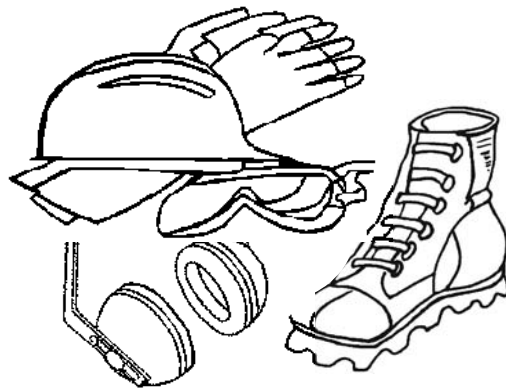




SAFETY MANUAL  
&  
OPERATIONS  
POLICIES/PROCEDURES



1700 West Big Beaver Road, Troy, Michigan 48084  
(248) 346-0076 Office (248) 643-6119 Fax

Topic.....	Page
Safety and Health Policy.....	3
Safety and Health Objectives .....	3
Job Site Inspections.....	3
Qualified/Competent Safety Administrator.....	4
Personal Protective Equipment .....	4-5
Safety Discipline .....	5
Lockout Tagout Policy .....	5
Confined Space Policy.....	6
Emergency Procedure .....	6
First Aid.....	6
Hazard Communication Policy.....	7
Material Safety Data Sheets .....	7
Accident and Incident Reporting Policy .....	7
Bloodborne Pathogen Policy .....	7
<b>Operations Policies and Procedures</b>	
Open Door Policy.....	8
Equal Employment Opportunity .....	8
Drug Free Workplace Policy .....	8
Employment At Will Policy .....	8
Outside Employment .....	8
Employee Information.....	8-9
Business Ethics .....	9
Prohibited Workplace Harassment Policy.....	9-10
Job Classification.....	10
Dress Code and Appearance .....	10
Work Schedules.....	10
Working Hours .....	10
Employee Meal-Break Policy.....	11
Pay Check Issuance .....	11
Overtime Pay .....	11
Payroll Deductions.....	11
Garnishments .....	11
Benefits.....	12
Holiday.....	12
Pay at Separation of Employment .....	12

**Safety and Health Policy**

- Policy:** It is our policy that every Linda Weston Personnel, Inc., employee is entitled to a safe and healthful workplace. All employees will follow safe work practices, obey safety and health rules, and work in a manner that maintains high safety and health standards.
- Procedure:** We will provide and maintain, safe and healthful working conditions. We will establish policies and insist upon work methods and practices that promote a safe and healthful workplace at all times. Nurturing a positive employee environment with open communication, employee involvement and participation, will ensure achievement of high safety and health performance.
- 

**Safety and Health Objectives**

- Policy:** It is the policy of Linda Weston Personnel, Inc., to achieve worker safety and health by achieving our specified safety and health objectives.
- Procedure:** Worker safety and health will be achieved by following these procedures:
- a) Using a qualified safety person
  - b) Making regular job site safety inspections
  - c) Enforcing the use of safety equipment
  - d) Following safety procedures and rules
  - e) Providing on-going safety training
  - f) Enforcing safety rules and using appropriate discipline
- 

**Job Site Inspections**

- Policy:** It is the policy of Linda Weston Personnel, Inc., to provide a safe and healthful workplace for all employees. In addition it is the policy of Linda Weston Personnel, Inc., to require customers to provide safe and healthful workplaces for our employees while they work at the customer's site.
- Procedure:** The customer's designated competent safety person, shall to tour the job site and provide a list, to our company, of any observed potential safety/health hazards. A record of all safety correspondence will be kept on file at Linda Weston Personnel, Inc. The customer shall also provide, in writing, their measures taken to:
- a) Remove the hazard
  - b) Guarding employees against the hazard as required by OSHA, MIOSHA (MI), and Safe State (AL)
  - c) Enforce use of personal protective equipment (P.P.E)

- d) Train workers in safe work practices
- 

### **Qualified/Competent Safety Administrator**

**Policy:**

It is the policy of Linda Weston Personnel, Inc., to provide a qualified or competent safety person to administer the safety and health program for this organization.

