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SOUTH OXFORD MANAGEMENT’S COMMITMENT TO SAFETY AND HEALTH

SOM is committed to providing a safe and healthy workplace for all of our employees and visitors. SOM has a reputation for professionalism, which has been earned by the dedicated efforts of all our employees. Part of that professionalism has been the adherence to our safe practices. We all recognize that safety is everyone’s responsibility.

The purpose of this manual is to provide all employees with a guideline for job safety at all of SOM. It is intended to help prevent accidents, which could result in injury and/or illness to all employees, the public and our customers. Our employees have been and always will be our greatest resource. SOM is dedicated to protecting its employees from injury or illness caused by unsafe acts. Also, SOM encourages and supports communications regarding safety and health matters between its employees and management at all levels.

This manual is designed to help SOM and its employees achieve the ultimate in job safety and proficiency. SOM firmly believes that there is no assignment so important and no deadline so crucial that we cannot take the time to do the job safely.

PROGRAM OVERVIEW – RESPONSIBILITY

Location Leadership

The Community Manager is responsible for the overall safety and health program at the property. This includes promoting safety throughout the property, ensuring employees conduct themselves in a safe manner and in accordance with program requirements, policies and guidelines, maintaining safe conditions and that, unsafe conditions are corrected.

In furtherance of these responsibilities, the Community Manager shall:

- Advise the Regional Manager and Risk Management of all location safety issues. Updates should occur at a minimum annually or more frequently if conditions warrant. This includes new safety programs, safety problems, property inspections and loss history.
- Coordinate overall safety and health program.
- Ensure compliance with all applicable OSHA safety and health standards.
- Implement and maintain the Emergency Action Plan for the property. (See Emergency Action Policy section).
- Ensure compliance with location specific regulatory requirements through program implementation and training.
- Coordinate accident investigation, resolve safety concerns and report serious injuries and illnesses in accordance with state and federal guidelines.
- Maintain relationships and communication with Risk Management and Regional Manager on safety programs and concerns.
Identify opportunities for improvement and/or recognition of improved injury and illness results as well as distribute loss information to the senior management team.

Assure management and employee training is completed on required safety programs.

Maintain required records, including meeting and training schedules and required regulatory information.

Maintain safety equipment and supplies.

Identify and abate safety and health hazards. Determine what, if any, personal protective equipment is necessary at the property.

Communicate safety initiatives and information to employees through bulletins, posters, newsletters and general discussions.

Seek new ways to improve safety program.

The Community Manager may delegate these duties to designated Directors from time to time as s/he may deem appropriate, but the Community Manager shall remain responsible for their proper completion in a timely manner.

**Employees**

Each employee is responsible for complying with the requirements of the location’s safety and health program. These requirements include:

- Working in a safe manner with other employees in an attempt to avoid and/or eliminate accidents.
- Reporting safety violations, unsafe conditions, and job-related injuries and accidents to supervisor or to the Community Manager or his/her designee.
- Attending required safety-training programs.
- Following the General Safe Work practices and abides by the property’s safety rules.
- Maintain their work areas in safe condition.

**Program Enforcement**

Enforcement of the safety and health program is critical if an effective program is to be achieved. For this reason, violations of any provision of this SOM safety and health program may subject the offending employee to discipline, up to and including termination.
General Safe Work Practices

Most workplace accidents are preventable if proper precautions and common sense are exercised. All employees play an essential role in maintaining the safety of their work environment. The following list establishes general safe conduct guidelines for all SOM employees, as well as any temporary employees occupying the property. The list is not intended to be all-inclusive.

- Do not attempt to operate equipment unless properly trained to do so.
- Use or possession of drugs or alcohol is strictly prohibited while working at or representing SOM.
- Use all required protective equipment.
- Use proper lifting techniques.
- Observe posted safety and warning signs.
- Do not remove guards, signs or any other safety devices unless you have been authorized and trained to do so.
- Respect other employees. Horseplay, fighting and practical jokes on fellow employees are prohibited.
- Smoking in unauthorized areas is prohibited.
- Keep emergency exits, aisles and fire equipment clear of obstructions.
- Possession of any type of weapon on the property is prohibited.

Emergency Action Policy

The best way to deal with emergency situations is to be prepared. By careful and thorough planning, SOM employees can minimize or prevent injuries as a result of emergency situations or disasters.

Each location should identify those emergencies, which are likely to arise. Employees must be aware of their roles and responsibilities in emergencies. The plan identifies probable emergencies, both general (such as a flood or severe weather) and property specific, and how to respond to them.

SOM’s emergency action plan defines:

- The method for alerting people onsite (and off-site as needed) to the emergency.
- The actions required of employees in the event of an emergency.
- The responsibilities of those involved in implementing the emergency response.
- The resources available (onsite and external) for responding to the emergency including providing for emergency assistance to injured or ill employees.
- Location of all emergency evacuation routes.
The Community Manager assists employees toward understanding their roles in an emergency situation and can make sure all employees are properly trained and prepared for emergencies. Members of the management team assist by helping assure the specific needs of the business facility will be addressed.

Where appropriate or necessary, SOM will coordinate its emergency response with local external emergency services.

**EMERGENCY ACTION PLAN**

**Responsibilities – In General**

All property management personnel as well as employees are responsible for compliance with the provisions of this Emergency Action Plan.

This plan is designed for major incidents where there is potential for several consequences to our company, risk of life, health and the environment, or property (ours and our neighbors). Examples of such incidents include, but are not limited to:

- Health disaster – pollution, epidemic, etc.
- Social emergencies – bomb threat, arson, riot, terrorism, hostage incident, etc.
- Technological disaster – hazardous materials accident, fire, explosion, dam failure, utility failure, etc.
- Natural disaster – earthquake, flood, windstorm, tornadoes, etc.

As with all situations in life, some assumptions were made during the development of this plan including the following:

- Employees recognize and will carry out their responsibilities in an emergency.
- All local first responders (police, fire, and other local authorities) will assume their roles during an emergency.

**Specific Responsibilities**

**Community Manager**

The Community Manager is ultimately responsible for the entire property; and, therefore, has final authority for its implementation. Some of the responsibilities associated with this authority include:

- Ensuring that resources are adequately allocated to management of emergency activities.
- Managing the business during emergency response.

Other duties include:

- Formulating, reviewing, and ensuring implementation of the emergency plan.
- Ensuring that all sections of the plan are kept current.
 Ensuring that all employees have reviewed this plan.
 Maintaining the SOM Outside Agency Contact Sheet (see page 6).

The Community Manager will be responsible for overseeing and directing all evacuation activities during major emergencies.
 Receiving the initial assessment of the incident and determining evacuation needs.
 Determining when a full evacuation is necessary, where applicable.
 Notifying emergency response agencies, as needed.
 Appointing personnel to assist with the emergency evacuation.

Once fire and police departments arrive at the scene, the local fire department’s on-scene commander will take over command of all emergency operations.

Public Information

All communications with the media and public officials shall be coordinated by the Risk Management and Regional Manager and such other management officials as may be appropriate.

During an emergency, access to the property will be denied to the press and public. Residents will also be asked to remain outside the property until the emergency is over.

 Press prints and other media output must be monitored to ensure that only factual information is being distributed. Incorrect or misinformation must be corrected as soon as possible.

Evacuation

The Community Manager will determine whether or not an evacuation is necessary for the property. If an evacuation is necessary, managers will give a signal by:

 Sounding an alarm or giving voice commands informing people of danger and order evacuation.

Upon notification of evacuation, all employees should exit the building affected. The Community Manager is responsible for supervising the evacuation.

If off-site evacuation is necessary, employees will be instructed to report to a designated location.

The Community Manager is responsible for conducting a headcount of employees following an evacuation.

The Community Manager will notify the incident commander of any employees that are unaccounted for.
Coordination with Government/Private Agencies

The extent of outside involvement in a property emergency will depend on the magnitude of the emergency and its impact on life, environment, and company property.

Outside Agencies
To be utilized or contacted in the event of a major emergency.

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<thead>
<tr>
<th>Agency</th>
<th>Contact Information</th>
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<tr>
<td>Fire Department</td>
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<td>Hospital Emergency</td>
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<td>Poison Control Center</td>
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<td>Police</td>
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<td>Gas Company</td>
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<td>Electric Company</td>
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<td>Water Company</td>
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<td>Red Cross</td>
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<tr>
<td>Regional Manager</td>
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<td>Director of Operations</td>
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</table>
SPECIFIC EMERGENCY SITUATIONS

Fire Safety Procedures
The following procedure should be followed in the event of fire in the building:

- Call 911. Give the location of the property.
- Alert the Community Manager/Regional Manager/Risk Management.
- Begin evacuation procedures immediately and inform your manager.
- Leave via the nearest exit.
- Meet at the evacuation site.
- The manager should immediately take a head count to ensure everyone is accounted.
- Do not return to the building until emergency personnel (police or fire department), or the acting fire marshal, gives the “all clear” notification.

NATURAL HAZARDS

Hurricanes
Please refer to Hurricane Response Plan.

Tornadoes/High Winds
If a tornado watch is issued by the National Weather Service, personnel should be assigned to monitor weather conditions and report to the manager(s).

In the event of an imminent tornado touchdown, personnel will be informed by the public address system or oral announcements. Personnel are to seek shelter.

Floods
When warnings of flood are issued, all attempts will be made to protect company personnel and tenants, as well as equipment and supplies.

OSHA inspections

The Occupational Safety and Health Administration (OSHA) within the US Department of Labor was created in 1970. OSHA’s responsibilities are to enact standards to address safety and health hazards to employees, inspect worksites to ensure compliance with those standards and to cite employers that violate the safety and health standards. Some states have chosen to create a state OSHA, known as state plans and these state plans are required to adopt standards at least as strict as the federal standards.
In the event an OSHA inspection occurs at your location, notify the Regional Manager first. The Regional Manager is responsible for then contacting the Risk Management and Regional Manager immediately.

