance with regulations. Project folder will contain information about medical facilities in the area with capabilities to treat minor injury. The ambulance service (911) will be called when an injury occurs from fall, fire, electrical shock or any other injury in which the injured person is immobile. No attempt is to be made by job personnel to move an injured person except to prevent shock, to remove from a further immediately hazardous situation, or to administer CPR procedures by a qualified person. The following persons are currently certified to perform CPR/Basic 1st Aid:

Derek Cobb
Leslie Cochran
James Cunningham
Joe Lee Miller

Rita Tilley
Manuel Villanueva
Henry Wallace
Brian Walters
Ken Wright

- b. Fire – To report a fire, dial 911. All local, state, and federal fire prevention regulations will be complied with. No open warning fires will be permitted. Fire extinguishers will be located in all job trailers and commercial vehicles and on site when work is being performed. Additional extinguishers will be located in areas where the need is identified. **All** employees shall evacuate immediately.
- c. Severe weather – in the event of severe weather all lifting operations, scaffold use and aloft work shall be stopped until cleared by the superintendent. When lightening is present, work shall stop until an evaluation is made by the site competent person as to the safety of the employees. During all lightening storms employees should seek shelter and report to the supervisor of their location.

- d. Emergencies requiring relocation – Any incident resulting in the need to relocate employees to the nearest established mustering point shall be used. Roll call will be performed upon relocation (the foreman time sheet will be used to account for the employees on the specific job). No employee is to leave the site without notifying their supervisors as to their location in the event a search is needed.
- e. Incident / injury investigation –
- i. All injuries must be reported to the job supervisor immediately no matter the severity. A complete written description as to how the incident happened and the remedial action taken to prevent recurrence shall be done no later than one (1) business day following the accident.
 - ii. Injured employees' supervisors are to notify the designate person immediately and action taken to prevent a recurrence of accident.
Designate people at each location are:
 - West Point – Christee Holbrook
 - Tupelo – Brian Walters
 - iii. Any employee injured on the job will be required to have a drug and alcohol test. If the injury was caused by another employee, that employee will also be drug and alcohol tested.
 - iv. Any incident in which three or more employees are hospitalized or results in a fatality is to be reported to OSHA within 8 hours by the Safety Director.
 - v. All accidents that result in injury to workers, regardless of their nature shall be investigated and reported. It is an integral part of any safety program that documentation takes place as soon as possible so that the cause and means of prevention can be identified to prevent recurrence.
 - vi. In the event that an employee falls or there is some other related, serious incident occurring, this plan shall be reviewed to determine if additional practices, procedures, or training need to be implemented to prevent similar types of incidents from occurring.

