



COMPASS

GROUP®

CORPORATE SAFETY MANUAL

The Compass Group NA Safety Manual can also be downloaded from the MyCompass website.





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IMPORTANT NOTE: This safety manual was developed by the Compass Group North America (NA) Corporate Safety Team and is administered by the Director of Environmental, Safety and Health and Vice President of Operational Safety. The safety manual is applicable to ALL Compass Group, NA Sectors and is to be used in the field by all personnel. This manual, and any applicable addendums, supersede ALL previous versions. The Corporate Safety Team will continue to monitor and improve upon this manual as required. It is the responsibility of local management to implement and enforce the programs contained in this manual. This material is distributed electronically and is available on the Corporate Safety Website, however, a printed copy, with any applicable updates and addendums, must be maintained at all operating locations.

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SECTION 1 ABOUT THIS GUIDE

- 1.1 Introduction
- 1.2 How to Make the Best Use of this Manual
- 1.3 Mapping Our Way Forward
- 1.4 Safety Policy Statement
- 1.5 Workers' Compensation Policy Statement
- 1.6 Quick Reference Guide for Compass Group CA IIPP

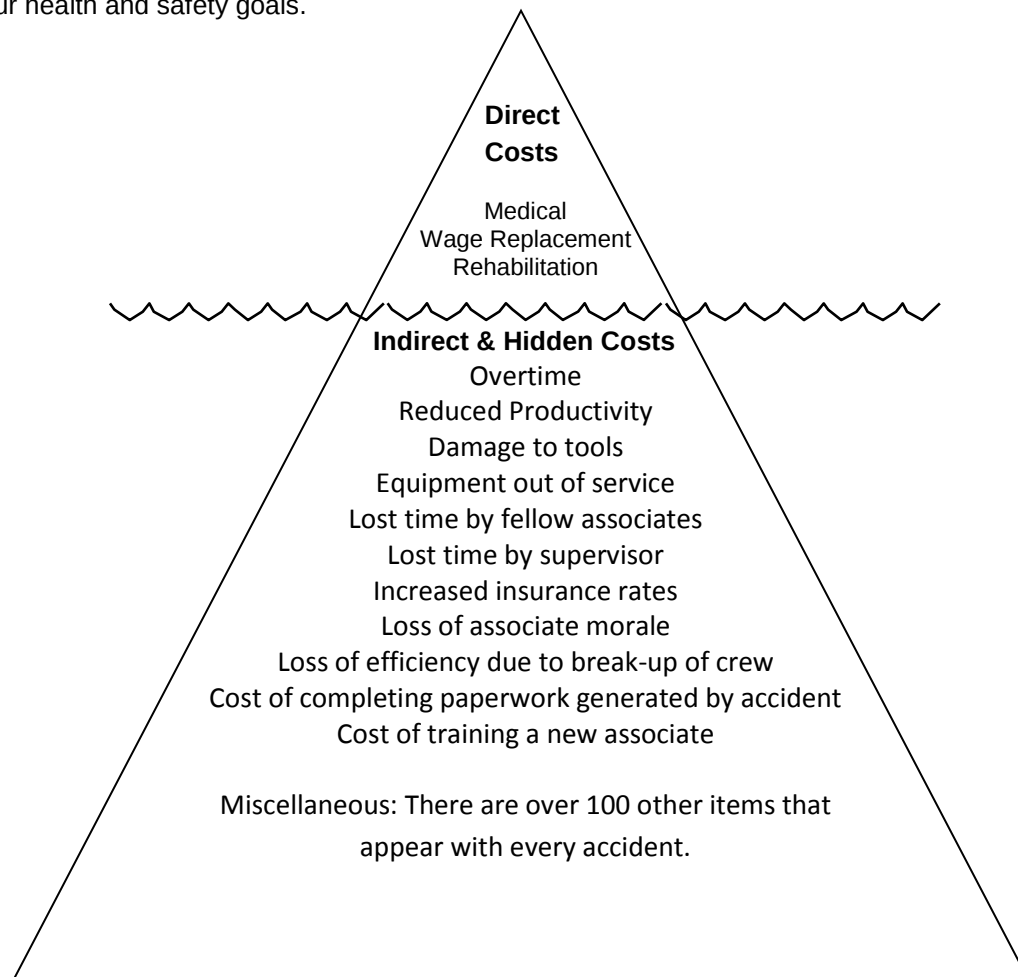
1.1 Introduction

We are counting on all of our associates to take a “safety first” attitude, but your role as part of the Compass Management Team is vitally important, and therefore, active participation is expected. We simply cannot achieve our goals of operational excellence and preferred employer status unless safety is given as much importance as guest satisfaction.

Our safety program encompasses safety in every facet of our lives. We promote safety on the job, and at home. These combined will keep us safe for life. Safety at work is the focus of this manual, yet many of the things taught here should also be practiced off the job, such as wearing a seatbelt and using proper lifting procedures. Additional topics dealing with safety will be covered regularly through communications such as DISH, CHAT and, various other safety communications. Safety for life is the reward to ourselves, and to those who depend on us, as a result of following safe work and play practices. When an associate is away from work due to injury or illness, we cannot operate at the level of excellence we are trying to obtain. This manual and the addendums comprise our Injury Prevention Program, which will help us identify what needs to be done, provides you with the information and tools necessary to prevent injuries, and respond appropriately if someone is injured.

Associate health and safety has a financial impact. For every work-related cut, strain or burn, both the injured person and everyone at the site loses productivity. For every dollar spent to pay for medical attention and lost wages, **8-12 TIMES THAT AMOUNT IS LOST INDIRECTLY**. The Iceberg Theory paints the picture clearly.

It is your responsibility to follow the policies and procedures contained in this manual. By doing so, you can take pride in knowing that your efforts will contribute to the overall success of our company and achieve our health and safety goals.



1.2 How to Make Best Use of this Manual

Use this manual to:

- Standardize safety orientation for all associates.
- Determine the safety training required at your operation.
- Set and enforce safety behavior and activities at your location.
- Share and encourage cooperative safety efforts with our clients who want to be involved.
- Avoid confusion about what steps to take when an injury occurs.
- Control Losses.

This manual has been developed to provide you with a comprehensive reference to the tools needed to operate a safe workplace. It takes you from new associate orientation all the way through returning an associate to work following an injury.

The manual follows a checklist format with corresponding explanations.

The majority of topics in the manual are applicable to all business lines but there are specific references to Dining, Vending, and Environmental Services (EVS). Additional information and requirements for Laundries, Plant Operations and Maintenance (POM), Facilities Management, Healthcare Technical Solutions (HTS), Landscaping, Patient Transport, and Valet Parking are contained in addendums to this manual. These addendums, if applicable to the operation are to be printed and posted in section 9.

In order to simplify the language of this manual the following common terms will be used throughout:
Accidents includes all accidents, incidents, and near misses that may be experienced.

Injury applies to work-related injuries and includes any work-related illnesses.

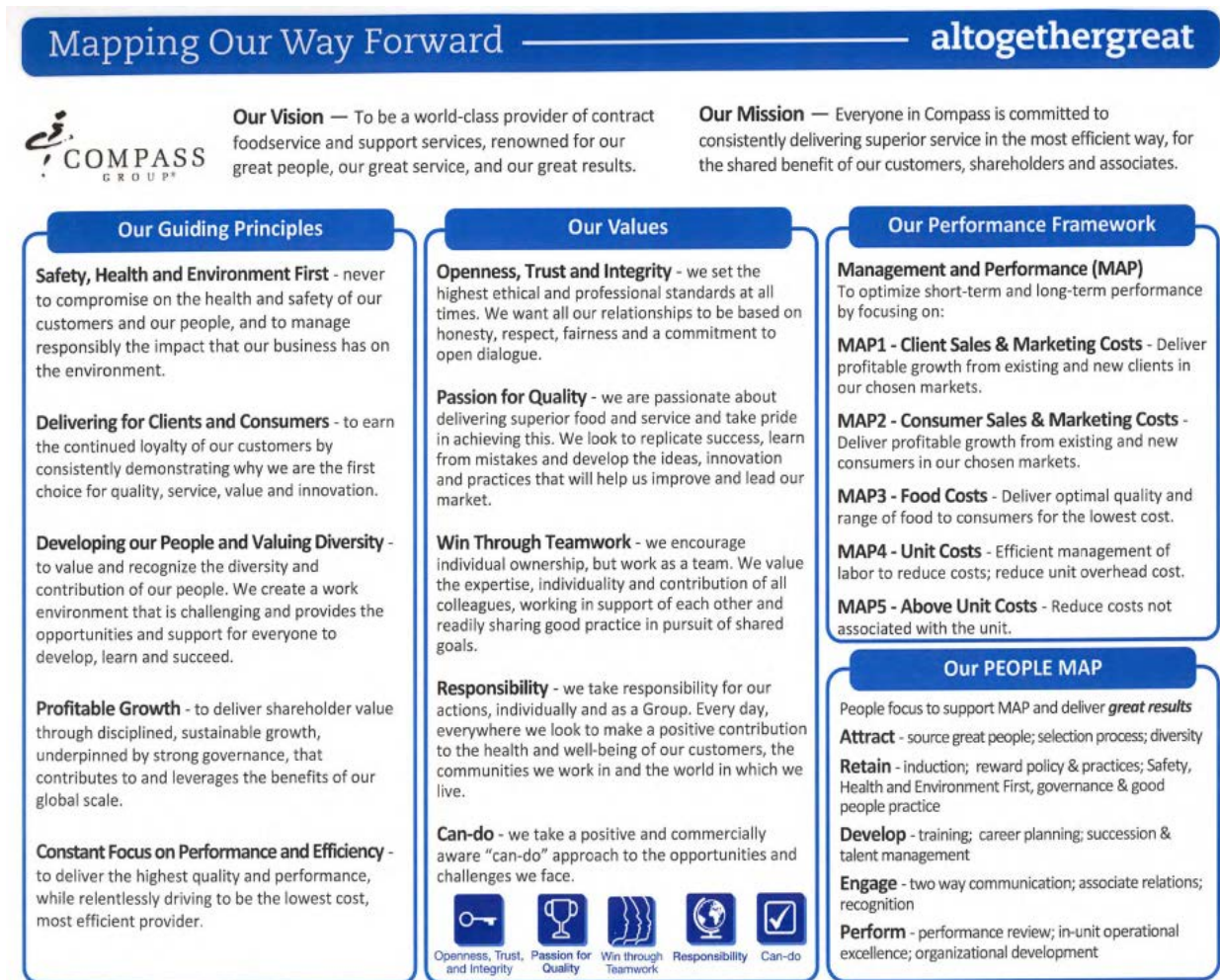
District Manager includes District General Managers, Regional Directors of Operations, Regional Vice Presidents, Vice Presidents, and any other management position with direct oversight of an operation or operations.

Guest includes clients, customers, patrons, patients, and any other person(s) that are being provided service, visiting, or passing through the areas serviced by Compass Group, NA associates. This does NOT include service or delivery personnel.

Safety Champion applies to additional duty safety representatives at all levels regardless of the sectors preferred title.

1.3 Mapping Our Way Forward

As seen in the MAP guidelines from Compass Group LLC, Safety, Health and Environment is the **number one** guiding principle which should be adhered to by all associates, from the top down.



1.4 Safety Policy Statement

Best Practice is defined as “the preferred or best way of putting an element of the Group’s strategy in place.” Best practices should always change as a company evolves and finds safer, better, and more efficient ways of doing business. This is part of what we mean when we talk about moving our company “from good to great!” Therefore, it is vital that we have a safety policy, which we observe, and continually look for ways to improve upon.

Safe work practices are essential to achieving Operational Excellence, being a Preferred Employer and providing superior Guest Satisfaction. By completing each task in a safe manner, associates are protecting themselves, the people who work with them, and the guests they serve, supporting our value of “Winning Through Teamwork”. In order to encompass all of the shared responsibilities involved in providing a safe workplace, we have established an Injury Prevention Program. I have personally reviewed this program and endorse all of its segments. The program includes job training and instruction concerning safe and healthy work practices, a system for investigating work-related incidents and procedures for identifying, evaluating and correcting unsafe work conditions.

By working together, we can accomplish our goal of zero on-the-job injuries. Your part is to follow our safety rules and perform tasks in a manner that will minimize the risk of injury. Our part is to do everything in our power, working in partnership with our clients, to provide you with the safest workplace possible. Together, our efforts will ensure that no associate or guest suffers the misfortune of injury or disability.



Gary R. Green

President and CEO

1.5 Workers' Compensation Policy Statement

If you are injured on the job, we will be sure that proper medical attention is provided and that all Workers' Compensation benefits allowed under state law will be delivered promptly. It is your responsibility to report it at once to your immediate supervisor and receive prompt medical care. Every effort will be made to minimize the time that you will be away from work by offering you temporary modified duties whenever possible. We want to maintain our experienced workforce and expect full cooperation in return-to-work efforts. By participating in the modified duty program, you will heal faster, remain productive, earn more money and be able to return to your regular job duties sooner.

With Workers' Compensation costs spiraling upwards, we will aggressively manage all claims. This will include notice to our carriers about any safety violations that may have caused your injury. We will ensure that all legitimate claims are processed quickly and fairly. However, we will not tolerate abuse. Workers' Compensation claim costs have a direct impact to the profitability of our company. The more profitable we are, the more we can share that success with you. We must, therefore, work together to control the expenses and remain competitive so we can benefit from the growth and opportunities afforded.

Should you have any questions or suggestions, please speak to your immediate supervisor or call the Risk Management Department in our corporate office in Charlotte, NC. The toll free number is 800-357-0012.



Gary R. Green
President and CEO

1.6 Quick Reference Guide for Compass Group California Injury and Illness Prevention Program (CA IIPP)

Accounts in the State of California are required by Cal-OSHA Standards to have a written Injury and Illness Prevention Program (IIPP). Below is a quick reference guide for chapters in this manual that address the CA State IIPP requirements.

IIPP requirement	Section(s) of Safety Manual
Responsibility	1.1 – 1.5, 2.1
System to identify and prevent safety and health hazards	2.1, 3.1 – 3.4
Periodic scheduled inspections	2.2, 3.2
Investigations of injuries, illnesses and accidents	6.1 – 6.2
Associate safety training	4.1 – 4.15, 5.1-5.9, All Addendums
Communication with associates regarding safety and enforcement of safety rules	2.3 – 2.4
Recordkeeping consistent with applicable requirements	2.1, 2.3, 3.2, 4.1, 6.2, 6.3 8.1 – 8.14
Emergency action planning, including medical emergencies	4.12, Addendum 15
Fire prevention and fire emergency planning	4.7, Addendum 17
Work surface and work place safety	4.1 – 4.15, 5.1 – 5.6
Office and commercial establishment safety	5.1
Confined Space Entry	Addendum 11
Heat Illness Prevention	5.9
Ergonomics safety	5.3
Vehicle operation	4.15
Powered Industrial Trucks/Lifts	4.11, Addendum 19
Pressure vessels	4.8, Addendum 12

IMPORTANT NOTE: The addendums referred to above provide additional information and requirements not contained in the main Compass Group, NA Safety Manual. Some addendums apply to specific lines of business (e.g., Patient Transport, Valet Parking, and Landscaping) while others provide additional or more stringent requirements for other business lines (e.g., Laundry, POM, HTS, etc.). All applicable addendums are to be posted in section 9 of this manual.

SECTION 2 A SAFETY MINDSET

- 2.1 Safety Responsibilities Before and After an Incident
- 2.2 Prevent an Injury Before It Happens
- 2.3 Keeping Your Associates Involved and Injury-Free
- 2.4 Safety Committees
- 2.5 Guest Safety

2.1 Safety Responsibilities Before and After an Incident

Each associate is responsible, not only for his or her own safety, but for the safety of fellow associates and guests entering the premises. In addition, every associate is responsible to look for hazards in the workplace. Remember that hazards include unsafe conditions and acts. All hazards must be corrected immediately, and/or reported to management.

Responsibilities of all Associates

Before an injury:

- Actively listen during the safety orientation and training, acknowledging the orientation by signing the acknowledgement form.
- Attend all safety meetings and participate in accident investigations as required by company policy.
- Comply with all company safety rules and be aware that violation of the rules is subject to progressive counseling.
- Participate on a safety committee or task force if requested.
- Report all safety and health hazards of the job to your immediate supervisor, your Safety Champion or to the Corporate Safety Department.

After an injury:

- Report all incidents to a member of management immediately.
- Seek medical attention, if required.
- Cooperate with any accident investigation that takes place regarding your injury.
- Keep your immediate supervisor informed of all related medical appointments as soon as they have been made.
- Provide a status report to your manager immediately after each doctor's visit.
- Accept temporary transitional duty assignments, within your current restriction, when offered.
- Cooperate with the claims adjuster involved in providing your benefits.

Responsibilities of the Supervisor or Manager

Before an injury:

- Ensure that new associates are trained in the safe performance of their duties, through:
 - o The associate safety orientation program
 - o Weekly safety meetings or Safety Minders
 - o Monthly CHAT safety meetings
- Provide safety training with appropriate Job Safety Analysis (JSAs) to new associates or those with new job duties.
- Ensure safety committees are established, meet on a regular basis (at least monthly) and are supported.
- Lead by example. Be a safety ambassador for the company.
- Provide adequate supplies, including spares, of Personal Protective Equipment (PPE) and ensure its use.
- Supervise to ensure that the work is done safely.
- Ensure that equipment is in good repair with safety guards' in-place.
- Inspect the premises and equipment on a daily basis.
- Ensure that Quarterly Safety Self-Inspections are accurately and authentically performed.
- Prevent accidents with proper management and review of injury prevention practices.
- Enforce all Compass and applicable client safety policies.

After an injury:

- Report accidents to the insurance carrier immediately and complete a Compass Report of Injury Packet.
- Conduct an accident investigation for all incidents to determine the root cause.
- Keep in constant communication with the injured associate, claims adjuster and the Corporate Safety Team.
- Work with the Claim Adjuster, Corporate Claim Manager and our Corporate Safety Team to offer temporary transitional duty assignments.
- Update the OSHA 300 log as required (Refer to Section 6.3).

Accident Review

When an accident occurs, even if no one is seriously injured, everyone can identify with the event. Suddenly, discussions about safety come to the forefront. The focus becomes “how did it happen” and “how do we keep it from happening again?”

Information gathered following an accident can be a useful tool in educating associates. Associates can be involved by participating in an informal discussion. The discussion may conclude with ideas about how the accident could have been prevented and what measures have been taken to prevent it from happening again. The participants can also talk about how to keep their co-associates communicating with the injured person if he or she is away from work, and how to welcome them back when they return.

Accident Investigation

A primary tool to identify and recognize factors responsible for accidents is a thorough, properly completed accident investigation. The investigation should be in writing and adequately identify the root cause of the accident or near miss. Although conducting an investigation any time after an accident occurs is helpful, investigations conducted *immediately* after the incident are vital in collecting pertinent information.

The individual completing the investigation should have an understanding of why the accident or near miss occurred and what actions can be taken to prevent reoccurrence. See Section 6.2 for more information.

Safety Recordkeeping

No operation can be successful without adequate documentation and recordkeeping. Recordkeeping enables us to learn from past experience and make corrections for the future. Records of accidents/work related injuries, safety meeting minutes and documentation of associate safety training all serve a valuable purpose.

All Compass Group, NA operations are required to comply with the OSHA recordkeeping rules. These rules require documentation of injuries and illnesses in the workplace and annual posting. See Section 6.3 for more information.

Additional Responsibilities of District Managers

- Authorize purchases of ALL necessary safety supplies, from approved vendors, such as safety goggles/glasses, slip-resistant floor mats, wet floor signs, cut-resistant gloves, first aid kits, etc.
- Review accident reports and safety committee minutes to identify safety needs, accident trends, and develop action plans to address them.
- Review Quarterly Safety Self-Inspections for accuracy, completeness, and proper follow up.
- Ensure that temporary transitional duty is provided for all associates returning to work after an injury.
- Lead by example. Be a safety ambassador for the company.
- Appoint a district safety champion.

Additional Responsibilities of Divisional/Regional Vice Presidents

- Designate District and/or Regional Safety Champions.
- Provide motivation and leadership for the regional safety program.
- Develop a yearly safety action plan to direct the safety program.
- Review accident data to identify accident trends.
- Ensure that all district managers are aware of and comply with company safety policies.
- Implement motivational safety initiatives.
- Work with Corporate Safety and Regional/District Safety Champions to provide safety training for associates.
- Provide resources to field staff to get the job done safely.

Regional Safety Champion

The Regional Safety Champion's duties are designated by the Division/Regional Vice Presidents. It is suggested that they support Division/Regional Level Vice Presidents and Corporate Safety Managers in efforts to reduce accidents and associated costs by:

- Organizing and conducting conference calls for lost workday claims, if potential issues exist (refer to Section 6.1 for details).
- Conducting quarterly Regional Safety Coordinator Meetings.
- Providing updates to the Division/Regional Vice Presidents and District/Regional Managers on regional safety performance.
- Assisting District Managers in managing/coordinating regional safety activities/initiatives.
- Ensuring safety program compliance.
- Administering their account's safety program and compliance.
- Overseeing the Quarterly Safety Self-Inspection process to ensure all safety coordinators submit the inspections on/before the due date.

District Safety Champion

The District Safety Champion's duties are designated by the District/Regional Managers, but it is suggested that they support the District/Regional Managers, Regional Safety Champion and Corporate Safety Managers in efforts to reduce accidents and associated costs by:

- Helping District/Regional Managers manage/coordinate district safety activities.
- Ensuring safety program compliance.
- Providing general support for unit managers.
- Implementing motivational initiatives.
- Overseeing the Quarterly Safety Self-Inspection process to ensure all operations within the district submit their inspections on/before the due date.
- Follow-up on all Quarterly Safety Self-Inspection Action Plans.
- Participating in District Safety Coordinator Meetings.
- Training new/existing managers on Compass Group's Safety Program.
- Conducting training sessions (when applicable).
- Performing safety inspections (when requested).
- Administering his/her account's safety program.

Recommended Unit Safety Champion Profile

- Aptitude and/or passion for safety; ability to function as a "safety technician" with guidance from the Corporate Safety Manager.
- Detail oriented; responsive.
- Good safety record in his/her account(s).
- Demonstrated ability to improve safety in an account as well as the district.
- Good developmental role for promotable individuals.
- An informal leader in the group already.

2.2 Prevent an Injury Before It Happens!

Hire the right people and make sure they know what is expected. *Supervise for safety!*

Daily

Every pre-shift meeting must include a safety related topic. At this time you can discuss any safety-related issues noted during your walk-through or, if none were noted, provide information about any applicable safety topic or ask an associates to provide one. Please don't just say something to the effect of "Remember to work safely." This is also a great opportunity to utilize your Safety Committee members by tasking them to share in delivering the safety message.

If you observe an associate performing a job incorrectly or violating a safety rule, correct the situation on the spot. A few examples are:

- Lifting incorrectly or lifting too much.
- Cleaning the slicer without wearing heavy-duty cut-resistant gloves on both hands.
- Climbing on shelves.
- Using incorrect or broken equipment.
- If an injury or near miss has occurred, discuss the cause and prevention techniques with the associates.

Finally, remind all associates and management team members to utilize our **Stop, Think, Act!** Program throughout the workday. Detailed information about this program can be found on the Compass Safety website.

Weekly

Weekly safety training can be conducted by a variety of means: Use applicable Safety Minders outlined in Chapter 5.6 of this manual. There are also a variety of training resources available on the MyCompass website or from your Corporate Safety Manager.

Monthly

Conduct a safety meeting using the monthly topic provided with your CHAT kit. For months when CHAT features a safety topic that is not applicable to your unit, schedule a refresher safety training course relevant to your operation or recycle an older CHAT safety topic.

Quarterly

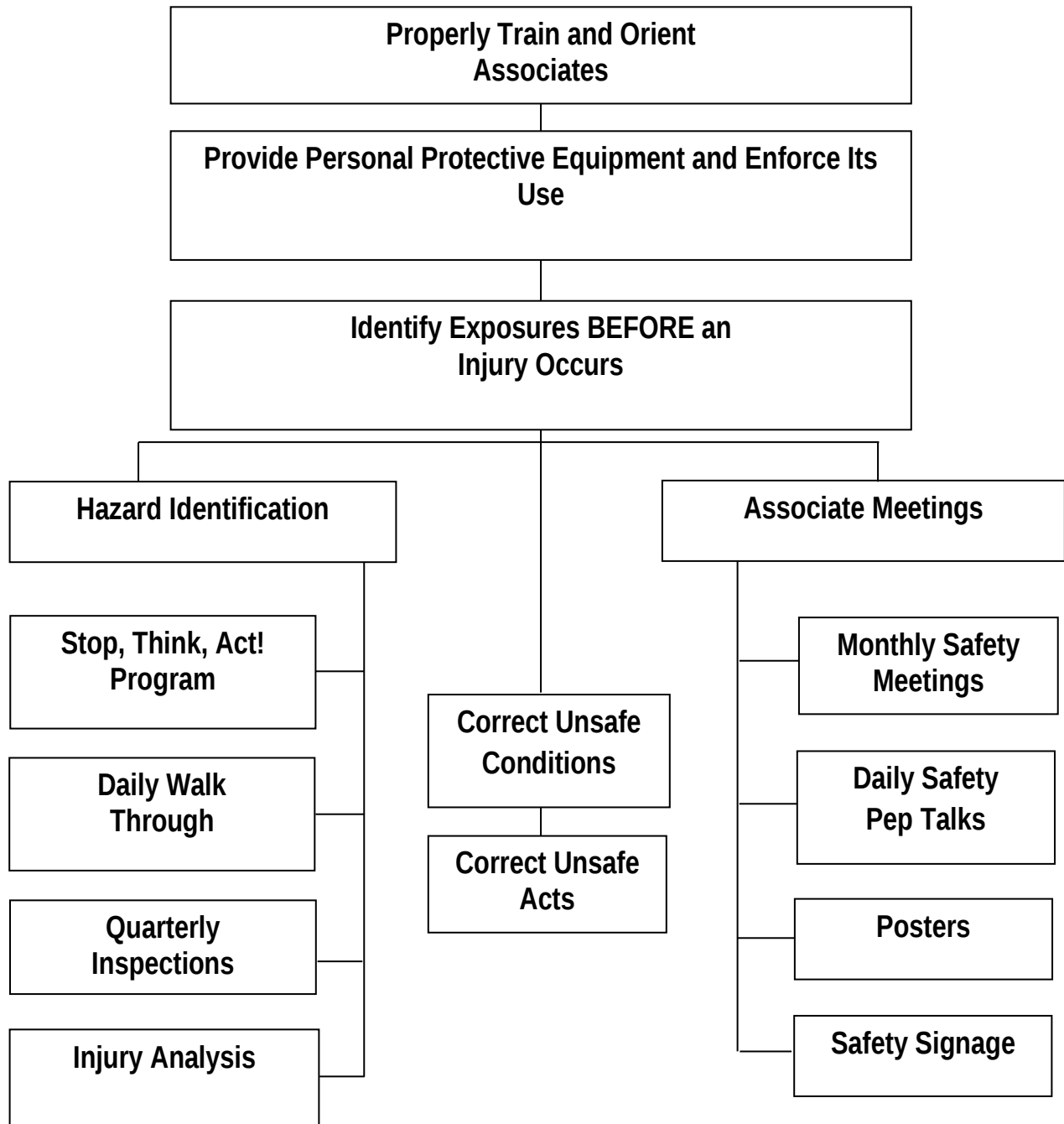
Using the Quarterly Safety Self-Inspection (QSI) Checklist, complete a formal, in-depth inspection of your facility. This is mandatory and can be done by the Manager or members of your Safety Committee. These inspections must be conducted in January, April, July, and October. Record your notes on the QSI checklist, file it for review by your District Manager and enter the data on the website address sent out in March, June, September and December no later than the last day of the month in which the inspection was completed.

Review any notes you've made during the daily inspections to identify trends such as frequent failure to use gloves, finding liquids on floors or brake lights or headlights out on vehicles. Make a list of retraining topics from your notes and general observations.

Publicize checklist results on your Safety Bulletin Board.

Note: If you need help evaluating any items on the checklist, contact your Regional Safety Team Leader or Corporate Safety Manager.

Injury Prevention



2.3 Keeping Your Associates Involved and Injury-Free

Like any other quality issue, maintaining a high level of interest and involvement in safety is a continuous challenge. To be effective, associates need to know:

- That the program and information are relevant to themselves and their jobs.
- What's in it for them?
- What standards Management has set for them.
- That valid safety concerns will be addressed immediately and that safety suggestions will be given prompt consideration.

