

| | | |
|-------------------------|-------------------------|--------------|
| Version: 24.0 | Warehouse Safety | |
| | Effective Date | May 21, 2024 |
| | Page | 1 of 7 |

Brunel Energy, Inc.

Warehouse Safety

Contents

| | |
|------------------------|---|
| 1. Purpose | 2 |
| 2. Applicability | 2 |
| 3. Requirements | 2 |
| 4. Reference | 7 |

| | | |
|-------------------------|-------------------------|--------------|
| Version: 24.0 | Warehouse Safety | |
| | Effective Date | May 21, 2024 |
| | Page | 2 of 7 |

1. Purpose

- 1.1. Brunel Energy, Inc., hereinafter referred to as, “the Company,” has established a Warehouse Safety Program compliant with OSHA standards.

2. Applicability

- 2.1. This policy applies to employees, subcontractors and/or visitor(s) of the Company. For the purposes of this policy, an employee shall be considered on the job whenever he/she is:
 - 2.1.1. On or in, any Company or client property, including parking areas; or
 - 2.1.2. On Company time even if off Company premises (including paid lunch, rest periods and periods of being on call).
- 2.2. As a condition of employment, Company employees are required to abide by additional governmental or customer policies and requirements that may be imposed at a worksite in addition to the requirements of these policies and procedures. Nothing set forth in this policy constitutes, construes, or interprets in any way as a contract of employment.

3. Requirements

- 3.1. Warehouse operations can present a wide variety of potential hazards for the worker. For warehousing establishments, the 10 OSHA standards most frequently included in the agency’s citations were:
 - Forklifts
 - Hazard communication
 - Electrical, wiring methods
 - Electrical, system design
 - Guarding floor & wall openings and holes
 - Exits
 - Mechanical power transmission
 - Respiratory protection
 - Lockout/tagout
 - Portable fire extinguishers
- 3.2. More than 145,000 people work in over 7,000 warehouses. The fatal injury rate for the warehousing industry is higher than the national average for all industries. Potential hazards for workers in warehousing are:
 - Unsafe use of forklifts;
 - Improper stacking of products;

| | | |
|-------------------------|-------------------------|--------------|
| Version: 24.0 | Warehouse Safety | |
| | Effective Date | May 21, 2024 |
| | Page | 3 of 7 |

- Failure to use proper personal protective equipment;
- Failure to follow proper lockout/tagout procedures;
- Inadequate fire safety provisions;
- Repetitive motion injuries

3.3. The following are guidelines for various types of hazards in warehouses:

3.3.1. General Safety

- 3.3.1.1. Exposed or open loading dock doors and other areas that employees could fall 4 feet or more or walk off should be chained off, roped off or otherwise blocked.
- 3.3.1.2. Floors and aisles are clear of clutter, electrical cords, hoses, spills, and other hazards that could cause employees to slip, trip or fall.
- 3.3.1.3. Proper work practices are factored into determining the time requirements for an employee to perform a task.
- 3.3.1.4. Employees performing physical work have adequate periodic rest breaks to avoid fatigue levels that could result in greater risk of accidents and reduced quality of work.
- 3.3.1.5. Newly hired employees receive general ergonomics training and task-specific training.
- 3.3.1.6. The warehouse is well ventilated.
- 3.3.1.7. Employees are instructed on how to avoid heat stress in hot, humid environments.
- 3.3.1.8. Employees are instructed on how to work in cold environments.
- 3.3.1.9. The facility has lockout/tagout procedures.
- 3.3.1.10. Smoking is not permitted in warehouses or production facilities. Smoking is permitted only during lunch breaks and only in designated areas.
- 3.3.1.11. Gasoline and any other highly volatile material must not be stored in a warehouse unless in an approved UL or FM safety can.
- 3.3.1.12. Allowable floor or platform loading must be determined by authorized professional personnel. Do not exceed loads that are posted or otherwise stated. Do not exceed Occupational Safety and Health Administration (OSHA) safe loading limit requirements. If you are unsure of the loading capacity of an area of the warehouse floor or a platform, ask your supervisor for directions.
- 3.3.1.13. A nonskid surface should be provided on ramps and walkways where there is danger of slipping.