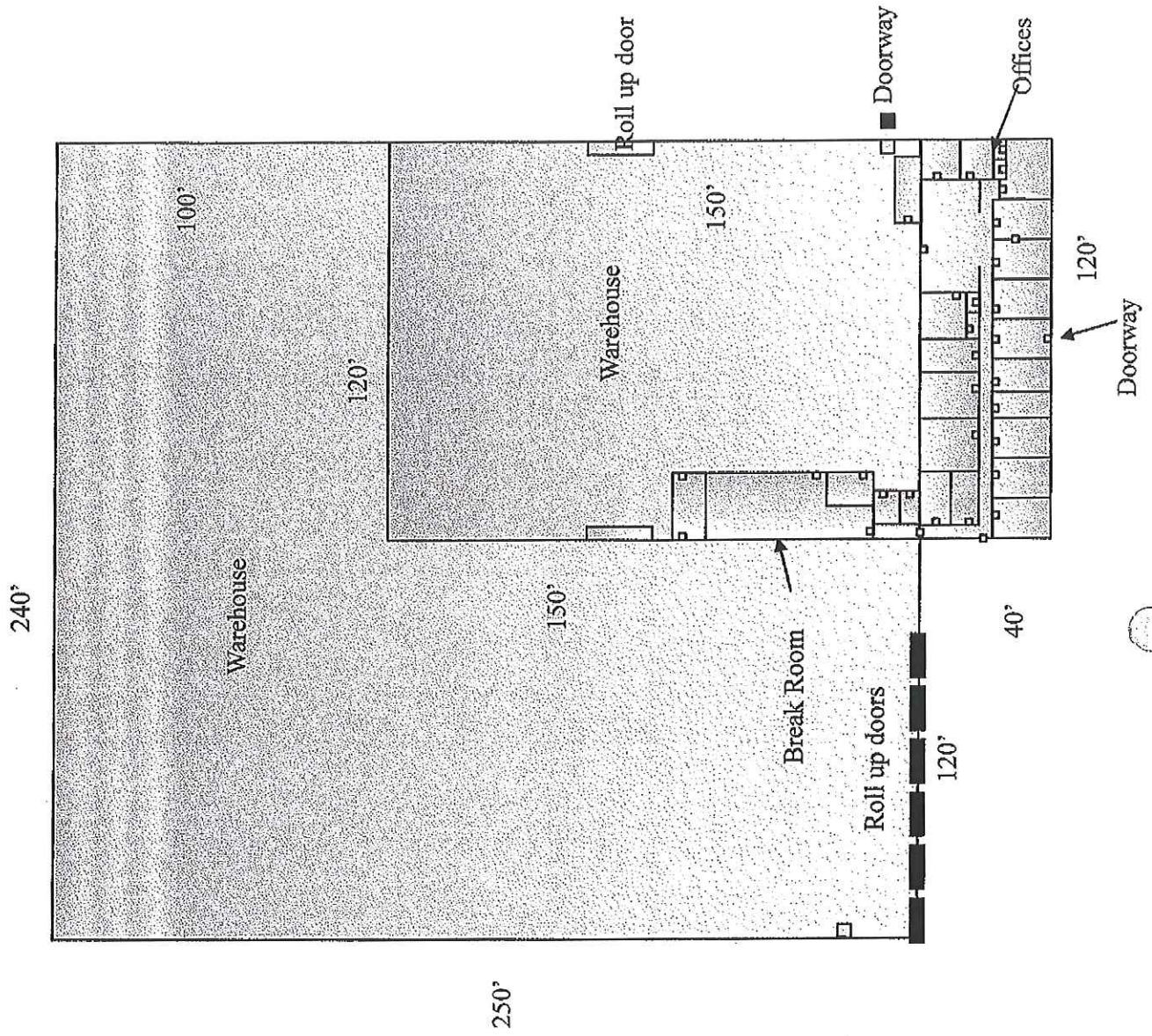
All employees will be trained on the Emergency Response procedure upon hire and if their duties with Graham Roofing change. The Emergency Response plan will be reviewed for needed changes if an accident occurs or as needed but no less than annually.

EMERGENCY ACTION PLAN (SITE SPECIFIC)
FOR

GRAHAM ROOFING, INCORPORATED
769 West Tibbee Road
West Point, MS 39773

- In the event of an emergency, employees can expect to be alerted by:
 - Fire alarm – security alarm will sound an alarm to notify of possible fire on the property. The security alarm panels should identify the problem area.
 - Tornado or other bad weather – public address system announcement if applicable
 - General evacuation – a verbal announcement will be made over the intercom or by other means
- In the event of a fire or other emergency, ALL employees shall evacuate immediately.
- In the event of a tornado or other bad weather, ALL employees on the property should report to the employee break room.
- In the event of an emergency evacuation from the building, employees shall evacuate by means of the nearest available marked exit. Upon evacuation, employees are to gather in the front parking lot on the south end of the building. Roll call will be performed to account for all employees (current list attached).
- Portable fire extinguishers are provided throughout the building for employee use. In the event of fire, any employee may use fire extinguishers to attempt to extinguish the fire before evacuating.
- The following employees are currently certified to perform CPR/1st aid:
 - Derek Cobb
 - James Cunningham
 - Joe lee Miller
 - Rita Tilley
 - Henry Wallace
 - Ken Wright
- For further assistance with emergency evacuation procedures, the following individuals may be contacted:
 - Bobby Hooks 662-574-7127
 - Lefty Cobb 662-574-7303
 - Henry Wallace 662-574-8691
 - Robert Sharp 662-574-7300