Visible Promotion of the Program

You may hang posters which reflect a specific safety concern, but before selecting a poster, keep in mind these considerations:

- The poster style and language should match the sophistication/educational level of your staff.
- Be sensitive about pictures, jokes or language which may offend. Don't forget your non-English speaking associates.
- Safety signage should be appropriately displayed.
- Keep track of the number of days your location has gone without an injury and post it daily. (Accident Free Tracking Board).
- Maintain a specific safety bulletin board to post any and all safety updates, notices, rules, awards, etc.

Safety Bulletin Board

If your account has room to post a dedicated Safety Board it can be a valuable asset to the account, if it is attractive, up to date, easy to read, and informative. Ideally the board should be 4' x 3' in order to accommodate all information and should be porous enough for thumb tacks/push pins. The safety board should include the following:

- State/Federal mandatory items
- Safety Record Board ("Days Since Our Last Lost Workday Accident")
- SDS book or location map
- "Location of" sign for Compass Group safety manual
- Copies of the associate pledge (English and Spanish where applicable)
- Signed copy of Managers Safety Pledge
- Emergency evacuation route map
- OSHA 300A from Feb 1 through Apr 30
- First-aid/Anti-Choking poster(s)
- Unit specific safety information, such as "Our Performance", or client requirements
- Workers' Compensation Fraud Poster.
- Safety Committee Meeting Minutes
- Safety contact information
- Sector specific safety information
- Current applicable CHAT poster
- Current applicable CHAT safety topic
- "Shoes For Crews" Safety Shoe poster (Dining and Vending operations)

NOTE: If there is no room for a dedicated safety board then the items above may be strategically placed anywhere there is space available. As another alternative much of the above is available in a digital format and could be placed on an inexpensive digital picture frame allowing easing updates and taking up considerably less wall space.

Space permitting the following items may also be included on the bulletin board:

- Picture(s) of the Safety Committee Members
- Monthly Local Safety Topic.
- Local incentive program information (If applicable)
- Incentive program winners (If applicable)
- Weekly Safety Minders

- “What’s important to me” poster (this is an area of the bulletin board where associates can place pictures of family, hobbies or whatever else is important to them so they can remember why they are being safe at work.)

Important Do’s and Don’ts for safety Bulletin Boards

- DO have the board in a high traffic area (i.e., break room, by time clock, etc.).
- DO update it at least monthly and keep it fresh.
- DO celebrate your safety achievements by including announcements on the board.
- DO have information in primary and secondary language (i.e., Spanish).
- DON’T forget to bring the associate’s attention to the board regularly. If it’s important to you, it will be important to them.
- DON’T allow corporate memos, letters, or other documents that do not involve safety on the board.

Safety Committees

Form a committee whose membership changes periodically to give each associate an opportunity to participate, focus on safety and be recognized by others. Monthly meetings should be held and meeting notes should be posted. The committee can be responsible for completing the Quarterly Safety Self-Inspections. This can be an effective way to increase awareness of hazards in the workplace.

The alternative to the traditional Safety Committee is breaking it up into teams. Each team is responsible for a different aspect of the safety program for a period of time. Membership can be broken down along logical lines of job function, work shifts or other functions. There is no hard and fast rule as to how many associates should sit on the committee but at one member for every 20 associates is a good starting point.

Safety Meetings

Some different types of safety meetings include:

- **Daily Safety Pep Talks.** The goal is to provide a briefing of the day’s activities and issues including how safety will be incorporated. If a hazard has been identified or there has been a near miss or actual accident, this is the time to go over it so everyone learns from the event.
- **Individual Job Safety Talks.** Held spontaneously with an individual as he/she is observed performing the job correctly and safely. *A quick, pre-task talk may prevent an accident. Think through with the associate what hazards may be encountered while they are performing a special assignment.*
- **Monthly Safety Meetings.** Following a pre-set agenda, this is a more structured, formal meeting for all. *Topics will be provided monthly in the CHAT program.*

Associate Recognition Programs

These programs are numerous. Check with your Corporate Safety Manager for assistance as needed.

2.4 Safety Committees

The safety committee meeting is a forum for bringing management and associates together on common ground to discuss methods and means to reduce or eliminate unsafe conditions and practices in the workplace. Through this “face-to-face” contact, some of the most effective communication on safety can take place.

An effective, active and engaged safety committee can educate associates on safe work practices, identify hazards before an injury occurs, become a visible presence in the workplace, and most importantly, demonstrate that safety is everyone’s responsibility.

The safety committee is not intended to replace management’s responsibility for safety. Its purpose is to aid management with valuable input to identify unsafe conditions and practices, provide helpful suggestions for corrective measures, and to obtain the participation of all personnel in the safety effort.

Without associate participation in recognizing and reporting hazards, perhaps the greatest source of discovering them would be lost. Safety does not simply happen. It must be planned, exemplified, motivated, administered and practiced. If a job is safe, it is because someone is working to make it safe. Safe work is effective work and a mark of skill. Associates should never doubt the importance of working safely; all accidents have causes and all can be prevented.

Every Compass operation is encouraged to have an active safety committee. Management and hourly associates should both have representation on the safety committee. It should be the responsibility of the Manager to see that the committee functions properly by:

- Aiding in the selection of the committee members.
- Assuring meetings are held.
- Attending some or all of the meetings to show support.
- Ensuring that meeting minutes are maintained and posted for all to see.
- Providing committee members with appropriate resources (time, materials, etc.).
- Taking prompt and appropriate corrective action regarding recommendations submitted by the committee and/or associates.

When evaluating the responsibilities of the safety committee, there is no template that fits all committees; the committee’s responsibilities are limited only by the scope of the operation’s possible hazards.

However, some basic responsibilities of a safety committee should include:

- Meet at least once per month conducting a serious, productive meeting.
- Document and post the meeting notes for all to see.
- Identify the specific cause(s) of any accident or near incident. Determine if there was a safety rule in effect that covered the incident. If not, work with your Corporate Safety Manager to establish one.
- Look for potential hazards or unsafe practices and correct or report them immediately.
- Report and follow-up on deficiencies that may have been noted on the last Quarterly Self-Inspection.
- Assure that each unit’s Quarterly Self-Inspection is completed.
- Evaluate any safety suggestions and take the necessary actions to implement them, if appropriate.
- Assign and follow-up on all action items noted.

Conducting Effective Safety Committee Meetings

The safety committee Chairperson should assemble the agenda before the meeting to assist in keeping the meeting running efficiently and on-schedule. An effective agenda should reflect all of the committee’s responsibilities and allow for reporting and feedback of activities that take place between meetings. Although the agenda may be quite comprehensive, not all items on the agenda will necessarily be covered in each meeting. During the meeting, a general order of business should be as follows:

1. Call to Order
2. Roll Call
3. Introduction of Visitors
4. Review of Minutes from Previous Meeting

5. Unfinished Business
6. Review of Accidents
7. Safety Training/Education
8. Inspection of Operation
9. Number of Days Without Injury
10. New Business
11. Adjournment

The following 6 steps can streamline the meeting process while most efficiently maximizing the resources of all in attendance:

- Agree on a common hazard for discussion.
- Limit discussion to a single hazard per meeting.
- Develop a comprehensive plan of action to eliminate the hazard.
- Discuss new safety procedures or suggestions.
- Establish follow-up for all identified corrective actions, including a specific time and person(s) responsible for implementation.
- Summarize the meeting by drafting minutes.

After the meeting is adjourned, the Secretary (or other designated person) should prepare the meeting minutes. This is an important step as minutes should be posted on the safety bulletin board and are often sent to individuals outside of the safety committee, including District or Regional management.

Meeting minutes should be prepared as soon as feasible and must accurately record all decisions made by the committee, all motions made by committee members, as well as any actions taken by the committee. Minutes also serve as a means for keeping management informed of the group's activities as well as a basis for follow-up. Form 8.6 is a sample format for documenting safety meetings.

2.5 Guest Safety

Guest safety is very important to the company and we recognize that we play an important role. We want our associates to provide total guest satisfaction, including a safe environment for them to enjoy our service.

To help keep our guests safe, we need to ensure the following:

- Keep floors clear of food and debris.
- Clean-up spills immediately.
- Put up caution signs as needed.
- Be sure slip-resistant and/or walk-off mats are used in areas where there is a potential for a slip/fall incident.
- Provide any safety equipment for guests to keep them safe from injury.
- Check carpeting and flooring throughout the facility to be sure that it is in good condition and that there are no rips, holes or tears.
- Damaged or missing fixtures, equipment or furnishings should be removed from service and replaced as quickly as possible.
- Check the security of signage (including pole mounts) routinely.
- Ensure any additional procedures that the client requires are completed.
- Ensure anti-choking posters are hung in dining seating areas and on/near Dining Operation Safety Bulletin Boards.

General Liability/Guest Claims

General procedures to follow should a guest claim an injury or illness include:

- Do not admit or accept responsibility.
- Be courteous and show concern.
- Obtain name, address, home, and work telephone numbers of guest.
- Obtain same information from anyone who may have witnessed the incident.
- Report the injury to Gallagher-Bassett as a general liability claim.

As appropriate:

- If the guest asks who will pay, inform them that a representative from the company will be in touch with them and will be able to answer any questions they may have.
- After ensuring that the guest is taken care of, inspect the incident location.
- It is not necessary for the guest to see the form or to sign it.
- After completing the investigation and documenting the incident, take appropriate steps to prevent a similar incident from reoccurring.

If contacted by a guest or their representative, take their phone number and ask when would be the best time for our Risk Management representative to reach them. Do not admit or deny liability. Call the Corporate Risk Management Department at (704) 328-6086. If they request to have a telephone number you may give them this number, or our toll free number (800) 357-0012.

Dining/Vending Operations

If the incident involves a foreign object found in the food:

- Obtain the object if possible.
- Obtain product code numbers, manufacturer's name and date of manufacture.
- Indicate what the product was and how much was consumed.
- Instructions as to what to do with the object will be given when the report is called in.

SECTION 3 IDENTIFYING HAZARDS

- 3.1 Hazard Identification – Introduction
- 3.2 Inspections
- 3.3 Hazard Assessment Codes

3.1 Hazard Identification – Introduction

Accidents can only be prevented if the indirect, direct and/or root cause or behavior is identified and corrected BEFORE an injury and/or damage occurs.

Removing hazards increases operating efficiency because the same deficiencies that result in injuries cost additional money in delays and other inefficiencies in the operation.

Hazard Identification Philosophy

The philosophy of hazard identification is simple: stop the accident before it occurs. The methodology, however, is not as simple. In every accident there are two factors: cause and effect. The cause may be a variety of things: physical, emotional, or mental. The effect is a direct result of the cause. There are three basic methods of accident prevention, commonly referred to as the three E's of Safety: Engineering, Education, and Enforcement. These methods can be used individually or collectively.

- **Engineering** is used to correct physical and mechanical hazards (i.e. slicer blade guards, dead man switches on floor equipment, etc.). This is done during the equipment's design/test phase before production begins.
- **Education** enhances personal awareness of hazards, safe work and driving habits, and general safety practices to be used. It is up to all of us to stop accidents before they occur. Good accident prevention efforts begin with you and your supervisors.
- **Enforcement** is used to make sure rules and regulations are followed at all times. Keep in mind that this is a function of local management and Human Resources may need to be consulted.

Hazard Identification Involvement

All Compass Group associates, regardless of tenure or position, including temporary associates and contractors/suppliers must be actively participate in the hazard identification process. Whenever possible the person identifying the hazard should take action to correct it (e.g. mopping up a spill). If the person that identified the hazard is unqualified to correct it then it must be reported to management immediately.

3.2 Inspections

The purpose of a safety inspection is to identify and resolve safety problems. Inspections should not only identify obvious safety discrepancies and deficiencies, but they should also identify possible deficiencies that may lead to a hazard. Some indicators that may point to the development potential of a hazard include:

- Improper use of equipment.
- Inadequate training.
- Improper/non-use of required PPE (i.e. associates not wearing approved slip-resistant shoes).
- Poor attitudes and/or low morale.
- Defective or inadequate tools and equipment.
- Defective or damaged vehicles.

A word of caution concerning safety inspections: possibly the biggest trap an inspection program can fall into is to become “equipment oriented.” Hardware is only part of the inspection. There are actually three areas that need to be evaluated for proper hazard identification:

- **Environment**, which includes facilities, weather and road conditions that our associates may be exposed to.
- **Equipment**, tools and materials.
- **Associates**

Our associates can be the biggest source of accidents and should therefore be periodically observed while performing their duties. An associate who forgets or ignores the rules in the workplace *is* a hazard.

It should also be noted that, although responsibility for ensuring the completion of the Quarterly Self-Inspection lies with the Manager, *ALL* associates are responsible for ensuring a safe workplace every day. Therefore, all associates must be trained to identify hazards and the steps to take when one is identified. This hazard identification process includes the inspection and proper care of personal protective equipment (refer to section 4.13).

The following are the inspection checklists that are to be used:

1. **Daily Hazard Identification Checklist – Vehicles (Form 8.2)** - NOTE: The checklist contained in this manual is for non-DOT registered vehicles only. Use the Inspection Checklist from J.J. Keller (800) 843-3174 Ext. 2295 for ANY vehicle with a DOT number.

This is a tool to assist you in evaluating the general condition of any company owned or leased vehicle to ensure it is safe to operate on a public roadway. Vehicle inspections must be completed every day the vehicle is used. Operating an unsafe vehicle on public roads could result in major liability costs to Compass Group North America regardless of fault.

Walk around your vehicle using Daily Hazard Identification Checklist (Form 8.2).

NOTE: Make copies for use on a daily basis.

The daily inspection for DOT registered vehicles is mandatory. NOTE: In the event of a traffic violation or accident, regardless of fault, law enforcement personnel will require the driver of any DOT registered vehicle to produce a current inspection logbook. Failure to produce a logbook can result in additional violations that are the driver's responsibility.

2. **Quarterly Self-Inspection (QSI) Checklist**- This form should be used as follows:
 - These inspections occur in January, April, July and October.
 - Prior to doing a QSI, review past accidents to determine high hazard jobs, tasks, or areas, as well as the accident's cause. Focus special attention on these areas while doing your inspection.

- QSI forms will be sent along with the appropriate website link for your specific business sector each quarter.
- Complete the QSI checklist form in its entirety with notes of actions taken.
- Enter the data in the website link sent with the QSI reminder no later than the last day of the month in which the inspection is due.
- Keep a file of the completed hard-copy checklists. Review them for trends and use findings as topics for safety meetings.
- Update action items as required.

The completed Quarterly Self-Inspection Checklist forms will be reviewed for compliance with Compass Group's Safety Program.

3.3 Hazard Assessment Code

Once hazards have been identified it is often useful, or necessary, to “rank” them in order of severity using the Hazard Assessment Matrix below in order to prioritize which hazard(s) should be corrected first. The use of the system is actually quite simple first you determine the most realistic severity, then the most realistic probability. Using those we can determine the hazard assessment code (HAC). For example: A pipe is leaking and creating a “wet floor” situation:

- 1) We determine that the most likely severity will be a “III” (lost workday or compensable injury)
- 2) The probability in this case could arguably be a “B” (probably will occur) or a “C” (possible to occur) but let’s make it a “C” for this example.
- 3) Using the matrix we determine that this is a HAC “4” (minor)

Obviously most of our hazards would fall in the HAC4 category with some in the HAC3 and 5 categories and few, if any, 1’s or 2’s.

Because there are 5 possible combinations that could result in an HAC 4 it is feasible that we could have several of them at one time so, to determine which one is the priority, the example above would be written as HAC-4(III,C) which would help us determine that it has a higher priority than a HAC-4(IV,B) would result in a negligible loss but will probably happen in time.

Severity	Probability			
	A	B	C	D
I	1	1	2	4
II	1	2	3	4
III	2	3	4	5
IV	4	4	5	5

Severity Code Description

I Death, permanent total disability or loss of a facility or asset of \$2,000,000 or more

II Permanent partial disability, temporary disability in excess of 3 months or major damage of \$500,000 up to \$2,000,000

III Lost workday injury or compensable injury or minor property damage \$50,000 up to \$500,000

IV Minimal threat to personnel or property, first-aid, minor supportive medical treatment, violation of a standard or damage less than \$50,000

Probability Code Description

A Likely to occur immediately

B Probably will occur in time

C Possible to occur in time

D Unlikely to occur

HAC Code Description

1 Imminent

2 Serious

3 Moderate

4 Minor

5 Negligible

Please bear in mind that while a HAC of 1 is obviously of greater importance than a HAC of 5 it is by no means a “hard and fast” rule that the “1” *must* be fixed first. Many times the higher the HAC the more money it will cost to correct. With this in mind remember that fixing several lower priority items will help prevent accidents while you wait for funds for the higher priorities.

3.4 Hazard Abatement

Equally as important as identifying hazards is abating, or correcting them. Most of the hazards identified in our operations will be simple and only require repairs or correction of bad work habits. But, what if the hazard requires more? OSHA requires that the abatement of hazards use, in order, engineering controls, administrative controls, PPE, or any combination thereof to protect our associates.

Engineering Controls: This is the first step and should be taken to either completely engineer the hazard out or at least minimize the hazard.

Example: A cooling fan in a store room has an exposed pulley and belt drive system that is less than seven feet above floor level. The engineering control would be to have a guard installed over the belt and pulley.

Administrative Controls: This second step attempts to control the hazard by placing limits or restricting certain work processes.

Example: Arranging the store room to limit associates exposure to strain injuries by placing heavy items on middle shelves and lighter items on high shelves or purchasing supplies in smaller containers. (Refer to section 4.3 for further guidance.)

Personal Protective Equipment (PPE): This is the final option that OSHA intends only to be used when neither of the other two options above can control the hazard, do not provide complete control, or are not feasible.

Example: Providing, and ensuring associates use, chemical resistant goggles, gloves, aprons and face shields when working with certain caustic or corrosive cleaning chemicals. (Refer to the applicable Safety Data Sheet(s) for guidance).

An example of combining control measures would be when the caustic chemical referred to in the PPE example is exchanged for one mild enough to be used without chemical resistant gloves or aprons (engineering control) but still requires the use of safety goggles to protect the associates eyes from exposure (PPE).

SECTION 4 SAFETY ORIENTATION

- 4.1 Associate Safety Orientation Checklist
- 4.2 Associate Safety Orientation
- 4.3 Preventing Strains & Sprains
- 4.4 Preventing Slips & Falls
- 4.5 Cut Prevention
- 4.6 Burn Prevention
- 4.7 Fire Safety
- 4.8 Proper Use of Equipment
- 4.9 Hazard Communication
- 4.10 Lockout/Tagout
- 4.11 Powered Industrial Truck Safety
- 4.12 Emergency Evacuation
- 4.13 Personal Protective Equipment
- 4.14 Preventing “Struck By” and “Striking Against” Accidents
- 4.15 Company-Owned Vehicle Safety

4.1 Associate Safety Orientation Checklist

Provide Associate Safety Guide to the new associate.

Discuss the key elements of the guide:

- Safety Policy Statement
- Associate's Responsibilities (Before and After an Injury)
- Key Safety Rules for an Injury Free Workplace
- Hazard Reporting Form
- Workers' Compensation Policy
- Associate's Responsibilities (After an Injury)

Discuss physical demands of the job

Provide the associate with mandatory training, which includes the following:

- Preventing sprains and strains
- Preventing slips, trips, and falls
- Cut prevention
- Burn prevention
- Bloodborne Pathogens
- Hand Washing
- Fire safety
- Emergency evacuation
- Proper use of equipment
- Hazard Communication
- Forklift training/Certification (as required)
- Provide any client specific training or other training specifically required for doing the job correctly

Non Dining operations at Healthcare facilities must also train on:

- Surgical, Specialty (such as ICU-CCU, NICU, Burn Unit, Oncology and Chemotherapy) and, Public Areas
- Sharps Safety
- Standard Precautions
- Psychiatric and Pediatric Units
- Patient Room Cleaning
- Nuclear Medicine
- MRSA
- MRI
- Medical Waste
- Operating Room Between Case and Terminal Cleaning
- Labor and Delivery, Isolation Room Cleaning
- Emergency Room
- C-Diff

Acknowledgement of Training

- Form 8.10 should be completed to document training on each associate.
- Form 8.9 may be used to document group training sessions that do not already have an established acknowledgement form (i.e. CHAT and Safety Minders).
- Additionally each associate and supervisor must sign the applicable Associate Safety Pledge which can be found in the new hire packets (the pledge without the associated Guide can also be found as Forms 8.13 – 8.14), Managers/Directors should use Form 8.8 and Vehicle Operators should use Form 8.7.
- These completed forms must be placed in the associate's personnel file.

4.2 Associate Safety Orientation

It is your responsibility as part of the management team to provide your associates with safety orientation training. The purpose of safety training is to teach associates how to work safely and reduce injuries. Ignoring proper work procedures will result in an unsafe work environment leading to injuries. Safety training is an integral part of your job and is mandatory for:

- ALL new associates.
- When new procedures/processes are introduced.
- When safety performance does not meet expectations and re-training is a possible solution.

This, in turn, will benefit both you and the associate by showing concern for the associate's well-being as well as providing him/her with the proper tools to effectively do his/her job. Safety training is an ongoing process and should therefore not be considered a one-time activity to be completed only during orientation. If you walk, talk and teach safety, an unsafe situation should not arise.

Associate Orientation Script

1. Provide the associate with an Associate Safety Guide. Tell the associate that by signing the checklist at the end of the Guide they are acknowledging receipt of the guide and the training provided.
2. Discuss key elements of the Guide.
Turn to Section 1.4 *Compass Group Safety Policy Statement*; make sure that the associate reads this section. NOTE: This statement is also contained in the Associate Safety Guide.
3. Emphasize that Compass Group will provide a safe workplace and the associate must always:
 - Ask for help, if needed.
 - Ask for clarification if they do not understand how something is supposed to be done.
 - Work safely in order to maintain a safe work environment.
 - Go home every day injury free.
4. Now turn to *Safety Responsibilities Before and After an Injury* (Compass Safety Manual, Section 2.1). NOTE: This information is also contained in the Associate Safety Guide.
 - Read each of the listed responsibilities from the page titled "Associate Responsibilities Before an Injury".
 - Ask the associate if they understand their responsibilities.
 - Ask for any questions.
5. Read through the *Associate Safety Pledge*.
 - Explain to the associate why we have safety rules.
 - Explain these rules are meant to:
 - o Serve as a standard for all Compass associates.
 - o Provide associates with a safe work environment.
6. Turn to section 1.5 *Workers' Compensation Policy Statement*. Make sure the associate reads this section.

NOTE: Failure by management to adequately review and discuss these safety rules with new associates can be grounds for progressive discipline/counseling up to and including possible dismissal.

Review the Unsafe Work Condition Reporting Form

The Notice of Unsafe Work Condition form (Form 8.3) is used to report hazardous conditions within the workplace. Explain to the associate they can use this form if they feel they can't talk to their Supervisor about a safety concern, or if they feel management has been unresponsive to their concerns. An address is provided to mail this form anonymously if they so desire.

Discuss Physical Demands for the Job

If an associate indicates they cannot perform one or more of the physical demands of their job, you must contact your Human Resources Manager and/or Labor Relations representative for proper guidance. These individuals will advise you on how to proceed to minimize potential violations of Federal Law.

4.3 Preventing Sprains and Strains—Making Work Painless

Meeting Leader: *Your presentation will be most effective if you do not read this word for word, but rather use it as an outline for your discussion. Use your personal knowledge and experience to further customize and support the information in the talk.*

Aching joints, tense muscles and painful tendons. Sprains and strains can make us feel older than we really are. You can feel "young again" by using some of the suggestions that we are going to discuss today.

This discussion will describe sprains and strains and how they occur, tips for prevention, Musculoskeletal Disorders, and treatment for sprains and strains.

What Are Sprains and Strains?

Sprains and strains can be defined as small tearing or stretching of soft tissues, which include muscles, tendons, and ligaments. This results in swelling and pain. This tearing or stretching occurs from the misuse or overuse of these tissues. A sudden, awkward twist of your back while lifting is an example of misuse which could result in a strain or sprain. Overuse injuries most often result from performing repetitive work tasks over a long period of time.

Muscles are a band or bundle of fibrous tissue that has the ability to contract, produce movement in or maintain the position of parts of the body. Tendons are narrow bands which attach muscles to bones and transmit force generated by muscles. Ligaments are strong rope-like fibers that connect bones together.

NOTE: In accordance with Section 6.2 of this manual it is imperative that ALL strains and musculoskeletal injuries that result from workplace incidents be thoroughly investigated and, to prevent reoccurrence, an action plan must be developed and implemented immediately.

Preventing Sprains and Strains

The most important step in ensuring that associates remain free of musculoskeletal injuries is to ensure that they are properly trained on task specific prevention methods. Therefore the following tips for preventing sprains and strains have been provided and must be reviewed with ALL associates.

To prevent misuse injuries:

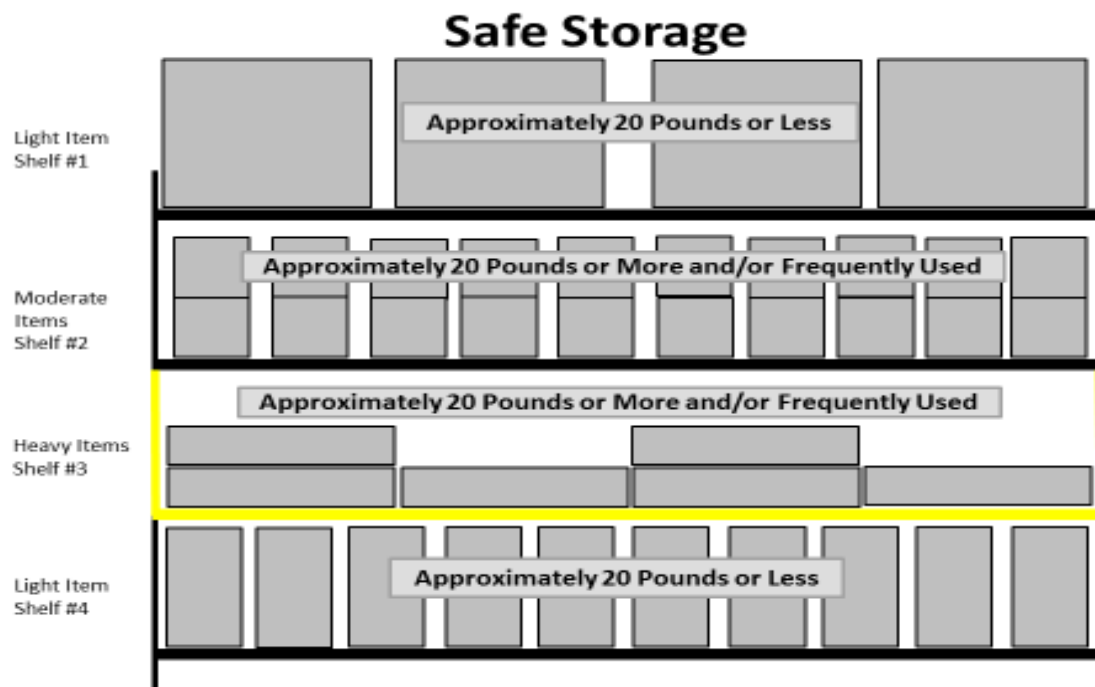
- Before performing any task require manual lifting perform a hazard assessment to determine the following:
 - o Plan the lift.
 - o The size, and weight of the object to be moved.
 - o Whether vision is obscured while carrying.
 - o If a two-person lift is required.
 - o If mechanical lifting equipment is required.
- Perform tasks in a smooth, controlled manner and use safe lifting techniques. For example, instead of jerking a hand truck into motion, try to ease it into motion slowly and smoothly.
- Utilize the appropriate lifting device for the job. When heavy or bulky objects need to be moved, obtain help or use a mechanical aid such as a dolly/hand truck, cart, forklift, etc.
- Pushing is safer than pulling. When using a dolly/hand truck or cart, the preferred method is to push rather than pull. There may be exceptions to this rule and your location manager will let you know the appropriate method to use. NOTE: Pushing will also help prevent you from being "run over" by your own cart.
- Watch your step. Slips and falls often result in sprains and strains. Ensure the surface(s) and path on which the object is to be carried are free of hazards. Look where you are going, wear slip-resistant shoes (where required), and make sure good housekeeping practices are maintained.

- Prevent back strain. Lift, carry, push and pull within your limits. Make use of mechanical aids and team lifts. If lifting alone, use safe lifting techniques. Remember to: plan the lift, bend at the knees, keep the load close, and lift with your legs. Do not bend, lift, and twist. Improper lifting techniques can cause slipped discs, resulting in pain.
- If the use of lifting equipment is required (e.g. due to size and/or weight) but not practical, a two person lift must be used.

