



*Building communities
from the ground up*

Rogers Group, Inc.

**SAFETY
HANDBOOK**

Revised November 2007



ROGERS GROUP, INC. SAFETY POLICY

“We are committed to achieving a zero-injury safety culture by implementing all Rogers safety principles without compromise.”

Revised November 2007

*Jerry Geraghty, President & CEO
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**ROGERS GROUP, INC.
EMERGENCY AND NON- EMERGENCY
REPORTING PROCEDURES**

A. DEFINITION OF A REPORTABLE INCIDENT

All of the following are "Reportable Incidents" for purposes of this procedure.

1. Any event resulting in personal injury reportable to MSHA or recordable for OSHA
2. Any event that could have or did result in a minor injury (not reportable or recordable)
3. Any event with or without personal injury that caused property damage, theft, environmental contamination and/or loss of operating capability
4. Any event resulting in a claim by a non-RGI person(s) or adverse community impact

B. EMERGENCY ACTIONS

1. The following are a list of incidents that require "Emergency Action Procedures" to be followed by Rogers' employees:
 - a. A fatal injury to an employee or third party (including trespassers) on RGI premises or work sites or while an employee is away from RGI and on company business.
 - b. Injury to an employee or third party (including trespassers) on RGI premises or work sites or while an employee is away from RGI and on company business requiring hospitalization or emergency medical treatment.
 - c. Any missing, stolen (or known attempts to steal) or unaccounted for explosives or other blasting materials stored at an RGI location or on a job site.
 - d. Theft or vandalism of any RGI property over \$2,000.
 - e. Damage to RGI property (buildings, automobiles, equipment) resulting in property being destroyed or inability to conduct normal business operations.
 - f. Any hazardous material release into a waterway (lakes, streams, etc.) or into the atmosphere.

2. EMERGENCY ACTION PROCEDURES (ALL TO BE NOTIFIED AS SOON AS POSSIBLE, BUT NO LATER THAN WITHIN 2 HOURS OF THE INJURY/INCIDENT):

- a. Contact appropriate police, fire, or ambulance/rescue services.
- b. Call Local Management.
- c. **Call Safety Management. Safety will verify that appropriate notifications have been made.**
- d. Local Management to call Tom Kenley to coordinate Media Relations (TV, News, etc.)
- e. Call Risk Management.

C. INJURY/INCIDENT REPORTING PROCEDURES

For all events requiring "Emergency Action" as defined in Item B above as well as all other events not classified as requiring "Emergency Action", when an injury/incident occurs and the necessary steps have been taken to render assistance and otherwise control the scene, the following additional steps must be accomplished:

1. The "Injury/Incident Report" must be completed in its entirety for any incident. (Thorough and complete documentation of the incident including facts, sequence of events, witness statements, photographs as necessary, must be obtained and collected.)
2. Basic information must be entered into the ORACLE system within 24 hours following all incidents. An injury/ incident may be an injury, first aid, property damage, near miss and/or environmental issues. When in doubt put it in the system. This step is critical due to governmental regulations and insurance requirements. Additional information may be added when the investigation is complete.
3. Determine if the incident is reportable to the respective governmental agencies such as MSHA, OSHA, DOT, etc. If in doubt, call Safety.
4. If the injury/incident occurs on public property, such as roadways, or parking lots, etc., call the police and a police report may be required. If so, a copy of the police report should be obtained.
5. Send all related bills, police reports when applicable, and estimates, etc. to Risk Management. Include appropriate information to identify the incident such as referencing the incident number on all documents.
6. Employees are to have a substance abuse test following any incident where there is personal injury or property damage to either RGI or the third party's property, or when at fault.
7. **Any lost time incident is required to be called into LINDA BOONE WILLIAMS, RISK MANAGEMENT, 615-780-5716.**

EMERGENCY CONTACTS

SAFETY	Office	Mobile	Home
BILL CARPENTER	O: (812) 335-5414	M: (615) 478-5383	H: (317) 722-0004
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RISK MANAGEMENT	Office	Mobile	Home
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LEGAL/MEDIA	Office	Mobile	Home
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**ROGERS GROUP, INC. and AFFILIATES
SAFETY PROGRAM**

Revised January 2006

ROGERS GROUP, INC. SAFETY POLICY

“We are committed to achieving a zero injury safety culture by implementing all Rogers safety principles without compromise.”

I. PROGRAM

A. Administration

The Safety Program will be administered by all employees with support and consultation from the Safety Department.

B. Eliminating Unsafe Acts

Safety is based on the fundamental truth that elimination of unsafe acts will eliminate 90% of all injuries.

C. Housekeeping

This is a fundamental requirement that all operations maintain good housekeeping at all times. Prior to beginning work all areas should be inspected and any housekeeping deficiency should be corrected. At the conclusion of work the same must be done. Follow the 5 “S” principles. Sort, Straighten, Shine, Standardize, and Sustain.

D. Investigations, Audits, and Training

1. Incident investigation and reports

a. Definitions:

Injury: Any event resulting in personal injury requiring medical treatment that is recordable to OSHA or reportable to MSHA.

Incident: Any unplanned event that could have or did result in First Aid, significant property damage, loss

of operating capability, claim by non-RGI person(s), or an event with adverse community impact.

Near Miss: Any unplanned event or medical treatment that could have resulted in an injury (defined above) but did not.

b. Investigating incidents: Every Injury, Incident, and Near Miss would initiate the development of an Investigation Team. This team must be comprised of and led by RGI employees who have been taught the Incident Investigation components of the Safety System. Preliminary information on any medical treatment "Near Miss", injury, and/or incident must be entered into the ORACLE HR system within 24 hours or the next business day. After the team has completed its investigation the appropriate Alert should be prepared and communicated to all employees and entered into the ORACLE HR. Any change in the incident must be updated in the ORACLE HR such as going from an "injury" to a "lost time". The purpose of incident investigation is to identify root causes and contributing factors that can be corrected to promote a safer working environment and to communicate lessons learned to other operations. If we learn the cause of an incident, we will know the who, what, when, where, and why of the incident.

2. Audits – Formal and Informal

In order to provide a workplace free from unsafe behavior and hazards, we must identify them and eliminate them. One tool to assist us in doing this is the Formal Audit. **The overall objectives of the formal audit are to build safety awareness, verify training effectiveness, and raise safety standards.** The location or crew conducting the audit must assemble a Safety Audit Team. This team must schedule the audit in advance and announce that it will be taking place. The audit will have a time limit of one

hour or less. During the audit, the team will be looking to identify primarily, Unsafe Acts and secondarily, Unsafe Conditions that may exist having the potential to injure an employee, Safety Standard Violations, and Safe Acts. During this audit, the team will make contact with as many employees as possible seeking their input on methods to make the workplace safer. Once the allotted time has expired, the team must complete the Formal Audit form. Responsibility for correction of each Unsafe Act and Unsafe Condition must be assigned. A reasonable date for each to be corrected must be assigned. Each **Unsafe Act** must be stopped at the time it's observed by the Audit Team. Stop the act without causing harm to the employee and explain the repercussions of performing the task unsafely. Ask for the employee's commitment to perform the task safely in the future. **Informal Audits** will achieve the same goals as the formal audit. Unsafe Conditions are normally beyond the direct control of employees in the area where the condition is observed. **Unsafe conditions** must be corrected in a timely manner. Unsafe Acts and Conditions will be addressed by the individual performing the Informal Audit and will not be documented on a Formal Audit form. Informal Audits should be conducted on an ongoing basis.

3. Employee safety orientation and training

- a. All newly hired aggregate employees will receive Part 46 or Part 48 training according to the Aggregate New Hire Training program. All newly hired construction employees will receive training according to the Construction New Hire Training program
- b. All aggregate employees will receive Part 46 or Part 48 training per each location's Training Plans.
- c. All construction employees will receive training according to their Training Plan.
- d. All employees transferring from construction to aggregate or from aggregate to construction must be trained according to the Training Plan for the receiving segment.
- e. It is of utmost importance that each employee be trained to the hazards of their task assignments and methods to avoid injury prior to work.

E. Safety Program Stimulus

The Supervisor will coordinate group safety meetings. The Supervisor will ensure that employees continue learning about safety through the various sources available on the RockPile Safety Page, MSHA, OSHA, or other methods of gaining safety knowledge. A daily safety contact by the supervisor with each employee under his or her direction is required.

F. Safety Incentives

1. Incentive programs of all types, both short and long range, may be implemented according to need by geographic area, specific company, operation, department, crew, or combinations of same.
2. Monetary incentives are not recommended.

G. Safe Operating Procedures

An SOP is a complete step-by-step outline of actions to execute a task or operation of equipment. This includes **all aspects** such as safety, efficiency, quality, productivity expectations, housekeeping guidelines, etc. It is a set of instructions or steps someone follows to complete a job safely, which meets compliance standards, and in a way that maximizes operational and production requirements. Local management should evaluate their work areas to determine where SOPs could improve the safety and productivity repeated job tasks and develop SOPs as needed. Completed SOPs should be shared company wide.

H. Discipline

Discipline is the process used to develop proper work habits that contribute to preventing incidents. This process may be positive, such as praise when a job is done properly, or punitive, as in a written warning letter for improper work habits. Each manager/supervisor is responsible for administering appropriate discipline. Proper documentation is required for all forms of discipline. Refer to the Discipline Policy for a more detailed explanation. Disciplinary action resulting from events leading to an Injury, Incident, or Near Miss must remain separate from the investigation process.

I. Rogers Group's Cardinal Rules of Safety

Violation of the below listed Cardinal Rules of Safety will result in disciplinary action that, at a minimum, shall consist of a three (3) day suspension without pay, or, in management's discretion, such other more stringent action as may be appropriate under the circumstances, up to and including termination of employment.

1. **Fall Protection:** Fall protection must be used where required and the user must be properly tied off in all applicable situations.
2. **Lockout:** The Energy Lockout Plan must be followed.
3. **Trenching:** Applicable regulations must be followed and a competent person must oversee all trenching activity.
4. **Falsifying Records:** The failure to properly document any required State and Federal Regulation safety record which could result in serious injury or death such as equipment inspections, work area inspection, etc.
5. **Horseplay:** This would include any activity such as practical jokes, wrestling, fighting, or other violent acts. Any verbal threat or physically threatening act will be considered the same as if it were carried out.
6. **Unsafe Work Platform:** Working out of a loader bucket, using a ladder improperly, or use of any platform not designed as such are not allowed.
7. **Seat Belts:** Wearing seat belts while operating or as passengers in all Company vehicles and equipment, where required, is mandatory. Employees will also require non-employees to wear seat belts while in Company vehicles or applicable equipment.
8. **Substance Abuse Policy:** Disciplinary actions for violations of the Substance Abuse Policy are covered within the Policy.

