2021

Injury & Illness Prevention Safety Procedure

ALPROEM

ENGINEERING CONTRACTORS CORP.

SOP - 1

Last Review

1/15/2021

Table of contents

1. **Purpose and Scope**
2. **Responsibilities**
3. **Compliance**
4. **Communication**
5. **Hazard Identification and Evaluation**
6. **Hazard Correction**
7. **Accident Reporting/Investigations**
8. **Training and Instruction**
9. **Record keeping**
10. **Resources**

Reference: Puerto Rico Occupational Safety and Health Act Regarding the Injury and Illness Prevention Program, Act number 16 of August 5, 1975 known as PROSHA.

1. PURPOSE / SCOPE

Per Puerto Rico Occupational Safety and Health Act, Law number 16 of August 5, 1975 known as PROSHA, **ALPROEM Engineering Contractors, Corp.** has adopted an Injury and Illness Prevention Program (IIPP), which describes specific requirements for program responsibility, compliance, communications, hazard assessment, accident/exposure investigations, hazard correction, training, and recordkeeping. **ALPROEM** with Main offices at Bayamón, P.R. complies with the Law num. 16 of August 5, 1975 PROSHA of the Puerto Rico Code of Regulations, strives to maintain a safe and healthful working environment, and has implemented this Injury and Illness Prevention Program (IIPP) for this purpose.

United States and Puerto Rico laws, as well as Company policy, make the safety and health of our employees the first consideration in all aspects of our business. Safety and health must be a part of every operation, and is every employee's responsibility at all levels. It is the intent of **ALPROEM Engineering Contractors, Corp.** to comply with all laws concerning the operation of the business and the health and safety of our employees and the public. To accomplish this, we must constantly be aware of conditions in all work areas that can produce or lead to injuries, and ensure:

- No employee is required to work at a job known to be unsafe or dangerous to their health.
- Employee cooperation in detecting hazards, reporting dangerous conditions and controlling workplace hazards.
- Employees inform their supervisor immediately of any situation beyond their ability or authority to correct.
- No employee is disciplined or suffers any retaliation for reporting a safety violation in good faith.

1.1 SAFETY FIRST PRIORITY

The personal safety and health of each employee at **ALPROEM Engineering Contractors, Corp.** is our primary importance. Prevention of work-related injuries and illnesses is of such importance that, whenever necessary, it will be given precedence over any other aspect of our operations. To the greatest degree possible, management will provide the resources required to ensure the personal safety and health of each employee.

1.2 INDIVIDUAL COOPERATION NECESSARY

ALPROEM Engineering Contractors, Corp. maintains a safety and health program conforming to the best practices in our industry. To be successful, such a program must embody proper attitudes toward injury and illness prevention on the part of supervisors and employees. It requires cooperation in all safety health matters, not only between employer and employee, but between the employee and all co-workers. Only through such a cooperative effort can a safety program in the best interest of all be established and preserved. Safety is a responsibility that must be shared equally and without exception.

1.3 SAFETY PROGRAM GOALS

The only acceptable level of safety performance is one that prevents injuries. Recognizing that hazards are inherent in nearly every work situation, the objective is to control risks in the workplace and thereby minimize the likelihood of events that may cause injury or illness to our employees. By doing so, our safety performance can be expected to surpass the best experience of similar operations and have zero tolerance to the accidents.

ALPROEM Engineering Contractors, Corp.

- Provides procedures for identifying and evaluating hazards and unsafe conditions;
- Develops procedures for correcting hazards and unsafe conditions;
- Communicates with employees regarding health and safety matters and how to report hazards;
- Provides employee training programs;
- Develops compliance strategies;
- Maintains documentation for health and safety programs; and
- Identifies a person or persons with authority and responsibility for implementing the program.

2. Responsibilities

2.1 Program Administrator

The ultimate responsibility for providing resources towards the goal of effective policies regarding environmental health and safety issues rests in the Owners & Partners. General policies, which govern the activities and responsibilities of the Environmental Health and Safety program, are established under the authority of the Owners & Partners. As designated by the Owners & Partners, the individual with responsibility for implementing the IIPP is the Manager of Environmental Health & Safety (EH&S), hereafter referred to as the Program Administrator. The Program Administrator has the authority to implement all provisions of this program. All company employees are responsible for supporting the program and for working safely and maintaining a safe and healthful work environment.

