



YALE ROBBINS, INC.
102 Madison Avenue
New York, NY 10016

REAL ESTATE CONSULTING
PUBLICATIONS-RESEARCH
ph (212) 683-5700
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Yale Robbins, Inc.

Safety Policy/Plan/Program

Company Policies and Procedures

Policy Statement

It is the Policy of Yale Robbins, Inc. to ensure a safe and healthy workplace for all our personnel. To accomplish this policy we will have an active, progressive and effective safety and loss prevention program designed to protect all personnel from occupational injury and illness and loss or damage from loss or damage. In pursuit of this policy, the following safety and loss prevention program will guide all management and staff.

Company Goals and Objectives

Goals

The overall goal of our safety and loss prevention program is to prevent on the job injuries and illnesses. Therefore safety and health will be an integral part of our business philosophy and our daily work routine. In order to accomplish this, the following goals have been established:

All management and staff will be involved in the development, implementation, and maintenance of our safety and loss prevention program.

Development of systems and programs that are designed specifically to meet our Safety and health needs.

Implementation of an ongoing safety and health training program for management and staff.

Communicate to management and staff their safety and health responsibilities.

To effectively comply with the recommendations resulting from the comprehensive baseline safety and health audit of our facility presented on 7/10/06.

Objectives

The following are objectives that will be undertaken to achieve health and safety excellence:

The Health and Safety Committee will be established by Iine Smithen and will



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consist of both management and staff personnel.

The Health and Safety Committee will complete the written safety and loss prevention program by March 15, 2007.

The safety and loss prevention program will be communicated to all management and staff personnel by March 15, 2007.

The safety and loss prevention program will be reviewed annually by the Health and Safety Committee. The program will be reviewed to ensure its effectiveness and to determine if the desired goals and objectives have been achieved. Changes will be made to the program as needed with approval from Yale Robbins.

Ensure that management and employee personnel know and accept their safety and health responsibilities.

Staff members will conduct periodic in-house inspections so they can recognize potential workplace hazards by March 15, 2007.

Emergency action procedures will be developed and implemented by March 15, 2007.

Safety and Health Responsibilities

Yale Robbins, Inc realizes the importance of having personnel involved in the safety and loss prevention program and that all employees understand their safety and loss prevention responsibilities To ensure that you know and understand your role in our safety and loss prevention program, the following responsibilities have been developed for each job description at our company:

The President (Yale Robbins)

Oversees the development, implementation and maintenance of the safety and loss prevention program.

Provides active leadership and adequate resources to maintain the program

Develops and assigns safety and health responsibilities to management personnel

Sets a good example by following the required safety guidelines

Reviews accident reports

Ensures that a reliable system is in place for employees to report conditions or situations that they believe are potentially hazardous.

Office Manager (Iine Smithen)

Establish a safety committee comprising of management, supervisors and staff.

Provides the leadership and positive direction necessary for maintaining the program.

Holds all supervisors accountable for their assigned responsibilities.



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Actively participates and supports employee participation the program. Also follows up on recommendations made by supervisors.

Ensures prompt action is taken whenever a hazardous situation is observed.

Makes sure all potential hazards are covered by specific rules to minimize risk.

Makes sure that all accidents are promptly reported, thoroughly investigated and properly documented.

Keeps abreast of accident and injury trends that occur.

Helps develop and implement emergency procedures.

Supervisors

Supervises and evaluate employees' safety and health performances.

Investigate accidents and near miss accidents to determine the root cause.

Actively discourage all potentially hazardous "shortcuts" undertaken by employees.

Consistently and fairly enforce safe work procedures and rules.

Make sure employees are aware of literature on company website related to health and safety issues.

Make sure each employee knows what to do in the event of an emergency.

Ensures that appropriate record keeping is maintained with respect to any incident.

Employee Involvement

Be familiar with safety and health accident prevention program, to abide by all safety and health rules, work practices and regulations.

Perform their work tasks in a safe manner and not take unsafe "short cuts".

Maintain their work area in a clean and neat condition.

Fill out the employee safety suggestion form when deemed necessary.

Report any and all injuries or unsafe working conditions to their supervisor using the attached employee hazard identification form.

Know what to do in the in the event of an emergency.

