

SAFETY PROGRAM

FOR

KEMPNER WATER SUPPLY CORPORATION

May 25, 2022

SAFETY POLICY

Your safety is the constant concern of Kempner Water Supply Corporation. Every precaution has been taken to provide a safe workplace. Your Safety Officer makes regular inspections, holds regular safety meetings, meets with management to plan and implement further improvements in our safety program. Common sense and personal interest in safety are still the greatest guarantees of your safety at work, on the road, and at home. We take your safety seriously and any willful or habitual violation of safety rules will require disciplinary action or cause for dismissal. Kempner Water Supply Corporation is sincerely concerned for the health and wellbeing of each member of the team.

The cooperation of every employee is necessary to make this company a safe place in which to work. Help yourself and others by reporting unsafe conditions or hazards immediately to your department manager. Give earnest consideration to the rules of safety presented to you by your department manager, poster signs, and regulations published in this safety program policy. Begin right by always thinking of safety as you perform your job, or as you learn a new one.

Any injury at work—no matter how small—must be reported immediately to your department manager, documented, and first aid administered. Serious conditions often arise from small injuries if they are not cared for at once.

The following safety program company policy is written for your safety and welfare. Accident prevention is essential in maintaining a safe work environment.

In conclusion, be always very aware of your surroundings and think SAFETY FIRST!

Sincerely,

Delores Coberley
General Manager

ASSIGNMENT OF RESPONSIBILITY

MANAGEMENT

The management of Kempner Water Supply Corporation is responsible for developing and implementing the safety program. It is their duty to provide and maintain a safe place for the employees to work. Management will follow up on recommended abatement measures and review periodically the safety program for needed improvement or revision. Delores Coberley, General Manager, will assume responsibility for establishing objectives and reviewing the safety program annually.

SAFETY OFFICER (Michael Lentz) & HR Dept (Stacy Ellis and Cindy Benson)

The safety officer is responsible, either personally or by delegating the task, for the following activities with regard to the safety program.

- ❖ Initial indoctrination of new hires on company policy and procedure including safety, hazard communication and accident reporting.
- ❖ Maintaining safety program records including injury logs, audit/inspection reports, and accident investigation reports.
- ❖ Provides necessary resources and tools in relation to the safety program, training and meetings.
- ❖ Completes all required reports in relation to the safety program, injuries and accidents.

SAFETY OFFICER (Michael Lentz)

The safety officer is responsible, either personally or by delegating the task, for the following activities regarding the safety program.

- ❖ Conducting a facility inspection recording the (1) Name of inspector; (2) Date of inspection; (3) Discrepancies found; (4) Name of person responsible for corrections; and (5) Estimated date of correction.
- ❖ Conducting safety or specialized training or meetings on a monthly basis.
- ❖ Perform and complete accident investigation reports such as “Safety Inspection Guide”, “Department Managers Investigation of Accidents” and “Safety Orientation” Reports.
- ❖ Program review.

ANALYSIS OF ACCIDENTS

The Safety Officer will analyze accidents and complete “Department Managers Investigation of Accident” form (see attached) for corrective action proposed and follow-up actions taken. The principal source of accidents will be identified and located by determining the machines, tools, and materials most frequently involved in accidents and operations most likely to produce injury. This analysis should highlight:

- a. Nature and size of accident problem by specific operation
- b. Principal hazards associated with various equipment
- c. Inefficiencies in operating procedures from:
 1. Outdated work methods
 2. Exceeding physical capabilities of workers
 3. Lack of proper equipment
 4. Unsafe practices requiring additional training

The Safety Officer will analyze all documented evaluations of all reported accidents, incidents and identified hazards in October of each year. The primary source of data for this analysis will be information provided on the "Department Managers Investigation of Accident" report, completed safety inspection reports, and any other incident report of equipment damage or "near miss", or reports provided by the insurance loss control representative.

IDENTIFICATION

Each job function will be reviewed by the Safety Officer to identify hazards associated with it. Once identified, one or more of the following steps will be applied:

- ❖ Elimination of the hazard if practical.
- ❖ Use of an alternate method or process.
- ❖ Develop written safety rules and standard operating procedures for dealing with hazards.