**What to Expect During an OSHA Compliance Visit**

- The OSHA compliance officer will request to see the “person in charge” at the location.
- Upon notice that OSHA is on-site, contact your Regional Manager immediately.
- SOM representative should ask for and review the OSHA official’s credentials.
- The OSHA compliance officer will request to hold an opening conference. At that time, inquire the reason for the visit. This will define the scope and reason for the visit. Most common reasons for the visit are employee complaint, target industry, or nature and severity of a workplace injury.
- Stay with the officer at all times; take notes on items discussed.
- To the extent possible, correct any identified violations immediately.
- Provide any additional information relevant to and supportive of your company’s position.
- Ask the OSHA officer for a receipt acknowledging any documents that you provided.
- Take notes on any problems identified by the officer and note any abatement procedures suggested.
- Provide the compliance officer with records that are relevant to the scope of the inspection as well as the following specific records.
  - Copies of specific written safety and health programs. **NOTE:** OSHA compliance officers may review records but not take copies without authorization from the Risk Management and Regional Manager. Such records may include OSHA 300 logs, 300A summary forms, copies of the safety program, etc.
- If the compliance officer requires a visit to a specific area because of an employee complaint, escort him/her using the route providing the least access to other operating hazards. The compliance officer can issue citations on anything seen from the point he/she enters the property until he/she leaves.
- During the inspection the OSHA compliance officer may, and probably will, want to interview employees. Employees can refuse; however, management cannot refuse access to employees or on behalf of them. The compliance officer may request an employee representative to join the inspection. Any interviews of management officials by the compliance officer will be with SOM attorney or senior management official present.
- Two members of management must accompany the compliance officer on the inspection – one to answer questions and one to take notes and photos (if the compliance officer takes photos). Have a maintenance person available to immediately make any necessary repairs and make sure the compliance officer notes in the report the repairs were completed.
- Do not ask the compliance officer to come back a different day because the unannounced visit is not convenient for you to meet with them. He or she will indeed come back most likely with a search warrant, and will likely conduct a “wall-to-wall” inspection. It is appropriate to request that any monitoring be postponed until SOM has the opportunity to get the appropriate personnel also to conduct monitoring at the same time. However, this must be done reasonably quickly.
Never argue with the compliance officer and do not allow managers or employees to argue with the compliance officer.

Do not volunteer information to the compliance officer. Answer only the questions asked.

Never leave the compliance officer unaccompanied during the inspection, except for the private interviews with non-management employees. Sometimes, a compliance officer will permit a management official to be present even where non-management employees are interviewed.

Take requested documents to the compliance officer, rather than taking the compliance officer to the file cabinet and giving further access.

Avoid making any statements which could be taken as an admission of violating any laws or regulations, or might be interpreted mistakenly as management’s long-standing knowledge of an apparent safety hazard.

At the end of the inspection, a closing conference will be held. The following items will be discussed:

- Possible violations
- Recommended methods of compliance
- Specific citations and/or fines will not be discussed.

**OSHA Correspondence and Citations**

If a citation is received, immediately contact your Regional Manager. In addition, copies of the citation should be sent to the Risk Management and Regional Manager as soon as it is received. Once the citation is reviewed, it must be posted in a location for all affected employees to see until the issue is resolved. The penalty amounts in the citation are not required by Federal OSHA to be posted and should be blocked out prior to posting of the citations. A number of states have their own state OSHA plans. These state plans generally have standards similar to federal OSHA’s (some rules are more restrictive). However, their procedural requirements may vary. If you are unsure whether your facility is in a state with different posting requirements, contact the RO/Risk Management and Regional Manager for instructions. The period for posting will be on the citation. Send a copy of the citation to the

Citations may be settled or contested. Contact the Risk Management and Regional Manager to discuss this process.

Copies of any other correspondence from OSHA should be sent to and discussed with the Risk Management and Regional Manager as soon as it is received.
When You Are Required to Call OSHA

OSHA must be contacted within eight (8) hours of the death of an employee due to a work-related incident.

OSHA must be contacted within 24 hours of one of the following work-related incidences:

- In-patient hospitalization of one or more employee
- Amputation
- Loss of an eye

For those properties in Virginia, in cases of in-patient hospitalization of three or more employees, OSHA must be notified within eight (8) hours.

CONTACT THE RISK MANAGEMENT AND REGIONAL MANAGER IMMEDIATELY (AND PRIOR TO CONTACTING OSHA) IF ANY OF THE ABOVE OCCURS.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

It is the policy of SOM to provide adequate protection to its employees by using Personal Protective Equipment (PPE) as needed. SOM shall supply the PPE (except footwear) at no cost to employees. SOM shall perform a hazard assessment, provide training, and maintain records regarding the personal protection program. All employees shall wear PPE as required. Failure to wear PPE can result in disciplinary action, including the termination of employment.

Objective

The purpose of this Personal Protective Equipment (PPE) Program is to prevent exposure to workplace hazards, document hazard assessments, put corrective measures in place, and implement the use of PPE at SOM. PPE devices are not to be relied on as the only means to provide protection against hazards. The best approach is to abate the hazard first through engineering controls (change in process, elimination of process, chemical substitution, etc.), with PPE to provide protection against hazards which cannot reasonably be abated otherwise. PPE should be used in conjunction with guards, engineering controls, and sound practices.

Responsibility

Each of the property shall be responsible for:

- PPE training.
- Considering and implementing engineering controls for recognized hazards.
- Being knowledgeable of the PPE program requirements and advising departments on proper use of PPE.
Hazard Assessment

Supervisors will conduct a walk-through survey of each work area to identify potential hazards. Each survey will be documented using the Hazard Assessment Form. Hazard assessment should be dated and signed as the written certification and maintained for inspection and training with the department. A copy should also be sent to Risk Management.

Protective Devices

All PPE will be appropriate for the work to be performed and maintained in a clean condition. Equipment must meet American National Standards Institute (ANSI) standards. Gloves must be selected based on style, size and performance characteristics of the glove in relation to the hazards encountered. (Note: currently there is no ANSI standard for hand protection).

Training

Any employee who will be using PPE will be trained by their supervisor on the following:

- Which PPE is necessary
- When PPE is necessary
- How to properly adjust and wear their PPE
- The limitations of the PPE
- The proper disposal of the PPE

Training will be provided prior to the employee working in an area requiring the use of PPE. Additional training is needed when:

- Changes in the employee’s job duties require different PPE.
- Changes in the style or type of PPE used renders the previous training obsolete.
- An event has occurred which indicates the affected employee has not retained the training on the proper use of the PPE.
- The employee is observed incorrectly using the assigned PPE.

Employees and immediate supervisors must demonstrate an understanding of the training and the ability to use PPE properly before they are allowed to perform work requiring the use of the equipment.

If there is reason to believe an employee or immediate supervisor does not have the understanding or skill required, they must be retrained. Retraining may be required when there are changes in the workplace, or changes in the types of PPE to be used, which would render previous training obsolete. Inadequacies in an employee’s or immediate supervisor’s knowledge in the use of the assigned PPE, or selection of PPE, would also require retraining.
Cleaning and Maintenance

It is important that all PPE be kept clean and properly maintained by the employee assigned to use the equipment. Cleaning is particularly important for eye and face protection. Dirty or fogged lenses could impair vision. PPE is to be inspected, cleaned and maintained by employees at regular intervals and as stated in the manufacturer’s instructions.

If an article of PPE is in need of repair or replacement, it is the responsibility of the employee to bring it to the immediate attention of his/her supervisor. Do not use PPE if it is in need of repair or if it is not able to perform its intended function.
# PPE Hazard Assessment Sample

<table>
<thead>
<tr>
<th>Dept.: Sample</th>
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<tr>
<th>HAZARDS (Highlight Hazards)</th>
<th>Describe Specific Hazards</th>
<th>Identify Type of PPE Required for the Hazards</th>
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<tbody>
<tr>
<td><strong>Eye Hazard</strong></td>
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<td>Impact</td>
<td>Penetration</td>
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<td>Dust</td>
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<td>Chemical/Bio</td>
<td>Radiation</td>
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<td>Heat</td>
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<th>Describe Specific Hazards</th>
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<tr>
<td>Impact</td>
<td>Penetration</td>
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<td>Chemical</td>
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<tr>
<td>Impact</td>
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<tr>
<td>Chemical/Biological</td>
<td>Sharp Objects (puncture risk)</td>
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<td>Wet Conditions</td>
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<td>Electric Shock</td>
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<tr>
<td>Impact</td>
<td>Penetration</td>
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<tr>
<td>Chemical/Biological</td>
<td>Sharp Edges</td>
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<th>Describe Specific Hazards</th>
<th>PPE Required</th>
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<tr>
<td>Falls</td>
<td>Guarding</td>
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<td>Electrical</td>
<td>Storage</td>
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<td>Lockout</td>
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<tr>
<td>Respiratory</td>
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**Signature:**

**Date:**
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<td>Penetration</td>
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<tr>
<td>Impact</td>
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<td>1. Flying objects</td>
<td>1. Goggles, safety glasses or face shield</td>
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<td>Dust</td>
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<td>2. Dirt, dust, branches, etc.</td>
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<tr>
<td>Chemical/Bio</td>
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<td>3. Chemicals or blood borne pathogens</td>
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<td>Heat</td>
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<td><strong>Head Hazard</strong></td>
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<td>1. Closed toe shoes</td>
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<td>Sharp Objects (puncture risk)</td>
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<tr>
<td>Chemical</td>
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<td>Wet Conditions</td>
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<tr>
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<td>Burn</td>
<td>Electric Shock</td>
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<td>Penetration</td>
<td>2. Latex or similar chemical resistant gloves</td>
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<td>Chemical/ Biological</td>
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<td>Sharp Edges</td>
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<td>Describe Specific Hazards</td>
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<td>Guarding</td>
<td>1. Leaf blower or other equipment noise</td>
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<td>Lockout</td>
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<td>Respiratory</td>
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<td>Signature:</td>
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<tr>
<td>Dept.: Housekeeping</td>
<td>HAZARDS (Highlight Hazards)</td>
<td>Describe Specific Hazards</td>
<td>Identify Type of PPE Required for the Hazards</td>
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<tr>
<td>Head Hazard</td>
<td>Burn Electric Shock Impact Penetration Chemical Overhead Overhead loads</td>
<td>Describe Specific Hazards</td>
<td>PPE Required</td>
<td></td>
</tr>
<tr>
<td>Foot Hazard</td>
<td>Chemical Impact Electrical Sharp Objects (puncture risk) Wet Conditions</td>
<td>Describe Specific Hazards</td>
<td>PPE Required</td>
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</tr>
<tr>
<td>Hand Hazard</td>
<td>Burn Electric Shock Impact Penetration Chemical/Biological Sharp Edges</td>
<td>Describe Specific Hazards</td>
<td>PPE Required</td>
<td></td>
</tr>
<tr>
<td>Other Safety/Health Hazards</td>
<td>Falls Guarding Electrical Storage Lockout Noise Respiratory Clothing</td>
<td>Describe Specific Hazards</td>
<td>PPE Required</td>
<td></td>
</tr>
</tbody>
</table>

Signature: ____________________________  Date: ____________________________

1. Nails, sharp objects
2. Impact of objects under 40 lb.
1. Closed toe shoes
1. Handling trash bags
2. Spray cleaner
1. Work gloves
2. Latex or similar glove
1. Goggles, safety glasses or face shield
1. Goggles, safety glasses or face shield
<table>
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<tr>
<th>Dept.: Maintenance</th>
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<tbody>
<tr>
<td><strong>HAZARDS (Circle Hazards)</strong></td>
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<td>Eye Hazard</td>
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<tr>
<td>Head Hazard</td>
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<tr>
<td>Foot Hazard</td>
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<tr>
<td>Hand Hazard</td>
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<tr>
<td>Other Safety/Health Hazards</td>
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<td><strong>Signature:</strong></td>
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<tr>
<td><strong>Date:</strong></td>
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BLOODBORNE PATHOGEN PROGRAM

Program Administration

SOM has developed the Exposure Control Plan in an effort to ensure the health and safety of employees that may be exposed to communicable diseases during the course and scope of their employment with this company.