Safety and Health Performance Accountability

As stated in our company policy, safety and health has been given top priority because it is good for business and for the well-being of our employees. We expect all employees to participate in our program. In fact your participation in this program is part of your annual performance evaluation. The success of our program is dependent on every individual knowing and practicing their safety and health responsibilities. Management and employees who disregard their safety and health responsibilities will be held



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accountable and may be subject to termination for severe infraction, on repeated infraction of the company's safety policy.

NOTE: A malicious or extreme safety infraction can result in corrective action including immediate termination with no verbal or written warnings. Any written warning will remain in an individual's personnel file.

Safety and Health Training Program

Training is an essential tool for our entire staff to reduce their risk of experiencing a workplace accident and injury. Managers, supervisors, and employees need to be able to recognize, understand, and avoid potential hazards to themselves and to their co-workers. The Office Manager is responsible for ensuring that all managers, supervisors, and employees are made aware of proper safety procedures as outlined on the company website and any updates that are made. The company website has various brochures and fliers relating to:

- Preventing falls/slips/trips;
- Preventing back injuries;
- Accident Investigation forms;
- Emergency procedures.

Safety and Health Committee

Yale Robbins, Inc. has established a committee consisting of management, employees, and the safety coordinator. The committee will assist in the development, implementation, and periodic evaluation of our safety and health activities. Members will be rotated periodically at intervals to allow for maximum involvement and increase safety awareness. Meetings will be held every three months on the first Wednesday of the month at 11 o'clock. All committee members are expected to attend. The committee will be responsible for the following tasks:

- Review of existing safety and health rules and procedures to ensure that these rules are current, pertinent, and being followed.
- Provide suggestions for employee training and additions or corrections to safety materials on the company's website.
- Review all accident reports to determine its root cause.



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Audit the results of all safety inspections conducted.

Involved in preliminary hazard analysis for new equipment, processes, and designs.

Conduct periodic in-house safety inspections.

Provide recommendations to management on safety and health issues.

Evaluation of the safety and loss prevention program.

The safety committee will make their findings and recommendations available to Yale Robbins, President.

In-House Safety Inspections Program

Safety inspections are an integral part of our accident prevention program. Inspections will be conducted for the following reasons:

Maintaining a safe and healthful workplace.

Recognizing unsafe work practices.

Identifying unsafe working conditions.

Increasing safety awareness.

Preventing injuries and illnesses.

Every individual has some responsibility for conducting safety and health inspections. Supervisors and employees will routinely conduct daily inspections of their immediate work area. Whenever possible, employees will promptly institute appropriate corrective measures. If the condition cannot be immediately corrected, the employee must notify their area supervisor. The employee can either orally inform the area supervisor or complete a [Hazard Report Form](#). If the employee does not complete the form, then it is the responsibility of the supervisor to complete the form. A Hazard Report Form must be completed for all hazards that cannot be immediately corrected by the employee.

If the supervisor cannot immediately correct the hazard, the supervisor will develop an appropriate action plan for the correction of the hazard. Appropriate interim protection



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measures must be instituted if the hazard cannot be corrected immediately. Yale Robbins will be contacted if assistance is needed to determine the appropriate corrective measure and/or interim protection measures.

Monthly safety and health inspections will be conducted by our safety and health committee. When necessary, the committee will use the services of in-house personnel who have special knowledge of the maintenance operations, technical equipment, etc. The [inspection checklist](#) will be utilized by the committee for their inspection. The committee will also review the completed checklist during their monthly meetings. A copy of all completed checklists and corrective actions implemented will be forwarded to for review.

Accident Investigation Program

The vast majority of accidents that occur in the workplace are preventable. Unfortunately, even with the best program accidents may still occur. The steps outlined here are means to ensure that the same type of accident does not recur. Accident investigations are to determine the facts and not to place blame on an individual.

All accidents must be reported to your immediate supervisor promptly. All accidents are to be investigated; even non-injury accidents are to be investigated by the immediate supervisor of the employee involved in the incident. An accident investigation team (Safety Committee) has been organized and will be activated in the following situation:

If the outcome of the accident resulted in a serious injury or the outcome could have resulted in a serious injury.