All new job functions will be reviewed for associated hazards before employees are allowed to work in those areas.

IMPLEMENTATION

All hazards identified will be communicated by the Safety Officer to current employees verbally, in writing and supplemented with appropriate training. This documentation and training will be added to this program.

GENERAL SAFETY RULES

1. All accidents and injuries--no matter how minor--will be reported immediately to your department manager. Late reporting of injuries will not be tolerated.
2. Employees will follow all established safety procedures and report any unsafe conditions or equipment to their Safety Officer or department manager.
3. While on KWSC premises and while conducting business-related activities off KWSC premises, no employee may use, possess, distribute, sell, or be under the influence of alcohol or illegal drugs. Violations of this policy may lead to disciplinary action, up to and including immediate termination of employment. This also includes employees on call.
4. Notify your department manager. If you are taking any prescription medications which may impair your ability to safely perform your duties. Employee's will not be allowed to operate vehicles, equipment, tools or be allowed to perform regular duties until a doctor's release is provided stating the employee may return safely back to work.
5. Weapons, including firearms, large knives, or illegal items are prohibited on company property except as provided by the Concealed Carry Policy. Noncompliance with this policy may result in immediate termination and/or disciplinary action.
6. Guards will not be removed from equipment except for maintenance or repair. The guard will be promptly reinstalled as soon as the repair or maintenance is complete. Equipment will not be used unless all guards are installed.
7. Employees will use the personal protective equipment designated for the task being performed.
8. Maintain a clean and organized work area. Tools and supplies must be picked up and returned to the designated storage as soon as the job is completed.
9. Smoking is prohibited except in designated areas.

10. Horseplay, scuffling and other acts which tend to endanger the safety of employees are prohibited and may result in disciplinary action.
11. When heavy objects (> 50 lbs.) must be lifted, mechanical assistance in the form of a hand truck or platform cart will be used. Two people will make the lift when possible. Never twist at the waist while making a heavy lift. Turn your feet in the direction you need to go.
12. Employees who are unable to report to work due to illness or an emergency should notify their department manager before the scheduled start of their workday. For a non-emergency absence, you are required to give at least 3 days' notice.

MOTOR VEHICLE SAFETY RULES

1. All operators of Company motor vehicles must practice defensive driving when operating those vehicles. Employees may be required to take a defensive driving course as needed or incorporated into a monthly safety meeting.
2. All operators of Company vehicles must have valid, appropriate driver's licenses.
3. The Certificate of Insurance coverage and other required documents, along with Company accident forms should be carried in all Company owned vehicles.
4. All drivers of Company motor vehicles must be familiar with and abide by updated state, federal, and local traffic regulations.
5. Seat belts must be always worn by occupants of Company vehicles and personal cars used on Company business. Texas Occupant Restraint Laws Section 545.413 states if the person is employed by a public or private utility company and is engaged in the reading of meters or performing a similar duty for that company requiring the operator to frequently enter into and exit from a vehicle has a defense from prosecution.
6. Equipment on all Company motor vehicles must conform to state, federal, and Department of Transportation (DOT) regulations.
7. Picking up hitchhikers is prohibited.
8. Any automotive accident involving a company owned, rendered, or leased vehicles, major or minor, must be reported as soon as possible to the department manager, and law enforcement accident reports must be requested.
9. Employees are encouraged to use discretion when operating vehicles equipped with catalytic converters. Potential risks increase when driven onto grassy spots or an area where gas accumulations are possible, since the extremely hot converter can create a fire hazard.
10. A driver should make it a habit to look around the vehicle for potential hazards before each use.
11. Driving at the maximum posted speed limit can be too fast for safety in some situations. The driver of a Company vehicle should use good judgment and proceed at a pace suitable to conditions of the vehicle, the road, the traffic, and the weather.
12. No gasoline or diesel fuel should be added to the fuel tank of a motor vehicle while the engine is running. If a servicing unit equipped with an engine is used to fuel the vehicles, the engine of that unit should also be shut off unless its power is needed to deliver the fuel.
13. Smoking is prohibited near a vehicle being refueled.
14. Immediate disciplinary action and/or termination in accordance with the Employee Handbook. Progressive Discipline will result for any employee arrested for any type of Driving under the influence.