- a) A **qualified** safety administrator is defined by the Occupational Safety and Health Act (OSHA) as "one who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience, has successfully demonstrated his/her ability to solve or resolve problems related to the subject matter, the work or the project."
- b) A **competent** safety administrator is defined by OSHA as "one who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them."

**Procedure:**

Our qualified safety administrator is **Sheila Melendez**. Her office telephone number is (248) 643-0076. The expectations of administering this program require the administrator to:

- a) Be knowledgeable of potential job hazards
- b) Assure compliance with safety and health standard requirements
- c) Enforce regular or frequent safety inspections
- d) Establish safety procedures
- e) Correlate regular safety training with lead persons
- f) Maintain employee safety records

Any questions, concerns or reports shall be made to the Linda Weston Personnel, Inc., office, verbally, or by fax. Our fax number is (248) 643-6119. However, due to severity and importance of safety to our employees, all incidents or injuries shall be called in to our office, immediately.

---

### **Personal Protective Equipment (P.P.E)**

**Policy:**

It is the policy of Linda Weston Personnel, Inc., to enforce controlling a hazard at its source. This is the best way to protect employees. (See P.P.E. training manual)

- Procedure:** When engineering, work practice and administrative controls can't protect employees, personal protective equipment (PPE) shall be required to be worn and enforced.
- a) Head protection will be worn on job sites when there are potentials of falling objects, hair entanglement, burning, or electrical hazards.
  - b) Eye protection will be worn when there are potentials of hazards from flying objects or particles, chemicals, arcing, glare, or dust.
  - c) Protective footwear shall be worn to protect from falling objects, chemicals, or stepping on sharp objects. Athletic or canvas-type shoes shall not be worn.
  - d) Protective gloves or clothing shall be worn when required to protect against a hazard.
  - e) Harnesses and lanyards shall be utilized for fall protection as required in lift manuals; and by OSHA, MIOSHA (MI), and Safe State (AL), the stricter standard applies.
- 

### **Safety Discipline**

- Policy:** It is the policy of Linda Weston Personnel, Inc., to enforce safety and discipline for violations of safety policy.
- Procedure:** A violation of safety policy results in disciplinary action. A three (3) step disciplinary process is in place. It is as follows:
- a) Written warning; copies to employee and employee's file
  - b) Written warning; suspension without pay, or, up to and including termination depending on severity of violation.
    - i. Determined by Competent Safety Administrator
  - c) Written report for file and immediate termination
- 

### **Lockout-Tagout Procedures**

- Policy:** It is the policy of Linda Weston Personnel, Inc., to not practice or employ positions requiring Lockout-Tagout procedures.
- Procedure:** Electricians will be called for service when necessary. Electricians will not be sub-contracted or employed by Linda Weston Personnel, Inc. Employees of Linda Weston Personnel, Inc., shall not practice in the electrical field.
-

### **Confined Space Procedures**

**Policy:** It is the policy of Linda Weston Personnel, Inc., to not practice or employ positions requiring confined space work.

**Procedure:** A confined space is defined by OSHA as a space that is not designed for continuous employee occupancy. It is large enough and so configured that a person can bodily enter into and perform assigned work; and has limited or restricted means for entry or exit.

---

### **Emergency Procedures**

**Policy:** It is the policy of Linda Weston Personnel, Inc., to make every employee aware of emergency procedures.

**Procedure:** In case of an emergency at work, our customers are required to provide, to our employees, the following procedures:

- a) Method of communication should be determined at each site, telephone, radio, etc.
- b) Emergency telephone numbers should be posted:
  - i. Police
  - ii. Fire
  - iii. Medical Response Team
- c) Post near communication station the address of your site
- d) Post names of first aid responders on site
- e) Designate person to direct emergency crews to site of emergency

---

### **First Aid**

**Policy:** It is the policy of Linda Weston Personnel, Inc. to provide First Aid supplies and care to our employees.

**Procedure:** First Aid supplies, such as band-aids, will be given to employees as needed. All Linda Weston Personnel business locations are located within 10 minutes from a medical facility. First Aid is intended to treat minor injuries. It is not an Emergency Medical Plan. Employees shall notify the HR department should a medical condition require emergency preparedness.