| | | |
|-------------------------|-------------------------|--------------|
| Version: 24.0 | Warehouse Safety | |
| | Effective Date | May 21, 2024 |
| | Page | 4 of 7 |

- 3.4. Material Storage: All storage areas must be kept free of materials that can cause tripping, fire, explosion, or pest harborage. Aisles, stairways, walkways, and loading platforms must also be kept free of such materials.
- 3.4.1. Do not overload shelves. Periodically inspect shelves for strength.
 - 3.4.2. Bins and racks should be spaced and located to allow safe access to material.
 - 3.4.3. Make provisions for safe access to material on high shelves.
 - 3.4.4. Stack loads evenly and straight;
 - 3.4.5. Place heavier loads on lower or middle shelves;
 - 3.4.6. Remove one object at a time from shelves;
 - 3.4.7. Keep aisles and passageways clear and in good repair.
- 3.5. Forklift Safety - Train, evaluate and certify all operators to ensure that they can operate forklifts safely.
- 3.5.1. Do not allow anyone under 18 years old to operate a forklift;
 - 3.5.2. Properly maintain haulage equipment, including tires;
 - 3.5.3. Before using a forklift, examine it for hazardous conditions which would make it unsafe to operate.
 - 3.5.4. Follow safe procedures for picking up, putting down and stacking loads;
 - 3.5.5. Drive safely, never exceeding 5 mph and slowdown in congested areas or those with slippery surfaces;
 - 3.5.6. Refresher training and evaluation is conducted whenever an operator has been observed operating the vehicle in an unsafe manner or has been involved in an accident or a near-miss incident.
 - 3.5.7. Refresher training and evaluation is conducted whenever an operator is assigned to drive a different type of truck or whenever a condition in the workplace changes in a manner that could affect safe operation of the truck.
 - 3.5.8. Evaluations of each operator's performance are conducted at least once every three years.
- 3.6. Dock Safety
- 3.6.1. Injuries happen here when forklifts run off the dock, products fall on employees or equipment strikes a person.
 - 3.6.2. Drive forklifts slowly on docks and dock plates
 - 3.6.3. Secure dock plates and check to see if the plate can safely support the load.
 - 3.6.4. Keep clear of dock edges and never back up forklifts to the dock's edge.
 - 3.6.5. Provide visual warnings near dock edges;
 - 3.6.6. Prohibit "dock jumping" by employees;

| | | |
|-------------------------|-------------------------|--------------|
| Version: 24.0 | Warehouse Safety | |
| | Effective Date | May 21, 2024 |
| | Page | 5 of 7 |

- 3.6.7. Make sure that dock ladders and stairs meet OSHA specifications.
- 3.7. Conveyors
 - 3.7.1. Inspect conveyors regularly;
 - 3.7.2. Ensure that pinch points are adequately guarded;
 - 3.7.3. Develop ways of locking out conveyors and train employees in these procedures;
 - 3.7.4. Provide proper lighting and working surfaces in the area surrounding the conveyor.
- 3.8. Manual Lifting / Handling - Back injuries may occur from improper lifting or overexertion.
 - 3.8.1. Provide general ergonomics training and task-specific training;
 - 3.8.2. Minimize the need for lifting by using good design and engineering techniques;
 - 3.8.3. Lift properly and get a coworker to help if a product is too heavy.
- 3.9. Poor Ergonomics - Improper lifting, repetitive motion or poor design of operations can lead to musculoskeletal disorders in workers.
 - 3.9.1. If possible, use powered equipment instead of requiring a manual lift for heavy materials;
 - 3.9.2. Reduce lifts from shoulder height and from floor height by repositioning the shelf or bin;
 - 3.9.3. Ensure overhead lighting is adequate for the task at hand;
 - 3.9.4. Provide employees with task-oriented ergonomic training;
 - 3.9.5. Use your legs and keep your back in a natural position while lifting;
 - 3.9.6. Test the load to be lifted to estimate its weight, size, and bulk, and to determine the proper lifting method;
 - 3.9.7. Get help if the load exceeds the maximum weight a person can lift safely without assistance;
 - 3.9.8. Don't twist while carrying a load, but shift your feet and take small steps in the direction you want to turn;
 - 3.9.9. Keep floors clean and free of slips and trip hazards.
- 3.10. Charging Stations - Fires and explosion risks are possible unless proper guidelines are followed.
 - 3.10.1. Prohibit smoking and open flames in and around charging stations;
 - 3.10.2. Provide adequate ventilation to disperse fumes from gassing batteries;
 - 3.10.3. Ensure that fire extinguishers are available and fully charged;
 - 3.10.4. Provide proper personal protective equipment such as rubber gloves and eye and face protection;