RECORDKEEPING

INJURY RECORDS

An injury log will be maintained by the Safety Coordinator. Injuries will be recorded on a form or equivalent within 24 hours of being reported.

The summary portion of the injury log will be posted from February 1st through April 30th each year in a place where employee notices are customarily placed.

Injury records will be retained for a period of 5 calendar years.

INSPECTION REPORTS

Safety Officers are responsible for completing "Safety Inspection Guide" reports. The documentation will include: (1) Date of inspection, (2) Name of inspector, (3) Discrepancies found, (4) Person responsible for correction, and (5) Estimated date of correction.

Reports will be maintained until all discrepancies have been corrected or at least 12 months whichever is longer. Completed reports are to be filed with the Safety Coordinator.

SAFETY MEETINGS/TRAINING

Safety Officers are responsible for conducting safety meetings/training. The documentation will include: (1) Date of training, (2) Name of trainer, (3) Subject(s) covered, and (4) signed or initialed attendance roster.

Reports will be filed with the Safety Coordinator to be placed in a log and maintained for a period of 24 months

ACCIDENT INVESTIGATION REPORTS

Safety Officer will complete accident investigation reports in writing and will be filed with the HR Department where it is available for review. The investigation will be documented on the company form. The report will be maintained a minimum of 24 months.

EDUCATION & TRAINING

INITIAL INDOCTRINATION

New hires will receive an orientation prior to being assigned duties. The orientation will include as a minimum: company policies and benefits, safety rules, accident reporting procedure, and disciplinary policy. The Safety Officer will conduct the "Initial Safety Orientation Report" and HR Dept will obtain the employee acknowledgment to receiving the information.

Upon assignment for duty, the Safety Officer or their designee will provide a hands-on demonstration on the correct operation of any equipment or tools. Coaching and close supervision will be provided during the first 90 day probationary period.

SAFETY MEETINGS

Safety meetings will be held at least once each month. Attendance will be documented. Meetings can be scheduled on a more frequent basis at the discretion of the General Manager or Safety Officer. Topics will include safety at the job site, but not limited to, lift training, equipment operation, slip and fall accidents, driving in traffic safety, and prevention of struck by accidents. Other subjects are to be added as necessary. Employees that miss safety meetings will be required to make up the meetings at convenient dates and documentation will be made of this make up training.

SPECIALIZED TRAINING

Additional training will be scheduled by the Safety Officer when new equipment is introduced, work procedures are modified or changed, or when injury trends indicate a need for additional training.

INSPECTIONS/AUDITS

The Safety Officers or their designee for Distribution and Plant will survey the operations daily at the beginning of the shift to check equipment guards, housekeeping, damaged equipment, or other hazards which need correcting. The availability and use of personal protective equipment will be determined.

A planned facility and job site inspection to include the completion of the "Safety Inspection Guide" will be made monthly, with a written report to document the inspection by the Safety Officer and will be filed with the Safety Coordinator. The report will include: (1) Date of inspection, (2) Name of inspector, (3) Discrepancies found, (4) Person responsible for correction, and (5) Estimated date or correction.

The Safety Officer for the office will survey the building periodically to check for housekeeping, damaged equipment, or other hazards which need correcting.

Safety Inspection reports such as the "Department Managers Investigation of Accident" and injury records will be reviewed quarterly (March, June, September & December) by the General Manager to determine if abatement procedures have been completed and are effective.

The report will be kept on file with the Safety Officer and HR Department.

ACCIDENT INVESTIGATION

A written "Department Managers Investigation of Accident" report will be completed and given to the Safety Officer within 24 hours of being reported. These investigations will include all injury accidents and near miss accidents. The root cause of the accident or near miss accident will be determined and corrective action will be developed to reduce the chance of a recurrence. The report will be completed on the "Department Managers Investigation of Accident" form and provided to the General Manager, HR Department and Safety Coordinator within 24 hours.

The Safety Officer will conduct a follow-up on the recommended corrective action within 30 days. Action will be taken immediately if the corrective action has not been taken.

The completed report will be kept on file with the Safety Officer and HR Department.

