



Safety & Health Program 2022

Table of Contents

Letter from CEO and President

Core Program

I. Introduction

II. Philosophy

III. MPW Roles & Responsibilities

IV. MPW Safety & Health Program

V. Acknowledgment Agreement

VI. Sub-Programs

- 1 Audits & Inspections
- 2 Confined Spaces
- 3 Electrical
- 4 Emergency Action Plans
- 5 Employee Health
- 6 Energy Control Program
- 7 Equipment, Tools & Machinery
- 8 Fire Protection & Prevention
- 9 Hazard Communication Program
- 10 Hazard Identification & Mitigation/Control
- 11 Hazard Substances
- 12 Hearing Conservation Program
- 13 Hydro & Pneumatic (Soft) Excavation
- 14 Incident Response, Investigation & Management
- 15 Industrial Vacuuming
- 16 Managing Health & Safety
- 17 Mobile Equipment & Material Handling
- 18 Respiratory Protection Program
- 19 Training & Development
- 20 Variances
- 21 Waterjetting
- 22 Working at Heights

VII. Summary & Review

VIII. Closing

IX. Revision History

Dear MPW Associate:

We are committed to this Safety, Health and Environmental Program, demonstrated by the fact that leaders own outcomes. We are asking for your ownership of our program and procedures.

Program Vision

To be a safety, health and environmental leader.

Mission

Create and enhance enduring customer relationships through Safety, Innovation and Service.

Overall Goals

- Predict and prevent incidents – the safe work target is zero incidents and we believe zero is attainable.
- Provide a healthy work environment – encourage and support health (wellness) across the workforce.
- Minimal environmental impact – operate in a sustainable and efficient manner.

Expectations

- Leaders: Believe zero incidents are attainable and are responsible for performance and outcomes.
- Associates: Own our program and procedures, trained to work safely through MPW learning management system (LMS), classroom, seminars, hands-on performance and on-the-job training.
- Safety Committees: Executives, business leaders and site managers lead routine meetings to communicate and drive improvements.
- Resources: MPW invests to meet or exceed goals, as well as make people, work, equipment and systems effective, safe and compliant.
- Hazards: Identify, analyze and remove hazards using controls, with emphasis on innovation, technological advancement and engineered solutions wherever possible.
- Communication: This includes Safety Starters and Toolbox Talks to start every meeting, job and shift change, as well as ongoing, routine information to promote our positive, active culture.
- Observations: Exemplified by the “see something, do something” motto with bottom-up communications, we include monthly meaningful observations from all employees in our safety, health and environmental management system.
- Reporting: This includes monthly internal reporting, as well as transparency with customers, partners and regulatory bodies to share best practices, document incidents and outline trends for analysis and action.
- Incident Management: We prioritize people and safety, while conducting thorough and timely investigations that identify lessons learned that are immediately shared to drive corrective actions and improve performance.
- Safety Coin and Pin: Every employee carries their MPW Safety Coin or wears their Safety Pin as a reminder to work safely. This program applies to all MPW and Porta Kleen teams and individuals. When customer, company, or business segment practices differ, refer issues through managers to the Safety and Training Department or appropriate Corporate office(s) for resolution

We will comply with all applicable federal, state and local safety, health and environmental regulations, as well as customer mandates, to maintain standards that equal or exceed industry best practices.

We know programs, systems and performance are only as good as the people on the team. We would like to thank MPW associates – past, present and future – for their hard work and dedication. Thanks for being committed to teammates, families, customers and MPW.



Jared L. Black
President



Monte R. Black
CEO



Core Program

I. Introduction.

MPW's Safety and Health Program is focused on eliminating workplace hazards and maintaining/promoting a healthy work environment. In addition to this program, there are separate Environmental and Transportation Safety Programs to outline responsible stewardship and driver safety. However, the company will continue to use the acronym SHE – safety, health, and environmental – to align work, focus attention and priorities, and support resource allocation; to that point, employees will see references to SHE committee meetings, SHE commitment forms, and more. This approach helps us organize our work and provides a solid foundation, but each employee is responsible for execution

Our Commitment. This program is a core element of MPW's strategy and mission, and we are committed to continued improvement. Observations, safety committees, automation and training are keys to our success; we will continue to emphasize their importance. Engineering, maintenance, training, and transportation safety departments support all employees with processes, systems, research and consultation. These resources and more are part of our comprehensive program and reflect our commitment to every employee.

Your Ownership. While our goal is to be the undisputed safety, health and environmental industry leader, success rests on employee ownership of our program and procedures. Together, we can maintain standards that equal or exceed industry best practices. We know our performance is directly related to the hard work and dedication of all employees.

II. Philosophy.

The MPW President is committed to this program and is ultimately responsible for all outcomes. Senior leaders are also bound to the program and they own team outcomes. All leaders believe zero incidents are possible. Accountable leaders actively build trust, allowing managers, first-line leaders, and employees to take actions that maintain and improve our work environments. We invest in people, systems (e.g. Intalex), engineering, equipment, opportunities, time, and more, and we are dedicated to sustaining improvements. We believe our success rests on the following:

1. Trained, engaged people preventing unsafe acts and conditions, making work safe, healthy, and environmentally sustainable.
2. Standards, procedures, and best practices guiding our work at all levels.
3. Responsibility and accountability of operations leaders – they are safety professionals.
4. Working safely as a condition of employment: every work-related incident is preventable.
5. STOP WORK as an expectation for safety, health, and environmental concerns.
6. Successfully managed incidents for everyone involved, including learning from root cause analysis to corrective action implementation.

III. MPW Roles and Responsibilities.

President:

1. Own MPW's vision, program and goals, while engaging executives to drive results.
2. Set and enforce company standards.
3. Set and routinely review initiatives, metrics and goals.
4. Invest time and resources in our program.
5. Chair Executive SHE committee, and support and attend business unit safety committees.

General Managers:

1. Own business unit goals, activities and performance, while engaging managers to drive results.

2. Enforce MPW standards and set conditions for safe work, specifically:
 - a. Develop and manage procedures to meet standards and policy (e.g. energy control, variances, etc.).
 - b. Eliminate or mitigate high-risk tasks, while encouraging STOP WORK to achieve safe work.
 - c. Communicate and follow-up on relevant safety committee meeting results at all levels.
 - d. Achieve safety goals including safety observation and training compliance percentages.
 - e. Support health programs and lead by example to encourage wellness.
 - f. Lead environmental initiatives that enhance sustainability, monitoring reuse and reduction.
 - g. Ensure routine audits of operations, verifying corrective actions and best practices.
 - h. Demand and lead through incidents and investigations, guiding corrective actions and learning.
 - i. Manage databases (e.g. ISNetWorld), minimize workers compensation and reduce auto claims.
3. Chair business unit SHE committee and be an active member of the Executive Safety Committee.

Director of the Safety and Training Department:

1. Advise and aid MPW and business unit leaders in executing policy and program requirements.
2. Support MPW and business units with safety, transportation safety, training and development policies and programs.
3. Manage support systems (e.g. Safety Management System) and related reporting/compliance systems.
4. Support customer and contractor management database (e.g. ISNetWorld) compliance activities.
5. Assist in research of new standards or work tasks that require additional resources.
6. Ensure the maintenance of accurate files and records to support compliance.
7. Review, act on and report data and conduct analysis to drive programs and results.
8. Communicate with federal, state and local agencies.
9. Active member of the Executive Safety, Health, and Environmental Committee.

Director of the Engineering and Maintenance Departments:

1. Advise and aid MPW and business unit leaders in executing program requirements.
2. Ensure equipment, including what we build, is safe and being made safer.
3. Audit and continuously improve preventive and unscheduled maintenance programs to ensure safe vehicles and equipment.
4. Support MPW and business units by providing comprehensive technical guidance and training.
5. Develop approaches, procedures, and/or equipment to mitigate or eliminate hazards.
6. Manage and provide company vehicle and equipment data to support maintenance systems.
7. Active member of the Executive Safety, Health, and Environmental Committee.

General Counsel:

1. Lead litigation efforts and support communication with federal, state and local agencies.
2. Manage insurance programs.
3. Manage claims by working with outside parties and insurance adjusters.
4. Support incident investigations, from a regulatory and compliance perspective.
5. Active member of the Executive Safety, Health and Environmental Committee.

Managers and First Line Leaders:

1. Own team SHE goals, activities and performance, while engaging employees to drive results.
2. Execute and enforce MPW standards and set conditions for safe work, specifically:
 - a. Execute procedures to meet standards and policy (e.g. energy control).
 - b. Identify and manage risk, mitigating or removing hazards and encouraging STOP WORK to achieve safe work.
 - c. Provide input for and follow-up on safety committee meeting activities and initiatives.
 - d. Conduct and record audits, verifying standards and/or implementing corrective actions and best practices.
 - e. Report and thoroughly investigate (or ensure investigation of) and manage relevant shortfalls.
 - f. Manage incidents, start to finish, prioritizing care for employees while taking appropriate actions to adjust standards and share best practices.