Name: Renan A. Cruz
Title: Manager, Environmental Health and Safety
Phone: 787-225-3479
E-mail: renan.cruz@alproem.com

2.2 Environmental Health & Safety (EH&S)

- Provides consultation to all levels of **ALPROEM** management and staff regarding program compliance.
- Develops templates to assist Departments, and Projects Work Sites in implementing effective injury and illness prevention programs.
- Consults on issues of hazard identification and evaluation; procedures for correcting unsafe conditions, systems for communicating with employees, regularly scheduled safety meetings, employee training programs, compliance strategies, and recordkeeping.
- Provides centralized monitoring of projects-wide activities in the areas of environmental compliance, biological safety, chemical hygiene, emergency preparedness, fire safety, hazard communication, hazard identification, hazardous materials management, industrial hygiene, occupational safety, sanitation, and safety education and training.
- Maintains centralized environmental and employee exposure monitoring records, allowing employee access to records as directed by law.

2.3 Departments and Business Units - Managers, Administrative Assistants, Superintendents, Supervisors, Foramens and Leadsmen, are responsible for ensuring that:

- Individuals under their management have the authority to implement appropriate health and safety procedures, practices and programs.

- Areas under their management have adequate funding for health and safety programs, practices, and equipment.
- Areas under their management are in compliance with **ALPREOM's** health and safety practices, policies, and programs.
- A responsible person (see SOS Representative - Section 2.6), within each work site under their management is designated to partner with EH&S to implement the work site specific component of the IIPP.

2.3.1 Work Site - lowest level work group of individuals that:

- Includes at least one of the following:
    - -Project Manager
    - -Superintendent
    - -Supervisor
    - -Foremen/Leadsmen
- Holds periodic meetings where safety is discussed.
- Includes people who work closely and perform similar work activities on a regular basis.
- Has unique training needs to successfully implement site specific procedures.

2.4 Project Managers/Site Safety Inspectors (SSI's)

In partnership with EH&S, Project Managers/Site Safety Inspectors (SSI's) are responsible for implementing the **ALPROEM** Injury and Illness Prevention Program. Project Managers/Site Safety Inspectors (SSI's) implement the IIPP through the following actions:

- Identify a Site Safety Inspector (SSI's). This person may also be the Project Managers/Site Safety Inspectors (SSI's).
- Ensure that work unit health and safety practices are communicated and understood through training and other programs.
- Ensure that health and safety practices are consistent throughout the work site and that work site specific training is provided.
- Include compliance with health and safety procedures as part of the annual performance evaluation.
- Encourage employees to report safety concerns without fear of reprisal.
- Report injuries promptly to Workers' Compensation (Fondo or CFSE).
- Where appropriate, facilitate the implementation of:
    - Hazard Assessment and Corrections tool.

- Work site specific staff training beyond the required EH&S safety courses offered.

2.5 Employee Responsibilities

Safety on Site (SOS) has been developed by **ALPROEM** to ensure that employees implement and follow the Injury and Illness Prevention Program (IIPP). Employees are responsible for following the requirements of the IIPP through the following actions:

- Complete all EH&S required training identified by the EH&S Manager, including IIPP Safety, Electrical Safety, or NFPA 70E Annual Training.
- Know who the designated Site Safety Inspector (SSI) is for your work site.
- Participate in all work site specific training recommended and/or coordinated by your designated SSI.
- Ask your SSI, supervisor or staff when concerned about an unknown or hazardous situation or substance.
- Report all unsafe conditions, practices, or equipment to your supervisor, SSI, or to EH&S Manager.

2.6 SAFETY RULES FOR ALL EMPLOYEES

It is the policy of ALPROEM Engineering Contractors, Corp. that everything possible will be done to protect employees from accidents, injuries, and occupational illnesses while on the job. Safety is a cooperative undertaking requiring an ever-present safety consciousness on the part of every employee. If an employee is injured, positive and prompt action must be taken to see that the employee receives adequate treatment. No one likes to see a fellow employee injured by an accident. Therefore, all operations must be planned to prevent accidents. To carry out this policy, the following rules will apply:

1. All employees shall follow the safe work practices and rules contained in this manual and such other rules and practices communicated on the job.