NOTE: Use of manual lifting equipment is discussed in section 5.5 *Hand Truck and Cart Safety*

To prevent overuse injuries:

- Arrange your work area to fit your needs. Put tools, equipment and supplies where they can be reached without overextending or twisting.
- Make sure that in store rooms and walk-ins shelves are properly set up. This means that the heaviest items must be stored on the middle shelves so associates do not have to bend when handling them. See pictogram below:



- Stretch and rotate job tasks. Warm up and stretch your body before, during, and after work. If you perform repetitive job tasks, rotate to a task that uses different muscle groups, when possible.
- Move around. This is especially important if your work involves standing or sitting in the same position for long periods of time. Get up and stretch or walk around for a minute or two; get the blood flowing again. This will improve your alertness, too.
- Maintain tools and equipment. Tools and equipment that do not operate properly may require forceful grips or awkward postures to operate them. You can make it easier on yourself by making sure they are well maintained.

Musculoskeletal Disorders (MSDs)

A repetitive strain injury is a type of MSD that results from an accumulation of stresses placed on the body over a long period of time. The most common of these occur to tendons in the shoulders, elbows, and wrists. When muscles, tendons, and ligaments are used frequently and are placed under stress, they may become torn, stretched and inflamed, resulting in pain and discomfort.

Nerve disorders are another type of MSD. An example of this is carpal tunnel syndrome. Carpal tunnel syndrome occurs when tendons in the wrist become inflamed, placing pressure on the median nerve. The result can be numbness and tingling in the hand and fingers.

The tips for prevention that we discussed earlier will help prevent repetitive strain injury. In particular, stretching, and where possible, rotating job tasks and avoiding awkward postures will be most effective in repetitive strain prevention.

NOTE: The overwhelming majority of Compass Group, NA associates rotate tasks regularly, often several times a day, so periodic ergonomic assessments are rarely required and therefore not covered in this manual. If you feel an ergonomic assessment is required contact your Corporate Safety Manager for guidance. If you do have an associate that is completing the same task for several hours each day (e.g. a deli attendant) it is important that the workspace be evaluated by management, at least quarterly, to ensure that no unauthorized changes have been made that would make the task ergonomically unsound.

Even with proper prevention measures in place, sprains and strains sometimes occur.

Manual Lifting Equipment and Proper Storage

Where associates are routinely tasked with moving heavy items we must do all we can to minimize the risk of strain injuries. This can be accomplished by ensuring that, where required, appropriately rated hand trucks, carts, pallet, jacks, forklifts, etc. are available for use by properly trained associates. The use of manual lifting equipment such as hand trucks and carts, but NOT including back belts, is outlined in Section 5.5, forklift use is covered in section 4.11.

Additionally implementation of the Compass Group NA "Safe storage planogram" (see Safe Storage" picture above for example) will go a long way toward ensuring that the risk is minimized as much as possible.

Treatment of Sprains and Strains

Immediate, thorough treatment of sprains and strains will greatly reduce the level of discomfort and reduce the time needed to heal.

Remember the following steps for the treatment of a strain or sprain:

- Report the incident to your Supervisor immediately.
- Apply ice to the injured area. Make sure the ice is not applied directly to the skin, but that the skin is covered with light clothing or a towel. The purpose of ice is to decrease inflammation and swelling and help to relieve minor pain.
- After most of the swelling has gone down, keep the affected joint moving to prevent stiffness.
- If necessary, seek medical attention and follow the recommendations given by your physician.

Additional Training

For additional training, refer to the applicable Compass Safety Minders and the Compass Corporate Safety website.

Final Thoughts

There is no secret "fountain of youth", but using the tips we discussed today can prevent sprains and strains, reduce painful muscle, tendon and ligament discomfort, and in general, make work more enjoyable.

4.4 Preventing Slips and Falls - Don't Fall for It

Meeting Leader: *Your presentation will be most effective if you do not read this word for word, but rather use it as an outline for your discussion. Use your personal knowledge and experience to further customize and support the information in the talk.*

There are very few things in life that are completely preventable, but slip and fall hazards may be. By understanding the causes of slips and falls and preventative measures such as wearing approved slip-resistant shoes, properly utilizing ladders, and spill clean-up, we can significantly reduce injuries associated with slip and fall hazards. A note about slip-resistant shoes: approved shoes will be clearly marked "Slip-Resistant" on the soles.

This discussion will address slips and falls around floors, stairs and ladders.

Floors

Wet or cluttered floors are a main slip and fall hazard.

- To prevent a slip or fall:
 - o Always wear closed-toed comfortable shoes (with steel-toes as appropriate). Approved slip-resistant shoes are required for ALL Vending and Dining, Flik Hotel and Conference Centers, and Touchpoint operations. Slip-resistant shoes are *recommended* for all Crothall operations however they are **required** for all associates performing floor finish stripping tasks.
 - o Utilize wet floor/caution signs. Promptly post signs on a spill or wet floor. If the spill is able to be mopped immediately, leave the sign in place until the floor is dry, and then promptly remove it. Caution signs, when used improperly may also pose a tripping hazard. Wet floor/caution signs should also be placed over electrical cords when they present a tripping hazard, such as when vacuuming. Make sure wet floor/caution signs are utilized when performing carpet cleaning because the transition from wet carpet to a hard floor surface may pose a slip hazard. Ensure wet floor/caution signs are strategically placed where appropriate so that no matter which direction the traffic is coming from, they are aware of the hazard (i.e., at hallway intersections and in front of and behind doors, where appropriate).
 - o When mopping, always utilize the proper technique and do not over saturate the mop head. Mop traffic areas one-half at a time so that a dry path is left for passersby. Remember to always mop your way out of a room.
 - o Have any hazard sources corrected. For instance, have leaky faucets repaired.
 - o Store items immediately - do not allow items to remain in heavy traffic areas.
 - o Clean up any debris that has been left on the floor. Follow the "clean as you go" policy.
 - o Implement the "Take 5" program for cleaning up your workplace several times a day.
 - o Recognize the hazards of working above ground level such as on loading docks.
 - o Where wet or slippery areas are common in Dining Operation production areas, use slip-resistant floor mats. NOTE: The Mighty Mat from Shoes for Crews is currently the only approved slip-resistant floor mat.
 - o Place walk-off mats at facility entrances during inclement weather. At entrances with stairwells, an additional mat may need to be placed at the top of the stairs.
- If a problem is discovered, remember the following:
 - o Warn fellow associates and guests of the hazard by placing warning signs, caution tape or cones in the area.
 - o Clean-up immediately. Never leave a wet or dirty floor for someone else to clean-up.
 - o Store a mop, pail and disposable towels near common wet floor areas.
 - o If there is a large amount of liquid on the floor, get help from a co-associate.

Stairs

Many people forget about the slip and fall hazards that stairs pose. The following points are important to remember:

- Use the handrail when ascending or descending stairs.
- Watch where you are going; you should always be able to see your next step - before you take it.
- Keep stairs clear at all times. Stairs should never be used as storage areas.
- Walk up and down stairs. Do not run or skip steps.
- Keep mats and other materials far away from the top of a flight of stairs.
- If stairs or railings are broken, have them repaired immediately. Report worn abrasive covering or anti-skid tape to your Supervisor. Adequate lighting around stairs will also help avoid slips and falls.

Ladders

Only use approved ladders or step stools; never use boxes, crates, equipment, chairs or other furniture.

General ladder tips:

- ALL portable ladders must be commercially available ("shop built" ladders are not permitted under any circumstances) and meet OSHA/ANSI requirements.
- Do not use chairs or boxes in place of ladders. If you need a ladder, take the time to find one.
- Use the right ladder for the job. For example, instead of using a stepladder and standing on the top step, use an extension ladder. Do not use a metal ladder when there is a risk of coming in contact with electricity.
- Before using a ladder, inspect it to ensure that it is secure and sturdy. If the ladder is damaged, do not use it. Place the ladder out of service by posting a sign on the ladder and report it to your Supervisor.
- Set the ladder up on a level floor that is not wet or greasy. Make sure the rungs of the ladder and the soles of your shoes are not wet.
- Remove all slipping hazards prior to ascending the ladder.
- Do not place a ladder near an unlocked or unguarded door.
- Only one person is allowed on a ladder at any time.
- Do not stand under a ladder.
- When ascending or descending, face the ladder and hold onto the edges with both hands.
- Hoist tools or materials only after you reach the top of the ladder.
- Do not extend your body sideways past the point where your belt buckle aligns with the ladder's side rail. Move the ladder to reach items easily.
- Put away ladders when you are finished. Fold the ladder properly and store it out of the way of forklift or pedestrian pathways.

Step Ladders

- Check the ladder before use. Check for bent legs, bent supports, broken steps, cracks, worn treads on steps, a missing top plate, grease or dirt on steps and rubber feet. NOTE: "Wobbly" ladders should NEVER be used and should be disposed of immediately.
- Ensure that the stepladder's frame locks are fully opened and locked in position prior to climbing.
- Follow the belt buckle rule. Your belt buckle should not be higher than the top step of the ladder or guardrail.
- Do not stand on the top of a stepladder.

Extension Ladders

- Use a spotter to hold the base of the ladder.
- Inspect the rubber feet on the extension ladder before using it.
- Make sure the lock holding the extension is securely in place before climbing it.
- Remember the 4 to 1 rule. For every four feet up, position the ladder one foot out from the wall.
- Do not use the top two steps of the extension ladder.
- Secure the ladder to a stable object at the top.
- When in use extension ladders shall extend a minimum of 3' above top of upper landing surface.

Crothall Operations

Slip-resistant shoes are recommended to prevent injury from slips and falls on liquids, including but not limited to: spills, cleaning solutions, snow, ice and water. Associates involved in chemical spill response and floor stripping operations **shall** be provided and wear rubber boots as required by any applicable Safety Data Sheet. Rubber protective boots provide protection from hazardous chemicals. In the best interest of the associate, use of this protection is mandatory when responding to any chemical spill or standing in a chemical solution.

As part of the Safety Orientation, associates will be made aware of any potential hazards to their feet. If the department policy does not require foot protection, then it should be made clear that it is recommended.

Additional Training

For additional training, refer to the applicable Compass Safety Minders and the Compass Corporate Safety website.

Final Thoughts

Eliminate the slip and fall hazards posed by spills, wet floors, improper mopping procedure, improperly used ladders, and clutter and stairway obstructions. Clean up spills, inspect ladders before use, and keep all areas including traffic paths, storage areas, and stairs free from debris and clutter. Always wear approved slip-resistant shoes.

4.5 Cut Prevention

Meeting Leader: *Your presentation will be most effective if you do not read this word for word, but rather use it as an outline for your discussion. Use your personal knowledge and experience to further customize and support the information in the talk.*

Many precautions can be taken to make the workplace safe for our associates. However, if the tools we use are not used properly, they can cause cuts. So be careful, and follow proper procedures at all times!

This discussion will review some of the fundamentals of preventing cuts.

Causes

Meeting Leader: *Ask the participants, "What are some activities you think most frequently involve cuts?" After responses are discussed be sure to cover the following points.*

Cuts can be caused through many of your daily activities. The more common types are:

- When using knives to cut meat or vegetables.
- When using a box cutter.
- When cleaning up broken glass.
- When working with sharp blades on machines or equipment.
- Sharp edges on damaged equipment.
- Cuts or puncture wounds from needle sticks.

Knives

Statistics indicate that knives are more frequently the source of disabling injuries than any other hand tool. Follow these simple steps to avoid a nasty cut. When using a knife:

- Use the right knife for the job.
- Knives should NEVER be used to cut cardboard or open packaging.
- Make sure your knife is sharp. A dull knife requires more force exerted on it to cut properly.
- Keep knives stored properly, not hidden in drawers, under product or towels, etc.
- Dining Operations
 - o Always wear proper cut-resistant gloves.
 - o Never use a knife as a meat cleaver.
 - o Knives should be cleaned by the user and not left in a sink.
 - o Never carry a knife when carrying another item (this includes cutting boards).
 - o Use a slip-resistant pad under cutting boards to keep them from moving.

In addition, a knife extended over the edge of a sink or stove could cause a cut. Avoid any horseplay with knives.

Box Cutters

The following general tips will help you use box cutters safely:

- Only use approved box cutters. Exposed blades or knives are very dangerous when used for cutting boxes.
- There are "right hand" and "left hand" cutters—use the one best for you.
- Work smart—angle the box away from your body and keep your free hand clear of the blade.
- For maintenance shops that use utility knives, dispose of used blades properly.
- Always retract the blade when you are finished using the cutter.
- Do not use your pocket to carry the box cutter—use a box cutter holder.
- Be aware of your surroundings. Situational awareness is the key!

Scissors

Scissors should be available for use while opening bagged products. Never use a knife or box cutter for this task.

Broken Glass or China

Here are some general guidelines specific to the safe handling of broken glass or china:

- Place wet floor or “caution” signs at the site to alert others.
- Do not pick up the broken pieces with your bare hands, sweep them into a dustpan with a brush or broom.
- Dispose of the material you have swept up by placing it in an approved receptacle. NOTE: It is recommended the unit identify a specific trash receptacle for broken glass and/or china. This receptacle does not have to be limited to broken glass, but associates will know to handle it with more care.

Machinery and Equipment Safety

The following points address preventing cuts when using equipment:

- Only associates that have been properly trained may operate equipment and machines.
- Associate under 18 years of age are not allowed to operate equipment and machines.
- Report any damaged equipment with sharp edges for repair.
- Do not remove guards or shields while operating machines.

Additional Information for Dining Operations:

- "Zero" the blade gauge on the meat slicer when not using it. NOTE: If the slicer in your unit is an older model that leaves the blade exposed during cleaning operations, purchase and use of an approved blade cover is required.
- Never force food through grinders or choppers with your hands, use a plunger or other approved tool.
- When cleaning the blades on slicers, grinders or choppers, wipe with a stroking motion away from the blade edge.
- Wear heavy duty cut-resistant gloves on both hands ONLY while cleaning the slicer, NEVER while operating it.
- Wear cut-resistant gloves while operating or cleaning mandolins or tomato slicers.
- Ensure that mandolins, tomato slicers, and food processor blades are properly stored in a designated area that does not expose associates to cuts.

Needle Sticks/Sharps (EVS)

The majority of cuts/punctures are as a result of hospital staff failing to properly dispose of used sharps. This creates a serious safety issue for EVS associates, as they must use extreme caution when performing their duties. Associates experiencing this type of injury can be exposed to bloodborne pathogens, which are micro-organisms present in human blood that cause disease. To reduce the risk of these types of injuries managers should:

- Ensure associates are aware of needles and other cut/puncture hazards.
- Inform associates to never to pick up a needle and to notify a manager immediately when one is improperly discarded.
- The manager should make every effort to have a hospital staff member, trained in the proper handling of used sharps, to remove the needle.
- Ensure associates carry bags of trash and soiled linen away from their bodies and only by the knot at the top of the bag.
- Provide tools to maneuver and push trash/linen bags into trash chutes.

NOTE to all operations: There are specific procedures that need to take place in the event of a needle stick injury. Please refer to section 5.2, Bloodborne Pathogens for more information.

Additional Training

For additional training, refer to the applicable Compass Safety Minders and the Compass Corporate Safety website.

Final Thoughts

We need you at your best, every day. Any injury, work-related or home-related, impairs your ability to perform. The next time you reach for a knife, some broken glass, or are using a piece of equipment with sharp blades, think about the information discussed today.

4.6 Burn Prevention

Meeting Leader: *Your presentation will be most effective if you do not read this word for word, but rather use it as an outline for your discussion. Use your personal knowledge and experience to further customize and support the information in the talk.*

While Dining operation associates come in contact with hot objects and surfaces as a part of their daily routine (e.g. stoves, fryers, hot cookware and grills) other Compass Group, NA associates may also be exposed to hot surfaces such as heating elements, electric motors, steam lines and hot water. Many people have a tendency to overlook these dangers. Burn injuries can be very serious and potentially disfiguring. In fact, it has been reported that burns account for up to 10% of all food service injuries, and the rate for cooks may be even higher.

Heat Sources

In addition to the obvious hot spots -- stoves, fryers, hot cookware, grills, and other heating elements -- other potential sources of burns may come from chemicals, coffee machines, steamers, dishwashers, dry ice, and overheating electric motors in equipment. Hot liquids are particularly dangerous. Coffee brewers or fryers are taken for granted and associates may forget how hot this equipment can become. Fire and hot surfaces are less frequent causes of the burns that we see in our industry. The biggest culprits are steam, hot oil, and moisture. Chemicals can also be a source of burns. Finally, electrical burns can occur when any type of electrical equipment is defective or has damaged wiring.

Prevention Methods

Many burns in the kitchen result from the use of inappropriate items such as side towels or aprons to handle hot objects or damp hot pads and oven mitts. Moisture conducts heat straight through the padding to the skin.

Associates must be made constantly aware that hot liquids, surfaces, and steam can cause injury. The basic rules listed below can help to avoid the dangers posed by hot items in the workplace, but always remember hazard awareness is rule number one.

- Before touching any item that may be hot, test it first before grabbing it with your hand. Never assume an item has cooled.
- Make sure the SDS is reviewed before handling any chemical. Be aware of potential burn hazards from handling or exposure to specific chemicals, take the recommended precautions and use recommended personal protective equipment. Please refer to section 4.9 Hazard Communication for more information about chemical safety.
- Make sure any piece of electrical powered equipment is in good working order and is properly grounded before operating it. Pay special attention to frayed wiring and damaged plugs. If there is any question about the condition of any piece of equipment, do not use it and notify a manager immediately.
- Turn off, unplug, and report electrically powered equipment that smokes or sparks. Do not use it until repaired or replaced.
- Place only approved containers in the microwave. Be aware that objects cooked in microwaves can be extremely hot even though the microwave itself may seem cool.
- Maintain situational awareness.

Additional Information for Dining Operations:

- Never leave cooking items unattended.
- Use proper dry oven mitts to handle hot objects; never use towels or rags. Wet mitts will transmit steam, causing burns.
- Keep pot and pan handles out of the aisle, so people won't bump into them.
- Don't fill pans so full that they are likely to spill hot foods.
- Never place containers of chemical or hot liquids overhead where they are likely to spill when being removed.
- Use extra caution when opening steamers. Steamer doors should be "cracked" open first to let

- steam vent, then opened all the way to reach items.
- Get help when moving heavy containers of hot food.
- Remove steam table covers, open lids, plastic wrap and other container covers away from you to let steam escape safely.
- Dry foods before putting them in the deep fryer or hot oil may splatter on you.
- When placing foods in hot oil, let them fall away from you, so that hot oil will not splash on you.
- **NEVER** clean or drain fryers when the oil is hot (above 100° Fahrenheit). Grease must be allowed to cool before the cleaning process begins. Change fryer oil in the morning before equipment is turned on.
- Always follow the manufacturer's directions when filtering cooking oil.
- Only use a metal container with a lid to remove used grease (only after properly cooled down).
- Burn sleeves are available from Supply America and will help prevent associates from being splattered by griddle grease.
- Always warn people when you are walking behind them with hot pans or when you are walking behind someone who is working with hot items.
- Areas around stoves and ovens must be kept clean of grease and other flammable materials.
- Never wear loose sleeves when working around stoves. Loose garments may catch fire.
- Should a fire start on the stove, smother it by cutting off the oxygen with a metal lid or other means.
- Keep hoods, including the filters and vents, clean and free of grease build up to prevent fires. Associates should never stand on cooking equipment when cleaning hoods or back splashes.

Chemical Burns

Associates using cleaning chemicals in the performance of their duties and must handle them appropriately to avoid getting them in their eyes or on their skin. Splashing and overspray are the leading causes of this type of injury. Preventive measures by management must include:

- Providing initial and annual refresher Personal Protective Equipment training
- Enforcing the use of gloves and safety glasses("G2" for Crothall EVS operations) when handling chemicals
- Make sure the SDS is reviewed before handling any chemical. Be aware of potential burn hazards from handling or exposure to specific chemicals, take the recommended precautions and use recommended personal protective equipment. Please refer to section 4.9 Hazard Communication for more information about chemical safety.

Additional Training

For additional training, refer to the applicable Compass Safety Minders and the Compass Corporate Safety website.

Final Thoughts

While it is not possible to eliminate the burn hazards in most of our facilities, especially in kitchens, it is possible to limit the potential for burns. Do not use towels, aprons, or paper towels in place of clean, dry hot mitts and wear appropriate PPE when working with chemicals. Keeping aware of the potentially hot surfaces, liquids, and chemical hazards will go a long way towards preventing a painful injury.

4.7 Fire Safety—Staying Out of the Heat

NOTE: The information contained in this section refers to the hazards associated with Vending, Dining, EVS, PT, and Valet parking. All other business lines refer to Addendum 17.

- It has been determined that in the best interest of all Compass Group North America associates, the official company policy shall be the immediate and total evacuation of ALL associates from the workplace upon activation of a fire alarm. This will require that each operation develop a written emergency evacuation plan (see Section 4.12).
- This section is provided for use in units where the client has specifically requested Compass Group North America associates be trained in the use of fire extinguishers. It is the responsibility of the client representative, unit manager, and/or the district manager to determine whether all or “designated” associates will be trained and establish an action plan in writing.

Meeting Leader: *Your presentation will be most effective if you do not read this word for word, but rather use it as an outline for your discussion. Use your personal knowledge and experience to further customize and support the information in the talk.*

The high-pitched shriek of the fire alarm. The smell of smoke in the air. Many people would be unsure how to react. Would you know what to do?

A quick and appropriate reaction to a situation like this helps minimize personal injury and material losses. The purpose of this discussion is to help you proactively identify the hazards which cause fires and make the right decisions when a fire occurs. You will learn to make your work area free from fire hazards and protect your life and the lives of your co-associates.

This discussion will address types of fires, fire prevention, use of a fire extinguisher, and evacuation procedures.

Types of Fires

Different fires require different types of fire extinguishers. This information is important, because before you attempt to extinguish a fire you must first identify its type. The three classes of fire can be remembered using the letters A, B, and C.

Meeting Leader: Say to the group, “After reviewing each class of fire, I want you to give examples where there is a potential for fire at our facility.”

- **Class A Fires** - Class A fires turn to ASHES when burned. Fires involving combustibles such as wood, paper, cloth, and most trash represent typical Class A fires. Extinguish Class A fires with water, Class K, CO₂ or dry chemical extinguishers.
- **Class B Fires** - Class B fires can be remembered by the word BARRELS. Class B fires typically involve materials kept in barrels, like liquids, grease, gases and paints. Extinguish Class B fires with Class K, CO₂ or dry chemical extinguishers.
- **Class C Fires** - Class C fires involve an electrical CURRENT. Motors, switches, and frayed wires are examples of items typically involved in Class C fires. Extinguish Class C fires with dry chemical extinguishers. Do not use water on an electrical fire.
- **Class D Fires** - Class D fires consist of combustible metals such as magnesium, potassium, titanium and zirconium. This type of fire is of little concern outside of the HTS, POM, or Laundry operations. Use only a Class D rated extinguisher for this type of fire and NEVER expose them to water and other common firefighting materials which can excite metal fires and make them worse.
- **Class K or F Fires** – Class K or F fires are unique to Dining Operations as they involve unsaturated cooking oils in well-insulated cooking appliances located in commercial kitchens. Use

only a Class K (sometimes referred to as “kitchen”) extinguisher on this type of fire and never use water. NOTE: Class K extinguishers are liquid filled but that liquid is NOT water.

Fire Prevention

Effective fire prevention occurs when all associates identify, report and correct fire hazards and acquire good fire safety habits. For example:

- Do not use damaged electrical wires, circuits or equipment. Report them immediately to your supervisor.
- Obey the non-smoking policy at all times. Smoke only in designated areas.
- Store used wipes and rags in approved receptacles.
- Keep electrical panels, fire exits and extinguishers clear of obstructions.
- Store flammable liquids in approved, properly sealed containers. Some containers may require grounding.
- Maintain equipment—faulty electrical equipment is a major cause of fires. If you are operating equipment that is hotter than usual, shut it down and let it fully cool. Determine if a mechanical problem exists that could lead to a fire.
- Inspect all basements and/or storerooms on a regular basis for accumulation of materials or trash that could become a fuel source for a fire.
- Empty trash baskets daily. Remove excess trash or debris from hallways, rest rooms, and other areas.
- If applicable, have the batteries and/or wiring of all smoke and heat detection systems checked on a regular basis. Have a certified electrician repair any defective wiring or detection equipment.
- If applicable, have furnaces and heaters cleaned regularly. Dust build-up can cause fires.
- Do not have open flames around any type of chemical, paint, solvent or flammable propane tank.
- Make sure all handheld torches are extinguished when not in use.
- Do not put any type of hot object in trash cans. Tasks that produce flames, such as welding and cutting, should be performed away from combustible materials. If applicable refer to Addendum 13 for specific information on cutting and welding operations.

Meeting Leader: *Suggest to the group other fire prevention tips not on this list. Then ask the group to share experiences of when they have identified or corrected a fire hazard.*

Fire Extinguisher Use

As previously stated it is in the best interest of Compass Group, NAD associates to NOT attempt to use fire extinguishers and evacuate in the event of a fire. If training is required by the client it must be conducted when the associate is initially hired, or designated to use extinguishers, and this training should be conducted by a qualified trainer (e.g. local fire brigade or extinguisher servicing company) as with all training this must be documented. Annual refresher training is also required.

Learning to use a fire extinguisher properly is a skill that all associates should acquire. However, it is just as important to learn when not to use a fire extinguisher. There are several situations when it is in your best interest to save yourself instead of attempting to extinguish the fire.

Meeting Leader: *Ask the group, “When should you NOT fight a fire?” Discuss each situation provided by the associates, including those listed below. You should not fight a fire when:*

- A properly rated fire extinguisher is not readily available.
- You are not trained or do not feel comfortable using a fire extinguisher.
- There is a chance that the fire could block your escape route.
- The fire is too large to fight or seems out of control.

If you decide that you would be unable to safely extinguish the fire, pull the fire alarm, exit the building immediately and meet at your designated location.

If you feel confident that you can extinguish the fire, the simplest way to remember how to use an extinguisher is by the word PASS. **REMEMBER:** Always activate the fire alarm BEFORE using an extinguisher.

Meeting Leader: *Using the fire extinguisher you brought to the meeting and review each of the following steps.*

1. **P-Pull the Pin** - The pin in the handle of the extinguisher is normally attached to a plastic tab that prevents the pin from falling out. With your thumb and index finger, twist the pin clockwise and pull outward. This will break the plastic tab and remove the pin.
2. **A-Aim the Extinguisher** - From a safe distance but within the extinguisher's range, aim the nozzle of the extinguisher at the base of the fire. Remember to leave yourself an escape route.
3. **S-Squeeze the Handle** - To activate your fire extinguisher and release the extinguishing agent, squeeze the handle of the extinguisher.
4. **S-Sweep the Extinguisher** - Using a sweeping motion with the nozzle, sweep back and forth around the edge of the fire to prevent it from spreading. Sweep the nozzle across the base of the flame, covering the burning material. If the fire cannot be extinguished, leave the area immediately.

The best way to extinguish a fire is to fight it at its source. This is very important because a fire extinguisher will last only 3 to 20 seconds.

Fire extinguisher inspections are required as follows:

- Annually by a licensed professional (this is typically arranged by the client).
- Monthly by the locally designated person(s). These checks must include the following;
 - o Ensure the needle in the gauge is in the green zone,
 - o The pin must be installed and sealed,
 - o The nozzle must be intact and serviceable,
 - o The extinguisher must be properly mounted and have unobstructed.

Propane Tank Storage, Handling and Use

Propane tanks should be stored outside in a safe and secured area. There are significant regulations for inside storage of propane tanks. The Manager must first contact local authorities to ensure compliance with all code requirements. If permitted by code and if propane tanks need to be stored inside, it should be in a well-ventilated area. Never store propane tanks in concealed locations such as closets, supply rooms, etc. Storing propane tanks with the Fork Lift in an enclosed area is prohibited due for the potential of a fire. Exposure of the tank to heat can also cause the relief valve to open and release flammable vapors causing a fire to intensify when ignited.

If propane tanks are stored in a shop or area connected to an office complex, it should be separated by a firewall along with proper venting to the outside. If tanks are stored inside a building, the building must be vented at the floor level and at higher levels so that the gas will be dispersed rather than settling to the lower levels and posing a risk of explosion.

Control of Workplace Hazards

- All flammable and combustible material will be stored in a designated area or flammable storage area.
- Good housekeeping will be the responsibility of all associates.
- Waste materials are to be discarded in the proper places.
- Associates are to pick up and sweep any debris on or around their machine on a shift to shift basis.
- All aisles and exits will be kept clean.
- All painted areas to fire extinguishers will be kept clean for access.