- g. Maintain safety observation and training compliance >90%.
 - h. Ensure PPE, equipment and vehicles are properly inspected, maintained and used.
 - i. Ensure authorized, competent employees operate equipment and drive vehicles.
 - j. Execute environmental initiatives that enhance sustainability, reporting reuse and reduction.
 - k. Support and communicate health programs and lead by example to encourage wellness.
 - l. Create and support safe, healthful and sustainable workplaces.
 - m. Comply with applicable federal, state and local regulations, as well as customer mandates.
3. Chair and/or support local SHE committees and actively support business unit SHE Committee.

Safety, Health and Environmental (SHE) Professionals:

- 1. Know, follow and enforce MPW and customer specific programs, policies and procedures.
- 2. Advise and aid leaders in executing program requirements.
- 3. Support business units and local teams with documented training that meets standards.
- 4. Be the local expert on safety management systems (e.g. Intalex) and related reporting.
- 5. Assist in research of new standards or work tasks that require additional resources.
- 6. Active member and/or supportive of local safety, health, and environmental committees.
- 7. Advise and assist leaders and employees during and after incidents.
- 8. Sub-program coordinators are subject matter experts focused on program execution and training.

All Employees:

- 1. Own this program – safe work, safe results.
- 2. Know and follow MPW program, policy and procedure requirements.
- 3. Properly inspect and use all equipment and vehicles.
- 4. Report incidents, near misses, unsafe acts and unsafe conditions immediately.
- 5. Submit a meaningful safety observation with action monthly.
- 6. Meet and stay current on all training requirements.
- 7. When the situation demands, exercise STOP WORK authority and/or seek training.
- 8. Participate in and/or support committees and investigations.

IV. MPW Safety and Health Program.

The following are the core elements of our program and safety performance management system.

Safety.

The safe work Target is Zero and our target is attainable. Hazard elimination or reduction is the key to predicting and preventing incidents along with continuously improving processes; relying first on engineered controls to remove hazards; investing in the safest technologies; mandating the use of safety equipment and PPE; enforcing policies and procedures; reluctant variance approval; and positive recognition. This includes the security of our people and work sites.

Health.

Preventing exposure to hazards that can have short and/or long-term health effects is essential. Our staff physician works with our employees, leaders and customers to minimize hazards and exposure, as well as provide advice and assistance. Wellness opportunities and programs are offered and leaders encourage employee participation. Resources and employer sponsored competitions are available.

Topic	Measure
Total Recordable Incident Rate (TRIR)	< 1
Safety Committees	Routinely conducted with documented results
Experience Modification Rate (EMR)	< 1
Routine Inspections & Audits (IA)	Monthly IA reports by site
Citations, Orders and/or Violations	Zero
Corrective Actions	Documented corrective actions tracked & implemented
Observation Compliance	> 90%
Training Compliance	> 90%
Claim Spend vs Total Hours Worked	≤ Industry Targets
Employee Health Programs	Participation & Results Meet Annual Targets

Measuring Safety and Health Performance. Using our program, we measure performance to drive action: Policies, Procedures and Variances:

Policies and procedures comply with applicable federal, state, and local regulations to include Canadian law as well as customer mandates to maintain standards that equal or exceed industry best practices. They have been developed to consider not only systems and processes, but also people and culture.

- *Policies* guide actions and inform employees. They are part of our culture and systems, often disseminated through training and experience. They are available electronically on our SharePoint site, as well as via hard copy when requested. Computer kiosks are provided at many locations for employees to access policies and other company information. Employees are expected to follow, as well as help improve, policies and procedures.
- *Procedures* are written and posted on SharePoint and/or other internal file sharing platforms, then communicated by business leaders through instructor-led, virtual and on-the-job training. However, they are primarily developed by business unit subject matter experts to address site and task specific requirements.
- *Variances* are alternate procedures which ensure an equivalent level of safety. A variance may be requested when conditions require deviation from company policy. Variances are serious and should be few. If an employee faces a situation that puts safe work in conflict with policies or customer mandates, we work together to communicate, find solutions and/or seek variances, ensuring laws and regulations are obeyed. Adhering to written business unit procedures, all variances are documented, approved and communicated before work starts.

Recognition:

- Safety Observation of the Month: Awarded to the employee(s) whose observation has been selected as the most meaningful for the month, by business unit.
- Training Compliance (90% Club): Awarded monthly to the teams who meet or exceed 90% training compliance.
- Roadside Inspection Award: Presented to CDL drivers who pass roadside inspections with zero violations.
- Driver Excellence Award: Presented to CDL drivers who achieve either 10 years or 1,000,000 miles where safe driving is their primary duty without incident, citation, or violation.
- External Awards: We have received numerous safety awards, and we will continue to compete for external recognition to prove our commitment.

Commitment:

We will endure as the best industrial services provider only if we maintain, improve and sustain our program and our positive safety, health and environmental culture. To encourage ownership, we ask all employees to commit to the program by signing the acknowledgment agreement.



Acknowledgment Agreement

V. Acknowledgment Agreement.

Commitment to Safety, Health and Environmental Excellence

I certify I reviewed the program and I am aware of my roles and responsibilities.
I agree to be safe at my work (and at home), healthy in my choices and environmentally responsible.

Please review and write initials next to each statement

I must learn and follow SHE policies and procedures as a condition of employment. When at a customer site I will also comply with their safety, health and environmental programs – with more stringent procedures taking precedent.

I will comply with all applicable federal, state and local safety, health and environmental regulations and maintain occupational health and safety standards that equal or exceed industry best practices.

I understand it is my responsibility to ensure my full understanding of all potential work hazards and exercise my “STOP WORK” authority for any task that violates our SHE program.

I understand it is my responsibility to be current with assigned training and to seek additional training when my skills and/or confidence leave me with doubt in my ability to safely perform work.

I understand personal protective equipment (PPE) such as hard hats, safety glasses, hearing protection and gloves are required and I accept responsibility for proper inspection, use and care of all PPE.

I understand some work activities are physically strenuous and that I am responsible for communicating to MPW leadership any instance where I believe I am not fit for duty or able to work safely.

I must immediately report any near miss or work incident to my supervisor/manager.

I have the right to request and receive appropriate medical treatment and I will inform my supervisor/ manager of my desire to seek medical treatment before treatment is administered.

I understand it is my responsibility to actively contribute to SHE excellence and I will exhibit that commitment by carrying my Safety Coin or wearing my Safety Pin while at work.

I will submit at least one meaningful safety observation with action taken monthly.

**My signature and dates below signify my understanding of these responsibilities
and my commitment to MPW and customer safety, health and environmental standards.**

Name:

Date:



Sub-Programs

VI. Sub-Programs.

These sub-programs are individual programs within our larger program. A single sub-program may be addressed by one or several policies and/or procedures, but this summation of our sub-programs is intended to provide the information needed to holistically understand our commitment and program.

Customer programs and policies will be followed. We ensure customer training and other requirements are met prior to starting work. If the MPW safety program, sub-programs, policies and/or procedures come into conflict with customer requirements, we consult with customers to resolve issues. We will also address safety concerns on customer sites, regardless of who is involved, because we are part of the customer's team. All material is reviewed annually and when standards or best practices change.

Sub-Programs	
1 Audits & Inspections	12 Hearing Conservation Program
2 Confined Space Entry	13 Hydro- & Pneumatic- (Soft) Excavation
3 Electrical	14 Incident Response, Investigation & Management
4 Emergency Action Plan	15 Industrial Vacuuming
5 Employee Health	16 Managing Health & Safety
6 Energy Control (Lockout Tagout)	17 Mobile Equipment & Material Handling
7 Equipment, Tools & Machinery	18 Respiratory Protection Program
8 Fire Protection & Prevention	19 Training & Development
9 Hazard Communication	20 Variances
10 Hazard Identification & Mitigation/Control	21 Waterjetting
11 Hazardous Substances	22 Working at Heights

Executive Summary: The audits and inspections sub-program ensures employees work in the safest environment possible. It also ensures teams adhere to law, regulation, policy, and procedure, as well as customer mandates. Audits are a check on systems to ensure processes are followed, while inspections are actual checks on work. Audits and inspections are critical in identifying potential hazards otherwise overlooked, and for learning. We use them to identify and eliminate unsafe working conditions, health hazards, and environmental shortfalls.

Health and safety professionals will audit and/or complete an inspection each time they are in the field. Leaders commit to routinely auditing and inspecting alongside employees, as well as inviting interdepartmental and interdivisional visits to identify any activity, piece of equipment, or materials that raise a concern. Feedback and data gathered is shared and analyzed at Safety Committees to gauge performance. It is also part of our daily operations routine: walking down a job to create a Job Safety Analysis (JSA) or Job Specific Safety Plan (JSSP) that acts as a work site inspection, addressing hazards, non-compliance, and communication. This section also applies to external/customer audits and inspections, which are encouraged.

Administrator(s): President, MPW; General Managers; and Director of Safety & Training

Administrator Duties: Administrator ensures sites and facilities are audited/inspected in accordance with policy, customer, and agency direction, with records of audits maintained and action items resolved. Coordinate with Director of Safety & Training to improve programs and policies.

Reporting: Sites and business units submit monthly reports to Safety Committees identifying the number of audits/inspections conducted, the focus area (if not general), and key results.

Documentation: Completed audit and inspection forms are digitized and maintained locally, to include external and/or customer audits and inspections of MPW work.

Training: All managers and supervisors are trained on the standard for and proper conduct of audits and inspections or present proof of external or prior training within 30 days of assignment to their position.