2. All employees shall report all unsafe conditions or practices to their supervisor, and, if corrective action is not taken immediately, to the Safety Director and/or designated.

3. Supervisors shall share the responsibility for implementing the provisions of this Injury and Illness Prevention Program by insisting that employees observe and obey all rules and regulations necessary to maintain a safe, health and, to the extent possible, hazard-free work place.

4. Good housekeeping must be practiced at all times in the work area.

5. Suitable clothing and footwear must be worn at all times. Personal protective equipment (hardhat, respirators, eye protection, hearing protection, etc.) will be worn in all posted areas or whenever directed to do so by their supervisor.

6. Supervisors will conduct and employees are required to attend a documented safety meeting at the start of each new job and at least once every week thereafter.

7. No one under the influence of intoxicating liquor or drugs, including prescription drugs, which might impair motor skills and judgement, shall be allowed on the job. (Refer to Section B: Substance Abuse Policy)

8. Horseplay, scuffling, and other acts, which tend to have an adverse influence on safety or the well-being of other employees, are prohibited.

9. Work shall be well planned and supervised to prevent injuries.

10. No one shall be permitted to work while their ability or alertness is so impaired by fatigue, illness, or other causes that it might expose the employee or others to injury.

11. Employees are to verify that all machinery and equipment guards and other protective devices are properly installed and adjusted, and must report deficiencies promptly to their supervisor.

12. Employees shall not handle or tamper with any tools, equipment, or machinery, in a manner not within the scope of their duties, unless they have received specific instructions received their supervisor.

13. Employees must report all injuries and illnesses to their supervisor so that arrangements can be made for medical or first aid treatment.

2.7 Site Safety Inspectors (SSI)

Site Safety Inspectors are responsible for following the requirements of the Injury and Illness Prevention Program through the following actions:

- Complete all EH&S required training identified by the EH&S Manager, including Site Safety Inspectors Training.
- Complete the work site specific Hazard Assessment and Corrections tool and ensure that identified hazards are corrected and addressed.
- Ensure all Standard Operating Procedure (SOP) are implemented.

- Ensure work site employees take their Training and Employee Development Safety Training Self-Assessment and take all EH&S required training.
- Conduct and/or coordinate Work Site specific training for all employees in your work site every year and for new employees.
- Maintain written records for work site specific training using template.
- Conduct work site inspections. (Recommended by EH&S Manager)

2.8 RESPONSIBLE SAFETY INSPECTOR

In accordance with this Injury and Illness Prevention Program, the Safety Inspector has overall responsibility for the safety program and is the designated individual with authority to do the following in the name of ALPROEM Engineering Contractors, Corp.:

1. Develop and implement rules of safe practice for each function within the Company.

2. Develop and implement safe operating rules for the use of tools, machinery and equipment consistent with manufacturer's recommendations and specifications.

3. Conduct a thorough investigation of each accident, whether or not it results in an injury, to determine the cause of the accident and to prevent recurrence. In cases of a known serious injury or fatality accident, the investigation shall proceed only after consultation with the Board of Directors.

4. Ensure that supervisors are instructed in their safety responsibilities.

5. Develop and implement a program of employee safety education and training.

6. Conduct scheduled and unscheduled inspections to identify and correct unsafe working conditions. Special attention shall be given to identifying serious concealed dangers and taking prompt disciplinary action for intentional violation of safety rules.

7. Maintain records of training, periodic inspections, corrective actions and investigations as required by law.
   ALPROEM Engineering Contractors, Corp. will inform every person of the name of the Safety Inspector and post his/her name and telephone/office number in the location where all other safety information is routinely maintained.

2.9 DUTIES

Management fully supports the Safety Inspector and overall responsibility and authority for implementing the Injury and Illness Prevention Program is vested in

the Safety Inspector. The Safety Inspector will supplement this written program by:

- Establishing workplace objectives and safety recognition programs.
- Working with all government officials in both accident investigation and safety inspection procedures.
- Maintaining safety and individual training records.
- Encouraging the reporting of unsafe conditions and promoting a safe workplace.

