



ISSG/PVD Safety Standards

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LOWE'S
Loss Prevention & Operations Support Team
MOORESVILLE, NORTH CAROLINA

Revised April 11, 2017

Introduction

Lowe's has a long-standing history of creating a safe, friendly shopping experience and a secure working environment. Lowe's has established strict guidelines for our stores to help ensure the safety of our employees, customers, In-Store Service Group(s) ("ISSG"), and Product Vendor Direct(s) ("PVD").

This manual is intended to serve as a reference guide for all Lowe's ISSG/PVDs, and their employees, agents, contractors and subcontractors who will be working in any Lowe's store locations, RDCs, and other Lowe's facilities. Though it is not comprehensive, the ISSG/PVD Safety Standards Manual is an outline of Lowe's safety program and expectations. All ISSG/PVDs should familiarize themselves with these standards. ISSG/PVDs will be held accountable for infractions of Lowe's standard operating policies & procedures. ISSG/PVDs who disregard any of Lowe's safety standards can and will be asked to leave the facility.

Our customers and employees are of the utmost importance to us. Should an ISSG/PVDs sacrifice safety or disregard the safety guidelines at any time, action will be taken as outlined in the Lowe's Service Agreement. Should the action of an ISSG/PVD result in an incident at Lowe's, our Risk Management Department will pursue compensation through the subrogation of claims.

As a basis for ISSG/PVDs' activities in the Lowe's store environment, we expect every ISSG/PVD to comply with all federal, state, and local ordinances. These ordinances include, but are not limited to the following regulatory bodies:

- OSHA
- EPA
- DOT
- NFPA
- NEC
- Local Authority Having Jurisdiction

This manual is not considered to be inclusive of all mandated safety and health related programs (federal, state and local), but should be used as a guide when working with Lowe's. ISSG/PVDs are required by law to draft their own standalone programs, such as Hazard Communication, Blood borne Pathogens, Lock Out / Tag Out and others.

Recommendations for Safe Attire

- To reduce the risk for potential bodily injury, hoop earrings should not be worn in stores and any pierced body part(s) (including, but not limited to, ears, nose, tongue, eye brows, etc.) should not be exposed while working. Stud earrings (no larger than a dime) should not be worn in pierced ears while working.
- ISSG/PVDs should avoid wearing excessively baggy clothing including pants that do not fit around the waist. Loose-fitting clothing should be gathered and tucked in and long sleeve shirts should be rolled or folded above the elbow especially when using machinery or rotating equipment to help avoid getting loose garments caught in the machines.
- Long necklace chains and excessive rings/bracelets should either be removed or tucked away as they may also get caught while working.
- For personal safety, open toed and open heel shoes should not be worn while working. In order to shield ISSG/PVDs feet from potential hazards, sandals, clogs, open toe or open heel shoes are strongly discouraged even if the shoes have heel straps.
- Headphones or ear buds should not be worn while performing work at store locations as awareness of surroundings is important for a safe work environment.
- ISSG/PVDs working in Lawn and Garden who are exposed to the sun and other elements are encouraged to wear straw hats while working outside. These hats should meet the following requirements to promote visibility and to maintain a professional demeanor:
 - The hat's brim should not exceed 4-inches.

- Hats cannot contain any ornamentation which includes, but is not limited to, bandanas, ribbons, scarves, feathers, pins, and clips.

Reporting Incidents

All ISSG/PVDs are expected to have a formal procedure in place for reporting accidents with respect to workers' compensation, general liability, and property damage claims. This policy must adhere to all applicable OSHA reporting guidelines as well as state Workers' Compensation Law. Additionally, ISSG/PVDs are expected to report any incidents occurring at any Lowe's location to the Store Management team. This policy specifically includes injuries to ISSG/PVDs who are covered by their employer's Worker's Compensation insurance. Lowe's personnel will report this type of injury as a "General Liability" claim.

General Safety Standards

- All ISSG/PVDs are required to abide by all federal, state, and local safety laws and regulations while on Lowe's premises. ISSG/PVDs must also ensure that their representatives maintain the safety of their work areas during their visit, and leave their work areas in a safe and clean condition when they leave Lowe's premises.
- All ISSG/PVDs must ensure that their representatives abide by Lowe's ISSG and PVD Safety Standards, which include General Safety, Merchandising, Power Equipment, Facilities, and OSHA Requirements.
- ISSG/PVDs should avoid engaging in conduct that poses a risk of bodily harm to customers, Lowe's employees, other ISSG/PVDs, contractors, and themselves.
- ISSG/PVDs must inform the Store Manager or an Assistant Store Manager of any incidents involving bodily injury and should contact the proper medical personnel immediately.
- ISSG/PVDs should notify Lowe's Loss Prevention of any potential safety hazards.
- For safety reasons, smoking is prohibited on Lowe's property, including the parking lot, at all times.
- Vendors must not wear headphones or earbuds while performing work at store locations as awareness of surroundings is important for maintaining a safe work environment.