Resource Allocation: Resources invested include the development of materials and the MPW Safety Management System. Also, time to develop and communicate policy, forms, reports, reviews, and corrective actions. Finally, there is time to perform and follow up on audits and inspections.

Guiding Documents: MPW Policy PO-HS-154: Safety Audits & Inspections contains our guidelines, while PO-HS 101: Hazard Identification & Risk Assessment addresses JSAs, PO-HS-149: Safety Committees, PO-HS-144: Incident Response, Investigation, & Management, and PO-HS-159: Environmental reference additional guidelines. OSHA standards 29 CFR 1910.146 (permit-required confined space) and 29 CFR 1910.147(c) (control of hazardous energy), among others, including the Canadian Labour Program OHS (SOR/86/304), provide the basis for these policies and sub-program.

Executive Summary: The confined space entry sub-program provides guidance to ensure employees are prepared to work safely in confined spaces. It also ensures teams adhere to law, regulation, policy, and procedure, as well as customer mandates. Confined spaces are well-defined by OSHA and we adhere to that definition; all confined spaces are treated as permit required by MPW. Entry is a last resort for work and rescue – we prefer engineered solutions that remove employees from the hazards.

The roles of employees involved in confined space work, as well as our parameters and requirements, are outlined. Our sub-program addresses atmospheric and other hazards requiring mitigation or removal before work begins. Leaders are committed to thoroughly resourcing confined space and rescue work. When entry is required a qualified supervisor is assigned to oversee entry operations and establish a rescue plan. Authorized entrants and attendants are provided the necessary air monitoring, retrieval, and personal protective equipment.

Administrator(s): General Managers and Director of Safety & Training

Administrator Duties: Administrator ensures the requirements of the confined space entry sub-program and OSHA standards are met at each worksite and facility. Coordinate with the Director of Safety & Training to improve programs and policies.

Reporting: All confined space entry and confined space rescue work is reported to the manager responsible for the site. Confined space incidents must be reported immediately in our Safety Management System – Intelix – for investigation.

Documentation: Confined space permits are completed and maintained on site for one year. The attendant maintains an entry permit, and all air monitor readings and attendant entries are logged. All confined space work is documented on proper MPW and customer forms, as required, and those are part of the job paperwork.

Training: Training is required prior to entry and rescue work. Initial is instructor-led, based on OSHA requirements. Site-specific and advanced training are offered, to include a week-long, in-house rescue training and first aid/CPR/AED training. There are annual refreshers. Training records are completed and maintained on paper, digitally, and/or in the MPW Learning Management System (LMS).

Resource Allocation: Resources invested include the development of training materials, MPW eCourse, and hands-on training – including simulators used for entry and rescue training. Also, there is the time to develop and communicate policy, procedures, reports, and reviews. Finally, quality gas detection equipment and other entry and rescue equipment is provided as necessary.

Guiding Documents: MPW Policies PO-HS-108: Confined Space Entry and PO-HS-165: Confined Space Rescue contain our guidelines. Additional policies reference confined space work, as appropriate. OSHA standard 29 CFR § 1910.146 and Canadian SOR/86/304 Part XI provide the basis for this policy and sub-program.

Executive Summary: The electrical sub-program ensures employees are aware of the hazards and specifically protected from the hazards of electricity. It also ensures teams adhere to law, regulation, policy, and procedure, as well as customer mandates. This sub-program sets parameters and expectations for equipment, wiring, and functions of employees who are exposed to energized circuits and equipment. There is a clear line set prohibiting any non-qualified person from working on energized electric circuits or equipment. We also reference our energy control sub-program to ensure all equipment is de-energized when work is required. Working on energized equipment at any time and for any reason requires an approved variance.

Proper PPE is mandated, referencing and incorporating NFPA 70E Arc Flash concerns. The sub-program also addresses electrical safety in working environments, including elevated work areas that may be near wires (lifts, ladders, scaffolds, etc.) and GFCIs. Electrical safety and awareness training is required for all employees exposed to electrical hazards. Several policies reference electrical safety and work, including grounding during vac and waterjetting operations, to ensure comprehensive safety in a variety of work environments.

Administrator(s): Director of Engineering & Maintenance, General Managers, and Director of Safety & Training

Administrator Duties: Administrator ensures the requirements of the electrical sub-program and OSHA standards are met at each worksite and facility. Coordinate with the Director of Safety & Training to improve programs and policies.

Reporting: Electrical safety violations must be reported immediately and submitted as an incident in our Safety Management System – Intellex – for investigation. All proposed live electrical work is approved by General Managers or the Director of Engineering & Maintenance.

Documentation: Managers maintain lists of qualified and competent people to do work at their sites. All work involving electrical hazards requires a Job Safety Analysis or similar risk assessment/mitigation document is required.

Training: Training is required prior to electrical work. Initial is instructor-led, based on OSHA requirements. Qualified personnel must receive training that meets regulatory requirements and MPW policy. Site-specific and continued training is required, to include initial and refresher eCourse training. Training records are completed and maintained on paper, digitally, and/or in the MPW Learning Management System (LMS).

Resource Allocation: Resources invested include the development of training materials, MPW eCourses, and hands-on training. Also, there is the time to develop and communicate policy, procedures, reports, and reviews. Finally, special equipment and PPE are provided.

Guiding Documents: MPW Policy PO-HS-110: Electrical contains our guidelines. Additional policies reference electrical work and safety, as appropriate. NFPA 70E, OSHA standards 29 CFR § 1910.137, 29 CFR § 1910.331-335, and Canadian SOR/86-304 Part VIII provide the basis for this policy and sub-program.

Executive Summary: The emergency action plan (EAP) sub-program ensures employees are aware of the hazards of man-made and naturally occurring emergencies and specifically protected from those hazards. It also ensures teams adhere to law, regulation, policy, and procedure, as well as customer mandates. Every MPW site that requires an EAP has one in place and employees at customer sites are instructed to become familiar with local EAPs. Our EAP's are tailored to describe actions in case of an emergency, address workplace emergencies based on hazard assessments (ex: fire), and geography (earthquakes, tornadoes, and/or hurricanes). They may be integrated with customer/other plans.

They include direction for employees and leaders to understand and follow applicable EAPs, as well as understand assigned roles and conduct rehearsals. Should an emergency occur, goals are to ensure employees and visitors are protected and/or removed from the hazard(s). We are prepared to respond and quickly notify first responders, as needed. Leaders understand their responsibility to ensure employees and visitors are ready, caring for people first.

Administrator(s): President, MPW; General Managers; Chief of Security; and Director of Safety & Training; Facility Managers are assigned for each location.

Administrator Duties: Administrator ensures the requirements of the Emergency Action Plan (EAP) sub-program and OSHA standards are met at each worksite and facility, including required sites having an updated, appropriate plan and that teams are compliant with customer plans. Coordinate with Director of Safety & Training to improve programs and policies.

Reporting: Updates to plans will be reported to the Chief of Security and responsible operational leaders. Reports of hazards or threats are made to co-workers, Chief of Security, leaders, and, when needed, 9-1-1. All incidents are reported in and investigated using our Safety Management System – Intellex – to determine root cause. Data is analyzed to identify trends and improve response: prevention is the goal, when possible.

Documentation: The EAP includes an emergency contact list, crisis response team contact list, floor leader contact list, emergency procedures, and facility maps. The EAP is maintained on SharePoint and updates are recorded.

Training: All employees are directed to review the EAP that governs their work area at least annually, with the corporate EAP assigned as an eCourse for campus employees. New hire training at all locations includes site-specific EAP reviews and directions, to include mandating customer site EAPs. Site managers are responsible ensuring customer specific EAP's are reviewed.

Resource Allocation: Resources invested include the development of training materials, MPW eCourse, and the policy/plan itself. Also, there is time allocated to rehearse EAP procedures. Finally, facility improvements and structures are maintained and prepared.

Guiding Documents: MPW Policy PO-HS-168: Emergency Action Plan contains our guidelines for creating site-specific EAPs. OSHA standards 29 CFR § 1910.33-39 and Canadian SOR/86-304 Part XVII provide the basis for this policy and sub-program.

Executive Summary: The energy control (also known as lock out-tag out) sub-program ensures employees are aware of energy hazards, understand how to properly ensure equipment is de-energized, know the steps to participate in an energy control process or procedure, and safely work in environments that require energy control. It also ensures teams adhere to law, regulation, policy, and procedure, as well as customer mandates. Employees working in an energy control environment are trained on energy control, including on-the-job procedure reviews.

In addition to lock out/tag out, MPW encourages try out, allowing each authorized employee the opportunity to verify that all energy sources are de-energized prior to commencing work. The sub-program addresses affected and authorized personnel, energy isolating devices and lock-out devices and their use, individual and group energy control activities, and clear procedures to ensure safety. Several policies reference energy control safety and work, including confined space and electrical, to ensure comprehensive safety in a variety of work environments.

Administrator(s): General Managers; Director of Engineering & Maintenance; and Director of Safety & Training

Administrator Duties: Administrator ensures the requirements of the energy control sub-program and OSHA standards are met at each worksite and facility. This includes verifying that each required piece of equipment has an appropriate procedure or that we follow customer procedures that are as safe as the ones we require. Coordinate with the Director of Safety & Training to improve programs and policies.

