

**COMPANY COMPREHENSIVE
HEALTH AND SAFETY
PROGRAM
2016**

**Nature's Capital, LLC
Boise, Idaho**

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Boise, Idaho

OCCUPATIONAL HEALTH AND SAFETY POLICY

Nature's Capital, LLC is committed to providing a safe, accident-free, and healthy work environment for everyone. Excellent safe and healthy conditions do not occur by chance. Rather, they are the result of diligent work and careful attention on the part of each member of the company's team.

A safe work environment is a system of interacting components: staff, equipment, and the physical and natural environments we work in. The foundations of our safety system are teamwork and communication. Clear and open communication is required of all team members at all times. Staff who notice hazards or other safety problems, or feel that they need additional training, must communicate these concerns effectively. We will work together to address these concerns and take corrective action when needed.

We are all obligated to know the company safety standards, and most important, to abide by them. Due to extreme conditions of our work environment, we all must maintain a strong safety culture, positive attitude and safety awareness through personal adherence, personal contact, training, and regularly scheduled safety meetings. It is the duty of all employees to perform their work with maximum regard for the safety of themselves and co-workers.

Our safety policies are based on past experience and current standards, and are also an integral part of the company's personnel policies. This means that compliance with the policies is a condition of employment and must be taken seriously. Failure to comply is sufficient grounds for disciplinary action or for termination of employment.

Safety and health are a top priority in this organization and is every bit as important as productivity and quality. In fact, they go hand in hand. Of course the best reason for you to observe these policies is because it's in your own self-interest to do so. Conscientiously following them can help you stay safe, healthy, and able to work, play, and enjoy life to its fullest.

Sincerely,

Steven K. Rust
Owner/Principal Ecologist

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INTRODUCTION

It is the policy and top priority of Nature's Capital, LLC to provide an accident-free and comfortable work environment by eliminating health and safety hazards from our office and field work environments. Our health and safety program, and specific individual programs, have been developed to assure compliance with federal, state, and local regulations.

In order to maintain the safety standards desired by our company, it is necessary to actively pursue an accident prevention program through all levels of our company. Health and safety are functional responsibilities of each employee.

Health and safety are of vital interest to everyone in the company. Each level of our organization is accountable for safe performance. Compliance with this program and safety and health rules are taken very seriously. This means that failure to comply is sufficient ground for disciplinary action or for termination of employment. These policies are an integral part of the company's personnel policies.

After brief discussion of regional state health and safety plans, this document is arranged into four major sections: (1) management commitment and employee involvement; (2) worksite analysis; (3) hazard prevention and control; and (4) training for employees, supervisors and managers. In the first section, management commitment and employee involvement, the underlying principal is management leadership and employee involvement are complementary. Management leadership provides the motivating force and the resources for organizing and controlling activities within the organization. In an effective program, management regards worker safety and health as a fundamental value. Employer involvement provides the means through which workers express their own commitment to safety and health, for themselves and their fellow workers.

In the second section, a worksite analysis means that we analyze all worksite conditions to identify and eliminate existing or potential hazards. The goal is also to identify conditions and operations in which changes might occur to create hazards. We have conducted a comprehensive, baseline survey, and have a system in place for periodic updates.

Hazard prevention and controls (the third section of this document) are triggered by a determination that a hazard or potential hazard exists. Where feasible, hazards are prevented through project design. Where it is not possible to eliminate them, hazards are controlled to prevent exposure to unsafe or unhealthy work environments. Elimination or control is accomplished in a timely manner once a hazard or potential hazard is recognized.

Finally, training is the fourth section of this document. Training is the backbone of this system. For management to lead, for personnel to analyze the worksite for hazards, and for hazards to be eliminated or controlled, everyone involved must be trained.

