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WRITTEN WORKPLACE SAFETY PROGRAM



References:

SAF 155	Hazardous Chemical Inventory Report
PPS 025A	Contract/Temporary Employees Safety Orientation
PPS 025B	Staff Employees Safety Orientation
REF 063	Right to Know Certification
Exhibit A	Understanding a Safety Data Sheet
Exhibit B	Safety Data Sheet
Exhibit C	Safety Data Sheet Terms

Purpose:


To inform Staff and Contract/Temporary Employees of his/her rights under OSHA “Right to Know” regarding presence of hazardous chemicals in the workplace and the procedure to follow in the event of a foreseeable emergency.

Scope:

This program applies to all Staff and Temporary employees.

Definitions:

N/A

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Procedure:

As part of our policy to promote workplace safety, we have established procedures to make sure each employee is aware of the safety and health hazards associated with his/her workplace and those associated with the presence of chemicals at work stations or job sites at our facilities or at our clients' facilities.

This is the written Workplace Safety Program for our Company, hereinafter referred to as "Company". It includes sections on Injury Prevention and Workplace Safety as well as our Employees Safety Orientation (PPS 025A & PPS 025B). This program will meet all requirements under applicable federal, state and local laws regarding workplace safety and "right-to-know" laws. Our workplace safety procedures and hazardous chemicals safety procedures are under the direct supervision of the Branch Manager or other site manager as designated by the President or Executive Vice President of the Company. The procedures are intended to ensure the following:

For the Company's own site offices that:

1. Policies are established for safe work conditions;
2. Employees are properly informed of work safety emergency procedures and reporting procedures;
3. Employees receive appropriate work site safety training;
4. All hazardous chemicals are properly identified and labeled before entering the workplace;
5. Safety Data Sheets (SDS refer to Exhibit B) for hazardous chemicals are maintained in each department are readily available to the employees working with those chemicals;
6. Employees working with hazardous chemicals are properly instructed about the potential hazards of these chemicals; how to work safely with them; what special equipment, if any, is required; and how to respond if any emergency arises.

For the sites of Company's clients the procedures are intended to ensure that clients are responsible for:

1. Establishing policies for safe work conditions;
2. Properly informing Company's employees of work safety emergency procedures and reporting procedures.
3. Providing Company's employees with appropriate work site safety training;
4. Properly identifying and labeling all hazardous chemicals before entering the workplace;
5. Requiring Safety Data Sheets (SDS) for hazardous chemicals be maintained in each department and ensuring that they are readily available to the employees working with those chemicals;
6. Ensuring Company's employees working with hazardous chemicals are properly instructed about the potential hazards for these chemicals; how to work safely with them; what special equipment, if any, is required; and how to respond if any emergency arises.


Each Company office has posted any applicable state or local "right-to-know" posters and OSHA safety posters at Interview Rooms to inform employees of any applicable laws. Employees should immediately contact their supervisor if they have any questions regarding the safe handling of any chemicals or of workplace safety.

1. Injury Prevention and Workplace Safety

STATEMENT OF POLICY

A. General Statement of Policy:

It is the written policy of Company to ensure that each employee is informed of his/her rights regarding the existence of an Injury Prevention Program and Safety Training for his/her workplace under the Occupational Safety and Health Act of 1970 and the standards adopted there under as administered by the Occupational Safety and Health Administration (OSHA). If you are on an assignment as a contract employee, you will be working at our client's facility or designated work site and must be informed of your rights by both Company and Client.

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B. Responsible Persons:

Please take the time to carefully read this important information. Should you have any questions, please ask your Branch Manager or On-site Client Supervisor for clarification. Copies of Company's Written Workplace Safety Program and Employee Safety Orientation Program are available for your review at your local branch office. This information may also be available to you on our Company Web Sites.

If you feel that you have not been given sufficient training and information by your Branch Manager and/or On-Site Client Supervisor, please contact the Human Resources Department at 1-888-806-2347 who will act as the overall Supervisor for the Company's Workplace Safety and Hazardous Communication Programs.

POLICY PROCEDURES

A. Workplace Safety:

You must be aware that certain written lists of potentially unsafe and/or hazardous materials, general safety rules and guidelines for identifying potentially unsafe work conditions will be available for your review as designated in your Employees Safety Orientation (PPS 025A & PPS 025B).

B. Injury Prevention:

Both Company and/or client(s) to whom you are assigned have the responsibility of providing you with training and information regarding injury prevention and workplace safety including but not limited to any specific programs and procedures that have been established for such matters.