Safety Guidelines (Introduction)

Safety guidelines are the most efficient, effective and safe way to do your job. They are based on experience and conditions that can result in incidents. The following guidelines are general and not intended to address every circumstance. Your supervisor will give more specific instructions. Knowledge of the rules for your job will benefit everyone.

I. Personal Protective Equipment Guidelines

(These are minimum requirements, check with your supervisor for specific requirements at your work site.) Keep your company issued personal protective equipment in good condition and in compliance with all regulations and manufacturer instructions. When necessary, turn in worn or damaged items for replacement. Without an exchange you are responsible for replacing the item.

1. **Hard Hats**. Always wear an approved hard hat where required while on duty, unless specifically exempted. Newly hired employees shall wear a green hard hat for their first year of employment. Wearing ball caps under the hard hat is prohibited.
2. **Eye Protection**. Wear safety glasses, goggles, and/or appropriate face shield whenever eyes and face are at risk to physical or chemical hazards. Eye protection is mandatory at certain operations.
3. **Hearing Protection**. Use hearing protection when you must raise your voice to be heard over the surrounding noise. Check with your supervisor and refer to the Hearing Conservation Plan.
4. **Respiratory Protection**. Use an approved respirator when working around or in dust, sand blasting, paint or chemical mists, etc. Check with your supervisor, refer to the general Respiratory Protection Plan and/or the specific plan for aggregate operations.
5. **Hand Protection**. Wear gloves whenever your hands are at risk from physical or chemical hazards.
6. **Foot Protection**. Wear sturdy work shoes or boots. Steel, plastic or composite safety shoes/boots are mandatory at certain operations.
7. **Flotation Devices**. Wear approved flotation devices when working around water.

8. **Reflective Vests.** High visibility reflective vests that contrast with jobsite background shall be worn when employees are exposed to public or private traffic.
9. **Fall Protection.** Each employee on a walking/working surface with an unprotected edge, which is 6 ft or more above lower/ground level or where there is a chance of falling, shall be protected by the use of a personal fall arrest system, guardrail system, or safety nets.

II. General Safety Guidelines

1. Compliance with safety regulations: All employees, operations, and facilities will comply with federal, state, and local safety regulations.
2. Park private vehicles in specified areas.
3. Follow all posted warning signs and posters.
4. You are encouraged to suggest ways of making your job and work area safer. Voice your concerns to your supervisor. Direct questions about the safest way to do a job to your supervisor.
5. All first aid kits must contain disposable rubber gloves and a disposable one-way respirator mask. Refer to the "Exposure Control Plan" for details.
6. Clothing: Long pants and shirts with sleeves are to be worn. No tank tops or shorts are allowed. Exceptions made for flaggers wearing long flagger pants over shorts.
7. Make sure suspended loads are securely blocked from movement before walking or working around them.
8. Thoroughly check your equipment and work area for hazardous conditions. Report any unsafe condition to the person in charge.
9. Possession of firearms, on or in Company property or job site, is prohibited except for hunting firearms, unloaded, cased, and only in specified company parking areas.
10. Do not operate, repair, or ride any vehicle or machine unless trained, qualified, and authorized to do so.
11. Passengers may ride only on equipment having applicable provisions. Riding a vehicle's load is strictly prohibited. Riding material hoists, crane loads, or headache ball is prohibited.
12. When lifting, keep your back straight. Tighten abdominal muscles. Use your legs to lift the object, not your back. Get help when needed. Refer to the Rogers Back Program on the safety page of the RockPile.
13. Keep oxygen and gas cylinders upright and secured. Make sure caps are in place and protected from falling objects.

14. Know where fire extinguishers are located and learn how to use them. Make sure the extinguisher is properly charged and inspected. Use the appropriate extinguisher for the type of fire.
15. Only trained and qualified persons will handle and use explosives. Smoking, firearms, matches, open flames, or other possible ignition sources are prohibited in or near explosive magazines or while explosives are being handled or used.
16. All manufacturer instructions and warnings, as well as applicable regulations, will be followed to prevent the unintended discharge of blasting caps. This includes the use of 2-way radios, cell phones, or other electronic equipment.
17. Use a flagger when signs, signals, and barricades do not provide the necessary protection on or adjacent to a highway or street. When exposed to traffic, use warning lights and wear reflective high visibility vests. Flaggers must be trained according to uniform traffic control standards before being assigned.
18. Unauthorized passengers are not permitted in company-owned vehicles.
19. Keep guards and protective devices in place at all times. Be sure mechanical safeguards such as cover plates, gear guards, and/or belt guards, etc., are replaced and/or repaired before regular machine operation.
20. When parking or otherwise leaving equipment for any period of time, all operators must park in such a fashion that it eliminates, or minimizes backing the equipment. It also should be secured to prevent unauthorized operation or startup.
21. Barrels, boxes, chairs...are not to be substituted for ladders. When working from portable ladders, properly position the ladder. Employees must wear an approved fall protection device with the lanyard secured to a fixed object.
22. Use three points of contact when climbing/dismounting equipment, fixed objects, or when climbing/descending portable ladders. Always dismount facing the machine or object. Do not carry items or tools, instead use hand lines or pouches. Never jump.
23. When appropriate, use protective screens around welding operations to protect others from eye injury.
24. Keep all hand and power tools and similar equipment in safe condition. Repair or replace defective or broken tools. The use of broken or cracked handles, mushroomed hammers, chisels, punches, bars, and other faulty equipment is prohibited.
25. Use a safety tire rack, cage, or equivalent protection when inflating, mounting, or dismounting tires installed on split rims, or rims equipped with locking rings or similar devices. When

- inflating off-road tires, use an extension and stay out of the trajectory of tire.
26. Keep tools off scaffolds, walkways, ladders, or overhead working spaces when not in use. Use containers for tools when working on scaffolds, personnel lifts, or ladders.
 27. When operating loaders, dozers, scrapers, graders, and similar equipment, always lower blades, buckets, bowls, etc. when not in use.
 28. When using cranes, make sure rigging material and the crane are rated for the load being moved. Make sure all loads are centered before lifting. Before lifting, check all rigging material or defects and coordinate signals with crane operator. To communicate effectively, only one person shall give signals to the crane operator. The operator shall be RGI certified.
 29. Smoking is not allowed in the immediate area of painting. Wear personal protective equipment (respirator, safety glasses, protective clothing, etc.) when painting. Keep paint areas free of all debris that might create fire hazards. Observe all safety precautions given by paint manufacturers in handling, mixing, and painting with all paint products.
 30. Keep aisles and passageways clear so that people and material handling equipment can move freely and safely.
 31. Know the procedures to follow in case of emergency, i.e., location of first aid kits, radio call procedures, and telephone numbers for ambulance, fire, and police, etc. Where applicable, practice emergency response procedures or evacuation plans on a regular basis.
 32. To ensure the safety and health of employees at surface locations use the work place examination form to perform a work place examination.
 33. Each equipment operator must conduct and complete a pre-operational safety inspection and communicate to the supervisor any item not being satisfactory. When required, a form must be completed documenting the inspection. These forms should be retained for 30 days or until the defect(s) are corrected. Also, each operator must communicate to their supervisor immediately if any item affects the safe operation of the equipment during the course of the day's activities; the supervisor is required to act to correct this. Never operate unsafe equipment.
 34. Each operator is responsible to keep the equipment under control at all times.
 35. Before each operator resumes travel after dismounting from a machine, the operator must ensure that the area around the machine is clear and sound the forward horn.

36. An effective system to load and unload equipment or material must be used, i.e. winch, crane, etc. Properly secure loads before hauling.
37. All employees operating licensed trucks of more than 10,001 lbs. GVWR (gross vehicle weight rating) on public roadways shall be DOT qualified.
38. When breaking down or uncoupling trailers or sections of trailers, each unit shall be securely blocked from rolling, and blocked from falling.
39. Each employee is responsible for the housekeeping and the general appearance of their work area and equipment.
40. Each employee is responsible for performing a work place examination to ensure the area is safe and clean.
41. Drivers operating trucks equipped with booms must ensure that the booms are in their resting place, the remainder of the load is properly secured, and that the outriggers have been raised before leaving.
42. Dump beds, booms, and buckets from loaders, backhoes, or shovels shall not be raised within 10 feet of overhead utility lines.
43. Ensure all bed indicator-warning systems are working properly and the truck moves no more than needs for dumping load.
44. Any time belts are attached to a drive motor, the belts must be removed prior to assembly and/or disassembly.
45. Operators of fork trucks must be trained and RGI certified.

III. RESPONSIBILITY

- A. CORPORATE MANAGEMENT is responsible for:
Safety and program administration aimed at minimizing work-related illness and incidents. Corporate management is prepared to take any necessary steps to ensure the safety of all employees through an aggressive Safety Program.
- B. Corporate Safety Committee
 1. **Purpose:** To promote a safe and healthy environment for all RGI employees.
 2. **Methods:** Support, Recommend and Evaluate actions toward the development of a zero injury safety culture.
- C. The Corporate Safety Staff is responsible for:
 1. Promoting Rogers' Safety Principles.
 2. Evaluating performance in relation to the safety principles
 3. Advising management on safety issues.
 4. Providing resource information and materials on safety.
 5. Analyzing company safety needs.

6. Assist field operations with safety issues.

D. Managers are responsible for:

1. Leading safety and ensuring development of the Safety Principles throughout their sphere of control.
2. Ensuring formal and informal audits are being conducted in their area of responsibility. Ensuring that Unsafe Acts and Unsafe Conditions are addressed and corrected in a timely manner.
3. Overall operational safety and health.
4. Ensuring that safety programs and plans are implemented and encouraged.
5. Ensuring that corrective action is taken when an incident or other condition makes change necessary.
6. Monitoring the quality of incident investigations/formal audits.
7. A minimum of one formal audit per month with follow up.
8. Promote good housekeeping with the 5 "S" principles.

E. Supervisors are responsible for:

1. Leading safety and ensuring development of the safety principles.
2. Ensuring formal and informal audits are being conducted in their area of responsibility. Ensuring that Unsafe Acts and Unsafe Conditions are addressed and corrected in a timely manner.
3. Eliminating unsafe acts.
4. Enforcing safe work practices.
5. Maintaining safe working conditions.
6. Carrying out safety recommendations promptly.
7. Instructing new employees on the safety system and proper safety procedures.
8. Providing and enforcing use of personal protective equipment.
9. Coordinating safety meetings.
10. Initiating care for injuries.
11. Investigating incidents thoroughly.
12. Providing timely reports of incidents.
13. Promote good housekeeping with the 5 "S" principles.
14. Conducting informal audits with appropriate feedback to each employee daily.
15. Encouraging Near Miss reporting and investigations.
16. A minimum of one formal audit per month with follow up.

