

**COMPANY**  
**HEALTH & SAFETY**  
**MANUAL**  
**January 9, 2006**

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## **Corporate Safety Policy**

The personal safety, health and protection of each employee is of primary importance to CES Member companies (herein in referred to as “the company”). Safety and health in our business must be a part of every operation. To avoid distress and financial loss to personnel and the company, the company will follow a program of health and safety that is consistent with the best practices in our industry. Our rules and practices are also consistent with local law, state and federal guidelines.

The commitment to the safety program by our company must be firm, aggressive and transmitted to all personnel in every aspect of work. To assure favorable results, the company must consider accident prevention both necessary and economically feasible. The company will provide all mechanical and physical safeguards, as well as training, required for personal safety and health in keeping with the highest standards.

For this program to be successful, the employees must also be responsible for recognizing that safety and accident prevention is an essential part of their every day work processes. To do this, we must follow all rules of safety established for your protection and constantly be aware of conditions in all work areas that can produce injuries, on and off our premises. No employee is required to work at a job they know is not safe or healthful. It is expected that once an unsafe or unhealthy situation is recognized, the condition will be reported and corrected.

Our objective is a safety and health program that drives us toward zero accidents and injuries.

## **Section 1 - Injury and Illness Prevention Program**

### **Safety First Priority**

The personal safety and health of each employee of the company is of primary importance. Prevention of occupationally-induced injuries and illnesses is of such consequence that it will be given precedence over operating productivity. To the greatest degree possible, management will provide all mechanical and physical protection required for personal safety and health, but our employees must bear primary responsibility for working safely. Common sense and caution can prevent most accidents from occurring.

### **Safety Program Goals**

The objective of the safety and health program at the company is a program that will keep occurrence of accidents and injuries to a minimum. Our goal is zero accidents and injuries.

### **Safety Policy Statement**

Accident prevention shall be considered of primary importance in all phases of operation and administration. It is our intention to provide safe and healthy working conditions and to establish and insist upon safe practices at all times by all employees.

The prevention of accidents is an objective affecting all levels of our company and its operations. Each employee must accept and follow established safety regulations and procedures. Unsafe conditions must be reported immediately.

Every injury that occurs on the job must be reported as soon as possible. At such time, a report may be required in accordance with OSHA guidelines.

### **Safety Guidelines for All Employees**

Safety is a cooperative undertaking requiring an ever-present safety consciousness on the part of every employee. To carry out this policy, these guidelines shall be followed:

1. Employees shall report all unsafe conditions or practices.
2. The company shall be responsible for implementing these policies by insisting that employees observe all safety guidelines necessary to maintain a safe workplace and safe work habits and practices.
3. Good housekeeping should be practiced in the work area. Clean up wastes and eliminate dangers in the work area.
4. Clothing and footwear shall be worn which is suitable for the work being performed. This may include steel toes, hardhats, eye protection, gloves, etc. as would be appropriate for the conditions at hand.

5. Personnel shall not be permitted to perform work if abilities or judgment is impaired by the use of alcohol, drugs including prescription drugs, fatigue, illness or other causes.
6. Horseplay, scuffling, and other acts which tend to have an adverse effect on safety are prohibited.
7. Safe and proper lifting techniques shall be used.

### **Agreement to Participate**

Every employer is required by law to provide a safe and healthful workplace. Every company employee is required to be aware of and understand the guidelines in this manual and to adhere to them.

### **Records**

The company will maintains records of employee training, hazard identification and abatement, and accident investigation.

### **OSHA Records Required**

Copies of required accident investigations and employee safety training shall be maintained by the company. A written report will be maintained on each accident, injury or on-the-job illness requiring medical treatment. A record of each such injury or illness is recorded on the OSHA Log and Summary of Occupational Injuries Form 200 according to its instructions. Supplemental records of each injury are maintained on OSHA Form 101, or Employers Report of Injury or Illness Form 5020. Every year, a summary of all reported injuries is posted no later than February 1, for one month, until March 1, on OSHA Form 200. These records are maintained for five years from the date of preparation.

### **Emergencies**

It is every employee's responsibility to know the locations of the emergency equipment. This includes first aid stations, fire extinguishers, alarms, etc. In the event of an emergency, contact the proper authority.