- All associates will know how to proceed to evacuation routes and exits when instructed, if an emergency situation develops.
- All associates will be instructed on the company Emergency Action Plan.
- Emergency telephone numbers will be listed on the bulletin board and in the cafeteria for dining operations.
- Each supervisor will be responsible for their associates to handle, store and maintain hazardous materials properly.

Chafing fuel (Dining Operations ONLY)

Only wick style chafing fuel ("Sterno") is authorized to be used by Compass Group, NA dining operations. Under no circumstances is chafing fuel to be lit until the food and other service materials are in the final serving area (refer to the "Wick Fuel" JSA for details). Bent, dented, split, crushed, punctured, cut, or expired chafing fuel shall not be used. In the event that any of these problems have occurred - properly dispose of the chafing fuel and acquire a new one. Unused chafing fuel must be kept in an NFPA approved locker with other flammable materials.

Additional Training

For additional training, refer to the applicable Compass Safety Minders and the Compass Corporate Safety website.

Final Thoughts

Identifying and correcting fire hazards, knowing when and how to use a fire extinguisher and learning the evacuation procedures for your operation will help you prevent fires and act appropriately in emergencies. Prepare yourself for any fire emergency by thinking about the information we discussed today. There may come a time when you will be glad you did.

4.8 Proper Use of Equipment - Operating Out of the Danger Zone

Meeting Leader: *Your presentation will be most effective if you do not read this word for word, but rather use it as an outline for your discussion. Use your personal knowledge and experience to further customize and support the information in the talk. The equipment discussed in this section represents the most common types of equipment used by Compass Group units. Contact your Compass Safety Manager for guidance on any other equipment.*

When operating equipment, accidents can happen very quickly. Have you ever felt your shirtsleeve being caught and pulled into a piece of equipment but realized it in time to pull yourself free? For those of you who have had this experience, you probably remembered to keep your hands and arms clear of the moving parts of the equipment the next time. Sometimes the outcome is not so pleasant. Near-miss incidents like this one happen every day, but they are preventable.

NOTE: By OSHA Regulations and Compass Group, NA policies no associate under the age of 18 years of age is permitted to operate any powered equipment with an electric motor or internal combustion engine of any type. The single exception to this policy is vacuum cleaners.

Grinders, slicers, drill presses, buffers, forklifts and other powered equipment can make our jobs easier; however, machines like these can also pose serious hazards if they are not inspected, maintained and used properly. This discussion will address equipment safety training, use of personal protective equipment, inspections, hazards, and hazard controls.

Training

Training helps us use machines more efficiently and safely, and ongoing safety training is essential to prevent accidents. Equipment operators should try to learn every detail about their machine, including:

- General maintenance and unjamming procedures.
- Machine-specific hazards.
- How the guards protect you.

Do not take machine safety for granted. If you have any questions or concerns, contact your Supervisor immediately.

Inspections

The most important thing you may do all day happens before you actually start working with a machine. An inspection of your equipment should become part of your daily work routine. The purpose of this check is to ensure that your machine is in safe operating condition.

Equipment Inspection

NOTE: The following examples are supplied for reference only. Refer to the manufacturer's operating instructions for information on a specific piece of equipment.

- Make sure the area in and around your equipment is clean and tidy.
- Ensure all buttons and controls are clearly labeled and operational.
- If there are lights on the equipment, check that they are operating properly.
- Cycle the main power switch on and off, push and pull the emergency stop button, if equipped, to ensure they operate properly.
- Check all electrical wiring, switches, junctions, and lines for loose, broken, or frayed wires.
- Ensure that all electrical plugs on cords have ground pins, as required.
- Ensure that all guards are in-place and in good condition.
- Check air and hydraulic lines and couplings for leaks.
- Secure or move electrical cords, air lines, and hydraulic lines that are blocking the aisle ways.
- Check for oil leaks in, under, and around the equipment.
- Check to ensure you have adequate lighting to operate the machine.
- Check that the ventilation fans are functioning properly.

- Ensure all compressed gas cylinders, including fire extinguishers, are securely mounted to a permanent surface.

Having performed your inspection, you are now ready to operate your machine. An awareness of the hazards that your machine poses while in operation will help you operate it safely.

Equipment Hazards

In general, any moving machine parts pose a hazard if you are unaware of them. Any rotating object is dangerous, so it is important not to wear items that could get caught in machinery. Even smooth, slowly rotating shafts can grip loose fitting clothing, gloves, and jewelry. Keep hair covered by a hat or a hair net.

If your equipment becomes jammed or broken, it is critical that the equipment be properly locked out and tagged (refer to Section 4.10 or, if applicable, addendum 4) to ensure against accidental start-up.

Keep your work area and equipment clean, and wear the appropriate personal protective equipment (PPE) for the hazards associated with your equipment. For example, when working in the kitchen remember to wear heavy-duty cut-resistant gloves on both hands when cleaning the meat slicer. PPE is your last line of defense; guards and other devices represent your first line of defense against injury when operating machines.

Use of cell phones and headphones is prohibited.

Hazard Control

Guards and other devices allow you to operate equipment safely. It is in your best interest to make sure that they are functioning properly at all times. Besides guards, follow these simple preventive tips to ensure you stay out of the "Danger Zone".

NOTE: Due to the variety of equipment and tools in use by Compass Group, NA operations the examples below are not intended to be all inclusive. Refer to the manufacturer supplied operating instructions before using any equipment.

Powered Industrial Trucks and Golf Carts/Light Utility Vehicles (LUVs)

The hazards and safe work practices for these pieces of equipment are covered in sections 4.11 (Powered Industrial Trucks) and 5.4 (Golf Carts/LUVs) of this manual.

Fryers

- Maintain fryer oil level 3 inches from top of the fry vat.
- Never let liquids fall into the grease.
- Always put product into the basket and slowly immerse into oil.
- Always wear proper mitts when working with hot oil.
- When draining grease, use only approved containers. Never use plastic containers.
- Always use tongs or a basket to lift product from the fryer.
- Always follow the manufacturer's directions when filtering oil.

Ovens/Stoves

- If gas, be sure to check that the pilot light is on and the flame is burning blue.
- Make sure the oven door shuts and seals properly.
- Use clean, dry mitts when removing product from the oven.
- Do not let pot handles extend past edge of stove.

Slicers

- Never use the slicer without the guards in place.
- Never engage in conversation when using this type of equipment.
- Turn off slicer, unplug, and set dial to "0" when not in use.
- When required by design, use blade safety cover when cleaning or disassembling.

- Wear heavy-duty cut-resistant gloves on both hands when cleaning the slicer.
- Keep hands away from the blade.

Food Chopper/Processors

- Wear heavy-duty cut-resistant gloves on both hands when cleaning the chopper.
- Never put your hands in the chopper.
- Use a food tamper, not your hands, to push the food down from the sides.
- Be sure that all guards are in-place.
- Turn off the chopper and unplug it before disassembling to clean.

Steamer

- Be sure that the water level in the tube is at the proper level.
- Be sure that the door is closed and sealed properly.
- Never open the steamer door while it's still in operation.
- Crack the steamer door and stand away when first opened to avoid steam burns.
- Always use steamer gloves to remove product from steamer.

Tomato Slicer/Mandolin

- Never wash in the dishwasher.
- Never leave in the sink.
- Cut-resistant gloves should be worn when using and cleaning.
- Always store in clear view on a low shelf.

Flat Grill

- Use flexible turners or tongs to turn food.
- Carefully lay product on the grill; do not toss on and splatter grease.
- Always wear personal protective equipment when cleaning the grill.

Bench Grinder

- Always keep guards in place. The grinder must have wheel guards, side guards, and face guards.
- Properly secure work before starting the machine.
- Never stand directly in front of the wheel when first starting.
- Never run wheels faster than the recommended speed.
- Always wear eye protection including a face shield.
- Do not wear rings or other jewelry.

Drill Presses

- Do not wipe oil or chips from the drill while it is turned on.
- Be sure the chuck wrench is removed before starting the machine.
- Do not loosen the chuck until power is turned off.
- Make sure the part is properly clamped before reaming operations are conducted.
- Never hold the piece to be drilled, tapped, or reamed by hand.
- Proper eye protection must be used when operating the drill press.

Floor/Carpet Care Equipment

- Before using, always inspect the equipment for damage or disrepair. Inspect the electrical cord and plug for defects.
- If the equipment fails the pre-use inspection, notify your supervisor and remove the equipment from service. Tag or label the piece of equipment as inoperable.
- Connect to a properly grounded electrical outlet only.
- Never use equipment with a damaged electrical cord or plug.
- Do not run the equipment over electrical cords, door stops, or other obstructions.
- Always unplug unattended equipment.

- Do not yank on the electrical cord to disconnect equipment. Always grip the plug when disconnecting equipment.
- Never try to move equipment by pulling on the electrical cord.
- Use proper techniques to prevent back strain when lifting or moving equipment.
- Do not handle the plug or equipment with wet hands.

Buffers/Burnishers

Many injuries can occur from improper use of floor buffers/burnishers including contusions to feet, arms, and hands and strains to the back, neck, hips, wrists, and fingers. Most floor buffer injuries are avoidable and are due to operator inexperience or improper/inattentive operation and handling of floor buffers.

- Always keep both hands on the handles when operating a floor buffer.
- Always unplug the floor buffer before changing the buffing pad or cleaning block.
- Carefully operate a floor buffer across changes in floor surface texture to prevent strong pulling motions and loss of control of the buffer.
- Cleaning solutions used with a floor buffer will result in wet floor surfaces. Always post wet floor signs near the area being cleaned.
- Always unplug the floor buffer before performing maintenance or repairs.

Vacuum Cleaners and Carpet Extractors/Shampooers

NOTE: The following rules apply to all three types of equipment - extractors and shampooers have additional rules that are covered below

- Electric shock may occur if used outdoors or on wet surfaces.
- Use only manufacturer's recommended attachments.
- Do not put any object into openings on the equipment.
- Do not use with any opening blocked. Keep openings free of dust, lint, hair, and anything that may block or reduce air flow.
- Do not pick up anything that is burning or smoking, such as cigarettes, matches or hot ashes.
- Do not use without dust bag and/or filters in place.
- Use extra care when cleaning on stairs.
- Do not use to pick-up flammable or combustible liquids such as gasoline or use in areas where they may be present.
- DO NOT use where oxygen or anesthetics are used.
- Only hand-held equipment may be set on furniture.

Carpet Extractors

- Turn unit off immediately if foam or liquid comes from the machine's exhaust. Empty and clean out the recovery (dirty) tank and use defoamer to correct the problem.

Carpet Shampooers

- Do not use without dirty water reservoir in-place.

Floor Scrubbers

- Keep hands and feet clear of moving parts while machine is in operation.
- All switches must be in the "OFF" position when charging batteries.
- Do not operate near flammable materials such as solvents, thinners, fuels, grain dusts, etc.
- Make sure all switches are turned "OFF" and battery connections are removed before servicing.
- Store or park machine on a level surface only.
- These machines are typically intended for level floor operation only. DO NOT OPERATE on ramps or inclines unless designed for this purpose.
- When working on or around batteries, wear protective clothing and safety glasses. Remove metal jewelry. Do not lay tools or metal objects on top of batteries.
- DO NOT attempt to pick up hazardous dust(s).

- Charging batteries generate explosive gases. DO NOT CHARGE BATTERIES WHEN OPEN FLAMES OR SPARKS ARE PRESENT. DO NOT SMOKE. Make sure the charger is turned off before connecting or disconnecting batteries. Charge the batteries in a well-ventilated area.
- Maintenance and repairs must only be performed by authorized personnel.

Trash Compactors and Cardboard Balers

The volume of waste being removed from facilities is often reduced by compaction. These machines have hydraulic rams that operate on extremely high pressure that crush anything placed inside them. Compactor rams usually move forward/backward, while balers operate down/up.

Compactors

Waste compactors are generally fully enclosed and are removed by truck when full or on a pre-determined schedule. Schedules should be established so that the container does not become overfilled.

- These units are usually located at loading docks and sometimes have steel platforms that transition to them. The platforms must be regularly inspected to ensure their integrity.
- The operating mechanism must have a clearly identified emergency shut-off button and should be key or keypad operated. Keys should never be left in an unattended mechanism, nor should the mechanism be left in the “on” position when unattended.
- There should be a gate that must be closed and latched once the waste has been placed into the compactor hopper and before the ram is operated.
- Safety glasses and puncture resistant gloves should be worn when handling the waste and operating the compactor.

Balers

Balers are used mainly to compress cardboard to be recycled and are often somewhat open in the front and rear, in order to assist in determining when it is full and allow for easier removal of the bale.

- The operating mechanism must have a clearly identified emergency shut-off button and should be key or keypad operated. Keys should never be left in an unattended mechanism, nor should the mechanism be left in the “on” position when unattended.
- Full bales are bound by wire before removal from the baler. These wires must be put into place according to the manufacturer’s specifications.
- When a bale is ready for removal from the baler, a flatbed dolly should be placed in front of the baler, with wheels locked so that it won’t move. Open the door to the baler, bind the bale with wire as indicated above, go to the rear of it and push the bale onto the flatbed. Seek assistance, if necessary, when pushing bales onto or removing bales from the flatbed.
- Safety glasses and heavy duty gloves should be worn when loading and operating a baler.

Hand/Portable Tools

Hand/portable tools and equipment will be reviewed during departmental orientation. Training will be repeated as often as necessary to comply with the requirements of all regulatory and accrediting agencies and when a new hazard is introduced.

Hand Tools

- Each supervisor must be responsible for the safe condition of tools and equipment used by associates, including tools and equipment which may be furnished by associates.
- All hand tools must be kept in safe condition. Handles of tools must be kept tight in the tool, and wooden handles must be free of splinters or cracks. Wedges, chisels, etc., must be free of mushroomed heads. Wrenches must not be used when sprung to the point that slippage occurs.
- The frames of portable electric tools and equipment must be properly grounded except when endowed with U.L. approved double insulated construction.
- Electric powered tools and equipment showing worn, deteriorated, or inadequate insulation or other parts must be removed from service and repaired or replaced.

Portable Powered Tools (Pneumatic)

- For portable tools, a tool retainer must be installed on each piece of utilization equipment which, without such a retainer, may eject the tool.
- Hose and hose connections used for conducting compressed air to utilization equipment must be designed for the pressure and service to which they are subjected.

Machine Guards

Machine tool guarding will be reviewed during departmental orientation. Training will be repeated as often as necessary to comply with the requirements of all regulatory and accrediting agencies and when a new hazard is introduced.

Machine guarding shall be provided to protect associates in the machine area from hazards. Hazards include those at the point-of-operation, nip-points, rotation-parts, flying chips and sparks. The guard shall not offer a hazard in itself.

The point-of-operation guarding device shall be so designed as to prevent the operator from having any part of his body in the danger zone during the operating cycle. Machines that require point-of-operation guarding include:

- Mixers
- Slicers
- Cutters
- Shears
- Grinders
- Power saws
- Power presses
- Linen Presses
- Ironers
- Folders

NOTE: Most manufacturers provide machinery with appropriate point of operation guarding, however it the responsibility of the supervisor to ensure its proper use and maintenance at all times.

Special supplemental hand tools for placing and removing material shall permit handling of material without the operator placing a hand in the danger zone.

Guarding shall be provided in operations involving the cleaning with compressed air. Effective guarding includes protective shields or barriers and personal protective equipment.

Compressed air used for cleaning shall not exceed 30 psi when the nozzle end is obstructed or dead-ended. Personal protective equipment must be used while cleaning.

The specific steps, tasks, and actions required to carry out this policy will result from your application of the above policy criteria to your operation.

Additional Training

For additional training, refer to the applicable Compass Safety Minders and the Compass Corporate Safety website.

Final Thoughts

Safe equipment operation requires diligence, skill, and an attention to detail. Rely on your training, perform regular inspections, identify hazards (Stop, Think, Act), make sure that guards and devices are working properly and always use required personal protective equipment. You will find that you are operating your machine more safely and are avoiding “near misses” that could eventually become an accident.

4.9 Hazard Communication

The purpose of this program is to inform interested persons, including associates, that Compass Group is complying with the OSHA Hazard Communication Standard (HCS), Title 29 Code of Federal Regulations 1910.1200, by compiling a hazardous chemicals list, using Safety Data Sheets (SDS's), ensuring that containers are labeled, and providing our associates with training and information availability.

This program applies to all work operations in our company where associates may be exposed to hazardous substances under normal working conditions, or during an emergency situation.

The Compass Group Corporate Safety Department is the program coordinator, acting as the representative of the Unit Manager, who has overall responsibility for the program. The Safety Department will review and update the program, as necessary. Copies of the written program may be obtained from the Unit Manager in their office.

All associates, or their designated representatives, can obtain further information on this written program, the hazard communication standard, applicable SDS, and chemical information lists from the Unit Manager in their office. Under this program, our associates will be informed of the contents of the Hazard Communication Standard, the hazardous properties of chemicals with which they work, safe handling procedures, and measures to take to protect themselves from these chemicals.

If after reading this program, you find that improvements can be made, please contact the Compass Group Corporate Safety Department. We encourage all suggestions because we are committed to the success of our written hazard communication program. We strive for clear understanding, safe behavior, and involvement in the program from every level of the company.

Hazard Evaluation Procedures

Our chemical inventory is a list of hazardous chemicals known to be present in our workplace. Anyone who comes into contact with the hazardous chemicals on the list needs to know what those chemicals are and how to protect themselves. That is why it is so important that hazardous chemicals are identified. The hazardous chemicals on the list can cover a variety of physical forms including liquids, solids, gases, vapors, fumes, and mists. Identification of hazardous chemicals requires an actual inventory of the facility. As new chemicals are added or old chemicals are phased out, the Unit Manager will ensure the chemical inventory is updated.

The Unit Manager keeps a copy of the chemical inventory list, along with related work practices used in our facility located in the Unit Manager's Office, as well as in the main chemical storage area where it is accessible during work hours.

The company does not manufacture any chemicals and, therefore, does not make any hazard determinations.

After the chemical inventory is compiled, it serves as a list of every chemical for which an SDS must be maintained.

Global Harmonization System- (GHS)

OSHA has chosen to incorporate the GHS of Classification and Labeling of Chemicals to; account for changes in the labor force, adapt to globalization and increase associate Safety. The GHS enhances the former Hazard Communication Standard (HCS) by specifying formats for chemical labeling and Safety Data Sheets (SDS). Much of the old HCS has not changed. By adopting this GHS for labeling, every chemical supplier will use the same verbiage, pictograms and messages on their labels to convey hazards. Workers should be able to better understand the descriptions on the labels. The GHS covers all hazardous chemicals, there are no complete exceptions from the scope of the GHS for a particular type of chemical or product, since chemicals can be very dangerous if not diluted and used correctly. Thus the term "chemical" includes any substance, product, mixture, preparation or any other terms that may be

used, or referenced, by the SDS.

Pharmaceuticals, food additives, cosmetics and pesticide residues in food are not covered by the GHS at the point of consumption, but are covered where associates may be exposed (workplaces) and in transportation. (Foods are not generally labeled under the existing HCS).

GHS has identified 3 broad categories of hazards- Health Hazards, Environmental hazards and Physical Hazards.

Labeling

Labels are intended to provide an immediate reminder of the chemical hazards, as June 1, 2015 all labels will be required to include the following:

- Product Identifier: The name used on a GHS label should match the product identifier used on the SDS. It lists the chemical identity of the hazardous substance.
- Supplier Identification: The name, address and telephone number of the manufacturer or supplier of the product must be listed on the label.
- Pictograms: Make warnings more noticeable and easier for associates to understand. The specific pictogram required on a particular label is determined by the hazard classification.
- Hazard Statements: It is based on the hazard classification of the chemical. A statement should be present for each type of hazard and multiple statements may be combined.
- Signal Word: Either one of the following signal words must appear;
 - DANGER for the more severe hazard categories
 - WARNING for less serious hazards
 - If Danger appears on the label, the word Warning will not appear
- Supplemental Information: Non-harmonized information that is not required or specified under GHS. It could be information required by a competent authority.
- Precautionary Statements: Also based on the hazard classification of the chemical. It describes recommended measures that should be taken to protect against hazardous exposures, improper storage, or handling the chemicals. It includes first aid procedures.

NOTE: Only labels produced by the chemicals manufacturer are authorized. These labels can be either part of a permanently labeled spray bottle or peel and stick labels that are applied to a blank bottle.

If associates transfer chemicals from a labeled container to a portable container that is intended only for their IMMEDIATE use, (such as a dining operations sanitizer buckets) no labels are required on the portable container.

No other alternatives to labeling are used in this workplace.

Additional Labeling Required for California Operations

In Accordance with CALOSHA Standard 5194:

- Local Management shall ensure that each container of hazardous chemicals in the workplace is labeled, tagged, or marked with either: Product identifier and words, pictures, symbols, or combination thereof, which provide at least general information regarding the hazards of the chemicals, and which, in conjunction with the other information immediately available to associates under the hazard communication program, will provide associates with the specific information regarding the physical and health hazards of the hazardous chemical.
- As an alternative signs, placards, process sheets, batch tickets, operating procedures, or other such written materials in lieu of affixing labels to individual stationary process containers, as long as the alternative method identifies the containers to which it is applicable and conveys the information required. The written materials shall be readily accessible to the associates in their work area throughout each work shift. In construction, the employer may use such written materials in lieu of affixing labels to individual containers as long as the alternative method identifies and accompanies the containers to which it is applicable and conveys the information required to be on a label.

- Although labels are not required by CALOSHA Standard 5194 for portable containers into which hazardous chemicals are transferred from labeled containers, and which are intended only for the immediate use of the associate who performs the transfer, Compass Group, NA policy does require all containers, except sanitizer buckets used in dining operations to be properly labeled.
- Existing labels may not be removed or intentionally defaced on incoming containers of hazardous chemicals, unless the container is immediately marked with the required information.
- Workplace labels or other forms of warning are legible, in English, and prominently displayed on the container, or readily available in the work area throughout each work shift. Operations having associates who speak other languages may *add* the information in their language to the material presented, as long as the information is presented in English as well.

Hazard Chemical List

A chemical inventory (Refer to the chemical inventory template) is a list of hazardous chemicals known to be present in the workplace. Anyone who comes into contact with the hazardous chemical on the list needs to know what the chemical is and how to protect him/her. That is why it is so important that hazardous chemicals are identified, whether they are found in a container or generated in work operations (for example, welding fumes, dusts, and exhaust fumes). The hazardous chemicals on the list can cover a variety of physical forms including liquids, solids, gases, vapors, fumes, and mists. Identification of hazardous chemicals requires an actual inventory of those being used within the specific account and/or facility. As new chemicals are added or old chemicals phased out, the Account/Contract Manager will ensure the chemical inventory and SDS Binder is updated.

The Account/Contract Manager keeps the chemical inventory list, along with related work practices used in the account/facility, in his/her office, as well as in the main chemical storage area, where it is accessible during all work hours. NOTE: OSHA considers it a barrier in an associate has to access SDS through a manager or supervisor.

After the chemical inventory is compiled, it serves as a list of every chemical for which an SDS must be maintained.

NOTE: This listing should be reviewed and, if required, updated annually. Review dates should be noted on the index sheet upon completion.

Safety Data Sheets- (SDS) (Formerly known as Material Safety Data Sheets or MSDS)

The SDS contain 16 sections: Product and Company Identification, Hazard Identification, Composite/Ingredients, First Aid Measure, Firefighting Measures, Accidental Release, Handling and Storage, Exposure Control/PPE, Physical and Chemicals Properties, Stability and Reactivity, Toxicological Information, Ecological Information, Disposal Considerations, Transport Information, Regulatory Information and Other Information.

The Right to Understand requires each chemical that associates use, or may be exposed to during their normal duties, must be supported by a Safety Data Sheet (SDS). These documents must be placed in a 3-ring binder with a Chemical Inventory List, so that an SDS can quickly and easily be found, if needed. To ensure speed in the event of an emergency the SDS in the binder must be identified with a numbered, or lettered, tab which is referred to in the chemical inventory.

Local managers are responsible for ensuring these SDS binders are current and directly accessible to all associates. When a new chemical product arrives or a product is no longer in use, the binder must be updated. In addition, management is responsible for ensuring associates are familiar with the contents of the SDS binder and know where it is located. These sheets have information on the items listed above.

If an associate comes into contact with a product (i.e. eyes, skin, etc.), the SDS will provide instructions on how to treat the injury. The SDS also has instructions on how to clean up a spill.

If a Safety Data Sheet is needed for a new chemical or one is missing for an existing chemical, contact the vendor for a new SDS.

In addition to English Safety Data Sheets, where available, SDS's in the native language of non-English speaking/reading associates must be available. Contact the chemical supplier for assistance.

Chemicals used can be very dangerous if not used or stored correctly. Failing to use Personal Protective Equipment (PPE) as specified on the SDS or product label can result in serious injury.

According to Compass Groups' Workers' Compensation statistics, the most common chemical injuries occur to the eyes and hands. Be proactive and ensure that associates are wearing gloves and eye protection when handling or using chemicals. Failing to wear PPE when required could result in temporary blindness or severe chemical burns to the skin.

Associates who fail to follow procedures should be retrained and/or counseled. In addition, when making rounds identify that chemicals are safely stored. Any improperly labeled or unlabeled bottles should be removed and either emptied and washed or discarded accordingly. Remove from service any container designed to be used in an automatic dispenser that has been damaged in order to create a dilution rate different than designed.

Training

Everyone who works with or is potentially "exposed" to hazardous chemicals will receive initial training and any necessary retraining on the Hazard Communication Standard and the safe use of those hazardous chemicals by the Unit Manager. "Exposure" means that "an associate is subjected to a hazardous chemical in the course of employment through any route of entry (inhalation, ingestion, skin contact or absorption, etc.) and includes potential (e.g., accidental or possible) exposure." Whenever a new hazard is introduced or an old hazard changes, additional training is provided.

Information and training is a critical part of the hazard communication program. We train our associates to read and understand the information on labels and SDS's, determine how the information can be obtained and used in their own work areas, and understand the risks of exposure to the chemicals in their work areas as well as the ways to protect themselves.

Our goal is to ensure associate comprehension and understanding, including being aware that they may be exposed to hazardous chemicals, knowing how to read and use labels and SDS's, and appropriately following the protective measures we have established. We encourage our associates to ask the Unit Manager questions. As part of the assessment of the training program, the Unit Manager asks for input from associates regarding the training they have received, and their suggestions for improving it. In this way, we hope to reduce any incidence of chemical related illnesses and injuries.

Training Content

All associates must receive instruction on all chemicals/chemical hazards present in the facility. Associates are trained on specific hazardous chemicals.

The training plan emphasizes these elements:

- Summary of the standard and this written program, including what hazardous chemicals are present, the labeling system used, and access to SDS information and what it means.
- Physical hazards of chemicals (e.g., potential for fire, explosion, etc.).
- Health hazards, including signs and symptoms of exposure, associated with exposure to chemicals and any medical condition known to be aggravated by exposure to the chemical.
- Procedures to protect against hazards (e.g., engineering controls; work practices or methods to assure proper use and handling of chemicals; personal protective equipment required and its proper use and maintenance; and procedures for reporting chemical emergencies).

Training on the Hazard Communication Program is a requirement for all new associates. It is the responsibility of the Unit Manager to ensure total compliance. Additionally, every time a new hazard is introduced into the work place (i.e. new chemical), follow-up training on the new hazard is required. Of particular importance is training on proper Personal Protective Equipment (PPE) required for use, and the

first aid treatment necessary should an exposure incident occur. Documentation for all training should be placed in the associate's training file. Documentation should be maintained for the entirety of the associate's employment, and should then be maintained as long as the personnel file is maintained.

Rights and Responsibilities of Associates (Right to Understand)

Associate RIGHTS- you have the right to:

- Be trained concerning the hazards associated with the substances in your workplace.
- Have direct access to the List of Chemicals and Safety Data Sheet (SDS) for hazardous substances in your workplace.
- Be provided with a copy of the List of Chemicals you work with, as well as the corresponding SDS.
- Refuse to work with a hazardous substance if you are denied access to information about the substance.

Associate RESPONSIBILITIES- you are responsible to:

- Know your rights under the Hazard Communication Program.
- Know where to get information about hazardous substances in your workplace.
- Learn to read and understand labels and SDS's.
- Identify hazards before you begin a job and to keep your work area clean.
- Use appropriate safe work practices and proper personal protective equipment (PPE).
- Follow proper procedures for clean-up and disposal of hazardous substances.
- ASK questions if you are unsure of safe work practices.

