



Health, Safety, and Environmental Policy Manual

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General Policies

I. Health, Safety, and Environmental Management

Seven Sisters Environmental, Inc. (SSE) has developed and implemented this set of Health, Safety, and Environmental (HSE) policies to ensure that SSE employees have the knowledge, training, and skills necessary to maintain the safest possible work environment. SSE is currently a very small company and many of these policies and procedures may seem disproportionately detailed, however these policies have been developed anticipating corporate growth so that HSE policies are not developed piecemeal, resulting in an in a plan lacking consistency and continuity.

It is SSE's policy that all employees are held accountable to the provisions laid out in this manual as well as any safety or environmental policies, mandates, or requirements imposed by our clients and customers while working at facilities under their operational control. If there is a conflict between the requirements of SSE policy and a client's policy, the most conservative (i.e., safest) policy shall be the policy that prevails.

To ensure SSE's top-to-bottom commitment to providing a safe work environment for all SSE employees and any person working within the 'sphere of influence' of an SSE employee, the Corporate Safety Officer (CSO) for SSE is the President, a post currently held by Mr. Jack Matthews. The CSO is responsible for managing SSE's safety program and implementing the policies and procedures articulated in this manual.

The CSO will annually conduct a full audit of the documentation, training, and implementation of these policies as well as the environmental and safety performance metrics of the Corporation. Specific changes will be made to any part of this plan whenever indicated by regulatory requirements, changes in operation, changes in industry recommended practices (NIOSH, OSHA, etc.), or as recommended through the Incident/Accident Investigation or Near Miss Evaluation processes. A report will be prepared and presented at the annual Shareholders Meeting in accordance with Bylaws of SSE.

When working at a client owned/operated facility for the first time, it is the SSE employee's responsibility to become familiar with the site-specific procedures and policies for safe operations. These procedures and policies include, but are not limited to:

- Personal Protective Equipment (PPE) required
- Personal monitors required
- Emergency alarms, signals, or sirens
- Emergency response plans and responsibilities

- Location of muster stations, fire extinguishers, eyewash stations, safety showers, and other safety equipment
- Potentially hazardous conditions and exposures, including
 - High pressure processes
 - High or low temperature processes
 - Hazardous chemicals (e.g., carcinogenic chemicals such as benzene, toxic gases such as H₂S or CO, flammable gases and liquids, suffocating gases such as N₂ or CO₂, etc.)
- Mechanical hazards
- Any other special hazards

No contract or client is more important than personal safety. If a client or customer asks an SSE employee or contractor to participate in a work activity that is judged unsafe, it is the SSE employee's/contractor's responsibility to refuse to comply with the request and report the request to the highest levels of SSE management. Many of our clients have a 'stop work' policy that empowers any employee or contractor to stop work on a project if an unsafe condition exists. If the client has such a policy, then it is the responsibility of the SSE employee to exercise that authority if an unsafe condition exists. No SSE employee or contractor will suffer retribution or discipline for refusing to work in an unsafe environment.

Because of the nature of the work we do, SSE employees will NOT directly manage some of the programs and/or activities described in this manual. The activities that SSE employees are not qualified to manage will be clearly described at the beginning of each section. Management of some of these specific activities is the responsibility of an appropriately qualified Safety Professional, usually hired by the owner/operator of the facility in which we work. However, every SSE employee will have a working knowledge of each of these programs so that they can work effectively and safely in environments where these processes are employed. A working knowledge of these processes and programs is also essential in identifying an unsafe working condition as described above.

Endorsed by:



Jack Matthews, President
Seven Sisters Environmental, Inc.

2-18-09
Date

II. Drug and Alcohol Policy

Because of our concern for the safety of our employees, our property, the public and our concern about the productivity of our workforce, SSE has adopted a Controlled Substance Use & Alcohol Misuse Policy that is applicable to all employees. Our purpose in adopting this Policy is to further the objective of establishing and maintaining a work environment free from the adverse effects of drug use and alcohol misuse.

Because of the importance on maintaining a safe and drug-free work place, the SSE Drug and Alcohol Policy has been fully developed, and is documented and maintained separately in the SSE office.

A brief description of the components of that program follows below, but the details and official documentation are maintained in the above referenced binder maintained at the SSE home office in Fort Collins, Colorado.

Per the SSE D&A Policy, every SSE employee:

1. Is prohibited from using, possessing, selling, purchasing, manufacturing, distributing, or transferring alcoholic beverages and/or controlled substances and/or other performance impairing substances while on duty and/or on SSE property; and,
2. Is prohibited from being on SSE property and/or reporting to work or performing work with a measurable amount of alcohol and/or controlled substance and/or performance impairing substance in his/her system; and,
3. Is prohibited from the consumption of alcohol within four hours of the employee's scheduled time to report for work, or within eight hours following an accident or until the employee takes a post accident alcohol test, whichever occurs first; and,
4. Is required to submit to an alcohol and/or drug test when directed by the SSE; and,
5. Is prohibited from tampering (adulteration and/or substitution) or attempting to tamper with any alcohol and/or drug test and/or interfering with the testing/collection process; and,
6. Is required to notify his/her supervisor within five calendar days of any conviction for a drug related crime; and,
7. Is responsible for informing his/her physician when being prescribed medication(s) that he/she is covered under the terms of this Policy. The employee shall use medically authorized drugs and/or over-the-counter medications in a manner which will not impair job performance; and,
8. Shall promptly report to his/her supervisor whenever he/she is prescribed and/or uses an over-the-counter medication that might cause job performance impairment.

SSE maintains a contract with DISA, Inc. to provide the drug and alcohol program's screening, testing, Medical Review Officer functions, and recordkeeping required by the SSE D&A Policy. SSE will provide employee training on the SSE D&A requirements. Records showing compliance with the random testing and testing results will be made available to any customer / client who wish to inspect those records.