PROGRAM REVIEW

The safety program will be reviewed on at least an annual basis to determine effectiveness of abatement measures and cover the following:

- Follow-up on all recommended abatement measures to evaluate the effectiveness of current operational procedures and the status of the safety program.
- The review will include all equipment, procedures, etc. added since the last review.
- Documentation will be revised to address deficiencies revealed during the review.
- Retraining will be provided if necessary.

APPENDIX

KEMPNER WATER SUPPLY CORPORATION

INITIAL SAFETY ORIENTATION REPORT

TOPIC	SAFETY OFFICER INITIALS	EMPLOYEE'S INITIALS	DATE COMPLETED
COMPANY SAFETY PROGRAM			
GENERAL SAFETY DEVICES			
SAFETY RULES FOR SPECIFIC JOBS			
REPORTING UNSAFE EQUIPMENT OR CONDITIONS			
HOUSEKEEPING (I.e., pathways clear of hazards)			
PROTECTIVE EQUIPMENT			
CONDUCT ON JOB			
EMERGENCY PROCEDURES/EVACUATION			
MATERIAL HANDLING			

I have received training in the above topics as indicated and fully understand the instructions. I agree to observe these rules, policies, and procedures as a condition of employment.

I understand that failure to observe these instructions can result in disciplinary action that could include termination of employment.

Employee Signature

Date

Safety Officer Signature

Date

KEMPNER WATER SUPPLY CORPORATION

SAFETY MEETING

Distribution and Office

Date: _____

Presenter: _____

Subject: _____

Attendees: (Please Initial)

Delores Coberley _____

James "JT" Butler _____

Susan Isenburg _____

Chris Mick _____

Kenny Vargas _____

Michel Gordon _____

Stacy Ellis _____

Jeremy Tucker _____

Cindy Benson _____

Brandon Nault _____

JoAnne Alesick _____

Zach Radenz _____

Melody Stults _____

Wayne McAnally _____

Michael Lentz _____

Bryan "Bo" Wilson _____

Next Meeting: _____

Materials Used: _____

Notes:

KEMPNER WATER SUPPLY CORPORATION

DEPARTMENT

“SAFETY INSPECTION GUIDE”

INSPECTED BY

INSPECTION

PURPOSE: To be used as a guide to self-inspection by Safety Officers. The guides to hazards in this form are general and incomplete. The inspector should expand these to fit the actual situation.

- Well-planned safety inspections help in detecting hazards before an accident occurs.
- Before the inspection, analyze past accidents to determine specific causes and high hazard areas or operations. Give special attention to these during the inspection.
- Removing hazards increases operating efficiency because safety and efficiency go hand in hand.
- Both unsafe conditions and unsafe acts are contributing factors in industrial accidents. An unsafe condition, in addition to being a direct cause of accidents, often requires or suggests an unsafe act.

INSPECTION GUIDES	YES	NO	RECOMMENDATIONS*
BUILDING ENTRANCES & PREMISES - Are blind spots eliminated? Do all exit doors open outward? Are all stumbling or slipping hazards removed?			
STAIRWAYS - Are handrails and treads in good condition? Are risers of proper height, and lighting adequate?			
FLOORS -Are holes, splinters, protruding nails, slippery or loose boards eliminated? Are openings protected?			
AISLES & PASSAGEWAYS - Are they of adequate width and unobstructed? Are they well-defined, marked or painted?			
MACHINERY -Are belts, gears, chains, clutches and shafting properly guarded? Is effective point of operation guards in place where additional guarding is needed (if any)?			
HAND TOOLS - Are mushroomed heads, split and loose handles eliminated? Are cutting edges sharp?			
HOISTING EQUIPMENT - Are safety devices, interlocks, etc. in order? Has the shear hazard danger of foot injury between landing and car floor been eliminated?			
FIRE & EXPLOSION HAZARDS - Inspect firefighting equipment -fire extinguishers, date refilled, hose, etc. Is rubbish, oily waste, disposed of properly? Are explosive or flammable materials properly stored and ventilated? Are oxygen and acetylene bottles (equipment) stored properly?			
LADDER, SCAFFOLDS & HORSES -Are they standard construction and in good condition? Are they used and/or mounted properly?			