Hazards of Non-routine Tasks

When associates are required to perform any hazardous, non-routine tasks that have the potential to expose associates to hazardous chemicals, we inform associates of these hazards on-the-spot by way of the Unit Manager.

Multi-Employer Facility

When contractors or any other employer's associates (i.e., painters, electricians, plumbers, etc.) will be working at this workplace, the Unit Manager will:

- Provide the other employer(s) with SDS's for any of our chemicals to which their associates may be exposed in the following manner: All SDS's are posted in the general vicinity of the chemical itself, either in the storage area or at the point of use; and
- Relay necessary label and/or emergency precautionary information to the other employer(s) in the following manner: the Unit Manager is directly responsible for personally informing the contractor of any labeling and/or emergency precautionary information.

Each contractor bringing chemicals on-site must provide the Unit Manager with the appropriate hazard information on these substances, including the SDS's, the labels used and the precautionary measures to be taken in working with these chemicals.

Additional Information

If at any time during the work cycle an associate has a question or concern about a substance or hazard they are exposed to in the workplace, they should immediately seek out the SDS or their supervisor to ensure they are afforded the safest work environment possible. All associates, or their designated representatives, can obtain further information on this written program, the hazard communication standard, applicable SDS's, and chemical information lists from the Unit Manager.

Additional Training

For additional training, refer to the applicable Compass Safety Minders and the Compass Corporate Safety website.

4.10 Lockout/Tagout (Control of Hazardous Energy)

The following information is provided to assist Compass Group operations in developing procedures to meet safety requirements for controlling hazardous energy using lockout/tagout techniques.

NOTE: This section of this manual is intended for Vending, Dining, EVS, PT, and Valet operations ONLY! Laundry, POM, Facilities management and HTS operations, which have more specific requirements/guidelines, are covered in addendum 4 to this manual.

This program establishes recommended minimum requirements for the lockout/tagout of energy isolating devices. It shall be used to ensure that the machine or equipment is stopped, isolated from all potentially hazardous energy sources and locked out before energizing or starting-up of the machine or equipment or release of stored energy could cause injury. When the energy isolating devices are not lockable, a tagout device may be used, provided additional training and more rigorous periodic inspections are accomplished.

All Compass Group operations are expected to establish site-specific procedures for the control of hazardous energy. An energy control program shall consist of energy control procedures, associate training and periodic inspections.

Please note that most small equipment items (i.e., slicers, choppers, buffers, vacuum cleaners, etc.) only need to be unplugged with the operator maintaining positive control of the plug during cleaning, servicing or moving to be in compliance. Operations with equipment that is hard-wired should contact their Corporate Safety Manager for assistance in developing a plan.

Responsibilities

Corporate Safety Managers:

- Assist with training as appropriate.
- Monitor program compliance.
- Respond to questions

Unit Manager and/or District Safety Champion:

- Provide appropriate lockout/tagout training for affected associates.
- Develop site-specific procedures for lockout/tagout of equipment.
- Provide necessary equipment for the program.
- Conduct periodic inspections to assure program compliance.

Associates:

- Comply with the restrictions and limitations during use of lockout/tagout.
- Perform the lockout/tagout in accordance with established procedures.

Definitions

Lockable

An energy-isolating device is capable of being locked out if it has a hasp or other means of attachment to which, or through which, a lock can be affixed, or it has a locking mechanism built into it. NOTE: Some equipment is not equipped with built-in lockout devices. For this equipment it will be necessary to purchase a means of locking it out. Contact your Corporate Safety Manager for guidance.

Lockout

The placement of a lockout device on an energy-isolating device in accordance with an established procedure, thus ensuring that the energy isolating device and the equipment being controlled cannot be operated until the lockout device is removed.

Tagout

The placement of a tagout device on an energy-isolating device in accordance with an established procedure to indicate that the energy-isolating device and the equipment being controlled may not be operated until the tagout device is removed.

Tagout Device

A prominent warning device, such as a tag and a means of attachment, which can be securely fastened to an energy isolating device in accordance with an established procedure to indicate that the energy isolating device and the equipment being controlled may not be operated until the tagout device is removed.

Authorized Associate

A person who locks out or tags out machines or equipment in order to perform servicing or maintenance on that machine or equipment. An affected associate becomes an authorized associate when that associate's duties include servicing or performing maintenance covered under this section.

Energy Isolating Device

A mechanical device that physically prevents the transmission or release of energy, including but not limited to the following: a manually operated electrical circuit breaker; a disconnect switch; a manually operated switch by which the conductors of a circuit can be disconnected from all supply conductors and, in addition, no pole can be operated independently; a block; and any similar device used to block or isolate energy. *Push buttons, selector switches and other control circuit type devices are not energy isolating devices.*

Sequence of Lockout

1. Notify all affected associates that servicing or maintenance is required on a machine or equipment and that the machine or equipment must be shut down and locked out to perform the servicing or maintenance.
2. The authorized associate shall use established procedures to identify the type and magnitude of the energy that the machine or equipment utilizes, shall understand the hazards of the energy, and shall know the methods to control the energy.
3. If the machine or equipment is operating, shut it down by the normal stopping procedure (depress stop, open switch, close valve, etc.).
4. Turn off power to the equipment at the power source(s).
5. Place a lock on the power source(s) using assigned individual lock(s), OR, place a tag on the power source(s) using assigned individual tag(s).
6. Stored or residual energy (such as that in capacitors, springs, elevated machine members, rotating flywheels, hydraulic systems, air, gas, steam, or water pressure, etc.) shall be dissipated or restrained by methods such as grounding, repositioning, blocking, bleeding down, etc.
7. Ensure that the equipment is disconnected from the energy source(s) by first checking that no personnel are exposed, then verify the isolation of the equipment by operating the push button or other normal operating control(s), or by testing to make certain the equipment will not operate. Caution: Return operating control(s) to "off" or "neutral" position after verifying the isolation of the equipment.
8. The machine or equipment is now locked out.

Restoring Equipment to Service

When the servicing or maintenance is completed and the machine or equipment is ready to return to normal operating condition, the following steps shall be taken:

1. Check the machine or equipment and the immediate area around the machine or equipment to ensure that nonessential items have been removed and that the machine or equipment components are operationally intact.
2. Check the work area to ensure that all associates have been safely positioned or removed from the area.
3. Verify that the equipment's controls are switched to "off" or "neutral".

4. Remove the lockout devices and re-energize the machine or equipment.
Note: The removal of some forms of blocking may require re-energizing the machine before safe removal can be accomplished.
5. Notify affected associates that the servicing or maintenance is completed and the machine or equipment is ready for use.

Full Associate Protection - (Tagout Procedures)

When a tagout device is used on a power source that is capable of being locked out, the tagout device shall be attached at the same location that the lockout device would have been attached, and the tag will provide a level of safety equivalent to that obtained by using a lockout.

Training and Communication

Training shall be provided to all affected Compass Group associates to ensure that they understand the purpose and function of the energy control program and so that the knowledge and skills required for the safe application, usage, and removal of energy controls are acquired by associates. The training shall include the following:

- Each authorized associate shall receive training in the recognition of applicable hazardous energy sources, the type and magnitude of the energy available in the workplace, and the methods and means necessary for energy isolation and control.
- Each affected associate shall be instructed in the purpose and use of energy control procedures.
- All other associates whose work operations are or may be in an area where energy control procedures may be utilized shall be instructed about the procedure, and about the prohibition relating to attempts to restart or re-energize machines.

Additional Training

For additional training, refer to the applicable Compass Safety Minders and the Compass Corporate Safety website.

4.11 Powered Industrial Truck Safety

Powered industrial trucks refers to the different kinds of transportation items and vehicles used to move materials and products in materials handling. These transportation devices can include small hand-operated trucks, pallet-jacks, and various kinds of forklifts. These trucks have a variety of characteristics to make them suitable for different operations. Some trucks have forks, as in a forklift, or a flat surface with which to lift items, while some trucks require a separate piece of equipment for loading. Trucks can also be manual or powered lift and operation can be walk or ride, requiring a user to manually push them or to ride along on the truck.

IMPORTANT NOTE: If you are operating in a state with a state-specific OSHA program there may be additional requirements to those listed below. Please contact your Corporate Safety Manager for assistance.

There are many types of industrial trucks:

Hand trucks
Pallet jacks
Pallet trucks
Walkie stackers
Platform trucks
Order picker
Sideloaders
Many types of AGV

NOTE: Specific information concerning aerial lifts and landscaping equipment are contained in Addendums 19 and 20 respectively.

Training Responsibilities

Management is responsible for ensuring that all associates who operate powered industrial trucks receive documented training as outlined below.

The Unit Manager is responsible to document training for all powered industrial truck operators at the time of hire and every three years thereafter. This documentation must be kept on-file in the unit for inspection by safety personnel or regulatory agencies.

IMPORTANT NOTE: Training on powered industrial trucks of any type must only be conducted by a qualified instructor.

Training Overview

Powered industrial truck safety training will include, but not be limited to, instruction in the following elements:

- Responsibilities of those involved in the program.
- Demonstrations by the trainer and practical exercises by the associate of the powered industrial trucks controls and their function.
- An explanation of items to be inspected before operating the powered industrial trucks.
- Hazards associated with operating a powered industrial trucks.
- Forklift safety rules.
- Proper conduct for driving a powered industrial trucks.
- Steps to take when leaving a powered industrial trucks unattended.
- An evaluation of the driver's performance in the workplace with the associate steering and maneuvering the powered industrial trucks while observed by the trainer.

NOTE: Due to the wide variety of material handling equipment in use by Compass Group, NA operations we cannot provide specific information. Consult the manufactures operating manual(s), the contractor that services the equipment, your Corporate Safety Manager or any combination of the three for details or assistance.

Powered Industrial Truck Safety Rules

It is essential that all powered industrial trucks drivers obey the following rules:

- Only associates who have written certification from management may operate powered industrial trucks.
- Each operator must inspect their vehicle before operating it and ensure that all safety equipment (brakes, Horn, etc.) is in good working order. If repairs are needed, do not operate the vehicle. Report any malfunction to your supervisor immediately and tag the vehicle as “OUT OF ORDER.”
- Look in the direction of travel at all times. Keep clear view of where you are going. Drive in reverse (except up slopes).
- Keep arms and feet inside the lift at all times.
- Forks must be kept in a lowered position (6 inches or less from the floor) when the truck is moving and completely down when parked.
- Use of the truck for horseplay or stunt driving is prohibited.
- Never lift an unstable load. Be sure you have clearance to move the load safely through aisles and doors and under any overhead obstruction.
- Should an accident occur or damage be done with the truck, it must be reported immediately.
- Trucks must stop and sound horn at all intersections and when backing up.
- Do not unload a trailer unless the trailer wheels are chocked and the brakes are set.
- Riders are never permitted and forks shall not be used to raise or lower a person.
- Pedestrians always have the right of way.
- Loads must be centered at all times.
- Battery chargers must be turned off before being connected to the truck.
- Safety goggles and protective rubber gloves must be worn when performing battery maintenance.
- Battery water levels must not be overfilled.
- Powered industrial trucks must be turned off with the key removed when not in use, out of sight or when the driver is 25 feet or more away.
- Forklifts must be operated from the driver's seat only.
- Propane canisters must be securely stored at all times.
- Forks must be inserted fully under each load.
- Keep loads within the capacity of the truck.
- Properly space forks to lift load.
- Do not use forks to nudge materials.
- The load leads when going up inclines. The load follows when going down inclines.
- Look in all directions before moving and keep the powered industrial truck under control at all times.
- Be prepared for emergency stops.
- All forklifts must be equipped with an overhead guard.
- Never use a forklift as an elevator or personnel carrier.
- Supervisors are responsible for ensuring that operators comply with these instructions.
- Seat belts must be used when operating a Forklift
- The use of eye protection is mandatory if the equipment does not have an enclosed cab.
- Equipment must have a working signal alarm while backing up.

Refueling the Vehicle

If equipped with a gas/diesel engine:

- Do not smoke, avoid areas with open flames
- Shut off engine
- Check the fuel before starting to operate.
- Fill the fuel tank(s) as needed.
- Only use NFPA approved fuel cans.
- Ensure filler nozzle is in contact with the tank
- Wear the appropriate PPE

NOTE: Propane tanks that are used with the operation of powered industrial trucks are designed with the components necessary for UL approval. Powered industrial trucks should not be operated with tanks that



are not UL approved for machine use. Do not use tanks that are designed for gas grills as they can create dangerous operating conditions.

Additional Training

For additional training, refer to the Compass Corporate Safety website.

4.12 Emergency Evacuation/Action – Getting Out In One Piece

IMPORTANT NOTE: This section addresses emergency evacuation procedures ONLY and should not be confused with Emergency Action Plans which are addressed in Addendum 15

- It has been determined that in the best interest of all Compass Group North America associates, the official company policy be the immediate and total evacuation of ALL associates from the workplace upon activation of a fire or other emergency alarm. This will require that each operation develop a written emergency action plan as well as posting evacuation routes and establishing a “rally point” where roll can be taken to account for all associates.
- Many of our clients will have an evacuation plan that they require us to participate in. This section is provided for use in units where the client has not specifically requested Compass Group North America associates follow their plan.
- It is the responsibility of the unit manager and/or the District Manager to determine the exact actions to be taken at each location.

Meeting Leader: *Your presentation will be most effective if you do not read this word for word, but rather use it as an outline for your discussion. Use your personal knowledge and experience to further customize and support the information in the talk.*

There may come a time when the evacuation of this facility is required. Fire alarms, bomb threats, and gas leaks are only a few examples of what may lead to this need. This discussion will address our actions in the event an evacuation is called for.

Evacuation Procedures

In an emergency, you will not have the time to stop and review evacuation procedures. Therefore, it is essential to know what to do before an emergency happens, so make sure you learn the evacuation procedures for your facility. It is especially important to identify the location of the nearest emergency exit.

Meeting Leader: *Discuss the emergency evacuation plan appropriate to the personnel present at the meeting. Clear up any confusion or questions that the associates have and remind them that you are available to speak with them if they have any questions in the future. Schedule a drill to practice your evacuation procedures with the group.*

Some specific Emergency Action Plans (Again, seek out your clients plan first!)

NOTE: The emergency action, whether it's the Clients or one developed by the local Compass Group, NA management team, plan MUST be made available, in writing, for all associates to review. If your operation has less than 10 associates the plan may be communicated verbally.

Please remember that regardless as to whether a site is using a client mandated program or the material(s) on the following pages to develop a local process ALL associates must be aware that all emergency situations are to be reported to the onsite manager/supervisor immediately.

Medical Emergency

If a Compass Group associate receives a life-threatening injury:

- 1) The Manager shall immediately call 911 to begin local emergency response;
- 2) The first on-scene associate shall standby until professional medical assistance arrives, and provide medical assistance, if able to.
- 3) An associate shall be sent outside to await incoming emergency vehicles;
- 4) Perform necessary medical management including appropriate first aid and CPR procedures if certified and deemed necessary.

If the determination is made that helicopter transport is necessary for the injured associate, a landing zone shall be prepared to receive the incoming unit. The local authorities will appoint the designated landing zone. Upon summoning the helicopter, police shall be notified to close off the area to traffic so that the unit will be able to land with minimal interference.

Natural Disaster

If a natural disaster such as a tornado or hurricane has been forecast or is imminent for the area, the following actions shall be taken:

- 1) A member of the Management Team shall notify all associates of the warning via the intercom system if available, and instruct associates to assemble in the building's shelter area.
- 2) Upon hearing the notification of the warning, all associates shall gather in the designated shelter area for the building.
- 3) When all associates have gathered in the shelter area, the Evacuation Supervisors shall take a head count.
- 4) If it is determined that associate(s) are missing, the Evacuation Supervisors shall re-check the facilities, provided it is safe to do so.

NOTE: It is advised that the following are kept ready for use in each building's shelter area:

- Portable emergency band radio
- Portable transistor radio
- Flashlight(s)
- Spare Batteries
- First Aid Kit

Bomb Threat

If an outside individual phones in a bomb threat to Compass Group, the individual taking the call shall attempt to obtain as much information as possible from the caller. The individual shall stay on the telephone until the caller hangs up first, and then take the following actions:

- 1) The individual shall immediately notify a member of the management team.
- 2) The individual shall notify all internal associates via the intercom system if available with the following announcement: "*May I have your attention please? We have an emergency in the building. Please evacuate the building immediately.*" The individual making the announcement shall not specify the nature of the emergency situation during the announcement.
- 3) The individual shall call 911 to begin local emergency response.
- 4) The evacuation announcement shall be repeated at least once.
- 5) All associates shall gather at the designated meeting point after evacuating the building.
- 6) The Management Team and the individual taking the call shall wait outside for emergency personnel.

NOTE: IN ALL BOMB THREAT SITUATIONS, ASSOCIATES ARE TO CONSIDER THE THREAT TO BE SERIOUS AND TO TAKE EMERGENCY ACTION IMMEDIATELY.

If a suspicious package or parcel is found on Compass Group premises

- The associate who discovers the package shall immediately notify a member of the Management Team.
- The building shall be evacuated following the same procedure as for a bomb threat.
- The Manager shall call 911 to begin local emergency response.

NOTE: ASSOCIATES IN THE VICINITY OF A SUSPICIOUS PACKAGE OR PARCEL SHALL IMMEDIATELY TURN OFF ALL PAGERS, CELLULAR TELEPHONES, TWO-WAY RADIOS, OR ANY OTHER ELECTRONIC DEVICES; ASSOCIATES *SHALL NOT* USE THESE DEVICES IN THE IMMEDIATE SURROUNDING AREA OF A SUSPICIOUS PACKAGE OR PARCEL.

Civil Disturbance

If a civil disturbance (i.e., protest, large crowd, strike) occurs or is imminent, the Management Team shall take the following actions:

- 1) 911 shall be called to begin local emergency response.
- 2) All doors, windows, gates, or other points of access shall be locked and secured.

- 3) All machinery, tools, and equipment shall be turned off.
- 4) Associates shall gather at a safe location within the building, away from windows and doors.
- 5) Prior to the start of their shift, all in-coming associates shall be contacted and informed to remain at home.

Active Shooter

An Active Shooter is a situation where one or more suspects participate in a random or systematic shooting spree, and demonstrating intent to continuously harm others. The overriding objective appears to be that of inflicting serious bodily injury/death rather than other criminal conduct. These situations are dynamic and evolve rapidly, demanding immediate deployment of law enforcement resources to stop the shooting and mitigate harm to innocent victims.

In a Classroom or Office:

- If you are in a classroom, room or office, **STAY THERE**, secure the door and turn off the lights.
- Remain silent.
- If the door has no lock and the door opens in, a heavy door wedge can be kept on hand and used, otherwise look for heavy furniture to barricade the door. If the door has a window, cover it.
- If the windows don't open, or you cannot break them, or you are not on a ground floor, get out of sight from the door and stay low and quiet.

If no police units are on scene, move well away from the incident and find safe cover positions (not the parking lots) and wait for the police to arrive. When police officers arrive, **KEEP hands on top of your head and do exactly what the Police tell you to do.**

In Kitchens, Hallways or Corridors:

- Stay low to the floor.
- Unless you are very close to an exit, don't run through a long hall or open kitchen area to get to one as you may encounter the gunmen or hostage taker.
- Exit the facility, if possible. If you cannot exit the facility, get into a room that is not already secured and secure it.
- If the door has no lock and the door opens in, a heavy door wedge can be kept on hand and used, otherwise look for heavy objects to barricade the door. If the door has a window, cover it.
- Remain silent.

In Servery, Other Large Rooms or Auditoriums:

- If in the servery or other similar large area and the gunmen are not present, move to and out the external exits and move toward any police unit. Drop all bags and keep your hands on your head. **Do what the police tell you to do.**

Loading Docks and Other Open Spaces;

- If possible, move away from the building and toward any police unit. Stay alert and, if necessary, look for appropriate cover locations. Hard cover, such as brick walls, large trees, retaining walls, parked vehicles, and any other object that may stop bullets, may be utilized as cover.

What to Expect from Responding Police Officers

Police officers responding to an active shooter are trained to proceed immediately to the area where the shots were last heard; their purpose being to stop the shooting as quickly as possible. The first responding officers may possibly be from different police agencies and dressed in different uniforms. They may even be in civilian clothes and wearing an external bulletproof vest. Regardless of how officers appear, remain calm. Do as the officers tell you, and do not be afraid of them. **Be prepared** and understand that until they get detailed information responding police will likely treat EVERYONE as a potential suspect. Put down any bags or packages that you are carrying and keep your hands visible at all times.

If you know where the shooter is, or know the shooter's description, tell the officers.

The first officers to arrive will not stop to aid injured victims. Rescue teams will follow shortly after the first responding officers enter the area. They will attend to the injured and remove everyone safely from the area.

Keep in mind that once you have escaped to a safer location, the entire area is still a crime scene. Police will usually not let anyone leave until the situation is under control and witnesses have been identified. Until you have been released, remain at whatever assembly point authorities designate.

What else can you do? Prepare a plan of action for an active shooter in advance.

Determine possible escape routes and know where the nearest building exits are.

Other Emergency Scenarios

In the event of a unique emergency situation, (including, but not limited to) robbery, vehicle accident, hostage situation, etc.), the Management Team and the Compass Group Crisis Management Hotline (877-710-6291) shall immediately be notified of the situation. At that time, a course of action shall be determined and further instructions shall be issued to Compass Group associates.

Additional Training

For additional training, refer to the applicable Compass Safety Minders and the Compass Corporate Safety website.

Final Thoughts

Identifying and correcting fire hazards, knowing when and how to use a fire extinguisher and learning the evacuation procedures for your facility will help you act appropriately in an emergency. Prepare yourself by thinking about the information we discussed today. There may come a time when you will be glad you did.

4.13 Personal Protective Equipment (PPE)

NOTE: The information contained in this section refers to the hazards associated with Vending, Dining, EVS, PT, and Valet parking. All other business lines refer to Addendum 9.

- Some of the items we used in our day to day operations (such as cut-resistant gloves, slip-resistant shoes, and oven mitts used by Dining operation) also fall into the category of PPE but, since it is covered elsewhere in this manual it is not covered here.
- It is the responsibility of the unit manager, and/or the district manager to determine exactly which PPE is required at each location. Refer to the SDS or equipment manufacturers operating instructions for requirements.
- REMEMBER: If a particular PPE item is *recommended* by the SDS or equipment manufacturers operating instructions we are *required* to have it available for use.

Meeting Leader: *Your presentation will be most effective if you do not read this word for word, but rather use it as an outline for your discussion. Use your personal knowledge and experience to further customize and support the information in the talk.*

NOTE: ALL personal protective equipment is to be provide to associate free of charge. The single exception to this rule, in all states except Puerto Rico, is footwear (i.e. slip-resistant and/or steel toed shoes) UNLESS it is job specific and not permitted to leave the facility.

Many people do not give personal protective equipment (PPE) a thought while performing their duties throughout the day. After all, safety glasses/goggles, gloves, aprons, etc. are for “industrial” chemicals and heavy equipment, and we don’t work with those, do we? No, but many of the cleaning supplies, lubricants and small power tools we do use are just as hazardous due to the complacent way many people handle them. This is why it is important to understand not only *which* PPE is required for a given task, but also *why* it is required. Below are some examples of the more common types of PPE that most units would need:

Eye Protection

Cover one of your eyes with your hand and you’ll get a small idea of what it would be like to be without it. To lose both eyes is much worse. Fortunately, safety goggles are very inexpensive insurance. There are many types available but the two types we are concerned with provide chemical and general-purpose impact protection:

- Chemical goggles protect the eyes from splashing or sprayed chemicals and, with few exceptions, should be available in every unit. Many of the cleaning and lubricating chemicals currently in use in our units are caustic and can cause severe eye damage and/or blindness.
- General-purpose goggles/face shields prevent eye injuries that result from small items, such as metal particles from grinding or drilling. These will be required in vending units with a maintenance department.
- Although prescription eyewear is designed with some impact resistance, eye glasses are not intended to provide the protection afforded by safety goggles and will not provide acceptable protection from chemicals. Contact lenses provide no protection and, although that seems like a common sense statement, there are people who do believe their contacts will protect their eyes.

Face Protection

Face protection devices will be made available to all associates, as needed.

- Face protection devices and use will be reviewed during orientation. Training will be repeated as often as necessary to comply with the requirements of all regulatory and accrediting agencies and when a new hazard is introduced.
- Individual face protection, in the form of masks and shields will be provided, as appropriate.

- Associates shall wear a safety face shield when pouring water into batteries and any other time deemed appropriate by management.
- Where applicable general use eye and face protection will be readily available for use in designated areas by employees, outside contractors and visitors.
- The protective equipment will be properly maintained. Clean and functional condition shall be required at all times.
- Healthcare associates shall wear masks when designated by Nursing through Isolation signs or whenever deemed appropriate by management.

Dust/Mist Masks

Use dust and mist masks as required for nuisance substances (e.g., dusts encountered during construction or cleaning activities, such as dusts from drywall, concrete, wood, fiberglass, or sweeping).

NOTE: Dust/mist masks are not for use with hazardous chemicals and are not to be used in circumstances where respirators are required.

Respirators

Respirators require specific training and fit testing that cannot be addressed in this section. DO NOT use a respirator if you have not been properly trained or do not understand the situations in which its use is required. For operations that do require respirators refer to Addendum 3 for guidance.

Chemical Resistant Gloves and Aprons

These are made of either natural or synthetic rubber to protect the body from acids and other injurious materials. Many of the chemicals used in our kitchens today will cause a “sunburn” type of injury; you may not even realize you have been burned until much later. A majority of the injuries will be, at the most, uncomfortable, although some can be severe enough to require medical treatment.

NOTE: Do not rely on thin, plastic aprons typically worn during food preparation. These will tear easily and may also have adverse reactions with some chemicals. Relying on your clothing to protect you from a caustic chemical is unsafe. Unprotected clothing offers little protection and the cloth may soak up the chemicals and keep it in contact with your skin thus prolonging exposure and injury.

Aprons and gloves should be worn along with goggles when using chemical cleaners such as Lime Away or oven cleaners.

Crothall EVS - Gloves and Glasses (G2)

Whenever gloves are required, safety glasses will be worn also. Latex or neoprene gloves and safety glasses shall be worn whenever handling chemicals or performing any cleaning-related tasks, including but not limited to:

- Handling trash or soiled linen
- High dusting
- Damp wiping
- Cleaning bathroom fixtures
- Wall washing
- Dust/wet mopping
- Window cleaning
- Floor scrubbing/stripping and recoating
- Changing mop water/solution
- Filling spray bottles and buckets
- Carpet shampooing

Steel or Reinforced Toe Shoes

These are intended to protect the toes from damage as a result of a heavy item being dropped on them. Everyone knows how much a stubbed toe hurts; try to imagine a 10lb can of peaches or even a vending machine falling on your foot. Some of our associates who would benefit from, and should be wearing

steel-toed shoes, are vending maintenance, warehouse, vending money-room associates and anyone whose primary duties are stocking storage rooms.

Using PPE

More important than having PPE is ensuring its availability and use. All PPE items must be available in sufficient quantities and not locked away in a cabinet. ALL associates should use PPE to protect themselves any time they are required to. If the unit does not have enough PPE to go around, purchase more. It is very affordable insurance.

PPE Inspection/Care

Proper inspection and care of PPE to ensure its serviceability is as important as ensuring it is available and used. ALL PPE items must be inspected and maintained in accordance with the manufactures instructions. There are too many varieties of PPE items in use across Compass Group, NA but the following are some examples that can be checked by most units:

- Slip-resistant shoes (where required) - Periodically check the soles of the shoes to ensure they are not worn out.
 - Safety goggles – Check for scratched lenses and stretched out elastic.
 - Gloves (all types) - check for holes, cuts, tears, missing finger tips and any other sign of damage.
- NOTE: Damp oven mitts offer little to no protection from heat so this is also a consideration.

It is important to note that when a PPE item shows signs of wear and/or damage it must be replaced immediately. Old, scratched goggles will eventually be in such bad shape that they could be more hazardous to use than to leave on a shelf.

Additional training

For additional training, refer to the applicable Compass Safety Minders and the Compass Corporate Safety website.

Final Thoughts

PPE is designed to protect you from health and safety hazards that can't be removed from the work environment. Every year an estimated 2 million people suffer a temporary or permanently disabling work-related injury. More than one-quarter of those injuries will involve the head, eyes, hands, or feet. Don't become a statistic. Think of how difficult it would be to learn to function with only one eye or less than ten fingers?