REGIONAL OCCUPATIONAL HEALTH AND SAFETY STATE PLANS

United States Department of Labor, Occupational Safety and Health Administration (OSHA) regulations apply to most private sector employers and workers in all 50 states, the District of Columbia, and the other United States jurisdictions either directly through OSHA or through an OSHA-approved State Plan. State Plans are OSHA-approved health and safety programs operated by individual states instead of OSHA. Section 18 of the Occupational Safety and Health Act encourages states to develop and operate their own health and safety programs and precludes state enforcement of OSHA standards unless the state has an OSHA-approved State Plan.

Nature's Capital is an Idaho-based business and works primarily in Idaho. To the extent that client operations may extend periodically into adjacent states, awareness of the health and safety programs of adjacent states is warranted. Table 1 provides a summary of the status of state plans for states adjacent to Idaho (contact information for Idaho is also shown). All states within the northwest region have OSHA-approved state plans with the exceptions of Idaho and Montana. This comprehensive health and safety program is intended to comply with OSHA and each OSHA-approved plan within the northwest states region. Nature's Capital employees shall not work in an adjacent state without authorization. Management shall ensure that Worker's Compensation Insurance coverage is in force prior to any employee working in an adjacent state.

Table 1. Summary of Northwest State Plans. The status of state plans of states adjacent to Idaho is list alphabetically by state with administrative agency contact information. Contact information for Idaho is also shown.

State	Year of Approval	Administrative Agency	Telephone Contact	Web Site URL
Idaho	No state plan	OSHA	208 321-2960	https://www.osha.gov/oshdir/id.html
Montana	No state plan	OSHA	406 247-7494	https://www.osha.gov/oshdir/mt.html
Nevada	2000 (final)	Nevada Occupational Safety and Health Administration (Nevada OSHA)	702 486-9020	http://dir.nv.gov/OSHA/Home/
Oregon	2005 (final)	Oregon Occupational Safety and Health Administration (OR-OSHA)	800 922-2689	http://www.orosha.org/
Utah	1985 (final)	Utah Occupational Safety and Health (UOSH)	801 530-6800	http://laborcommission.utah.gov/divisions/UOSH/
Washington	1982 (certified)	Division of Occupational Safety and Health (DOSH)	800 423-7233	http://www.lni.wa.gov/Safety/default.asp
Wyoming	1985 (final)	Wyoming Occupational Safety and Health Administration (Wyoming OSHA)	307 777-8650	http://wyomingworkforce.org/businesses/osha/

MANAGEMENT COMMITMENT AND EMPLOYEE INVOLVEMENT

Nature's Capital has a relatively flat organizational structure. The maximum number of organizational layers is five, consisting of: owner, project manager, field supervisor, team leader, and team member. Due to logistical considerations, this organizational hierarchy may be compressed into just two layers: supervisor and supervisee (that is, owner and team

member). The owner, project manager, field supervisor, and team leader serve as supervisor. The terms supervisor and manager are synonymous. The terms owner and management are synonymous. Depending on the context of use the company name, Nature's Capital, LLC (Nature's Capital) may be synonymous with management or may imply the total sum of all employees, management, and assets.

Management Responsibilities

1. Health and safety policy: Nature's Capital has established a health and safety policy as shown at the beginning of this document. The purpose of the policy statement is to establish the priority of health and safety relative to other organizational goals such as profitability, productivity, and quality. This policy shall be effectively communicated to supervisors and employees.
2. Health and safety line of supervision, delegation of authority, and responsibility for leadership: The health and safety of any employee is the responsibility of their direct supervisor and any manager with authority regarding the employee's work activities. Supervisors with responsibility for the health and safety of their employees are granted the necessary authority to stop hazardous work activities, enforce appropriate health and safety rules and discipline violators of those rules. Supervisors will lead by example and are required to abide by all safety provisions and rules established by or for the company and each work project area.
3. Health and safety staff lead: An employee will be delegated as health and safety staff leader. This employee will possess all necessary health and safety training and will serve as a resource for supervisors in their daily operations. The health and safety staff lead will assist in resolving health and safety issues and in the investigation of accidents.
4. Health and safety resources and training: Adequate resources will be available to implement the health and safety program, including but not limited to personnel, supplies, equipment, facilities, services and training. Adequate training is an essential necessity to any effective health and safety program. Without adequate knowledge, skill and information, management and employees cannot be expected to work in a healthy and safe manner. Therefore, Nature's Capital is committed to providing this necessary training.
5. Employee involvement and participation in health and safety issues, planning, and evaluation: Nature's Capital will actively seek employee input regarding health and safety policy, hazardous condition evaluation and resolution, training, and all aspects of the health and safety program.

