



SECTION 1

CHAPTER 1

CODE OF SAFE WORK PRACTICES

Purpose

Employee safety is the primary consideration for business operations. The Company believes that accidents can be prevented and holds management and all employees responsible for:

- preventing accidents
- ensuring the safety of others
- completing required regulatory compliance training

Scope

The Company safety policy applies to all employees and contractors working for Gravity Oilfield Services.

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Mission Statement



Using the Safety Manual

Purpose

This safety manual was developed to:

- prevent employee job-related injuries and illnesses
- protect Company property from damage and loss
- ensure that Company operations are not detrimental to the safety and health of the general public

Using this manual

Please read this entire manual thoroughly and carefully.
Know and follow the guidelines presented in this manual.

IF you have any questions about the safety procedures in this manual,
THEN contact your HSE Representative.

Manual contents

This manual:

- outlines the Company's Safety and Health Programs
- is designed to be a reference and guideline to the Company's Safety and Health Programs
- summarizes the minimum required safety rules and working procedures
- describes techniques to minimize occupational injuries and illnesses
- reflects applicable laws and regulations
- clarifies the minimum practices required of all employees
- provides knowledge to control physical and environmental conditions
- is not intended to be the complete and only authority with respect to safe operations

Obtaining additional information

Additional information can be found by consulting OSHA, DOT, EPA or other US Government web sites or booklets.



Company Safety Policy

Purpose This document outlines the basic principles of the Company Safety Policy.

Policy The Company will:

- comply with all applicable federal, state, and local health, safety and environmental laws and regulations in the areas of which we operate.
- conduct all operations in a manner that promotes the safety and well-being of all employees
- be responsible to perform our work without endangering people or causing damage to property and the environment
- implement the programs, training, and internal procedures necessary to achieve these goals

Objectives The Company Safety Program was developed to protect employees from injuries or illnesses that may result from incidents in the workplace. The Company will promote the belief that all accidents are preventable.

The following table lists the objectives of the safety manual to the chapters that fulfill that objective.

Objective	Chapter
Clearly define the safety responsibilities of managers, supervisors, and employees.	<ul style="list-style-type: none"> • <i>Understanding and Following the Safety Policy</i> • <i>Following the HSE Handbook</i> • Specific responsibilities for individual safety initiatives are discussed in the relevant chapters.
Establish safety rules and standards to help employees comply with local, state, and federal safety regulations.	Guidelines related to specific safety initiatives are discussed in <i>Performing Operations Safely</i> .
Implement medical and industrial hygiene programs.	<ul style="list-style-type: none"> • <i>Guidelines for First Aid and Medical Assistance</i> • <i>Protecting against Occupational Disease and Illness</i> • Programs related to specific safety initiatives are discussed in the relevant chapters.
Provide an emergency response plan that details emergency procedures.	<i>Developing an Emergency Response</i>



<i>Plan</i>	
Objective	Chapter
Create a standard inspection program to evaluate, document, and implement controls designed to prevent hazardous conditions.	<ul style="list-style-type: none"> • <i>Monitoring Conditions and Operations</i> • <i>Environmental and Safety Audit Programs</i> • Inspection requirements for specific safety initiatives are discussed in each chapter.
Promote clear communication among managers, supervisors, and employees on health and safety issues.	<ul style="list-style-type: none"> • <i>Code of Safe Work Practices</i>
Establish required safety instruction and standard training materials.	<ul style="list-style-type: none"> • <i>Code of Safe Work Practices</i> • Training on specific topics is discussed in conjunction with each individual safety program.
Standardize accident investigation, reporting, and root cause analysis.	<ul style="list-style-type: none"> • <i>Investigating Incidents</i> • <i>Reporting Incidents</i> • <i>Developing Corrective Action</i>
Implement employee recognition programs to reward employees for safety performance.	<ul style="list-style-type: none"> • <i>Code of Safe Work Practices</i>

Measuring success

The Company has created a comprehensive incident information system to monitor the success of its efforts to provide a safe and healthful environment for its employees.

See the chapter on *Safety/Environmental Audit Program* in this manual for more information.



Responsibilities of the Safety Department

Purpose This document outlines the responsibilities of the safety department, pertaining to safety issues.

Responsibilities of the Safety Department The safety department recommends and advises the company's management on administering the safety program.

