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Prepared for All Employees

8370 Jumpers Hole Rd.

Millersville, MD 21108

SAFETY MANUAL

LENDERKING

BASIC SAFETY PROGRAM

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BASIC SAFETY PROGRAM

STATEMENT OF POLICY

I do not consider any part of the operation to have greater importance than the prevention of accidents. Therefore, it is the policy of this company to provide its employees a safe and healthy work place and to follow procedures aimed at safeguarding all employees. Accident prevention and efficiency in production go together. Neither should be given priority over the other.

Safety is everyone's responsibility. I expect every member of supervision to devote the time and effort necessary to ensure the safety of his/her employees at all times.

Michael Semenuk
President

SAFETY POLICIES

1. The management of LENDERKING considers no phase of operation of administration as being of greater importance than accident prevention.
2. LENDERKING will provide and maintain a safe work place and follow operating practices that will safeguard all employees and result in safe working conditions and efficient operations.
3. The foreman/supervisor is the key person in the Safety Program. No foreman/supervisor may ever be relieved of his part of his responsibilities for safety.
4. It is the responsibility of each employee to prevent injury to himself and to others and to assist fellow employees in achieving the same goal. An employee's willingness to work in a safe manner is a condition of employment at LENDERKING.
5. All elements of the Safety Policy Manual will be followed at each plant. Any exceptions to any phase must be approved by the President.

RESPONSIBILITIES OF MANAGEMENT

Management:

1. Takes responsibility for setting the safety example for the office, yard and the plants.
2. Establishes controls to ensure performance within the elements of the Safety Program.
3. Reviews plant and yard safety performance and discusses safety in regular staff meetings.
4. Delegates areas of responsibility for specific safety activities to his subordinates and holds them accountable for performance.
5. Evaluates staff safety performance.
6. Provides support for the Plant Safety Committee and the Safety Director.

RESPONSIBILITIES OF THE SHOP OPERATIONS MANAGER

The plant superintendent:

1. Establishes and assures proper functioning of the Plant Safety Committee.
2. Ensures all new employees have been properly screened for employment with background verifications and drug screening.
3. Establishes schedule of required inspections - mobile equipment, chains, hoists, fire extinguisher, machine guarding, etc. Written safety inspections will be conducted at least monthly for all areas of the shop and yard.
4. Reviews all safety inspection reports and sets correction dates and priorities for correction of noted deficient conditions.
5. Reviews all accident reports and investigations to ensure thorough investigation, identification of causes and expedient corrective action.
6. Requires strict enforcement of the wearing of personal protective equipment.
7. Establishes controls to assure that proper housekeeping is practiced in the plant and yard.
8. Reviews training program and procedures for all employees performing new jobs, either as new employees or changes in job assignments.
9. Investigates all serious accidents resulting in disabling injuries.
10. Personally accompanies injured employee (during normal working hours) to emergency room, clinic, etc. Provides support to injured employee regarding insurance coverage and any other concerns. Provides necessary information to medical personnel. Remains until employee is released or admitted. If employee is admitted, plant superintendent notifies designated person to contact in case of injury to employee (wife, mother, etc.).
11. Ensures all applicable regulatory standards, safe work practices and conditions are followed at all times throughout the facility. Plant superintendent must be familiar with OSHA regulations, work standards and practices to ensure compliance.

RESPONSIBILITIES OF THE PLANT SAFETY COMMITTEE

The Plant Safety Committee:

1. Ensures communication between all levels of management, supervisor and employees in safety and loss control management programs.
2. Safety committee:
 - a. Will meet on a quarterly basis and forward summary reports to plant superintendent and corporate management.
 - a. Consists of at least one member of management, front line foreman and an hourly employee. New members of the committee should be elected by the employees every six months or as needed.
 - b. The Safety Director is a standing member of the committee.
3. Reviews all plant accident investigations to ensure necessary corrective actions are taken.
4. Assists in the design, development and providing of all safety training activities for plant and supervisory employees.
5. Reviews all plant inspections to determine necessary actions to be taken in order to reduce occurrence of deficient conditions.
6. Reviews safety activities of other plants to determine application to their plant.
7. Reports to management any needed changes in the safety program for the plant.
8. Committee may wish to perform inspections, attend safety meetings or meet with individual supervisors, foremen and employees to determine effectiveness of safety program.

RESPONSIBILITIES OF THE SAFETY DIRECTOR

The Safety Director:

1. Serves as a source for information regarding training programs, safety concerns and regulations pertaining to plant and employee safety.
2. Updates safety committee and management regarding of any new regulatory safety items or other areas of concern.
3. Acts as liaison between any safety agencies, i.e., OSHA, insurance company.
4. Serves as standing member of all plant safety committees. Provides necessary guidance and assistance to other members.
5. Provides assistance and training as necessary to supervisors in accident investigations, safety training and facility inspections.
6. Conducts at least one physical inspection of each plant on a monthly basis to serve as a comparison tool for management, plant safety committee and others.
7. Monitors at least one safety meeting per month at each facility to determine effectiveness of meetings.
8. Maintains log of all training activities and inspections to ensure guidelines are being followed for all employees at each plant.