Administration and Supervision

1. Health and safety responsibilities and accountability: Health and safety is everybody's responsibility. To maintain accountability, however, authority and responsibility is defined and delegated within each level of supervision. Clear and open communication regarding health and safety will prevail at all levels of organization within the company. Health and safety performance is an integral part of each employee's work

performance evaluation.

- a. Management: As stated in the previous section, is the responsibility of management to provide for the health, safety, and training of employees. Management will provide professional leadership and guidance to employees. All job/project hazard analyses will be approved by management and reviewed on a project basis or at least annually. Management will delegate the following tasks as needed:
 - i. Development of health and safety training programs.
 - ii. Inspections to identify unhealthy or unsafe conditions or work practices and completion of associated written reports of inspections.
 - iii. Maintenance of the state health and safety poster, emergency telephone numbers, OSHA Form 300, and other required.
 - iv. Maintenance of accident and incident investigation and reporting procedures and systems. Maintenance of all records and reports of training, accidents, or illnesses that have taken place during company operations. Investigation of serious or reportable accidents (fatalities, lost workday cases, and accidents that require medical treatment).
 - v. Report accidents that result in an occupational fatality or three or more hospitalized workers OSHA within eight (8) hours of occurrence.
 - vi. Assistance with the completion of state worker's compensation reporting.
- b. Project Leader: It is the responsibility of project leader to identify job-related hazards and to eliminate potential causes of accidents, injuries, and illnesses at worksites to the best of their ability by:
 - i. Considering an employee's identified personal, physical, and mental condition when assigning duties.
 - ii. Knowing the type of equipment being used and its limitations.
 - iii. Preparing a project hazard analysis with involved employees for each work project or activity.
 1. Employees may request review of a JHA with their supervisor at any time.
 - iv. Eliminating unacceptable risks by inspecting the work project or activity and by identifying, evaluating, correcting, and following up on recognized hazards.
 - v. Conducting onsite safety and health review sessions to emphasize precautions identified in the project hazard analysis.
 - vi. Making inquiries into all incidents, accidents, and injuries that they observe or that are reported to them; following through with the appropriate investigation procedures and corrective actions; and ensuring that all threats, assaults, intimidation, or other like acts are reported immediately to management.
- c. Team Leader: It is the responsibility of team leaders to:
 - i. Assist in the development of project hazard analyses.
 - ii. Distribute and balance workloads among their team members.
 - iii. Provide new team members with on-the-job training.
 - iv. Ensure team members engage in safe work practices.

- d. All Employees: It is the responsibility of all employees to:
 - i. Inform their supervisor of any personal, physical, or mental condition that could compromise the safety or health of the team or themselves.
 - ii. Comply with the job/project hazard analysis and the established safety and health procedures and practices.
 - iii. Take the initiative for their own safety and health, and that of their co-workers, by pointing out unsafe conditions and unsafe work practices and, immediately reporting any threats by persons against themselves or Nature's Capital to their supervisor or management.
 - iv. Use clear and open communication regarding all aspects of their work.
- 2. Correction of non-performance: Health and safety policies and practices are established to protect the welfare of each employee and the employees that they work with. Furthermore, a safe and healthy work environment contribute to greater job satisfaction and higher productivity. Observation of the company's health and safety program is a key performance evaluation factor.
 - a. Willful violation of the company's health and safety program will result in immediate termination of employment.
 - b. Failure to observe the company's health and safety program in less egregious circumstances will result in the following disciplinary progression:
 - i. Oral warning by the direct supervisor.
 - ii. Written warning and employment performance contract administrated by the owner and direct supervisor.
 - iii. Termination of employment.
 - c. Supervision may recommend, or management may decide (independent of supervisor recommendation), to escalate an incident to any level of this three-part disciplinary progression based on circumstances of the violation of the company's health and safety program.