C. Reporting Injuries:

Company requires that any and all incidents of injury or illness occurring on a work premise of Company and/or client(s) be reported immediately, but no later than twenty-four (24) hours from the time of injury or occurrence. Employees must report these occurrences to their Company Branch Manager as well as their On-Site Supervisor (if applicable) so that the required forms may be filed with the Department of Industrial Accidents, and any relevant insurance carriers for Worker's Compensation coverage. The OSHA Log for recordable injuries and/or illnesses will be updated by the physical site location where the injury or illness took place. Please ask your Branch Manager for a list of Preferred Providers and or Occupational Clinics in your area where you may receive treatment if you are injured on the job.


D. Responding to Complaints:

Employees are required to inform Company and On-Site Supervisor immediately of any safety or health related concerns and/or complaints that they may have regarding their job duties, work areas, use of equipment and/or safety procedures in place at both Company and client work sites. Company will investigate any and all complaints of a safety nature and if applicable, work with client(s) to correct potential safety issues prior to any injuries or illnesses taking place.

TRAINING

A. Specific Work Area Hazards/Training:

Company (for their own physical work premises) and/or client must inform you about any potential site-specific physical and health hazards of your particular work area. You should be given the opportunity to participate in any and all Company and/or client Safety Training and Injury Prevention programs. You should immediately contact Company if for any reason our client does not have any safety training or injury prevention programs, if our client has such programs and did not allow you to participate in those programs or if you only received general safety training, but are in a position that requires site-specific hazard training.

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B. Personal Protective Equipment:

If it is necessary, based on the specific work you perform at a job site, Company and/or client(s) must provide you with any OSHA required personal protective equipment (i.e. eye protection) designed to protect you against certain hazards relating to your job and workplace. If protective equipment is advised but not required, Company requests that you make use of any and all protective equipment available to you.

RECORD KEEPING

Company will adhere to all OSHA laws and guidelines regarding record keeping and posting requirements. This is inclusive of posting the Right to Know Law in an area visible to all employees as well as the accurate filing and subsequent posting of OSHA Logs if and when applicable. Company is only responsible for OSHA posting requirements for their own physical premise(s) where the injury or illness occurred. **Client(s) assume all responsibility for adherence to OSHA Law administration for their own physical premises.** Each Company Branch Manager or designated site manager as well as each designated Client Representative shall maintain all SDS's for any hazardous chemicals only as relates to their own physical premises. Each Company employee will have a signed "Right to Know" certification form (REF 063) in his or her personnel file that will indicate that they have been made aware of their "Right to Know" under all applicable state and federal laws. Employees will be given access to any and all information on file regarding any injury or illness that has been reported by them and/or on their behalf.

CLIENT RESPONSIBILITIES

Prior to conducting business and to the assignment of any of Company's employees to work at a client facility, the client will enter into a Temporary Placement Client Agreement, which will state client's responsibility to adhere to any and all OSHA standards and training. **Client is responsible for adherence to all OSHA laws and policies including, but not limited to a Safety Training and Hazardous Communication Programs.** Client must post Material Safety Data Sheets identifying any and all potentially hazardous chemicals on their physical premises and make available to Company's employees any and all protective equipment as required by OSHA Law.


2. Hazard Communication Program

INTRODUCTION

The Branch Manager or designated site manager of each office of the Company shall follow the procedures established below at subsections B through E in implementing the Company's Hazard Communication Program in the offices of the Company. The Branch Manager or designated site manager of each office of the Company shall require all clients of the Company to enter into a Temporary Placement Client Agreement which addresses client's responsibilities and representations as to compliance with OSHA rules as to safety and hazard communication as relates to their own physical premises. At no time is Company liable for any negligent acts and/or omissions by client(s) with reference to their own Hazardous Communications, Workplace Safety and or OSHA Programs. Client assumes all responsibilities for their adherence to the terms of our Client Agreement with respect to mandatory OSHA training.

IDENTIFICATION OF HAZARDOUS CHEMICALS

The Branch Manager or designated site manager of each physical office of the Company (not inclusive of any client premise) shall identify any hazardous chemicals at the time of the establishment of the office site and at least once every year thereafter and shall complete the Hazardous Chemical Inventory Report (SAF 155) if and when applicable.

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Company will provide employees who will be working at Company sites with a summary of the Hazardous Communication Program including notification of the existence and location of a hazardous chemical inventory if applicable to Company's physical premises. Should no hazardous chemicals be identified at a specific Company work site, then no such list will exist until such time as a hazardous chemical is identified on the Company's physical premises at that specific Company site.

Company will direct employees who will be working at the premises of Company's clients or work sites designated by said clients, to inquire as to the existence of the hazardous chemicals inventory maintained by the client as is their responsibility to disclose and provide any applicable Hazard Training.