This Bloodborne Pathogen Exposure Control Program applies to any employee that is occupationally exposed* to blood or other potentially infectious biological material during the performance of their job duties.

The manager is responsible for administration and implementation of this program.

The program elements are as follows:

- Exposure Determination
- Engineering and Work Practice Controls
- Personal Protective Equipment
- Housekeeping
- Vaccination and Post-Exposure Evaluation
- Communication of Hazards
- Training
- Recordkeeping

*Occupational exposure means reasonable anticipated skin, eye, mucous membrane, or parenteral contact with blood or other potentially infectious materials that may result from the performance of the employee’s duties.

Employee Exposure Determination

Employees through completion of their normal job duties and responsibilities are not subject to exposure to blood borne pathogens. However, minor accidents such as skin abrasions could present the possibility of contact with contaminated surfaces, tools or materials.

Engineering and Work Practice Controls

The following engineering controls and work practices have been implemented to minimize or eliminate employee exposure to potentially infectious biological material. All employees covered or affected by this program must comply with these requirements.
All personnel performing duties covered in or relating to this program will observe universal precautions when the potential exists for exposure to potentially infectious biological material. All such materials will be treated as if known to be infectious and capable of transmitting disease.

**Engineering and Work Practice Controls Continued**

- Employees are required to wash their hands with soap and water as soon as possible upon any accidental contact with any body fluids or potentially infectious biological material. Employees are also required to wash any part of their body that has or is suspected of having come in contact with potentially infectious biological material with soap and water. This includes flushing the eyes with water, if applicable. There are hand washing facilities and eye wash stations at various areas within the property.

- Employees are not required to provide first aid or medical treatment or services as part of their duties. Should any employees, who are trained in such services, choose to provide such services, they do so at their own discretion or choosing and are not required to do so by SOM. These employees are, however, expected to use proper precautions as mandated by their training.

**Personal Protective Equipment**

The following personal protective equipment is provided to reduce the likelihood of employee exposure to potentially infectious biological material:

- Gloves will be worn at any time the potential exists or during the clean-up phase of operations where the potential for contamination exists.

- Those employees assigned the task of clean-up after a sewer/toilet overflow, will wear the necessary personal protective equipment to protect themselves from possible exposure to contaminants.

**Housekeeping**

All contaminated equipment and surfaces will be thoroughly cleaned and disinfected as soon as possible following contact with potentially infectious biological material. Contaminated areas will be restricted until clean-up efforts are completed.

Cleaning procedures will be performed in a manner that offers maximum protection to those involved in the process. Engineering or mechanical means will be utilized as opposed to actual contact during cleaning procedures. Gloves and other appropriate personal protective equipment shall be utilized during cleaning procedures. Contaminated waste will be placed in appropriate leak-proof containers for disposal. All contaminated waste will be disposed of immediately.

**Vaccination and Post-Exposure Evaluation**

All applicable employees should be offered the hepatitis B vaccine under the following scenarios:
1. At time of hire.
2. Immediately following any incident where there is likelihood that an employee has been exposed to potentially infectious biological material to the point of cross-contamination or body fluid exchange.

Employees should be offered the vaccination at no cost. Any employee may decline the vaccination by signing the declination form. An employee that declines the vaccination may request it at any time thereafter and it will be made available again, at no cost to the employee.

Following a report of a cross contamination exposure, the exposed employee will receive a confidential medical evaluation from the treating physician and follow up including at least the following:

- Documentation of the routes of exposure and the circumstances under which the exposure occurred.
- Identification and documentation, including collection and testing of blood for serological status of the source individual, unless infeasible or prohibited by state law or local ordinance.
- Collection and testing of blood of exposed employee for serological status.
- Recommended medical treatment.
- Counseling, if medically necessary.

**Evaluation of Any Related Illness**

The evaluating health care professional will be provided, by others, with the following information:

- A description of the exposed employee’s duties as related to the incident.
- Documentation of the routes of exposure and circumstances under which the exposure occurred.
- Results of blood testing from source individual, if available.
- All relevant medical records and information concerning the status of vaccination.

SOM will obtain and provide the employee with a copy of the evaluating healthcare professional’s written opinion within 15 days of the completion of the evaluation. All other findings and information shall remain confidential between the health care provider and the exposed employee and will not be included in any report SOM.

All required and recommended medical evaluation procedures will be made available at no cost to the employee.
HEPATITIS B VACCINATION ACKNOWLEDGEMENT

I understand that due to a particular incident of my occupational exposure to blood or other potentially infectious biological material, I may be at risk of acquiring the Hepatitis B virus. I have been given the opportunity to be vaccinated with the Hepatitis B Vaccine at no charge to myself.

The Hepatitis B Vaccine Series is to be offered to all employees in the maintenance department. This includes: Service Director, maintenance technician, groundskeeper, housekeeper, etc.

Any other position where an employee may be potentially exposed to blood should be offered this series of vaccines as well.

This form is to be signed at the time of hiring by all employees in the maintenance department and any other position that has the potential exposure to blood.

Consenting to the Hepatitis B Vaccine Series
I have read and I understand the above information and wish to receive the Hepatitis B Vaccine series. Also, I have no known sensitivity to yeast.

__________________________  ____________________________  _________________
Signature                  Printed Name         Date

Declining the Hepatitis B Vaccine Series
I have read and I understand the above information and decline to receive the Hepatitis B Vaccine series offer at this time. I understand that by declining this vaccination, I continue to be at risk of developing the hepatitis B virus. If, in the future, I choose to request this vaccination, it will be offered to me at no charge.

__________________________  ____________________________  _________________
Signature                  Printed Name         Date

Position                  Property
Communication of Hazards
All contaminated waste generated by this company will be disposed of immediately. Any potentially infectious biological material generated and contained in quantities that would require handling as a regulated waste will be placed in leak-proof containers and labeled or identified accordingly with the words “BIOHAZARD” on all internal and external primary containers.

Training Program for Exposure Control
All employees identified as having potential exposure to potentially infectious biological material will participate in a comprehensive training program prior to initial assignment to tasks where exposure is likely. The training program will include at least the following elements:

- Explanation of epidemiology and symptoms of covered diseases.
- Explanation of modes of transmission of covered diseases.
- Explanation of the exposure control plan and identification or responsible parties.
- Explanation of methods for recognizing tasks and activities that may involve exposure to potentially infectious biological material.
- Explanation of the end use and limitations of methods utilized to reduce the likelihood of employee exposure to potentially infectious biological material.
- Information about the basis for selection and the types, use, requirements, and limitations of personal protective equipment provided by the employer.
- Information about the offering of the hepatitis B vaccination upon exposure.
- Reporting requirements.
- Explanation of the procedures that will follow an exposure incident.
- Explanation of labeling used at the facility.

This required training will be administered prior to initial assignment and be repeated annually for all employees that are determined to be exposed to potentially infectious biological material during the scope and application of their job duties.

Recordkeeping for Exposure Incidents
SOM, in their Human Resources Department, will establish and maintain an accurate medical record for each employee that experiences an exposure incident. SOM will also establish training records to ensure training requirements are met. All medical and training records will be made available to the subject employee or their representative upon written request.
HAZARD COMMUNICATION

Purpose

This Hazard Communication Program is intended to ensure compliance with Occupational Health and Safety Administration (OSHA) requirements for the adoption of the UN Globally Harmonized System (Hazcom 2012/GHS). The purpose of this Hazard Communication Program (HCP) is to ensure that the hazards associated with the chemicals used at SOM are evaluated, and communicated to all Associates.

Definitions

- **Common Name** – a designation or identification such as code name, code number, trade name, brand name or generic name used to identify a chemical other than by its chemical name.
- **Designated Representative** – any individual or organization to whom an employee gives written authorization to exercise such employee's rights under this section.
- **Hazard Class** – the nature of the physical or health hazards, e.g., flammable solid, carcinogen, oral acute toxicity. This is determined by the Chemical Manufacturer.
- **Hazardous Chemical** – any chemical that is a physical hazard or a health hazard, simple asphyxiate, combustible dust, pyrophoric gas, or hazard not otherwise classified.
- **Hazard Warning** – any words, pictures, symbols, or combination thereof appearing on a label or other appropriate form of warning, which convey the specific physical and health hazard(s), including target organ effects, of the chemical(s) in the container(s).
- **Health Hazard** – a chemical hazard where there is statistically significant evidence based on at least one study conducted in accordance with established scientific principles that acute or chronic health effects may occur in exposed Associates. The term “health hazard” includes chemicals which are carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, hepatotoxins, nephrotoxins, neurotoxins, agents which act on the hematopoietic system and agents which damage the lungs, skin, eyes, or mucous membranes.
- **Label** – an appropriate group of written, printed or graphic information elements concerning a hazardous chemical that is affixed to, printed on, or attached to the container of a hazardous chemical, or to the outside packaging. Manufacturer’s labels are not to be removed, defaced, covered or otherwise eliminated from any manufacturer’s container.
- **SDS – Safety Data Sheet** – means written or printed material (in English) concerning a hazardous chemical that follows the specifics as indicated within the OSHA Hazard Communication standard.
- **Physical Hazard** – a chemical for which there is scientifically valid evidence that it is a combustible liquid, a compressed gas, explosive, flammable, an organic peroxide, an oxidizer, pyrophoric, unstable (reactive) or water-reactive.
Policy

SOM is committed to providing a safe and healthy workplace for all staff. We have adopted this program to prevent illness and injury produced by exposure to liquids, solids, gas vapors, fumes and mists and to comply with OSHA Hazard Communication Standard, 29 CFR 1910.1200 as detailed in Hazcom 2012/GHS regulations.