4.14 Preventing “Struck By” and “Striking Against” Accidents

Meeting Leader: *Your presentation will be most effective if you do not read this word for word, but rather use it as an outline for your discussion. Use your personal knowledge and experience to further customize and support the information in the talk.*

The “Struck By” and “Striking Against” accident categories are very common but frequently misunderstood. Even though the names imply they are different accidents, a review of the data indicates they are very similar and result in the same types of injuries. The majority of both claims can be prevented using the same tools: situational awareness and slowing down.

This discussion will describe these two accident categories, how they occur, common injury types, and tips for prevention.

What is the difference between a “Struck By” and “Striking Against” Accident?

Simply put, “struck by” accidents occur when someone is hit by a moving object such as a swinging door, cart, or an object that has fallen off of a shelf or rack.

Striking against accidents are just the opposite and occur when someone runs into an object such as a table, cart, or low hanging shelf.

Both accident categories result in many of the same types of injuries such as cuts, bruises, fractures, burns.

Preventing “Struck By” and “Striking Against” Accidents

Meeting Leader: *Review the following prevention tips and give specific examples where these might be used at your site.*

These types of accidents are actually quite simple to prevent and the best part is that many of them will have no costs associated with them other than the few minutes it may take to correct the problems.

Common prevention methods include the following:

- Slow down - Many of these accidents are simply the result of associates rushing to get a job done and moving too fast.
- Maintain situational awareness - All of us at one time or another has walked into a door frame, table or other object that we knew was there. Most of the time we suffer little more than the embarrassment of having “everyone” see us do it but occasionally injuries do actually occur. Usually the cause of this is while concentrating on a particular task we are simply not paying attention to our surroundings. Another cause is that many of the items in the facilities we work in can be easily moved making it possible to run into something that wasn’t here yesterday. The key is becoming familiar with your surroundings and maintaining situational awareness including the movements of others around you.
- Keep doors/drawers closed - Many times associates walk into an open door or something like an oven, cooler, or cabinet that was left open when they, or someone else, stepped away for a moment. Sometimes the associate that ran into the door is the same one that left it open. Filing cabinets are another common cause of this accident. A drawer is opened to retrieve a file, left open while unattended, and someone walks into it. The solution to these accidents is simple: Close the door/drawer unless you are standing in front of it.
- A very common type of “struck by” accident involves one associate opening a door into another associate that is standing near or passing by the doorway. This could be a cooler door or the door to an office, housekeeping closet, storage area or serving area. Sometimes these doors are equipped with windows that are intended to prevent this from happening. Some units have adopted a policy in which traffic through a particular set of doors is limited to “one-way”. In areas where the doors do not have windows or one-way traffic is not possible associates should simply

open the doors slowly. The simplest thing to do to avoid being struck by a door is to simply not stand in front of it.

- Control your carts - Some accidents are the result of a cart that one associate left in a walkway and another one walks into it. In some cases an inattentive associate pushes their cart into another associate. In a few cases the carts have been “shoved” to get it out of the way resulting in a run-away that is bound to hit someone or something. Keep walkways clear.
- Sometimes the layout of the facility is to blame. Many of the offices, kitchens, storerooms and warehouses we occupy just do not have enough room. This being the case, sometimes items protrude into the walkways. These can be pallets, can openers attached to a table, buffers, or something that is just not stored properly sticking out into the walkway.
- Use proper storage techniques - Occasionally an accident is reported in which an item actually fell from a shelf or rack striking an associate. Most of the time this has been the result of haphazard storage practices. A good rule of thumb here is - If it looks like it may fall it probably will.
- Bungee cord usage is prohibited in all operations.
- Use verbal warnings. - When coming through a door, rounding a corner, or simply walking through the kitchen, verbal warnings can alert fellow associates that you are present. Examples of simple verbal warnings are:
 - o “COMING THROUGH” – When going through a door.
 - o “BEHIND” –When walking behind another associate.
 - o “CORNER” – When rounding a blind corner.
 - o “HOT STUFF” – When carrying hot items such as soup or caustic cleaning chemicals around fellow associates.
 - o “OPENING” – When a door is being opened into a common or high traffic area.

4.15 Vehicle Safety

There are several reasons to operate a vehicle, regardless of ownership, while on company business properly and safely. Not only are the lives of other drivers, and pedestrians important, but our company property or the property of others could also be damaged in a vehicle accident as well. However the most significant asset to Compass Group is in your vehicle...you. Safe vehicle operation must be adhered to at all times. Some examples of these operations include:

- Always wear seat belts,
- The use of bungee cords is prohibited,
- Report all vehicle accidents immediately,
- Lock the vehicle when not operating it,
- Operating within proper hours of service requirements (where applicable), and
- Carrying your DOT medical card at all times if required.

Compliance

There are several regulations governing the operation of a Commercial Motor Vehicle (49 CFR) and several Compass Group policies (see Additional Training Section of this chapter). Compliance with these regulations and policies are integral to providing a safe working environment for our associates and a safe environment for the public. Non-compliance will result in progressive discipline, up to and including termination.

Documentation

Before operating a company-owned vehicle, proper training must be conducted/verified. For a Commercial Motor Vehicle Driver (Class A - C), these files must be kept in a Driver Qualification File (DQF) and all associated documentation must be updated as necessary by regulation. For these drivers, as well as all other drivers, a Vehicle Safety Pledge must be signed and filed in the drivers' personnel file or DQF.

Policies

Below is a list of specific Compass Group policies in regards to vehicle operation/safety. These can be found on MyCompass in the DOT and Fleet Safety website. They include:

- DOT Physical Examinations
- Employment outside of the Company, DOT Drivers
- Hours of Service Policy
- Motor Vehicle Records Checks
- Use of Wireless Devices in Company Motor Vehicles
- Vehicle Markings
- Annual Vehicle Inspections
- Citations and Inspections, and
- DOT Driver Qualification Files

Additional Training

For additional training, refer to the applicable Compass Safety Minders and the Compass Corporate Safety website. Further, DOT policies may be requested from the Corporate Safety Department for use with training.

SECTION 5 SAFE WORK PRACTICES

- 5.1 Office Safety
- 5.2 Bloodborne Pathogens
- 5.3 Body Mechanics
- 5.4 Golf Cart and Light Utility Vehicle (L.U.V.) Safety
- 5.5 Hand Truck Safety
- 5.6 Safety Minders
- 5.7 Job Safety Analysis (JSA)
- 5.8 First Aid Kits and Eyewash Stations

5.1 Office Safety

The modern office environment presents an array of potential hazards that can be avoided by taking simple precautions.

Although working in an office has always been considered relatively safe, office associates face occupational hazards that include eye strain, musculoskeletal disorders, headaches, discomfort, slips, trips and falls and manual handling injuries. Employers should ensure they are aware of the condition of the office environment, keyboard equipment, and that associates take appropriate rest breaks when using computer equipment. Below is a checklist that can be used to ensure all areas are covered.

Office Furniture and Equipment

Office furniture, equipment and electrical appliances are arranged to obtain maximum safety and use of installed utilities, such as overhead lighting, wall outlets, telephones and other services.

Desks, filing cabinets, etc. are arranged so that drawers do not open into aisles or walkways. Desk and file drawers are closed after use. Weight is distributed in file cabinets so that upper drawer contents do not create a top-heavy condition.

Cabinets, bookcases and shelves are secured to building surfaces to prevent them from falling over. Faulty desks, chairs and other office equipment must be repaired or immediately taken out of service.

Rolling chairs must be in good condition and have at least five wheels.

Adequate and sufficient lighting is provided in all working areas.

Aisles and Floors

Aisle clearance is adequate for two-way traffic and for unobstructed access to all parts of the office and building.

Office arrangement allows easy egress under emergency conditions.

Wastebaskets, briefcases or other objects are placed where they are not a tripping hazard. Floors are clear of pencils, bottles and other loose objects.

Tripping hazards from electrical cords, phone outlets or other protrusions on the floor are prevented by arrangement of furniture or other means. Floors are free of loose tiles and projections that create a tripping hazard. Carpeting is in good condition and not badly worn or torn.

Shredders

No loose fitting clothing (i.e., loose sleeves, ties, scarves, etc.).

Restrain long hair.

Electrical Equipment

Electric fans are protected with guards with openings not over one-half inch, which prevents fingers from getting inside the guard.

Cords and plugs are in good condition. Electrical cords are not run through openings in doors, walls, ceilings or under carpets.

Multi-outlet strips are not plugged into other multi-outlet strips or extension cords. Extension cords are not plugged into other extension cords.

Extension cords are not used in place of permanent wiring. If an extension cord is required for more than one shift it may be necessary to rearrange the office or to contact an electrician to have additional electrical outlets installed. Extension cords must not be placed over radiators, steam pipes, through doorways or under rugs.

Space heaters are UL-listed. Space heaters have automatic shut-offs that will actuate if the heater tips over. Space heaters are plugged directly into a wall receptacle. Space heaters are located at least 3 feet from combustible materials.

Electrical devices show no signs of overheating.

Housekeeping

Good housekeeping is maintained to minimize accidents.

Approved ladders are provided for reaching materials on shelves and are maintained in a safe, serviceable condition.

Paper and materials are stored properly.

Combustibles are not stored under tables, desks or shelves.

Cleaning fluids are used only in small quantities and are stored in closed containers that are kept in well-ventilated areas. If flammable, they are not used near a flame or an open heating element.

Emergency Preparedness

Familiarize staff with emergency signals and procedures, and emergency equipment usage in the building (i.e., fire extinguisher, fire alarm pull stations, etc.).

Emergency numbers are prominently posted.

Computer Usage

There are several things you need to keep in mind when you sit at your computer for most of the day:

- Back: Compression of the discs in the lower back is caused more by sitting than standing or walking. A certain amount of disc compression is normal, but poor posture causes significant damage to the nerves and discs in the spinal cord over a period of time. It is imperative that you sit with proper posture, maintaining the natural curves ("S") of your spine.
- Head: Your head should be in the neutral position with eyes looking straight ahead. Your shoulders and back are more likely to fall out of good posture if your head drops.
- Feet and Legs: To evenly distribute the weight of your legs, your feet should touch the floor. You can use a footrest (block of wood or three-ring binder) to achieve this position. There should be enough space for your legs to fit comfortably under your desk. Your legs should be greater than a 90-degree angle, with knees raised slightly above hip level for good circulation. If your legs are long, you may want to lower the chair to get the proper position. The back of the knees should not come into direct contact with the edge of the chair. It is important that the tops of your legs do not come in contact with the underside of the desk.
- Arms: Your arms should be close to your side with elbows bent at a 90-degree angle, parallel to the floor.
- Wrists: Wrists should always be in a neutral position as much as possible. Make sure the keyboard is tilted to achieve the ideal position – a position that does not require extreme bending of the wrist. You may want to use a wrist rest to keep palms at the same height as the keyboard and to keep wrists from coming in contact with the hard edges.
- Chair: Your greatest office asset is a good, adjustable chair. Experiment with it to get the height and position set for your body. Use a lumbar support or rolled-up towel to help maintain the spinal "S" curve during seated work.

- Monitor: Make sure the monitor is about 18"-24" away from you. The top of a 13-inch monitor should be at eye-level (slightly below for those who wear bifocals or trifocals). To compensate for an oversized monitor, keep the center of the viewable text at or just below eye-level. The monitor can be raised with a monitor stand to achieve the ideal height.
- Keyboard: The keyboard should be adjusted so wrists remain in a neutral position. Make sure your arms hang naturally at your side. The mouse pad needs to be located next to your keyboard so the arm does not have to repeatedly extend in order to use the mouse.
- Documents: To determine the best position (to the right or left of the monitor), experiment with the placement of documents. Make sure you keep the documents at the same height and distance as your line of sight to the monitor. This will eliminate the need to refocus thereby reducing head and neck movements and eye strain.
- Glare: Limit eye strain by eliminating reflection and glare on the monitor. The screen should be perpendicular to light sources, such as a window. If this is not possible, use a glare screen. Tilt the monitor and adjust the contrast for better viewing.

Additional Training

For additional training, refer to the applicable Compass Safety Minders and the Compass Corporate Safety website.

Final Thoughts

Remember to take frequent breaks to give your static posture a rest and use other muscle groups. Deliver messages, make copies, perform other tasks or just take a moment to stretch and reposition your body.

5.2 Bloodborne Pathogens

NOTE: This section concerns bloodborne pathogens (BBP) only and is applicable to ALL Compass Group, NAD operations. Healthcare EVS and CLS operations where the associates are “occupationally exposed” (OSHA defines occupational exposure as “reasonably anticipated skin, eye, mucous membrane, or parenteral contact with blood or other potentially infectious materials that may result from the performance of an employee’s duties”) must refer to the exposure control plan (ECP), Addendum 16, for more detailed information and Hepatitis B vaccine guidance.

ALSO NOTE: BBP and, where applicable, ECP training must be conducted and documented upon initial hire and at least annually thereafter.

What are Bloodborne Pathogens?

Bloodborne Pathogens are microorganisms such as viruses or bacteria that are carried in blood and can cause disease in people. There are many different bloodborne pathogens including malaria, syphilis, brucellosis, Hepatitis B (HBV), and the Human Immunodeficiency Virus (HIV).

Definition

“Universal Precautions” is the term used to describe a prevention strategy in which all blood and potentially infectious materials are treated as if they are infectious, regardless of the perceived status of the source individual.

In other words, whether or not you think the blood/body fluid is infected with a bloodborne pathogen, you should treat it as if it is. This approach is used in all situations where exposure to blood or other potentially infectious materials is possible. This also means that certain engineering and work practice controls shall always be utilized in situations where exposure may occur.

Emergency Procedures

In an emergency situation involving blood or other potentially infectious materials (OPIM), you should always follow universal precautions and try to minimize your exposure by wearing gloves, goggles, and other barrier devices.

If you are exposed, you should:

1. Wash the exposed area thoroughly with soap and running water. Use non-abrasive, antibacterial soap if possible. *If blood is splashed in the eye or mucous membrane, flush the affected area with running water for at least 15 minutes.*
2. Report the exposure to your supervisor as soon as possible.
3. Document the exposure. This will be kept in your personnel file so that you can document the workplace exposure to a hazardous substance.
4. You may also go to your nearest hospital or clinic to request blood testing or the Hepatitis B vaccination if you have not already received it.

PPE, Work Practices & Engineering Controls

It is important to use personal protective equipment and work practice controls to protect yourself from bloodborne pathogens.

Personal Protective Equipment

The first step to take in any situation where you may be exposed to a bloodborne pathogen is to ensure you are wearing the appropriate personal protective equipment (PPE). This is a simple precaution to take in order to prevent blood or potentially infectious body fluids from coming in contact with your skin.

NOTE: An approved bloodborne pathogen cleanup/disposal kit should be available in the unit. Follow the directions and use the PPE and other supplies provided.

Rules to follow

- Always wear personal protective equipment in exposure situations.
- Remove and replace PPE that is torn or punctured, or has lost its ability to function as a barrier to bloodborne pathogens.
- Remove PPE before leaving the work area.
- If you work in an area with routine exposure to blood or other potentially infectious materials, the necessary PPE should be readily accessible.

Gloves

Gloves should be made of vinyl, nitrile, rubber, or other water impervious materials. If glove material is thin or flimsy, double gloving can provide an additional layer of protection. Also, if you know you have cuts or sores on your hands, you should cover these with a bandage or similar protection as an additional precaution before donning your gloves. *Remember, you should always inspect your gloves for tears or punctures before putting them on. If a glove is damaged, don't use it!* When taking contaminated gloves off, do so carefully. Make sure you don't touch the outside of the gloves with any bare skin, and be sure to dispose of them in a proper container so that nobody else will come in contact with them, either.

Goggles

Anytime there is a risk of splashing or vaporization of contaminated fluids, goggles and/or other eye protection should be used to protect your eyes.

Face Shields

Face shields may be worn in addition to goggles to provide additional face protection. A face shield will protect against splashes to the nose and mouth.

Aprons

Aprons may be worn to protect your clothing and to keep blood or other contaminated fluids from soaking through to your skin.

Remember to follow all universal precautions and treat all blood or potentially infectious body fluids as if they are contaminated. Avoid contact with potentially contaminated objects whenever possible. Whenever contact with these objects or surfaces is unavoidable, wear personal protective equipment.

Hygiene Practices

Hand-washing is one of the most important (and simplest) practices used to prevent transmission of bloodborne pathogens. Hands or other exposed skin should be thoroughly washed as soon as possible following an exposure incident. Use soft, antibacterial soap, if possible. Avoid harsh, abrasive soaps, as these may open fragile scabs or other sores.

Hands should also be washed immediately (or as soon as feasible) after removal of gloves or other personal protective equipment. Because hand washing is so important, you should familiarize yourself with the location of the nearest hand-washing sink.

Decontamination and Sterilization

All surfaces, tools, equipment and other objects that come in contact with blood or other potentially infectious materials must be decontaminated and sterilized as soon as possible. Equipment and tools must be cleaned and decontaminated before servicing or being put back into use.

Decontamination can be accomplished by using Quaternary Disinfectant Cleaner. If you are decontaminating equipment or other objects upon which someone has been cut, use the following guide to determine how long the Quaternary Disinfectant Cleaner is to remain in-place before continuing the cleaning process:

- All other blood or other potentially infectious materials-1 minute, then clean.
- Norwalk Virus-leave on spill 10 minutes, then clean.

NOTE: Bloodborne pathogens kits usually contain a small bottle (2 to 4-ounces) of disinfectant, but this may not be a sufficient quantity and is not recommended for use on vomitus or feces. Use the proper Quaternary Disinfectant for clean-up. Refer to the manufacturer's Safety Data Sheet (SDS) for chemical hazards, first aid treatment, and PPE required for use.

Broken Glassware

Broken glassware that has been visibly contaminated with blood must be sterilized with an approved disinfectant solution before it is disturbed or cleaned up. Glassware that has been decontaminated may be disposed of in an appropriate container.

Broken glassware must not be picked up directly with the hands. Sweep or brush the material into a dustpan.

Uncontaminated broken glassware may be disposed of in a closable, puncture-resistant container such as a cardboard box or coffee can.

By using universal precautions and following these simple engineering and work practice controls, you can protect yourself and prevent transmission of bloodborne pathogens.

Healthcare Environments

For those units working in the healthcare environment (Morrison Healthcare Food Service, Morrison Senior Living, Community Works, etc.), there may be specific protocols you must follow in addition to the information listed above. For Community Works, refer to the Policy and Procedures Manual. For Morrison Healthcare, contact your Sector Safety Manager. All other Healthcare operations refer to the Exposure Control Plan in Addendum 16.

Rules to Follow

- Never touch an improperly disposed of sharp. If one is found, work shall stop and a supervisor must be notified. The supervisor will document the occurrence and notify the charge nurse, who shall make arrangements for the sharp to be properly disposed of.
- When handling waste, all associates will hold the bag away from the body, regardless if it contains municipal waste or regulated medical waste.
- If a sharps container is filled higher than the fill line (3/4 full), the supervisor will be notified and the supervisor will notify the charge nurse. If it is the responsibility of the Compass contract to remove the sharps container, this shall be done with extra care. If it is not the responsibility of the Compass contract, do not remove the container.

Needle Stick Prevention

A potentially serious incident, primarily in the Healthcare environment, is a needle stick. These incidents expose our associates to the potential dangers of hepatitis (HBV) and HIV. HBV is of greater danger since the virus remains infectious much longer than HIV.

Recordkeeping

OSHA requires that all work-related needle stick injuries and cuts from sharp objects that are contaminated with another person's blood or other potentially infectious material be recorded on the OSHA 300 Log as an injury regardless of infection or whether the associate seeks medical treatment. Please remember that only cuts, punctures, scrapes, etc. that are from contact with contaminated objects must be recorded under this standard. The OSHA 300 log must be recorded and maintained in such a manner so as to protect the confidentiality of the injured associate (e.g., removal of personal identifiers). Cuts resulting from non-contaminated materials are only recorded if the injury meets the normal recordkeeping criteria (see section 6.3 for details).

Healthcare units must also establish and maintain a sharps injury log for recording percutaneous injuries from contaminated sharps. The Sharps Log must contain, at a minimum, information about the injury, the type and brand of device involved in the injury (if known), the department or work area where the exposure occurred, and an explanation of how the incident occurred. The sharps injury log must be recorded and maintained in such a manner so as to protect the confidentiality of the injured associate (e.g., removal of personal identifiers).

Sharps Containers

Many accounts contract with an outside vendor to monitor and exchange sharps containers, however there are situations where Compass Group Support Services associates are expected to do so. In those scenarios, managers and associates must be trained to properly perform the task in a safe manner. Gloves must be worn while handling the sharps container. The full container must be capped and/or sealed before being transported and stored in a secure area designated for regulated medical waste.

Waste/Soiled Linen Handling (Healthcare)

When handling waste, all associates will hold the bag away from their body. If an improperly disposed sharp is in the bag, holding the bag away from the body will prevent the sharp from injuring the associate.

Additional Training

For additional training, refer to the applicable Compass Safety Minders and the Compass Corporate Safety website.

Final Thoughts

Compass policy is to not allow the use of bleach in our units. The only exemption is if the client dictates it be available or used for limited, specific disinfecting procedures such as during an outbreak of certain particular communicable diseases (such as Norovirus, MRSA or C-diff).

If bleach is used as described above, it is critical we obtain a Safety Data Sheet (SDS) for the bleach and train our associates on its safe use, making sure to focus on the use of PPE (chemical gloves, eye protection) and the importance of not allowing it to contact other products onsite which contain ammonia.

5.3 Body Mechanics

From time to time, each one of us makes the mistake to attempt to lift an item that is too heavy, or we bend the wrong way when lifting an item. All associates must use proper lifting techniques to avoid injury when lifting heavy or bulky objects. Associates should seek assistance when lifting objects that weigh 50 pounds or more. Use good judgment to determine if you need assistance, a dolly/hand truck, or other tool(s) to safely lift and move an object.

The back supports the weight of the entire upper body. When you lift objects or move heavy loads, your back must support even more weight. If you exceed your body's natural limits, your back cannot support both your body and the extra load. The excess, unsupported pressure is transferred to your lower back, where injury is imminent. By using the muscles in your arms and legs and exercising proper lifting techniques, you can move loads safely and protect your back from possible injury.

Follow these guidelines to help avoid back injuries:

- Avoid carrying or moving objects manually. Plan jobs and arrange work areas so that heavy items may be moved mechanically.
- Keep in good physical condition. If you are not used to lifting and vigorous exercise, do not attempt difficult lifting tasks.
- Think before you act. Use proper lifting and material handling techniques and mechanical aides such as dollies, handcarts, etc. Get help if you need it.
- If the object is too heavy or bulky, get help.
- Do not twist at the waist or bend sideways. Instead, turn the entire body beginning with your feet.
- Do not perform awkward lifts such as reaching over objects or lifting high above the head.
- Do not lift objects at arm's length.
- When moving objects, proceed with caution through doors and around corners, and be aware of other associates working in the area.
- When lifting heavy objects, follow these steps:
 1. Test the object's weight before handling it. If it seems too heavy or bulky, get assistance.
 2. Face the object; place one foot behind the object and one foot along its side.
 3. Bend at the knees, keeping your back straight.
 4. Get a firm, balanced grip on the object. Use the palms of your hands. Wear gloves, if necessary.
 5. Keep the object as close to your body as possible. "Hug" the load in close before lifting.
 6. Lift by straightening your legs and slightly un-bending your back.

Musculoskeletal Disorders (MSD's)

A musculoskeletal disorder is an injury/disorder involving muscles, ligaments, joints, cartilage, and/or the nervous system. The injury/disorder occurs over a period of time and is caused by several risk factors in the workplace, including repetitive motion, exertion and awkward posture. Compass Group will take the necessary steps to prevent or reduce the potential for MSD's and ensure that all associates are aware of the effects of MSD's caused by the exposure to risk factors. Engineering controls, administrative/work practice controls and the provision of personal protective equipment will be utilized to correct and minimize MSD's.

Reporting Procedure - Known or Suspected Injury

If MSD signs and symptoms are not reported early, permanent disability may result. It is important that you report MSD signs and symptoms right away to avoid long-lasting problems. MSD's and/or related signs, symptoms or hazards should be reported immediately to your supervisor.

As with any on-the-job injury, report MSD's at once, and complete a Compass Report of Injury Packet.

Hazard Prevention

Engineering Controls

Engineering controls are the preferred method of controlling ergonomic stresses. The following engineering controls must be considered when designing a workstation or recommending corrective measures:

- Workstations must be designed to accommodate the person who actually works at the given station and not for an average or typical associate.
- Workstations must be designed so that the station can be adjusted easily to accommodate the associate assigned to the station. Equipment used at the station must be designed for that purpose.
- The workstation must also be sized to allow for the full range of movements required to safely perform assigned tasks.
- Tasks performed by the associate in the performance of his/her responsibilities must be designed to prevent extreme postures, repetitive motion, excessive force and static work.
- Tools used in the performance of assigned tasks shall be designed to prevent or reduce chronic muscle contraction; awkward finger, hand and arm positions; repetitive forceful motions; vibration; and excessive gripping, pinching or pressing with the hand and fingers.

Administrative Controls

The following administrative controls, when implemented, will be beneficial in the reduction of exposure duration, frequency and severity of ergonomic stresses:

- Apply a control that reduces the number of repetitive motions by an associate.
- Apply a control that reduces the force or physical exertion applied to any part of the body; and rotate associates to different tasks. Note: when rotating an associate to a different task, that new task must use a different group of muscles, tendons and nerves and proper training must be provided.

Work Practice Controls

An effective program for ergonomic hazard prevention and control also includes procedures for safe and proper work practices that are understood and followed by managers, supervisors and associates. It should include the following:

- Proper work techniques.
- Associate training and conditioning.
- Information on proper housekeeping.

Personal Protective Equipment*

Personal protective equipment (PPE) such as gloves, padding, clothing or equipment shall be designed for the intended purpose. Every effort shall be made to resolve the problems using engineering and administrative controls prior to using PPE.

No personal protective equipment is to be purchased without first consulting your immediate supervisor.

**Braces, splints and back belts are not considered personal protective equipment. Such devices shall only be used only after the associate has received training in that equipment's limitations and correct use.*

Training

The Unit Manager shall facilitate the training of associates covered by this policy. The curriculum of the training program shall, at a minimum, cover the following:

- Awareness of common Musculoskeletal Disorders (MSD's) and their signs and symptoms.
- The importance of reporting MSD's and their signs and symptoms as soon as possible, and the consequences of failing to report them early.
- How to report MSD's and their signs and symptoms in the workplace.
- The risk factors, jobs, and work activities associated with MSD hazards.

Training Frequency

Training shall be provided upon employment and thereafter when a job or task changes, resulting in an exposure to new ergonomic risk factors, or when a new process is introduced which has ergonomic risk factors. It may also be necessary to retrain an associate as a result of injury.

Additional Training

For additional training, refer to the applicable Compass Safety Minders and the Compass Corporate Safety website.

Workplace Ergonomics

Musculoskeletal Disorder (MSD): Injury/disorder of muscles, ligaments, joints, cartilage, and or nervous system

What are jobs/tasks of concern?

- Lifting
- Unloading
- Stacking
- Typing
- Cutting
- Assembling
- Carrying
- Sorting
- Pushing
- Pulling

What body parts are affected?

- Arms
- Legs
- Back
- Hands
- Fingers
- Wrist
- Shoulders
- Neck

What Risk Factors increase your chances of developing a MSD?

Repetition: Repeating the same motions every few seconds, or using a device steadily for more than four hours per day.

Awkward Posture: Repeatedly raising or working with the hands above head, or working with back, neck wrists bent for more than two hours per day.

Vibration: Frequently using tools or equipment that typically has high vibration levels.

5.4 Golf Cart and Light Utility Vehicle (L.U.V.) Safety

Only trained and authorized associates may operate Golf Carts or Light Utility Vehicles (L.U.V.)

Training Responsibilities

The Unit Manager is responsible for ensuring that all associates in their operation who use or service golf carts and light utility vehicles attend the required training.

Associate Operators are responsible for operating their golf cart or light utility vehicle according to the instructions set forth in this plan.

Training Overview

The safe operation of a golf cart should be taken as seriously as the operation of registered motor vehicles. This includes strict compliance with local laws and ordinances that govern the use of golf carts. Operators of golf carts must be at least 18 years old, possess a valid driver's license. First time drivers must receive training from a qualified instructor and be accompanied by an experienced operator on a test drive before they operate the vehicle alone.

Golf cart safety training shall include, but not be limited to, the following information:

- The policies contained in this program.
- Responsibilities of those involved in the program.
- An introduction to the golf cart's controls and their function.
- Inspection procedure to follow prior to starting the golf cart.
- Proper conduct for driving the golf cart.
- Steps to take when leaving the golf cart unattended.

