



THE IMT GROUP SAFETY GUIDE

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Introduction

The IMT Group recognizes that our people drive the business. As the most critical resource, employees will be safeguarded through training, provision of appropriate work surroundings, and procedures that foster protection of health and safety. All work conducted by The IMT Group's employees will take into account the intent of this policy. No duty, no matter what its perceived result, will be deemed more important than employee health and safety.

The IMT Group is firmly committed to the safety of our employees. We will do everything possible to prevent workplace accidents and we are committed to providing a safe working environment for all employees.

We value our employees not only as employees but also as human beings critical to the success of their family, the local community, and The IMT Group.

Employees are encouraged to report any unsafe work practices or safety hazards encountered on the job. All accidents/incidents (no matter how slight) are to be immediately reported to the supervisor on duty.

A key factor in implementing this policy will be the strict compliance to all applicable federal, state, local, and company policies and procedures. Failure to comply with these policies may result in disciplinary actions.

Respecting this, The IMT Group will make every reasonable effort to provide a safe and healthful workplace that is free from any recognized or known potential hazards. Additionally, The IMT Group subscribes to these principles:

- 1) All accidents are preventable through implementation of effective Safety and Health Control policies and programs.
- 2) Safety and Health controls are a major part of our work every day.
- 3) Accident prevention is good business. It minimizes human suffering, promotes better working conditions for everyone, holds The IMT Group in higher regard with customers, and increases productivity.
- 4) Management is responsible for providing the safest possible workplace for Employees. Consequently, management of The IMT Group is committed to allocating and providing all of the resources needed to promote and effectively implement this safety policy.
- 5) Employees are responsible for following safe work practices and company rules, for preventing accidents and injuries, and following The IMT's Return to Work Program. Safety and Health Committee will establish lines of communication to solicit and receive comments, information, suggestions and assistance from employees where safety and health are concerned.
- 6) Management and supervisors of The IMT Group will set an exemplary example with good attitudes and strong commitment to safety and health in the workplace. Toward this end, management must monitor company safety and health performance, working environment and conditions to ensure that program objectives are achieved.
- 7) Our safety program applies to all employees and persons affected or associated in any way by the scope of this business. Everyone's goal must be to constantly improve safety awareness and to prevent accidents and injuries.

Everyone at The IMT Group must be involved and committed to safety. This must be a team effort. Together, we can prevent accidents and injuries. Together, we can keep each other safe and healthy in the work that provides our livelihood.

Pre-Employment Screening

The IMT Group has an obligation to its policyholders to determine realistically its needs for employees and to select the very best qualified available people to handle its insurance business.

As means of selecting the very best qualified candidates and to provide a safe working environment for employees, The IMT Group has developed a Pre-Employment Screening process. This process includes a two to three step interview process, personality assessments, followed by a thorough background check and drug screening process.

The Violent Crime Control and Law Enforcement Act of 1994 “the Act”, Public Law 103-322, H.R. 3355; 18 U.S.C. Sections 1033 and 1034 provides, in part, that no person who has been convicted of a felony involving dishonesty or breach of trust or an offense under the Act shall engage in the business of insurance without having first obtained the consent of the insurance commissioner of the person’s resident state.

To ensure compliance with the Act as well as to ensure The IMT Group prevents negligent hiring a post-offer pre-employment background check will be completed. The pre-employment screening searches administered through a third party vendor search:

- County Criminal (Statewide If Available)
- Federal Criminal
- Global Watch
- National Sex Offender Registry
- Nationwide Alert
- Social Security Trace
- Education Verification
- Employment Verification
- 5 Panel Drug Screening

All candidates receive the FCRA Summary of Rights when completing the application for employment. The IMT Group ensures compliance with the FCRA and follows the appropriate Adverse Action steps when addressing results of background checks. Any criminal results or discrepancies obtain through the background check process will be evaluated and The IMT Group will consider the severity, length of time passed and nature of the charge prior to making a final decision of the continued employment offer.