Graham Roofing
769 West Tibbee Road
West Point, MS 39773
phone 662/492-9555



EMERGENCY ACTION PLAN (SITE SPECIFIC)
FOR

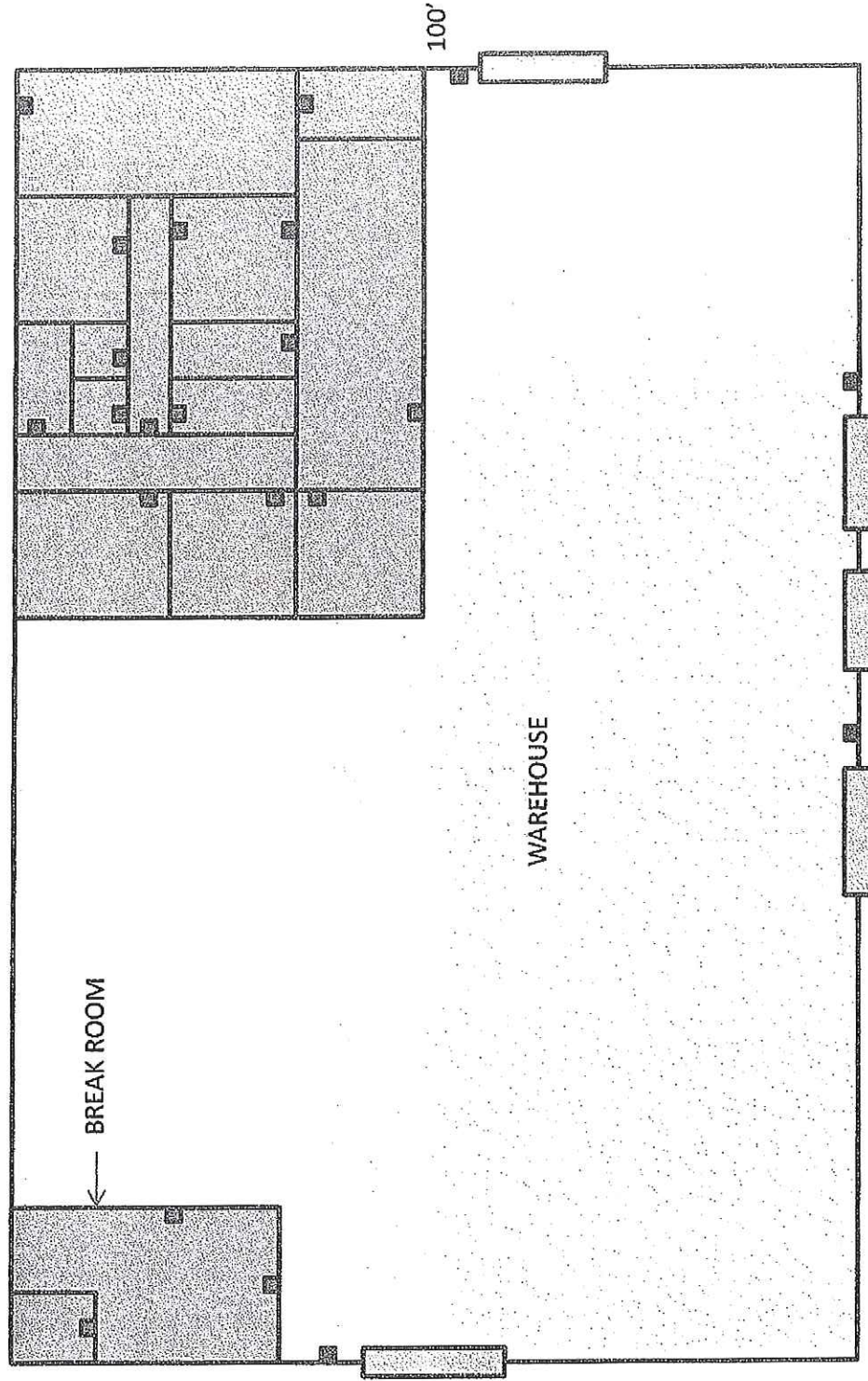
GRAHAM ROOFING, INCORPORATED
136 Bauhaus Drive
Saltillo, MS 38866

- In the event of an emergency, employees can expect to be alerted by:
 - Fire Alarm – A verbal announcement will be made over the intercom or by other means
 - Tornado or other bad weather – Public address system announcement if applicable or a verbal announcement will be made over the intercom.
 - General evacuation – A verbal announcement will be made over the intercom or by other means
- In the event of a fire or other emergency, ALL employees shall evacuate immediately.
- In the event of a tornado or other bad weather, ALL employees on the property should report to the “War Room”.
- In the event of an emergency evacuation from the building, employees shall evacuate by means of the nearest available marked exit. Upon evacuation, employees are to gather at the South end of the building. Roll call will be performed to account for all employees (current list attached).
- Portable fire extinguishers are provided throughout the building for employee use. In the event of fire, any employee may use fire extinguishers to attempt to extinguish the fire before evacuating.
- The following employees are currently certified to perform CPR/1st aid:
 - Leslie Cochran
 - Manuel Villanuevo
 - Brian Walters
- For further assistance with emergency evacuation procedures, the following individuals may be contacted:
 - Benny Campbell 662-322-8229
 - Brian Walters 662-231-6184

