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DISCOUNT TIRE COMPANY OF MINNESOTA

A.W.A.I.R A Workplace Accident and Injury Reduction Program

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Introduction

A Workplace Accident and Injury Reduction (AWAIR) program is designed to reduce the incidence of workplace accidents, injuries, and illnesses. This Program shall include roles and responsibilities, procedures for recognizing and controlling hazards and accident investigation as well as communication.

1.1 Regulatory and Contractual Requirements

AWAIR requirements are established in the Minnesota OSHA statute 182.653, subd. 8 and Minnesota Rules., Chapter 5208.

1.2 Program Administration

The Company shall develop and maintain an AWAIR program. The person responsible for the implementation of this AWAIR program is the Minnesota Regional Vice-President.

The written safety and health (AWAIR) program shall include:

- A list of managers, supervisors, and/or staff, who are responsible for implementing the AWAIR program and how continued participation of management shall be established, measured and maintained
- Methods used to identify, analyze and control new or existing hazards, conditions, and operations
- A written explanation of how the plan shall be communicated to all affected staff so that they are informed of work-related hazards and controls
- A written explanation of how workplace accidents shall be investigated and corrective actions implemented
- A written explanation of how safe work practices and rules will be enforced
- The Company will conduct and document a review of the AWAIR program at least annually

Company Safety Goals and Objectives

1.3 AWAIR Goals

- Provide a safe and healthful workplace
- Reduce the frequency of work-related accidents
- Reduce the severity of work-related accidents
- Comply with state and federal OSHA standards

1.3..1 **Goal**

1. Meet or exceed 85% Safety Engagement for 2023

1.3..2 **Objectives**

1. We will Observe and Coach Safe Behaviors to prevent injuries
2. We will Improve safety engagement reporting

1.3..3 **Process**

1. Review engagement scores
2. Review incident reporting program
3. Review the program annually and build on successes and improve weaknesses

Roles and Responsibilities

All responsibilities will be clearly communicated and understood. No person should be held responsible for performing a function unless that person also has the authority to accomplish it.

2.1 Representation

The Safety Team is represented by all company locations.

2.2 Organizational Structure and Selection

The Safety Team establishes a structured direct communication channel from all company employees and locations to the company CEO.

Safety Team Member

The Safety Team Member is responsible for assisting the Safety leader with daily safety activities and observations. The Safety Team Member is an extension of the Safety Leaders eyes and ears.

- Safety Team Members should be trained up to Service Coordinator but exceptions will be made for employees that show an interest in fulfilling the role.
- STM's are chosen by the Store Manager and Safety Leader.
- STM's receive education through the National Safety Council and OJT.

Safety Leader

Safety Leaders are responsible for the Promotion, Assurance and Sustainment of Safety at their location. The Safety Leader is the voice for his/her people. The Safety Leader is responsible for relaying all reportable incidents, close calls and compliance issues as well as any questions, comments, concerns or ideas that the location may have to their Sr. Safety Leader.

The Safety Leader is also responsible for relaying any significant safety information back to his/her people, making CTA commitments and identifying hazards.

- Safety Leaders are selected based on their organizational designation as a Sr. Assistant Manager
- Safety Leaders are educated in basic safety concepts and regulatory compliance through National Safety Council training
- If a location has more than one Sr. Assistant Manager only one Sr. will represent the location as the Safety Leader.
- An alternate (Safety Team Member) from the location should be chosen to sit in for the Safety Leader in his/her absence.

- Reports to
 - Sr. Safety Leader
 - Manager

Sr. Safety Leader

Sr. Safety Leaders are responsible for facilitating conference calls with all Safety Leaders their AVP oversees. The Sr. Safety Leader Facilitates the conference call using a form that captures attendance and presents questions around reportable incidents, close calls, compliance issues, questions, comments, concerns and ideas. The SSL is the subject matter expert for explaining CTA items and identifying trends in hazard among his/her Safety Leaders.

The Sr. Safety Leader reports on Key Performance Indicators of the system.

- Requires 5 years of store experience
- Sr. Safety Leaders receive the same education as a Safety Leader through NSC as well as the opportunity to earn their OSHA 10hr certificate.
- One Sr. Safety Leader will be selected per Regional Assistant Vice President and represents all locations that the AVP oversees.
- Reports to
 - Regional Safety Coordinator
 - Assistant Vice President

Regional Safety Coordinator

Regional Safety Coordinators are responsible for communicating with Sr. Safety Leaders, aggregating information generated from conference calls and reporting the information to all Managers and Executive Staff, typically accomplished at a Managers meeting. The RSC is then responsible for completing a monthly safety report and submitting it to the Safety Department.

- Requires 10 years of store experience and a proven focus on safety.
- The Regional Safety Coordinator will receive training through NSC as well as the opportunity to earn his/her OSHA 30hr certificate.
- One Regional Safety Coordinator will be selected per region.
- The role of Regional Safety Coordinator is held by a Manager level representative and is chosen by the Safety Department through a formal application and interview process.
- Reports to Sr. Safety Specialist

Vice President - EHSQ

The VP of EHSQ is responsible for the overall health of the communication structure. The VP EHS will conduct a webinar for all Regional Safety Coordinators.

- One VP EHSQ will be selected through a standard application and interview process (see VP EHSQ job description)
- Reports to RMOQ SVP

*Any exceptions or deviation from the organizational structure or selection criteria will be considered by the Safety Department on a case by case basis.

Hazard Identification and Control

2.3 Hazard Identification

The following methods will be used to identify hazards in the workplace

1.6.1 Job hazard analysis

- Performed on routine tasks in the workplace
- A job hazard analysis shall be reviewed when a new job task or piece of equipment is introduced or a current task has undergone changes in process or procedure.