Injury & Illness Management

The IMT Group has developed a variety of best practice solutions in dealing with potentially hazardous situations as well as general well-being in day to day activities. The IMT Group’s mission is to provide a work environment free from hazards and regular training to promote safety as part of a daily job responsibility. Below are proactive preventative steps all employees are responsible for incorporating on a daily, annual, or situational basis; as well as steps the designated Safety Coordinator will take to ensure compliance and consistency.

All employees are responsible to perform his or her duties in a safe manner in order to prevent injury to themselves and others.

As a condition of employment, employees must become familiar with, observe, and obey The IMT Group's rules and established policies for health, safety, and preventing injuries while at work. Additionally, employees are expected to learn the approved safe practices and procedures that apply to their work.

Before beginning special work or new assignments, an employee should review applicable and appropriate safety rules.

If an employee has any questions about how a task should be done safely, he or she is under instruction not to begin the task until he or she discusses the situation with his or her supervisor. Together, they will determine the safe way to do the job.

If, after discussing a safety situation with his or her supervisor, an employee still has questions or concerns, he or she is required to contact the Safety Coordinator.

NO EMPLOYEE IS EVER REQUIRED to perform work that he or she believes is unsafe, or that he or she thinks is likely to cause injury or a health risk to themselves or others.

Injury & Illness Prevention

1. **Conduct:**

Horseplay, 'practical jokes,' etc., are forbidden. Employees are required to work in an injury-free manner displaying accepted levels of behavior. Conduct that places the employee or others at risk, or which threatens or intimidates others, is forbidden.

2. **Drugs and Alcohol:**

Use and/or possession of illegal drugs or alcohol on company property or on company time are forbidden.

Reporting for work while under the influence of illegal drugs or alcohol is forbidden. All employees share in the responsibility of maintaining a work environment free from Drugs and Alcohol including the prompt reporting of any knowledge or suspicious activity to a supervisor, manager or Human Resources.

3. **Housekeeping:**

The following areas must remain clear of obstructions:

- Aisles/exits
- Fire extinguishers and emergency equipment
- All electrical breakers, controls, and switches

You are responsible to keep your work area clean and safe. Clean-up several times throughout the day, disposing of trash and waste in approved containers, wiping up any drips/spills immediately, and putting equipment away as you are finished with them.

Housekeeping Safety Tips:

- Never leave file drawers open, or open multiple file drawers at once.
- Do not stack heavy or bulky objects on top of cabinets
- Do not store frequently used objects above shoulder height or below knee height.

- Keep your work area free of trip hazards such as storage in walkways, cords across aisles, and damaged floor covering.

4. **Injury Reporting:**

All work-related injuries must be reported to your supervisor/manager or Safety Coordinator immediately. Failure to immediately report injuries can result in loss of Workers' Compensation benefits. After each medical appointment resulting from a work-related injury, you must contact your Safety Coordinator to discuss your progress. You must also give your Safety Coordinator any paperwork that you received at the appointment. Please see Injury and Illness Reporting for full reporting instructions.

5. **Equipment Operation:**

You must specifically be trained and authorized by your supervisor to operate the following:

- Company vehicles
- Ladders
- Mailroom equipment

Never operate or use damaged or defective equipment. You are required to immediately report unsafe issues or concerns to your supervisor. Never tamper with, remove, or deactivate machine guards or controls designed to ensure safe operations.

6. **Ladders:**

- Inspect all ladders prior to each use;
- Ladders must be placed on secure footing;
- Only one person is allowed on a ladder at a time;
- Never stand on the top two steps of a stepladder;
- Always maintain 3-point contact when working on ladders;
- Never reach beyond arm length when working on a ladder; and
- Never use metal ladders when working on or around electrical equipment.

7. **Hazards:**

Depending on the nature of your position with The IMT Group the variety of hazards that you may be exposed to can vary. It is The IMT Group's expectation that employees evaluate and identify hazards when working from remote locations and to contact their Manager or Safety Coordinator if unsure how to safely deal with an unknown hazard.