This document is essential to SOM in implementing and complying with the Standard and addressing our:

- Use of labels, placards, posters and other forms of warning,
- Use of Safety Data Sheets (SDSs),
- Hazardous chemical inventory,
- Communication of hazards by SDSs and labels,
- Training of employees and independent contractors,
- Procedure for non-routine tasks,
- Communications with other employers concerning hazardous materials used on our site,
- Recordkeeping

Responsibilities

- The Community Managers are responsible for the implementation of this program and its review, maintenance and updating as necessary.
- Associates are responsible for the following:
  - Completing the required training.
  - Knowing which chemicals in the work area are hazardous.
  - Verifying that all incoming containers of potentially hazardous chemicals are properly labeled as well as any secondary use containers in the facility.
  - Becoming familiar with the information on the SDS for chemicals in their work area.
  - Informing their supervisor when encountering hazardous chemicals in the work area which are not properly labeled or do not have an SDS on file.
  - Informing their supervisor when new potentially hazardous chemicals arrive or when discontinuing the use of current hazardous chemicals.

Container Labeling

Primary Containers: Designated supervisors will ensure all containers of hazardous materials received for use are clearly labeled according to the regulated requirements of Hazcom 2012 (GHS). This includes the name of the material (trade name or chemical name), hazard pictogram(s), signal word, hazard statements, precautionary statements, and the manufacturer or distributors name address and emergency contact information.

Secondary Containers: When the contents of large containers are broken down into smaller or secondary containers for in-house use (such as spray bottles). SOM will ensure that the label shows the chemical identity and appropriate warnings as required by OSHA. The supervisors in each work area will ensure that all secondary containers are properly labeled.

Portable Containers: Portable containers are those in which an employee or independent contractor transfers chemicals from a labeled container to a portable one solely for immediate
use. Designated supervisors will ensure all containers of hazardous chemicals are clearly labeled with the identity and appropriate hazard warnings.

Designated supervisors will post placards, signs and other written or illustrated materials displaying the same information as labels on stationary containers and processes. Employees and independent contractors shall have the opportunity to review these signs and placards at any time during their shift, by contacting their immediate supervisor.

The Service Director will review labeling procedures from time to time and update as necessary.

**Safety Data Sheets (SDSs):** The Service Director will establish an SDS program to collect, manage, monitor and update SDSs and the SDSs library as required. No container will be released for use until the SDS is received and the information verified.

The Service Director who purchases chemicals will be responsible for obtaining all SDSs for hazardous materials used or shipped by employees or contractors. Designated supervisors are thereafter charged with informing employees and independent contractors of any new information, prior to their exposure.

Employees will contact the Service Director if an SDS has not been supplied with an initial shipment. The Service Director will then contact the chemical manufacturer or distributor to obtain the necessary information. A copy of the letter or e-mail to the manufacturer is to be kept on file. If the request is made by phone, details of the call must be logged.

Service Directors will ensure that the SDSs are conveniently located close to the work area where the hazardous materials are used. If it is a large community, one SDS book will be kept in the Maintenance Shop and one will be Maintained in the Leasing office. Duplicate SDS sheets pertaining to pool chemicals will be kept in a binder by the pool, where the pool chemicals are stored.

**Hazardous Chemical Inventory:** The Service Director is responsible for compiling, maintaining and updating a list of all known hazardous materials used on site by employees or independent contractors. The inventory shall be kept at each work location with the SDSs.

SOM employees and independent contractors shall be allowed to review the inventory and obtain information from the SDS at any time during their work shift. Supervisors shall be responsible to ensure the inventory is available at all times. If an employee or consultant notices that an SDS is not available, they are to immediately notify their Supervisor. A sample, blank hazardous chemical inventory is included in Appendix A.

When new chemicals are received, the Service Director will update the inventory as required, including the date when the chemical was introduced. Supervisors will ensure that separate lists of hazardous chemicals used at each location are maintained and posted in individual work areas.
**Employee Training**

**Employee Safety Orientation:** Before commencing any work at SOM the Service Director will make sure all new hires receive a safety orientation appropriate for the nature of their work.

For all SOM staff, the minimum safety orientation will include:

- An overview of the Corporate Safety Policy
- A detailed review of the emergency response action plan
- A detailed review of hazardous chemicals used onsite

Records must be kept of all orientations. Employees conducting orientations must request the certification of training from new hires.

**Employee Training – Hazardous Chemicals:** SOM will provide or will arrange to provide by competent and qualified people, training to all employees who are exposed or may be exposed to hazardous chemicals. Retraining will also be provided when a new hazard is introduced into the workplace or new hazard information becomes available for chemicals already in use onsite. Supervisors will receive special training on chemical hazards and protective measures so they can monitor staff and provide appropriate safety advice. As a minimum such training will include:

- An overview of the Hazard Communication Standard,
- An overview of the hazard communication program at SOM and the location of the written program,
- A description of the physical risks of chemicals used,
- A description of the health risks, including the signs and symptoms of exposure and any medical conditions that might be aggravated by exposure,
- Procedures to follow if overexposure is suspected,
- Information on how to detect the presence of a hazardous chemical release such as the odor or visual appearance, a description of the emergency procedures,
- Steps SOM has taken to eliminate or reduce exposure,
- A description of the emergency procedures,
- A description of protective measures against chemical exposure such as control or work practices and the use and maintenance of PPE,
- A description of the procedures and equipment to be used when cleaning hazardous spills and leaks,
- Details of where to find the SDS files, the order of information in a Hazcom/GHS compliant SDS, and how to read and interpret the information,
- Details of how to read and interpret information on Hazcom 2012/GHS labels,
- Details on the location of written hazard evaluation procedures, this written program, and the hazardous chemical inventory.
The Service Director will make all training materials available to all employees and independent contractors, and will ensure each employee signs a form to verify attendance and receipt of training materials.

**New Task Instruction:** Service Directors will ensure that all staff performing a critical task for the first time receives instruction by a competent person prior to commencing the work. This instruction must include the use and care of any safety equipment and PPE. New employees and contractors will be observed on all critical tasks when performing them on their own for the first time following instruction.

**Hazardous Non-Routine Tasks:** SOM will provide, or will arrange to provide by qualified persons, special training to all employees before they start work on non-routine tasks. At a minimum such training will include:

- The hazardous chemicals that may be present in such work
- Details of the safety precautions to be taken
- Details of the measures SOM is taking to reduce or eliminate the hazards
- Details of emergency procedures

**Informing Independent Contractors of Hazardous Chemicals Used Onsite:** If contractors will be exposed to hazardous chemicals due our work, we will make SDS available.

**Recordkeeping:** SOM will maintain its hazardous chemicals inventory for chemicals used at the Facility for at least 30 years. During ownership, when selling a location, the SDS remains onsite. Such list will be maintained in accordance with 29 CFR 1910.1020 “Access to Employee Exposure and Medical Records.”

Records will also be kept of employee safety orientations and hazardous chemical training. Any retraining will also be recorded by the Service Director.

**Program Availability:** Employees of SOM and their representatives and independent contractors can obtain copies of this program upon request from their immediate supervisor at any time.

**Program Review:** This document will be reviewed as dictated by changes to the applicable laws, standards and/or codes. This document will also be reviewed to address Associate concerns as they apply or arise.
Sample – Hazardous Chemical Inventory

(Most communities have a table of contents in their SDS which would replace this form.)

<table>
<thead>
<tr>
<th>Hazardous Chemical Name</th>
<th>Manufacturer’s Name, Address and Telephone Number</th>
<th>Operations/Area Where Used</th>
<th>Date Brought to Site/ Date Removed from Site</th>
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In accordance with 29 CFR.1200.1020 (d) (ii) (B), this form shall be retained for 30 years after the chemical has left the premises.
FIRST AID POLICY

All locations are required to maintain a fully stocked first aid kit on at their community which is easily accessible during normal business hours.

It is SOM policy that in the event of a medical emergency involving an employee, resident or guest, 911 will be called immediately to provide emergency medical services.

NO SMOKING POLICY

General

In its continuing effort to ensure that all employees have a safe and healthful workplace, SOM has instituted this No Smoking Policy for all indoor work areas. SOM does not permit any employee or non-employee to smoke tobacco products in an enclosed space at the work site, except for those specific areas designated for smoking where the law permits and SOM has decided to permit it.

Designated Smoking Areas

Smoking generally is prohibited in all enclosed workplaces and in immediate vicinity of such workplaces (except private residences). Smoking break rooms are prohibited, even where they are separately vented. No smoking signs shall be prominently posted in all affected locations. Where permitted by law, the Community Manager may designate areas where smoking will be permitted. Smoking will not be permitted in any work areas. A break room may be designated for smoking provided that the air from the smoking room is exhausted directly to the outside by an exhaust fan and air from the smoking room is not recirculated to other parts of the building. Also, the smoking room will be located in a non-work area where no employee, as part of his or her work responsibilities, is required to enter except that custodial or maintenance work can be carried out when the break room is unoccupied. In addition, the Community Manager will ensure that there are sufficient nonsmoking break rooms to accommodate nonsmokers. Where the above requirements cannot be achieved, smoking will only be permitted outdoors in designated areas.

*This policy is required at properties in Illinois, Massachusetts, New York, California and Maryland.

LOCKOUT/TAGOUT*

Lockout/Tagout Program

The Lockout/Tagout program establishes procedures for compliance with OSHA’s Mechanical and Electrical Lockout and Tagout program requirements (29 CFR 1910.147 and 29 CFR 1910.333). These procedures are designed to protect employees from the hazards and subsequent injuries that occur as the result of the unexpected release of a hazardous energy source during the performance of maintenance operations. Specific procedures have been developed for each separate piece of equipment. The responsibility for implementing the program rests with the Community Manager.
Definitions Pertaining to Lockout/Tagout

An **authorized employee** is one who locks or tags out machines or equipment in order to perform servicing or maintenance on that machine or equipment. An affected employee can also become an authorized employee if his or her duties include servicing and maintenance along with the operation of the machine or equipment.