Employee Participation

- 1. The company's health and safety program is open to review and discussion. Employees are encouraged to raise questions, concerns, or offer suggestions for improving the program. Positive employee involvement in issues related to health and safety contribute to the wellbeing of all employees, work satisfaction, and productivity. Positive participation in the health and safety program will be reflected in employee performance evaluations. Opportunities for involvement include but are not limited to:
 - a. Decision-making and planning
 - b. Allocation of health and safety resources
 - c. Health and safety training
 - d. Hazard detection, prevention, and control activities
 - e. Health and safety performance evaluations.

WORKSITE ANALYSIS

1. Health and safety goals and objectives: It is a goal of Nature's Capital to have an injury-free work environment. At a minimum, the company will maintain occupational injuries and illnesses to below the national Lost Workday Incidence (LWDI) average for our Standard Industrial Classification (SIC) code. This health and safety goals will be achieved by (1) comprehensive health and safety hazard inspections; (2) accident and incident investigations; and (3) adequate and necessary training for all managers, supervisors and employees. Incremental goals may be established using steps, milestones, or other progress points. As with objectives, action statements may incorporate SMART criteria (Specific, Measurable, Attainable, Relevant and Trackable) when appropriate.
2. Comprehensive health and safety survey: Qualified persons such as an OSHA consultant, private consultant, insurance loss control specialist, or appropriately trained and experienced Nature's Capital employee will conduct an annual comprehensive hazard survey.
 - a. During the annual comprehensive health and safety survey the operational effectiveness of applicable OSHA-mandated programs will be evaluated.
 - b. An annual audit of the company's health and safety system will be conducted by management.
3. Regular health and safety self-inspections: Nature's Capital will conduct periodic inspections of office and field project work environments for compliance with health and safety rules. The purpose of the in-house inspection is to identify hazards and unsafe practices before they cause an injury or accident.
 - a. Health and safety inspections will be conducted under the following minimum timelines:
 - i. Management will inspect all fixed facilities quarterly.
 - ii. Supervisors will inspect their areas of responsibility at least weekly and more frequently as project activities require.
 - b. After completing work environment inspections, the responsible person will:
 - i. Discuss findings with staff and management.
 - ii. Ensure recommended changes and other actions necessary to remove or control the hazard are implemented.
 - iii. Provide documentation to management regarding the corrective actions taken and still required.
 - c. The company's health and safety program will be reviewed at least annually.
4. Surveillance of established hazard controls: Surveillance for workplace hazards shall be a constant and on-going process. Daily surveillance by supervisors and employees is necessary for the elimination of hazards before an accident or incident occurs.
5. Hazard reporting system: It is everyone's responsibility to identify, report, and correct, possible hazards. Employees are particularly important in this process as they are in the best position to identify hazards in the workplace and day-to-day operations. Reporting hazards is a protected activity and no action will be taken against anyone for identifying unsafe conditions. Rather, this is encouraged and will reflect positively on performance. Reports of hazardous work conditions will be made to the direct supervisor and management for appropriate action.