Golf Cart and LUV Safety Rules

When driving the vehicle:

- Operate the vehicle from the driver's seat only.
- Be sure the load is balanced and secure.
- The use of eye protection is mandatory if the equipment does not have an enclosed cab.
- Remain seated in moving vehicle and hold on to seat handles or handrails at all times to prevent falls.
- Keep arms, legs, feet and entire body inside vehicle to prevent getting them caught between the vehicle and ground or other objects.
- Drive slowly through turns when loaded, and drive slowly straight up and down slopes to prevent turning the vehicle over.
- Avoid stopping on hills when fully loaded since starting, rolling backward, or sudden stops can cause vehicle to overturn or flip over backwards.
- Reduce speed when driving in poor conditions such as wet grass or rough terrain to avoid losing control of the vehicle or turning the vehicle over.
- Do not use on public roads. This vehicle is not designed or intended for street use and is therefore not licensed or approved for use on public roads.
- Always check behind the vehicle before backing up.
- Vehicles should only be driven in specified areas.
- Horseplay will not be tolerated as it can cause a serious or fatal injury.
- Do not exceed the maximum safe occupancy (usually 2 or 4).
- Do not exceed maximum safe speeds, particularly in areas with high pedestrian traffic.
- Never drive under the influence of alcohol, drugs, or medications.
- Drive safely and follow the rules.
- Equipment must have a working signal alarm while backing up.

Before Starting

- Check for correct tire inflation.
- Inspect for fluid leaks.
- Be sure everything is properly secured and stored.

Leaving the Vehicle Unattended

- Engage the parking brake.
- Put the F-N-R or shift lever in the Neutral position.
- Turn the key to the "OFF" position, remove it and take it with you.

Refueling the Vehicle

If equipped with a gas/diesel engine:

- Do not smoke, avoid areas with open flames
- Shut off engine
- Check the fuel before starting to operate.
- Fill the fuel tank(s) as needed.
- Only use NFPA approved fuel cans.
- Ensure filler nozzle is in contact with the tank
- Wear the appropriate PPE

NOTE: Propane tanks that are used with the operation of Golf Carts or Light Utility Vehicles are designed with the components necessary for UL approval. Golf Carts or Light Utility Vehicles should not be operated with tanks that are not UL approved for machine use. Do not use tanks that are designed for gas grills as they can create dangerous operating conditions.

Additional Training

For additional training, refer to the applicable Compass Safety Minders and the Compass Corporate Safety website.

5.5 Hand Truck and Cart Safety

The use of hand trucks and Carts is commonplace. Many incidents can occur while using this equipment. Hand trucks and carts may be used daily and look simple, but don't forget how to use it safely.

The following are tips to avoid injury while using hand trucks:

- Inspect the equipment to ensure that wheels, handles, and structures are working properly.
- If equipped with pneumatic tires ensure that they are properly inflated.
- Pre-stack the load so that the tongue of the hand truck slips under it without tipping. Make two trips if the load is very heavy or too high.
- Keep the center of gravity low. Heavy objects go on the bottom.
- Before moving with the load, check to see that it will not slip, shift or fall. Be sure you can control the load and see over it.
- When pushing the hand truck or cart, use your leg muscles and keep your back straight. When stopping, position yourself so you can use leg muscles to get the load back down.
- When moving, the load should be balanced so the truck does the carrying, and you only push. Never walk backwards with a hand truck or cart.
- Remember that some items, such as gas cylinders, must be strapped to the truck.
- Always move at a safe speed. Don't try to rush...you could lose control.
- When moving catering transit carts on inclined or uneven surfaces use two people to ensure the cart remains steady.

EVS Operations

- No food/beverages or personal items should be present
- All bottles MUST be properly labeled
- Carts should not be left unattended
- Chemicals should not be left unsecured
- Push carts and equipment – don't pull them or push one and pull another.
- Food, beverages and personal belongings are prohibited from work carts, Environmental Services closets and soiled utility rooms. These items are considered to be clean and those areas are considered to be dirty and could contaminate the items.

Additional Training

For additional training, refer to the Compass Corporate Safety website.

5.6 Safety Minders

The Safety Minders program is a quick, way to convey a specific safety message in an on-the-job classroom atmosphere.

Be creative when using Safety Minders, Use props or training aids to assist in the presentation. Creativity in training keeps the associate's attention and further emphasizes the importance placed on safety.

Safety Minders should be implemented using the following guidelines:

- Pick a new Safety Minder every week.
- Choosing the Safety Minder for the week should be done by:
 - o Evaluating recent unit accidents;
 - o Reviewing company accident trends;
 - o Areas of interest shown by the Safety Committee;
 - o Etc.

After communicating the Safety Minder to the associates, post a copy of the Safety Minder on the bulletin board, in the break room and locations where associates clock-in.

Safety Minders should be presented using the following three specific and distinct methods:

1. Group presentation. During staff meetings, conduct a group class explaining the Safety Minder for the week.
2. On-the-Job follow-up. During the week, management staff should continually question associates what the Safety Minder for the week is, why it is important and what procedures were taught. This is the best way to reinforce training.
3. Individual Training. If an associate needs extra assistance in understanding the Safety Minder, one-on-one training must be given.

The following is an example of an innovative use for the Safety Minders at a food unit:

Every day during the morning line-up (10 at 10, etc.), a member of the Safety Committee presents one bullet point from the Safety Minder for the week. This is completed Monday – Thursday. On Friday, during the morning line-up, a manager asks a question from the Safety Minder for that week, and the first associate who answers correctly receives an immediate reward (candy bar, \$1, etc.). To qualify for the Friday quiz, associates must have worked safely all week and not been observed breaking any safety policy. Violating a safety policy during the week eliminates the associate from participating in the Friday quiz for that week.

The Safety Minders can be found on the Compass Corporate Safety website.

Documentation for all training is essential. For the group presentation, a single sheet training record may be used. Place training documentation in a file. Individual training records should be kept in the associate's training folder.

5.7 Job Safety Analysis (JSA)

A Job Safety Analysis (or JSA) is a safety management tool in which the risks or hazards of a specific job in the workplace are identified, and then measures to eliminate or control those hazards are determined and implemented. More specifically, a JSA is a process of systematically evaluating certain jobs, tasks, processes or procedures and eliminating or reducing the risks or hazards in order to protect our associates from injury or illness. The JSA process is documented and the JSA document is used in the workplace to help guide associates in safe job performance. The JSA document is also a living document that is adjusted as conditions warrant.

The JSA process begins with identification of the potential hazards or risks associated with a particular job. Once the hazards are understood, the consequences of those hazards are then identified, followed by control measures to eliminate or mitigate the hazards. A more detailed JSA can be performed by breaking the job into steps and identifying specific hazards and control measures for each job step, providing the associate with a documented set of safe job procedures.

The end result of a JSA is an easy to understand document that can be shared with associates as part of specific job training and at safety meetings. The JSA process can be used to help refine safe work procedures or standard operating procedures at an operation, and the JSA document can serve as a useful tool in training new associates.

Management and associates must realize that documentation will not make a job safe. Rather, everyone must understand the risks and hazards associated with each task know how to use the chosen controls in such a way as to eliminate or mitigate those risks. JSAs serve to document the decisions of this process.

The JSA can be found on the Compass Corporate Safety website or from your local Safety Manager.

5.8 First Aid Kits and Eyewash Stations

In the event of a bonafide emergency (e.g. loss of consciousness or life threatening injury/illness) each operation needs to have established procedures in place as to how to notify emergency personnel and arrange transport. Prior to developing any local procedures this must be discussed with the client to determine any requirements they may have (e.g. calling 911 directly or notifying on-site security personnel). Associates with potentially life threatening injuries should not be moved or transported by untrained personnel unless inaction could result in further injury. Under no circumstances should a person with potentially life threatening injuries be transported in a personal or company owned vehicle.

NOTE: OSHA Standard 1910.151 states “In the absence of an infirmary, clinic, or hospital in near proximity to the workplace which is used for the treatment of all injured employees, a person or persons shall be adequately trained to render first aid.” The designated associate(s) must have a valid certificate of first aid training from the American Red Cross, local community college, or other recognized source.

The intent of this section is to give the managers a guideline to follow in order to meet the minimum standards set by the American National Standards Institute (ANSI) pertaining to first aid supplies required in the workplace.

There are three sizes of first aid kits. A small kit should be maintained at all accounts with 10 associates or less, a medium kit for units that have 11-25 associates and a large kit for units that have 26-50 associates. Form 8.1 contains the checklist of required items.

Accounts with 51 or more associates at ONE location must purchase and maintain first aid kits that would meet the requirements stated above. For example: Account “A” has 62 associates in one large facility. One large kit and one medium kit would be required for this unit.

Accounts that have multiple locations must use the applicable kit based on each *locations* size. Each individual location will need to have its own first aid kit that falls within the guidelines. For example: account “B” has 200 associates. There are 5 separate operating locations, 4 of which have 45 associates and the fifth has 20. In this case, the 4 large locations must each have their own large first aid kit and the smaller unit will require a medium kit.

Check the contents checklists inside the first aid kit monthly in order to ensure that all of the necessary first aid supplies are readily available in case of an emergency.

Included on the checklists is a requirement to check the expiration date on certain items in the kit (i.e., antiseptic cream or spray), as well as checking to ensure that all items in the kits are sealed as required.

Eyewash Stations

To provide accessible eye wash and, where required, body flushing stations whenever there is a risk of eye or body exposure or injury. Eyewash and body flushing station locations and use will be reviewed during departmental orientation. Training will be repeated as often as necessary to comply with the requirements of all regulatory and accrediting agencies and when a new hazard is introduced.

All operations shall have at least one plumbed eyewash station that meets the minimum OSHA requirements. The minimum requirements include the capability to flow at least .4 gallons of clean water for 15 minutes and a lateral travel distance from the exposure point of no more than 100 feet OR 10 seconds whichever is shorter. Because the variables involved in determining the location and quantity of eyewash stations necessary for a particular operation assistance can be provided by your Corporate Safety Manager. It is also necessary that eyewash stations are clearly identified, have unrestricted access, are functionally tested and documented weekly using form 8.15 or an equivalent.



Areas of risk of exposure or injury will be identified and proper placement of stations verified with proper corrective action taken. That includes a prominently displayed safety instruction sign.

The stations will be properly maintained.

Stations shall be readily available for use by associates, outside contractors and visitors.

Eyewash Bottles

NOTE: Eyewash bottle stations are intended for supplemental use only and must be used in conjunction with, not as a replacement for, plumbed stations. Accessible "personal" eyewash bottles will be made available wherever there is a risk of eye or exposure or injury.

Eyewash bottle locations and use will be reviewed during orientation.

Training will be repeated as often as necessary to comply with the requirements of all regulatory and accrediting agencies and when a new hazard is introduced.

Areas of risk of exposure or injury will be identified and proper placement of bottles verified with proper corrective action taken. That includes a prominently displayed safety instruction sign.

The bottles will be properly maintained, paying close attention to expiration dates printed on the bottle and any visible tampering of the bottle cap/lid, and immediately replace as needed. Keep in mind that once the eyewash bottle has been opened (exposed to air) it cannot be reused.

5.9 Heat Illness Prevention

The information contained in this section is required by State Law in California and by Compass Group, NA policy in all other states. NOTE: As with all sections in the Compass Group, NA Safety Manual a copy of this section must be readily available for the associates review and upon request a copy provided to them.

Training Requirements

All current and, prior to assuming the position, newly promoted supervisors must be trained on the procedures for heat illness prevention, procedures. This training must include all of the elements listed in this section with particular emphasis on:

- The procedures the supervisor is to follow to implement the applicable procedures to prevent heat illness.
- The procedures the supervisor is to follow when an associate exhibits symptoms consistent with possible heat illness (contained in the table below), including emergency response procedures.

All associates must be trained on the following:

- The local environmental and personal risk factors for heat illness.
- Compass Group, NA procedures for complying with the requirements of this standard.
- The importance of frequent consumption of *small* quantities of water, up to 4 cups per hour, when the work environment is hot and associates are likely to be sweating more than usual in the performance of their duties.
- The different types and common signs and symptoms of heat illness (contained in the table below).
- The importance of immediately reporting to the supervisor, symptoms or signs of heat illness in themselves, or in co-workers.
- The importance of acclimatization.
- Compass Group, NA procedures for responding to symptoms of possible heat illness, including how emergency medical services will be provided should they become necessary (contained in the table below).
- Compass Group, NA procedures for contacting emergency medical services, and if necessary, for transporting associates to a point where they can be reached by an emergency medical service provider.
- Compass Group, NA procedures for ensuring that, in the event of an emergency, clear and precise directions to the work site can and will be provided as needed to emergency responders.

Heat Illness

Heat illness, if ignored or left untreated, can be potentially life threatening and affects associates working outdoors, or in extreme indoor climates, under a variety of conditions. Heat related illnesses include:

- Heat rash, also known as prickly heat, is skin irritation caused by sweat that does not evaporate from the skin. Heat rash is the most common problem in hot work environments
- Heat cramps are caused by the loss of body salts and fluid during sweating. Low salt levels in muscles cause painful cramps. Cramps may occur during work or hours later.
- Heat exhaustion is the body's response to loss of water and salt from heavy sweating.
- Heat stroke, the most serious form of heat-related illness, happens when the body becomes unable to regulate its core temperature. Sweating stops and the body can no longer rid itself of excess heat. **NOTE: Heat stroke is a medical emergency that may result in death! Call 911 immediately.**

Heat Illness Symptoms and First Aid

Illness	Symptoms	First Aid
Heat Rash	• Clusters of red bumps on skin • Often appears on neck, upper chest, folds of skin	• Try to work in a cooler, less humid environment when possible • Keep the affected area dry
Heat Cramps	• Muscle spasms • Pain • Usually in abdomen, arms, or legs	• Have associate rest in shady, cool area • Worker should drink water or other cool beverages • Wait a few hours before allowing associate to return to strenuous work • Have associate seek medical attention if cramps don't go away
Heat Exhaustion	• Cool, moist skin • Heavy sweating • Headache • Nausea or vomiting • Dizziness • Light headedness • Weakness • Thirst • Irritability • Fast heart beat	• Have associate sit or lie down in a cool, shady area • Give associate plenty of water or other cool beverages to drink • Cool associate with cold compresses/ice packs • Take to clinic or emergency room for medical evaluation or treatment if signs or symptoms worsen or do not improve within 60 minutes. • Do not return to work that day
Heat Stroke	• Confusion • Fainting • Seizures • Excessive sweating or red, hot, dry skin • Very high body temperature	Call 911 or local emergency number immediately While waiting for help: • Place associate in shady, cool area • Loosen clothing, remove outer clothing • Fan air on associate; cold packs in armpits • Wet associate with cool water; apply ice packs, cool compresses, or ice if available • Provide fluids (preferably water) as soon as possible Stay with associate until help arrives

REMEMBER: Only use this information as a guide to help associates in need. If there are any doubts seek medical attention.

Access to Water

The following requirements must be enforced at all affected locations:

- Potable drinking water must be readily available at no cost to the associate.
- Maintain, at all times, sufficient quantities of pure and cool potable drinking water (i.e. enough to provide at least one quart per associate per hour for the entire shift).
- Care must be taken to prevent contamination of the drinking water supplied to the associates.
- Locate the water containers as close as practicable given the working conditions and layout of the worksite.
- Keep it readily accessible and, if necessary, move it with the associates!
- Encourage the frequent drinking of water.

Remind associates not to wait until they are thirsty to take a drink!

Access to Shade

If the temperature does not exceed 80° Fahrenheit shade is not required unless associates request it and then it must be provided in a timely manner. When the temperature is expected to be 80° Fahrenheit or higher the following rules apply:

- Have and maintain one or more areas of shade at all times, when associates are present.
- Locate the shade as close as practical to the area where associates are working.
- Provide enough shade to accommodate the number of associates on recovery, rest periods, or normal paid or unpaid breaks/if they remain on site. Associates must be able to sit in a normal posture fully in the shade without having to be in physical contact with each other.
- Shaded area must not cause exposure to another health or safety hazard.
- Access to shade must be permitted/available at all times.

NOTE: In situations where the supervisor can demonstrate that it is not safe (e.g. high winds) or feasible to provide shade, alternative cooling measures that provide equivalent protection (e.g. periodic breaks inside a nearby building).

Monitor the Weather

On-site supervisors must keep track the weather of the job site by monitoring predicted temperature highs and periodically using a thermometer. Routine checking of a local weather site using a smart phone is highly recommended. Additionally local management must determine on how weather information will be used to modify work schedules which may increasing number of water and rest breaks or, in extreme cases stopping the outdoor work early. The management must ensure that the on-site supervisor is aware of these procedures and implements them in a timely manner.

High Heat Procedures

NOTE: By law this section is required to be implemented in Compass Group, NA landscaping operations. However the information contained below could be helpful for associates in other job types that may be exposed to extreme heat conditions.

When the temperature equals exceeds 95° Fahrenheit, or is expected to, the following additional preventive measures must be implemented:

- Ensure effective and regular communication (by voice, observation, electronic or other effective means).
- Observe associates for alertness and signs and symptoms of heat illness.
- Supervisory or designee observation of 20 or fewer associates
- Mandatory “buddy system”
- Designate one or more associates to call for emergency services
- Increased drink reminder frequency.
- Mandatory pre-shift meetings on prevention.

Emergency Response Procedures

In the event that an associate, or associates, are showing signs of heat illness or there is a bonafide emergency involving heat:

- Respond to signs and symptoms of possible heat illness.
- Associates exhibiting or reporting signs or symptoms of heat illness shall be monitored and not left alone. Onsite first aid or appropriate emergency medical services shall be offered.
- Supervisors must take immediate, appropriate action.
- Ensure effective communication.
- If serious heat illness is indicated, implement emergency response procedures (e.g. contact 911)
- Contact emergency medical services and ensure that clear and precise directions to the site can be provided

Acclimatization

For associates not used to working outdoors we must take action(s) to acclimatize them to the environment. This can be accomplished by:

- Lessening the intensity of the work and/or shortening the newly hired associates' shift length for at least the first two weeks.
- Modify the work schedule or reschedule non-essential duties, during the hotter summer months.
- Be extra-vigilant with associates to more readily recognize the symptoms of possible heat illness.

Additional Considerations

Supervisors must ensure that certain personal factors are taken into consideration before assigning a task where there is the possibility of a heat-related illness occurring. These factors include:

- Age
- Weight and fitness
- Personal health issues
- Drug or alcohol use
- Prior heat-related illness

Contact your Safety Manager for further guidance.

SECTION 6 AFTER AN INJURY

- 6.1 After an Injury Checklist
- 6.2 Accident Investigations
- 6.3 OSHA Recordkeeping
- 6.4 Emergency and Crisis Situations – Guidelines & Procedures

6.1 After an Injury

Follow the Report of Injury Packet

It is Compass Policy that all associates must immediately report all injuries, regardless of severity, to a member of management. After an injury has taken place and the associate has notified their supervisor, it is necessary that the unit manager or supervisor follow the steps provided in the Report of Injury Packet utilizing the Report of Injury Checklist and subsequent forms. However, before the checklist is begun the unit manager or supervisor shall:

- Ensure appropriate medical attention is provided. If a doctor visit is required, the associate should be sent on the day of the injury- even if the injury appears minor.
- Offer and/or provide transportation (e.g. via taxi) to the doctor, if necessary.
- Understand the injured associate has the final say as to whether to seek medical attention.

For any severe injury where immediate medical attention is necessary or is life, limb, or eyesight threatening the associate shall be immediately taken or transported to a medical facility first. However if the injury is minor and treatment has taken place within the unit or the associate does not wish to seek medical treatment, the manager will then begin the post injury procedures lined out in the Report of Injury Packet. This includes:

- Completing the First Report of Injury Form
- Immediately reporting the incident to Gallagher Bassett or, for ND, OH, PR, WA, and WY, the appropriate State Agency (see "Contact Numbers" at the end of this section), but no later than 24 hours after the incidents occurrence.
- For non-emergency situations where the associate has elected to seek treatment have the claim intake person connect the associate to a PC365 nurse.
- The associate completing the Choice of Medical Attention Form.
- Taking the associate and witness statements.
- Completing an Accident Investigation as soon as possible (refer to Section 6.2 on proper investigations).
- Coordinate corrective action with your Corporate Safety Manager to prevent recurring or serious incidents.
- Where required by contract, the client, or their representative, must be notified of all injuries as soon as possible but within the prescribed time frame.

If the associate does wish to seek medical attention or it is necessary they seek medical attention the Unit Manager or Supervisor shall proceed with the Report of Injury Packet process and include the Medical Treatment Forms:

- Authorization for Medical Treatment
- Prescription Authorization
- Workers Compensation Guidelines

These forms must be provided to the associate prior to seeking treatment.

Management must ensure when the associate returns from any medical attention, they provide the Medical Treatment Form from the treating physician and/or clinic. This form will outline whether the associate may return to work without restrictions, with restrictions, or is not allowed to return to work at all.

If the associate does not return with a Medical Treatment Form, the manager must follow up with the doctor or clinic on the completion of the Medical Treatment Form and any restrictions that apply.

If The Associate Is Treated and Released To Full Duty

If the associate is clear to return to work without restrictions, management will complete the accident investigation and contact their Corporate Safety Manager for follow-up.

You must also contact your Zone Human Resources Director/Manager to discuss appropriate action if necessary.

If The Associate Is Treated and Released With Restrictions

- Provide associate with a letter offering transitional duty work. This letter is called The Modified Duty Agreement and is located in the Report of Injury Packet. It must be filled out accordingly with the physical restrictions provided by the treating physician. Once the associate signs the letter, he/she may return to work.

NOTE: some states require bonafide job offer letters or state specific forms for restricted/modified duty. Verify with Gallagher Bassett or your Corporate Safety Manager if a state specific form is required

- Notify the Claim Adjuster/Return to Work Coordinator of accommodations and estimated duration.
- Monitor associate's compliance with restrictions and increase work as medical recovery allows.
- If the associate makes numerous doctor visits, they must bring back a Medical Treatment Form after each visit. A new Modified Duty Letter must be created if the restrictions change for better or worse. The manager must also notify Gallagher Bassett after each new doctor visit with the results of the visit.
- If the associate is on modified duty up to 12 weeks the unit manager must notify their Compass Safety Manager and their designated Return to Work Coordinator immediately on the next steps.
- If the associate refuses the restricted/modified duty offer contact the Gallagher Bassett claim adjuster your Corporate Safety Manager immediately.

If The Associate Is Not Able To Return To Work Immediately

- Review any "Red Flag" issues and communicate any concerns to the claim adjuster.
- Obtain Medical Treatment Form from associate's physician to determine probable length of disability.
- Determine if the associate is qualified for medical leave:
 - o If yes, complete the necessary paperwork and begin collecting the associate's weekly contribution for continuation of group health benefits.
 - o If no, notify the benefits department to send a COBRA notice (if the associate is enrolled in our group insurance plan).
- Follow up with claims adjuster/nurse case manager and Return to Work Coordinator for medical release for full or transitional duty and keep them informed of any information regarding the associate.
- When released with restrictions or full duty, follow the appropriate action steps beginning with the administration of the Modified Duty Agreement.
- Notify your designated Return to Work Coordinator of any change of work status.

If The Associate Will Miss More Than Three Days Of Work

In order to better control the out of work days for associates that are off work due to injury, the following steps should be taken for all Compass associates who have reported an injury that results in more than three out of work days and it is anticipated that this will be a complex claim:

- The Director/Manager is to contact their respective Regional Safety Champion immediately.
- When the third day of being off of work starts, the Director/Manager is responsible to contact Human Resources regarding Family Medical Leave Act (FMLA) status.
- If required the Regional Safety Champion should set up a conference call to discuss the claim (i.e. return to work options, red flag issues, etc.). The call should include:
 - o Gallagher Bassett Adjustor
 - o Immediate Supervisor of the associate
 - o DM, DGM, or RDO
 - o RVP
 - o Appropriate Compass Claims Coordinator
 - o Appropriate Compass Safety Manager.

Contact Numbers

Workers Compensation for all states except ND, OH, PR, WA, and WY and ALL general; Liability claims contact Gallagher-Bassett (866)678-1774 (available 24/7)



State of Washington - For questions about filing an associate First Report of Injury or for questions about Workers' Compensation coverage, etc., call the following office that is closest to your account/contract:

Sedgwick CMS

- Liberty Lake Office (866) 666-8818
- Olympia Office (866) 702-3219
- Seattle Office (800) 579-1260
- Main Fax: (509) 922-5833

Reports can be completed on-line using the eTeam First Report of Injury form by accessing this Sedgwick Web Site www.sewickcms.com

Be sure to follow all eTeam instructions.

Ohio

To report an associate First Report of Injury call 1-888-268-4369. If the office is closed your call will go into Guest Service and there is an option to leave a message on the FROI line and someone will call you back. So you can call in the injury 24/7.

Please note: The only claim that should be called into this number are the claims in which claimants seek medical treatment. If no medical treatment sought, this is an "incident only" and the incident report should be faxed to 1-614-766-6888 with INCIDENT REPORT written on the cover page. Also, regardless of whether you are reporting an incident or claim, you need to make sure to include your location's house code on the incident report.

North Dakota

For an associate First Report of Injury, call 1-800-777-5033.

Forms can be obtained on-line from the North Dakota Workforce Safety and Insurance by going to their web site at www.workforcesafety.com

Wyoming

For an associate First Report of Injury, call 1-307-777-7441.

Forms can be obtained on-line from the Wyoming Workers' Safety and Compensation Division by going to their web site at <http://doe.wyo.gov/aboutus/safetyandcompensation/Pages/default.aspx>

If you have any questions about the process you can call the Wyoming Workers' Safety and Compensation Division at 1-307-777-7441.

6.2 Accident Investigations

Why do we investigate accidents?

Simply put, to determine the circumstances surrounding an accident. An effective investigation will reveal the 'breakdown' in the process which led to the accident or injury. Most importantly, an investigation will provide recommendations to prevent recurrence of the same type of accident and minimize the likelihood of a similar incident in the future.

Some benefits of a proper accident investigation include:

- Improvement of methods and conditions.
- Identification of training deficiencies.
- Demonstration of management's concern for associate safety.
- Supervisors increase their management competencies.
- Determining the "root cause" of the accident.

An investigation of all accidents, whether an injury is involved or not, is extremely important to prevent recurrences in the future.

Why should supervisors investigate?

- Supervisors have direct control over their staff and the ability to follow-up on corrective actions for incidents and accidents.
- They have daily contact with the associates working at their worksites or in their departments.
- They know the area, equipment, work processes, and individual personalities of their associates.

Find facts, not fault

Laying blame or finger pointing is not the goal of completing an accident investigation. Personal opinions (particularly regarding an injury) must be put aside and the person investigating must be unbiased and impartial.

Investigate ALL accidents, including "near misses"

Every accident should be reviewed to determine if the occurrence is developing into a trend. A "Near Miss" injury is one where an incident occurred, but the associate(s) did not receive an injury. Near misses can be a sign of a larger issue, or worse, a precursor to a more severe accident or injury. If deficiencies are identified early on, the chance for serious injury is significantly reduced.

Compass Group Accident Investigation

In order to perform accident investigations correctly, a number of steps and forms have been provided and can be found in the Report of Injury Packet. This packet not only contains proper reporting instructions and materials, but also provides the investigating manager/supervisor the tools to carry out an effective accident investigation.

The accident investigation, however is more than just filling out the forms. It is a process which takes many aspects into account. Before the paperwork can be done, the investigating manager must secure the scene. To do this the investigating manager should prevent anyone from entering the accident space, take photos of the accident scene, if possible, including any personal protective equipment which was being used and may have failed, and lastly identify the condition of the workspace which will be beneficial for working towards a root cause later on.

After the accident scene and witnesses have been secured, photos taken (if possible), and the associate either attended to by first aid or taken to clinic, the investigation process can begin.

There are 5 main pieces to be used from the Report of Injury Packet for a proper accident investigation which are:

- The Report of Injury Checklist (which provides a step by step process to follow after an injury),

- The First Report of Injury Form (where the investigator will identify and describe the injury),
- The Associate and Witness Statements (which are used to confirm the description of the incident as well as the environmental conditions just before the injury occurred.),
- The Accident Investigation Form itself (which is where the root cause can be identified and preventative measure and action plans are made.

When filling out the First Report of Injury Form, describe in detail how the accident occurred. The most critical piece of this form is Part C, Accident Details. It is important that this information be as descriptive as possible. For example, do not simply say “*associate slipped and fell*” when a more accurate description of the accident could be “*associate was walking through the warehouse when she slipped and fell on a puddle of hydraulic fluid that had leaked from a forklift. As she fell, she attempted to stop her fall by grabbing a pallet of coke. She cut her hand on a loose nail in the pallet and bruised her knee. Approved slip-resistant shoes were not worn.*”

Associate and Witness Interviews

If there are any witnesses to the incident, they need to be separated from the rest of the population and each other in order to keep their information undiluted through contact with anyone else at the scene. Witness investigations should take place in accordance with the information below.