1.6.2 Review of OSHA 300 Log

- Every year between February 1st and April 30th the OSHA 300 Summary shall be reviewed and discussed by every Minnesota location.

1.6.3 Incident Management System

- The Company shall use the incident management software, to aid in incident reporting and data management to identify trends and highlight common hazards

1.6.4 Store Safety Inspection

- Safety Inspections will be completed to identify and abate hazards

1.6.5 Immediate Action Messages

- In the event life, limb or eyesight of our employees is at risk

2.4 Hazard Control

Based on the frequency and severity of identified hazards an analysis using the Risk Assessment Template shall be conducted to identify methods to eliminate or control hazards to a feasible degree. The hierarchy of controls shall be utilized in this process.

- Always consider engineering controls first
- When engineering controls are not feasible, administrative controls shall be implemented
- PPE shall be utilized after all feasible engineering controls, administrative controls and work practices have been implemented
- The Company shall use the incident management software, Riskconnect to issue and track corrective actions

Communication & Training

2.5 Training

All employees covered by this program shall receive training on their rights and responsibilities as they pertain to the program, including but not limited to:

- The company's safe working practices and procedures
- Where to find specific information about the program
- Communicate safety concerns and make safety recommendations
- Responsibilities within the company's safety program

Training shall be completed before employees are allowed to perform work-related tasks, and when the program changes.

2.6 Communication

Communication of the program shall be accomplished using multiple types of media and channels such as:

- The Safety Focus
- Special Safety Focus
- Best Practice Awareness vignettes
- Safety Posters
- Immediate action messages
- Company safety contacts and quick links
- Conference Calls
- Safety Reporting

Accident Investigation

The goal of accident investigation at the company is to ensure that all incidents and near misses are reported immediately and investigated to the fullest extent possible. Effective implementation of this program will address our employees medical needs, identify corrective actions, and prevent recurrence.

2.7 Incident/Accident Reporting

The Company requires that all workplace incidents and near misses be reported immediately by the employee to their Store Manager/Sr. Assistant Manager. The Safety Leader will complete a claim report by the close of business on the day the incident is reported, or in the event of a serious injury, when they are physically able.

2.8 Incident Classifications

2.8..1 **Extreme Risk Incident**

A fatality, serious injury, damage to equipment, materials, environment or property or the potential exists for the aforementioned.

2.8..2 **High Risk Incident**

A lost-time injury requiring medical aid treatment, damage to equipment, materials, environment or property or the potential exists for the aforementioned.

2.8..3 **Medium Risk**

Injuries requiring medical treatment which do not result in lost time, damage to equipment, materials, environment or property or the potential exists for the aforementioned.

2.8..4 **Low Risk Incident**

First aid cases and near misses where the incident did not cause a more serious injury or accident and there was limited probability of the aforementioned.

2.9 Investigation

The main objective for an accident investigation is to identify the root cause(s) of the incident and develop the corrective actions to prevent the recurrence of the incident. Incidents shall be investigated as soon as possible.

The actual procedures used in a particular investigation depend on the nature and results of the accident. The steps taken to conduct an investigation in order to reach the objective are:

- Collect the appropriate incident information
- Enter information into the claims management system
- Incident reviewed by the Safety Department
- Further investigation including root cause analysis is performed as required

2.9.1 Investigation Types

- Site Visit
- Phone Conference
- Desk Call
- Data Research

Any one or combination of the above methods may be used for the purpose of gathering information.

2.10 Final Report/ Corrective Actions

Following an investigation and analysis, a summary report shall be prepared, including the recommended actions to prevent reoccurrence. Report details will consist of submissions entered for incidents which includes, but is not limited to:

- Date, Time (of incident), Location
- Injured Party/parties
- Witnesses (Name, Address, Phone Number, etc.)
- Witness statements
- Medical Treatment Information (Name [of Physician], Address [of medical facility], Phone Number, etc.)
- Accident description – sequence of events (5W's)

- Description of any equipment/tool(s) involved
- Description of any vehicle(s) involved
- Diagrams and photos

All recommendations and corrective actions will be tracked to completion by the Safety Department.

Enforcement of the AWAIR Program

Enforcement of the AWAIR program and safety and health rules shall follow The Company's existing discipline procedures as follows:

The Company does not have a formal progressive discipline policy requiring a set number of warnings or counseling sessions. Instead, each case is considered based on its own facts. In the case of misconduct or violation of The Companies policies, practices or procedures, immediate termination may be appropriate depending on the facts. Discount may also exercise its discretion to utilize forms of discipline that are less severe than termination. Examples of less severe forms of discipline include verbal warnings, written warnings, demotions and suspensions (see appendix).

AWAIR Program Review

The AWAIR program shall be reviewed annually by the Safety Department to determine if goals were met and if the implementation was effective. All findings shall be documented and the Program shall be revised as needed (see Roles and Responsibilities for specific information about who does the review). A PDCA form will be used to address and correct program deficiencies.

1. Have we met our goals and why/why not?
2. Have we met our objectives and why/why not?
3. Specific issues to address with the AWAIR Program
4. Specific positive aspects of the AWAIR Program
5. Overall program success

Appendix A Employee Consultation Form

Employee Consultation Form

EMPLOYEE INFORMATION

EMPLOYEE NAME: _____

RANK: _____

STORE MANAGER: _____

HIRE DATE: _____

TODAY'S DATE: _____

STORE #: _____

CONSULTATION INFORMATION

Reason for Consultation:

EMPLOYEE REACTION / ATTITUDE

Employee's Reaction:

MANAGER RECOMMENDATION / FOLLOW-UP ACTION

Consultation sent to Assistant V.P.?

Employee's Signature_____
Manager's Signature