F. Employees are responsible for:

1. Leading safety.
2. Safe work habits and compliance with all safety directives.
3. Modifying behavior when necessary to develop safe work habits.
4. Actively observe behavior of co-workers and address any unsafe behavior.
5. Wearing and maintaining required personal protective equipment.
6. Reporting all incidents immediately to the supervisor of the area where the incident occurs and your immediate supervisor.
7. Participating in Safety Audits, incident investigations and safety meetings.
8. Maintain good housekeeping with the 5 "S" principles.
9. Reporting unsafe conditions.
10. Utilize JSAs in all work activities.
11. Suggest ways to improve RGI's "Safety Culture".

IV. CHANGES TO OR TERMINATION OF POLICY

This policy may be changed or terminated at any time at the discretion of the Chief Executive Officer without notice to any employee.

SAFETY PRINCIPLES

Management Commitment: Leaders are directly involved in demonstrating safety responsibility – committee involvement, informal and formal audits, investigation involvement, safety communications, etc. Demonstrate that safety is a business priority including all operations management positions (supervisors, area managers, executives, etc.).

Safety Training: All operations supervisors are responsible for ensuring that employees receive continuing safety training and education according to the site training plan, regulatory requirements and through safety meetings, on the job task instruction, and specialized training according to job requirements, etc. Supervisors are responsible for developing the site safety plan and are directly involved in planning and presenting safety training and education. Supervisors must be sure that records of training are kept on each employee. Supervisors must confirm that a method is in place to assess training effectiveness as well as the quality and scope of training plans. Safety meetings must be reviewed by management periodically for quality. **Safety Policy, Cardinal Rules, and Goal “Zero” are understood.**

Audits: Formal audits are done according to a set schedule (minimum of one per month). All supervisors/managers must ensure each crew and/or location has a minimum of one formal audit per month. All supervisors/managers not assigned to a specific crew or location must perform a minimum of one formal audit per month. The supervisor is responsible for ensuring that a record of formal audits is maintained and entered into the Safety Audit System. The crew or location supervisor is responsible for ensuring follow up requirements are met. Informal audits are done continuously by anyone receiving the necessary training. Formal audits must be posted and or communicated to all appropriate employees by the responsible supervisor. Higher management must initiate a system of review for audit quality with overall objectives of building safety awareness, verifying training effectiveness, and raising safety standards. The data is to be used to prevent injuries. Names are not to be used in the formal audit report. Any unsafe behavior identified during the audit must be addressed immediately, with all involved reaching safety agreement.

Injury/Incident Investigation & Analysis: All injuries and incidents can be prevented and prompt, thorough investigations of all injuries and incidents can help avoid similar occurrences in the future. A team will investigate all injuries and incidents. Investigations must focus on causes and events, not in finding fault. The supervisor is responsible for ensuring that a follow up system is in place to carry out recommendations. A process of periodic injury/incident data analysis must be in place for each location/crew, area, segment, division and

corporation. All injury investigation reports will be shared throughout the company. **Local operations staff will send preliminary injury information to all employees within 24 hours (email, fax, etc.) and the final report will be handled similarly once complete.** Any potentially serious incidents will be shared as appropriate. (All injuries and incidents will be entered into the Oracle.) **The legal department will investigate third party incidents.**

Employee Involvement: All employees are involved in the safety effort. All employees are accountable for working safely. Working safely as a condition of employment is a basic principle of our company. Supervisors must be sure that an award, recognition, and discipline system is in place and understood by all employees.

Line Responsibility for Safety: Supervisors carry out safety recommendations promptly, communicate all safety matters to employees, and are directly involved in all safety training, etc. They demonstrate a sincere care and concern for people. **Supervisors must have a daily safety contact with each employee under their direction.**

Safety Committees: Corporate and Division committees will be active and emphasize results. The primary focus is on implementing all elements of the "Safety Culture". Additional committees such as Business Segment (construction, aggregates) and location are at the option of each respective unit.

Job Safety Analysis with Local Rules and Procedures Established: Job Safety Analysis will be completed by the supervisor and employees involved for any critical tasks. Local supervision must evaluate work conditions and develop site-specific rules and procedures to address identified hazards. Established JSAs must be reviewed for possible changes by supervision and hourly employees each time it is used. All non-routine activities should be considered for a job safety analysis and special planning. For major non-routine activities, appointing special observers should be considered.

Local Safety Communications: General safety information, incident reviews, near misses, incident reports from other work units, motivational information, etc...will be communicated verbally and posted on bulletin boards where possible by supervisors. Safety Policy, Cardinal Rules, and Goal "Zero" is verbally communicated and posted conspicuously where possible. Operations managers are responsible for ensuring that open safety communication exists between hourly employees and all levels of management.

JOB SAFETY ANALYSIS PROCESS (JSA)

**A formal JSA is required
for any significant task or job.**

WRITTEN

Routine jobs are selected based on their risk evaluation. Written analyses are done and referenced in new hire, task, and refresher training. Examples of routine jobs would be: Loader Operator, Truck Driver, Plant Operator, Roller Operator, Construction Labor, etc. In addition major projects require a JSA of each safety critical phase or segment.

ORAL

Non-routine tasks require that prior to starting the job the persons engaged in the task must review the job steps, identify the hazards, and plan measures to reduce or eliminate the hazards. This is an oral process and findings must be reviewed with every person working on the task. Examples of non-routine tasks would be: repair on haul truck, special traffic control conditions, periodic maintenance on a crusher, removal of a hang up in a chute, repair on a conveyor drive system, etc.

JOB SAFETY ANALYSIS PROCESS

Job Safety Analysis is a process where the hazards associated with each step of each job or task are identified, and control measures are put in place to minimize the risk to employees, equipment and property.

How to Develop a JSA: Assess the risks or hazards

Consider the following: What! When! How! Where! Who!

1. What exactly am I going to do?
2. What materials will I be dealing with or handling?
3. What tools and equipment will I be using?
4. When will the job be done? Day/night.
5. How might the job affect other: People, activities and equipment?
6. How might the job be affected by others: People, activities and equipment?
7. Where will the job be done?
8. Has the job changed since the last JSA?
9. What level of risks or hazards is present? How can I eliminate or reduce risks or hazards?

JSA DEVELOPMENT GUIDE

STEP 1 Break Job into Logical Steps:

1. Identify simple steps and the sequence they are to be performed.
2. Generally limit to less than ten steps.

STEP 2 Identify the Hazards in each Step:

- *Consider the following physical hazards:*
 - Pressure, Vibration, Access, Moving Objects, Electricity, Chemicals, Vehicles, Height, Confined Spaces, Depth, Weather, Noise, Rotating Equipment, Weight, Equipment, Heat, Cold, Water, Dust, etc.
- *Consider the following mechanisms of injury:*
 - Struck by, Caught in/on, Overexertion, Dropped Objects, Slip/trip/fall, Inhalation, Strike Against, Fire/Explosion, Exposure to Gas/Heat/Fumes/Dust/Chemicals/Cold, Pinch Points.
- *Also consider:*
 - Pollution to the Environment, Damage to Equipment, Human factors: competency, training, fitness, fatigue, etc.

STEP 3 Develop Risk Elimination or Reduction Measures:

Elimination or substitution of the process/substance.

Engineering controls: Guards, rails, mechanical aids.

Administration controls: Reducing exposure time, number of employees.

Personal Protective Equipment (PPE).

STEP 4 Review and Update the JSA Periodically

Review of the JSA should occur when:

- a. The task is complete.
- b. The method of performing the task changes.
- c. Further hazards are identified.
- d. The task is undertaken again.

JOB SAFETY ANALYSIS

page _____ of _____

Location

Job

Date

Basic Job Steps

Potential Hazards / Injuries

Safe Job Procedures

HazCom*

Hazard Communication Program*

As part of Rogers Group's continuing efforts to prevent injuries and protect the health of RGI employees, this program has been prepared to identify, communicate, and train employees, contractors and visitors about the hazardous chemicals used, stored, and/or produced by Rogers Group, Inc.

1. Hazard Determination

- a. Hazardous chemicals are defined as any element, chemical compound or mixture of elements and/or compounds that may pose a health or physical hazard.
- b. A list of the chemical compounds present at each location is available. This list can be cross-referenced against the chemical's label and material safety data sheets on file to obtain additional information about the specific chemical or mixture.

2. Material Safety Data Sheets (MSDS)

- a. Under federal guidelines, manufacturers and suppliers must label hazardous products and include with the initial shipments the Material Safety Data Sheets (MSDS) that give complete information about the products. Information on the sheets will include among other items, the product name, its chemical name and family, a 24-hour emergency assistance phone number, ingredients, emergency and first aid procedures and hazard and protection data for employees and the environment.
- b. Rogers Group will rely on the MSDS from manufacturers and suppliers for the necessary information about products we use. The MSDS will be kept in special binders; copies of the MSDS will be readily available at the work site for employees who may use or come in contact with hazardous substances.
- c. Authorized purchasing agents and/or local supervisors will be responsible for ensuring receipt of the MSDS.
- d. If the first shipment of a hazardous material arrives at a Rogers location or worksite without the necessary MSDS, the most immediate supervisor controlling the substance must obtain the MSDS before the product is used. This is to ensure that health and safety precautions will be met. The supervisor should get the MSDS through the supplier.
- e. Any changes in a product that affects the safety and health considerations will be noted by the manufacturer's revised MSDS. This new information will be filed in the MSDS binder and presented to employees.
- f. The MSDS on discontinued products will remain in the MSDS binder for at least six months and employees will be notified at

least three months prior to their removal from the MSDS binder. After that, they should be kept on file.

- g. This program, the list of chemicals, the MSDS binder, and training file will be maintained at user operation locations and will be readily available to all employees who may use or come into contact with hazardous substances during the performance of their duties. The material will also be available to employee representatives, MSHA, OSHA, and National Institute of Occupational Safety and Health (NIOSH) personnel.
- h. Rogers Group, Inc. will prepare an MSDS for any hazardous material produced by the company and will update it with significant, new information about the materials' hazards or protective measures within 3 months of becoming aware of this information.