- Animal Control
 - The IMT Group requires employees to proactively discuss animal situations prior to conducting a field visit. Pet owners must agree to secure the animal during onsite inspections. IMT employees are instructed to not access any property to which the animal has not been properly secured.
- Fall prevention
 - There is a risk of falling when portable ladders are not safely positioned each time they are used. While on the ladder, it may move and slip from its supports. There is a risk of losing balance while getting on or off the ladder which can result in injuries ranging from sprains to death. Employees are required to assess the worksite to determine if the working surfaces have the strength and structural integrity to safely support the ladder.

- Repetitive motion
 - To prevent repetitive motion injuries the Safety Committee will partner with employees to understand the best way to set up a computer workstation for that individual. Working with the body in neutral position reduces stress and strain on the muscles, tendons, and skeletal system and reduces your risk of developing a musculoskeletal disorder.
 - IMT requires employee's work stations to support the below good working positions:
 - Hands, wrists, and forearms are straight, in-line and roughly parallel to the floor.
 - Head is level, or bent slightly forward, facing, and balanced. Generally it is in-line with the torso.
 - Shoulders are relaxed and upper arms hang normally at the side of the body.
 - Elbows stay in close to the body and are bent between 90 and 120 degrees.
 - Feet are fully supported by floor or footrest
 - Back is fully supported with appropriate lumbar support when sitting vertical or leaning back slightly
 - Thighs and hips are supported by a well-padded seat and generally parallel to the floor.
 - Knees are about the same height as the hips with the feet slightly forward.

Regardless of how good your working posture is, working in the same posture or sitting still for prolonged periods is not healthy. You should change your working position frequently and well as do finger, hands, arm and torso stretches throughout the day to further prevent the risk of injury.

8. **Emergencies:**

Building Evacuation and Severe Weather Shelter: [Evacuation Memo](#)

Fire Extinguisher Locations: [Memo](#)

Medical Emergencies: (chest pains, loss of consciousness, fall from a height, etc.) All employees will be provided care, first-aid and emergency services as required while on The IMT's premises.

- Upon discovering a medical emergency, call 911
- Call the Receptionist ("0") and report the nature of the medical emergency and location
- Stay with the person involved being careful not to come in contact with any bodily fluids, unless properly trained and equipped.
- Send two persons (greeters) to the building entrance, Main Reception, to await the fire department. (One person should call and hold an elevator car. Often two fire department units will arrive, so the second greeter should wait at the entrance to receive the second unit while the first greeter escorts the fire department personnel to the scene.
- Employees in the immediate vicinity of the emergency, but not directly involved, should leave the area.
- Human Resources Director will make any necessary notifications to family members of the person suffering the medical emergency.

Workplace Violence: IMT strongly believes that all employees should be treated with dignity and respect. Acts of violence will not be tolerated. To help ensure a work environment free of violence, The IMT Group prohibits guns, knives, explosives or any other weapons in the work place or on company property. Any

instances of violence must be reported to the employee's supervisor and/or the Safety Coordinator/Human Resources Director. All complaints will be fully investigated. IMT will promptly respond to any incident or suggestion of violence. Violation of this policy will result in disciplinary action, up to and including immediate discharge.

- Any employee who feels that she/he has been threatened should immediately report their concern to their manager and to Human Resources.
- If any person is observed exhibiting threatening behavior or making threatening statements, the person discovering the situation is obligated to warn others in the area and immediately notify Human Resources and stay away from the person exhibiting threatening behavior.
- Depending upon the level of concern, the police department (911) should be called immediately.
- Never attempt to confront any person exhibiting threatening behavior.

If you have reason to believe that events in your personal life could result in acts of violence occurring at work, you are urged to confidentially discuss the issue with Human Resources so that a prevention plan can be developed. Life Assistance Program is also available 24/7 to employees and their family members; 1.800.538.3543; or CignaBehavioral.com/CGI.

Blood Borne Pathogens: Blood and other bodily fluids can carry pathogens, which are capable of causing diseases in others. This includes HIV, which leads to AIDS and hepatitis. Because we cannot tell by looking at a person if they are infected with a pathogenic disease, we must take precautions following an illness or injury when bodily fluids are released.