An **affected employee** is one whose job requires him/her to operate or use a machine or piece of equipment on which servicing or maintenance is being performed under the lockout/tagout program or whose job requires him/her to work in an area where such servicing or maintenance is being performed.

Another **employee** is one who under normal conditions is not identified in the qualified, authorized, or affected categories.

A **qualified employee** is one who has been trained to avoid the electrical hazards of working on or near exposed energized parts. It is possible for an employee to be considered qualified with regard to certain equipment in the workplace, but unqualified as to other equipment. An employee who is undergoing on-the-job training and who, in the course of such training, has demonstrated an ability to perform duties safely at his or her level of training and who is under the direct supervision of a qualified employee is considered qualified for the performance of those duties.

*Note:* This policy does not apply to work on cord and plug connected electric equipment for which exposure to the hazards of unexpected energization in startup of the equipment is controlled by the unplugging of the equipment from the energy source and the plug under the exclusive control of the employee performing the maintenance.

Training for Lockout/Tagout

Training records will be maintained with this program at the community.

**Training for Authorized Employees**

Will include all aspects of this program, the identity of common energy sources, a review of isolating and lockout/tagout devices, and all specific procedures for each individual machine or equipment in the program will be the responsibility of the Community Manager.

**Training for Affected Employees**

Will include the purpose of the program, how to recognize a Lockout/Tagout operation and how it will affect them.

**Training for Other Employees**

Will include notification that this program exists and to stay clear of any Lockout/Tagout operation in progress.

**Training for Qualified Employees**
Will include the same training as for the authorized employee, in addition to the following:

- The skills and techniques necessary to distinguish exposed parts from other parts of equipment.
- The skills and techniques necessary to determine the nominal voltage of exposed live parts.
- The capability to work safely on energized circuits.
- Familiarity with the proper use of precautionary techniques and personal protective equipment.
- How to use insulating and shielding materials and insulated tools.
- Proper use of test equipment.
- How to test circuit elements and electrical parts of equipment to which employees may be exposed.
- How to verify that circuit elements are de-energized.
- How to check if the test equipment is properly working before and after each operation.
- How to determine if any energized condition exists and if it exists as a result of inadvertently induced voltage or unrelated voltage feedback even though specific parts of the circuit have been de-energized.

**Sequence of the Lockout/Tagout Process**

1. **Preparation for Shutdown** – Before authorized, qualified, or affected employees turn off a machine or equipment that is to be maintained or serviced, they will have knowledge of the type and magnitude of the energy, the hazards of the energy to be controlled, and the means to control that energy. An assessment will be made to determine all energy sources associated with the specific piece of equipment or machinery. The Lockout Equipment List identifies the specific methods to be used for isolating the energy sources. These methods will be followed by the authorized or qualified employee performing the servicing or maintenance operation.

2. **Machine or Equipment Shutdown** – The machine or equipment will be turned off or shut down using the specific procedures. An orderly shutdown will be followed to avoid any additional or increased hazards to employees as the result of equipment de-energization.

3. **Machine or Equipment Isolation** – All energy control devices that are needed to control the energy to the machine or equipment will be physically located and operated in such a manner as to isolate the machine or equipment from the energy source.

4. **Lockout or Tagout Application** – Lockout or tagout devices will be affixed to the energy isolation device(s) by authorized or qualified employees. The lockout devices will be affixed in a manner that will hold the energy isolation device in a “safe” or “off” position. Where tagout devices are used they will be affixed in a manner that will clearly state that the operation of the equipment or the movement of energy isolation devices from the “safe” or “off” position is prohibited. The tagout devices will be
attached to the same point a lock would be attached. If the tag cannot be affixed at that point, it will be located as close as possible to the energy isolation device and in a position that will be immediately obvious to anyone attempting to operate the device.

5. **Stored Energy** – All residual energy will be relieved, disconnected, restrained, and otherwise rendered safe prior to the application of the lockout or tagout devices to the energy isolating devices. Where the re-accumulation of stored energy to a hazardous energy level is possible, verification of isolation will be continued until the servicing or maintenance is complete.

6. **Verification of Isolation** – Prior to starting work on the machine or equipment that has been locked or tagged out, the authorized or qualified employee will verify that isolation or de-energization of the machinery or equipment has been accomplished, i.e. check the start button. If verified, the machine can now be serviced.

7. **Release from Lockout or Tagout** – Before lockout or tagout devices are removed and the energy restored to the machine or equipment, the following actions will be taken:
   - The work area will be thoroughly inspected to ensure that nonessential items have been removed and the machine or equipment components are operational. All guards and safety devices that were removed will be replaced.
   - The work area will be checked to ensure that all employees have been safely positioned or removed. Before lockout or tagout devices are removed, the affected employees will be notified that the lockout or tagout devices are being removed.
   - Each lockout or tagout device will be removed from each energy device by the employee who applied the device.
   - The machine will be tested for proper operations.

8. **Group Lockout or Tagout** – When servicing or maintenance is to be performed by a crew, they will each be provided with a lock or a tag. An authorized or when appropriate, a qualified employee, will assume responsibility of the entire crew so as to determine the exposure status of each group member and ensure continuity of protection. Each employee will affix a personal lockout or tagout device to a group lockout device, group lockbox or comparable mechanism when he or she begins work, and shall remove those devices when he/she stops working on the machine or equipment being serviced or maintained.

9. **Shift Changes** – In the event an employee leaves his/her lockout/tagout device on a machine, after their shift ends, the device will remain on the machine until the employee is located, or it is verified that they are no longer on the premise. The Service Director will remove the lock, following the appropriate procedures, note the removal on the lockout/tagout permit, and return the lockout/tagout device to the employee during their next shift.

10. **Annual Equipment Assessment** – At a minimum, on an annual basis an assessment of the property must be completed to determine if any new equipment has been brought on property and that procedures have been added to this program. The assessment must be conducted by a member of the management team who has a thorough understanding of this program.
A copy of the completed/signed Lockout/Tagout New Equipment/Annual Review Assessment Form should be kept at the property and a copy sent to the HR Dept. Annual Assessment forms are due by the 2nd week in January.

## Lockout Equipment List

Review the following sample. A specific listing will have to be developed at your community.

<table>
<thead>
<tr>
<th>Equipment</th>
<th>Energy Type and Hazard</th>
<th>Method to Control Hazard</th>
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<tbody>
<tr>
<td>Air Conditioners</td>
<td>Electrical</td>
<td>Lockout</td>
<td>Breaker</td>
<td></td>
</tr>
<tr>
<td>Heating Units</td>
<td>Electrical</td>
<td>Lockout</td>
<td>Breaker</td>
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</tr>
<tr>
<td>Wall Switches</td>
<td>Electrical</td>
<td>Lockout</td>
<td>Breaker in Apt.</td>
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<tr>
<td>Ceiling Fans</td>
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<td>Pool Pumps</td>
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</tr>
<tr>
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<tr>
<td>Dishwashers</td>
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<td>Water Heaters</td>
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## Purpose

This procedure establishes the minimum requirements for the lockout of energy isolating devices whenever maintenance or servicing is performed on machines or equipment. It shall be used to ensure that the machine or equipment is stopped, isolated from all potentially hazardous energy sources and locked out before employees perform any servicing or maintenance where the unexpected energization or start-up of the machines or equipment or release of stored energy could cause injury.
Compliance with This Program

All employees are required to comply with the restrictions and limitations imposed upon them during the use of lockout. Only trained authorized employees are permitted to perform the lockout of equipment in accordance with this procedure. All employees, upon observing a machine or piece of equipment that is locked out to perform servicing or maintenance shall not attempt to start, energize or use that machine or equipment.

Failure to comply with this policy can result in disciplinary action up to and including termination.

Lockout/Tagout – Annual Review Assessment Form

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<td></td>
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<tr>
<td>Air Handler</td>
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</tr>
<tr>
<td>Microwave</td>
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<td>Unplug/Breaker</td>
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<tr>
<td>Disposals</td>
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<td>CO2/Smoke Detectors</td>
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<tr>
<td>Range/Oven</td>
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**Additional Examples**

Lift Station – Electrical – Lockout – Disconnect/Breaker  
Any electrical equipment that is hard wired and serviced by SOM Team Members must be included in the program.

Assessment Completed by:

______________________________
Printed Name

______________________________
Signature
A copy of this completed form is to be kept at the property. Copies should be e-mailed to the Regional Office and to the Main Office, attention __________ – ________@______.com.

**Lockout/Tagout – New Equipment Assessment Form**

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**Additional Examples**

Lift Station – Electrical – Lockout – Disconnect/Breaker
Any electrical equipment that is hard wired and serviced by SOM Team Members must be included in the program.

Assessment Completed by:

__________________________________________

Printed Name

__________________________________________

Signature

A copy of this completed form is to be kept at the property. Copies should be e-mailed to the Regional Office and to the Main Office, attention __________ – _______@_______.com.
COMMON SAFETY RULES AND REGULATIONS

The following is a list of safety rules. By no means is this list comprehensive. Any and all work activity not contemplated below should be conducted in accordance with recommended safety practices and applicable rules and regulations. It is management’s expectation that all staff comply with these rules.

General Operating Guidelines

Safety First!

- Employees are required and expected to follow and adhere to all safety related rules and regulations while on the premises of this company and when performing duties or acting on behalf of this company.
- Report all hazards and unsafe conditions to a supervisor immediately.
- Work areas are to be kept neat, orderly and clean. Never allow conditions that will result in a safety hazard or unsafe condition.
- Staff members are required to report all injuries and illnesses, damage to machinery or equipment and near miss incidents to a supervisor immediately.
- Under no circumstances will an employee be allowed to be on the premises or operate a company vehicle with a detectable presence of alcohol or controlled substance in their system. Employees observed ingesting or in possession of alcoholic beverages or controlled substances, on company time and/or company property, will be subject to appropriate disciplinary action.