Qualifications for Site Safety Inspectors:

- Associate Degree in Science of Engineering and/or documented experience in EH&S.
- Minimum of two (2) years in Supervision.
- Minimum of five (5) years of experience in Construction Industry Projects.
- Bilingual.
- 10 & 30 Hrs. of OSHA Outreach Training.
- First Aid and Cardiopulmonary Respiratory (CPR) Certification.
- Competency in administrative work activities or area of work.
- Ability to communicate safety procedures.

2.10 Visitors

Visitors are responsible for following the requirements of the Injury and Illness Prevention Program through the following actions:

- Ask a supervisor or staff member questions when concerned about an unknown or hazardous situation or substance.
- Report all unsafe conditions, practices, or equipment either to a supervisor or to EH&S.
- Keep informed about conditions that may impact your health and safety.
- Participate in EH&S training programs, as required.

3. Compliance

ALPROEM strives to ensure that all employees, management and staff comply with safe and healthy work practices. Managers, supervisors and responsible persons in the work site are responsible for establishing and maintaining sound health and safety practices. To ensure compliance, employees are:

- Recognized for following safe and healthful work practices:
    - Meeting established SOS Implementation Milestones
    - Rewarding Safe Acts - Rewards are awarded to employees who identify unsafe conditions or acts or who demonstrate exemplary safety behavior towards themselves and/or colleagues. Employees are allowed to receive these awards no more than twice in one calendar year.
- Encouraged to participate in training and retraining, as necessary or required.
- Held accountable for performing the duties of their job in a manner that demonstrates an awareness of the requirements for health and safety.
- Asked to participate in completing Hazard Assessments & corrections or surveys if indicated.
- Asked to report a safety concern in accordance with the anti-reprisal policy.

3.1 EMPLOYEE COMPLIANCE AND PARTICIPATION

Every employer is required to provide a safe and healthful workplace and ALPROEM Engineering Contractors, Corp. is committed to fulfilling this requirement. A safe and healthful workplace is one of management's highest priorities.

Integral parts of this written plan are incentives designed to promote employee participation in the safety program. These incentives are not part of regular compensation and are not intended to discourage employees from reporting accidents and injuries.

3.2 AGREEMENT TO PARTICIPATE

The information in this manual constitutes a written Injury and Illness Prevention Program. While ALPROEM Engineering Contractors, Corp. cannot anticipate every workplace hazard; the following general principals should guide employee conduct:

- Never stop being safety conscious.
- Study and adhere to the guidelines contained in this manual.
- Openly discuss job safety concerns without fear of retaliation.
- Attend all Company sponsored training and safety meetings.
- Read all posters and warnings.
- Listen to and follow instructions carefully.
- Follow the Code of safe practices contained herein.
- Participate in accident investigations as requested.
- Accept responsibility for the safety of others.
- Cooperate in maintaining all required documentation.

As a condition of continued employment, each employee is expected to fully cooperate and participate in the implementation of this Injury and Illness Prevention Program.

3.3 EMPLOYEE SAFETY SUGGESTIONS

From the time-to-time, ALPROEM Engineering Contractors, Corp. will award a prize for the best safety suggestion. To be eligible, safety suggestions should be given to the Supervisor, Safety Inspector and/or HSE Manager in writing.

Management is the sole judge of the value of safety suggestions, and will implement as many of the good suggestions as possible.

4. Communication

ALPREOM communicates with employees, management, and staff in a form readily understandable and accessible to all affected parties on matters pertaining to occupational safety and health, including provisions designed to encourage employees to inform their supervisor or EH&S of hazards at the worksite without fear of reprisal. Company employees shall not suffer any type of reprimand, discipline, or punishment as a result of reporting a safety hazard or concern. **ALPROEM** uses various systems and methods to communicate or relay information on these matters, which include:

4.1 Training Programs.

4.2 Regularly scheduled safety toll meetings (weekly).

4.3 Publications including EH&S Safety Matters, ALPROEM Emergency Procedures, and the EH&S Program Manual.

4.4 Participation in research compliance panels, and anonymous and confidential hazard reporting.

5. Hazard Identification and Evaluation

ALPROEM has procedures for identifying and evaluating work place hazards, including scheduled periodic inspections (weekly and monthly) to identify unsafe conditions and work practices. EH&S conducts periodic inspections of project sites through the Project and Offices Safety Inspections (POSI) Program, and routine warehouse safety and shops safety inspections.