If the accident has occurred previously.

If numerous personnel perform the task involved in the accident.

[Accident Investigation procedures](#) are outlined on the company website will be followed when investigating an accident.



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Emergency Action Plans

This section will address our emergency action plans. Emergency action procedures will provide for an effective evacuation of personnel from our facility in the event of an

accidental release of gases, fires, explosions, or natural disasters. An emergency action plan has also been developed in the event of a personal injury.

The Safety and Health Committee and Safety Coordinator (SC) are responsible for the development and evaluation of our emergency action plans. The SC and facility supervisors are responsible for implementation of the procedures.

Emergency evacuation routes are marked by illuminated EXIT signs throughout the office. It is the responsibility of each supervisor to ensure that each employee under their control is trained and understands the correct procedures to follow in the event of an emergency.

Yale Robbins, Inc. Emergency Action Plan

1. Safety Coordinator: Iine Smithen
 Telephone Number: (212) 683-5700 x363
 Cell Phone Number: (347) 675-5456

2. Procedures for Reporting Emergencies:

<u>Type of Emergency</u> _____	<u>Procedures to Report</u>
Fire	Inform your manager, follow instructions of Fire Warden.
Personnel Injury	Use Employee Accident Report Form.

3. Emergency Evacuation Routes and Procedures:



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Emergency evacuation routes are marked by illuminated EXIT signs throughout the office. Supervisors must ensure that all employees in their work area have been trained on the routes and procedures to follow.

NOTE: In the event of an emergency evacuation, Yale Robbins, Inc. will follow the instructions of the building's management.

4. Fire Safety Procedures:

The responsibility to ensure the safe evacuation of the staff during the untimely event of a fire has been entrusted to a very capable and responsible member of staff. John McHugh is the Fire Warden for our floor. Under John's direction is Steven Rothman, the deputy Fire Warden and 2 other staff members Ian Goodwin as the Male Searcher and Danuta Holmes as the Female Searcher.

It is John's responsibility to ensure the safe evacuation of the office via a designated exit (usually the front stairwell next to the elevators). He alerts the staff to the fire, instructs the staff members to evacuate down the stairwell in an orderly manner, single file, and he attempts to keep everyone calm while reminding them to meet at the designated area across the street (M&T Bank Building). The Deputy Fire Warden assists with this process by walking the floor to make sure that all employees have left their workstations. Meanwhile the Searchers have the responsibility to ensure that the ladies room and the men's room are completely evacuated.

The searchers then evacuate followed by the deputy warden and the warden. After evacuation the Fire Safety Committee performs a head count at the designated meeting area to ensure that all employees are present. The Warden then calls 911 to make sure that the fire has already reported to the authorities.

5. Evacuation Drills:

Evacuation drills will be conducted 2 times per year. The Safety Coordinator in conjunction with Production Supervisors will schedule the drills. The Safety Coordinator will share the results of the drills with the Safety and Health Committee.



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Record-

keeping

The following records will be kept by Iine Smithen/ Mary Robbins.

- Minutes of Safety Committee Meetings
- Accident Investigation Reports
- Workers' Compensation Claims or OSHA 101 Form
- Safety and Health Training Records
- Exposure and Medical Records
- Annual Fire Extinguisher Inspections
- In-House Safety and Health Inspection Records
- Completed Safety and Health Program Evaluation Worksheets
- Disciplinary Action Letters

Iine Smithen will review all records as part of an overall evaluation of our safety and health program.

Accident and Injury and Illness Trend Analysis

At least annually a comprehensive trend analysis will be performed by the employer. The employer will review the following information to determine if a pattern exists that has not been detected by other in-place safeguards:

- Workers' Compensation Claims and/or OSHA 101 Log
- Accident Investigation Reports
- Employee Complaint Forms
- Hazard Reports

If deficiencies are discovered, the employer will develop and institute corrective procedures using established protocol.



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Program

Evaluation

The Safety and Loss Prevention Program will be audited. The goals, objectives, and program elements will be evaluated to determine if they are meeting their intended purpose. To determine this, the audit will consist of the following:

Interviews with a cross section of management and hourly paid personnel.

Review of records and reports.

Observation of job tasks and an inspection of the facility.