6. Change analysis: All levels of the organization will be responsible for planning activities involving health and safety aspects of changes in facilities, equipment, materials, or processes. Planning procedures will ensure the health and safety input of appropriate personnel, especially those affected by the changes. This is particularly necessary for new activities or processes.
7. Accident and incident investigation: Accidents involving personal injury or property damage will be investigated. This investigation will be conducted by management and include the injured employee, immediate supervisor, witnesses and (optionally) an ad hoc safety committee. Results of the accident investigation will be documented to (1) determination of the cause and (2) recommendations to prevent another similar accident.
 - a. A health and safety incident is a "near miss" event in which no personal injury or property damage occurs. Employees are required to report health and safety incidences. Reported incidents will be investigated as though they were accidents.
 - b. Record of all recordable accidents, (near miss) incidences, and occupational illnesses will be maintained for each work location using OSHA Form 300 (or similar). Workplace health and safety incident, injury, and illness data will be evaluated and analyzed to enumerate the type, to detect time trends and spatial patterns, and to determine proportional distributions among operations and personnel. Results of these analyses are useful in detecting hazards and setting priorities for hazard corrections.
8. Hazard Communication: A current Safety Data Sheet (SDS) (formerly known as material safety data sheet [MSDS]) for each chemical product used in office and field work environments will be kept on file, reviewed, and evaluated to assist in the prevention, elimination, or control of hazards posed by these chemical products. The hazards identified on the SDS shall be controlled by the hierarchy of engineering controls, administrative controls and lastly, personal protective equipment.
 - a. All chemical products used by Nature's Capital will be labeled in accordance to the OSHA Hazard Communication Standard.
9. Job hazard analysis: The job hazard analysis (JHA) is developed to ensure safety and health by clearly assigning responsibility and accountability to employees, first-line supervisors, and line officers. JHA is a formal technique for detecting hazards associated with specific work activities, whether in the field or office work environment. The objective of the JHA is to carefully study each step of a work activity, identify existing or potential hazards associated with each step, and determine the best way to perform the activity to reduce or eliminate these hazards.
 - a. The annual comprehensive health and safety survey (Item 1, above) will incorporate a JHA of ongoing work activities.
 - b. A JHA will be completed for every project. The results will be fully considered in the project budget prior to submitting a proposal, estimate, or bid.
 - c. Nature's Capital will only accept contracts that have incorporated written allowances for newly discovered hazardous work conditions or environments.
 - d. Nature's Capital may employ expert hazard analyses to assist in the identification, elimination, or control of hazardous work conditions or environments.

HAZARD PREVENTION AND CONTROL

1. Hierarchy of hazard controls: Hazards identified during hazard identification and assessment procedures will be controlled by the hierarchy of (1) engineering controls, (2) administrative controls, and (3) personal protective equipment. Even though engineering controls may not eliminate the hazard, engineering controls will be implemented to the full extent feasible.
2. Health and safety standard practices: Nature's Capital has developed health and safety standard practices which are shown Appendix A of this document so named. These standard practices are established as minimal operating procedures. Failure to comply with these standards will result in employee disciplinary action. All employees shall be instructed in these requirements prior to any relevant work activity.
3. Applicable OSHA-mandated programs: Any mandated program that is applicable to the operations of Nature's Capital will be developed and implemented. These programs include, but are not limited to: Hazard Communication Standard, Personal Protective Equipment, Respiratory Protection Standard, and Exposure Control Plan. (Note: Nature's Capital employees are prohibited from work environments defined as confined space and prohibited from servicing or maintaining machines or equipment for which unexpected energization or startup of the machines or equipment, or release of stored energy, could harm employees.)
4. Personal protective equipment: Nature's Capital has conducted job hazard analyses that assist in the identification of required personal protective equipment (PPE) for operations of the company. The company will train, and each employee is required to know (in relation to their assigned work duties) the following:
 - a. When PPE is necessary.
 - b. What kind of PPE is necessary.
 - c. How to properly put on, adjust, wear, and take off required PPE.
 - d. The limitation of the equipment.
 - e. Proper care, maintenance, useful life, and disposal of required PPE.
5. Housekeeping: The appearance of office and camp facilities as maintained with proper housekeeping is indicative of the overall health and safety program. Housekeeping requirements are defined in the company's health and safety standard practices (Appendix A).
6. Emergencies: Nature's Capital has planned and prepared for reasonably anticipated emergency situations. Emergency situations include fire, natural disasters known to the area, catastrophic failures in the company or neighboring facilities, workplace violence, and terrorist acts.
7. Emergency medical care: The company's office work environment and the surrounding area has emergency medical and rescue services available by dialing 911. Minor injuries may be treated at the office first aid station. Field projects typically occur in remote locations where there are no emergency medical or rescue services within a reasonable distance or response time.
 - a. All employees are required to be trained in basic first aid and cardiopulmonary resuscitation (CPR).
 - b. Current and verifiable certification of first aid training is a condition of employment with the company.