Site Safety Inspectors complete Safety Task Assessments for their work sites. The following tools are used to identify hazards and unsafe conditions in the work site:

5.1 Task Hazard Assessment and Corrections Tool
5.2 Work Site Evaluations
5.3 Work Site Inspection Tools

6. Hazard Correction

Unsafe or unhealthful work conditions, practices, or procedures are corrected in a timely manner based on the severity of the hazards and available company funds. For serious hazards that are immediately dangerous to life or health, immediate action will be taken to mitigate the hazard. The Project Managers/Site Safety Inspectors, Department Managers, EH&S Manager, and all affected employees will be notified of the hazard. If the hazard cannot be immediately abated, all personnel will be removed from the affected area. Access to the area will be controlled until the safety of personnel can be assured.

6.1 HAZARD IDENTIFICATION & ABATEMENT

This Injury and Illness Prevention Program sets out a system for identifying workplace hazards and correcting them in timely fashion.

Every injury that occurs in the job, even a slight cut or strain, must be reported to a supervisor as soon as possible. Under no circumstances, except emergency trips to the hospital, should an employee leave the work site without reporting an injury.

7. Accident Reporting and Investigations

When an injury or illness occurs that is serious enough to require immediate medical treatment, notify ambulance by calling 911 on a projects emergency phones provided, Main Office phones (787) 995-0309/0310 or EH&S Department (787) 249-1350.

7.1 Reporting. The Incident/Accident Report must be completed for all employee work-related injuries and illnesses within 24 hours of the incident. For additional information please refer to the Workers' Compensation website.

7.2 Investigations. As part of completing the Incident/Accident Report, the employee and supervisor work together to determine the cause of the incident and to ensure that appropriate follow-up, hazard communication, and hazard correction has occurred. EH&S reviews Incident/Accident Report. Incident reports and EH&S investigations are documented and are filed at EH&S Department and Workers' Compensation.

Additional Resources:

- Report a Safety Concern/Near Miss
- Report a Work-related Injury or Illness
- Workers' Compensation (Fondo or CFSE).

7.3 ACCIDENT FREE WORKPLACE

It is the policy of ALPROEM Engineering Contractors, Corp. that an accident-free workplace is considered of primary importance in all phases of operation and administration. It is the intention of ALPROEM Engineering Contractors, Corp.'s management to provide safe and healthy working conditions and to establish and insist upon safe work practices at all times by all employees.

The prevention of accidents is an objective affecting all levels of our Company and must be included in the planning of all operations. It is, therefore, a basic requirement that each supervisor make the safety and health of all employees working under their direction an integral part of his or her regular management function. It is equally the duty of each employee to accept and follow established safety regulations and procedures.

7.4 ACCIDENT PREVENTION

Accident prevention is everyone's responsibility. Supervisors at all levels shall be responsible for continuous efforts directed toward the prevention of accidents. The observance of safe work practices, coupled with ongoing compliance with all established safety standards and codes, will reduce accidents and make our Company a better place to work.

Each employee has a personal responsibility to prevent accidents, a responsibility to family, to fellow workers, and to the Company. Employees are expected to observe safe work practices, abide by the rules, and follow instructions relating to the safe and efficient handling of their duties.

Employee responsibilities include the following:

- Incorporate safety into every job procedure, no job is done efficiently unless it has been done safely.
- Know and obey safe work practices and rules.
- Know that disciplinary action may result from a violation of the safety rules.
- Report all injuries immediately, no matter how slight the injury may appear.
- Caution fellow workers when they perform, or attempt to perform, unsafe acts.
- Do not take chances.
- Ask questions when there is any doubt concerning safety.
- Do not tamper with anything you do not understand.

- Immediately report all unsafe conditions and/or equipment to your supervisor.

It is the policy of ALPROEM Engineering Contractors, Corp. to provide a safe workplace and to maintain safe and sound operating practices. It is management's belief that concentrated, cooperative efforts will produce safe working conditions and result in efficient, productive operations. Safeguarding the health and welfare of our employees cannot be stressed too strongly.

