

A.W.A.I.R.

A WORKPLACE ACCIDENT AND INJURY REDUCTION

PROGRAM

2015

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A Letter from the CEO

At Marsden Services, people are our most important resource, and their safety is our primary responsibility. We are dedicated to assuring that all of our clients and all of our associates have a safe and healthy work environment. Everyone at Marsden Services must:

- Work safely
- Identify and report unsafe acts or conditions
- Accept personal responsibility for the safety of others

Safety is the cornerstone of our commitment to excellence. Our goal is *zero* accidents and *zero* injuries.

As we have learned over the years, setting the safety goal is only the beginning. Our Workplace Accident and Injury Reduction Program is a detailed document with program elements that set out activities to be undertaken by all areas of our company. Everyone will contribute.

At Marsden Services, I expect management to take ownership of workplace safety and lead by example through proactive safety audits, hazard evaluation and implementation of controls that will avoid accidents and prevent injuries. Both management and associates will be involved in a safety partnership, as one is not effective without the other.

The key to a successful safety program lies in everyone's willingness to accept and carry out his or her safety responsibilities before the accident occurs. Each associate must ensure a safe working environment for everyone by accepting responsibility for their own personal actions and the actions of others. We all must recognize and report all unsafe work practices or unsafe conditions immediately, so that corrective actions are taken. Safe behavior will be recognized and rewarded, while at-risk behavior will be identified and eliminated.

At Marsden Services, I expect both management and associates to share the belief that safety is an everyday concern and integral part of every operation. We count on all members of Marsden Services to do their part to reduce hazards and eliminate accidents.

Guy C. Mingo, CEO
Marsden Holding, LLC

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Section 1: Introduction

Safety starts with us. We are dedicated to assuring that all of our clients and all of our associates have a safe, secure and healthy work environment. This is an important part of our overall mission.

Our safety mission is the foundation of our commitment to excellence. To accomplish it we have two expectations:

- We expect that everyone at Marsden Services, LLC will continuously pursue our goal of *zero* accidents and *zero* injuries. It is essential that **nobody gets hurt**.
- We expect that our safety process will enhance our reputation and help us to achieve our business objectives of increased market share, increased revenue and increased retention.

...and four commitments:

- We will work safely.
- We will identify and report unsafe acts or conditions.
- We will accept personal responsibility for the safety of others.
- We will follow Marsden Services' Cardinal Rules for Safety

These expectations and commitments start with me. I practice what is expected of us all, and you can take your cue from me. We will not just say we value safety; we will practice safety, and then let the facts demonstrate we value safety. Our record will be measured every day, with every associate, at every location, and within every department. Because safety is truly first, that fact will be evident.

This mission is consistent with our reason for existing. It gives us strength and serves as a guide along the path to excellence.

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Section 2: Safety Mission, Goals and Objectives

Safety 1st Mission

Marsden Services is dedicated to ensuring that our clients and our associates are provided a safe and healthy work environment.

This commitment is based on the principle that as professionals our managers and associates will not practice or tolerate unsafe behaviors. Safe behavior will be recognized and rewarded while at-risk behavior will be identified and eliminated.

At Marsden Services, both management and line associates share the belief that safety is an everyday concern.

Marsden Services' Safety Process is based on the belief that each associate must:

- Work safely.
- Identify and report unsafe acts or conditions.
- Accept personal responsibility for the safety of others as they accept it for themselves.
- Follow all of Marsden Services' Cardinal Rules for Safety

The key to a successful safety program lies in every associate's willingness to accept and carry out his or her safety responsibilities before the accident occurs.

Marsden Services Cardinal Rules of Safety

As a Marsden Services associate, I will:

1. Meet the company's safety goal of providing our clients and our associates a safe and healthy work environment.
2. Understand and use required personal protective equipment (PPE) **at all times**.
3. Use only the products/equipment that I have been assigned and trained to use as part of my job duties.
4. Immediately report and document to my Manager all recognized workplace hazards.
5. Immediately report and document to my Manager all job-related injuries, illnesses, accidents or near misses.
6. Report for work rested, alert and physically fit to perform job duties.
7. Obey all company and client safety policies, rules, and regulations.
8. Perform professionally by working safely and not endangering others or myself.

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Safety 1st Goals and Objectives

The ultimate goal of our safety program is zero accidents and zero injuries.

Our 2015 goals and objectives are intended to help us make progress towards achieving our ultimate goal.