3. Labeling

- a. Supervisors are responsible for making sure that all products are marked with appropriate labels, tags or markings when received. Supervisors shall immediately replace any missing or defaced labels.
- b. Labels or other markings will include the identity of the product with the corresponding identity name of the MSDS and name on the chemical list, appropriate hazard warnings and the name and address of the manufacturer, importer or other responsible party. Labeling will be updated as deemed necessary by the manufacturer.
- c. If hazardous products are transferred into approved types of smaller containers, these smaller containers will also require appropriate labeling and marking. However, hazardous products that are transferred into portable containers, and which are intended for immediate use by the employee who made the transfer, do not need to be labeled.
- d. Rogers Group, Inc. will prepare a label for any hazardous material produced by the company and will update it with significant, new information about the materials' hazards or protective measures within 3 months of becoming aware of this information.

4. Employee Information and Training

- a. After each employee is hired, when their work assignments change or when a new hazard is introduced into their work area, he or she will be given adequate training in the use of hazardous materials. Training will include at least the following:
 - i. An explanation of how to read Material Safety Data Sheets(MSDS).
 - ii. An explanation of how to read and use labels.
 - iii. Any physical or health hazards associated with the hazardous chemical(s).

- iv. Proper precautions for handling to prevent or minimize exposure to the hazardous chemical(s).
 - v. Emergency procedures for spills, fires, disposal and first aid.
 - vi. The methods and observations that will be used to detect the presence of a hazardous substance in the workplace.
 - vii. The right of employees, their representatives, or medical professionals to receive information about the hazardous chemicals to which they may be exposed.
- b. Records will be kept of all such training and will include the date of the training, subject covered and signatures of all employees in attendance. These reports will be filed in the MSDS binder.
 - c. Employees will also be informed of any changes on the MSDS for products being used, particularly when the change affects personal protective equipment and the handling or use of the product.
 - d. The instructing supervisor will determine the format of the training session, and it may include lectures, discussion, movies, slides, booklets, MSDS, or whatever else is appropriate for effective training. Oral or written tests may be given to evaluate the effectiveness of the training.
 - e. The supervisor in charge will determine what site specific or non-routine task training is required. They will use manufacturer supplied MSDS where the potential for overexposure exists. Sampling by approved industrial hygiene techniques will be accomplished to determine exact exposure.
 - f. Sampled exposure will be related to Threshold Limit Values (TLV's), existing regulatory standards and other relevant data for appropriate corrective responses, emergency procedures and protective measures.
 - g. Special training procedures for site-specific hazardous products use will be developed and added to this program as an addendum.

5. Personal Protective Equipment

- a. Supervisors, working with the Safety Office, will determine what personal protective equipment will be needed, based on evaluation of the hazard and the MSDS information.
- b. Supervisors will instruct employees on these conditions:
 - 1) What hazards the equipment protects against
 - 2) When and how to wear the equipment
 - 3) How to store the equipment and when it needs to be replaced.
- c. Supervisors will regularly inspect personal protective equipment for defects and will enforce the use of the equipment.

6. Engineering Requirements

When products present unusual hazards or special problems in ventilation, protective equipment or special use procedures, the use of substitute products will be considered. If no substitutes are available, the engineering, safety, and manufacturer's representatives will be consulted to ensure that all safety precautions are met.

7. On-site Contractors

Contractor personnel who may be on site and exposed to hazardous products shall be warned of such exposures by the supervisor in charge or his designated representative. Appropriate safeguards will be provided to those personnel.

8. Retail Sales

The MSDS for products manufactured or distributed by RGI and its affiliates will be provided to purchasers on request.

ROGERS GROUP, INC. AND AFFILIATES
Energy Lockout Plan

This plan is designed to establish a lockout and tagout procedure to prevent the unintended release of stored energy that may energize a machine or equipment causing injury.

The Rogers Group, Inc. _____ facility has declared the Location Manager as being responsible for implementing this plan.

The following sources of energy have been identified:

1. _____
2. _____
3. _____
4. _____
5. _____

A supply of padlocks and multiple lock devices are available for employees' use. When the lockout devices are not in use, they will be kept readily available and not used for other purposes. Tags will also be available to identify the user of the lockout device. Chocks, blocks, cribbing material, chains and wire ropes, pins and other suitable means of securing items in place will be used as conditions dictate.

Training

Employee training and education will be accomplished during the new hire process, as well as being a specific topic during the Annual Refresher Training. Site-specific training will be given where necessary.

Procedures

1. Prior to any work activity, turn off and disconnect all sources of energy.
2. Place the lockout device at the energy disconnect point.
3. Identify any other sources of energy and potential hazards in front or behind the working area.
4. Attempt to start.
5. Safely release any stored or residual energy such as capacitors, springs, hydraulic systems, air, gas, steam, water pressure, gravity, etc. If not released, it must be safely controlled, restrained or rendered safe by methods such as grounding, repositioning, blocking, etc.
6. If more than one person is working on the machine/equipment locked out, then ALL employees must install their own lockout device.
7. When work activity is complete, each individual who placed a lockout device on the power source must remove his or her own lockout device.
8. Supervisors can modify, revise, and/or add to the procedures when condition dictate at no compromise to safety.

ROGERS GROUP, INC. AND AFFILIATES
Exposure Control Plan

These procedures have been developed for Rogers Group, Inc. and Affiliates for the purpose of providing procedures and precautions to protect employees from potentially infectious incidents.

Rogers Group, Inc. does not have employees specifically assigned to offer medical attention to injured employees. First Aid Training is covered during Annual Refresher Training sessions, and, in some instances, site specific First Aid Training Classes are held for interested employees. Additionally, Supervisors and other Management Personnel are trained and qualified to administer First Aid. Certain locations have employees who have voluntarily completed Advanced First Aid Training (i.e., First Responder, EMT, etc.).

Has the following employees trained.

1. _____
2. _____
3. _____
4. _____
5. _____

Each employee at this facility has been given instructions that cover the concerns of being exposed to potentially infectious materials. The potential exposure that exists to the employees is after a personal injury accident has occurred, and body fluids are present. Trained personnel may administer First Aid to an injured employee while waiting for ambulance and rescue personnel to arrive. If the injured does not require an ambulance, the employee will be taken to the medical treatment facility. This plan outlines the precautions that are to be taken should such an incident occur.

In the event of a personal injury at the work site the following emergency procedures will apply, in addition to the normal steps taken to deal with any other type incident.

1. Only trained personnel are permitted to treat personal injuries.
2. Each First Aid Kit will contain additional personal protective equipment such as disposable gloves, one-way respiration valves, mask, shield, and anti-septic wipes.

3. Soiled bandages and other materials will be disposed of at the hospital or clinic where the injured is transported or another approved manner.
4. First Aid personnel will immediately wash up after treatment is completed with soap and water, and change clothes if necessary.
5. First Aid personnel, if exposed, will also be examined by the Doctor for advice in the prevention of potential exposure to infectious diseases.

Other personal protective equipment is available at the work sites and will be used at the discretion of the First Aid person.

RESPIRATORY PROTECTION PROGRAM

Rogers Group, Inc. recognizes the potential exposure to airborne contaminants that employees face at their work sites. This plan is a guide to assist each location to identify the airborne contaminants that employees face as well as the appropriate respiratory protection.

I. HAZARD IDENTIFICATION AND SELECTION OF RESPIRATORY PROTECTION

- A. Rogers Group, Inc. will conduct periodic air monitoring to identify and measure respirable hazards to our employees.**
- B. In order to maintain employee exposures to airborne contaminants below the permissible exposure levels, Rogers Group, Inc. uses the following control methods.
1. All dust suppression equipment will be maintained at full operating effectiveness and will be functioning at all times while the processing plant is in operation.
 2. All roadways will be wetted or cleaned to ensure proper suppression of airborne dust generated by traffic.
 3. All mobile equipment will be equipped with filtered air systems. Mobile equipment will be operated with cab doors and windows closed at all times. If mobile equipment is not equipped with a cab and filtered air system, administrative controls will be used in conjunction with respiratory protection to reduce the operators' exposures. All cabs of mobile equipment will be vacuumed or washed down every fifty hours of operation.
 4. All plant control booths, where feasible, will be equipped with filtered air systems. The doors and windows of the control booths are to remain closed at all times. All control booths will be vacuumed or washed down every fifty hours of plant operation.
 5. When conditions may create respirable dust exposure to employees above the permissible exposure limit, location management with the safety and health department will determine appropriate PPE to reduce exposure at or below the Permissible Exposure Limit and mandate their use.
 6. Mechanical screening equipment in all material testing labs will be equipped with dust containment/exhaust enclosures.
 7. Chest X-rays and PFT's will be performed on newly hired employees and thereafter will be offered to employees with over-exposures to respirable hazards to provide early detection of any lung conditions that could evolve into a lung disease.

- C. In the event that an employee's exposure to a respirable hazard is above the permissible exposure limit, Rogers will select respiratory protection for that employee based on the following
1. The respirable hazard to which the employee is exposed.
 2. Factors affecting the respiratory protection's performance and reliability.
 3. All applicable regulations.

II. MEDICAL LIMITATIONS

Employees physically unable to use respiratory protection equipment while performing assigned work shall have their work assignments reviewed to protect their health.

III. RESPIRATOR USE AND LIMITATIONS

- A. All employees required to use a respirator will be fit tested prior to use. Fit tests shall be administered using the appropriate regulatory agencies' protocols.**
- B. As with all safety equipment, respirators only work when used consistently and correctly. In order to ensure all employees are protected against respirable contaminants the following guidelines shall be followed:
1. Use respiratory protection as trained and instructed.
 2. When using a respirator, make sure that no conditions, such as facial hair, interfere with face piece-to-face seal or valve function.
 3. When using a respirator, make sure that glasses, goggles, or other protective equipment do not interfere with face piece-to-face seal or valve function.
 4. When using a respirator, perform seal checks prior to each use.
 5. Report any conditions that could affect your respirator's effectiveness to your supervisor immediately.
 6. Maintain and store your respirator properly.