Department responsibilities include:

- maintaining safety and health guidelines to assist employees in achieving the company's safety and health goals
- assist in accident investigations, if necessary
- assist management, when asked, with any equipment purchases required to comply with these safety regulations
- developing and maintaining open lines of communication with operations and local management
- ensuring compliance with company policy and federal, state, and local laws and regulations

These department responsibilities are discussed below. The responsibilities of specific department personnel are discussed in "Management Responsibilities".

Maintaining safety and health guidelines The safety department will analyze company policies, procedures, and operations to help identify and correct deficiencies that may result in accidents. The safety department will also publish corporate guidelines and policies when necessary.

For more information on these responsibilities, see the chapters on *Developing Corrective Action* and *Protecting against Occupational Illness and Injury* in this manual.

Incident/Accident investigations The safety department will ensure that managers and supervisors will conduct and document Incident/Accident investigations within 48 hours of the incident/accident.

See *Investigating Incidents* in this manual for more information.



Equipment purchase and new construction

The safety department will:

- evaluate, recommend, purchase, or coordinate repair of safety equipment
- assist Yard Managers and Supervisors with construction recommendations for safety equipment or environmental controls

Open communication

The safety department will develop and maintain open lines of communication with yard management and HSE coordinators through regular meetings and periodic reports on the success of the safety and health program.

Ensuring compliance

The safety department is responsible for monitoring compliance with company policy and federal, state, and local laws and regulations. The safety department will help ensure compliance by:

- assisting yard management to acquire and maintain any permits necessary for operations
- conducting informal and formal site, facility and equipment assessments
- regulation review
- assisting in training
- posting OSHA 300

These responsibilities are discussed below.

Permits

The safety department will give direction on the process to obtain required permits for operation. (i.e. ATF, DOT, EPA, etc.)



Conducting assessments

Informal site reviews

The safety department conducts informal site reviews of yards to help managers comply with safety regulations. During the review, the safety department will make recommendations to the local management to correct any noted non-compliance.

Formal assessments

The safety department conducts formal audits to:

- systematically review company facilities and equipment
- ensure compliance with legal requirements and internal standards for environmental and safety matters
- evaluate the success of the safety and health program

Management is responsible for enforcing areas of non-compliance.

Regulation review

The safety department regularly monitors proposed and final regulations and keeps management informed of all regulations that affect company operations.

Training

The safety department:

- advises local management of required training
- helps local management locate cost-effective training if not conducted in-house

Local management is responsible for scheduling required training.

Record-keeping

The safety department will help human resources to acquire the required information for record retention.

- workman's compensation
- regulatory compliance record keeping
- legal action
- drug and alcohol testing
- insurance carrier

The safety department will also provide a uniform filing system for company-wide use.



Management Responsibilities

Purpose

This document describes the responsibilities of the following company management positions with respect to the safety policy:

- The President/CEO
- Line of Business Vice Presidents
- Vice President of HSE
- Region/Division Management
- Yard Management
- Supervisors
- Director of Safety
- HSE Coordinators

General

All levels of management are responsible for:

- maintaining a safe and healthy workplace for all employees
- enforcing all safety precautions and practices
- promoting safe work practices
- attending mandatory monthly safety meetings
- maintaining Company property and equipment in safe operating conditions at all times



Responsibilities of the President and the Vice President of Operations

- The Company President and Vice President of Operations will:
- review and direct safety policies, programs, and procedures
 - support and direct line of business Vice Presidents in fulfilling their responsibilities and attainment of safety goals and objectives
 - provide corporate safety leadership
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Responsibilities of the Vice President of HSE

- The Vice President of HSE will:
- seek to improve company safety performance by establishing;
 - consistent training minimums
 - communications across lines of business and regions
 - company safety goals and objectives
 - providing support and direction to the Director of Safety, HSE personnel and line of business Vice Presidents in attainment of those goals
 - serve as the corporate contact to address safety issues and concerns with customers and governing regulatory agencies, including
 - clearing house companies
 - ensure company's safety performance (injury and vehicle) is completed and distributed
 - collect, analyze, and identify trends to develop improvement plans in attainment of company safety goals
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Responsibilities of Line of Business Vice Presidents