## **Section 2 - General Code of Safe Work Practices**

### **Compressed Air Systems**

Compressed air receivers should be periodically drained of moisture and oil.

Appropriate eye and ear protection shall be used when using compressed air or air operated tools.

### **Electrical**

Employees are expected to make preliminary inspections and conduct appropriate tests to determine conditions before starting any electrical work. Lockouts should be used when possible.

Equipment such as electrical tools or appliances must be grounded. Extension cords being used must have a grounding conductor.

Exposed wiring and cords with frayed or deteriorated insulation must be repaired or replaced.

All energized parts of electrical circuits and equipment must be guarded against accidental contact by means of cabinets or enclosures.

### **Fire Safety**

During the use of hot work (torch, welding, etc.) a fire extinguisher must be readily available.

Exits must be maintained in good operating condition and should be kept unobstructed.

Portable fire extinguishers are provided in adequate number and are located throughout the facility. They shall be periodically inspected and recharged. Report if any problems are suspected with any fire protection equipment or fire hazards are evident.

### **Forklifts, Man-Lifts**

Only trained personnel should be allowed to operate forklifts/man-lifts.

### **Hand Tools**

Employees are responsible for ensuring that tools and equipment used by them and other employees at the workplace are in good condition. Hand tools such as chisels, punches, etc. which develop mushroom heads during use, must be reconditioned or replaced as necessary.

Broken or fractured handles on hammers and similar equipment must be replaced promptly.

Worn or bent wrenches should be replaced regularly.

Appropriate handles must be used on files and similar tools.

### **Hazardous Chemicals**

Material Safety Data Sheets (MSDSs) are available and accessible to all employees. Personnel should be aware of hazards and necessary safety precautions for all chemicals with which their work is involved.

All equipment received in for service is required to be decontaminated prior to receipt and we must be provided with an MSDS. If an MSDS is not available, work should be stopped until an MSDS is available and appropriate safety precautions can be taken.

### **Hoists, Chain Falls, and other Lifting Devices**

Do not work under suspended loads.

All lifting devices should be periodically inspected for damage. If a damaged lifting device is identified, it should be repaired or replaced immediately. Securing chains, ropes, chokers, or slings must be adequate for the job to be performed.

### **Machine Guarding**

Machine guarding shall be maintained in proper working order. Equipment shall not be operated without the proper safety guards in place.

### **Material Handling**

Motorized vehicles should be inspected before use.

Hand trucks must be kept in safe operating condition.

### **Personal Protective Equipment**

Where there is a danger of flying particles or chemical hazards, employees must wear appropriate eye protection such as goggles or face shield.

Employees are required to wear safety glasses at all times in areas where there is a risk of eye injuries such as punctures, contusions or burns.

Employees are required to wear protective gloves, aprons, shield and other means provided in areas where they may be subject to cuts, corrosive liquids and/or harmful chemicals.

Hard hats must be worn in areas subject to falling objects, and at all times while required on-site by the customer.

Appropriate footwear including steel toed shoes must be worn in an area where there is any risk of foot injuries from hot, corrosive, falling or crushing objects.

Ear protection is available and required when high noise levels are excessive.

### **Power Tools**

Check tools before use. Appropriate safety guards must be in place.

### **Safety Audit**

From time to time, and in the event of an accident, a safety audit will be performed. During these audits, you may be asked questions about workplace safety related to the incident so that we can help to prevent similar incidents in the future. Please answer any questions you are asked honestly and completely. Additionally, you are encouraged to volunteer any personal observations and/or suggestions for improved workplace safety.

In the event of an accident, an accident report will be prepared and will address the following:

1. What happened?
2. Why did the accident occur?
3. What should be done? This is an outline of corrective actions to be taken.
4. What has been done? This is a follow up and review of corrective actions.

### **Safety Meetings**

Unless required more frequently to address a particular issue, the company will hold quarterly safety meetings. The purpose of these meetings is to convey safety information and answer employee questions as they relate to safety in the workplace.

### **Smoking**

Smoking is not permitted inside the facility or in company vehicles.

### **Vehicles**

All federal, state, and local laws must be followed in company vehicles. Company vehicles shall be kept in safe operating order.

Company vehicles shall remained locked when not in attendance.