SAFETY DATA SHEETS: (SDS)

Branch Manager or designated site manager will request SDS (please refer to Exhibit A) from the appropriate suppliers for all hazardous chemicals identified pursuant to the procedure at subsection B immediately above as pertains to Company's physical premises **(not inclusive of any client premise)**.

The Branch Manager or designated site manager is the person designated to receive all SDSs and is responsible to do the following:

1. Review each SDS to verify that it is complete;
2. Contact the supplier immediately if an SDS is incomplete;
3. Maintain a complete list of all SDSs for hazardous chemicals found at the facility in a location readily available to all employees who are exposed to and/or must use the hazardous chemicals; and
4. Post a notice on the office bulletin board informing employees of their right to see the SDSs and the procedure for requesting to review a SDS and provide each employee with a notice stating same. Copies of SDSs must be on file in the Branch Manager's or designated site manager's office or other relevant offices for review by employees as pertains to Company's physical premises.


The Company will direct employees to request Company's clients to provide information as to the location of all SDSs and the procedure for reviewing same as relates to any and all employees who are or may be exposed to a hazardous chemical on client's premises.

LABELING

The Branch Manager or designated Site Manager will ensure that all containers of hazardous chemicals on the Company's (please refer to Exhibit B) physical premises **(not inclusive of any client premise)** are properly labeled to alert employees to the containers' contents and hazards and will inform employees that it has done so.

An appropriate hazard warning must clearly and concisely identify the hazards of the chemicals. Examples of appropriate hazard warnings are:

1. Describes Physical hazards- classified and listed as corrosive, irritant, reactive oxidizers, flammable/combustible, and explosive
2. Describes Health hazards- classified and listed as acutely toxic, chronically toxic, carcinogenic, mutagenic, teratogenic, sensitizing agent
3. Identifies route of entry and target organs
4. Identifies symptoms, acute and chronic exposure
5. Identifies safe handling procedures
6. Identifies emergency procedures

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The Branch Manager or designated site manager will direct employees to request Company's client to explain and demonstrate its' policy as to ensuring all containers of hazardous chemicals are properly labeled and identified.

TRAINING

A. Employees Working on Company's Premises:

Each employee who may work in the presence of hazardous chemicals (list provided to employee under subsection B above) under normal operating conditions or in a foreseeable emergency will be provided with training at the time that each employee is to begin working in the presence of or with said hazardous chemicals. A new employee will receive training at the time he or she is assigned to an area in which exposure to hazardous chemicals might be present. Likewise, whenever a new hazard is introduced to the workplace, each affected employee will be trained about the hazard.

Training will be conducted by or at the direction of the Branch Manager or designated site manager and will include some or all of the following:


1. Outlines of the requirements contained in the Communication Standard
2. Identity and location of chemicals present in the Company's workplace
3. Location and availability of this Written Standard Communication Program
4. Physical and health effects of the hazardous chemicals present in the Company's workplace (by individual chemical or class of chemical)
5. Methods and observation techniques used to determine the presence or methods and observation techniques used to determine the release of hazardous chemicals in the work area
6. Information about how to lessen or prevent exposure to these hazardous chemicals through the use of control mechanisms work practices, and personnel protective equipment
7. Steps the Company has taken to minimize exposure to these chemicals including the location of eyewash and showers, protective glasses, air cloth air packs, etc.
8. Emergency safety procedures to follow if employees are exposed to these chemicals
9. Instructions about how to read labels and review to obtain the appropriate hazardous information
10. Outlines of the hazard of non-routine tasks such as cleaning tanks and reactors and changing hoses or pipes containing hazardous chemicals
11. Opportunities to ask questions

B. Employees working on client premises/client designated location:

Training by Company should include some or all of the following:

1. Outlines of the requirements contained in the Hazardous Standard
2. Physical and health effects of the hazardous chemicals present in the Client's workplace
3. Methods and observation techniques used to determine the presence or release of hazardous chemicals in the work area
4. Information about how to lessen or prevent exposure to these hazardous chemicals through the use of control mechanisms
5. Instructions about how to read labels and review SDSs to obtain the appropriate hazard information.
6. Steps the Company has taken to minimize exposure to these chemicals including the location of eyewash and showers, protective glasses, air cloth air packs, etc.
7. Emergency safety procedures to follow if employees are exposed to these chemicals
8. Outlines of the hazard of non-routine tasks such as cleaning tanks and reactors and changing hoses or pipes containing hazardous chemicals

Prior to the commencement of work at the Company site or the assignment of an employee to a client's facility, the employee will be given the opportunity to inquire about any applicable Hazard Communication Standards

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such as the items listed above. Prior to initial employment, all employees will be required to sign a "Right to Know" Certification (REF 063) in compliance with state and federal laws.