“No” Answers should have recommendations

INSPECTION GUIDES	YES	NO	RECOMMENDATIONS*
ELECTRICAL EQUIPMENT - Are electrical tools, switch or starting boxes and machines properly grounded? Do switchboards have non-conducting platforms, mats, etc.? Does all wiring, fixtures, connections, extension or portable cords, etc., have safe insulation and installation? Are safe tools, gloves, and protective equipment in order?			
HOUSEKEEPING - Are materials properly stacked to prevent falling? Is overhead clearance ample? Are walking or working areas free from rubbish, spare tools, or materials? Are tools racked? Are storage bins orderly? Has the possibility of overhead falling hazards from tools or material been eliminated?			
LIGHTING, VENTILATION - Is the proper kind and amount of light adequate and in working order in and around work benches, machines, desks, stairways and passages and general work areas? Is glare avoided? Is there proper ventilation against drafts, for freedom from dust, gases, fumes or vapors?			
UNSAFE ACTS OF EMPLOYEES - Watch for the following: Is the equipment used only with proper authority? Is material piled in a secure, orderly arrangement? Is equipment operated at safe speed? Are the proper tools or equipment used safely? Safe loading of trucks, skids, racks, conveyors, etc.? Lifting properly or handling heavy loads in a proper manner? Using tools or equipment properly? Are guards or safety devices used properly? Is the personal protective equipment in use? Repairing or adjusting machinery only while stopped or under low pressure or de-energized? Is horseplay avoided?			
PERSONAL PROTECTIVE EQUIPMENT -Is the proper personal protective equipment available and used? Is protection against radioactive exposure adequate?			
FIRST AID - Are supplies adequate? Are they fresh - particularly the antiseptics? Are there employees trained in first aid? Have names of doctors, to call in emergencies, been posted?			
MECHANICAL LOADING EQUIPMENT - Check overhead cranes, chains, slings, and ropes to ensure they are working properly and show no signs of damage. (This item should be developed for all type equipment in use.)			
GENERAL COMMENTS - List other hazards that do not fit in the above categories.			

"No" Answers should have recommendations

ACCIDENT INVESTIGATION QUESTION GUIDE

MANAGEMENT CONTROLS	QUESTIONING GUIDE	NOTES & SOLUTIONS
PEOPLE	WHO WAS INVOLVED?	
	What qualifications are necessary to perform the task?	
PLACEMENT	Who is most qualified?	
	Why was this employee selected if not most qualified?	
TRAINING	What instructions of training were provided?	
	What additional training is needed?	
ENFORCEMENT	What instructions or rules were not followed?	
	What additional rule or enforcement action should be established?	
MOTIVATION	What position measures have been taken to promote correct behavior?	
	What additional measures are necessary?	
EQUIPMENT	WHAT EQUIPMENT WAS INVOLVED?	
DESIGN & ARRANGEMENT	Why was this equipment used? What equipment should be used?	
	What guards were or were not used?	
	What arrangement problems were present?	
PURCHASING	What additional design/arrangement controls were necessary?	
	How did the quality hazards of equipment contribute to loss?	
MAINTENANCE	What additional purchasing controls are needed?	
	What maintenance problems were evident?	
PERSONAL PROTECTIVE EQUIPMENT	What maintenance should be performed?	
	How can maintenance be improved?	
	What Personal Protective Equipment is provided?	
	When should PPE be used?	
	What PPE should be provided?	
MATERIAL	WHAT MATERIAL WAS INVOLVED?	
	What design characteristics contributed to the loss?	
DESIGN & ARRANGEMENT	How should material be designed?	
	How was the material arranged, handled, and used?	
	Where the material should be arranged?	
PURCHASING	Why was the material being used?	
	What material should be used?	
ENVIRONMENT	WHAT ENVIRONMENTAL FACTORS ARE INVOLVED?	
	(Building, noise, vapor, illumination, weather, etc.)	
DESIGN & ARRANGEMENT	Why was it designed and arranged this way?	
	How should it be designed and arranged?	
	What purchasing controls are necessary?	
PURCHASING	When should housekeeping be performed?	
	How should housekeeping be improved?	
HOUSEKEEPING	What maintenance problems are evident?	
	When should maintenance be performed?	
MAINTENANCE	How should maintenance be improved?	