Reporting: Energy control violations must be reported immediately and submitted as an incident in our Safety Management System – Intellex – for investigation.

Documentation: MPW-owned equipment that is required to have procedures will have documented procedures for the proper isolation of energy. We provide verification forms, completed by authorized employees as verification of procedure completion, and documentation is encouraged. Approval to forcibly remove a lock must be documented. Where needed, we include and follow documentation procedures and operations dictated by customers.

Training: Training is required prior to performance of energy control activities. Initial training is instructor-led, based on OSHA requirements. Site-specific and advanced training are required, to include equipment specific energy control procedures and refresher eCourse training. Training records are completed and maintained on paper, digitally, and/or in the MPW Learning Management System (LMS).

Resource Allocation: Resources invested include the development of procedures, training materials, MPW eCourses, and hands-on training. Also, there is the time to develop and communicate policy, procedures, reports, and reviews. Finally, equipment (lockout devices, energy control devices) is provided.

Guiding Documents: MPW Policies PO-HS-124: Energy Control Program, PO-HS-110: Electrical and PO-HS-101: Hazard Identification & Risk Assessment, among others, contain our guidelines. OSHA standard 29 CFR § 1910.147 and Canadian SOR/86-304 Part VIII provide the basis for this policy and sub-program.

- Executive Summary:** The employee health sub-program ensures employees are aware of the hazards of work based on their physical movements and exposures within the workplace. The employee health sub-program includes the design of the work area, housekeeping, and training for employees on how to work safely, including how to properly store/handle materials and how to avoid repetitive motion injuries, strains, and other issues related to work. The employee health sub-program also covers bloodborne pathogen exposures. Employees must be trained on what bloodborne pathogens are, and if necessary, how to respond. Mental health and fitness for duty are important elements of this sub-program including identifying personal and teammate fatigue. This sub-program also ensures preparedness for epidemics and/or pandemics including decontamination necessary to ensure a healthy workplace. The key is to use hazard assessments and safety observations to ensure risk activities are identified and mitigated. Innovative technological improvements are prioritized as engineering solutions to minimize hazards. Administrative controls, which may include rest or task changes, and task coaching are, emphasized to ensure employees are using proper techniques. This sub-program also ensures teams adhere to law, regulation, policy, and procedure, as well as customer mandates.
- Administrator(s):** General Managers; Company Doctor; and Director of Safety & Training
- Administrator Duties:** Administrator ensures the requirements of the sub-program and OSHA standards are met at each worksite and facility. Coordinate with the Director of Safety & Training to improve programs and policies.
- Reporting:** Related incidents and injuries must be reported immediately and submitted as an incident in our Safety Management System – Intelix – for investigation.
- Documentation:** We document hazards on Job Safety Analysis forms and emphasize 5S standards in housekeeping to mitigate or remove hazards.
- Training:** Initial general and foundational safety training is instructor-led, based on OSHA recommendations. Specific task analysis is part of on-site performance evaluations and Job Safety Analysis training. Training records are completed and maintained on paper, digitally, and/or in the MPW Learning Management System (LMS).
- Resource Allocation:** Various resources are available including HR tools and systems, training, and subject matter experts. There is time allocated to the proper analysis of jobs, as well as investments in automated tools and engineered solutions to remove people from hazards. Resources invested include the development of training materials, MPW eCourses, and the policy/plan itself. Finally, performance is evaluated, and improvements prioritized.
- Guiding Documents:** MPW Policies PO-HS-107 Bloodborne Pathogen Exposure Control Program, PO-HS-114 First Aid, Safety Shower, and Eye Wash Equipment, PO-HS-157 Heat & Cold Related Illness Prevention, PO-HS-167 Ergonomics, PO-HS-177 Fitness for Duty, PO-HS182 Medical Surveillance, PO-HS-190 Decontamination, and PO-HS-191 Epidemic and Pandemic Response, PO-HS-164: General Safety & Housekeeping, PO-HS-101: Hazard Identification & Risk Assessment, PO-HS-154: Safety Audits & Inspections, PO-HS-167: Ergonomics and more contain our guidelines. OSHA standard 29 CFR § 1910.900 was archived in 2001, but it, in addition to Canadian SOR/86-304 Section 19.6, provide the basis for these policies and sub-program.

- Executive Summary:** The basis of the equipment, tools, and machinery subprogram is to provide basic guidelines for the operation, inspection, and maintenance of company owned and leased equipment, machinery, including hand tools and power tools used in company shops and on jobsites in accordance with OSHA, MSHA, and OH&S requirements. All equipment, tools, and machinery must be thoroughly inspected prior to each use to ensure proper operating condition. If the inspection identifies any deficiency STOP WORK authority must be enacted until the deficiency is corrected. If it will be a prolonged repair, equipment shall be conspicuously marked “Out of Service” or in a manner that prevents use. Manufacturers’ instructions regarding the use of equipment, tools, and machinery must be followed. Manufacturers’ instructions or manuals must be utilized for additional information on set up, installation, guard placement/adjustment, maintenance, and use prior to using or installing a new piece of equipment. Where it is necessary to remove a machine guard from a tool to perform repair, part replacement, or maintenance work on the machine, power tools must be de-energized and rendered inoperative. Modifications are prohibited. Practical and hands-on training, in many cases while on the job, will be provided by a competent person as necessary for the safe and proper inspection, maintenance, and use of all tools and machinery.
- Administrator(s):** Director of Engineering and Director of Safety & Training
- Administrator Duties:** Administrator ensures the requirements of the equipment, tools, and machinery sub-program and OSHA, MSHA, and OH&S standards are met at each worksite and facility. Coordinate with the Director of Safety & Training to improve programs and policies.
- Reporting:** All incidents involving equipment, tools, and machinery must be reported immediately and submitted as an incident in our Safety Management System – Intelex – for investigation, in addition anytime an equipment modification is discovered an incident report shall also be submitted.
- Documentation:** All equipment, tool, and/or machinery inspections must be documented and retained on file per local procedure and in accordance with regulatory guidance. In addition, items must have an up to date operator’s manual or suitable replacement. Where needed energy control procedures must be written and available.
- Training:** Training is required prior to work that requires a knowledge of equipment, tools, and machinery. Hands-on training is required for employees, delivered by a competent and/or qualified person. Site-specific and refresher training are required per customer and/or company standard. Training records are completed and maintained on paper, digitally, and/or in the MPW Learning Management System (LMS).
- Resource Allocation:** There is time allocated to the proper inspection and preparation of work areas, equipment, tools, and machinery as well as the purchase of approved and required items. Resources invested include the development of training materials, MPW eCourses, and the policy/plan itself. Finally, facility improvements and structures are maintained and prepared.
- Guiding Documents:** MPW Policy PO-HS-115: Equipment, Tools, & Machinery, PO-HS-104 Abrasive Blasting, and PO-HS-178: Preventative Maintenance contain our guide lines. Multiple OSHA standards and Canadian SOR standards provide the basis for these policies and sub-program.

- Executive Summary:** The fire protection and prevention sub-program ensures employees are aware of all fire hazards in their work environments. In addition, employees shall be aware of how to control associated hazards before, during, and after work, including specific hot work controls. This includes being familiar with methods for preventing fires and for extinguishing incipient fires as required. It also ensures teams adhere to law, regulation, policy, and procedure, as well as customer mandates. All potential fire hazards which must be mitigated – protecting employee health and property.
- Hot work, which may be performed by MPW employees, customers, or other contractors at MPW and/or customer facilities, typically consists of welding, cutting, grinding, and other flame or spark-producing operations. We mandate hot work permits and knowledge of customer hot work activities near our work, and fire watch. There is emphasis placed on hot work near or in areas that allow access to other work environments, often signaled by grating, openings, permeable fences, or dividers/barricades that do not completely contain the side effects of hot work. Attention is paid to combustibles in the work areas and proper ventilation of the site. Signage and proper barriers must be erected prior to hot work, and we mandate a site inspection and hazard assessment prior to all hot work. After hot work we mandate a minimum 30-minute fire watch.
- Administrator(s):** Director of Engineering and Director of Safety & Training
- Administrator Duties:** Administrator ensures the requirements of the fire safety & prevention sub-program and OSHA standards are met at each worksite and facility. Coordinate with the Director of Safety & Training to improve programs and policies.
- Reporting:** All fires and hot work violations (Ex: extraneous fires caused by hot work) must be reported immediately and submitted as an incident in our Safety Management System – Intelex – for investigation. Planned hot work must be reported to all affected employees in the work environment prior to start.
- Documentation:** Facilities should have a documented fire safety plan as part of their EAP. Hot work permits are mandated and available for all hot work conducted outside of designated hot work areas, to include fire watch.
- Training:** Training is required prior to work that requires a knowledge of hot work procedures. Hands-on training is required for employees required to use fire extinguishing equipment. Initial is instructor-led, based on OSHA requirements. Site-specific and continued training are required, to include initial and refresher eCourse training. Training records are completed and maintained on paper, digitally, and/or in the MPW Learning Management System (LMS).
- Resource Allocation:** There is time allocated to the proper inspection and preparation of work areas, as well as the purchase of approved and required equipment. Resources invested include the development of training materials, MPW eCourses, and the policy/plan itself. Finally, facility improvements and structures are maintained and prepared.
- Guiding Documents:** MPW Policy PO-HS-113: Fire Protection & Prevention and PO-HS-121: Hot Work contain our guidelines. Multiple OSHA standards, like 29 CFR 1917.152, 1910.252, 29 CFR 1910.106, and Canadian SOR/86-304 Sections 17.3-17.4 provide the basis for this policy and sub-program.