- Line of Business Vice Presidents will:
- provide safety leadership
 - support HSE personnel
 - establish safety goals and objectives consistent with corporate safety goals and objectives
 - ensure business line safety data (injury and vehicle) is accurately compiled and submitted to corporate safety
 - participate in monthly safety meetings within assigned business line
 - ensure yard management fulfills their responsibilities
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Responsibilities of Yard Management

Yard Management will provide safety leadership in their respective areas by:

- assure employees are trained and follow company safety programs
- assign accountabilities and responsibilities
- communicate safety policies to all employees
- evaluate employee feedback on safety issues
- enforce company safety procedures to ensure compliance with company, local, state and federal safety rules

These responsibilities are described in more detail at the end of this document in the paragraphs entitled:

- “Administering the safety policy”
 - “Communicating the safety policy”
 - “Enforcing the safety policy”.
-

Responsibilities of Supervisors

Supervisors will provide safety leadership on the job by:

- communicating safety policies to all employees
- evaluate employee feedback on safety issues and communicate to management
- enforce company safety procedures to ensure compliance with company, local, state, and federal regulations
- respond to and report promptly all incidents
- provide their employees with safety equipment
- comply with all practices in the Safety Employee Handbook

These responsibilities are described in more detail at the end of this document in the paragraphs entitled:

- “Communicating the safety policy”
 - “Providing training”
 - “Enforcing the safety policy”
 - “Responding to incidents”
 - “Equipping employees”
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Responsibilities of the Director of Safety

Director of Safety will provide safety leadership by:

- ensuring corporate and region training requirements are met
 - ensure all safety inspections are completed and addressed with management
 - give guidance and direction to HSE coordinators
 - identify problematic areas
 - communicate all safety concerns to the line of Business Vice Presidents
 - act as a liaison between operations and safety
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**Responsibilities
of HSE
Coordinators**

HSE Coordinators will support management by:

- assisting management in conducting new hire safety orientation
- providing yard management with assistance in conducting monthly safety training
- completing quarterly HSE reviews
- completing quarterly safety equipment inspections
- assisting in the accident investigation process
- assisting in the review board process

**Administering
the safety
policy**

Yard Managers will:

- develop and process reports
- maintain accurate and complete records of safety matters
- recognize individual employees for safety performance
- encourage all employees to take an active interest and participate in accident prevention and safety activities
- review and submit recommended changes to the Vice-President of HSE on a continual basis

Communicating the safety policy

Yard Management and Supervisors will communicate the policy by attending and conducting mandatory safety meetings.

Yard Management will also:

- establish, direct, and serve on safety committees
- post the Federal and State posters on all department bulletin boards
- ensure an active and current hazard communication program is in place
- understand and adhere to the contents of the safety manual, safety handbook and company safety policies

In addition to mandatory meetings, Yard Management and Supervisors will:

- keep the minutes and attendance records of the mandatory safety meetings
- meet with employees once a month to discuss safety issues and conduct training
- talk with employees continually about safety, health and the environment
- post adequate warnings, signage, and placards to notify employees of dangerous conditions
- ensure tailgate meetings and a JSA is completed prior to leaving for location and on location before work begins. Tailgate meetings and a JSA shall be completed any time the task or job changes

Conducting safety meetings

Yard Management, Supervisors and/or HSE Coordinators will hold mandatory monthly safety meetings with their employees to discuss safety issues, including:

- the Company's "Mission Statement"
- ways to prevent accidents
- unsafe practices
- concerns about safety, job procedures, or hazardous materials
- complying with the new safety programs and policies
- conduct training (OSHA required and site specific)
- review material safety data sheets (MSDS) on new substances
- encourage near miss reporting
- promote the Company's "Behavior Based Safety" program (JSO cards)



Providing training

Yard Management, Supervisors and HSE Coordinators will coordinate and/or conduct safety training to teach employees how to perform their jobs and hazardous tasks safely and protect themselves and their fellow workers against injury. This training will occur before the employee starts work. Through our *Short Service Employee Program* the new employee will remain under the close supervision of a qualified employee until he or she can demonstrate competency through the company's qualification process. Only qualified employees may operate equipment.

Enforcing the safety policy

Yard Management, Supervisors and HSE Coordinators will work together to enforce the safety policy by:

- conducting designated inspections of tools, equipment, facilities and procedures as required
- report, document and correct all deficiencies

In addition, Yard Management will ensure that all equipment and all facilities are maintained in a safe operating condition.