GRAHAM ROOFING
136 BAUHAUS DR.
SALTILLO, MS 38866
PH. 662-869-0012

■ EXIT

200'



Safety Disciplinary Program

GRAHAM ROOFING SAFETY DISCIPLINARY PROGRAM

Violations of company and safety policies will not be tolerated. Failure to comply with stated policies and procedures will subject the employee to disciplinary procedures. The following are **guidelines only** for disciplinary action, if the offense is of a serious enough nature immediate termination of employment may take place or other action at management's discretion:

- 1st Offense** - Written warning and retraining
- 2nd Offense** - Unpaid Layoff - number of days to be determined by management
- 3rd Offense** - Dismissal or any combination of any of the above actions.

The supervisor when taking disciplinary action will use the attached form.

EMPLOYEE WARNING REPORT

EMPLOYEE'S NAME:

DATE OF WARNING:

TYPE OF VIOLATION:

☐ Attendance ☐ Tardiness ☐ Work Quality ☐ Carelessness
☐ Safety ☐ Disobedience ☐ Other _____

VIOLATION DATE:

VIOLATION TIME:

PLACE VIOLATION OCCURRED: _____

COMPANY STATEMENT:

EMPLOYEE'S STATEMENT: _____

I have read this warning report and understand it.

Employee

Supervisor

EMPLOYEE WARNING REPORT

EMPLOYEE'S NAME:

DATE OF WARNING:

TYPE OF VIOLATION:

☐ Attendance ☐ Tardiness ☐ Work Quality ☐ Carelessness
☐ Safety ☐ Disobedience ☐ Other

VIOLATION DATE:

VIOLATION TIME:

PLACE VIOLATION OCCURRED:

COMPANY STATEMENT:

EMPLOYEE'S STATEMENT:

I have read this warning report and understand it.

Employee

Supervisor

New Hire & Continuing Safety Training

GRAHAM ROOFING

NEW HIRE & CONTINUING SAFETY TRAINING REQUIREMENTS

Each new employee must attend New Hire Safety Orientation upon hire. Each new employee must be trained on the following subjects and this training documented prior to the start of any work:

Hazardous Communication Program

Bloodborne Pathogen

Scaffolding Safety

Electrical Safety Program

Fall Protection Program

Emergency Response

Substance Abuse Policy

This training must be documented using the Graham Roofing Training attendance form or similar form found on the next page. This form must contain the employees printed name and signature along with the name and signature of the trainer.

Toolbox talks shall be held at the first opportunity (Monday morning) with all Graham Roofing employees and subcontractors. These meetings are designed to provide continuing safety education and should last approximately 10 to 15 minutes. The topics should emphasize the hazards anticipated on the job and be geared towards addressing these hazards. Safety awareness should be the key focus of these talks. Recent accidents should be reviewed. The review of recent accidents tends to give a great deal of realism to the training process. **MAKE SURE A SIGNED SAFETY MEETING REPORT IS FILLED OUT AND SIGNED BY ALL ATTENDEES.** Attendees **MUST** sign in their own handwriting. **DO NOT** sign for them!

GRAHAM ROOFING GENERAL SAFETY PRECAUTIONS

Due to the changing conditions on the job sites it is impossible to address each safety issue properly in this program. Therefore the assigned supervisor must cover the following areas of safety with each newly assigned employee. The list is not inclusive, any pertinent safety issue needs to be added to the list and covered. Then the employee should be given an oral testing of his/her understanding of each topic and sign below before being allowed to start work. Any signs that the employee does not fully understand each area will require retraining in that area.

