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|  | Disciplinary Policy | | | | |
| Control number: | HSE-P-9 | Revision date: | 8/15/2024 | Rev #: | 0 |
| Approved by: | Derrick Landry | Revised by: | Madison Myers | MOC#: | N/A |

PURPOSE


The purpose of this program is to establish Peak NDT Solutions written Disciplinary Policy.

1.0 GENERAL

- A. Peak NDT Solutions strives to create a safe and productive work environment. This disciplinary program does not exist primarily to punish employees, but rather to control the work environment so that workers are protected and accidents are prevented. This policy outlines the responsibilities of Company employees and management with regard to safety and addresses the disciplinary actions that will be taken in the event that safety policies are violated.
- B. In order to ensure that Peak NDT Solutions safe working practices are taken seriously by employees and are actually followed, Company managers and supervisors will always be on the lookout for safety violations and will consistently enforce Peak NDT Solutions commitment to safety. Furthermore, it is the responsibility of Peak NDT Solutions HSE Manager and top-level Managers to verify that Supervisors and Foremen are demonstrating a commitment to their role in the Safety Program. The same level of disciplinary actions should be taken at the supervisory level if violations are indicated.
- C. It is the duty of each and every employee to know Peak NDT Solutions safety procedures and to conduct his or her work in compliance thereof. Any disregard of safety procedures shall be grounds for disciplinary action up to and including termination. It is the duty of each employee to make full use of the safeguards provided for their protection. Every employee will receive an orientation when hired and be informed of safety requirements contained in the written safety programs.

2.0 RESPONSIBILITIES

- A. The Safety Manager is responsible for the following:
 - Establishing safety goals and objectives;
 - Providing a written Safety, Health, and Environmental Program;
 - Coordinating employee safety training and conducting safety meetings;

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- Following up on recommendations and suggestions made at safety meetings;
- Addressing all hazards or potential hazards as needed;
- Completing accident investigations;
- Being familiar with OSHA, BSEE, and other local and state safety regulations;
- Maintaining an adequate stock of first aid supplies and other safety equipment to ensure their immediate availability, and to make sure that there are an adequate number of qualified first aid providers on the job.

B. Company Managers & Supervisors shall be responsible for the enforcement HSE policies and procedures as well as enforcement of Peak NDT Solutions disciplinary program including but not limited to the following:

- Establishing an atmosphere which ensures that safety is managed with the same emphasis as all other aspects of Company operations;
- Defining the responsibilities for safety and health of all subordinates and holding each person accountable for their actions through appraisals, and where necessary, disciplinary procedures;
- Regularly emphasizing that accident prevention and working safely are a condition of employment;
- Identifying operating oversights that contribute to accidents and could result in injuries and property damage;
- Pro-active participation in Company safety goals and initiatives including documentation of periodic safety audits, inspections and attendance at weekly safety meetings to ensure compliance with safety policies and procedures;
- Spending time with each person hired explaining safety procedures and the hazards of the employee's work;
- Making sure that if a job situation poses an unusual hazard, a trained person will be on hand to oversee others in completing the job;
- Enforcing safety rules consistently and following established discipline/enforcement procedures.

C. Company Employees are responsible for the following:

- Read, understand, and follow Safety Policy rules and procedures;
- Suitable work clothes are required and will be clearly defined;

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- Employees observed working in a manner which might cause injury to either themselves or other workers shall be warned of the danger and will immediately correct their method of operation;
- Report all injuries, no matter how slight, to their supervisor immediately, and seek treatment promptly;

- Be aware of the location of first-aid supplies, eye wash area, fire fighting equipment, and other safety devices;
- Attend all required safety and health meetings;
- Until they are properly trained, employees are not to perform potentially hazardous tasks, or to use any hazardous material. Employees are to follow all procedures when performing those tasks;
- Wear Personal Protective Equipment (PPE) at all times when working in areas where PPE is required.

3.0 DISCIPLINE & ENFORCEMENT

- A. All employees must understand and follow the established Safety Procedures in order for the program to be successful. When an employee has been adequately trained in these safety rules, but chooses not to follow them, management, upon notice of the infraction, must take whatever steps are appropriate under the circumstances to deal with the situation. Corrective actions shall be taken to address violations of the safety rules for all employees. Corrective actions will be taken to address other inappropriate behaviors and actions pertaining to Safety, Environmental, and Quality Assurance issues. When a violation pertains to a Manager or Supervisor, a senior member of the management team shall investigate and document the infraction and enforce the same disciplinary action as with other employees.

- B. The following steps will be taken in order to address violations to Safety, Health, and Environmental procedures:
 - The employee will meet with the HSE Manager and his/her Supervisor to discuss the infraction & inform employee of the rule or procedure that was violated and the corrective action to be taken.
 - A Disciplinary Warning Notice "Write-Up" will be completed and signed, and copies of the notice will be retained in the employees personnel file. The extent of the disciplinary action taken will be determined based on the seriousness of the infraction. In some cases, no further action beyond the "write-up" will be necessary. In

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other cases, at the discretion of the HSE Manager and the employees' Supervisor, the employee may be suspended for up to five days without pay. Finally, if Company Management decides that the infraction warrants it, the employee may be terminated from employment. Disciplinary action which includes termination may also be enforced for employees who continue to violate the policy.

- Violation may be anonymously discussed at Safety Meetings.

C. The following shall constitute a safety violation:

- Failure to wear selected PPE or abuse of selected PPE;
- Not following verbal or written safety procedures and/or guidelines;
- Failure to report an accident to an immediate supervisor upon being injured;
- Fighting, horseplay or other disruptive activities on Company or Customer premises or while on duty;
- Violation of Peak NDT Solutions Substance Abuse Policy and/or related safety rules;
- Possession of weapons, firearms or ammunition while on Company premises, in Company vehicles or at customer facilities.

REVISION INFORMATION

This is applicable to changes made to the current version of the preceding document.

| Revision Number | Description |
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