Executive Summary: The hazard communication sub-program ensures employees are aware of information needed to protect themselves and others. It also ensures teams adhere to law, regulation, policy, and procedure, as well as customer mandates. Chemicals and hazardous materials at work (and home) pose both physical and health hazards. The focus is on any work or operations where employees may be exposed to hazardous or potentially hazardous chemicals or during any foreseeable emergency. Step one in staying safe around these hazards is understanding, which is the basis of our Hazard Communication sub-program.

We follow the Globally Harmonized System for labeling and communication and require site-specific hazard communication plans. We also adhere to and learn from the plans of our customers. Safety Data Sheets (SDS), labels, pictograms and safe work procedures are emphasized and trained as the way to ensure awareness and knowledge as a baseline for action. Facility managers must maintain a chemical inventory and appropriate SDSs, ensuring information is available to guide work and the use of protective equipment.

Administrator(s): General Managers; Director of Engineering; Director of Transportation Safety, and Director of Safety & Training

Administrator Duties: Administrator ensures the requirements of the hazard communication sub-program and OSHA standards are met at each worksite and facility. Coordinate with Director, Safety & Training to improve programs and policies.

Reporting: Chemical spills and exposures must be reported immediately in our Safety Management System – Intelix – for investigation. The administrators must maintain an inventory of the chemicals and hazardous materials at their site and report them annually to the Safety & Training Department.

Documentation: Semi-annual chemical and hazardous materials reports are required internally, as are appropriate and current SDSs and labels for all materials.

Training: Training must meet OSHA standards and be completed before employees are exposed to hazardous materials. Training records are completed and maintained either on paper, digitally, and/or in the MPW Learning Management System (LMS).

Resource Allocation: Resources invested include the development of training materials, MPW eCourses, and site-specific training. Also, there is the time to develop and communicate policy, reports, reviews, and corrective actions. Finally, there are materials needed for handling and safety.

Guiding Documents: MPW policy PO-HS-116: Hazard Communication Program contains our guidelines. PO-HS-181: Hazardous Substances provides categorical and chemical specific information for many substances in which employees have potential exposure. Additional policies reference hazard communication, as appropriate. United Nations Globally Harmonized System, OSHA standard 29 CFR § 1910.1200, Canadian SOR/86-304 Part X, and WHMIS provide the basis for this policy and sub-program.

Hazard Identification & Mitigation/Control

- Executive Summary:** The hazard identification and mitigation sub-program ensures employees recognize hazards and assess risks prior to performing work. MPW uses a Safety Management System that allows employees to submit both safety concerns and suggestions for improvement. While the system can be a useful tool for tracking and reporting, employees are encouraged to communicate directly with management for a timely response. Leaders are held accountable to resolve concerns.
- Employees are trained to understand potential hazards of their work environment. Safety observations and job safety analyses are mandated to make hazard identification and risk assessment routine and expected. This sub-program ensures employees understand the proper function and importance of the hierarchy of controls for hazards following hazard ID and risk assessment. We aggressively pursue engineering solutions to remove hazards, implement administrative controls to separate people from hazards, and use PPE as a last resort. Engineering controls often include the use of automation or installation of guards, barricades, or other override controls. This subprogram is intended to ensure employees follow the hierarchy of controls to eliminate or substitute hazards prior to relying on personal protective equipment. This sub-program governs the use of energy control procedures, guards, barriers/barricades, signage, x-brace for confined spaces, and other controls required for safe work. Best practices are communicated company wide. Employees who recognize an uncontrolled hazard are directed to use their STOP WORK authority. We also have a Hazard Identification & Risk Assessment policy to guide this work. This sub-program also ensures teams adhere to law, regulation, policy, and procedure, as well as customer mandates.
- Administrator(s):** President, MPW; General Managers; and Director of Safety & Training
- Administrator Duties:** Administrator ensures the requirements of the hazard identification and mitigation sub-program and standards are met at each worksite and facility. Coordinate with Director, Safety & Training to improve programs and policies.
- Reporting:** Hazards must be reported to managers/supervisors, and any violation must be reported immediately and submitted as an incident in our Safety Management System – Intelix – for investigation. Customer site hazards are reported to customers and other contractors.
- Documentation:** The primary active documentation step is completion of a Job Safety Analysis or Job Specific Safety Plan, where all hazards associated with work must be listed. Deficiencies are documented in our Safety Management System – Intelix. Customer site hazards are also documented and communicated.
- Training:** Training is required prior to work that requires emphasis on hazard identification and risk assessment. Supervisors are required to complete the Hazard Identification course on the LMS to demonstrate knowledge of the applicable standards and are also encouraged to complete OSHA 30. Site-specific and continued training are required, to include initial and refresher eCourse training. Training records are completed and maintained on paper, digitally, and/or in the MPW Learning Management System (LMS).
- Resource Allocation:** Time is allocated to the formal completion of job walk downs and Job Safety Analysis. Engineered and purchased solutions may require financial investment but provide more permanent and more comprehensive solutions to mitigate hazards. Resources invested include our Safety Management System – Intelix – and our Learning Management System (LMS) in addition to the development of training materials and the policies/plans.
- Guiding Documents:** MPW Policy PO-HS-101: Hazard Identification & Risk Assessment; PO-HS-103: Personal Protective Equipment, PO-HS-169 Working Alone, and PO-HS-143: Stop Work Authority, among others, contain our guidelines. Multiple OSHA standards in 29 CFR § 1910 and Canadian SOR/86-304 Section 19.3 provide the basis for this policy and sub-program.

- Executive Summary:** The hazardous substances sub-program correlates with the hazard communication sub-program and ensures employees are aware of information needed to protect themselves and others. It also ensures teams adhere to law, regulation, policy, and procedure, as well as customer mandates. Chemicals and hazardous substances at work (and home) pose both physical and health hazards. The focus is on any work or operations where employees may be exposed to hazardous or potentially hazardous substances or during any foreseeable emergency.
- Administrator(s):** General Managers; and Director of Safety & Training
- Administrator Duties:** Administrator ensures the requirements of the hazardous substances sub-program and OSHA standards are met at each worksite and facility. Coordinate with Director, Safety & Training to improve programs and policies.
- Reporting:** Environments with known hazardous substances must be monitored and reported when levels exceed the action level or PEL. Additionally, chemical spills and exposures must be reported immediately in our Safety Management System – Intelix – for investigation.
- Documentation:** As necessary, workplaces which exceed the Action Level or PEL of hazardous substances are monitored and documented. Additionally, current SDSs and labels are maintained for all materials.
- Training:** Training must meet OSHA standards and be completed before employees are exposed to hazardous materials. Training can be material specific or categorical (flammable, corrosive, reactive, toxic, radioactive). Training records are completed and maintained either on paper, digitally, and/or in the MPW Learning Management System (LMS).
- Resource Allocation:** Resources invested include the development of training materials, MPW eCourses, and site-specific training. Also, there is the time to develop and communicate policy, reports, reviews, and corrective actions. Finally, there are materials needed for handling and safety.
- Guiding Documents:** MPW policy PO-HS-181: Hazardous Substances provides categorical and chemical specific information for many substances in which employees have potential exposure. PO-HS-153 Air Monitoring & Sampling ensures adequate assessment and measurement of potentially hazardous atmospheres. PO-HS-116: Hazard Communication Program contains our guidelines for communication. Additional policies reference hazardous materials including PO-HS-142 Hazardous Materials Storage & Handling and PO-HS-128 Process Safety Management, as appropriate. OSHA standards 29 CFR § 1910.1000 through 29 CFR §1910.1096, and Canadian SOR/86-304 Part X provide the basis for this policy and sub-program.

Executive Summary: The hearing conservation sub-program ensures employees understand the hazards posed by noise exposure, know the proper way to protect themselves from exposure, and that employees working in environments that exceed the acceptable threshold are enrolled in the program. It also ensures teams adhere to law, regulation, policy, and procedure, as well as customer mandates.

Noise assessments start with workplace monitoring, identifying workplaces that exceed the 85 decibel level standard, on an 8-hour time-weighted average. The first line of defense is implementing engineering and administrative solutions that remove or reduce noise hazards. After initial noise reduction, employees who continue to be exposed above the threshold are enrolled in the program, required to wear hearing protection, and subjected to annual audiometric testing. This sub-program is in place to prevent temporary or permanent hearing loss due to work noise hazards.

Administrator(s): General Managers; Company doctor; and Director of Safety & Training

Administrator Duties: Administrator ensures the requirements of the hearing conservation sub-program and OSHA standards are met at each worksite and facility. Coordinate with the Director of Safety & Training to improve programs and policies.

Reporting: All work that exceeds safe noise exposure limits must be reported and mitigated. Employees receiving audiometric testing and exhibiting a standard threshold shift will be notified in writing and their results will be recorded. Significant unexpected noise exposure must be reported immediately and submitted as an incident in our Safety Management System – Intelex – for investigation. We report and retain records in accordance with HIPPA and in compliance with local laws, regulations, and customer policies.