1. Specific client requirements
2. Scaffolding safety
3. Traffic and vehicle operations
4. Designated smoking, parking and eating areas
5. Required work permits
6. PPE
7. Fire Extinguisher use and placement
8. Accident/injury reporting
9. Emergency procedures
10. Housekeeping
11. Trench safety
12. Ladder use
13. Dress requirements
14. Rigging and lifting safety
15. Electrical safety and the use of GFCI protection
16. Compressed gas cylinder safety
17. Other areas covered by not listed:

I have received verbal instruction on the safety topics listed above and understand my role in each of these areas. I also understand that it is my responsibility to ask my supervisor for clarification when I do not fully understand these requirements. I understand that I must report to my supervisor any unsafe act or condition witnessed by myself and any injury that I am aware of. I have also received a copy of the Graham Roofing safety program manual.

Printed Name

Signature

Date

Supervisor Signature

Miscellaneous

GRAHAM ROOFING WORKER'S COMPENSATION PROCEDURES

Whenever an employee is injured, no matter how minor the injury may seem, the following procedures should be followed:

1. An injured employee must report the injury immediately to the designated person at his location and get necessary treatment. If the employee is unable, his immediate supervisor is responsible for reporting.
2. The designated person is responsible for having drug and alcohol tests performed on all injured employees. If the injury was caused by another employee, that employee will also be tested.
3. Effective July 1, 2012, the Mississippi Senate Bill 2576 amends Section 71-3-121 as follows;

“ (1) In the event that an employee sustains an injury at work or asserts a work-related injury, the employer shall have the right to administer drug and alcohol testing or required that the employee submit himself to drug and alcohol testing. If the employee has a positive test indicating the presence, at the time of injury, of any drug illegally used or the use of a valid prescription medication (s) taken contrary to the prescriber's instructions and/or contrary to label warnings, or eight one-hundredths percent (.08%) or more by weight volume of alcohol in the person's blood, it shall be presumed that the proximate cause of the injury was the use of a drug illegally, or the use of a valid prescription medications (s) taken contrary to the prescriber's instructions and/or contrary to label warnings, or the intoxication due to the use of alcohol by the employee. If the employee refuses to submit himself to drug and alcohol testing immediately after the alleged work-related injury, then it shall be presumed that the employee was using a drug illegally, or was using a valid prescription medication (s) contrary to the prescriber's instructions and/or contrary to label warnings, or was intoxicated due to the use of alcohol at the time of the accident and that the proximate cause of the injury was the use of a drug illegally, or the use of a valid prescription medication (s) taken contrary to the prescriber's instructions and/or contrary to label warnings, or the intoxication due to the use of alcohol of the employee. The burden of proof will then be placed upon the employee to prove that the use of drugs illegally, or the use of a valid prescription medication (s) taken contrary to the prescriber's instructions and/or contrary to label warnings, or intoxication due to the use of the use of alcohol was not a contributing cause of accident in order to defeat the defense of the employer provided under Section 71-3-7.

(2) The results of the drug and alcohol tests, employer-administered or otherwise, shall be considered admissible evidence solely on the issue of causation in the determination of the use of drugs illegally, or the use of a valid prescription medication (s) taken contrary to the prescriber's

instructions and/or contrary to label warnings, or the intoxication due to the use of alcohol of an employee at the time of injury for workers' compensation purposes under Section 71-3-7.

(3) No cause of action for defamation of character, libel, slander or damage to reputation arises in favor of a person against an employer under the provisions of this section."

4. Designated people at each location are:

West Point – Christee Holbrook
Saltillo – Brian Walters

5. Within one (1) business day following the accident, the designated person should take written statements from the injured employee, his direct supervisor and any witnesses.
6. The designated person will complete an incident report and send to Christee in the West Point office. Also, the designated person is responsible for notifying key people at his location. Do not rely on anyone else to do this!!!
7. Based on injuries that have occurred injured employees will be retrained in applicable safety practices by safety officers.
8. If the injured employee sees a doctor, he cannot come back to work until he brings a written release from the doctor. The availability of light duty will be determined on a case by case basis.
9. Depending on the severity of the injury, Bobby Hooks will decide if the claim will be turned over to workers' comp insurance. Therefore, initially, all medical bills and doctor's notes should be sent to the West Point office.
10. Once workers' comp insurance gets involved, Graham Roofing is no longer responsible for processing the claim. However, the designated person should remain in contact with the employee on a weekly basis and should report his status to Christee.
11. The designated person at each office must make sure that all employees from his location understand:
 - a. Workers' comp will not pay the employee for missed wages until the employee has been off work for two weeks.
 - b. The payment for missed wages is approximately 2/3 of the employee's average wages for 52 weeks prior to the accident.
 - c. Payment will come from the insurance company, not Graham Roofing.
 - d. Workers' comp does not require employees, who have returned to work, be paid for time missed for doctor's appointments.