As a further means of ensuring the safety of each employee working at a client's premises or designated work site, we will remind both Company's employees as well as client management of all employees rights to be made aware of any hazardous chemical that may be present at their work station or job site and remind them to ask their on-the-job supervisor to explain the client's Hazardous Communication Standard before commencing work. Further, we will caution them to not to perform any work with hazardous chemicals on which they are not properly informed or protected; and instruct them to contact their Company Branch Manager or other Company designated representative on any hazardous chemical matter for which they do not feel adequately trained.

The literature provided to existing or prospective clients will include information pertaining to an employee's "Right-to-Know" regarding hazardous chemicals. Among other things, we will inform them that it is their responsibility to advise and train our employees working on their premises if the presence of hazardous chemicals is a normal condition of their workstation or job site, or when the presence of hazardous chemicals might exist in a foreseeable emergency.

Prior to conducting business and to the assignment of any of Company's employees to work at a client facility, the client will enter into a Temporary Placement Client Agreement which will state client's responsibility to advise Company's employees of the work location of hazardous chemicals, the location of safety equipment, and recommended emergency procedures as outlined above in Subsection D Item 2.

Any information client has regarding hazardous chemicals on their physical premises must be provided to the Company's employees by the client.

RECORD KEEPING

The Company and each Branch Manager or designated site manager shall maintain all SDSs for any hazardous chemicals as described in Subsection C above on as relates to the Company's physical premises (not inclusive of any client premise). Each employee will have a signed "Right to Know" Certification form (REF 063) in his or her personnel file that will indicate that they have been made aware of their right to know under all applicable state and federal laws.



Hazard Communication Standard Pictogram

As of June 1, 2015, the Hazard Communication Standard (HCS) will require pictograms on labels to alert users of the chemical hazards to which they may be exposed. Each pictogram consists of a symbol on a white background framed within a red border and represents a distinct hazard(s). The pictogram on the label is determined by the chemical hazard classification.

HCS Pictograms and Hazards

Health Hazard <ul style="list-style-type: none"> • Carcinogen • Mutagenicity • Reproductive Toxicity • Respiratory Sensitizer • Target Organ Toxicity • Aspiration Toxicity 	Flame <ul style="list-style-type: none"> • Flammables • Pyrophorics • Self-Heating • Emits Flammable Gas • Self-Reactives • Organic Peroxides 	Exclamation Mark <ul style="list-style-type: none"> • Irritant (skin and eye) • Skin Sensitizer • Acute Toxicity (harmful) • Narcotic Effects • Respiratory Tract Irritant • Hazardous to Ozone Layer (Non-Mandatory)
Gas Cylinder <ul style="list-style-type: none"> • Gases Under Pressure 	Corrosion <ul style="list-style-type: none"> • Skin Corrosion/ Burns • Eye Damage • Corrosive to Metals 	Exploding Bomb <ul style="list-style-type: none"> • Explosives • Self-Reactives • Organic Peroxides
Flame Over Circle <ul style="list-style-type: none"> • Oxidizers 	Environment (Non-Mandatory) <ul style="list-style-type: none"> • Aquatic Toxicity 	Skull and Crossbones <ul style="list-style-type: none"> • Acute Toxicity (fatal or toxic)

For more information:

Occupational Safety and Health Administration
 U.S. Department of Labor
www.osha.gov (800) 321-OSHA (6742)

OSHA 3491-02 2012



Hazard Communication Safety Data Sheets

The Hazard Communication Standard (HCS) requires chemical manufacturers, distributors, or importers to provide Safety Data Sheets (SDSs) (formerly known as Material Safety Data Sheets or MSDSs) to communicate the hazards of hazardous chemical products. As of June 1, 2015, the HCS will require new SDSs to be in a uniform format, and include the section numbers, the headings, and associated information under the headings below:

Section 1, Identification includes product identifier; manufacturer or distributor name, address, phone number; emergency phone number; recommended use; restrictions on use.

Section 2, Hazard(s) identification includes all hazards regarding the chemical; required label elements.

Section 3, Composition/information on ingredients includes information on chemical ingredients; trade secret claims.

Section 4, First-aid measures includes important symptoms/effects, acute, delayed; required treatment.

Section 5, Fire-fighting measures lists suitable extinguishing techniques, equipment; chemical hazards from fire.

Section 6, Accidental release measures lists emergency procedures; protective equipment; proper methods of containment and cleanup.

Section 7, Handling and storage lists precautions for safe handling and storage, including incompatibilities.

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For more information:

Occupational Safety and Health Administration
 U.S. Department of Labor
www.osha.gov (800) 321-OSHA (6742)

OSHA 3493-02 2012