Lifting Procedures

- Plan the move before lifting; remove obstructions from your chosen path.
- Test the weight of the load before lifting by pushing the load along its resting surface.
- If the load is too heavy or bulky, use lifting and carrying aids such as hand trucks, dollies, carts, or get assistance from a coworker, especially when lifting furniture or appliances.
- The size and shape of an object should also be considered. Bulky materials or materials that may shift can create problems that should be considered before lifting. If possible, secure the load to prevent movement prior to lifting.
- To avoid scratches, cuts and abrasions, inspect material for slivers, rough edges or slippery conditions.
- When an employee has to handle long object, such as a pipe, lumber or a ladder, the front end of the material should be kept high and the rear end low, especially at corners or other areas where vision is obstructed.
- If assistance is required to perform a lift, coordinate and communicate your movements with those of your coworkers.
When you have someone helping you lift an object, teamwork becomes important. If you’re going to be carrying the load to another point, both of you should decide in advance how it is to be handled. Check the route and the clearance.

One person should be the leader and be in a position to observe and direct the other.

Lifting and lowering should be done in unison. Don’t let the load drop suddenly without warning your partner.

Never lift anything when your hands are greasy or wet.

Wear protective gloves when lifting objects with sharp corners or jagged edges.

Position your feet 6 to 12 inches apart with one foot slightly in front of the other.

Face the object.

Bend at the knees, not the back.

Keep your back straight.

Keep a firm grip on the object with your hands and fingers; use handles when present.

Hold objects as close to your body as possible.

Perform lifting movements smoothly and gradually; do not jerk the load.

If you must change direction while lifting or carrying the object(s), pivot your feet and turn your entire body, do not twist at the waist.

Set objects down in the same manner as you picked them up.

Do not lift an object from the floor to a level above your waist in one motion. Set the object down on a table or bench and then adjust your grip before lifting it higher.

Slide materials to the end of the tailgate before attempting to lift them off a pick-up truck.

Do not lift over the walls or tailgate of a truck bed.

Be sure the pathway is clear before you walk.

Driving Safety

The designated speed limits shall not be exceeded at any time.

Yield to pedestrians, bicyclists, etc. at all times,

Watch for children.

Slow down around playgrounds, pool and other areas with a high concentration of children.

Seat belts shall be utilized at all times.

Never leave the vehicle running when not attended.

Never leave the keys in the vehicle.

No vehicle shall be driven which has an obvious mechanical problem affecting the safety of the vehicle.

Company vehicles shall be inspected daily by the driver to assure that the vehicle is in good mechanical condition.

The driver is responsible for ensuring passengers wear their safety belts.
The driver must not operate a vehicle at any time when his/her ability to do so is impaired, affected, influenced by alcohol, illegal drugs, prescription or over-the-counter medication, illness, fatigue or injury.

Drivers must abide by all Federal, state and local motor vehicle regulations, laws and ordinances.

Drivers are responsible for ensuring the vehicle is maintained in safe driving condition

Obey all traffic laws and signs at all times.

Employees are not permitted to:

- Pick up hitchhikers.
- Use any radar detector, laser detector, or similar devices.
- Push or pull another vehicle or tow a trailer.
- Transport flammable liquids or gases unless a DOT or Underwriters’ Laboratories approved container is used, and only then in limited quantities

**Cell Phone Program**

The primary hazards of cellular communications include:

- **Driver Inattention** – Driver concentrates on multiple issues while also trying to drive. Driver often compromises defensive driving techniques.

- **Operational Distractions** – Driver removes hands from vehicle controls to operate cellular devices or to look up phone numbers and other materials as they converse with others.

- **Sudden Distractions** – Many drivers now try to operate “mini-offices” on their front seats. They move papers around while driving, lunge for devices or papers that shift while driving, etc.

It is recommended that drivers should not operate cellular communications while driving a vehicle. This applies to cellular phones, Blackberries, PDAs, etc.

If drivers are to use cellular communications, it is recommended that driver pull safely off the road and engage in communications once the vehicle is properly and safely parked.

If the phone rings while driving, it is recommended that the driver let the cellular voice mail service take the call and listen to the message later when you are parked.

**Golf Cart Operation**

- Only authorized employees over the age of 18 and with a valid driver’s license are allowed to operate carts.

- Never allow a resident to operate a golf cart.

- Prior to starting, make sure in proper gear and all occupants seated.

- Occupants are to remain seated at all times.

- Instruct occupants that they are not to exit the cart until it has completely stopped.

- Instruct occupants that they are to keep arms and legs inside moving carts at all times.
Drive cautiously and be extremely careful when transporting potential residents around the community.

Slow down around corners.

Use caution at intersections and areas of high vehicular and pedestrian traffic.

When left unattended, park in a low traffic area, set the parking brake and always remove the key.

At the beginning of each day, ensure that the brakes work and that tires and other safety critical equipment is in good condition.

All paths should be routinely inspected and applicable warning signs posted.

Make sure that charging areas are well ventilated, free from combustibles and uncontrolled ignition sources.

GENERAL OFFICE SAFETY

General Safety

Close drawers completely after every use.

Aisles, corners, and passageways must remain unobstructed. There should be no storage of materials in these areas.

Secure electrical cords and wires away from walkways.

Always use a stepladder for overhead reaching. Chairs and desks should never be used as ladders.

Clean up spills immediately.

Pick up objects coworkers may have left on the floor.

Report loose carpeting or damaged flooring.

Put heavy files in the bottom drawers of filing cabinets.

Store sharp objects such as pens, pencils, letter openers or scissors in drawers or with the tips pointing down in a container.

Don’t stack heavy articles on high shelves in earthquake prone areas.

Use handrails when ascending or descending stairs or ramps.

Do not store or leave items on stairways or walkways.

Do not run on stairs or take more than one step at a time.
Electrical

- Don’t use frayed or cracked electrical cords.
- Don’t overload outlets.
- Don’t use extension cords in an outlet that has only one outlet.
- Use cord covers or tape the cord down when running electrical cords across aisles and between desks.
- Turn the power switch to “off” and unplug office machines before adjusting, lubricating or cleaning them.
- Avoid using space heaters.

Fire Safety

- The best time to think about fire safety is before a fire starts. Learn the location of fire escape routes and how to activate the fire alarm. Participate in practice fire drills on a regular basis. Become familiar with stairway exits – elevators may not function during a fire, or may expose passengers to heat, gas and smoke.
- Heat-producing equipment – copiers, work processors, coffee makers and hot plates – are often overlooked as a potential fire hazard. Keep them away from anything that might burn.
- Electrical appliances can be fire hazards. Be sure to turn off all appliances at the end of the day. Use only grounded appliances plugged into grounded outlets (three prong plug).
- If electrical equipment malfunctions or gives off a strange odor, disconnect it and call the appropriate maintenance personnel. Promptly disconnect and replace cracked, frayed, or broken electrical cords.
- Keep extension cords clear of doorways and other areas where they can be stepped on or chafed and never plug one extension cord into another.
- Do not allow combustible material (boxes, paper, etc.) to build up in inappropriate storage locations (near sources of ignition).
- Fire equipment, extinguishers, fire door exits, and sprinkler heads should remain unobstructed. Materials should be at least 18 inches minimum away from sprinkler heads.

Management and Leasing Office

- Floors and walkways must be maintained in safe, passable condition and free of trip and fall hazards at all times.
- Office entrances should be provided with a storm mat to prevent floors from becoming slippery when rain or other weather conditions would contribute to a hazard.
- Take special precautions when icy conditions create hazardous walking surfaces outside of the office.
Electrical and telephone cords, computer cables, and other obstacles must be kept out of passageways and walkways. Furniture and equipment must be arranged to minimize cords and cables being utilized in walkways.

Liquid spills must be cleaned up immediately by the first person identifying the wet condition.

Broken or otherwise hazardous chairs must be repaired or replaced.

All rules and regulations in place regarding clubhouse rental and use must be followed at all times.

SERVICE TECHNICIANS: SAFETY RULES AND REGULATIONS

General Operating Guidelines

- Comply with safety and loss control policies identified by the community manager.
- Use safety equipment where and when required.
- When noting unsafe conditions, take immediate action to protect residents and employees.
- Promptly report all unsafe conditions to the community manager.
- Promptly report all accidents and near misses to the community manager.

General Work Area Guidelines

- Do not place material such as boxes or trash in walkways and passageways.
- Do not store or leave items on stairways.
- Do not block or obstruct stairwells, exits or access to safety and emergency equipment such as fire extinguishers or fire alarms.
- Do not place ladders in a passageway or doorway without posting warning signs or cones that detour pedestrian traffic away from the ladder. Lock the doorway which you are blocking and post a “Detour” sign.
- When using ladders to reach gutters, lights or banners, the ladders must be tied off at the top, and the bottom of the ladder must be secure on the ground.
- When moving an appliance, use caution to ensure that area is free of residents, in particular, staircases.
- Prior to moving an appliance, the doors must be secured in a manner to prevent them from opening during transportation.
- Never allow a resident to assist you when moving appliances.
- Paint in a well-ventilated room with open windows or exhaust fans.
- Close the lids of paint and thinner containers tightly after each use and when not being used.
- Only smoke in permitted and designated areas.
Equipment Operating Guidelines

- Never attempt to operate tools or equipment that you have not been specifically authorized and instructed to use.
- Never operate machinery or equipment without a thorough knowledge or understanding of operating and safety procedures.
- Never attempt to make unauthorized repairs or perform unauthorized service or maintenance on any machinery, equipment, or facilities.
- All equipment or machinery in need of repair must be reported to a supervisor immediately.
- Always utilize personal protective equipment as required or instructed.
- At no time will a resident be allowed to assist in repair or maintenance work. This includes the use of tools or equipment belonging to or under the responsibility of SOM.

Maintenance Shop Guidelines

- Keep your work area and the entire work place as clean as possible.
- Only dispose of shop rags in approved metal receptacles equipped with self-closing lids.
- Only store flammable and combustible liquids in approved fire-proof cabinets. Locate cabinets in areas free of other combustibles, ignition sources and resident occupancy.
- Perform welding and torch cutting in an area away from combustibles and in a manner that will not injure other employees and residents. Be prepared with a fire extinguisher and maintain an adequate fire watch to identify flare-ups.
- Make sure all materials stored in tiers are secured to prevent sliding, falling or collapse.
- Do not store materials where they obstruct exits.
- Do not stack materials too high or insecurely. Pipe, unless racked, will be properly stacked and blocked to prevent spreading.
- Keep aisles, passageways, fire lanes and work areas clear of unnecessary material.

