

<b>Transamerican Auto Parts, LLC.</b>	Guideline ID	<b>100</b>
<b>Injury &amp; Illness Prevention Program</b>	No. :	
Topic	Revision Date	1st quarter 2018
Issued By: <b>Director of Service Operations</b>	Effective Date:	January 2018

## POLICY

***Transamerican Auto Parts company, LLC. (TAP) values its people.*** It is the policy of TAP to conduct its operation in a manner that promotes employee health and safety. The health and safety of our employees is a fundamental consideration in TAP's business decisions and plans. As part of our Company's continuing commitment to providing a safe and healthful workplace and pursuant to regulations issued by federal and state Occupational Safety and Health Administrations, TAP adopts and endorses the "*TAP Safety Policy*" attached to this guideline.

Furthermore, "Safety" is every employee's personal responsibility. It is our collective duty to positively adhere to the principles contained in the "TAP Safety Policy" and comply with the local safety rules and procedures applicable to all of us. Together, with teamwork, we can prevent all work-related injuries.

## PURPOSE AND SCOPE

This guideline further defines "general" company requirements and responsibilities for implementing an effective safety process designed to minimize personnel injuries and illnesses within TAP. It does not attempt to define required task-specific procedures needed to assure proper implementation and regulatory compliance at the operational level.

Additional safety guidelines are contained in the "TAP Safety Manual". Each TAP facility must review these guidelines and apply ones pertinent to their operations. Where plans, programs and procedures are required to be written, they must be specific to that facility.

Company operations must also comply with local, state, provincial, or country-specific regulations in addition to implementing these guidelines. Follow the most stringent requirements where conflicts occur, however, never compromise compliance with applicable laws and regulations.

## BASIC PROGRAM REQUIREMENTS

The following elements constitute the "general" or minimum" TAP safety Program requirements. The additional guidelines contained in the TAP Safety Manual must also be implemented as they apply to each individual TAP facility. All TAP facilities must implement site-specific programs, procedures or processes that meet the requirement of each of these elements:

1. Demonstrate and communicate management commitment and accountability.
2. Communicate and enforce safety policy and rules.
3. Conduct employee and contract employee training prior to exposure to work hazards.
4. Provide safety skills training to managers and supervisors.
5. Promote employee involvement and participation in the safety program.
6. Control safety risks from contractors, customers, and visitors while on TAP property.
7. Perform hazard assessments, facility inspections and work observations to identify hazards and promote safe work behaviors.
8. Evaluate and correct hazards that have been identified by employees, inspections, assessments and observations.
9. Report injuries, incidents and near-misses and investigate to identify causes, minimize losses and prevent recurrences.
10. Provide prompt medical treatment and follow-up for work-related injuries or illnesses.
11. Anticipate emergencies and develop and practice response plans.

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## DETAILED REQUIREMENTS

<p><b>1. Demonstrate and communicate management commitment and accountability</b></p>	<ul style="list-style-type: none"> <li>▪ Management commitment towards the safety program must be well defined and communicated to all employees. Each TAP facility is to maintain on site the Complete 2018 Injury &amp; Illness Prevention Program and all documents as part of the program.</li> <li>▪ Every member of management must demonstrate their commitment by observing all safety rules and safe work practices by continuously reinforcing safety requirements, issuing job instructions to employees, and by promptly correcting unsafe conditions and employee actions.</li> <li>▪ Assign a qualified individual(s) to act as the administrator of safety programs. The individual should have the experience and knowledge necessary to effectively manage the facility's safety programs in accordance with the size and complexity of operations and applicable governmental regulations. The knowledge and skills levels of this individual should be assessed and a developmental plan incorporated into their performance agreement.</li> <li>▪ Support and organize safety meeting committee comprised of all staff at each facility regardless of whether the training applies or not. <ul style="list-style-type: none"> <li>○ Meeting attendees should have at least one representative from each department. At least 50% of the attendees must be comprised of non-exempt (hourly) personnel.</li> <li>○ Meeting is to take place monthly, publish meeting management consideration. The committee or meeting attendees may conduct site inspections to identify hazards and make recommendations for corrections.</li> <li>○ Meeting members must be given the necessary time away from their regular job duties to attend meetings, conduct inspections, etc. and receive their regular pay or overtime per payroll administration procedures.</li> </ul> </li> </ul>
<p><b>2. Communicate and enforce safety policy and rules</b></p>	<ul style="list-style-type: none"> <li>▪ Communicate TAP's Safety Policy to employees. <ul style="list-style-type: none"> <li>○ <b>Stress that all employees fully understand that they are not expected to take any risks that may result in an injury and that they will be held accountable for following all facility safety rules and work practices.</b></li> </ul> </li> <li>▪ Develop facility-specific safety rules depending on administrative needs and operational hazards present.</li> <li>▪ Communicate rules and verify their understanding by all employees prior to work assignments. Monitor progress.</li> <li>▪ Enforce safety rules and safe work procedures through consistent progressive discipline if violations occur. Serious violations will result in immediate disciplinary action up to and including employment termination.</li> </ul>
<p><b>3. Conduct employee training prior to exposure to work hazards</b></p>	<ul style="list-style-type: none"> <li>▪ Notification and training are required for employees to understand job hazards, take appropriate protective measures to avoid injury and illness and to meet certain regulatory requirements.</li> <li>▪ Follow training requirements contained in TAP safety guidelines prior to work assignments requiring the applicable training.</li> <li>▪ Ensure employees understand risks associated with job requirements and activities to be performed.</li> </ul>