2015 Goal #1:

Marsden Services will maintain a company culture that is committed to providing our clients and associates a safe and healthy work environment, eliminating unsafe conditions and unsafe work practices and developing safe work habits.

2015 Goal #1 Objectives:

- A. We will conduct regularly scheduled safety meetings:
 - Corporate-level Safety Leadership Committee meetings will be held monthly on the second Tuesday of every month.
 - Business Unit-level or Route-level safety meetings will be held on a regular basis.
 - Job-level Safety Committee meetings will be held on a regular basis at large job having more than 20 associates and will include cleaning associates.
 - In jobs having an on-site manager, Safety Briefings will be delivered to all associates weekly by the associate's immediate lead, supervisor or manager using an interactive approach. The purpose of the briefings is to help keep safety at the front of everyone's mind and to involve everyone in achieving our goals.
- B. Managers will actively enforce all safety rules throughout the company.
- C. We will apply annually each January for the Minnesota Safety Council's "Governor's Workplace Safety and Health Awards" program attempting to be recognized for Meritorious, Outstanding or Honorable Achievement in occupational safety for janitorial services companies.

2015 Goal #2:

We will reduce by 50% our number of recordable injury DART cases (cases with Days Away from work, job Transfer or Restrictions) and our number of total days away from work compared to 2012.

2015 Goal #2 Objectives:

- A. All associates will receive annual Injury Prevention training in the subjects of:
 - Rules for Safe Lifting
 - Preventing Sprain & Strain Injuries
 - Preventing Slip, Trip and Fall (from the Same Level) Injuries
- B. Associates will be reminded to recognize, correct if possible and report workplace safety hazards as part of their weekly safety briefings.
- C. Managers will receive training on how to recognize and safeguard common workplace hazards.

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- D. We will complete an Accident Investigation or Alternative Incident report following all injury, vehicle damage and near-miss incidents and take immediate corrective action to prevent a recurrence.
- E. We will make our associates aware of the Near Miss / Process Improvement form and teach them how to use it to help prevent future injuries.

2015 Goal #3

We will maintain at one (1) the average number of days required for reporting all injuries to Broadspire.

2015 Goal #3 Objectives:

- A. Managers will have easy access to the reporting requirements policy, related documents on eHub and our Cardinal Rules/24-Hour Reporting badges.
- B. Managers will receive frequent reminders in Route meetings about the importance of this goal and how it affects our other safety goals.

2015 Goal #4

We will achieve a minimum 70% completion rate for the following safety training courses: Hazard Communication/Right-to-Know; Bloodborne Pathogen; Injury Prevention and Defensive Driving.

2015 Goal #4 Objectives:

- A. Managers required to conduct these training courses will attend an annual Marsden Services Train-the-Trainer course.
- B. A quarterly training compliance progress report will be prepared and discussed in the Safety Leadership Committee meetings.
- C. New methods will continue to be developed with the goal of making training easier to deliver to associates in the field.

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Section 3: Roles and Responsibilities

Everyone's Responsibilities:

- Meet the company's safety goal of providing Marsden Services' clients and associates a safe and healthy work environment.
- Understand and use required personal protective equipment (PPE) at all times.
- Use only the products/equipment they've been assigned and trained to use as part of their job duties.
- Immediately report and document to their manager all recognized workplace hazards.
- Immediately report and document to their manager all job-related injuries, illnesses, accidents or near misses.
- Report for work rested, alert and physically fit to perform job duties.
- Obey all company and client safety policies, rules, and regulations.
- Perform professionally by working safely and not endangering others or themselves.

Shift Lead and Supervisor Responsibilities:

- Conduct Daily Safety Briefings and discuss any current safety issues with their associates at the beginning of all scheduled shifts.
- Report to their supervisor or manager any safety hazards or safety concerns noted by their associates.
- Follow up on safety hazards or safety concerns by informing their associates about hazards which have been safeguarded.
- Ensure their associates have a safe work environment by contacting the Marsden Services Safety Manager about any hazards not safeguarded.

Account and Area Manager Responsibilities:

- Conduct Daily Safety Briefings and discuss any current safety issues with their associates at the beginning of all scheduled shifts.
- Train all associates in account hazards and safeguards based on the requirements of the Minnesota Employee Right-to-Know Act.
- Determine and issue disciplinary action in situations of Marsden Services policy or procedure violations.
- Ensure all client site-specific training for associates is completed on time and documented properly.