Electrical Safety

Basic Safety

- Don't use any appliance or machinery while you are touching metal or anything wet.
- Unplug machinery and appliances before cleaning, inspecting, repairing or removing anything from them.
- Keep electrical equipment, machinery and work areas clean. Oil, dust, waste and water can be fire hazards around electricity.
- Keep access to panels and junction boxes clear.
Move flammable materials away from electric heat sources and lights.

Know the location of fuses and circuit breakers.

If you are not trained to work in high voltage areas, do not enter them, even in an emergency.

Make sure all electrical equipment is properly grounded.

Plug power tools into grounded outlets installed with Ground Fault Circuit Interrupters (GFCIs).

Check with your local utility before you dig or work near suspended power lines. A “live” line is very dangerous.

If someone has been shocked, separate the victim from the current before doing first aid. If you can’t turn off electricity easily, use rope, wood or other insulator to pull the victim away.

Use “A, B, C” rated extinguishers for electrical fires. Never use water.

Test GFCIs annually.

Report Unsafe Conditions

Report unsafe conditions such as the following to your supervisor:

- Shocking, sparking, overheating or smoking machinery;
- Corroded outlets, switches and junction boxes;
- Extension cords in permanent use;
- Non-pincheresistant cords strung through doorways;
- Extension cords running under area rugs;
- Exposed wiring; broken plugs, outlets, or walls; missing box covers or faceplates;
- Outlets in damp areas without GFCIs.

Take 7 Steps for Lockout/Tagout

Think, plan and check. If you are in charge, think through the entire procedure.

Communicate. Notify all those who need to know that a lockout/tagout procedure is taking place.

Identify all appropriate power sources, whether near or far from the job site.

Neutralize all appropriate power at the source. Disconnect electricity. Block movable parts. Release or block spring energy.

Lock out all power sources. Use a lock designed only for this purpose. Each worker should have a personal lock.
Tag out all power sources and machines. Tag machine controls, pressure lines, starter switches and suspended parts.
Do a complete test. Double-check all the steps above.

**Electrically Powered Tools**

- Do not carry equipment or tools by the cord.
- Disconnect the tool from the outlet by pulling on the plug, not the cord.
- Use only electrical tools which are double insulated and plugged into a Ground Fault Circuit Interrupter (GFCI).
- Use only protected cords or circuits when working in wet locations.
- Do not drive over, drag, step on or place an object on the cord.
- Do not operate power hand tools or use electrical cords if the ground pin from the three-pronged power plug is missing or has been removed.
- Do not operate power tools or use electrical cords with a two-pronged adapter or a two-conductor extension cord.
- Do not use power tools or equipment that does not have manufacturer or employer-provided guards or if safety devices, such as interlocks, do not work.
- Turn off electrical tools and disconnect the power source from the outlet before attempting repairs or service work. Tag the tool “Out of Service.”
- Do not leave tools unattended.
- Do not use power equipment or tools you have not been trained on.
- Tag worn, damaged or defective tools “Out of Service” and do not use them.
- Do not use cords that have splices, exposed wires or cracked or frayed ends.
- Make sure that your hands are not wet when plugging and unplugging flexible cords.

**Hand Tools**

- Use tied off containers to keep tools from falling off scaffolds or other elevated work platforms.
- Do not use a tool if its handle has splinters, burrs, cracks, splits or if the head of the tool is loose.
- Do not use impact tools such as hammers, chisels or punches that have “mushroomed” heads.
- When handing a tool to another person, direct sharp points and cutting edges away from yourself and the other person.
- When using knives, shears or other cutting tools, cut in a direction away from your body.
- Do not carry tools in your hand when climbing. Carry tools in a tool belt or hoist the tools to the work area with a hand line.
- Do not throw tools from one location to another, from one employee to another, or from scaffolds to other elevated platforms.
Carry all sharp tools in a sheath or holster.
Do not strike nails or other objects with the cheek of the hammer.
Use only a sledge-type hammer or a striking face wrench.
Use pliers with an insulated handle for electrical work.
Do not perform “makeshift” repairs to tools.
Keep the blades of all cutting tools sharp.
Return tools to their storage places after use.

Ladders and Step Ladders

Read and follow the manufacturer’s instruction label affixed to the ladder if you are unsure of how to use it.
Do not use a ladder that wobbles or leans.
Do not use a ladder that has loose rungs, cracked or split side rails, missing rubber footpads or other visible damage. Tag damaged ladders “Dangerous, Do Not Use” to prevent accidental usage.
Keep ladder rungs clean and free of grease. Remove build-up of material such as mud, snow, ice and loose dirt.
Do not use a metal ladder on rooftops or within 10 feet of electrical power lines.
Do not place ladders in a passageway or doorway without posting warning signs or cones that detour pedestrian traffic away from the ladder. Lock the doorway which you are blocking and post a “Detour” sign.
Allow only one person on the ladder at a time.
Face the ladder when climbing up or down.
Maintain three-point contact by keeping both hands and one foot or both feet and one hand on the ladder at all times when climbing up or down.
When performing work from a ladder, face the ladder and do not lean backward or sideways from the ladder.
Do not climb on the top two (2) rungs of a ladder.
When using an extension ladder, extend the top of the ladder at least three (3) feet above the edge of a roof line or working surface.
When using an extension ladder base should be 1 foot from the building (or top support, such as an eave) for every four (4) feet of ladder length up to the resting position. Counting rungs will give you a good estimate of the ladder length; rungs are about one (1) foot apart.
Secure an extension ladder in place by having another employee hold it or tie off both the top and the bottom of the ladder to the structure at the ground, with the ladder shoes, stakes, sand bags or other means necessary.
Do not place ladders on barrels, boxes, loose bricks, pails, concrete blocks or other unstable bases.
● Do not try to “walk” a ladder by rocking it. Climb down and move it.
● Do not carry items in your hands while climbing up or down the ladder.
● Do not use a ladder as a horizontal platform.
● Do not leave tools or materials on top of a stepladder.
● A sticker on a commercial ladder tells you its maximum weight capacity. Use only type I, IA, or IAA ladders, which can support 250, 300, and 375 pounds, respectively. OSHA says job-made portable ladders must be tested for strength; a regular ladder must be able to hold at least four (4) times its maximum weight capacity.
● Ladder rungs, cleats, and steps must be parallel, level, and evenly spaced (10 to 14 inches for most ladders). The rungs and steps of metal ladders must be grooved or roughened to minimize slipping.
● Side rails must be at least 11.5 inches apart.
● Do not tie ladders together.
● Wood ladders must not be painted with a coating that can hide defects.
● Set a ladder on firm, level ground. Use ladder levelers on uneven ground. Secure the ladder – tie it down, use slip-resistant feet, or have someone hold it in place. (A ladder on a slippery surface must be tied in place or held.)
● Keep the area around the top and bottom of a ladder clear. In passageways, doorways, or where traffic or other activities can occur, secure the ladder or block off the area.
● Stepladders: All four legs must be on solid, level ground. The spreaders must be locked fully open.
● Never climb on the cross-bracing. Never lean a stepladder against a wall.

See following page for a Ladder Safety Checklist.
LADDER SAFETY CHECKLIST

This checklist is intended for use on every ladder located at this community.

- Are the steps firmly anchored to the side rails?
- Are the steps slip-resistant?
- Are all surfaces free of oil, paint, water, grease and dust?
- Are the rails, braces, ropes, uprights or side rails loose or damaged?
- Are there any loose or missing hinges, screws nails, nuts or bolts?
- Are there any sharp corners or edges?
- Are there any knots or decayed areas on wooden ladders?
- If ladder was dropped, was it checked for damage before use?
- Are defective ladders tagged and removed from use?
- Are extension ladder ropes worn or broken?
- Are extension ladder locks in working order?
- Are ladders attached to buildings properly anchored?
- Are ladders attached to buildings free of clutter at the base?
- Does the community have a 6-foot fiberglass ladder for use around electricity?
Mowing

- Do not smoke while servicing, using or refueling a gasoline powered tool.
- Do not run a gasoline engine inside an enclosed area (i.e. storage room).
- Turn off engine when you are not cutting or trimming.
- Allow the engine to cool before performing maintenance or refueling.
- Allow the engine to cool before covering or storing it in the storage area.
- Visually inspect the area to be mowed. Remove or mow around hazards such as tree stumps, roots, rocks, branches, sprinklers, hoses, electrical cords, light fixtures, or pipes.
- Never bypass the “kill” switch on the mower handle.
- Put the mower into neutral before starting or shutting off a riding mower.
- Do not direct the grass discharge toward bystanders or walkways.
- Turn off the mower before dumping the grass catcher or removing clogged grass from the chute.
- When using a riding mower, only mow up and down the slope.
- To mow across a slope, use an upright mower.
- Keep the mower in gear when going down slopes.

Gasoline-Powered Lawn Maintenance Tools

- Always wear protective equipment such as safety shoes and safety glasses or goggles.
- Do not operate power equipment on which you have not been trained.
- Do not use tools with parts that are loose, worn, cracked or otherwise visibly damaged.
- Read and follow the manufacturer’s routine and preventative maintenance schedule.
- Tag damaged tools “Out of Service” to prevent accidental start-up or use.
- Only use grip locations specified by the manufacturer as handholds when operating the unit.
- Do not alter or bypass any safety device provided by the manufacturer or employer.
- Do not pour fuel into the tank of a running engine.
- Do not smoke while servicing, using or refueling a gasoline powered tool.
- Keep body parts and clothing away from a running engine and cutting blade.
- Do not run a gasoline engine inside an enclosed area (i.e. storage room).
- Turn off engine when you are not cutting or trimming.
- Allow the engine to cool before performing maintenance or refueling.
Allow the engine to cool before performing maintenance or refueling.
Stop the engine and disconnect the spark plug wire before cleaning, inspecting, adjusting or repairing cutting blades or other rotating parts.
Allow the engine to cool before covering or storing it in the storage area.

**Edging/Chain Saw**

- Wear proper protective equipment such as gloves, face/eye shields, chap (for chain saws), long sleeves and pants and sturdy shoes.
- Do not start an edger with the blade touching the ground.
- Do not allow anyone to stand in front of or on the unguarded side of the blade while the edger is in operation.
- When edging along roads, stay as close to the curb as possible.
- Never let the moving chain contact any object at the tip of the guide bar to reduce the chance of a kickback.
- Keep the chain sharp and properly adjusted according to the manufacturer’s instructions.
- Do not remove safety devices such as hand guards.
- Cut away from your body and below your shoulder level when using a chain saw.
- You should always handle or operate a chain saw with care and be mentally alert. Never operate a chain saw if you have taken any substances that affect your ability to operate machinery.