WORKERS' COMPENSATION POLICY / PROCEDURE

I have received a written copy of Graham Roofing's policy/procedure on Workers' Compensation. I fully understand the terms of this policy/procedure and agree to abide by them.

Employee Name (Print): _____ Date: _____

Employee Signature: _____

Witness Signature: _____

Electronic Equipment Use While Driving

Policy

Graham Roofing advocates safe and responsible driving habits. This includes not only adherence to traffic laws, speed limits and the use of seat belts, but also to limiting distractions while operating a motor vehicle through the use of handheld electronic devices.

It is the policy of Graham Roofing that no employee will be permitted to use any type of handheld electronic device while operating a commercial motor vehicle (CMV), a Graham Roofing vehicle or while driving their personal vehicle on Graham Roofing business.

This includes, but is not limited to, wireless phones, laptops, tablets, GPS systems, calculators, on-line e-mail, pagers, pda's, and any other communication or entertainment devices.

Responsibility

It is the responsibility of management to review this policy with every existing employee as well as new hires.

It is the responsibility of all Graham Roofing employees to adhere to this policy when in Graham Roofing vehicles or conducting Graham Roofing business in their personal vehicles.

Procedure

Guidelines

In order to foster a safe driving environment and to protect the welfare not only of our employees but other persons whose safety could be jeopardized by distracted driving, the following guidelines will be used:

- Graham Roofing employees are prohibited from using text messaging, email or any similar form of electronic communication while operating a motor vehicle on Graham Roofing business.
- Graham Roofing employees are prohibited from using a cell phone while operating a motor vehicle on Graham Roofing business. (unless such use is through a hands free device.)

- The only exception to the above prohibitions is an emergency call placed to Graham Roofing and/or 911 for situations such as a traffic accident, road hazard, a medical emergency or a fire. In such cases, the communication should be as short as reasonably necessary to communicate the nature of the emergency, location and other vital information.

Safety Precautions

Graham Roofing employees are generally encouraged to adhere to the following behaviors and safety precautions while operating a Graham Roofing motor vehicle:

- Attempt to make all calls or other communications before departing on a trip or after arriving at your destination.
- Consider turning off, putting on silent or vibrate, wireless phones or other devices before starting the vehicle.
- Pull over to a safe place and put the vehicle in **"Park"** if a call or text message must be made or received while on the road.
- Consider modifying your voice mail greeting to indicate that you are unavailable to answer calls or return messages while driving.
- Inform customers, clients, associates and business partners of this policy as an explanation of why calls may not be returned immediately.
- Avoid the use of cell phones in hazardous conditions due to weather, road conditions, or traffic congestion and conditions.
- Do not program nor adjust any GPS system, smartphone, MP3 player, or any other electronic or entertainment device while driving.

Implementation

Graham Roofing will inform each existing employee and new hire as to the requirements of this policy. Graham Roofing will document the time and date that this policy is reviewed with each employee. A copy of the signed document will be retained in the employees Driver Qualification File and Personnel File.

- Any employee found violating this policy will be subject to disciplinary action up to and including termination.
- Any ticket received by a driver, for the illegal use of a cell phone, electronic or entertainment device, will be the sole responsibility of the driver and must be reported to Graham Roofing within 24 hours of its issuance.
- Failure to notify Graham Roofing will result in disciplinary action up to and including termination.

Acknowledgement on the Use of Electronic Equipment While Operating a Motor Vehicle

Graham Roofing is concerned about the safety and well-being of its employees. This is so important that violations of this policy will be considered serious and may result in disciplinary action up to and including termination. The following Statement of Acknowledgement confirms you have read and fully understand Graham Roofing's policy. Please sign and return it to your supervisor. If you have any questions regarding this policy please contact your supervisor.

MOTOR VEHICLE SAFETY POLICY ACKNOWLEDGEMENT

I have received a written copy of Graham Roofing's policy on the Use of Electronic Equipment While Operating a Motor Vehicle. I fully understand the terms of this policy and agree to abide by them.

Employee Name (Print): _____ Date: _____

Employee Signature: _____

Supervisor Signature: _____