7.5 INVESTIGATION / SAFETY AUDITS

One of the best methods available to establish and maintain a safe workplace is to study past accidents. By focusing on past injuries, ALPROEM Engineering Contractors, Corp. hopes to avoid similar problems in the future. Therefore, whenever there is an accident, and in many cases upon review of the past accidents, employees may be requested to participate in a safety audit interview. During the interview, there will be questions about the nature of the nature of the investigation and workplace safety related to the incident.

Meet with employee(s) to discuss the infraction & inform individual(s) of the rule or procedure that was violated and the corrective action to be taken.

Employees are expected to cooperate and answer questions honestly and completely. Also, employees should volunteer any personal observations and/or suggestions for improved workplace safety.

Based upon the study of past accidents and safety issues pertaining to our industry, a safety training program has been implemented that addresses preventative practices, the causes of accidents, and the methods that can be used to avoid the type of accidents and injury situations experienced in the past. Work rules will be reviewed, and modified as needed, based upon the study of these accidents.

In addition to studying historical information, workplace safety depends on workplace observation. Supervisors are responsible for inspecting the job site daily – before, as well as while employees are working. This does not mean that individual employees are not responsible for inspecting the workplace also. Each day, before beginning work, employees are to inspect the workplace, tools, and equipment for any dangerous conditions. The supervisor must be notified of anything significant, so that other employees and visitors to the job site can be advised.

Employees may be given written communications regarding unsafe conditions or serious concealed dangers. This communication should be carefully reviewed and appropriate adjustments in workplace behavior made to avoid any danger or hazards. If the significance of this written communication is unclear, employees should contact their supervisor and review planned actions before starting to work. It is better to wait and check, rather than to go ahead and possibly cause an injury.

Employees must be provided written notice, in the form of a posted warning, concerning any serious concealed dangers of which there is actual knowledge. In addition to providing written notice of all serious concealed dangers to employees, supervisors are also required to report serious concealed dangers to the Safety Director. The Safety Director, working with the supervisor, will ensure abatement of the hazard and/or correction of the problem. If the danger cannot be corrected, then all employees will be advised of necessary protective action so that the danger will not result in any injuries.

7.6 WORKPLACE INSPECTIONS

In addition to the examination of historical records, workplace safety inspections will be conducted periodically (at least once a week by the Safety Inspector and monthly by EH&S Manager); when potentially hazardous conditions develop or change; when a new process or procedure is implemented; and at the start of each new job.

7.7 ACCIDENT INVESTIGATION

A primary tool used by ALPROEM Engineering Contractors, Corp. to identify the cause for accidents is a thorough and properly completed accident investigation conducted by the site Safety Inspector. The results of each investigation will be presented in writing to the EH&S Manager for evaluation and implementation of the premeditative measurements.

Every job location should have on site, or have immediate access to, a camera with enough film to take pictures immediately after any accident. A written report is to be prepared from notes and diagrams made at the scene. A portable tape recorder may be used to record direct eyewitness statements as near to the actual time of observation as possible (people must be informed that they are being recorded). All statements should include the time and date given, and all pictures should be similarly identified. Also, the names, addresses, and phone numbers of all eyewitnesses must be noted or recorded.

If a formal police report or other official investigation is conducted by any government agency, the name and badge number of the official or a business card must be obtained. It is also important to find out when a copy of the official report will be available to the public. Any employee requested to make a statement has the right to have the Company lawyer or a management representative present (at no cost to the employee).

A satisfactory accident report will answer the following questions:

1. **What happened?** The investigation report should begin by describing the accident, the injury sustained, the eyewitnesses, the date, time and location of the incident and

the date and time of the report. Remember, the questions that the report must answer are who, what, when, where, and how.

2. **Why did the accident occur?** The ultimate cause of the accident may not be known for several days after all the data are analyzed. However, if an obvious possible cause suggests itself, include your conclusions at the time you give your information to the person in charge of the investigation.
3. **What should be done?** Once the cause(s) of the accident is determined, the report should suggest a method for avoiding future accidents of a similar nature.

4. **What has been done?** A follow-up report will be issued after a reasonable amount of time to determine if the suggested solution was implemented, and if so, whether the likelihood of an accident has been reduced.

8. Training and Instruction

Training is provided to each employee, including managers and supervisors, with regard to general safety procedures and to any hazards specific to an employee's job site.