- In the event of a person losing bodily fluids, stay away from the area and warn others to also do so. You can still stay close to the ill/injured person to support him/her, just be sure to stay out of contact any bodily fluids.
- In the event that you find spilled bodily fluids, a syringe, or other medically contaminated materials, do not attempt clean up by yourself. Call Safety Coordinator immediately for instructions.

9. **Company Vehicles and Driver Safety:**

[The IMT Group Company Car Policy](#)

10. **Electrical Safety:**

- a) Never operate or tamper with the electrical main switch or breakers. You are authorized only to operate switches/disconnects on/for individual machines.
- b) Report all electrical problems and suspected problems to your supervisor.
- c) All junction boxes, control boxes, connections, and other wiring must have covers securely installed to prevent accidental contact.
- d) Inspect all plugs, cords, and portable equipment prior to use.
- e) Report any damaged electrical equipment to your supervisor. Only authorized personnel are permitted to make repairs.

f) Extension cords are to be used only for temporary applications. Never stretch cords across aisles or areas where others may trip over them. Do not attach extension cords to the building or run them under rugs/mats or through walls.

g) Any personal electrical devices must be approved by The IMT Group prior to use.

11. **Lifting:**

a) If you need help moving material, request assistance.

b) When you lift, use your leg muscles by squatting close to the load, preserving the curve in your back, spreading your feet, and lifting with your legs, keeping the load close to your body.

c) When you turn holding an object, move your feet, and do not twist.

12. **Staying Safe:**

To share in the responsibility of staying safe immediately report any unsafe conditions or situations to your supervisor. If you have suggestions on improving any aspect of safety in the facility, discuss it. If you are unsure of how to operate a piece of equipment or complete an assignment, ask for help. Asking for help when you are unsure reduces the chance of injury.

Staying Safe Safety Tips:

- Always be aware of your surroundings. Keep your head up and hands out of your pockets while walking to and from your car.
- Immediately report any suspicious activity or persons to the Safety Coordinator. And immediately report any theft to the Safety Coordinator.
- When parking, remove all valuables from sight and lock car doors.
- Keep all valuables (money, purse, jewelry, etc.) out of sight when at your desk. Do not bring large sums of money or other valuables into the building.
- Secure laptop computers, PDAs, and other small electronic devices before leaving your workspace for extended periods of time.

- If working alone and are in the office before or after regular business hours, on weekends or holidays, observe these additional guidelines:
 - Be sure doors close and lock after you.
 - Turn on lights as you move through the building.
 - Always be aware of the closest telephone (do not hesitate to call 911 if you feel threatened).
 - Be sure that someone at home knows that you are at work and is expecting you to check in by a specified time.
 - As you leave the office, be sure to turn off all equipment, lights, etc., after use.
- Weapons, including firearms, knives with blades longer than two inches, bow/arrow, pepper spray (mace, tear gas), and clubs, are not allowed on The IMT Group property.

When working at a customer location, employees are required to follow the above rules, as well as all customer rules and procedures, and work in a manner that reflects positively on the company.

Employees of The IMT Group are required to follow all client safety and security procedures during client visits. If your client host does not advise you regarding safety hazards consider the following:

- Emergency exit location(s);
- Keep your eye on the path you are walking and avoid any tripping/slipping hazards. When on stairs maintain three point contact (hand on rail and feet on stairs);
- When visiting manufacturing or construction sites, eye protection, hearing protection, and hard hats are frequently required. Ideally, this equipment will be in the possession of The IMT Group employee and not provided by the client.

If you will be touring a factory or construction site, dress appropriately. Wear shoes that support your feet and are slip resistant. Avoid clothing that is either constrictive or too loose; loose clothing could get caught in machinery or other equipment.

These rules are established to help you stay safe and injury free. Violation of the above rules, or conduct that does not meet minimum accepted work standards, will result in discipline, up to and including discharge.

13. Safety Committee

In order to promote better communication between employees and management, an Executive Safety Committee and a Safety & Health Committee has been established for The IMT Group's operations. Its primary function is to serve as a two-way channel of communication and to promote safety awareness throughout the workplace.