**INSTRUCTIONS FOR USE OF
"DEPARTMENT MANAGER'S INVESTIGATION OF ACCIDENT" FORM**

This form is not a report to the insurance carrier. It is to be used as a guide to more thorough investigation and study of accident causes. It will be completed for every accident resulting in personal injury and/or property damage. The steps necessary in investigating an accident and filling out the form are:

1. Discuss the accident with the injured employee and with witnesses.
2. Inspect the equipment or materials involved for conditions that can be made safer.
3. Study the job set-up and manner of doing the work. Could it be improved?
4. Decide what acts, conditions or circumstances caused or permitted the accident, and describe them in the report. Do not use the term "carelessness"; it is too indefinite. Try to substitute "lack of skill", "lack of knowledge of hazards", "not instructed", "disobeyed instructions", etc. These are things about which something can be done.
5. Suggest some action by management to prevent similar accidents in the future. Assume the attitude that all accidents are simply the result of mistakes or errors and that it is the department manager's job to prevent such things as much as possible.
6. Prepare your report and turn it in to the person who is designated by your management.

The file of accumulated reports should be studied frequently by persons responsible for the over-all accident prevention program. Managers should make free use of these reports in conducting safety discussions with employees.

When preventive measures are suggested in a report, it should be referred to the person with authority to act and should be given prompt attention.

KEMPNER WATER SUPPLY CORPORATION
DEPARTMENT MANAGER'S INVESTIGATION OF ACCIDENT

NAME OF INJURED EMPLOYEE	DATE INJURY WAS REPORTED	
WHERE DID ACCIDENT OCCUR?	DATE OF ACCIDENT	
NATURE OF INJURY:	TIME OF ACCIDENT	
WAS EMPLOYEE DOING REGULAR WORK?	WAS FIRST AID GIVEN?	
WITNESS:	TOOL/EQUIPMENT/THING CAUSING DAMAGE?	
EMPLOYEE'S BRIEF STATEMENT, HOW DID THE ACCIDENT HAPPEN?		
WITNESS(S) BRIEF STATEMENT, HOW DID THE ACCIDENT HAPPEN?		
WHAT WILL YOU DO TO PREVENT A RECURRENCE OF THIS TYPE OF ACCIDENT?		
WHEN WILL YOU DO THIS (Give Date)		
DATE (mo., day, yr.)	DEPARTMENT	SIGNATURE OF DEPARTMENT MANAGER

KEMPNER WATER SUPPLY CORPORATION

Quarterly

SAFETY ANALYSIS

The Company losses, accident investigations, inspection reports, and safety meeting topics were reviewed on the dates shown below with results as indicated.

<u>ITEMS REVIEWED</u>	<u>REVISION(S) MADE</u>		<u>INITIALS</u>	<u>DATE</u>
<u>Recordkeeping</u>	YES	NO	_____	_____
<u>Safety Training</u>	YES	NO	_____	_____
<u>Safety Inspection</u>	YES	NO	_____	_____
<u>Accident Investigation</u>	YES	NO	_____	_____
<u>Program Review</u>	YES	NO	_____	_____
<u>Losses</u>	YES	NO	_____	_____
<u>Trends</u>	YES	NO	_____	_____

List Revisions or Recommendations for Improvement and Completion Dates:

KEMPNER WATER SUPPLY CORPORATION
ANNUAL SAFETY PROGRAM REVIEW

The Company safety program was reviewed on the dates shown below with results as indicated.

<u>ITEMS REVIEWED</u>	<u>REVISION(S) MADE</u>		<u>INITIALS</u>	<u>DATE</u>
<u>Management</u>	YES	NO	_____	_____
<u>Analysis</u>	YES	NO	_____	_____
<u>Recordkeeping</u>	YES	NO	_____	_____
<u>Safety Training</u>	YES	NO	_____	_____
<u>Safety Inspection</u>	YES	NO	_____	_____
<u>Accident Investigation</u>	YES	NO	_____	_____
<u>Program Review</u>	YES	NO	_____	_____
<u>Losses</u>	YES	NO	_____	_____
<u>Trends</u>	YES	NO	_____	_____

List Revisions or Recommendations for Improvement and Completion.