IV. RESPIRATOR MAINTENANCE AND STORAGE

- A. Respirators will be cleaned and disinfected on a regular basis
1. Respirators issued exclusively to one employee will be cleaned and disinfected at least after each day's use or more often if necessary. Respirators used by more than one employee will be cleaned and disinfected after each use. The following procedure is recommended for cleaning and disinfecting respirators:
 1. Remove and discard all used filters, cartridges, or canisters.
 2. Wash face piece and breathing tube in a cleaner-disinfectant solution. A hand brush may be used to remove dirt. Solvents, which can affect rubber and other parts, shall not be used.
 3. Rinse completely in clean, warm water.
 4. Air-dry in a clean area in such a way as to prevent distortion.
 5. Clean other respirator parts as recommended by the manufacturer.
 6. Inspect valves, head straps, and other parts to ensure proper working condition.
 7. Reassemble respirator and replace any defective parts.
 8. Place in a clean, dry plastic bag or other suitable container for storage after each cleaning and disinfecting.
- B. Employees will inspect their respirator for defects before and after each use. Emergency respirators will be inspected monthly and after each use. Escape only respirators will be inspected prior to being transported to a site for possible use. Supervisors should be made aware of defective equipment immediately.
- C. Respirators shall be stored to protect them from damage and deformity. Store respirators in designated areas. Respirators are not to be stored in lockers, toolboxes, or vehicles unless they are in a carrying case or carton.

1

Disposable respirators will never be used by more than one employee and will be changed and disposed of at the end of each work shift or more often if necessary.

V. PROGRAM EVALUATION

The Respiratory Protection Program will be regularly evaluated to ensure the continued effectiveness of the program and its compliance with applicable regulations. The evaluation will include work area surveillance, supervisor observation, and employee feedback.

VI. PROGRAM ADMINISTRATION

The supervisor in charge will administer this program or assign a competent direct report to administer the Respiratory Protection program for his/her location.

VII. TRAINING AND EDUCATION

Training provides employees the opportunity to become familiar with respiratory protection, to be instructed in its use, to have respirators fitted properly, and to test the seal of respirators.

- A. Training shall include both classroom and field instruction and shall cover the following:
 - 1. The nature of the hazard and the health effects if a respirator is not worn.
 - 2. All efforts being made to reduce employee's exposure to the respirable hazard.
 - 3. The reason that the respiratory protection provided is proper for the employee's particular situation.
 - 4. The capabilities and limitations of the respiratory protection provided.
 - 5. Instruction in the proper use of the respiratory protection provided.
 - 6. Emergency situations – how to recognize and cope with them.
 - 7. Special use situations
- B. Refresher training will be provided annually.

**ROGERS GROUP, INC. AGGREGATE FACILITIES
RESPIRABLE DUST PROTECTION PLAN
Revised 8-1-04**

Rogers Group, Inc. is committed to protecting the health of its employees by maintaining employee exposures to respirable dust below the permissible exposure limits. The following action plan will be followed at all Rogers Group aggregate facilities at all times.

1. All dust suppression equipment will be maintained at full operating effectiveness and will be functioning at all times while the processing plant is in operation.
2. All roadways will be wetted or cleaned to ensure proper suppression of airborne dust generated by traffic.
3. All mobile equipment will be equipped with filtered air systems. Mobile equipment will be operated with cab doors and windows closed at all times. If mobile equipment is not equipped with a cab and filtered air system, administrative controls will be used in conjunction with respiratory protection to reduce the operators' exposures. All cabs of mobile equipment will be vacuumed or washed down every fifty hours of operation.
4. All plant control booths will be equipped with filtered air systems. The doors and windows of all control booths are to remain closed at all times, while the plant is in operation. All control booths will be vacuumed or washed down every fifty hours of plant operation.
5. When conditions may create respirable dust exposure to employees above the permissible exposure limit, location management with the safety and health department will determine appropriate PPE to reduce exposure at or below the Permissible Exposure Limit and mandate their use.
6. Silica containing materials will be identified at each operation and employees will be educated in the associated hazards.
7. Mechanical screening equipment in all material testing labs will be equipped with dust containment/exhaust enclosures.

8. Chest X-rays and PFT's will be performed on newly hired employees and thereafter will be offered to employees with over-exposures to respirable hazards to provide early detection of any lung conditions that could evolve into a lung disease.
9. Employees will be trained, at least annually, about the health effects of respirable dust, the controls that Rogers uses to reduce their exposure, the importance of maintenance and good housekeeping, and on the proper types and uses of respiratory protection available.
10. Rogers Group, Inc. will continue to monitor and test respirable dust at RGI work sites to ensure employee exposures to respirable dust are maintained at or below the permissible exposure limits.

HEARING CONSERVATION PROGRAM

Hearing loss is a permanent condition caused by irreversible damage to the tissue of the inner ear. Noise-induced hearing loss primarily affects a person's speech recognition. Rogers Group, Inc. works diligently to prevent occupational hearing loss. This Occupational Hearing Conservation program is meant as a guide to all managers, supervisors, and employees of RGI.

I. EXPOSURE MONITORING AND MINER NOTIFICATION

- A. Rogers Group, Inc. will establish a system of noise level monitoring that evaluates each employee's noise exposure sufficiently to determine continuing regulatory compliance. Employees and/or their representatives are free to observe the required noise exposure monitoring.
- B. Rogers will notify employees of the following:
 - 1. An eight-hour, time-weighted, average exposure equal to or exceeding the action level (85dBA).
 - 2. Corrective action(s) being taken.

II. OPERATOR-PROVIDED HEARING PROTECTION

A. Management shall:

- 1. Enroll all employees whose noise exposure equals or exceeds the action level into the company hearing conservation program.
- 2. Provide hearing protection to an employee whose noise exposure equals or exceeds the action level.
- 3. Allow an employee to choose hearing protection from at least two muff types and two plug types (employees requiring dual protection will choose one of each type).
- 4. Ensure that hearing protection is in good condition, properly fitted and maintained in accordance with the manufacturer's instructions.
- 5. Allow the employee to choose different hearing protection if wearing the previously selected protection is later precluded due to medical pathology of the ear.
- 6. Train the employee.

B. Employees shall:

1. Wear the provided hearing protection whenever their eight-hour, time-weighted, average noise exposure meets or exceeds 85dBA.
2. Wear dual hearing protection when their eight-hour, time-weighted, average exposure exceeds 105dBA.

III. AUDIOMETRIC TESTING

Management shall offer audiometric tests, at no cost to the employee, within 6 months of enrolling an employee into the Hearing Conservation Program in order to establish a Baseline Audiogram.

- A. Subsequent audiograms will be offered to all employees enrolled in the HCP at intervals not exceeding 12 months.
- B. Rogers will revise the baseline audiogram if one of the following occurs:
 1. An employee is away from work for more than 6 months.
 2. A physician or audiologist determines that a standard threshold shift is permanent.
 3. A physician or audiologist determines that the annual audiogram indicates a significant improvement over the baseline audiogram.
- C. Rogers Group, Inc. will notify an employee of:
 1. The results and interpretation of the audiometric test, including any finding of a standard threshold shift or reportable hearing loss.
 2. The need and reasons for any further testing or evaluation.

IV. TRAINING

- A. Upon being enrolled into the Hearing Conservation Program, employees will be provided training to include:
 1. The effects of noise on hearing.
 2. The purpose and value of wearing hearing protection.
 3. The various types of hearing protection offered by Rogers Group, Inc. and the care, fitting, and use of each type.
 4. The advantages and disadvantages of the hearing protection offered.
 5. General regulatory requirements.
 6. The respective tasks in maintaining noise controls.
 7. The purpose, value, and summary of audiometric testing and procedures.

- B. Retraining will be provided within 30 days of confirmation of a work-related standard threshold shift.
- C. Refresher training will be provided at intervals not exceeding 12 months.

V. RECORDKEEPING

- A. Rogers Group, Inc. will maintain the following records related to the Hearing Conservation Program.
 - 1. Notifications of noise exposures equal to or above the action level and corrective actions to be taken.
 - 2. Audiometric test records.
 - 3. Notifications of an audiogram that indicates a standard threshold shift, a reportable hearing loss, and/or need for further testing.
 - 4. The employee's most recent training certification, including date and type of training given (where required).
- B. RGI will make these records available to authorized regulatory agencies and affected employees.

ROGERS GROUP, INC.
EMPLOYEE ASSISTANCE PROGRAM POLICY

Revised October 27, 1998

I. POLICY STATEMENT

- A. Rogers Group, Inc., recognizes that there are times when personal problems affect an employee's well-being and job performance. A confidential Employee Assistance Program (EAP), sponsored and paid for by Rogers Group, is now available to employees and their dependents. Services under this program are coordinated by an EAP provider selected by the company.
- B. This program provides professional and confidential assistance for most personal problems. Typical problems, which can be addressed through the EAP, include stress, marital, family/child, alcohol and drug abuse, and psychological and financial problems.
- C. All counseling through the EAP is on a voluntary basis even if recommended to the employee by management. Participation in counseling does not relieve the employee of his or her responsibility to meet accepted job performance and attendance standards.
- D. Information regarding any employee utilizing the services will be held in strictest confidence by the EAP counseling service. No information will be released to Rogers Group, or any other person affiliated with Rogers Group, regarding an employee's problem or any plan of action devised to deal with the problem without written authorization from the employee.

II. DEFINITION

To ensure confidential assistance is provided to Rogers Group employees and their dependents, the following steps should be taken:

A. Self-Referral

- 1) The employee or any member of his or her household can call 1-800-447-7731 and press number 5 to schedule an appointment with an Employee Assistance Representative.
- 2) The EAP provider will arrange an appointment for the individual with a local Employee Assistance Representative. The EAP also offers emergency assistance on a 24-hour basis. The Hot Line number is 1-800-447-7731, and press number 5.

B. Management Referral

- 1) Management referral to the Employee Assistance Program is based on:
 - a) A request by the employee for assistance with a personal problem
 - b) A pattern of decline in an employee's work performance
 - c) A particular on-the-job incident which indicates the possible presence of a personal problem.
- 2) When an employee seeks advice regarding a personal problem, it is the responsibility of the manager or supervisor to suggest the employee use the professional counseling services that are available through the EAP and offer to assist the employee in arranging for an appointment with the Employee Assistance Program counselor.
- 3) When an employee's performance is the basis for a referral to the EAP, the manager or supervisor should prepare a written account of the performance problem which has been observed. This account should be as detailed as possible including the dates, times, and description of the behavior which has become a part of a pattern of decline, or a particular incident which warrants managerial action. This documentation is for the supervisor's use in talking with the employee.
- 4) Before meeting with the employee the manager should consult their Human Resources Field Representative to determine if the EAP referral is an appropriate action.
- 5) If an EAP referral is indicated, based on the above information, the manager or supervisor should call the EAP provider and ask to speak with a counselor. The counselor will review the performance problem with the supervisor or manager and assist in preparing for a meeting with the employee.
- 6) The manager or supervisor should then have a meeting with the employee to discuss the performance problem and communicate as clearly as possible the consequences of failure to resolve the problem. This meeting should focus solely on defining the work performance and/or attendance problems...not on any possible personal causes.
- 7) After the employee has been confronted with the performance problem, the manager or supervisor should review the EAP guidelines with the employee, advise him or her of the availability of confidential, professional assistance for any work-hampering personal problem,

and strongly encourage the employee to allow the manager or supervisor to arrange an appointment with an Employee Assistance Counselor. Although the final decision to use the program is made by the employee, management should emphasize the advantage of the Employee Assistance Program.