Megan Wonsmos is designated as The IMT Group's Safety Coordinator. Dalene Holland is designated as the Associate Safety Coordinator. The Safety Coordinator is responsible for implementation and compliance with the Safety and Health Policy of The IMT Group and is accountable for results as measured by criteria, such as incident rates.

Other responsibilities include:

1. Resolve questions, approve and/or recommend necessary expenditures to correct unsafe conditions.
2. Make regular office and ground-job site tours, and safety inspections to determine if safe work practices are being observed; ensure that unsafe conditions do not exist.
3. Actively participate and follow the safety and health programs.
4. Plan, coordinate, perform, or delegate all safety training and testing given to supervisors and employees. Review results to be sure they are satisfactory. Maintain appropriate records of training and testing.
5. Review disciplinary actions with the employees.
6. Personally perform safety inspections, accident investigations, review safety inspection reports, and unsafe conditions reported by supervisors, employees, or others. Make or obtain corrections as required to maintain a safe workplace and ensure compliance.
7. Ensure safety awareness among workers through regular meetings.
8. Ensure compliance with safe work practices and The IMT Group's safety rules. Investigate accidents and assist with completion of accident report forms when required.
9. Ensure that specific programs (i.e. annual safety training) are implemented and complied with consistently.

ORGANIZATION:

The Executive Safety Committee consists of:

- Sean Kennedy
- Chris Owenson
- Mark Vasey
- Rich Nauman
- Dalene Holland
- Marsha Aldridge

The Safety & Health Committee consists of:

- Megan Wonsmos, Safety Coordinator
- Dalene Holland, Associate Safety Coordinator
- Jon Mumm, Claims
- Rosie Jones, Personal Lines
- Byron Frick, Commercial Lines
- Kevin Koenigsberg, Claims
- Dennis Sloan, IMT Computer Services
- Jon Clement, R&D
- Matt Casey, Marketing

The Employee Safety & Health Committee will meet twice per year and will report to the Executive Safety Committee. The meeting will be chaired by the Safety Coordinator or Associate Safety Coordinator. Should a scheduled meeting have to be postponed, it will be held later in the month, on a date and time determined by the Safety Coordinator.

FUNCTION:

The Safety & Health Committee has the following functions:

1. Conduct Safety/Housekeeping inspection(s) of one or more departments as part of each meeting.
2. Review and update safety rules and safe operating procedures.
3. Review accidents and “near miss” incidents reported since the last meeting, and suggest means for preventing future occurrences, including setting reasonable goals aimed at improving safety and health.
4. Convey, review, and comment on safety suggestions submitted by employees.
5. Promote safety awareness among all employees through safe attitudes and day-to-day interactions.

Injury & Illness Reporting

Any work-related injury or suspected injury must be reported immediately to your supervisor/manager or Safety Coordinator. A First Report of Injury form must be completed. Failure to promptly report an injury may result in disciplinary action. Employees are urged to report hazardous conditions and “near miss” incident to their supervisors before injuries result.

Injury Reporting Process:

1. Immediately report injury to supervisor/manger, Safety Coordinator or Human Resources to complete the [First Report of Injury form](#).
2. If injury is reported to the Supervisor/Manager then that individual is responsible to immediately provide completed First Report of Injury form to the Safety Coordinator.
3. If determined necessary the Safety Coordinator will contact The IMT Group's Worker's Compensation insurance carrier to report the injury.
4. If medical attention is required the Safety Coordinator will issue an [Accident/Incident Report](#) for the injured employee to take to the treating medical practitioner. The employee must return this form to the Safety Coordinator by the next business day.
5. After each practitioner appointment, the employee must report to the Safety Coordinator to review his/her progress.
6. An accident investigation may be conducted to determine the root cause of the accident. The injured employee will be asked to participate in the investigation.
7. The IMT Group may provide light duty work for employees recovering from injury. Employees are required to return to work immediately upon release.

Any attempt to defraud The IMT Group with false worker's compensation claim will result in disciplinary action. The case can also be referred to the district attorney for possible prosecution.