All employees must complete all EH&S required training identified by the EH&S Department at **ALPROEM's** Main Office or Projects sites. The Safety Training Self-Assessment identifies training based upon work activities and work environment. Results include IIPP Safety, Electrical Safety, or NFPA 70E Annual Training. Training occurs:

- Upon the hiring of a new employee;
- When an employee is given a new job assignment for which training has not been provided; or
- When new substances, processes, procedures, or equipment that represent a new hazard are introduced.
- When recertification is due.

Training records for both EH&S training courses can be found through EH&S Department files.

8.1 SAFETY AND HEALTH TRAINING

Training is one of the most important elements of the Injury and Illness Prevention Program. Such training is designed to enable employees to learn their jobs properly, bring new ideas to the workplace, reinforce existing safety policies, and put the Injury and Illness Prevention Program into action. Every effort will be made to provide adequate training to employees. However, if an employee is ever in doubt about how to perform a job or task safely, it is his or her duty to ask their supervisor or other qualified person for assistance.

Training is required for both supervision and employees alike. The content of each training session will vary, but each session will attempt to teach and emphasize the following:

1. The success of ALPROEM Engineering Contractors, Corp.'s Injury and Illness Prevention Program depends on the actions of individual employees and a commitment by the Company.

2. Each employee's immediate supervisor will review the safe work procedures unique to that employee's job, and how these safe work procedures protect against the risk of injury or illness.

3. Each employee will be trained to determine when personal protective equipment is required or necessary, and how to use and maintain the equipment in good condition.

4. Each employee will learn what to do in the event of emergencies occurring in the workplace.

   Supervisors, vested with special duties concerning the safety of employees, are key figures in the establishment, implementation, and success of ALPROEM Engineering Contractors, Corp.'s Injury and Illness Prevention Program. Supervisors share in the responsibility or implementing the Injury and Illness Prevention Program, especially as it relates directly to the workplace. Supervisors are responsible for familiarizing themselves with safety and health hazards to which employees are exposed, how to recognize safety and health hazards, the potential effects of these hazards, and rules and procedures for maintaining a safe workplace. Supervisors are expected to convey this information to their employees in the workplace, and shall investigate accidents according to the accident investigation procedures contained in this manual.

8.2 EMPLOYEE RESPONSIBILITY FOR TRAINING

Safety is a two-way street. ALPROEM Engineering Contractors, Corp. can preach safety, but only employees can practice safety. Safety education requires employee participation. At least once every week and at the start of each new job, a meeting of all employees will be conducted for the purpose of both general and site-specific safety instruction. During these meetings supervisors and employees will discuss the application of the Company's Injury and Illness Prevention Program to actual job assignments.

The following general rules apply in all situations:

- No employee shall undertake a job that appears to be unsafe.
- No employee is expected to undertake a job until he/she has received adequate safety instructions, and is authorized to perform the task.

- No employee shall use or risk potential exposure to chemicals without fully understanding their toxic properties and without the knowledge required to work with these chemicals safely
- Mechanical safeguards must be kept in place unless their removal is specifically authorized by the supervisor.
- Employee must report unsafe conditions to their supervisor.
- Employee must immediately report any work-related injury or illness to their supervisor.
- Personal protective equipment must be used when and where required.
- Personal protective equipment must be used and maintained according to the manufacturer's guidelines.

Employees are expected to accept responsibility for their own safety, as well as the safety others in the workplace. It is each employee's responsibility to become familiar with the safe work practices and specific safety rules contained in this manual, as well as any posted government safety orders. A copy of this manual will be posted or maintained in the work area and made available at all times to employees.

8.3 PERIODIC SAFETY / TRAINING MEETINGS

Safety meetings will be conducted at the start of each new job and on a weekly basis thereafter. The purpose of the meetings is to convey safety information and answer employee questions. The format of most meetings will be to review (in language understandable to every employee) the content of the Injury and Illness Prevention Program, special work site hazards, serious concealed dangers, and Material Safety Data Sheets (MSDSs). Each week the supervisor will review a portion of the Company's safe work practices contained in this manual, or other safety-related information. Whenever a new work practice or procedure is introduced into the workplace, it will be thoroughly reviewed for safety. A sign-up sheet will be passed around at each meeting to document attendance and the topics discussed. Employee attendance is mandatory and is compensable unless the training is part of an official state approved training program or pre-employment requirement.