Yard Management, Supervisors and HSE Coordinators are also expected to observe their employees on the job and correct unsafe work practices and hazardous work conditions immediately. For more information see *Behavior Based Safety Program*.

Responding to incidents

Yard Management, Supervisors and HSE Coordinators will respond and investigate promptly by:

- completing first reports (injury, automotive, equipment/property damage, spills) within 24 hours
 - identifying unsafe acts and conditions to determine the root cause
 - giving specific direction and a time frame to assign responsible person(s) to prevent reoccurrence
 - filing the required investigation reports within 48 hours
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Equipping employees

Yard Management, Supervisors and HSE Coordinators will provide their employees with:

- emergency first aid equipment
 - safety equipment
 - personal protective equipment
 - fire protection equipment
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**Access to
Medical
Records**

Gravity Oilfield Services will supply medical records to employees or their physician (only) upon their request. The request has to be in writing, identifying the employee with their employee number or SSN. The local management will forward the request to the appropriate Safety office for processing. Please allow 15 working days for processing. No charge for accessing records will be made.



Employee Responsibilities

Purpose This document clarifies the safety responsibilities of all Company employees.

Responsibilities in the workplace Working safely is a condition of employment for all Company employees. Employees will:

- become familiar with and comply with all safety rules, procedures and policies
- work safely and follow instructions
- respect the safety and well-being of fellow employees
- use good judgment at all times
- attend all scheduled safety training and safety meetings

The following table lists specific safety responsibilities of Company employees and identifies the chapters where the responsibilities are discussed.

Employee Responsibility	Safety Manual Documentation
Utilize all personal protective equipment	<i>Ensuring the Safety of the Individual</i>
Assist management in accident prevention and report all: <ul style="list-style-type: none"> • near misses • accidents and injuries • hazards • unsafe conditions • unsafe work practices 	<i>Investigating Incidents; Reporting Incidents; Monitoring Conditions and Operations.</i>
Provide aid when needed	<i>Guidelines for First Aid & Medical Assistance; Developing an Emergency Response Plan</i>
Perform all housekeeping duties related to their jobs	<i>Performing Operations Safely.</i>
Refrain from horseplay or other unsafe practices while on the job	<i>Safe Conduct in the Workplace; Ensuring Safety at Specific Sites and Situations; Performing Operations Safely</i>
Smoke only in designated areas.	<i>Safe Conduct in the Workplace; Fire Protection</i>
<ul style="list-style-type: none"> • Attend all mandatory safety meetings and safety training. • Participate in safety activities 	<i>Code of Safe Work Practices</i>



and safety programs.	
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Required safety meetings

Employees will attend mandatory monthly meetings to discuss safety issues, including:

- ways to prevent accidents
- unsafe practices
- concerns about safety, job procedures, or hazardous materials
- complying with the new safety programs and policies
- receiving training
- completing a test of knowledge
- reviewing material safety data sheets (MSDS) on new substances

IF an employee misses...	THEN...
one meeting,	he/she will: <ul style="list-style-type: none"> ● obtain copies of the materials discussed before the next scheduled meeting, and ● sign an attendance sheet, complete a test of knowledge (if applicable), remediate missed questions, mark the correct response and place initials by the corrected response
three meetings in one year and does not review and sign materials from them,	he/she will be subject to disciplinary action



**Responsibilities
outside the
work place**

In addition, the company expects employees to demonstrate and practice good community relations off the job and when staying out of town while on the job. When staying in a motel, follow the rules as posted. Any unacceptable behavior could result in termination.

All employees should use common sense and good judgment in daily activities to reduce the possibilities of injuries on and off the job.



Contractor/Sub-Contractor Responsibilities

Purpose This document outlines the safety responsibilities of contractors/sub-contractor.

Responsibilities The contractor/sub-contractor will ensure compliance with:

- the company safety policy
- any other company requirements that may be issued
- all government regulations that apply to his/her employees and sub-contractors



Discipline Policy

Purpose

This document sets the guidelines for only handling **safety policy** violations.

Dealing with safety program violations

Employees who violate safety policies and procedures or fail to attend mandatory monthly safety meetings should be disciplined. Yard management is responsible for administering all discipline.

Disciplinary action

Disciplinary action may be increased based on the severity of the infraction. Refer to *Disciplinary Action Program* for more information.