Return to Work Program

It is our goal to prevent work-related injuries from happening. We are always concerned when one of our employees is injured or ill due to a work-related condition. We believe that such absences cost both The IMT Group and its employees. We want our injured employees to get the best possible medical treatment immediately to assure the earliest possible recovery and return to work.

The IMT Group has a workers' compensation program available for employees who have suffered work-related injuries. The program's administrator will determine, based upon their guidelines, whether you are eligible for wage loss or medical expenses under that program. All Workers Compensation Claims will run congruently with FMLA when applicable.

The IMT Group wants to provide meaningful work activity for all employees who become unable to perform all, or portions, of their regular work assignment. Thus, we have implemented a Return to Work Program, which includes transitional or light duty work. The Return to Work Program is temporary, not to exceed six months.

The IMT Group may provide Transitional Return to Work (light duty) jobs for persons injured at work. Transitional work is meant to allow the injured employee to heal under a doctor's care while she/he remains productive. Employees are required to return to work immediately upon release.

- All work-related injuries should always be reported immediately to your supervisor no later than the end of the day on which the injury occurs.
- You must complete and sign a First Report of Injury or Illness form.
- When medical treatment is sought, the injured employee must advise their supervisor that they are seeking treatment and obtain an Accident and Illness form. Regardless of the choice of physicians, the Return to

Work form must be completed for each practitioner visit. The IMT Group will not accept a general note stating that you are only to be off of work.

- Under this program, temporary light duty work may be available for up to sixty (60) days (with a review of your progress every 30 days) while you are temporarily unable to work in your regular job capacity. Transitional or light duty work beyond sixty (60) days, up to a maximum of six (6) months, will be evaluated on a case-by-case basis.
- Non-emergency medical appointments are to be scheduled as to not interfere with working hours.
- If you are unable to return to your regular job, but are capable of performing transitional duty, you must return to transitional duty, if available. Failure to do so will result in your not being eligible for full disability benefits under the workers' compensation program, and may result in disqualification for certain employee benefits and, in some cases, be a basis for termination.
- Employees who are unable to work and whose absences The IMT Group approves must keep us informed on a weekly basis of their status. Failure to do so will result in a reduction in benefits available and discipline, up to and including termination from employment.
- If you are unable to return to your regular job or transitional duty, your absence must be approved under the Family Medical Leave Act (FMLA) program. For this purpose, you need to complete a Family Medical Leave Request form and submit it to the Human Resources Department. Employees who are not eligible for leave under FMLA must return to light duty or regular work if at all possible. If you are unable to return to any available work, your job position may be filled after a reasonable time. When able to do so, you will be entitled to return to a suitable position, if available and consistent with any limitations. However, you must keep us regularly informed of your status and any changes in your condition.
- Employees must provide an Accident and Illness form indicating they are capable of returning to full duty. Permanent restrictions will be evaluated on a case-by-case basis and relate to the performance of essential job functions. No permanent light duty positions will be created.
- Cooperate with our third-party administrator and provide accurate and complete information as soon as possible so that you receive all benefits to which you are entitled. If you have problems or concerns, please contact Safety Coordinator.
- Employees who are FMLA eligible, benefits will run congruently.

Annual Training Required

All employees are required to complete annual Safety Training which includes education on issues including:

- Natural Disaster
- Escape Fire
- Reporting an injury
- Return to Work Program
- Automobile safe driving (fleet)
- Ladder Safety (fleet)

New employees are required to complete safety training as part of their orientation process.

Manager

- Safety & Health Orientation (philosophy and expectations)
- Injury Reporting and Return to Work Program
- Building Evacuations and Severe Weather Shelter
- Substance Abuse
- Crisis Management

Contacts

Megan Wonsmos, Safety Coordinator	515-457-5651
Dalene Holland, Associate Safety Coordinator	515-327-2764
Jon Mumm, Claims	515-327-2855
Rosie Jones, Personal Lines	515-457-5606
Byron Frick, Commercial Lines	515-327-2820
Kevin Koenigsberg, Claims	515-327-2871
Dennis Sloan, IMT Computer Services	515-327-2845
Jon Clement, R&D	515-327-2709
Matt Casey, Marketing	515-327-2897