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<b>4. Provide safety skills training to those assigned the safety responsibility at each facility. (Store Managers, Service Managers, Warehouse Managers, DSI Operation and Pro Comp Operations).</b>	<ul style="list-style-type: none"> <li>▪ Trained supervision is critical in achieving success in safety performance.</li> <li>▪ Each person assigned the safety responsibility should have a minimum of two hours of safety skills training. This training must take place no later than six months from the implementation of this guideline or six months from their initial assignment.</li> </ul>
<b>5. Promote employee involvement in the safety program and provide recognition for individual and team safety performance.</b>	<ul style="list-style-type: none"> <li>▪ Safety programs are employee-driven due to their daily involvement in such programs.</li> <li>▪ Recognition of good safety performance reinforces safe work behaviors and fosters a positive safety culture.</li> <li>▪ Encourage employee input and create opportunities for employee involvement through one or more of the following: <ul style="list-style-type: none"> <li>○ Safety committee or meeting participation</li> <li>○ Work area inspections and observations</li> <li>○ Employee safety improvement suggestions</li> <li>○ Training presentations</li> <li>○ Safety reward games</li> </ul> </li> </ul>
<b>6. Control Safety risks from contractors and visitors while on TAP property.</b>	<ul style="list-style-type: none"> <li>▪ Contractors and visitors must be carefully managed to avoid incidents, injuries, illnesses, property damage, theft, regulatory inspections and fines.</li> </ul>
<b>7. Perform hazard assessments, area inspections and work observations to identify hazards and promote safe work behaviors.</b>	<ul style="list-style-type: none"> <li>▪ Conduct job-specific hazard assessments to identify safety and health risks and control methods associated with each job task.</li> <li>▪ Depending on work assignments, exposure to physical, chemical and biological agents require that initial and periodic monitoring of employee health be performed to assure employees are physically capable of safely performing the job requirements and that protective measures taken (such as ear protection) are effective.</li> <li>▪ Conduct periodic facility inspections and employee work observations to prevent hazards from resulting in incidents. Recognize that most incidents are caused by the unsafe behaviors.</li> <li>▪ Follow-up on issues resulting from incidents, inspections, and work observations to ensure prompt corrective action is taken.</li> <li>▪ Implements the requirements contained in TAP's "Hazard Recognition and Control" guideline to effectively control workplace hazards.</li> </ul>
<b>8. Evaluate and correct hazards that have been identified by employees, inspections, assessments and observations.</b>	<ul style="list-style-type: none"> <li>▪ Correct hazards that are deemed "life-threatening" <b>immediately. <i>Halt operations if necessary or construct temporary safeguards until permanent controls are in place.</i></b></li> <li>▪ Prioritize multiple hazards found during inspections and assessments and address the ones representing the highest risk first</li> <li>▪ Evaluate the most effective means of controlling hazards. It is required to first attempt to eliminate or permanently control the hazard through engineering solutions, but when this is not feasible, protective equipment, training and administrative controls may be utilized if effective.</li> </ul>

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<p><b>9. Report incidents and investigate to identify causes, minimize losses and prevent re-occurrences.</b></p>	<ul style="list-style-type: none"> <li>▪ Implement the requirements contained in TAP's "Injury Reporting and Investigation" guideline to report and investigate incidents correctly and promptly and to record incident data properly.</li> <li>▪ Verbally report serious incidents (disabling injuries, hospitalizations, all fires, workplace violence, etc.) to Regional Managers AND Service Operations within 8 hours.</li> <li>▪ Promptly report worker's compensation claims to TAP's workers' compensation administrator within 24 hours of learning about the incident to minimize the claim's cost.</li> <li>▪ Focus incident investigations towards objectively finding root causes and system errors. Do not try to place blame on any person(s).</li> </ul>
<p><b>10. Provide prompt medical treatment and follow-up for work-related injuries and illnesses.</b></p>	<ul style="list-style-type: none"> <li>▪ When work-related injuries and illnesses occur, prompt medical attention must be available to employees through internal first aid/CPR response and qualified professional medical care (preferably specializing in occupational medicine).</li> <li>▪ Practice effective post-injury follow-up, such as accompanying injured employees to medical facilities when feasible, calling employees at home and offering alternative work assignments, to demonstrate management's concern and ultimately promotes a more rapid recovery.</li> <li>▪ Implement TAP's policy on "Return-to-Work" including limiting individual employee transitional work assignments to 12 weeks or obtaining TAP Director, Safety and Workers' Compensation approval for longer periods.</li> <li>▪ Injured temporary workers (non-Transamerican Auto Parts employees) must not be placed in transitional or "light-duty" assignments. If placed on medical restrictions and not able to perform normal job tasks for TAP, they should be sent back to the temporary agency for re-assignment or medical leave as determined by the agency.</li> </ul>
<p><b>11. Anticipate emergencies and develop and practice response plans.</b></p>	<ul style="list-style-type: none"> <li>▪ Minimize human and property losses by being prepared for fires, security issues and natural disasters.</li> <li>▪ Develop, communicate and practice emergency response plans to help assures effective implementation.</li> <li>▪ Implement TAP's "Emergency Organization Plan" guideline to develop site-specific planning for emergencies.</li> </ul>

## ATTACHMENTS

### APPENDIX

- Injury & Illness Program 2018
- Emergency Response Plan (site specific)
- TAP companies Safety Policy Letter from CEO
- Monthly IIPP REPORTING AND RECODING FORMS (4 pages)
- Tap companies **guideline ID # 101, 102**