**Handling Appliances**

Appliances are normally bulky and heavy. Due to the nature of our industry, we are quite often required to move these items on a regular basis. With this in mind, the following procedures should be followed:

- When moving an appliance by yourself, an assisting device such as an appliance dolly will be used at all times.
- Whenever possible, get help from a fellow employee. This is especially important when moving an appliance up or down a stairwell.
- Never allow a resident to assist you when moving an appliance.
- Leather gloves will be worn when moving an appliance.
- Prior to moving or working on an appliance, the appliance should be unplugged. Prior to moving an appliance, the doors should be secured in a manner to prevent them from opening during transportation.
Trash Compactor Safety

- Make certain that the control button has a locking device. If not, you need to install a padlock or install a control panel that will allow it to be locked.
- The control button panel is to be locked at all times except when being used by the authorized employee having the key.
- Keep the gate around the compactor locked except during normal business hours when it is necessary for the groundskeepers and maintenance personnel to have access numerous times each day.
- Keep the compactor in optimum working condition at all times. If the equipment is not operational, prepare sufficient signage indicating that the equipment is not safe to operate.
- Do not attempt to load items that will not compact or that will jam the equipment.
- Keep the compactor area clean and free of debris.
- Install a NO SMOKING sign inside the fenced area.
- Install a sign on the gate door indicating “NO ADMITTANCE – AUTHORIZED INDIVIDUALS ONLY.”

Pesticide Application

- Always obtain and read a Safety Data Sheet on any product you use.
- Always wear gloves when handling and using pesticides. Make sure to rinse gloves off and wash your hands when finished.
- Do not handle or spray pesticides if you have open cuts or scratches on exposed skin surfaces on your arms or hands.
- Do not transport a pesticide container in the cab of a vehicle.
- Do not smoke or carry smoking materials while handling or spraying from a container marked “pesticide.”

Painting Safety

- Paint in a well-ventilated room with open windows or exhaust fans.
- Always wash your hands with soap and water after using paint. Do not use mineral spirits, paint thinner, acetone or any other toxic solvents to remove paint from your skin.
- Store rags that have oil or paint on them in closed metal containers labeled “Oily Rags Only.”
- Press the pressure relief valve on painting canisters and painting guns/sprayers before disconnecting them.
- Do not eat or store food where spray painting is present.
- Close the lids of paint and thinner containers tightly after each use and when not being used.
Plumbing

- Always use precautions, such as wearing protective gloves and eye-wear, when taking apart pipe traps in kitchens and bathrooms. The pipe trap may contain caustic drain cleaners.
- When using a power snake for sewer clean-outs make sure a minimum amount of snake is exposed to prevent injury from the snake twisting around itself.
- Always wear rubber gloves when performing repairs on plumbing equipment that might expose you to raw sewage.

HOUSEKEEPING: SAFETY RULES AND REGULATIONS

General Operating Guidelines

- Comply with safety and loss control policies identified by the community manager.
- Use safety equipment where and when required.
- When noting unsafe conditions, take immediate action to protect residents and employees.
- Promptly report all unsafe conditions to the community manager.
- Promptly report all accidents and near misses to the community manager.

General Work Area Guidelines

- Do not place material such as boxes or trash in walkways and passageways.
- Do not store or leave items on stairways.
- Do not block or obstruct stairwells, exits or access to safety and emergency equipment such as fire extinguishers or fire alarms.
- Do not place ladders in a passageway or doorway without posting warning signs or cones that detour pedestrian traffic away from the ladder. Lock the doorway which you are blocking and post a “Detour” sign.
- When moving an appliance, use caution to ensure that area is free of residents, in particular, staircases.
- Prior to moving an appliance, the doors must be secured in a manner to prevent them from opening during transportation.
- Never allow a resident to assist you when moving appliances.
- When using chemicals, make sure room is well ventilated with open windows or exhaust fans.
- Only smoke in permitted and designated areas.
**Equipment Operating Guidelines**

- Never attempt to operate tools or equipment that you have not been specifically authorized and instructed to use.
- Never operate machinery or equipment without a thorough knowledge or understanding of operating and safety procedures.
- Never attempt to make unauthorized repairs or perform unauthorized service or maintenance on any machinery, equipment, or facilities.
- All equipment or machinery in need of repair must be reported to a supervisor immediately.
- Always utilize personal protective equipment as required or instructed.

**Housekeeping Shop Guidelines**

- Keep your work area and the entire work place as clean as possible.
- Only dispose of shop rags in approved metal receptacles equipped with self-closing lids.
- Only store flammable and combustible liquids in approved fire-proof cabinets. Locate cabinets in areas free of other combustibles, ignition sources and resident occupancy.
- Make sure all materials stored in tiers are secured to prevent sliding, falling or collapse.
- Do not store materials where they obstruct exits.
- Keep aisles, passageways, fire lanes and work areas clear of unnecessary material.

**Electrical Safety**

### Basic Safety

- Don’t use any appliance or machinery while you are touching metal or anything wet.
- Unplug machinery and appliances before cleaning, inspecting, repairing or removing anything from them.
- Keep electrical equipment, machinery and work areas clean. Oil, dust, waste and water can be fire hazards around electricity.
- Move flammable materials away from electric heat sources and lights.
- Know the location of fuses and circuit breakers.
- Make sure all electrical equipment is properly grounded.
- Plug power tools into grounded outlets installed with Ground Fault Circuit Interrupters (GFCIs).
Report Unsafe Conditions

- Report unsafe conditions such as the following to your supervisor:
  - Shocking, sparking, overheating or smoking machinery.
  - Corroded outlets, switches and junction boxes.
  - Extension cords in permanent use.
  - Non-pinching-resistant cords strung through doorways.
  - Extension cords running under area rugs.
  - Exposed wiring; broken plugs, outlets, or walls; missing box covers or faceplates.
  - Outlets in damp areas without GFCIs.

SAFETY MEETINGS

Following the employee orientation and initial training, a series of follow-up programs can be used to ensure implementation and consistency of safe behaviors and desired results for each community.

Safety meetings should be held at least monthly. Documentation of safety meetings and training session is crucial. Refer to the following Safety Meeting Record form for documentation purposes. It is very important that every safety meeting is properly documented. Minutes from Monthly Safety Meetings shall be kept on site in a secure location, and accessible to all employees.
<table>
<thead>
<tr>
<th>Topics discussed:</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. Training Topic:</td>
</tr>
<tr>
<td>B. Hazards and Safety Issues (Use Hazard Reporting Form)</td>
</tr>
<tr>
<td>C. Accident Investigation- See IIPP for instructions</td>
</tr>
<tr>
<td>D. Future actions to be taken to prevent a repeat of similar accident:</td>
</tr>
</tbody>
</table>
ACCIDENT INVESTIGATIONS

A primary tool you should be using in an effort to identify and recognize the areas responsible for accidents is a thorough and properly completed accident investigation. It should be in writing and adequately identify the cause(s) of the accident or near-miss occurrence.

Accident investigations should be conducted by trained individuals, and with the primary focus of understanding why the accident or near miss occurred and what actions can be taken to preclude recurrence. In large organizations this responsibility may be assigned to the safety director. In smaller organizations the responsibility may lie directly with the supervisor responsible for the affected area or employee. Questions to ask in an accident investigation include:

1. What happened?

The investigation should describe what took place that prompted the investigation: an injury to an employee, an incident that caused a production delay, damaged material or any other conditions recognized as having a potential for losses or delays.

2. Why did the incident happen?

The investigation must obtain all the facts surrounding the occurrence: what caused the situation to occur; who was involved; was/were the employee(s) qualified to perform the functions involved in the accident or near miss; were they properly trained; were proper operating procedures established for the task involved; were procedures followed, and if not, why not; where else this or a similar situation might exist, and how it can be corrected.

3. What should be done?

The person conducting the investigation must determine which aspects of the operation or processes require additional attention. It is important to note that the purpose here is not to establish blame, but to determine what type of constructive action can eliminate the cause(s) of the accident or near miss.

4. What action has been taken?

Action already taken to reduce or eliminate the exposures being investigated should be noted, along with those remaining to be addressed. Any interim or temporary precautions should also be noted. Any pending corrective action and reason for delaying its implementation should be identified. Corrective action should be identified in terms of not only how it will prevent a recurrence of the accident or near miss, but also how it will improve the overall operation. This will assist the investigation in selling his/her solutions to management. The solution should be a means of achieving not only accident control, but also total operation control.

If you have a safety and health committee, its members should review investigations of all accidents and near-miss incidents to assist in recommending appropriate corrective actions to prevent a similar recurrence.
Thorough investigation of all accidents and near misses will help you identify causes and needed corrections, and can help you determine why accidents occur, where they happen, and any accident trends. Such information is critical to preventing and controlling hazards and potential accidents.

**HAZARD AWARENESS AND INSPECTIONS**

Periodic inspections to identify and evaluate workplace hazards are to be performed by the on-site lead maintenance supervisor. The methods employed include:

- Monthly job site inspections to be completed at the beginning of the week. Checklists will be provided to complete these inspections. The purpose of the checklist is to identify actual and potential hazards on the property. If hazards are identified, management and supervisors are to make employees aware of the hazards and provide employees with the proper training and equipment to abate the hazard.

- All unsafe or unhealthy work conditions or work practices identified will be evaluated and corrected. Unsafe or unhealthy work conditions or work practices will be corrected in a timely manner, as determined by the severity of the hazard.

- Under no conditions will our personnel be required to, or permitted to, work under conditions which pose a clear or imminent hazard. Problems that cannot be corrected immediately will be assigned to the Property Manager to ensure completion of the corrective action.

- When an imminent hazard exists which cannot be immediately corrected without endangering employees and/or property, the following steps will be followed:
  - Remove all potentially endangered employees;
  - Provide employees responsible to correct the condition with necessary safeguards;
  - Correct the problem; and
  - Document the corrective action and date corrected in accordance with this section. The documentation is to be completed by the Property Manager and sent to Human Resources.

- Monthly inspections of the shops and storage areas are also expected to be performed. Inspections will be conducted at the following intervals, in addition to those listed above:
  - At the effective date of this program;
  - Whenever new substances, processes, procedures, or equipment are introduced to the workplace which present a new occupational safety and health hazard;
  - Whenever Community Manager is made aware of a new or previously unrecognized hazard.