Documentation: Work areas that exceed permissible levels of exposure will be documented and signs will be posted to notify employees of the required use of hearing protective devices. Audiometric test results are documented and retained in compliance with OSHA standards.

Training: Training is required prior to work that requires hearing protection that could result in unacceptable exposures. Initial is instructor-led, and includes proper selection, use, and fit of protective equipment. Site-specific and continued training are required, to include initial and refresher eCourse training as necessary. Training records are completed and maintained on paper, digitally, and/or in the MPW Learning Management System (LMS).

Resource Allocation: There is time allocated to the proper inspection and preparation of work areas, as well as the purchase of approved and required equipment. Resources invested include the development of training materials, dosimeters, MPW LMS, and the policy/plan itself. Finally, facility improvements and structures are maintained and prepared.

Guiding Documents: MPW Policy PO-HS-119: Hearing Conservation Program contains our guidelines. OSHA standard 29 CFR § 1910.95 and SOR/86-304 Part VII provide the basis for this policy and sub-program.

Hydro- & Pneumatic- (Soft) Excavation

Executive Summary: The hydro- and pneumatic- excavation, or soft excavation, sub-program ensures employees safely prepare, plan for, and conduct excavation work, understanding the hazards of both the equipment they use and the environments in which they work. It also ensures teams adhere to law, regulation, policy, and procedure, as well as customer mandates. Soft excavation includes the use of either hydro (water pressure) or pneumatic (air-lancing/air-spading) equipment in combination with a vacuum system for the purpose of excavation.

This sub-program outlines the requirements for conducting soft excavation and working in and around excavations and trenches. Prior to starting this type of work or working near it, we must contact utility companies or the owner for the location of all underground installations and infrastructure. All affected areas must be inspected and checked by a competent person for variations and impacts to the ground, underground installations, and adjacent or affected above ground structures. The use of ladders or other access equipment is addressed, as is the use of additional equipment in relation to employee exposure. Trenches that meet requirements are treated as confined spaces, requiring confined space permits and rescue planning. Soil classification and sloping/benching are outlined, with soil type and slope allowances.

Administrator(s): President, Porta Kleen; General Manager, IS; and Director of Safety & Training

Administrator Duties: Administrator ensures the requirements of the soft excavation sub-program and OSHA standards are met at each worksite and facility. Coordinate with Director of Safety & Training to improve programs and policies.

Reporting: All excavation violations must be reported immediately and submitted as an incident in our SHE Management System for investigation. We report excavation work in compliance with local laws, regulations and customer policies.

Documentation: Managers maintain lists of competent people to do work at their sites. All work involving soft excavation is recorded on a Job Safety Analysis or similar risk assessment/mitigation document. Excavation and/or trenching permits are required and maintained. If there are underground hazards, installations, or infrastructure, they are recorded and avoided.

Training: Training is required prior to hydro- and pneumatic excavation work. Initial general and foundational safety training is instructor-led, based on OSHA requirements. Specific equipment training is then required, in addition to site-specific and continued training, to include initial and refresher eCourse training. Training records are completed and maintained on paper, digitally, and/or in the MPW Learning Management System (LMS).

Resource Allocation: There is time allocated to the proper inspection and preparation of work areas, as well as the purchase of approved and required equipment. Resources invested include the development of training materials, MPW LMS, and the policy/plan itself. Finally, facility improvements and structures are maintained and prepared.

Guiding Documents: MPW Polices PO-HS-111: Hydro and Pneumatic (soft) Excavation, PO-HS-161: Waterjetting, and PO-HS-108: Confined Space Entry contain our guidelines. OSHA standard 29 CFR § 1926 Subpart P and Canadian SOR/86-304 Section 3.12 provide the basis for this policy and sub-program.

Incident Response, Investigation & Management

Executive Summary: The incident response, investigation and management sub-program ensures the response to work-related incidents prioritizes employees, co-workers, and families. Leaders must professionally respond and communicate to ensure root cause, corrective actions, and accountability promptly correct issues and guarantee a safe return to work for employees, vendors, customers, and other affected parties. It also ensures teams adhere to law, regulation, policy, and procedure, as well as customer mandates.

The sub-program outlines roles and responsibilities to prepare for when culture, systems, processes and employees do not prevent incidents. Our approach is progressive, regardless of severity, to care for people and the business, while learning and improving to prevent future issues. Incident reviews are mandated, involving executives, managers, supervisors, and affected employees. The sub-program also outlines crisis response team activities. Of note, our safety observations provide reports that aid leader assessments using web-based and mobile platforms. Our systems ensure accountability.

Administrator(s): President, MPW; General Managers; and Director of Safety & Training

Administrator Duties: Administrator ensures the requirements of the incident response, investigation and management sub-program and OSHA standards are met at each worksite and facility. Coordinate with Director of Safety & Training to improve programs and policies.

Reporting: Incidents must be reported immediately and submitted as an incident in our Safety Management System – Intelx – for investigation. Reports of incidents are maintained and routinely provided to leaders.

Documentation: Our safety management system – Intelx – is our program of record, housing documentation of all observations, investigations, and incidents. We gather, report on, and maintain data to support root cause analysis and corrective action continuity. The system can and does generate documents for all purposes. It is the expectation of MPW that all incidents (near misses, injuries, vehicles, etc.), hazards, or safety and health concerns shall be documented in Intelx– without fear of retaliation.

Training: Managers are trained from first report of incident through investigations to actions, communication, and follow up in the Safety Management System – Intelx. Training records are completed and maintained on paper, digitally, and/or in the MPW Learning Management System (LMS).

Resource Allocation: Resources invested include our Safety Management System – Intelx – and our Learning Management System (LMS). In addition, development of training materials and the policies/ plans, as well as time and expenses related to thorough investigations.

Guiding Documents: MPW Policies PO-HS-144: Incident Response, Investigation & Management; PO-HS-101: Hazard Identification & Risk Assessment; and PO-HS-168 Emergency Action Plan, as well as Intelx user instructions, among others, contain our guidelines. Multiple OSHA standards, like 29 CFR § 1904, in addition to Canadian SOR/86-304 Part XV, provide the basis for this policy and sub-program.

Executive Summary: The industrial vacuuming sub-program ensures employees know how to safely plan, prepare for, and conduct vacuuming operations, while being aware of and mitigating hazards related to their work. It also ensures teams adhere to law, regulation, policy, and procedure, as well as customer mandates. We follow WJTA's Recommended Practices for the Use of Industrial Vacuum Equipment (Blue Book).

This sub-program sets parameters and expectations for employees conducting vacuuming operations. It outlines and reviews equipment required for safe operations including the mandatory use of safety T's and grounding vacuuming equipment to prevent injury due to the release of accumulated static electricity. Vacuuming operations are detailed, including safe work practices and the roles of employees involved in the work. Communication is emphasized between vacuum operators and technicians conducting the work. Hazardous and hot material work is addressed, with specific requirements for both.

Administrator(s): General Manager IS and Director of Safety & Training

Administrator Duties: Administrator ensures the requirements of the industrial vacuuming sub-program and WJTA guidelines are met at each worksite and facility. Coordinate with the Director of Safety & Training to improve programs and policies.

Reporting: Industrial vacuuming violations must be reported immediately and submitted as an incident in our Safety Management System – Intelix – for investigation. We report variances in compliance with MPW and customer policies.

Documentation: Managers maintain lists of competent people to do work at their sites. If there are conditional hazards, they are recorded on a Job Safety Analysis or similar risk assessment/mitigation document.

Training: Training is required prior to vacuuming work. Initial general and foundational safety training is a combination of instructor-led and on-the-job instruction. Operators receive additional equipment specific training. Training records are completed and maintained on paper, digitally, and/or in the MPW Learning Management System (LMS).

Resource Allocation: There is time allocated to the proper inspection and preparation of work areas, as well as the purchase of approved and required equipment. Resources invested include providing operators WJTA Blue Books, the development of training materials, MPW LMS, and the policy/plan itself. Finally, equipment improvements are evaluated and conducted.

Guiding Documents: MPW Policy PO-HS-109: Industrial Vacuum Operations contains our guidelines, which references WJTA's Recommended Practices for the Use of Industrial Vacuum Equipment OSHA standards 29 CFR § 1910.399, 1910.307, and 1910.1200 among others, including applicable Canadian OHS standards (SOR/86/304), provide the basis for this policy and sub-program.