- 8) If the employee agrees to accept assistance, the manager or supervisor should assist the employee in arranging a meeting between the employee and the EAP counselor.
- 9) Information concerning the nature of the employee's problem will not be disclosed to anyone without a signed release from the employee. The manager making the referral will be told only whether the employee is working toward a plan to resolve the personal situation and if appointments are being kept.
- 10) An employee may choose to decline assistance through the EAP; participation is entirely voluntary. However, the employee remains responsible for acceptable job performance.

C. Family Member Assistance

1. Any member of an employee's immediate family (benefit eligible dependents and household members) also may use the Employee Assistance Program.
2. The Employee Assistance Program counselor will arrange a confidential consultation in a counselor's office for the individual or will provide the necessary assistance on the telephone.
3. Any communication between the individual and the EAP counselor will be held in strictest confidence.

D. Time Off for Counseling

Any time off from work to attend a counseling session is treated the same as other absences due to personal illness, injury, or medical appointments.

E. Waiting Period

There is no waiting period for initial consultation and short-term counseling. The waiting period for long-term counseling or rehabilitation is six (6) months from the date of hire.

F. Payment of Benefits

1. Initial consultation and short-term counseling is paid for by Rogers Group, Inc., with no cost to the employee.
2. After the waiting period, Rogers will share the cost of long-term treatment with employees and their eligible dependents. Charges will be paid according to the medical plan provisions applicable to such employees and dependents.

G. Changes to or Termination of Coverage

Coverage under the EAP will be terminated on the last day of employment.

III. RESPONSIBILITY

The Human Resources Department of the Corporation is responsible for the administration of this policy.

IV. CHANGES TO OR TERMINATION OF POLICY

This plan may be changed or terminated at any time at the discretion of the Board of Directors of the Corporation without notice to any employee.

**ROGERS GROUP, INC. and AFFILIATES
SUBSTANCE ABUSE POLICY & PROCEDURES**

August 2007

I. POLICY STATEMENT

A. Objective

1. To create a work force free from substance abuse, a safe and healthy work environment and protection of the general public.
2. To maximize attendance, productivity and quality work.
3. To comply with the contractual obligations of customers, the regulatory requirements of federal and state agencies (such as D.O.D., D.O.T., D.O.E.) and to satisfy the requirements of drug abuse legislation such as the Drug Free Workplace Act of 1988.
4. To protect Company and employee property.
5. To protect the reputation of the Company within the community.

B. Illegal Drugs and Alcohol Impairment -- Rogers Group, Incorporated and its affiliates (the "Company") are committed to providing a safe and healthy working environment which includes a work force free of illegal drugs and alcohol impairment and their negative influence on our work environment. The possession, sale, or use of illegal drugs or being impaired by alcohol, or the use of unauthorized alcoholic beverages on or in Company property, or at Company sponsored events is prohibited! This policy applies to all employees, and to others as defined in this policy, during working hours or on or in Company property and at Company sponsored events at any time. This policy also prohibits the possession of drug paraphernalia or unauthorized alcoholic beverages on or in Company property or at Company sponsored events.

C. Prescription Drugs -- Prescription drugs may be taken only under the direction of and personal prescription by a physician. It is the responsibility of the employee to discuss with the prescribing physician and understand the potential side effects of medication. Any potential impairment of the safe and efficient performance of assigned duties caused by the medication must be discussed with supervision **prior** to beginning work.

D. Employee Assistance Programs -- **Employees having a drug or alcohol problem are strongly encouraged to seek assistance through the Employee Assistance Program**

(EAP). Eligibility for the EAP is governed by the EAP Policy. This program provides professional and confidential counseling to address personal problems such as substance abuse.

An employee who self identifies as a substance abuser to his or her supervisor will be referred to the EAP and required to complete the prescribed program. The employee will also be tested, and if testing positive, be required to remain off work without pay until testing negative. The employee must test negative within the time periods specified below or be disciplined per Section II.F. of this policy. The employee must also comply with the re-employment requirements of Section II.H of this policy.

The specified time periods (total elapsed time from first EAP contact) allowed for EAP counseling before an employee must test negative are as follows:

1. Marijuana -- six (6) calendar weeks.
2. All other illegal drugs -- two (2) calendar weeks.
3. Alcohol -- twenty-four (24) hours.

An employee who is voluntarily and confidentially complying with an EAP directed program for substance abuse prior to testing but has not self identified, if testing positive, will be disciplined per Section II.F. of this policy.

II. PROCEDURE

A. Applicable Parties and Definition of Company Property

1. This policy applies to all full-time, part-time, commissioned, probationary, casual, temporary or contract employees.
2. This policy further applies to applicants for employment, subcontractors performing work for the Company, and visitors on Company property.
3. This policy is in effect and will be enforced on all Company property or any other properties or job sites under control of the Company including Company sponsored events.

- B. Enforcement:** The Company will enforce this policy through testing for illegal and prescription drug use and/or alcohol impairment and through searches.

C. Testing

1. For any questions prior to sending an employee for testing, the supervisor shall contact Connie Edwards (615-780-5710) in the Human Resources Department for the latest procedures and test site coordination. Only testing facilities approved by the Company and proper chain of custody procedures will be used.
2. Testing for illegal and prescription drugs will be by urine sample analysis at standards that are attached as Appendix A. The test levels for alcohol impairment are:
 - a. A blood alcohol level of 0.08%.
 - b. A QED saliva alcohol level of 0.08% requires an immediate blood alcohol or breath test.
3. Employees are subject to testing for illegal and prescription drugs and/or alcohol impairment in the following situations:
 - a. As a condition of employment. Every new employee must be tested prior to beginning work; but may, after testing, begin urgent work while waiting for test results.
 - b. Prior to returning from temporary, seasonal layoff.
 - c. Following an injury incident as defined in the Rogers Group, Inc. Safety Policy.
 - d. When an employee's supervisor has suspicion that the employee is using or under the influence of drugs or alcohol.
 - e. At any time for a period of twelve (12) months following counseling or rehabilitation for a substance abuse problem
 - f. Prior to return to work following a medical related absence of 120 calendar days or more.
 - g. Company physicals.
 - h. Testing specified by law (such as D.O.T., Police, etc.) or contractual obligation (such as D.O.D. or D.O.E.). This Substance Abuse Policy and Procedures may also be applied and acted upon in conjunction with any test required by law, or contractual obligation. Unless contractual standards are more stringent, Company standards will apply for this policy.
 - i. Testing of employees at any time.
 - j. Any "at fault" damage to a company fleet vehicle that will require repair or replacement of the damaged area or part.
 - k. Property damage incidents where safety precautions or rules were violated.
4. Resignation after the announcement of a substance abuse test, or resignation after being tested for substance abuse, will preclude re-hire consideration for a period of sixty (60) calendar

days. Re-hires under this section will be subject to testing at anytime for a period of twelve (12) months after re-hire.

5. Part-time, probationary, casual, temporary, contract employees, subcontractors, vendors, and visitors, on Company property or on a Company work site, that are contemplated to be on duty for the Company for a period of two continuous weeks or more, or following an injury incident (Section II.C.3.c.), or are required by law or contract, are subject to testing for illegal drugs and/or alcohol impairment. Management should notify all such companies or persons by contract, purchase order or in writing of this policy including disciplinary action.

D. Searches

All persons, property and areas on Company property are subject to search. This includes an individual entering or leaving Company property and all areas, equipment, personal work space and storage facilities including but not limited to desks, lunch and tool boxes, lockers, storage bins, brief cases, bags, purses, etc. All vehicles entering, operating or parked on Company property are subject to search. Company vehicles are always subject to search regardless of where they are located.

E. Definitions of a Positive Test Result

1. Test results reporting higher than the levels defined within this policy.
2. A donor providing two (2) "negative dilute" test results for the same testing period.
3. A donor refusing to submit to an observed collection as requested at any time by the employer and/or clinic.
4. A donor refusing to provide a specimen of sufficient amount and/or temperature.
5. A test result indicating a prescription drug in which the employee does not possess a personal prescription in his/her name.

F. Disciplinary Action

1. A positive test result for illegal and/or prescription drugs or alcohol impairment according to testing levels defined in this policy, or for refusal to follow applicable provisions of this policy, if a first time offense after the first 180 days of employment, will result in a fifteen (15) business-day suspension without pay. If prior to the first 180 days of employment the employee will be terminated, and if in otherwise good standing, allowed to reapply after sixty (60) calendar days.

2. The following situations will result in immediate discharge:
 - a. Possession, use or sale of illegal drugs or possession of drug paraphernalia or possession, use or sale of unauthorized alcohol on or in Company property or at Company sponsored events.
 - b. Refusal to submit to testing for illegal drugs or alcohol impairment, or to submit to a search of the workplace or company property; and/or refusal to submit to testing or searches as requested by regulating authorities i.e. police agencies, DOT, DOE, etc.
 - c. Second offense after rehire/retention resulting from applicable provisions of this policy.
 - d. A new employee testing positive, or having two test results reported as "negative dilute", as part of the employment process will not be hired but may reapply after a sixty (60) calendar day waiting period.
 3. Discipline for the misuse of prescription drugs may include immediate discharge. Discipline for altering the urine sample given may also result in immediate discharge under the Safety and/or Discipline Policies. Employees disciplined but retained for employment, will be subject to substance abuse testing at any time for a period of (12) months.
 4. Non-employees violating this policy will be denied further access to Company property for a period of sixty (60) calendar days.
 5. Employees violating other company policies/rules, while also violating this Substance Abuse Policy, may be subject to more severe discipline than outlined in this Policy.
- G. Drug-Free Workplace Act Requirement: Employees must, as a condition of employment, abide by the terms of this policy and the above act, and report any conviction under a criminal drug statute for violations occurring in the workplace. A report of a conviction must be made to local supervision within five (5) calendar days of the conviction.
- H. Re-employment: An employee who was disciplined or discharged for a first offense under this policy, and is retained or rehired, will be required to complete a substance abuse counseling program through the EAP. The employee will be required to sign a release authorizing the company to consult with the EAP provider to verify required program participation and completion. Employees will receive written notification of this, and other return to work requirements. The initial face to face meeting with a Substance Abuse Counselor must occur within ten (10) business days of receipt of the letter. Should the counselor not release the

employee to return to work at the end of the suspension period, the additional time off will continue to be without pay. The employee must test negative and will be subject to testing at any time for substance abuse with a minimum of six (6) times in the first twelve (12) months from rehire date. Failure to meet any of these requirements will result in termination.