9. Recordkeeping

The Company has taken the following steps to document and maintain the IIPP:

- All IIPP related documents are maintained a minimum of 5 years.
- Employee exposure records are maintained for at least 30 years.

9.1. RECORDS

- ALPROEM Engineering Contractors, Corp. maintains records of employees training, hazard identification and abatement, and accident investigation. Copies of required accident investigations and documentation of employee safety training will be maintained by the HSE Manager.

- A written report will be maintained on each accident, injury or on-the-job illness requiring medical treatment. A record of each such injury or illness is recorded on the OSHA Log and Summary of Occupational Injuries Forms 300, 300A & 301 according to its instructions. Supplemental records of each injury are maintained. Every year, a summary of all OSHA-recordable injuries or illnesses attributed to each Project Site is posted no later than February through April, on OSHA Form 300A. These records will be maintained by the HSE Manager for five years from date of preparation.

10. Additional Resources

ALPROEM:

Task Hazard Assessment & Corrections Tool
Training Schedule and Registration
Report a Safety Concern/Near Miss
Report a Work-related Injury or Illness

Puerto Rico Agencies:

Puerto Rico Division of Occupational Safety and Health (PR/OSHA)
Governors Office of Emergency Services

Federal Agencies:
Environmental Protection Agency
Code of Federal Regulations
Occupational Safety and Health Administration
Centers for Disease Control and Prevention
National Institute for Occupational Health and Safety

GENERAL POLICY STATEMENT ON SAFETY

ALPROEM Engineering Contractors, Corp. strives to achieve excellence in each and every project undertaken and measures the degree of excellence achieved in accordance with performance in the following five objectives. 1. Safety, 2.Quality, 3.Reliability 4.Cost and 5.Schedule.

The Safety aspect of successful project execution is the single most important aspect, in achieving excellence in our performance, due to the profound effect safety exerts on the development of ALPROEM's human resources and the cost of doing business.

ALPROEM's Management is fully committed to implementing and supporting a sound safety program in the successful execution of each and every Company project island wide, both in principle and in practice; accordingly this Injury & Illness Prevention Program is being issued as a field procedure outlining the minimum safety requirements to be implemented in the performance of work for Client's Project, at their Job-Site.

The spirit and intent of this Injury & Illness Prevention Program is to unite each and every member of the team in an attitude of cooperation toward our mutual goal of achieving a continuous incident and injury zero tolerance performance.

Safety awareness will be established and motivated through new-hire and/or reassignment safety orientations; specialty safety training; routine safety training; weekly meetings; safety visual aids, posted in conspicuous locations; Management and Supervisory conduct demonstrating total support for safety, in practice as well as in principle; continuous statement of ALPROEM's commitment to a philosophy of zero tolerance for safety infractions; continuous surveillance, inspection and monitoring of work place safety; effective implementation of remedial procedures; effective safety communication and a program for excellence in safety performance.

Conscientious implementation of this Injury & Illness Prevention Program will result in successful achievement of our mutual goal to provide a safe and healthful work environment for all employees assigned to this project.

Each employee has an individual responsibility to prevent work-related accidents. It is to the benefit of all employees and ALPROEM's that any situation or condition believed to present a safety hazard, including any known or concealed dangers in the work area, be reported immediately. The Company encourages employees to report their concerns either to their immediate Supervisor or to the HSE Manager. The HSE Manager will take immediate action to investigate the matter.

The philosophy and objectives behind this commitment are:

Tabla de contenido

1. Propósito
2. Metas
3. Definiciones
4. Generales
5. Clasificación I
6. Responsabilidades
7. Implantación
8. Normas Generales

- The safety and health of all ALPROEM Engineering Contractors, Corp. employees are our priority.
- The only acceptable level of safety and health performance is one that prevents injury and accidents.
- Safety and health, being an integral part of production and all other business functions, cannot be compromised.
- Supervisors will be held accountable for the safety and health of personnel for whom they are responsible.
- All employees will be required to make their safety, and the safety of their fellow workers, a first priority.
- As a condition of employment, each individual within the organization will be expected to conduct their duties in a manner that is consistent with the philosophy and objectives of this policy.



JUAN R. NOA
Director of Operations

ENE | 13 | 2021

DATE