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- Address all safety hazards or concerns raised by associates by:
 - Investigating the situation
 - Determining if the safety concern is valid, and
 - Working with the Marsden Services Operations Manager and our clients to develop appropriate safeguards for site-specific hazards whenever necessary.
- Ensure their associates have a safe work environment by contacting the Marsden Services Safety Manager about any hazards not safeguarded.
- Upon report of an injury, a vehicle damage or a near-miss incident:
 - Determine the appropriate Marsden Services Injury and Illness Management Program application.
 - Ensure the proper notification process occurs for both Marsden Services and client.
 - Follow up to complete all required paperwork in a timely manner.

Operations Manager Responsibilities:

- Ensure Associates working in their Business Unit:
 - Know and are in compliance with all regulatory agency requirements for work performed in their Business Unit.
 - Know, understand and follow all requirements of the Marsden Services AWAIR Program.
- Determine and issue disciplinary action in situations of Marsden Services policy or procedure violations.
- Work with Marsden Services Account/Area Managers and our clients to develop appropriate safeguards for site-specific hazards whenever necessary.
- Ensure their associates have a safe work environment by contacting the Marsden Services Safety Manager about any hazards not safeguarded.
- Inform the Marsden Services Safety Manager of any new site-specific safety hazards or regulatory agency requirements as soon as they're made aware of them.

Safety Coordinator Responsibilities:

- Manage all injury, illness and vehicle damage cases.
- Review all First Report of Injury, Vehicle Accident and Accident Investigation Reports with Marsden Services' Safety Manager.
- Compile and maintain Company and OSHA required data on all injury, illness and vehicle damage cases

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Safety Manager Responsibilities:

- The Safety Manager will lead Marsden Services':
 - AWAIR Program
 - Injury and Illness Management Program
 - Safety Leadership Committee
 - Regulatory agency compliance efforts
- Review all First Report of Injury, Vehicle Accident and Accident Investigation Reports with Marsden Services' Safety Coordinator.
- Conduct Root Cause Analysis of First Report of Injury, Vehicle Accident and near miss incidents as determined by their severity, frequency and risk and forward findings to the Safety Leadership Committee.
- Provide content for all safety training required by regulatory agencies, clients or Marsden Services management.
- Recommend improvements in engineering controls, administrative controls or personal protective equipment to the Safety Leadership Committee.
- Ensure associates have a safe work environment by addressing any associate concerns regarding hazards not safeguarded.

President and COO Responsibilities:

- Communicate to all associates the importance of safety and health throughout Marsden Services.
- Lead by example in following all safety policies and procedures.
- Recognize and reward excellent performance.
- Review all safety concerns brought by the Operations Managers, the Safety Leadership Committee or Safety Manager and take appropriate action.
- Review Marsden Services' AWAIR program on an annual basis.

Safety Leadership Committee Responsibilities:

- Conduct monthly meetings to:
 - Review Lag-Time and Injury Summary reports and track results against goals. Review injury, vehicle damage, accident investigation and near miss incident reports.
 - Address outstanding safety hazard concerns reported by associates.
 - Determine disciplinary action in situations of Marsden Services policy or procedure violations.
- Communicate new information from its meetings to the Safety Captains in each Business Unit or Route.
- Review reports and provide guidance to the Business Unit or Route Safety Committees.
- Develop Safety Best Practices using knowledge gained from its monthly meetings.
- Review Marsden Services' AWAIR Program on an annual basis.

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Section 4: Hazard Identification, Analysis and Control

Marsden Services' Safety Department members will receive training and certification as instructors in hazard identification, analysis and control. Members will also receive training in these subject areas:

OSHA General Industry Verbal Judo/Crisis Intervention
Defensive Driving Root Cause Analysis
Risk Management/Loss Control Safety Training Methods

Marsden Services' managers will receive training in hazard identification and control and safety training methods through Marsden Services' New Manager Orientation (NeMO) training program and through annual refresher training provided by the Safety Department.

Marsden Services' general cleaners will receive training in identifying and reporting workplace safety hazards prior to their initial assignment and as part of their daily safety briefings. Employee Right-to-Know refresher training will be conducted annually. Additional training will occur based on site-specific hazard analysis conducted:

- During our contract bidding process
- Annually during our contract renewal process
- Whenever physical or procedural changes at the job site result in new safety hazards being present

Site-specific hazard identification and development of proper site-specific controls will require collaboration between clients and Marsden Services. Operations Managers will be responsible for this collaboration including:

- Cleaning and Safety procedures development
- Regulatory agency requirement compliance
- Industrial hygiene monitoring
- Training associates on site-specific safety hazards

Any site-specific unsafeguarded hazards and unresolved safety and health concerns will be sent to the Marsden Services Safety Leadership Committee and President for decision-making.