Use the following tips while interviewing the involved associate and any witnesses:

- Conduct the interview as soon as possible after the accident. This will help ensure that the accident is fresh in everyone's mind.
- Put the associate at ease. Remind him/her of the purpose of the interview: you want to prevent reoccurrence, not place blame. Be friendly, understanding, sympathetic and calm. Do not immediately question the associate, especially if he/she is emotionally upset or in physical pain.
- Keep it private. Keeping the interview private will do two things: it puts the associate at ease, and prevents their ideas from being influenced by others.
- Let the associate tell his/her story. Do not interrupt to ask a variety of questions, and DO NOT make judgments.
- Ask specific questions. Questions should be phrased such as: What happened? When did this happen? Where did it happen? Why did it happen? Who was involved? How was it done? Try to ask open-ended questions so that responses cannot be answered with a yes or no. Never use the word careless.
- Repeat the associates' story back to them. By repeating the story, it will be more understandable and the associate can correct any errors or deficiencies in the story.
- Ask for suggestions to prevent future accidents of this type. Together, brainstorm with the associate and determine suggestions for corrective actions.
- Close on a positive note. Always thank the associate for their time and let them know they are helping contribute to the safety of their workplace.

Compass Group Accident Investigation Form

As with the First Report of Injury, all the information provided must be as accurate as possible. Part C of this form specifically caters to discovering the root cause of the injury being discussed, therefore ALL boxes which relate to the injury must be checked. There are three columns provided:

- Unsafe Acts,
- Unsafe Conditions,
- System Deficiencies.

There is no limit to the number of boxes per column that can be identified, however they all must have some role to play in the cause of the incident.

The last section, Part D (Analysis and Corrective Action) may very well be the most important piece of the investigation. This section can, and often does, determine the success of the entire investigation and future prevention methods and actions.

The first box states, “What could have prevented this Injury? What procedures were not followed?”

The second box asks “Describe an action plan to be taken to prevent this injury from happening again. (Include date to be completed)”

Once again it is important to describe in detail what actions are being taken.

The following statements are a preventative and corrective action sample for the example given above.

- Box 1. Preventative Actions: *“This forklift was not supposed to be in use due to the hydraulic leak. It should have been marked as out of operation and parked in an area away from the work environment.”*
- Box 2. Corrective Actions: *“The keys have been locked in the unit managers’ desk until repairs can be made. The forklift has been relocated, and all associates have been reminded to clean up any spills and that approved slip-resistant shoes are required at all times.”*

Corrective Action Plan

A thorough accident investigation culminates in the implementation of corrective actions. For every direct, indirect, and root cause of an accident, corrective actions must be put into place to eliminate the hazard from recurring. After the corrective actions have been identified:

- Determine a timeline for the corrective action to be implemented.
- Assign a specific person to implement the corrective action.
- Review the corrective actions after a set time period has elapsed since the corrective action was implemented (i.e., 30 days).

OSHA Recordable Accidents

All recordable incidents must be documented on the OSHA 300 Log within six days of occurrence. The log must be kept on-file at the location for inspection by OSHA officials. A summary log (OSHA 300A) must be posted at the site each year from February 1st to April 30th. Failure to comply with these requirements may result in an OSHA citation and/or fine to Compass Group. Please note that as long as the Compass Report of Injury Packet is completely and accurately filled out that the OSHA for 301 is not necessary.

General Liability Investigations

A general liability claim is either a property loss to any other party's property, or a personal injury to any person other than a Compass associate.

Examples of GL claims include:

- A guest complains that they became sick from eating food in a Compass dining center. Note: immediately notify QA or the crisis hotline (during off hours) at 877-710-6291 for food related claims (such as food poisoning).
- A guest or visitor to the facility slips and falls on a wet floor that has just been mopped.

A good relationship between the Compass Manager and the client Facilities Risk Manager, Safety Director or Director of Security should be established. In the event of a potential liability issue, all individuals need to communicate the incident and share all knowledge. An adversarial relationship between these individuals and the Compass Manager will make resolution of any potential GL claim more difficult.

Upon receipt of a potential general liability claim, the client should notify the Compass Manager. If allowed, the Compass Manager should obtain a copy of the client's incident report from the facility.

The Compass Manager should conduct his/her own investigation into the circumstances, getting statements from all parties involved. Make copies of all duty lists, training records, etc., which may be pertinent in later litigation.

The Compass Manager must call the incident in to Gallagher Bassett at 866-678-1774 within twenty-four hours of notification.

The Compass Manager should keep in touch with the client for any further developments, and keep the Gallagher Bassett adjuster informed of any new information that is obtained regarding the claim.

All records relating to potential general liability claims should be filed and kept indefinitely.

Accident Investigation Distribution

The completed accident investigation or general liability forms should be copied for review and sent to the appropriate members of management according to requirements set by your District Manager.

6.3 OSHA Recordkeeping

Who is required?

ALL Compass Group NA operations, including those in Puerto Rico and regardless of size, are required to keep OSHA 300 logs.

What is required?

- Record an injury/illness if the occurrence involves:
- Medical treatment beyond first aid.
- Days away from work.
- Restricted work or transfer to another job –these are cases that result in a change to one or more of the associates' routine tasks. Please note that "restricted work" means that one or more of an associates NORMAL tasks must be affected.
- Death as the result of a work-related injury, deaths from natural causes, for example a heart attack or stroke NOT induced by a workplace accident, are not recordable.
- Loss of consciousness, regardless of length.
- Diagnosis of a significant injury/illness by a physician or other licensed health care professional.

REMEMBER, only record illnesses or injuries that affect associates on Compass Group NA payroll.

Temporary associates, guests, and service or delivery associates would be recorded on their respective company's logs.

What is "Beyond first aid"?

This is treatment provided by a licensed medical professional that exceeds the following:

- Using a non-prescription medication at nonprescription strength (e.g. 400mg, two tablets, of over-the-counter ibuprofen is not recordable, 800mg, four tablets, is).
- Administering tetanus immunizations (these are preventative measures)
- Cleaning, flushing or soaking wounds on the surface of the skin
- Applying bandages, gauze pads, butterfly bandages, derma bond, Steri-Strips, etc.
- Hot or cold therapy
- Non-rigid means of support, (elastic bandages, wraps, non-rigid back belts, etc.)
- Temporary immobilization devices while transporting an accident victim.
- Drilling of a fingernail or toenail to relieve pressure, or draining a blister
- Eye patches
- Removing foreign bodies from the eye using only irrigation or a cotton swab
- Removing foreign bodies from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means
- Using finger guards
- Using massages
- Drinking fluids for relief of heat stress

Special Recording Criteria

Certain types of incidents have different recordkeeping requirements and include:

- ALL work-related needle stick injuries and cuts from sharp objects that are contaminated with another person's blood or other potentially infectious material. You must enter the case on the OSHA 300 Log as an injury. If there is doubt as to whether or not the needle or sharp object is contaminated with any bodily fluids or materials, the stick must be recorded.
- Musculoskeletal Disorders (MSD's) such as carpal tunnel, tennis elbow and rotator cuff injuries are recorded in the same manner as all other injuries and illnesses. But, for recordkeeping purposes, the employer retains flexibility to determine whether an event or exposure in the work environment caused or contributed to the MSD. For example if an associate files a claim for a rotator cuff injury but you are concerned that the injury may actually be because they participate in a bowling league you would not have to record this injury.

ALL occupational exposures to TB must be recorded on the OSHA 300. To protect the associates' privacy it must be recorded as a "respiratory condition".

Work Related or Not?

Injuries or illnesses are considered to be work-related if:

- An event or exposure in the work environment either caused or contributed to the resulting condition, a good rule of thumb here is if they are on the clock it's likely recordable.
- An event or exposure in the work environment significantly aggravated a pre-existing injury or illness.

You are not required to record an injury or illness if the occurrence involves:

- Consumption of food and beverages
- Common colds and flu
- Blood donations
- Exercise programs, company sponsored or not
- Diagnosis of a Mental illnesses

Lost Workdays

For OSHA recordkeeping purposes the tracking of lost workdays is different from workers compensation:

- There is no "waiting period", begin the count on the day after injury/illness is reported.
- Focuses on 'days away' or 'days restricted or transferred' from work, and follows calendar days, including holidays, regardless of associate's work schedule. With a cap of 180 days
- The Count can continue into next calendar year.
- End the count on day associate is released for duty (modified or full).

Required Forms

OSHA 300 is the Log of Work-Related Injuries and Illnesses. Data is Tracked based on the calendar year NOT fiscal year. In the event of a safety inspection by an OSHA Compliance Officer or corporate safety manager you will be requested to produce a copy of the OSHA 300 log. NOTE: OSHA Compliance officers, and clients, will typically ask for the last three years logs, inform them that the operation was exempt prior to Jan 1, 2015 therefore logs prior to that date do not exist. Because this form will be requested it is highly recommended that on or around Jan 1 you should fill in the year, establishment name, and city and state blocks in the upper right hand corner of the 300 form.

OSHA 301 is the Individual Injury and Illness Incident Report. This must be filled out for every recordable injury or illness within 7 calendar days of the injury. NOTE: A properly, and completely, filled out First Report of Injury sent by Gallagher-Bassett after a claim is filed and the Compass Report of Injury Packets may be substituted for the 301. Print both and file a copy with the OSHA 300 log.

The last form to discuss is the 300A which is the Summary of Work-Related Injuries and Illnesses. This form summarizes information contained on Form 300 and MUST be posted, in a spot where it is visible to ALL associates but, not the general public from February 1st through April 30th of the year following the date on the log. Please note that the on-site manager/director for each location is authorized, and responsible, to sign the OSHA 300A as the "Company Executive".

Additional things to remember about the forms:

- Records MUST be kept on site for 5 years not including the current calendar year.
- They can be kept electronically but must be accessible by any member of management
- The OSHA forms will require legal sized paper if you wish to print them.

Associate Involvement

Just as with associates compensation associates must be involved with the recordkeeping process:

- Associates must know procedure for reporting injuries/illnesses to their supervisor(s).
- Company cannot discriminate against associates who report injuries/illnesses. This does NOT mean that associates cannot receive progressive counseling for actions or inactions that resulted in the injury.

- Associate representatives for example supervisors or union representatives can have access to parts of the 301 Form, or the properly filled out First report of Injury and Compass Report of Injury packets, that are relevant to workplace safety and health.
- Associates MUST, provide treatment documents to the management within 7 days of the injury. This is important as the documentation is used by management to determine if medical treatment provided went “beyond first aid”.

Associate Privacy

To protect the associates privacy their name, and any other personal information can, and should, be kept off of Form 300 for certain types of injuries/illnesses and we retain the right not to describe the nature of ‘sensitive’ injuries. For example, in a case involving exposure to an HIV positive coworker’s blood, the associates name and the description of the injury/illness would be left blank on the 300 log. Associate representatives may only view the portion of 301 Form, or report of injury forms, that does not contain personal information and associate(s) names should be removed from the 300 log before providing the data to outside agencies, including OSHA.

Filing Requirements

These forms must be kept on file and updated for 5 years. Do not send copies to OSHA, or your safety manager, unless you are specifically asked to do so as part of an annual survey and keep the records secure but allow access as described earlier.

Reporting Accidents to OSHA

Reporting accidents directly to OSHA is required by law under the following circumstances:

- All operations must report to OSHA within 8 hours any work-related fatality, this includes any that appear to be from natural causes (e.g. heart attack or stroke).
- Work-related amputations such as the loss of a fingertip, in-patient hospitalization of one or more associates, and the loss of an eye must be reported to OSHA within 24 hours of learning of the incident.
- IMPORTANT NOTE: We do not need to report an inpatient hospitalization if it was for diagnostic testing or observation only. A good rule of thumb here is if the associate remains the hospital for more than 24 hours you should contact OSHA.
- These events can be reported by calling the local OSHA Area Office, find the phone number through OSHA’s website www.osha.gov or by using the nationwide 800 number (1-800-321-6742). You may also feel free to contact your safety manager for assistance.
- Failure to report can result in monetary penalties being issued by OSHA

Need Assistance?

If you have any questions you can refer to the OSHA 300 Quick Reference Guide, available on MyCompass, or contact your Corporate Safety Manager.

6.4 Emergency and Crisis Situations – Guidelines & Procedures

Please note that this is a Compass Group, NA directive and is subject to change, therefore this information is included in this manual for reference only.

Why Plan Ahead?

The following will help you plan for a crisis by identifying a course of action. The key to effective crisis management is planning. You need to be prepared before the crisis occurs because no one can foresee if and when a crisis will happen. Crisis planning helps minimize surprise and indecision during the critical first few hours of a crisis. When the crisis strikes, it is too late to start planning.

Crisis Planning Helps You To:

- Protect associates.
- Deal effectively with a variety of crisis-related issues that may arise.
- Ensure accurate and timely release of information to all key audiences.
- Manage and control the message being sent.
- Minimize damage to the Account or company's reputation.

Crisis planning and clear thinking during a crisis will help minimize legal or other consequences related to a crisis.

Make Sure All Associates Know How To:

1. Call for emergency aid (fire, client's security, police, paramedics, etc.)
2. Call the Compass Crisis Management Hotline
3. Call their supervisor/manager

Be sure that all associates know how to respond to guest/client issues. If the guest/client thinks something is serious enough to bring to your attention, give it proper attention. Quite often guest/client issues become crisis or media issues because the guest/client felt the situation had not been handled to their satisfaction or that the associate or manager did not care.

Sample Crisis Situations:

- Potential outbreak of foodborne illness
- Potential outbreak of other communicable diseases (e.g. norovirus, H1N1 flu)
- Account closure due to a crisis situation
- Workplace accident involving serious injury or death
- Product tampering or contamination
- Explosion or fire in the account
- Natural disaster (fire, flood, tornado, hurricane)
- Associate strike
- Boycott or picketing
- Notification of health department or other regulatory agency enforcement action, e.g. hearing, fine, suspension of operation or closure/threat of closure
- Crime incidents either to the account, associate or guest/client (robbery, rape, kidnapping, etc.)
- IT Alerts – such as computer hacking attempt, lost or stolen computers, electronic information that may have been compromised (e.g. Point of Sale Device)
- Utilities interruption or concern, i.e. sewage back-up, contaminated water supply, power outage, Boil Water Order
- Notification of an Occupational Safety and Health Administration (OSHA) inspection.
- Catastrophic vehicle accident involving any of the following:
 - Major disruption of utilities
 - Loss or spill of hazardous materials
 - Loss of human life
 - Severe injury
 - Accidents with passenger-carrying vehicles resulting in multiple injuries

- Accidents occurring at a railroad grade crossing that involve a Crothall/CROTHALL HEALTH CARE Service Solutions vehicle and a train

Step by Step Procedures

Should a crisis situation occur at your account/facility:

1. STAY CALM – call for emergency aid if needed. It is important that you think clearly and gather as many facts about the situation as quickly as possible.
2. PRODUCT CONTAMINATION – If product contamination is involved, identify, clearly label and isolate the suspect product. Contact Foodbuy buySmart immediately at 1-877-499-3663. If you hear about a problem from a guest, be sure to get the guest's name, address, phone, symptoms (if any), and any other information specific to the case. Product issues are very serious because they could have company-wide consequences.
3. If an associate, guest or client is injured in any way contact Gallagher Bassett immediately at 1-866-678-1774.
4. Immediately contact your Manager, Regional Manager, the Senior Regional Manager and the National Risk Manager to alert him/her of the situation. If you are unable to reach your manager, call the Compass Group Crisis Management Hotline at 1-877-710-6291.
5. Inform all associates of the situation – Let them know what they should do regarding inquiries from the media and/or guests or clients. Be sure to leave the telephone numbers and contact information for all associates so they can always reach you. Stress confidentiality of crisis situations to all associates.
6. Be prepared for possible media inquiries – Should you receive and media calls regarding a crisis situation, refer all media calls to the Compass Group Communications Department at 1-800-357-0012, x328-4018. It is important to centralize and control the flow of information on addressing a crisis or potential crisis by funneling all media inquiries through the Communications Department. Should you find yourself in a situation where you must speak to the media, please review the section "Tips for Speaking to the Media".

Tips for Speaking to the Media

There may be situations when the media shows up at your account/facility unexpectedly to get a comment about a crisis situation that might have occurred. You must be prepared. In a crisis situation anything you say can impact the image of our company and can have legal and other implications as well.

Speaking to the media – A few tips:

- Always behave courteously with reporters.
- NEVER use the phrase "NO COMMENT". If you cannot comment on a situation, say so – but also say why.
- Never ask the reporter if you can speak "off the record". There is no such thing. If you don't want to see it in print, don't say it.
- Never get argumentative or hostile toward reporters – it will only make the situation worse.
- Keep your message simple. Make your statements brief and concise.

If you are unaware of a situation or don't have enough information, you can say "Please provide me all the information you have and I will have to check out this information. May I have your name and phone number so someone from our communications department can get in touch with you? What is your deadline?"

Make sure you call the Compass Communications Department. It is important to let them know who the reporter is and what the reporter is calling about so they can anticipate the call.

EMERGENCY NUMBERS

1. Call for emergency aid if needed
2. Call your supervisor and manager
3. Call the Compass Group Management Hotline at 1-877-710-6291

FIRE DEPARTMENT: _____

CLIENT SECURITY: _____

POLICE DEPARTMENT: _____

PARAMEDICS: _____

ACCOUNT/CONTRACT MANAGER: _____

REGIONAL MANAGER: _____

SENIOR REGIONAL MANAGER: _____

CORPORATE SAFETY MANAGER: _____

SECTION 7 CONTACT INFORMATION

7.1 Key Contacts

7.1 Key Contacts

Need For Contact	Who To Contact	Where To Contact
To report a work-related injury:	Gallagher Bassett	<i>Telephone:</i> 1-866-678-1774
For issues or questions that cannot be resolved after contacting the appropriate personnel listed below.	Ron Ehrhardt, VP of Operational Safety Parsippany, NJ	<i>Telephone:</i> (973) 434-3057 <i>Fax:</i> (704) 295-5896 <i>E-Mail:</i> ron.ehrhardt@compass-usa.com
OSHA/DOT/EPA and Workplace Safety Concerns for Laundries and Facilities (CE/HTS/POM)	Brett Church, Director of Environmental, Health and Safety Charlotte, NC	<i>Telephone:</i> (704) 328-7377 <i>Fax:</i> (980) 235-6177 <i>E-Mail:</i> brett.church@compass-usa.com
Workplace Safety Concerns for Crothall Healthcare (EVS/PT), SSC, and Morrison Healthcare	Brian Varner VP of Risk Management Compass One Healthcare Denver, CO	<i>Telephone:</i> (303) 319-8106 <i>Fax:</i> <i>E-Mail:</i> bvarner@compass-usa.com
DOT/FMCSA Transportation and Driver Safety & Compliance Programs, Fleet Regulatory Guidance for Corporate and All Transportation Sectors	Lennie Glass Sr. Corporate Safety Manager Cleveland, OH	<i>Telephone:</i> (216) 551-1925 <i>E-Mail:</i> lennie.glass@compass-usa.com
DOT and Workplace Safety Concerns for Bon Appetit.	George "Skip" Ray, Corporate Safety Manager Pryor, OK	<i>Telephone:</i> (918) 530-0276 <i>E-Mail:</i> george.ray@compass-usa.com
Workplace Safety Concerns for Restaurant Associates and Culinary	Kristy Lager Corporate Safety Manager Oswego, IL	<i>Telephone:</i> (630) 864.7955 <i>Fax:</i> (704)295-5031 <i>E-Mail:</i> kristy.lager@compass-usa.com
Workplace Safety Concerns for Morrison Senior Living, Morrison Community Works and Bateman	Kenneth Mayer, Corporate Safety Manager Willoughby, OH	<i>Telephone:</i> (440) 942-2628 <i>Fax:</i> (440) 942-2628 <i>E-Mail:</i> kenneth.mayer@compass-usa.com
Workplace Safety Concerns for Chartwells Higher Education	Fred Berren Corporate Safety Manager Sanford, ME	<i>Telephone:</i> (207) 653-9951 <i>Fax:</i> (207) 324-0044 <i>E-Mail:</i> fred.berren@compass-usa.com
Workplace Safety for Chartwells K-12	Jeanna Collins Corporate Safety Manager Houston, TX	<i>Telephone:</i> (281) 435-6516 <i>E-Mail:</i> Jeanna.collins@compass-usa.com
Workplace Safety Concerns for Flik International and Wolfgang Puck Catering	Jim Robinson Corporate Safety Manager Lakeland, FL	<i>Telephone:</i> (863) 210-5727 <i>E-mail:</i> jim.robinson@compass-usa.com
Workplace Safety for Eurest	Ruben Monroe Corporate Safety Manager Houston, TX	<i>Telephone:</i> (832) 423-4662 <i>E-mail:</i> ruben.monroe@compass-usa.com
Workplace Safety Concerns for Canteen	Carl Foden Corporate Safety Manager Santa Ana, CA	<i>Telephone:</i> (909) 248-1321 <i>E-mail:</i> carl.foden@compass-usa.com

Need For Contact	Who To Contact	Where To Contact
Workplace Safety Concerns for Morrison Healthcare	Dan Wood Corporate Safety Manager Johnstown, PA	Telephone: (814) 254-4036 Fax: (814) 254-4239 E-mail: daniel.wood@compass-usa.com
Workplace Safety Concerns for Morrison Healthcare	Amanda King Corporate Safety Manager St Augustine, FL	Telephone: (281) 636-9728 E-Mail: amanda.king@compass-usa.com
Workplace Safety Concerns for Touchpoint	Tanya Cernok Corporate Safety Manager Allentown, PA	Telephone: (610) 349-0670 E-Mail: tanya.cernok@compass-usa.com
Workplace Safety Concerns for Eurest Services	Katie Segura Corporate Safety Manager Crosby, TX	Telephone: (832) 418-4620 E-Mail: katie.segura@compass-usa.com
Workplace Safety Concerns Laundries, Facilities, and Healthcare Technology Solutions (HTS)	Ulysses Adams Corporate Safety Manager Baton Rouge, LA	Telephone: (225) 892-2961 E-Mail: ulysses.adams@compass-usa.com
Workplace Safety Concerns Laundries, Facilities, and Healthcare Technology Solutions (HTS)	Jason Colson Corporate Safety Manager Memphis, TN	Telephone: (704) 668-6696 E-Mail: jason.colson@crothall.com
Workplace Safety Concerns for SSC at Texas A&M	John Alaniz Corporate Safety Manager College Station, TX	Telephone: (979) 575-3879 E-Mail: john.alaniz@compass-usa.com
Workplace Safety Concerns for SSC	Kurt Jenkins Corporate Safety Manager Frisco, TX	Telephone: (214) 551-8428 E-Mail: kurt.jenkins@compass-usa.com
Workplace Safety Concerns for Crothall EVS/PT	Scott Cockreham Corporate Safety Manager Castle Rock, CO	Telephone: (303) 910-2689 Fax: (888) 896-1294 E-Mail: scott.cockreham@compass-usa.com
Workplace Safety Concerns for Crothall EVS/PT	Jay Springer Corporate Safety Manager Deptford, NJ	Telephone: (215)266-0656 E-Mail: jay.springer@compass-usa.com
Workplace Safety Concerns for Crothall EVS/PT	Terry White Corporate Safety Manager Rio Rico, AZ	Telephone: (330) 620-3408 Fax: (330)-836-0014 E-Mail: terry.white@compass-usa.com
Gallagher Bassett/Claims oversight for Zones in Zones 1 and 2	Eric Bailey, Senior Director WC Claims Charlotte, NC	Telephone: (704) 328-1256 E-Mail: eric.bailey@compass-usa.com
Gallagher Bassett/Claims oversight for Zones in Zone 3	Pertrina Amos Claims Manager Charlotte, NC	Telephone: (704) 649-9268 E-Mail: pertrina.amos@compass-usa.com
Gallagher Bassett/Claims oversight for Zones in Zone 5	Judy Helms Claims Director St Louis, MO	Telephone: (314) 373-9519 E-Mail: judy.helms@compass-usa.com

	Who To Contact	Where To Contact
Gallagher Bassett/Claims oversight for Zones in Zones 4 and 6	LaTara Lewis Claims Manager Chicago, IL	<i>Telephone:</i> (224) 238-8449 <i>E-Mail:</i> latara.lewis@compass-usa.com
Questions regarding insurance coverage, certificates of insurance, insurance contracts/agreements, experience mod ratings and risk management in general.	Karen Mouton Director of Insurance Charlotte, NC Patricia Poidomani Insurance Manager	<i>Telephone:</i> (704) 328-7296 <i>E-Mail:</i> karen.mouton@compass-usa.com <i>Telephone:</i> (704) 328-5750 <i>E-Mail:</i> patricia.poidomani@compass-usa.com
Questions regarding safety penalty disputes	John Parry Finance Director, Risk Management	<i>Telephone:</i> (704) 328-5265 <i>E-Mail:</i> john.parry@Compass-usa.com
Questions regarding Origami, general report query requests, incentive report related requests.	Lucy Lee Insurance Account Manager Charlotte, NC Scott Echerd Director Strategic Initiatives	<i>Telephone:</i> (704) 328-6331 <i>E-Mail:</i> lucy.lee@compass-usa.com <i>Telephone:</i> (704) 328-5229 <i>E-Mail:</i> scott.echerd@compass-usa.com

SECTION 8 FORMS

These forms are available for use as necessary in your operation. Should you need additional forms, please contact your Corporate Safety Manager.

Forms contained in Addendum Excel Workbook

- 8.1 First Aid Kit Checklists
- 8.2 Daily Hazard Identification Checklist – Vehicle
- 8.3 Notice of Unsafe Work Condition
- 8.4 Compass Accident Investigation Forms (replaced by the "Report of Injury Packet")
- 8.5 Safety Bulletin Board Checklist
- 8.6 Safety Committee Meeting Minutes Sample Format
- 8.7 Compass Group Vehicle Safety Pledge
- 8.8 Compass Group Managers Safety Pledge
- 8.9 Safety Training Record (Group)
- 8.10 Acknowledgement of Individual Safety Training
- 8.11 Opening Checklist (New Dining Units)
- 8.12 Compass Group Safety Contact Information
- 8.13 Compass Group Associate Safety Pledge (English)
- 8.14 Compass Group Associate Safety Pledge (Spanish)
- 8.15 Eyewash Weekly Inspection Form

SECTION 9 ADDENDUMS

This section is reserved for any Compass Safety Addendums that may be applicable to your operation. These addendum provide additional information and requirements not contained in the main Compass Group, NA Safety Manual. Some addendums apply to specific lines of business (e.g., Patient Transport, Valet Parking, and Landscaping) while others provide additional or more stringent requirements for other business lines (e.g., Laundry, POM, HTS, etc.). If you are unsure if a particular addendum is applicable to your facility or business line please contact your Corporate Safety Manager.

Download all applicable addendums, available on MyCompass, and post them in this section. If you are unsure which addendums may be applicable contact your safety manager, or any member of the safety team, for assistance.

NOTE: Certain addendums such as Confined Space and Lockout/Tagout will require editing and/or additional information to ensure they are 100% applicable to the specific operation. These sections are bolded below. Again please contact your safety manager for assistance.

- Addendum 1 Patient Transport
- Addendum 2 Valet Parking
- Addendum 3 Respirator
- Addendum 4 Lockout/Tagout (LOTO)**
- Addendum 5 Asbestos
- Addendum 6 Electrical
- Addendum 7 Ground Fault Circuit Interrupter (GFCI and Construction Electrical Safety)
- Addendum 8 High Voltage Electrical
- Addendum 9 Personal Protective Equipment (PPE)
- Addendum 10 Compressed Gas
- Addendum 11 Confined Space**
- Addendum 12 Pressure Vessels
- Addendum 13 Cutting and Welding
- Addendum 14 Decontamination of Tools
- Addendum 15 Emergency Action Plan**
- Addendum 16 Exposure Control Plan**
- Addendum 17 Fire Prevention
- Addendum 18 Loading Docks
- Addendum 19 Lifts
- Addendum 20 Landscaping
- Addendum 21 Radiation and MRI
- Addendum 22 Hot Work
- Addendum 23 Ammonia Awareness
- Addendum 24 – Hazardous Substance Handling (Crothall Laundries ONLY)
- Addendum 25 – Pharmaceutical Waste (Crothall Laundries ONLY)
- Addendum 26 – NFPA 70E Electrical