| | | |
|-------------------------|-------------------------|--------------|
| Version: 24.0 | Warehouse Safety | |
| | Effective Date | May 21, 2024 |
| | Page | 6 of 7 |

- 3.10.5. Properly position forklifts and apply brakes before attempting to change or charge batteries; follow required procedures when refueling gas or propane fueled forklifts;
- 3.10.6. Provide conveyors, overhead hoists, or equivalent materials handling equipment for servicing batteries;
- 3.10.7. Provide an eye washing and safety shower facility for employees exposed to battery acids.
- 3.11. Fire Safety/Emergency Plans:
 - 3.11.1. Employers should have an emergency plan that describes what is expected of employees in the event of an emergency, including:
 - 3.11.2. Provisions for emergency exit locations and evacuation procedures;
 - 3.11.3. Procedures for accounting for all employees and visitors;
 - 3.11.4. Location and use of fire extinguishers and other emergency equipment.
 - 3.11.5. Warehouse operations need a lockout/tagout program to prevent equipment from being accidentally energized and injuring employees.
 - 3.11.6. Employees required to perform these operations should be trained and all employees should have a working knowledge of the program.
 - 3.11.7. Finally, management at warehouse operations needs to conduct a site hazard assessment to determine what personal protective equipment (PPE) must be worn based on the hazards present and train warehouse employees on proper PPE selection, use and maintenance.
- 3.12. Hazard Communication Safety
 - 3.12.1. All hazardous materials containers are properly labeled, indicating the chemical's identity, the manufacturer's name and address, and appropriate hazard warnings.
 - 3.12.2. There is an updated list of hazardous chemicals.
 - 3.12.3. Maintain a written program that covers hazard determination, including Safety Data Sheets (SDSs) for each chemical to which workers are exposed.
 - 3.12.4. There is a system to check that each incoming chemical is accompanied by an SDS.
 - 3.12.5. All employees are trained in the requirements of the hazard communication standard, the risks, and chemical hazards to which they are exposed, how to read and understand a SDS and chemical labels, and on what precautions to take to prevent exposure and follow instructions on SDS for handling chemicals.
 - 3.12.6. All employee training is documented.
 - 3.12.7. Provide spill cleanup kits in any area where chemicals are stored.
 - 3.12.8. Have a written spill control plan.

| | | |
|-------------------------|-------------------------|--------------|
| Version: 24.0 | Warehouse Safety | |
| | Effective Date | May 21, 2024 |
| | Page | 7 of 7 |

- 3.12.9. All outside contractors are given a complete list of chemical products, hazards, and precautions.
- 3.12.10. Procedures have been established to maintain and evaluate the effectiveness of the current program.
- 3.12.11. Provide proper personal protective equipment when handling chemicals and enforce its use.
- 3.12.12. All chemicals are stored according to the manufacturer's recommendations and local or national fire codes and away from forklift traffic areas.
- 3.12.13. Train employees to clean up spills, protect themselves and properly dispose of used materials.

4. Reference

- a. 1910.22 - General requirements.