RESPONSIBILITIES OF THE FOREMAN

The foreman is directly responsible for the safety of employees under his direction as follows:

1. Indoctrinates new employees on safety and conducts follow-ups to evaluate new employees' safety performance.
2. Instructs and enforces the safe work procedures and safe practices.
3. Makes at least one personal individual safety contact per month with each employee. This may be to review a safety procedure or to compliment an employee on safe performance.
4. Provides and maintains safe, healthful work areas, safe equipment and tools.
5. Makes safety an integral part of job instruction.
6. Provides employees with personal protective equipment as required and enforces its use.
7. Stays alert to potential hazards and encourages employees to report potential hazards.
8. Takes actions to eliminate potential hazards.
9. Meets company standards of housekeeping and fire prevention.
10. Conducts safety meetings with employees at least once a week. Maintains written records of meetings and attendance.
11. Obtains medical aid for ill or injured employees. Notifies plant superintendent regarding injured employees prior to transporting employee to medical care, or as soon as possible thereafter. Remains until employee is released or admitted. If employee is admitted, foreman notifies plant superintendent immediately.
12. Reports and thoroughly investigates all accidents immediately.

RESPONSIBILITIES OF THE EMPLOYEE

The employee:

1. Obeys the safety rules.
2. Follows safe job procedures. Never takes short cuts.
3. Keeps work area clean and free from slipping or tripping hazards.
4. Uses prescribed personal protective equipment.
5. Reports all malfunctions of equipment immediately to supervisor.
6. Lifts and carries with care.
7. Observes restricted areas and all warning signs.
8. Knows emergency procedures.
9. Reports unsafe conditions to supervision.
10. Promptly reports every accident and injury to his/hersupervisor.
11. Follows the care prescribed by the attending physician when treated for an injury or illness.
12. Attends all employee safety meetings.
13. Participates in accident investigations, serves on plant safety committee or other loss control activities as needed.

REPORTING AND INVESTIGATION OF ACCIDENTS

Successful accident prevention requires thorough reporting and investigation of every accident and near-accident as follows:

1. Supervisors must complete and submit an accident report immediately and no later than 24 hours after the accident.
2. The supervisor shall make an immediate investigation and report of every disabling injury or any other serious injury, as well as the near-misses he deems pertinent.
3. Supervisors are responsible for this reporting and investigating activity and may be assisted by the Safety Committee.
4. Accident investigations must be made within 24 hours and the accident investigation report will accompany the accident report to plant management and the safety committee.
5. Accident investigation is a device for preventing accidents. Investigation must be for fact finding, not fault finding.
6. Supervisor and/or management will immediately take any corrective action necessary to prevent additional injury. Such action will be reviewed by the Safety Committee to determine if all necessary corrective measures have been taken. It is the supervisor's/management's responsibility to complete the investigation.

SHOP INSPECTIONS

Physical plant conditions and employee work habits are to be addressed in order to control safe working conditions in the plant.

1. The plant superintendent is responsible for designating required inspection periods and the individuals to conduct the inspection.
2. Plant inspections will be made at least monthly by the area foreman or his designate. In any case, the foreman is responsible for insuring that the written inspection is completed properly.
3. Supplemental inspections may also be made by the Plant Safety Committee and/or Safety Director.
4. LENDERKING "Safety Inspection Report" will be used to record the results of the plant inspection.
5. The inspection report will be filled out during the inspection as follows:
 - a. Enter the name of the departments which are to be inspected on the form.
 - b. Each foreman or designate will inspect his/her area and complete the portion of the report which pertains to that area.
 - c. Priorities will be assigned to correcting unsafe conditions which are noted during the inspection. The plant superintendent will prescribe corrective action to be taken, target dates and enter his/her signature at the bottom of the form. Items which are not completed by the next inspection will be entered on subsequent reports until they are completed.
 - d. One copy of the report will be retained by the superintendent, one copy will be given to each inspecting foreman, one copy will be provided for the Plant Safety Committee and one copy will be mailed to Corporate for review by the Safety Director and management.
6. Deficiencies appearing on the inspection report may indicate the need for employee training and such training will be developed by the Plant Safety Committee.

MEDICAL AND FIRST AID

Each location, regardless of size, shall develop procedures for the care of sick or injured employees. The foreman/supervisor is responsible for administering first aid to employees. To be able to administer to sick or injured employees, foreman/supervisors should be trained in first aid procedures. All foreman/supervisors should acquaint themselves with first aid training.

A first aid program should include the following:

1. At least two properly trained and designated first aiders on every shift.
2. A first aid unit and supplies, or a first aid kit approved by a local doctor.
3. A first aid manual.
4. Posted instructions for calling a physician and also notifying the hospital or clinic that a patient is en route.
5. Posted method for transporting ill or injured employees and instructions for calling an ambulance or rescue squad.
6. An adequate first aid record system.

Prompt care of sick or injured employees is one of every supervisor's basic responsibilities.

Any injured employee will be accompanied by his/her foreman to the designated medical care facility and the foreman will remain with the employee to handle any problems.

In cases of minor emergencies our designated medical care facility is:

Concentra Medical Center
811 Cromwell Pk Dr. Suite 104
Glen Burnie, MD 21061
Phone 410-553-0110
Fax 410-533-0197

For serious injuries (broken bones, severe cuts) the employee should be transported to the local hospital:

Baltimore Washington Medical Center
301 Hospital Drive
Glen Burnie, MD 21061
Phone 410-787-4000

INCENTIVE PROGRAM

Incentive programs are used to promote and maintain safe work attitudes throughout the organization.

For any incentive programs the following must be followed:

1. Incentive programs should be based solely on safety and not tied into attendance, production or other measurements.
2. If possible, incentives should be based on team or group performance and not on an individual basis.
3. Incentives should be attainable, viewed as rewarding in value and timely in nature. The program should have time periods of smaller increments (monthly, quarterly) and should not have so many constraints that employees feel they will never will attain the reward.
4. Incentives should be based on accident free performance using OSHA guidelines for reportable and lost time accidents.
5. All accidents must be reported and failure to report an accident in order to obtain an incentive award will result in severe disciplinary measures.