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Methods of Hazard Identification:

1. Prior to each new account start-up a site walkthrough will be conducted by:

- The Marketing Executive (all jobs)
- The Operations Manager (all jobs)
- The Safety Manager (all medical, industrial/manufacturing and K-12 school jobs)

Procedures for controlling hazards at new accounts will include using a Risk Assessment form for documenting any hazards found on the walkthrough.

2. During day-to-day operations:

- Associates will follow Company safety rules requiring they observe and report any safety hazards during their shift.
- Managers, Supervisors and Shift Leads will review associates' reports of safety hazards on a daily basis and take appropriate action to safeguard any hazards.

3. During annual review:

- A review will be conducted of Company-wide incidents by the Safety Manager to determine if incidents occurred due to uncontrolled hazards, improper safeguards or inattention by associates.
- Refresher training on Hazard Communication and Employee Right-to-Know will occur for all managers and associates.

Methods of Hazard Analysis:

Marsden Services will follow the Occupational Safety and Health Administration (OSHA) guidelines for job hazard analysis. Cleaning jobs are grouped into appropriate hazard classifications and evaluated accordingly. Sample classifications:

General Office	Education
Medical/Dental	Industrial/Manufacturing

Methods of Hazard Control:

Hazard controls will be established at the job-sites and be based on statutory regulations and the results of our hazard analysis. Categories of controls will be based on the State of Minnesota OSHA or branch state Federal OSHA requirements:

- Engineering controls
- Administrative controls
- Personal protective equipment

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Section 5: Communication

All Marsden Services associates will receive safety awareness training. This training will occur:

Upon Hire by:

- A review of Marsden Services' Cardinal Rules of Safety
- Signing of the Safety Pledge
- Completion of Employee Right-to-Know training

Ongoing through:

- Daily Safety Briefings

Annually by:

- Employee Right-to-Know refresher training

Managers will receive additional Safety Training. This training will occur:

- Prior to promotion to a management position through New Manager Orientation (NeMO) Training
- Ongoing through monthly management meetings
- Ongoing through additional web-based modules available on our learning management site such as Marsden Services University.

Additional means of communicating safety awareness will be:

- Associate Handbook
- Account Procedure Manuals
- Daily Safety Briefings

Recognition for exemplary safety performance will occur quarterly as part of Marsden Services' Star Service Recognition program. Recognition will include:

- "Star Service Award for Outstanding Safety Leadership"
- "Star Service Award for Outstanding Safety Performance"
- Certificates for sites with zero accidents and zero injuries in over 200,000 hours of work.
- Certificates for sites with challenging circumstances over the previous year having zero accidents and zero injuries.

Effective communication is critical to success at all Marsden Services sites. Cleaners will be selected and trained based on their ability to effectively receive and understand spoken information.

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Section 6: Incident Investigation

All Marsden Services incidents will be investigated. The goal of every incident investigation will be to determine causes and establish safeguards to prevent further incidents.

Incidents are defined as:

- An injury or illness to a Marsden Services associate while on duty
- Damage to a Company vehicle or equipment
- Damage to any vehicle, equipment or property on the client's site
- Near-miss events or other safety-related occurrences outside the normal course of daily activity. Near-miss events are defined as incidents where no property was damaged and no personal injury sustained, but where, given a slight shift in time or position, damage and/or injury easily could have occurred.

All incidents must be documented in a timely manner through the use of required forms or reports.

The Safety Coordinator must receive First Reports of Injury and Incident Reports by no later than the start of the next business day. The Marsden Services Safety Manager, upon evaluation of the reports, will direct that a root cause investigation occur or record the on-site incident investigation information in a database for trending.

A member of the Safety Department certified in root cause analysis will lead the investigation. Additional participants will be:

- The Risk Manager
- The Director, Route or Account Manager of the involved Department

The associate(s) involved in the incident will contribute to the investigation.

Investigations will follow TapRoot format and indicate:

- Time Line including events and conditions
- Safeguards bypassed
- Causal factors
- Root cause
- Corrective action
- Follow-up responsibilities

Action plans will be approved and signed by the responsible operations manager and Marsden Services, LLC President.

Any action plans involving client participation will be addressed through the direction of the Marsden Services, LLC President.