- Executive Summary:** Managing Health & Safety sub-program is primarily focused on the administration of our program, policies, procedures, forms, processes, and systems. This includes our structure from executive safety committee down to local level as well as tasks like documentation, record keeping, reporting, etc. Committees must conduct research, evaluate data, review issues, provide and share information, recommend actions, and take actions focused on improving safety across their group and company. This is foundational to our company's safety and health culture and the climate we intend to set and support. This sub-program covers stop work authority. Stop work is the ideology that anyone aware of a behavior, condition, or situation where injury, illness, or environmental harm is possible has the authority, responsibility, and obligation to stop work and act, eliminating and/or mitigating hazards.
- Administrator(s):** General Managers; Company Doctor; and Director of Safety & Training
- Administrator Duties:** Administrator ensures the requirements of the managing safety & health sub-program and OSHA standards are met at each worksite and facility. Coordinate with the Director of Safety & Training to improve programs and policies.
- Reporting:** All incidents and near-misses must be reported immediately and submitted as an incident in our Safety Management System – Intelix – for investigation. Affected employees will be notified by the appropriate means in accordance with OSHA. We report in accordance with HIPPA and in compliance with local laws, regulations and customer policies.
- Documentation:** Significant stop work action must be reported through the management chain to the General Manager within one hour, and they must also be entered in the SMS. Safety committee meeting minutes, including date, time, attendee names, ideas and issues discussed, recommendations, and responsible person(s) by topic; minutes must be retained for three years.
- Training:** Initial general and foundational safety training is instructor-led, based on OSHA recommendations. Specific task analysis is part of on-site performance evaluations and Job Safety Analysis training. Training records are completed and maintained on paper, digitally, and/or in the MPW Learning Management System (LMS).
- Resource Allocation:** There is time allocated to conduct the safety committee meetings and ongoing follow-up to those meetings, as needed. Equipment and process support is resourced to validate work site hazards. Resources invested include the development of training materials, MPW LMS, and the policy/plan itself. Finally, performance is evaluated, and improvements prioritized.
- Guiding Documents:** MPW Policies PO-HS-143 Stop work Authority, PO-HS-149 Safety Committees, PO-HS-158 Injury & Illness Prevention Program, and PO-HS-164 General Safety & Housekeeping and more contain our guidelines. OSHA standards 29 CFR § 1910.1018 (n), 1910.1028, in addition to Canadian SOR/86-304 Section 10.7, provide the basis for this policy and sub-program.

Executive Summary: The mobile equipment and material handling sub-program ensures employees are aware of the hazards of material handling operations, equipment, and lifts, as well as outlining safe work guidelines and hazards associated with this type of work in all environments. It also ensures teams adhere to law, regulation, policy and procedure, as well as customer mandates.

This sub-program governs the use and training for material handling equipment, equipment associated with material handling and lifting, and mobile elevated work platforms. All equipment is inspected prior to operation, and all operators follow standard requirements for movement, restraints, and customer or site requirements. The operation of equipment around workers and hazards is addressed, as is the operation of equipment in relation to docks and loading platforms. Loads must be secure and safe for travel and must not exceed safe guidelines for weight, size, and visibility. This sub-program also provides guidance for overhead lifting when non-motorized equipment is being used to lift materials.

Administrator(s): Director of Engineering & Maintenance and Director of Safety & Training

Administrator Duties: Administrator ensures the requirements of the material handling, mobile equipment, and lifting equipment sub-program and OSHA standards are met at each worksite and facility. Coordinate with the Director of Safety & Training to improve programs and policies.

Reporting: Material handling, equipment, and lifting deficiencies must be reported immediately and submitted as an incident in our Safety Management System – Intelex – for investigation. We report variances in compliance with local laws, regulations, and customer policies.

Documentation: All mobile equipment and lifts have routine inspections documented and are maintained properly, with proper signage and operating manuals.

Training: Initial general and foundational safety training is instructor-led, based on OSHA requirements. Specific material handling, equipment, and lift training is instructor led and includes a requirement for on-site performance evaluation and refreshed at least every three years. Training records are completed and maintained on paper, digitally, and/or in the MPW Learning Management System (LMS).

Resource Allocation: There is time allocated to the proper inspection and preparation of equipment, as well as the purchase or rental of quality devices and preventive/emergency maintenance. Resources invested include the development of training materials, MPW LMS, and the policy/plan itself. Finally, equipment upgrades are evaluated and conducted.

Guiding Documents: MPW Policies PO-HS-122: Mobile Equipment, PO-HS-125: Overhead Lifting & Cranes, PO-HS-160 Rail Safety, and PO-HS-183 Loading Docks, and others contain our guidelines. OSHA standards 29 CFR § 1910.178, 29 CFR § 1910.68, 29 CFR § Subpart N, 29 CFR 1926.554, and 29 CFR 1926.556, ANSI standards B56.1-1969 and A92.2- 1969, Canadian SOR/86-304 Section 14.20, and others provide the basis for this policy and sub-program

Executive Summary: The respiratory protection sub-program ensures employees know how to safely prepare, plan, and conduct, work that requires respiratory protection. It also ensures teams adhere to law, regulation, policy, and procedure, as well as customer mandates. Any worker potentially exposed to unhealthy atmospheric conditions must comply with the respiratory protection sub-program. Engineering and administrative controls are the first line of defense for respiratory protection.

From dust masks to supplied air respirators, this program outlines the steps needed to ensure teammates are protected. It also addresses training and refreshers, including fit tests. Employees must undergo successful medical screening to clear them for the use of respiratory protection prior to personal protective equipment being issued. Additionally, all affected employees must participate in the job hazard analysis process to ensure they understand the hazardous atmosphere they are entering.

Administrator(s): General Managers, Company Doctor, and Director of Safety & Training

Administrator Duties: Administrator ensures the requirements of the respiratory protection sub-program and OSHA standards are met at each worksite and facility. Coordinate with the Director of Safety & Training to improve programs and policies.

Reporting: Respiratory protection violations and accidental exposures to airborne contaminants above permissible levels must be reported immediately and submitted as an incident in our Safety Management System – Intelix – for investigation.

Documentation: Medical clearances are documented and maintained in accordance with HIPPA standards. Respirator fit tests for each type of respirator are documented and retained, for initial, annual, and as needed changes.

Training: Initial general and foundational safety training is instructor-led, based on OSHA requirements to support the overall program. Specific task analysis is part of on-site performance evaluations and Job Safety Analysis training, intended to identify the proper respirators and filters. Training records are completed and maintained on paper, digitally, and/or in the MPW Learning Management System (LMS). Training includes fit testing, maintenance, proper donning and doffing methods, how to use the equipment, and how to monitor atmospheres.

Resource Allocation: There is time allocated for medical clearance and follow-up pulmonary function testing when necessary. Time is also allocated to the proper analysis of jobs, as well as fit testing, selecting, and issuing the correct respirators and filters (if applicable) for the hazards encountered. Where possible, we invest in automated tools and engineered solutions to remove people from hazards and improve processes. Resources invested include the development of training materials, MPW LMS, and the policy/plan itself.

Guiding Documents: MPW Policy PO-HS-129: Respiratory Protection Program contains our guidelines. OSHA standard 29 CFR § 1910.134 and Canadian SOR/86-304 Section 12.13 provide the basis for this policy and sub-program.

Executive Summary: The training and development sub-program ensures employees are trained and aware of opportunities, as well as requirements to comply with mandates and excel at safe work. It also ensures teams adhere to law, regulation, policy, and procedure, as well as customer mandates. The sub-program is intended to outline and direct our hybrid approach to in-house and vendor provided instructor-led, webinar, and online/eCourse training and development opportunities. The goal is to improve performance and support growth.

Compliance is an executive and MPW priority, partnering with leaders, trainers, and safety professionals across MPW and our network of customers. Procedures and offerings support workers being trained and refreshed, as needed (including on-the-job by a competent person), prior to task performance and/or expiration of a requirement; business groups have safety-focused, standardized new hire orientation and basic training programs; more advanced courses are offered to support growth, incorporating our LMS; development initiatives support performance and potential across the company. Most content is developed in-house, is safety-focused and unique to MPW.

Administrator(s): Director of Safety & Training

Administrator Duties: Administrator ensures the requirements of the training and development sub-program and OSHA standards are met at each worksite and facility. Coordinate with operations and support function leaders to improve programs and policies.

Reporting: Training reporting occurs monthly, highlighting all those meeting or exceeding goals as well as those falling short. The mobile, online LMS provides automatic reports on demand.

Documentation: Documentation primarily relies on the MPW LMS: eCourses are automatically documented. If a class is completed outside the system, a training record is required. That record is filed and manually recorded in the LMS or documented locally, as in the case of on-the-job training. Documentation includes commitment forms, test results, and so on.

Training: Training is required prior to work. Initial general and foundational safety training is instructor-led, based on OSHA requirements. Specific training based on job duties is then required. Training and development are conducted through classroom, on-the-job, and eCourse platforms. In addition to specific training, site specific and continued learning is required. Training records are completed and maintained on paper, digitally, and/or in the MPW Learning Management System (LMS). We also provide development opportunities.

Resource Allocation: Time is allocated to requirement reviews and we purchase approved materials, systems, and equipment. Resources include training materials, MPW LMS, and the policy/plan itself. Finally, facility improvements and structures are maintained and prepared for training.

Guiding Documents: MPW Policy PO-HR-127: Training and Development, among others, contain our guidelines. Multiple OSHA standards in 29 CFR § 1910 and Canadian SOR/86/304 Part XIX provide the basis for this policy and sub-program.

Executive Summary: The variations sub-program ensures employees know about the requirement to request and gain approval for a variance whenever conditions or requirements dictate a variation from established MPW policies and procedures, as well as ensuring the steps to gain approval for and follow through with a variance are clear and completed. It also ensures teams adhere to law, regulation, policy, and procedure, as well as customer mandates. This sub-program does not address variations from OSHA standards, it is focused on variations from MPW policy and/or procedure.

