

function — *of beauty*

ACCIDENT REVIEW BOARD

FOB-EHS-016

Function of Beauty 5570 Snyderstown Rd. Paxinos, PA 17824

FUNCTION, INC

Accident Review Board Program

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1.0 Mission Statement

- 1.1. Function Inc. endeavors to provide and maintain a safe place of employment that is free from all recognized hazards that may cause harm to employees or to guests. Function Inc. requires all employees to comply and adhere to all safety regulations and rules as prescribed by the laws applicable to his/her own actions and conduct.

2.0 Responsibilities

- 2.1. The Accident Review Board (ARB) is a subcommittee of Function Inc.'s Safety Committees and will meet monthly to review and evaluate incidents from the previous month.
- 2.2. At a minimum, the membership of an ARB must include;
 - 2.2.1. The EHS Director
 - 2.2.2. Site Safety Specialist
 - 2.2.3. A Human Resources representative
 - 2.2.4. The ARB Chairperson
 - 2.2.5. Operations Manager or Managers
 - 2.2.6. Individuals invited to participate in an ARB meeting by those listed above.
 - 2.2.6.1. **Exception:** should an incident on the agenda be directly related to regular members as listed above, that member will recuse themselves from that month's meeting and ensure that a temporary replacement representative is present.
- 2.3. In addition to reviewing incidents, the ARB may recommend updates to policies and operating procedures.
- 2.4. The Accident Review Board (ARB) program will:
- 2.5. Strive to reduce the number of employee-related incidents requiring off-site medical treatment.
- 2.6. Investigate incidents of company property damage.
- 2.7. Attempt to identify the root cause(s) for incidents.
- 2.8. The administration of each ARB will be coordinated by the Chairpersons. Chairpersons will be responsible for scheduling monthly meetings, distributing meeting agendas, presiding over meetings, tracking meeting attendance, composing and distributing incident determinations, and ensuring full accountability for the ARB Process. ARB Chairpersons will work collaboratively with each other to ensure procedural alignment and consistency amongst each group.

3.0 ARB Determination Process

- 3.1. All reviewable incidents will be classified as either Non-Chargeable, Letter of Caution, or Chargeable.
- 3.2. If multiple employees are involved in an incident, each person's role will be reviewed.
- 3.3. Each individual that has been found to have contributed to the incident is subject to a determination rendered by the ARB.

4.0 ARB Determinations

4.1. Non-Chargeable

4.1.1. Employee's actions were appropriate and did not directly contribute to the cause of the incident, and/or, the incident was not reasonably foreseeable by the employee given the circumstances that were present at the time.

4.1.1.1. Example: Employee developed an allergic reaction due to a bee sting received while emptying a trash receptacle.

4.2. Letter of Caution:

4.2.1. Employee's action, or lack of action, directly contributed to the cause of the incident, or the employee did not use a reasonable level of caution for the given circumstances that were present at the time. A Letter of Caution is non-disciplinary and serves to document that Function Inc. has discussed methods to avoid a recurrence of the incident with the Employee.

4.2.1.1. Example: Employee was distracted while talking to a co-worker and walked into an object resulting in an injury.

4.3. Chargeable:

4.3.1. Employee's action, or lack of action, directly contributed to the incident through the blatant violation of a known policy, procedure, or task training. A Chargeable Letter is non-disciplinary and serves to document that the Function Inc. ARB has discussed the unsafe act and methods to avoid a recurrence of the incident with the Employee. When circumstances permit, Chargeable determinations should include a full investigation and root cause analysis, conducted by the EHS Department, prior to rendering the determination. Function Inc. reserves the right to separately address policy and procedure violations through standard, progressive disciplinary action.