---

**Hazard Communication Program**

- Policy:** It is the policy of Linda Weston Personnel, Inc. to have a Written Hazard Communication Program informing all Employees of their “Right to Know” including any Hazardous Exposure.
- Procedure:** The Written Hazard Communication Program has been established for Linda Weston Personnel, Inc. This program is available for review by all Employees. (See Hazard Communication Program)
- 

**Material Safety Data Sheets (M.S.D.S)**

- Policy:** It is the policy of Linda Weston Personnel, Inc. that all chemicals will be accompanied with an M.S.D.S sheet. (See M.S.D.S Program)
- Procedure:** All employees shall be trained in the safe practice and use of any chemicals they could come in contact with. M.S.D.S reporting and training is provided in the Hazard Communication Program.
- 

**Accident and Incident Reporting**

- Policy:** It is the policy of Linda Weston Personnel, Inc., to have all incidents and accidents reported immediately to 248-643-0076.
- Procedure:** Safety measures shall be taken to ensure reoccurrence will be eliminated. The OSHA 300A, Form 300, and 301 forms will be completed and posted from February 1<sup>st</sup> through April 30<sup>th</sup> of every year. There are two types of Accident/Incidents:
- a) Incident – When an accident almost happens. For example: you notice someone could trip over a cord that is on the floor. Tape the cord to the floor to avoid the trip hazard.
  - b) Accident
    - i. First Aid – Band-aid, minor cut, bruise
    - ii. Injury/damage – personal injury or property damage
- 

**Bloodborne Pathogen Program (B.B.P)**

- Policy:** It is the policy of Linda Weston Personnel, Inc., to not practice or employ positions requiring assistance or potential exposure to bodily fluids.
- Procedure:** All employees shall be trained in the safe practice and use of any PPE. See First Aid Policy if assisting first aid.

## **OPERATIONS POLICIES AND PROCEDURES**

---

### **Open Door Policy**

Every employee is vital to our growth and success. Almost everyone has an occasional idea, questions, or problem relating to their job. We encourage employees to openly and freely discuss issues of concern with their Project Manager. Please do not be shy, whenever you have an idea or concern feel free to let us know. We are all a part of the same team, everyone is important to us.

---

### **Equal Employment Opportunity**

LWP, Inc., is an equal opportunity employer. Employment selection and all other employment decisions are made without regard to race, color, religion, national origin, sex, disability or handicap, age, height, weight, veteran status, marital status, or any other reason prohibited by law. Any employee found to be engaging in any type of unlawful discrimination will be subject to disciplinary action up to and including termination of employment. Any employee who feels discriminated against is expected to make a complaint to their Project Manager or directly to anyone at the corporate office. A thorough investigation will be conducted. The complaint will be kept confidential to the maximum extend possible.

---

### **Drug-Free Workplace Policy**

LWP, Inc., is committed to protecting the safety, health and well being of all employees and other individuals in our workplace. We recognize that alcohol abuse and drug use poses a significant threat to our goals. We have established a Drug-Free workplace program that balances our respect for our employees with the need to maintain an Alcohol and Drug-Free Environment. This policy recognizes that employee involvement with alcohol and other drugs can be very disruptive, adversely affect the quality of work and performance of employees, pose serious health risks to users and others, and have a negative impact on productivity and morale. (See Drug Free Workplace Policy)

---

### **Employment At Will**

This Handbook should not be interpreted as an express or implied contract of employment. LWP, Inc., is an “at will” employer. As such, all employees (including you) are “at will” employees. In other words, for any non-discriminatory reason or for no reason, LWP, Inc., may terminate the employment of any employee with or without cause or notice.

---

### **Outside Employment**

All LWP, Inc., employees are expected to devote their workday efforts to the job for which they were hired. While at the worksite premises, employees are not allowed to promote, distribute, sell or recruit for any other types of employment. (i.e. Mary-Kay Cosmetics, Avon, Arbonne, Tupperware, etc.)