### **Walkways**

All aisles and passageways must be kept clear

### **Welding, Cutting and Brazing**

Compressed gas cylinders should be regularly examined for obvious signs of defects. Use care in handling and storing cylinders, safety valves, etc. to prevent damage. Precaution must be taken to prevent mixture of air or oxygen with flammable gases, except at a burner or in a standard torch. Only approved apparatus (torches, regulators, pressure-reducing valves, manifolds) may be used.

Cylinders must be kept away from sources of heat. Do not use cylinders as rollers or supports. Empty cylinders must be tagged, valves closed, and valve protection caps on. Care must be taken not to drop or strike cylinders.

Welding electrodes must be removed from the holders when not in use. All electric power to the welder must be shut off when no one is in attendance. Do not coil or loop welding leads around the body.

Suitable fire extinguishing equipment must be available for immediate use before starting hot work. Shields should be used to confine heat, intense light, and/or sparks. Appropriate eye protection, gloves, apron, etc. must be used for the specific job. Adequate ventilation must also be present.

### **Work Environment, General**

Work areas must be kept clean and orderly. Waste should be disposed of in a timely and appropriate manner. Fire extinguishers must remain accessible at all times. Proper lifting techniques and equipment are to be used by employees to avoid strain when lifting or carrying loads.

### **Section 3 – Emergencies**

We require that, during an emergency, an organized effort be made to protect personnel from further injury and to minimize property damage. Each employee should know what is to be done in the event of an emergency.

#### **Emergency response plan**

Response to an emergency, if deemed necessary, may include support from local Fire, Medical, Protective Services and other support organizations.

In the event of an emergency, each employee has a vital role and a basic responsibility in the area of safety and emergency action. The initial response to any emergency will be at the individual level. Don't be afraid to call outside assistance like police and fire fighters. Dial 911. When police, fire fighters or paramedics arrive, surrender command to the appropriate qualified emergency specialist. Notify management as soon as practical, which means after all immediate responses have been exercised.

#### **Senior Personnel Responsibilities**

Senior personnel must:

Ensure that those under their supervision are familiar with emergency plans and plans for the building, particularly the recommended exit routes and how to report an emergency.

Render assistance to the person in charge during an emergency, as required.

Maintain familiarity with shutdown procedures for all equipment used by those under his or her supervision.

Know the location and use of safety equipment.

Keep employees from reentering an evacuated area until reentry is safe.

## **Chapter 4 – Fire Safety**

All employees must conduct their operations in such a way as to minimize the possibility of fire. This means applying rules such as keeping combustibles separated from ignition sources, being careful about smoking and avoiding needless accumulation of combustible materials.

The company is responsible for keeping operating areas safe from fire, including the provision and maintenance of fire detection systems and manual fire extinguishing equipment. The company must ensure that all personnel are properly instructed regarding potential fire hazards involved in their work and around their workplaces, the proper precautions to minimize fires and the procedures in case of fire.

The company mandates practices that minimize the possibility of fire and minimize damage from a fire should one occur such as:

- Disposing of waste daily.
- Keeping work areas clean and free of fuel paths, which can spread a fire, once started.
- Keeping combustibles away from accidental ignition sources such as hot plates, soldering irons or other heat or spark producing devices.
- Keeping all rubbish, trash or other combustible waste in metal or metal-lined receptacles with tight fitting covers when adjacent to buildings.
- Using safe ash trays for disposal of smoking materials and making sure that contents are extinguished and cold to the touch before emptying them into a safe receptacle.
- Planning the use of combustibles in any operation so that excessive amounts need not be stored.
- Storing dirty rags in metal bins with automatically closing lids.
- Using only approved containers, tanks, equipment and apparatus for storage, handling and use of combustibles as appropriate for the class of combustibles at issue.
- Storing, handling and using of combustibles only in approved locations, appropriate for the class of combustibles at issue.
- Having fire extinguishers and exit corridors and doorways clearly marked and readily accessible.
- Assuring that all exits are free of obstructions and clear of combustible materials.

- Assuring that construction areas under control of the company or outside contractors we are working with are maintained in a fire safe condition and accessible to emergency response forces.
- Assuring that emergency lighting is installed and operational to allow for positive identification of exit aisles, corridors and doorways in the event of a power failure.
- Making frequent inspections for noncompliance of these rules in order to catch fires in the potential stage.