- I. Future employment: Any employee who tests positive a second time for either illegal drugs or alcohol impairment, is permanently barred from future employment. This provision also applies to any employee who has twice refused to be tested.
- J. Authorization of alcoholic beverages: A Company Officer, Vice President or higher, or Strategic Business Unit Manager may authorize the use of alcoholic beverages on Company property or at a Company sponsored event.

III. RESPONSIBILITY

The administration and enforcement of this policy is the responsibility of **every supervisor**. The Safety and Environmental Services and the Human Resources Departments will provide process, monitoring, reporting and other assistance. To maintain the confidentiality of records, only these departments will maintain testing, counseling or rehabilitation records in locked files separate from the personnel files. Information will be disseminated to others only on a need-to-know basis or to defend the Company from challenges as legally required.

IV. CHANGES TO OR TERMINATION OF POLICY

This policy may be changed or terminated at any time at the discretion of the Chief Executive Officer of the Rogers Group, Inc. and its affiliated companies, without notice to any employee.

Appendix A to Rogers Group Substance Abuse Policy & Procedures

ROGERS GROUP, INC. LOW-TOLERANCE DRUG TESTING STANDARDS

IF OUR TESTING MISSES DRUG USE, OUR PROGRAM IS NOT WORKING.

High tolerance testing methods identify “problem” individuals who have chronic or heavy drug use habits. However, these methods often miss detecting up to 80% of drug use (casual, recreational, experimental). For those who hold to the philosophy that any and all drug use is a “problem”, Low-Tolerance Drug Testing does a significantly better job of detecting drug use.

In addition to screening and confirming at lower levels, Low-Tolerance methods test for a wider range of drugs and are less affected by most sample adulteration techniques attempted by drug users to get around testing.

Testing Levels

<i>Screening Thresholds (ng/mL)</i>	<u>Tolerance</u>
Amphetamines/Methamphetamines	300
Barbiturates	200
Benzodiazepines	200
Cannabinoids (marijuana)	20
Cocaine	100
Methadone	300
Opiates	200
Oxycodone	200
PCP	20
 <i>GC/MS Confirmation Thresholds (ng/mL)</i>	
Amphetamines/Methamphetamines	100
Barbiturates	100
Benzodiazepines	100
Cannabinoids (marijuana)	5
Cocaine	50
Methadone	200
Opiates	100
Oxycodone	100
PCP	10

Organizations with a philosophy of Low-Tolerance for drug use:

- Professional and amateur athletics

- High profile or safety sensitive companies
- Courts, parole and probation offices
- Police and fire departments
- The military
- Treatment centers
- Concerned parents

Low-Tolerance methods are fully forensic and court acceptable.

ROGERS GROUP AND AFFILIATES LICENSED VEHICLE SAFETY POLICY

POLICY STATEMENT

This Licensed Vehicle Safety Policy applies to all employees and other drivers ("Drivers") authorized to drive a Company Vehicle. Rogers Group (the "Company") promotes the safety of its employees and maintains policies dedicated to eliminating conditions that adversely affect the safety of our employees and otherwise threaten our corporate assets through accidental losses.

DEFINITIONS

Company Vehicle: Any motor vehicle owned, leased or rented by the Company and licensed as a public highway use vehicle.

Drivers: All Company employees authorized to drive a Company Vehicle (whether said employees are assigned a vehicle for long-term use or drive a Company Vehicle only occasionally), and certain non-employees limited to the employee's spouse and/or dependents. Dependents other than spouses may only drive a Company Vehicle if accompanied by the RGI employee assigned to that vehicle. Drivers must:

- 1) Possess a valid driver's license;
- 2) Be in good health and be physically and mentally able to drive safely;
- 3) Have authorized the Company in writing (if they are an employee) to obtain initial and periodic driving records;
- 4) Possess a favorable driving record, as determined by the Company;
- 5) Operate a Company Vehicle in conformity with all traffic laws, signals and markings, and with appropriate consideration given to adverse weather and traffic conditions;
- 6) Wear seat belts while driving or as passengers in all company vehicles. Employees will also require non-employees to wear seat belts while in company vehicles;
- 7) Operate all licensed trucks that have a one (1) Ton rating (i.e. F-350) or greater with the headlights on at all times while operating on public roadways;
- 8) Follow all the requirements of this Licensed Vehicle Safety Policy.

Full Personal Use: Full Personal Use of a Company Vehicle is permitted for all Drivers unless specifically restricted to Limited Personal Use.

Limited Personal Use: Employees at or below the Aggregate Foreman or Quality Technician level are restricted to using a

Company Vehicle for travel from the employee's home to the Rogers Group location at which they are working.

Reportable Event: Any occurrence involving a Company Vehicle resulting in a legal citation, damage to any vehicle or other property damage. Any occurrence involving serious injury or death must be reported within 2 hours to Risk Management and the employee's supervisor. All other occurrences must be reported within 24 hours from the time of the event by the Driver to Risk Management and the employee's supervisor, with basic information on the incident (except for the accident investigation) entered into the HRIS system. This requirement includes reporting a conviction for a moving violation in a company vehicle to the employee's supervisor within 24 hours.

The employee's supervisor is responsible for ensuring an incident investigation is conducted as requested by the Legal Department.

RESPONSIBILITIES:

DRIVERS:

Drivers are required to conform to the provisions of this Licensed Vehicle Safety Policy and the motor vehicle regulations in the locality where the vehicle is operated, to exercise due care at all times when operating a Company Vehicle and to maintain the Company Vehicle at all times in a safe driving condition. Drivers are responsible for reporting moving motor vehicle violations (regardless of whether they involved a Company Vehicle) to the Driver's supervisor.

Employees must complete defensive driving refresher training and testing once a year between January 1 and December 31.

COMPANY MANAGEMENT:

Managers/supervisors who have management oversight for employees who are Drivers of Company Vehicles are responsible for administering and enforcing the Licensed Vehicle Safety Policy, including addressing motor vehicle violations with the Driver. A division representative will notify Risk Management when motor vehicle driving records (MVRs) should be obtained for new drivers, prior to extending the offer of employment. Post employment requests are acceptable when driving is incidental to the person's primary job responsibilities. Updates on employee MVRs will be obtained periodically by Risk Management, as warranted.

RISK MANAGEMENT:

Risk Management has responsibility for providing insurance on all Company Vehicles as required by state motor vehicle regulations and the terms and conditions of lease agreements. Risk Management also has responsibility for the administration and settlement of claims or losses. Risk Management will review initial MVRs for new employee

Drivers, and will review MVRs on all employee Drivers annually for compliance with this policy. Abnormalities or violations found in the review process will be identified and reported to appropriate Company Management.

LEGAL DEPARTMENT:

The Legal Department provides input on this policy as appropriate or as requested by management. In addition, the Legal Department will request an incident investigation be performed for all incidents involving a 3rd Party and communicate the results of the investigation to management as necessary.

FLEET MANAGEMENT:

Fleet Management is responsible for fleet administration, including vehicle selection, ordering, assignment and disposal.

OPERATION OF VEHICLES

DRIVER ELIGIBILITY

Risk Management will review each Driver's MVR to determine eligibility to operate a Company Vehicle. Anyone determined to be "Ineligible" is not permitted to drive a Company Vehicle. Drivers not reporting incidents listed under "Violations of Policy" to the employee's supervisor will be ineligible to drive a Company Vehicle and are subject to discipline pursuant to the Cardinal Rules of Safety.

AUTHORIZED USE OF VEHICLES

Full Personal Use of Company Vehicles is permitted for Drivers unless Driver is specifically restricted to Limited Personal Use.

RULES OF THE ROAD

The following Rules of the Road must be followed when operating a Company Vehicle:

- 1) All motor vehicle laws must be obeyed.
- 2) Company vehicles must be operated at legally permitted speeds appropriate to road, traffic and weather conditions.
- 3) All occupants must always wear safety restraints.
- 4) Defensive driving is required at all times, including safe following distance.
- 5) Compliance with the Rogers Group Substance Abuse Policy.
- 6) Driving while fatigued is prohibited.
- 7) Doors must be locked and keys removed when the vehicle is unoccupied.
- 8) Drivers are expected to exercise good judgment to ensure valuables and sensitive company records are stored out of plain sight and removed overnight.
- 9) Transporting hitchhikers or strangers is prohibited.

- 10) Distracted driving is not permitted. Drivers are to pull over and stop the Company Vehicle in a safe location to avoid distracted driving.

VIOLATIONS OF POLICY

The following are violations of this Licensed Vehicle Safety Policy, and may result in suspension of Company Vehicle privileges or other appropriate disciplinary action up to and including termination, without regard to whether the violations occurred while driving a Company Vehicle or a personal vehicle:

- Use of a Company Vehicle in violation of any criminal law or in violation of Company "Rules of the Road" above.
- Violation of the Rogers Group Substance Abuse Policy.
- Leaving the scene of an accident (Hit and Run)
- Driving-related conviction for felony, homicide or manslaughter
- Falsifying collision/incident facts
- Operating a Company Vehicle without a valid driver's license
- Permitting an unauthorized person to drive a Company Vehicle
- Refusal to submit to a drug or alcohol test, when requested by the Company or law enforcement
- In the case of moving violation convictions, reckless driving citations, or at-fault company vehicle damage within a twelve-month period, the following discipline, at a minimum, will be applied:
 - 1st violation – no discipline
 - 2nd violation – management warning
 - 3rd violation – loss of driving privileges for 60 days
- In the case of DUI, the employee is required to provide a copy of the results of the Blood Alcohol Content (BAC) test as soon as available, but no later than ten (10) days after the date of the test. Following will be the minimum discipline:
 - In a personal vehicle – for a BAC level of .08 - .149, loss of driving privileges in a company vehicle for 60 days; for a BAC level of >.149, loss of driving privileges for 90 days
 - In a company vehicle – for a BAC level of .08 - .149, loss of driving privileges for 60 days; for a BAC level of >.149, loss of driving privileges for 120 days; for any level .08 or greater, discipline prescribed in the Substance Abuse Policy. Refusal to submit to testing will be considered a .08 BAC level. A second BAC test result .08 or greater will result in termination, and a lifetime ban from re-employment.