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Section 7: Enforcement of Safety and Health Programs

Enforcement of safety rules and safe work practices will occur based on statutory requirements and established policy. Enforcement will be fair and consistent throughout Marsden Services.

At Marsden Services, everyone will know their responsibilities:

- Management will create a safe work environment and be aware of the example they set for the workforce.
- Cleaners will act in a safe manner, follow all safety policies and observe, report and document any hazards noted at their sites.

At Marsden Services, everyone will be trained on:

- Our Safety Mission, Goals and Objectives
- Marsden Services' Cardinal Rules for Safety
- Understanding site-specific hazards
- Applying safeguards through engineering controls, administrative controls and personal protective equipment

Consequences for failure to follow statutory requirements and company policy are spelled out in the Marsden Services Associate Handbook. Marsden Services' commitment to safety indicates disciplinary action will occur for violations of safety rules. This disciplinary action will include:

- Verbal warning
- Written warning
- Suspension
- Termination

Any associate found responsible for an injury to another or to themselves may receive disciplinary action up and including termination.

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Section 8: Program Review

The Minnesota AWAIR Act requires employers to review their entire program at least annually and document the findings. Annual program review is vital, because it serves as a check to see if the organization is making progress towards its goal of creating a safer, healthier workplace for all associates.

The annual review process will include:

- Annual statistics review:
 1. OSHA 300 Log
 2. Recordable and Lost Time incidents by Business Unit
 3. Business Unit incident rate comparison to janitorial services industry average
- Annual training program review:
 1. Pre-assignment orientation
 2. New Manager Orientation (NeMO) training
 3. Injury and Illness Management Program
 4. Daily Safety Briefings
 5. OSHA General Industry Modules on a site-specific basis

In addition to the AWAIR program annual review a monthly review of Recordable and Lost Time Injuries will be conducted by business unit and the results reported to the Safety Leadership Committee. This purpose of the monthly review will be to analyze the data for developing trends and apply proper safeguards.

A review of specific injury incidents will occur at the direction of the Safety Manager. Results of these reviews, such as root causes and contributing factors, will be reported to the Safety Leadership Committee and applied to the Marsden Services AWAIR program.

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Section 9: Safety Committee

Minnesota Statutes §182.676 requires all employers with more than 25 employees “establish and administer a joint labor-management safety committee.” The statutory requirements for these committees are straightforward:

1. The safety committee must hold regularly scheduled meetings unless otherwise provided in a collective bargaining agreement.
2. Employee safety committee members must be selected by employees.

An active, trained safety committee can be an important tool for implementing an effective AWAIR program. Duties that safety committee members assume include:

- participating in safety inspections
- training new associates regarding safe working procedures
- performing job hazard analyses
- providing input for the creation of workplace safety and health rules
- presenting safety and health information at regularly scheduled staff meetings
- assisting in accident investigations and
- bringing employee safety and health concerns and complaints to supervision and management for review.

Marsden Services’ safety committees will be formed by business unit. Membership will include:

- The business unit operations manager
- Account and area managers selected by the business unit manager
- Associates selected by their fellow associates and approved by the business unit operations manager.

Business unit safety committee meetings will be held regularly and relevant information will be reported to the Safety Leadership Committee.

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Section 10: Safety Commitment

I pledge to:

- Work safely.
- Identify and report unsafe acts or conditions.
- Accept personal responsibility for the safety of others as they accept it for themselves.
- Follow all Cardinal Rules for Safety

Signed: _____ Emp. #: _____ Date: _____

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Section 11: Attachments for Program Elements

- 1. Annual Compliance Re-Training**
- 2. Break Times and Break Procedures**
- 3. Continuing Education Unit Training**
- 4. Employee Right-to-Know and Hazard Communication**
- 5. Hazard Analysis**
- 6. Housekeeping**
- 7. Management Safety Training**
- 8. Pre-Assignment Safety Training**
- 9. Procedure Manuals/ Emergencies**
- 10. Safe Work Practices**
- 11. Substance Abuse**

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Section 12: Attachments for Site-Specific Program Elements

- 12. Aerial Lift Training Guidelines
- 13. Asbestos Awareness
- 14. Bloodborne Pathogen Program
- 15. Confined Spaces
- 16. Defensive Driving
- 17. Fall Protection
- 18. Heat and Cold Stress
- 19. Personal Protective Equipment (PPE)
- 20. Respiratory Protection
- 21. Scaffolding and Ladder Safety
- 22. Vehicle Policy

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