## **Chapter 5 – Gases**

All gases must be used in a manner that will not endanger personnel or property. Hazards associated with handling and use of flammable and/or high-pressure gases include the following:

1. Injuries caused by flying objects accelerated by an explosion or pressure release
2. Death if a flammable mixture is inhaled and then ignited
3. Asphyxiation
4. Secondary accidents such as falls or electrical shocks
5. Fire caused by ignition of flammable gases

Fire requires three elements: fuel oxygen and ignition. Any operation that places a flammable gas in the presence of an oxidant (air, oxygen) and an ignition source (spark, flame, high temperature) is extremely dangerous. To reduce the risk of fire, eliminate two of these three elements. Thus, when using flammable gases, eliminate ignition sources and prevent mixing of fuel with air or oxygen.

### **Cylinders**

Only cylinders meeting Department of Transportation (DOT) regulations may be used for transporting compressed gases. Each cylinder must bear the required DOT label for the compressed gas contained, except under certain specified conditions set forth in DOT regulations.

The cylinder-valve outlet connections on cylinders containing gas mixtures are provided by the gas supplier, based on the physical and chemical characteristics of the gases. Gas mixtures having a flammable component must have a cylinder-valve outlet connection with left-handed threads, even though the gas mixture is nonflammable.

Regulators, gauges, hoses and other appliances provided for use with a particular gas or group of gases must not be used on cylinders containing gases having different chemical properties unless information obtained from the supplier indicates that this is safe.

Vendor-owned cylinders must not be used for any purpose other than as a source of vendor supplied gas. Only the vendor may pressurize these cylinders.

It is illegal to transport a leaking cylinder (charged or partially charged) by common or contract carrier.

All compressed gas cylinders, hoses, tubing and manifolds must be inspected frequently to ensure that they are free of defects that could cause a failure. Cylinders considered defective

must be removed from service and returned to the manufacturer or vendor for test and repair. Hoses and fittings that appear worn must be replaced before the equipment is put to further use.

Extreme care must be taken when handling compressed gas cylinders. Always assume that the cylinder is pressurized, keeping in mind that severe injuries, including death and property damage that can occur as a consequence of improper handling and use of compressed gas cylinders.

## **Section 6 – Protective Devices and Procedures**

The company will provide suitable equipment to protect employees from hazards in the workplace. Everyone should keep in mind that protective clothing is not a substitute for adequate engineering controls.

### **Protective Clothing**

Protective clothing will be provided to employees who work with hazardous materials for the purpose of protecting their health and safety.

The company encourages the use of protective shoes and will require them when employees are exposed to foot injuries from hot, corrosive or poisonous substances in the shop, in equipment handling or on construction jobs where there is a danger of falling objects, or in abnormally wet conditions. Open toed shoes are not permitted in the assembly areas, machine shop, repair shop or shipping and receiving departments.

The company will provide proper hand protection to employees exposed to known hand hazards.

The company will provide hard hats or appropriate head protection devices for employees to protect them from head injuries that could result from their working environment.

Suitable eye protection should be used by all employees in areas where an eye injury hazard exists. These areas may include machine shops while machines are running, assembly areas during production and shipping and receiving departments while crating and packaging are being performed.

Any operation that generates harmful airborne levels of dusts, fumes, sprays, mists fogs, smokes, vapors or gases or that may involve oxygen-deficient atmospheres requires the use of effective safety controls. Safety controls may consist of engineering control measures or the use of appropriate respiratory protection devices. All employees whose job functions may require them to use respiratory protective devices will be trained in the types, limitations and proper use of each such device.

### **Mechanical Guarding**

Guards must be provided on working equipment that encompasses both the power transmission and points of operation on production machines. Guards should be provided where rotational motion, nip points, cutting, shearing, punching and forming mechanisms can cause injury to personnel or damage to tools and equipment.

Guards must be considered a permanent part of the equipment, must be durable and capable of being easily removed for repair and/or replacement.

### **Lock Out / Tag Out**

When you have to perform maintenance on a piece of machinery, you should take these four steps, as a minimum, to help protect yourself and your co-workers from injury.