4.3.1.1. Example: An employee was standing on the top rung of a portable step ladder and fell resulting in injury.

4.4. Distribution of Determination Letters

4.4.1. The ARB Chairpersons will compose all determination letters.

4.4.2. Department Directors are responsible for ensuring that all determination letters are reviewed with employees and that each copy is signed and then routed as follows:

4.4.3. The Employee retains one signed copy.

4.4.4. The Department retains one signed copy.

4.4.5. One signed copy is sent to the ARB Chairperson.

4.4.6. One signed copy is sent to the Human Resource Department for inclusion in the employee's personnel file.

4.4.6.1. In the event that an employee is no longer employed by Function Inc. at the time of the evaluation; a determination will still be issued and a note will be made on the determination letter stating that the employee is no longer employed.

4.5. Limitations on the ARB Process

- 4.5.1. In the event that a determination for an accident is not reached before ninety (90) days from the date of the accident, the accident will be dropped from ARB agendas and recorded as “No Determination Reached” for that incident’s ARB records.
 - 4.5.1.1. Circumstances that are out of the control of the ARB, or of Function Inc. such as an involved employee’s extended leave of absence or other circumstances may extend the limitation period of ninety (90) days at the discretion of the Directors of EHS and Human Resources.
- 4.5.2. All incidents on the Accident Review Board Agenda will be accompanied by a full Root Cause Analysis Investigation Report by the EHS Department.
 - 4.5.2.1. Incidents that do not warrant an RCA Report will be omitted from the ARB Process.
 - 4.5.2.2. Incidents that have an RCA investigation and Reports that have not been completed will be held until the next available ARB Meeting following the completion of the report by EHS.
 - 4.5.2.2.1. It is at the discretion of the EHS Department and Human Resources if delays in the completion of an RCA Investigation & Report meets the criteria of section 3.5.1.1 of this program.

5.0 Appeal Process

- 5.1. If an employee disagrees with the determination of the Accident Review Board, an appeal hearing may be requested.
- 5.2. The request for an appeal will be submitted in writing to the ARB Chairperson(s).
- 5.3. Upon receiving an appeal request, the ARB Chairperson will convene an appeal panel to include; the ARB Committee Chairpersons, The Director of EHS, and a Human Resources representative.
- 5.4. The hearing will be scheduled on an agreed-upon date at which time the employee and their supervisor will be given an opportunity to state the reason for their appeal and all supporting information.
- 5.5. The ARB appeal panel will then evaluate the incident and rule to uphold or overturn the initial determination.

6.0 Previous Incidents & Employee Behavior Related to Safety

- 6.1. Function Inc. provides a safe working environment for all employees that meets or exceeds applicable standards set by the Occupational Health & Safety Administration (OSHA) and other similar Federal, State, Local, and International entities where applicable.
 - 6.1.1. This includes consideration of employees that are found to habitually violate company safety policies and present a continued safety risk to themselves and/or other employees, contractors, visitors, and guests on

Function Inc. properties. This will include both intentional and unintentional actions of said employee.

6.1.2. In situations where an employee, group of employees or other agent of Function Inc. is the cause or significant contributor to the conditions that lead to accidents and injuries (even if to themselves) these previous incidents will be considered during ARB proceedings and contribute to the finding of this body for up to one rolling calendar year (365 consecutive calendar days) from the date of occurrence.

6.1.2.1. In the event that an employee's behavior falls into this subsection, it may be concluded by Human Resources and/or the employee's Department Head that positions of privilege or added responsibility may be revoked for a period of time deemed appropriate by Human Resources and the employee's Department Head. These can include, but are not restricted to:

- 6.1.2.1.1. Lead Positions
- 6.1.2.1.2. Safety Champion
- 6.1.2.1.3. Area Supervisor
- 6.1.2.1.4. Area Manager
- 6.1.2.1.5. Trainer
- 6.1.2.1.6. Etc.

6.1.2.2. Clause 6.1.2 does not impede an employee's ability to apply for positions posted by HR during that period. Function Inc. is an equal opportunity employer and no portion of this program seeks to supersede that status.

7.0 Document Review and Approval

- 7.1. **6.1 Date Devised:** 10-10-2021
- 7.2. **6.2 Reviewed Date:** 12-07-21
- 7.3. **6.3 Date Approved:** 12-07-21
- 7.4. **6.4 Approved By:** Ed Noter, Director, EHS