---

### **Employee Information**

It's very important for LWP, Inc., and our employees to be on the same page and for our employees to inform us about any major changes that may affect employment status. Therefore, we request that employees notify their Project Manager, as soon as possible,

as to the following changes, in order to not compromise our employees' benefits, W-2's and paycheck processing:

- a) Name
  - b) Address
  - c) Telephone number
  - d) Marital status
  - e) Number of dependents
  - f) All important health information
  - g) Emergency telephone numbers and information on whom to notify in case of emergency
  - h) Change of beneficiary
  - l) Authorized payroll deductions
- 

**Business Ethics**

It is the intent of LWP, Inc., that its business practices are compatible with current legal, economic and social practices in which the company operates. Although honesty and integrity will always remain a constant practice, we must conform to all laws, policies and procedures as outlined by code up to and including incorporation.

---

**Prohibited Workplace Harassment**

It continues to be the policy of LWP, Inc., to provide and maintain a work environment that is free of harassment and discrimination based on race, color, creed, religion, national origin, gender (see sexual harassment policy), disability or handicap, age, height, weight, veteran status, marital status, sexual orientation or any other legally protected status. All employees of LWP, Inc., as well as all other persons or entities affiliated or connected LWP, Inc., are prohibited from engaging in any behavior that constitutes such harassment. Harassment is any unwelcome or unsolicited verbal, physical, or other conduct that is based on any of 18 LWP, Inc., Employee Handbook Revised 8/24/07 the legally protected characteristics described above and which is sufficiently severe or pervasive to create a hostile working environment (defined as conduct which interferes with an employee's work performance or creates an intimidating, hostile or offensive work environment), or a supervisor's harassing conduct that results in a tangible change in an employee's employment status or benefits.

- a) Examples of harassment include, but are not limited to:
  - i. Disparaging remarks about a person's race, color, religion, national origin, sex, disability or handicap, age, height, weight, or any other legally protected status
  - ii. Unwelcome or unsolicited touching or threats of physical harm
  - iii. The use of degrading words, nicknames, pictures, stories, or jokes
- b) What you should do
  - i. Any employee who feels that he or she is a victim of harassment is expected to bring the matter immediately to the attention to the Project Manager or Corporate Office.
- c) What LWP, Inc., will do
  - i. LWP, Inc., will promptly investigate all allegations of harassment in as confidential a manner as possible. LWP, Inc., prohibits retaliation against any person who brings a complaint of discriminatory harassment or who takes part in investigating such a complaint. Any employee found to be engaging in discriminatory

---

harassment will be subject to disciplinary action, up to and including termination of employment.

---

### **Job Classification**

Employees will be classified under an established job code, which will be used on all personnel records and to establish compensation and benefits as outlined per U.S. Wage Determination. There are NO contracts that exist between LWP, Inc., and any employee. Payroll classifications may be changed for reasons such as transfer, promotion, demotion, restructuring, reevaluation, creating or eliminating the job/job duties or other business related reasons.

---

### **Dress Code and Appearance**

How employees present themselves to the customer worksite is a direct reflection on the quality LWP, Inc. retains as an employee. The Dress Code and Appearance policy has been designed to ensure that our employees maintain the LWP, Inc., image and to identify employees as part of the same team no matter which jobsite they are working. All employees are required to follow the dress code of the jobsite of which he/she works. All Shirts must have a minimum 3 ¼ inch sleeve. All button down shirts must be buttoned at the first button or have a crew neck shirt underneath. All clothing should fit appropriately as not to be “skin” tight and not to be “baggy”. Baggy clothing is a safety hazard. No open toe shoes are allowed. If there are any questions, please follow up with your Project Manager.

---

### **Work Schedules**

The work schedules will be determined as the customer (Site Workplace) dictates, in order to universally service the individual needs of all LWP, Inc., customers. Certain positions will require the employee to work every other weekend, please see your Project Manager for further information.

Requests for time off that you might know about in advance must be made in writing, no less than two weeks of the appointment. Time off must be approved in advance and a schedule set up between the employee and their supervisor as to when they will make up the time missed. Lunch hours (or thirty minutes) cannot be used to make up time off. Employees are not permitted to accrue so-called “comp time”, and you may not “bank” extra hours in advance of taking a part of a day off.

If you are unable to work your scheduled shift, please be courteous enough to give the Project Manager as much advance notice as possible. No one likes to work understaffed. Please call the Project Manager and personally speak with them to notify them that you will be unable to come in. Excessive call offs will not be tolerated and may result in terminations. Those individuals would choose not to be courteous enough to call in when they will not be able to work and are considered to be a “No Call, No Show” will be terminated after the first no call, no show.