1. De-energize the machine, positively disconnecting the machine from its power source. If there is more than one source of power, disconnect them all.
2. If possible, lock out all disconnect switches. You must be given a lock and a key for each disconnect and put the lock in place before you begin working on the machine.
3. Tag all disconnect switches. Use Yellow or Red safety tags which state in large letters “DANGER – DO NO OPERATE” or its equivalent and gives the name of the individual who locked out the equipment, date and time. The tag must also state “DO NOT REMOVE THIS TAG”. The only person authorized to remove the tag is the person who placed it on the device and it may only be removed after the machinery maintenance has been completed.
4. Test the equipment to ensure that it is de-energized before working on it.

## **Section 7 – Material Handling**

### **Material Handling**

We require that safety planning and practices for commonplace tasks be as thorough as for operations with unusual hazards. Identifying obvious and hidden hazards should be the first step in planning work methods and job practices. Most of the items that follow in this section relate to commonplace mishandling of material.

### **Lifting and Moving**

Appropriate equipment must be used for lifting and moving of objects that may overtax the ability, physical condition or capability of the person doing the lifting or moving.

### **Rigging**

Responsibility for all customer site rigging jobs is shared between the employee and the customer. The riggers are responsible for final rigging and for carrying out whatever moves have been designated. Before any movement takes place, however, each representative must approve the rigging and other procedures associated with the intended move. Each must respect the responsibility and authority of the other to prevent or terminate any action he or she judges to be unsafe or otherwise improper.

The senior person must enforce the use of safe lifting techniques, maintain lifting equipment in good mechanical condition and be responsible to ensure that only those personnel who are qualified to use lifting devices and have been properly trained to do so are engaged in the lifting process.

All mechanical lifting and moving devices must be inspected periodically to ensure that it is in good working order. Defective equipment must be repaired or replaced and the rated load capacity of lifting equipment must not be exceeded.

### **Load Path Safety**

Load paths must be selected and controlled to eliminate the possibility of injury to employees. Equipment worked on while supported must have a redundant supporting system capable of supporting all loads that could be imposed by failure of the mechanical handling equipment. Suspended loads must never be left unattended but must be lowered to the working surface and the material handling equipment secured before leaving the load unattended.

Stairs, corridors, aisles, traffic lanes and loading areas should be kept clear and marked accordingly.

### **Storage**

Materials should be stored in proper work rooms or designated storage areas only. Do not allow exits, passageways or access to equipment to become obstructed by stored materials or equipment and materials that are being used. Arrange stored materials safely to prevent tipping, falling, collapsing, rolling or spreading – that is, any undesired and unsafe motion. Place materials such as cartons, boxes, drums, lumber, pipe and bar stock in racks or in stable piles as appropriate for the type of material. Store materials that are flammable, explosive, oxidizing, corrosive or pyrophoric only under conditions approved for that specific use. Segregate and store incompatible materials in separate locations.

A minimum clearance of 36 inches must be maintained around electrical power panels.

## **Section 8 – Noise**

Exposure to high levels of noise may cause temporary or permanent hearing loss. While temporary hearing loss occurs after a few minutes exposure to an intense noise and is recoverable following a period of time away from the noise, if the noise exposure is repeated, there may be only a partial hearing recovery and the loss can become permanent. Losses associated with aging are quite similar to those caused by excessive noise. Hearing impairment may also result from infections, tumors and degenerative diseases.

Exposure to continuous noise above 115 dBA is not permitted without ear protection.

Personnel must not be exposed to impact noises exceeding 140 dBA. Impact noises occur at intervals of greater than one per second.

Noise exposure can be reduced by considering:

- Proper design of new machines
- Modification of present machines
- Proper repair and upkeep of equipment
- Use of appropriate mufflers
- Use of vibration dampeners on machines

Noise transmission can be reduced by considering:

- Increased distances between noise and personnel exposed
- Construction of barriers between noise source and personnel
- Sound treatment of ceilings and walls

Noise exposure can be reduced by the following administrative procedures and protective equipment:

- Job schedule changes
- Personnel rotation
- Ear plugs
- Earmuffs

The company will provide a ready supply of new ear plugs for all employees to use. When required, protection can be multiplied by wearing of both ear plugs and and ear muffs simultaneously.