All costs associated with the disposition of the above are the responsibility of the Driver.

VEHICLE SAFETY

The Company makes its best effort to provide vehicles designed and equipped by the manufacturers with safety features that typically include anti-lock brakes, airbags, seat belts and shoulder harness. Drivers are to familiarize themselves with and make appropriate use of all vehicle safety features. Safety –related equipment must be maintained in operating condition at all times.

Drivers are responsible for the safe operating condition of their Company Vehicle. Drivers are required to arrange appropriate preventive and scheduled maintenance. Suspected mechanical problems are to be diagnosed and repaired promptly. Government mandated inspections and safety recalls must be performed as required.

Drivers are responsible for ensuring that the Company Vehicle contains a drug-testing kit and an accident reporting kit.

INSURANCE

The Company provides automobile liability, third-party bodily injury and property damage coverage. The company is currently self-insured against vehicle loss.

Personal property insurance is not carried to protect personal belongings; if Drivers wish to have this coverage, they need to arrange it through their personal insurance agent.

POLICY APPLICATION

This policy covers all employees of Rogers Group, Inc. and affiliated companies, and non-employees riding in or driving Company Vehicles.

CHANGES TO OR TERMINATION OF POLICY

This policy may be changed or terminated at any time at the discretion of the Risk Management department without notice to any employee.

**Licensed Vehicle Safety Policy
Revised, May 2007**

ROGERS GROUP, INC. and AFFILIATES DISCIPLINE POLICY and PROCEDURE

I. POLICY STATEMENT

It is the policy of Rogers Group, Inc. to administer discipline equitably to all employees with the intent of modifying behavior or performance that is not in compliance with policy, duties and/or job expectations. Non-compliance will be dealt with through a process of appropriate discipline, which may include immediate termination. Behavior or performance at work is the responsibility of each employee. Employees with health, alcohol, drugs, financial or other types of personal or family problems are reminded of the availability of the confidential Employee Assistance Program provided by Rogers.

II. PROCEDURE

The discipline process provides options to address behavioral or performance non-compliance. Depending on the severity of noncompliance, the following options may be administered progressively or at any level deemed appropriate by the Company.

A. Verbal Counseling and Warning

The employee's supervisor documents the specific noncompliance, the content of the counseling session and any warning. As a part of this option the employee is advised of the non-compliance and receives specific feedback on what behavior or performance needs to improve and within what time frame.

B. Written Warning

A letter of warning is issued and a copy is signed by the employee. If the employee refuses to sign, it should be so noted on the warning letter.

C. Suspension or Discharge

If behavior or performance is not brought into compliance, or if the nature of the non-compliance is severe, a suspension without pay can be imposed, or the employee can be discharged.

D. Immediate Discharge

For major non-compliances, employees may be immediately discharged. A partial list of such offenses follows:

- Theft
- Falsification of Company documents/records
- Threats, fighting or other violent conduct
- Unexcused absences
- Insubordination
- Sleeping on the job
- Endangering the safety of themselves or others
- Supervisory malfeasance
- Failure to report an accident
- Failure to maintain security of protected health information
- Negligence
- Violations of the Company's Policies & Procedures

III. RESPONSIBILITY

Administration of this policy is the responsibility of every supervisor. Supervisors should confer with Human Resources prior to termination of employment.

IV. CHANGES TO OR TERMINATION OF THE POLICY

This policy may be changed or terminated at any time at the discretion of the Chief Executive Officer of Rogers Group, Inc. and its affiliated companies, without notice to any employee.

**ROGERS GROUP, INC. & AFFILIATES
OPEN-DOOR POLICY FOR EVERY EMPLOYEE**

Revised February 15, 1999

I. POLICY STATEMENT

For matters relative to their job, or Rogers Group at large, an employee should look first to their supervisor for consultation, and most questions and concerns should be resolved at that point. However, if any individual wishes to discuss a matter with someone other than their supervisor, they may do so as encouraged by the following Open Door Procedure. These matters may concern the employee's job, or the employee's observation of violations of Company policies and procedures such as fraudulent activities, safety or environmental issues, or human resource concerns.

II. PROCEDURE

- A. Each manager will take a genuine interest in the affairs of all employees under their supervision. They will promptly and satisfactorily resolve any question or concern, or if unable to do so, will refer the individual to whoever has the best opportunity to be of assistance.
- B. Of key importance is the open attitude of a manager when an employee has a question or concern about their job or the company.
- C. When brought to the attention of a manager the employee's question or concern will be handled on its own merit and in the way that seems most appropriate. The following is a guide for employees and managers to follow:

Alternative 1. Supervisor — An employee with a question or concern is advised to consult their immediate supervisor first. The majority of all questions and concerns should be resolved with one's supervisor. Usually, a frank talk is the easiest and most effective way to quick answers or resolutions.

Alternative 2. Next level of management — If the issue is not resolved to the satisfaction of either the employee or the supervisor, or if the subject is one that the employee prefers not to discuss with the supervisor, it would ordinarily be taken to the next level of management.

Alternative 3. If, for any reason, an employee prefers to discuss a question or concern with someone other than their supervisor, or other levels of management, they may contact: Corporate Headquarters by telephone – (615) 242-0585 or in writing:

- a) The Human Resources Officer for employee relations or concerns.
- b) The Safety & Environmental Officer for safety or environmental concerns.
- c) The Internal Audit Officer for knowledge or suspicions of theft, fraud or similar wrongdoing.

Unless the employee agrees to the contrary, or the Company is precluded by law, the name of the employee making a report will be held in confidence.

Alternative 4. AlertLine — If an employee prefers to remain anonymous, they may contact AlertLine, a toll free, independent outside service (800-932-5378). This independent outside service provides personnel trained to facilitate answers and resolutions to employee questions and concerns in complete confidence.

III. RESPONSIBILITY

The Human Resources Department is responsible for the administration of this policy.

IV. CHANGES TO OR TERMINATION OF POLICY

This plan may be changed or terminated at any time at the discretion of the Chief Executive Officer of the Company without notice to any employee.

Safety Management Process for All Suppliers At Rogers Group Aggregate Facilities and Worksites

10-1-04

Maintaining an *injury free* work place is the top priority at Rogers's facilities and worksites. The Rogers Group supervisor is concerned for the safety of every person on his/her site - employees, suppliers, and visitors. Rogers Group supervisors will use the following procedures to address the safety process for all suppliers.

STEP 1. Identify the Category of Supplier

Category 1 - are those suppliers who come on the site and only enter the office.

Examples: Office Machine Repair Services, Any Office Delivery, Salesperson (office only), General Visitors (office only), Janitorial Services (office only), Painting Services (office), Customers' Truck Drivers

Category 2 - are those suppliers who come on site and go places other than the office and outside of the material loading areas. These suppliers are not involved in the work process, equipment repair process, or equipment maintenance process.

Examples: Deliveries to Shop & Plant, Lawn Services, Janitorial Services, Technical Advisor, Consultants, Equipment Hauling Services, Parts Washer Service, DOT QC Technicians.

Category 3 - are those suppliers who come on site to perform tasks normally associated with the work activity, such as construction, stripping, demolition, drilling and blasting, repair or maintenance construction activities, haulage, or equipment repairs or maintenance activities.

Examples: Tire Changing Service, Painting Services, Drilling Services, Explosive Services, Plant Repair Services, Electrical Services, Crane Services, Wet Hosing Services, Equipment Repairs, Plant Erection Service, Plant Demolition, Stripping Overburden.

STEP 2. Safety Train the Supplier

Category 1 - requires no hazard training.

Category 2 - requires basic hazard training.

Category 3 - requires basic hazard training and comprehensive safety training.

Definition of Hazard Training Levels

Basic hazard training – This requires a complete reading of the Hazard Training Form and site-specific hazard training. Category 3 personnel must have the form counter signed by the RGI site supervisor. Signage throughout the location may also be used to notify suppliers of hazards and must be followed at all times. In lieu of a printed form, signage is the primary method of hazard training for customer truck drivers within the designated loading areas.

Comprehensive training – is defined as full training (30CFR, Part 48, or Part 46). For aggregates – from two (2) to eight (8) hours of initial training, 16 hours of additional training within 60 days, and eight (8) hours of annual refresher training at surface mining locations (Forty hours of training may be required in underground operations).

Training Responsibility

Hazard Training – the RGI site supervisor or designee must perform all basic hazard training and ensure that adequate signage is in place. Suppliers performing work at multiple sites must receive basic hazard training at each site, as the work hazards are unique to each site.

Comprehensive Training – the supplier is responsible for ensuring all of his/her employees are fully trained according MSHA regulations 30CFR Part 46 and/or Part 48.

Safety Training Records

Hazard Training Records – the RGI Site supervisor or designee is responsible for maintaining an annual file of signed hazard training forms to document that all Non-RGI persons have received training. A copy will be given to the supplier. Comprehensive Training Records – will be maintained by the supplier and will be provided to RGI upon request.

STEP 3. Pre-job Safety Meeting

This meeting is required prior to the contractor performing work under a purchase order agreement or other contract. The purchase order or contract must be signed before work begins. Inform the supplier that we may, if deemed necessary, request those items outlined in the meeting at any time, and failure to produce the requested items may result in termination of work.

Pre-Job Safety Meeting

The RGI site supervisor will use this check list to hold a pre-job meeting with Category 3 suppliers to inform the supplier of the following, depending on the scope of work (unless otherwise covered by agreement):

Location

- Overview of the project or work and person in charge onsite for the supplier.
- The supplier is responsible for providing a safe workplace for his/her employees.
- The supplier will follow all applicable MSHA regulations at all times.
- Rogers substance abuse policy is in effect.
- Rogers hazard training requirements (including HazCom notifications).
- Rogers requires all suppliers to perform daily safety meetings.
- Rogers requires suppliers to use the JSA process. (Rogers supervisor should review with them the critical job functions).
- Review Rogers definitions of an injury, incident, and near miss.

- All supplier injuries on RGI properties must be reported to the RGI Supervisor.
- On shift work area inspections, and mobile equipment inspection required.
- Rogers requires access, when requested, to supplier mobile equipment inspection records as well as work area inspection records.
- Hazard Communication compliance (30 CFR 47).
- Where applicable, daily crane inspections shall be performed.
- Failure at any time to follow any and all safe work practices or failure to follow all governmental regulations may result in termination of the supplier's work activity without prior notice.

Meeting Comments:

RGI Supervisor

Supplier Representative

Date

Supplier

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