There is also the possibility that we may need to seek a variance from a customer policy or procedure, which is handled through customer channels and guidelines. Any variance from established MPW policy must be requested and approved, in accordance with the business unit procedure for requesting and approving variations. Variations are written and must be maintained on file, but they can be approved verbally by approval authorities after gathering and analyzing all relevant information. Every effort will be made to find a workable solution that does not require a variance, and all variations must demonstrate the same level of safety and effectiveness as the written policy or procedure.

Administrator(s): General Managers and Director of Safety & Training

Administrator Duties: Administrator ensures the requirements of the variations sub-program and OSHA standards are met at each worksite and facility. Coordinate with the Director of Safety & Training to improve programs and policies.

Reporting: Variance deviations, incomplete variations, and procedure/policy violations must be reported immediately and submitted as an incident in our Safety Management System – Intelex – for investigation. We disseminate a monthly variance report, as a tool to determine where we need to invest in education or tools.

Documentation: All variations must be documented on the variance form and maintained with job paperwork, including the Job Safety Analysis and all relevant permits or supporting materials. Employees must be aware of the variance.

Training: Initial general and foundational safety training is instructor-led, based on OSHA requirements. Specific training is, then, required, in addition to site-specific and continued training, to include initial and refresher eCourse training. Our training emphasizes OSHA standards, policy, and procedure. Training records are completed and maintained on paper, digitally, and/or in the MPW Learning Management System (LMS). We also provide development opportunities.

Resource Allocation: Initial general and foundational safety training is instructor-led, based on OSHA requirements. Specific training is, then, required, in addition to site-specific and continued training, to include initial and refresher eCourse training. Our training emphasizes OSHA standards, policy, and procedure. Training records are completed and maintained on paper, digitally, and/or in the MPW Learning Management System (LMS). We also provide development opportunities.

Guiding Documents: MPW Policy PO-HS-145: Variations and PO-HS-161: Waterjetting contains our guidelines. Multiple OSHA standards in 29 CFR § 1910 and Canadian OHS standards (SOR/86/304) provide the basis for this policy and sub-program.

Executive Summary: The waterjetting sub-program ensures employees know how to safely plan, prepare for, and conduct waterjetting operations, while being aware of and mitigating hazards related to their work. It also ensures teams adhere to law, regulation, policy, and procedure, as well as customer mandates. This sub-program sets parameters and expectations for employees exposed to waterjetting operations and equipment.

Our sub-program follows the industry standard as published by the WaterJet Technology Association (WJTA). It outlines and reviews equipment used and best practices for safe operations. When applicable automated solutions are the preferred practice, removing personnel from high hazard areas. It requires that waterjetting operations are set up to prevent injury due to the hazards associated with high pressure water in industrial settings. Communication is emphasized between pump operators and technicians conducting the work, as well as notification of affected workers. Waterjetting operations are detailed, including safe work practices and the location of employees involved in the work.

Administrator(s): General Manager, IS and FEM; Director of Engineering & Maintenance; and Director of Safety & Training

Administrator Duties: Administrator ensures the requirements of the waterjetting sub-program and WJTA guidelines are met at each worksite and facility. Coordinate with Director of Safety & Training to improve programs and policies.

Reporting: Waterjetting violations must be reported immediately and submitted as an incident in our Safety Management System – Intalex – for investigation. We report variances in compliance with local laws, regulations and customer policies.

Documentation: Managers maintain lists of competent people to do work at their sites. Hazards are recorded on a Job Safety Analysis or similar risk assessment/mitigation document. Waterjetting safety variance permits are also documented and submitted to the engineering department to develop solutions.

Training: Training is required prior to waterjetting work. Initial general and foundational safety training is a combination of instructor-led and on-the-job instruction. Operators receive additional equipment specific training. Training records are completed and maintained on paper, digitally, and/or in the MPW Learning Management System (LMS).

Resource Allocation: There is time allocated to the proper inspection and preparation of work areas, as well as the purchase of approved and required equipment. Resources invested include automated solutions, providing operators with WJTA Orange Books, the development of training materials, MPW LMS, and the policy/plan itself. Finally, equipment improvements are evaluated and conducted.

Guiding Documents: MPW Policy PO-HS-161: Waterjetting contains our guidelines. The WJTA provides the basis for this policy and sub-program, as well as multiple OSHA and Canadian OHS standards.

Executive Summary: The working at heights sub-program provides safe work practices for working in situations where there is a risk of fall or falling objects. This includes but is not limited to open sided platforms, mobile elevated work platforms (MEWP), scaffolding, ladders, and roofs. It also ensures employees adhere to law, regulation, policy, and procedures, as well as customer mandates. MPW recognizes all fall prevention scenarios as unique and requiring assessment by a competent person.

Fall protection is required when working at any height four feet or greater, while working from MEWP's, and while working six feet from a leading edge. Engineering solutions are always preferred to eliminate fall hazards prior to the implementation of personal fall protection/prevention equipment. When personal fall arrest systems are utilized employees are required to assess risk and plan rescue as well as select fall prevention/personal protective equipment based on swing fall, total fall distance, and situational hazards. Equipment shall be properly maintained and inspected in accordance with manufacturers recommendations.

Administrator(s): General Managers and Director of Safety & Training

Administrator Duties: Administrator ensures the requirements of the working at heights sub-program and OSHA standards are met at each worksite and facility, including fall and rescue planning are completed and clear. Coordinate with Director of Safety & Training to improve programs and policies.

Reporting: Fall protection violations must be reported immediately and submitted as an incident in our Safety Management System – Intelix – for investigation.

Documentation: Annual inspections are documented. Fall events are documented in our Safety Management System – Intelix – and routinely reported on. Customer site hazards are also documented and communicated.

Training: Training is required prior to work that requires fall protection for working at heights. Initial is instructor-led, based on OSHA requirements. Site-specific and continued training are required, to include initial and refresher eCourse training. Training records are completed and maintained on paper, digitally and/or in the MPW Learning Management System (LMS).

Resource Allocation: There is time allocated to job planning prior to working at heights which includes equipment inspection and rescue planning. Resources invested include the purchase of quality fall protection equipment, development of training materials, advanced training for competent persons, MPW LMS, and the policy/plan itself. Finally, specialized equipment, engineered solutions, and facility improvements are proposed.

Guiding Documents: MPW Policy PO-HS-112: Working at Heights, among others, contains our guidelines. OSHA standards 29 CFR § 1910.28 – 29 and 29 CFR § 1910.140, and Canadian SOR/86-304 Section 12.6, provide the basis for this policy and sub-program.



Program Summary

VII. Summary & Review.

Measurements guide analysis and corrective actions gauge performance of the program. Our program measures organizational and personal performance to ensure employee safety, with an emphasis on prevention and leading indicators to change behaviors. Incidents are thoroughly investigated to learn root causes, with an intent to share best practices. The following is emphasized to summarize and exceed goals:

- Committing to zero incidents being attainable is the first step, and at the core is accountability.
- Employees receive guidance on expectations of their rolls and responsibility, and culture. Clarity in roles and responsibilities are incorporated in performance reviews, policies, and procedures.
- The next step is our Safety Management System for observations, incidents, investigations, and more; this system ensures company-wide access to all reporting and analysis.
- Our training and development approach is supported by our curriculum, the Learning Management System, and competent trainers. We train our staff prior to work and while on-the-job under the direction of a competent person.
- Throughout the company Safety Committees have been established. Committees prioritize tasks, review trends, direct and follow up on corrective actions, and review and recognize observations.
- Audits and inspections are conducted during projects, jobs and/or shifts.
- When near-misses or reports of non-conformity are recognized, leaders act.
- Our required monthly observations support learning from unsafe conditions and behaviors, requiring employees to submit observations and we support with resources and actions.
- Next, fit-for-duty reviews are mandated. Our fit-for-duty review system is mandated as part of daily job preparation and employees are encouraged to monitor fatigue and act.
- PPE and safety equipment are provided, with orders to inspect and properly wear and use gear.
- When work is undertaken, a clear and easy to read Job Safety Analysis or equivalent document is on hand, communicated, signed by affected workers, and followed. Employee awareness and ownership are essential.
- Next, employees are required to STOP WORK if they do not feel safe or the situation is unsafe and encouraged to provide feedback or take action that improves safety.
- Policies, procedures, forms, and documents augment employee and leader actions. All policies and procedures are based on best practices as well as regulatory and industry standards.
- And, finally, our systems drive active measures, including executive reviews to ensure we act on opportunities, learn and improve by converting a lagging indicator to leading safely.

VIII. Closing.

Since 1972, MPW has been an industry-leader and it shows in our commitment to our people, positive culture and program, processes and systems. Studies show that programs like this benefit people by:

- Preventing incidents and injuries and safe work.
- Improving compliance with laws and regulations.
- Providing a healthy work environment.
- Enhancing sustainability and environmental awareness, including social responsibility.
- Increasing productivity and enhancing overall business operations.
- Reducing costs, including significant reductions in workers' compensation and auto claims.
- Making our families, communities, vendors and customers safer.

Therefore, we are committed to our program and the target of zero incidents. We rely on employee ownership to continue receiving these benefits and achieve our shared vision. This living document is oriented on continuous improvement; send ideas to leaders or the Director of Safety & Training.

IX. Revision History.

Document Approval: 07-03-2019

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