- c. Field employees are required additional emergency medical care training based on their assigned work location and duties.
 - d. The company has defined emergency medical care qualifications in standard practices for travel.
- 8. Preventive maintenance program: Preventive maintenance is important because equipment failures can cause accidents, injure employees, damage property, and cause work activity delays. Preventive maintenance consists of following the manufacturer's recommendations, performing scheduled maintenance and responding to employees' concerns and repair requests. Defective equipment will be placed out of service when appropriate.
- 9. Tracking hazard corrections: All hazards identified through inspections, job surveillance, or employee concerns will be documented and tracked to verify corrective actions are completed. All scheduled maintenance activities and repair orders will be documented and tracked to verify completion of corrective action. Corrective actions will be completed in a timely manner. Corrective actions taking 30 days or longer will be reviewed by management.
- 10. Drug-Free Workplace:
 - a. The unlawful use, possession, transfer, or sale of illegal drugs or controlled substances and the misuse of alcohol by employees during work hours are prohibited.
 - b. The consequences for violation of the drug-free policy may include, but are not limited to, a referral for therapeutic help, discipline, or termination.
 - c. A list of community resources that provide substance abuse treatment and prevention services is posted at the bulletin board where they may be regularly viewed by employees. The Department of Health also provides information on their website, or may be contacted directly.
 - d. Nature's Capital is a smoke-free workplace, including office and field work environments.

HEALTH AND SAFETY TRAINING

1. Health and safety training: Education and training are essential for maintaining a safe and healthy work environment. Knowledge of the health and safety standards and how and when to function under these standards necessary to maintain a healthy and safe work environment. Employees shall receive appropriate training and continuing education for the knowledge, skill, and information necessary to conduct all work activities in a safe and healthy manner prior to exposure to hazardous conditions. This training may be formal or informal, including on-the-job training by supervisors. Various individual OSHA health and safety programs specify that training be provided to employees. Supervisors will ensure their employees are scheduled and provided this training as required. Examples of specified training include (but not limited to): fire extinguisher training and hazard communication.
2. Employee orientation: New employees will receive an initial health and safety orientation. This orientation will consist of at least announced health and safety policy, general health and safety standard practices, major hazards and protections, and

emergency procedures. Re-orientation may be necessary when an employee changes job duties, if the change involves significant new hazards, protections, or emergency procedures.

3. Supervisor health and safety training: First-line supervisors are close to the work and have direct responsibility for personnel doing the work. The first prerequisite for effective health and safety supervision is an understanding of the hazards, protections, and emergency procedures associated with the supervised work.
 - a. In addition to hazard awareness, recognition and controls, supervisors need to be able to train and motivate their subordinates to recognize the hazards, use the protective measures, and follow the emergency procedures. Supervisory effectiveness is key to health and safety performance. Supervisors may need coaching or specialized training to acquire these supervisory skills.
 - b. Supervisors lead by example. Therefore they must at least be trained to provide for their personal health and safety. Supervisors will be trained to exercise leadership roles regarding health and safety issues throughout the workplace.
 - c. Managers must understand both the way and extent to which effective health and safety protection impacts the overall effectiveness of the business. Accidents and injuries cost money and affect the company's bottom line. Managers who understand this are far more likely to ensure that the health and safety management system operates as needed.

APPENDIX A: HEALTH AND SAFETY STANDARD PRACTICES