---

### **Working Hours**

Each full-time employee is entitled to thirty (30) minutes for lunch. Lunch Periods and 15 Minute Breaks are to be scheduled by the employee's immediate supervisor. Part-time employees will work the dates and times scheduled by their supervisors. You cannot work through your lunchtime to make up time missed.

---

**Employee Meal - Break Policy:**

Employees must take breaks in the designated employee areas. Employees must sign in/out when going on unpaid breaks.

- a) If scheduled less than 5 hours:
    - a. No Break is required per policy
  - b) If scheduled to work more than 5 hours but less than 10 hours:
    - a. One (1) thirty-minute (30) Minute Unpaid Break is Required to be taken
  - c) If scheduled to work more than 10 hours
    - a. Contact the Project Manager
  - d) No employee is allowed to work through a Meal/Break Period to make up time lost (See Work Schedules Policy)
- 

**Paycheck Issuance**

All employees are paid on every other Friday. **THERE IS NO WEEK IN THE HOLE CHECK WITHHELD.** If a pay date falls on a holiday, payday will be the day of the week immediately preceding the holiday. You are required to keep all address/direct deposit information updated for prompt and accurate processing/mailing of your paycheck. It can take up to 2 weeks for paychecks to be direct deposited, your check may be mailed to your on file home address.

**There is a \$1.00 fee for direct deposit every two weeks as an administrative charge from the LWP, Inc., bank.**

---

**Overtime Pay**

Employees are expected to work overtime as scheduled, only once it is approved. Hourly employees will be paid at one and one-half times their normal hourly rate of pay for APPROVED overtime hours worked in excess of forty (40) hours per week. All employees must have overtime approved prior to working any hours over forty in a pay week.

---

**Payroll Deductions**

LWP, Inc., will deduct from the employee's gross pay: federal and state income taxes, social security taxes, back taxes, garnishments (including child support) and any other deductions required by law. The employee must authorize, in writing, any other deductions. All deductions are itemized on the employee's pay stub.

LWP, Inc., takes every precaution to insure that employees are paid properly. However, if you believe an error has been made, you should provide a written notice of the alleged error and furnish a clear copy of the pay stub with the written notice, immediately to the Payroll Administrator. If you have made an error, the error will be corrected on the next paycheck. If the error has been made by LWP, Inc., we will attempt to adjust the error immediately. If not immediately, then no later than the next pay period.

---

**Garnishments**

LWP, Inc., is required by state law to honor garnishments of employee wages (including child support) as a court or other government agency or department having such powers may instruct. The law also provides for an administrative fee to be charged when a garnishment is served.

---

**Benefits**

The term "eligible employees" refers to all full time LWP employees unless otherwise designated. Part time hourly employees are usually not eligible for benefits unless otherwise specifically stated (i.e. government temporary assignments). Any questions concerning employment benefits should be directed to Symetra at 1-800-497-3699.

**\*\*Note: Benefits as described in this Handbook and/or the Benefits Exhibit are subject to change at the discretion of LWP, Inc., and/or Symetra from time to time.**

---

**Holidays**

Full time employees working at Government sites are entitled to paid Holidays. Part-time hourly employees are not eligible for paid Holidays (unless specifically outlined; i.e., government temporary assignments) and are compensated only for the hours actually worked. Full time employees are paid 8.0 hours for all approved holidays **so long as they work the entire day before and after the holiday**. Qualified Part time employees are paid 4.0 hours for all approved holidays **so long as they work the entire day before and after the holiday**.

---

**Pay at Separation from Employment**

Employees separated from employment will be paid for time worked (less deductions) on the next regular pay date according to the applicable federal and state laws. Upon separation, employees are expected to return any and all keys, supplies and equipment belonging to LWP, Inc., or belonging to the customer site, and to repay all debts, if any, owed to LWP, Inc., within the next pay period . If the employee does not return property of LWP, Inc., or property of the customer, the employee hereby authorizes the company to deduct the debt from the employee's last paycheck.

---

**{The remaining page is intentionally left blank}**