## **Section 9 – Safety Training**

The company will provide employees and visitors with appropriate health and safety training so they are fully informed about possible occupational health hazards and know how to work safely.

Health and safety training will be documented, including the names of attendees, topics discussed and the date the training took place.

**New employees** - Training will include a health and safety orientation for new employees plus any additional training specific to the nature of the hazards on the job. New employees must complete this training before they can work unsupervised. All new employees must attend the new employee orientation as soon as possible after their starting date.

**All employees** – Health and safety training will be an ongoing process with periodic updates and review of safety practices for all active employees. Training topics covered will be geared specifically to address the potential exposure to hazards likely to be encountered.

## **Section 10 – Tools**

The company will provide hand and powered portable tools that meet accepted safety standards. A damaged or malfunctioning tool must not be used but must be turned in for servicing and a tool in good condition should be obtained to complete the job. Employees must use the correct tool for the work performed. If an employee is unfamiliar with the operation of a particular tool, they must request and receive instruction before starting the job. The company will not permit the operation of any tools without proper training.

Equipment guards and protective devices must be used and must not be compromised.

Persons using machine tools must not wear clothing, jewelry or long hair in such a way as to represent a safety hazard.

**Grounding** – Tools that are not double insulated must be effectively grounded. Grounded tools must always be used with an effectively grounded circuit. Any extension cord used with a grounded tool must be a grounded type.

Electric powered hand tools used on construction sites, on temporary wired circuits or in wet environments will be used in conjunction with an approved ground fault circuit interrupter (GFCI).

Repairs of defective tools will only be made by qualified personnel.

## **Section 11 – Traffic and Transportation**

The company requires that an operator of any motor vehicle on the company's behalf hold a valid drivers license for the class of vehicle that he/she is authorized to operate. Persons intending to operate forklifts are required to have the appropriate training in their use prior to being permitted to use them.

### **Responsibility**

All drivers of company vehicles are responsible for reporting any damage or deficiency. Repairs, adjustments and maintenance can only be accomplished if the driver adequately documents and reports these items. Failure to report unsafe vehicle conditions can result in an accident.

### **Safety Belts**

Employees operating or riding in company furnished vehicles, or personal vehicles on official company business, are required to wear safety belts at all times. The driver should instruct the passengers to fasten their safety belts before operating the vehicle.

### **Accidents**

Any accident involving company vehicles (including private, rented or leased vehicles used on official company business) must be reported to the company. If the driver is unable to make a report, another employee who knows the details of the accident must make the report.

It is company policy that employees should not admit to responsibility for vehicle accidents occurring while on official business. It is important that such admissions, when appropriate, be reserved for the company and its insurance carrier.

The law requires that each driver involved in a vehicle accident must show his/her license on request by the other party. Be sure to obtain adequate information on the drivers involved as well as on the owner of the vehicles. Names, addresses, driver's license numbers, vehicle descriptions and registration information are essential. In addition, a description of the damages is needed for completion of accident reports. If the accident is investigated by off-site police agencies, request that a copy of the police report be sent to the company or obtain the name, department and contact information of the investigating officer.

In case of collision with an unattended vehicle (or other property), the driver of the moving vehicle is required by law to notify the other party and to exchange information pertaining to the collision. If unable to locate the other party, leave a note in, or attached to, the vehicle (or other property) giving the drivers name, address and vehicle license number.

The driver of any company vehicle involved in an accident must also complete a motor vehicle accident report and submit it to the company within one work day of the accident.

## **Safety Hazards Correction**

All accidents involving company furnished vehicles will be reviewed to determine if safety hazards correction is required.

## **Summary**

While the company will provide all mechanical and physical safeguards, as well as training, required for personal safety and health in keeping with the highest standards, for this program to be successful, the employees must also be responsible for recognizing that safety and accident prevention is an essential part of their every day work processes.

We must follow all rules of safety established for your protection and constantly be aware of conditions in all work areas that can produce injuries, on and off our premises.

No employee is required to work at a job they know is not safe or healthful. It is expected that once an unsafe or unhealthy situation is recognized, the condition will be reported and corrected.

By working together as a team and keeping safety at the forefront of our every action, we can assure ourselves of a safe and hospitable workplace for us all.