Fall Protection

ISSG / PVD must wear ANSI approved fall protection anytime they are working on an order-picker. This includes all times that the power equipment is moving at ground level, as well as when it is raised for retrieving or stocking merchandise.

Fall Protection Equipment Exception: ONLY ISSG/PVDs may use a tether and scaffold anchor wrap ("beam choker") as fall protection. LOWE'S EMPLOYEES ARE NOT ALLOWED TO TETHER TO RACKING.

Note: Please review the operating requirements in the "Power Equipment" section of this program for more details.

In order to complete their job, ISSG/PVDs may need to work inside the rack during the rack set or in some cases, when conducting a reset or display install. This step requires the use of a secondary beam choker and tether. The ISSG/PVD would attach the beam choker to the 5.5 inch beam and attach the second tether to the beam choker before unhooking from the first tether. The beam choker used for attaching personal fall arrest equipment must be independent of any anchorage being used to support or

suspend platforms and be capable of supporting at least 5,000 (22.2kN) pounds per employee attached.

The ISSG/PVD would remain tethered to the order picker until the beam choker is attached to the 5.5 inch beam and second tether is attached to the beam choker and harness. This will help ensure the ISSG/PVD has fall protection throughout the entire process. Before returning to the order picker, the person would reconnect the tether to the order picker before removing the beam choker connection.

When working within racking systems, fall protection tie-offs must be used **in addition to accepted body harnesses and tethers**. Fall protection that is manufactured by Fall Safe is recommended. These items (tether, harness, two-foot beam “choker,” which is needed to go around the 5.5 inch beam) can be ordered in stores through Spend Management. The item #s are as follows:

- 40076- HARNESS- VEST STYLE FULL BODY - S-M-1/EA
- 40078- HARNESS- VEST STYLE FULL BODY - X-SMALL 1/EA
- 40079- TETHER- SAFETY EQUIPMENT 3101016 (7 FT) 1/EA
- 40080- HARNESS- SAFETY EQUIPMENT-FULL-BODY Large-XL 1/EA
- 40081- HARNESS- SAFETY EQUIPMENT- FULL BODY XXXL XXXXL 1/EA
- 40082- HANDLE- ASSEMBLY ANCHORAGE FOR TALON/TETHER 1/BG



Not for Lowe's employee use

If you wish to order fall protection directly from the supplier, Tarheel Paper Company, contact Scott Miller, the account representative at (336) 714 – 4758. If a like product is used from a different vendor, the item must conform to the same standards and training as what is required by Lowe's.

The company that employs the ISSG/PVD must provide their own equipment and tools unless otherwise stipulated in their agreement with Lowe's. All fall protection equipment must meet ANSI (American National Standard Institute) standards. Fall protection includes beam chokers which ISSG/PVDs must remove and take with them when the job is complete. All beam chokers must meet OSHA 1926-502, ANSI Z359.1-2007, and ANSI A10.32.2012 safety standards as well as any applicable local federal, state and local regulations. The chokers can be ordered by calling FSP USA at (704) 262-7893.

For more information about the required fall protection equipment standards, ask a member of the Store Management Team to allow viewing of the “Components of Fall Protection Equipment” document on LowesNet (Departments > Loss Prevention / Safety / HazMat > Resources > Fall Protection Equipment Guides). Printed copies of the document are also available upon request.

Electrical Standards

Electrical safety is of the utmost importance; therefore, we have emphasized some basic expectations, which are outlined below. These guidelines in no way supersede any electrical codes and does not serve as a complete list of expectations to be used when working with electrical components while at Lowe's. The guidelines are a starting point and all ISSG/PVDs are expected to comply with all standards under the National Electric Code.

The following electrical standards must be followed at all times:

- All lighting display installations and similar permanent electrical installations must be performed by a professional electrician.
- All outlets used outside the store must be protected by a Ground Fault Circuit Interrupter.
- Do not overload outlets by plugging in excessive number of cords and cables.
- The use of extension cords to provide permanent power to equipment, operational areas, or

displays of any kind is prohibited. Permanent power is defined as being the power source for anything for more than 90 days.

- Extension cords must be 14-gauge, 2 wire cords with a grounded 3-prong plug and be in good condition with no visible frays or damage. Damaged or non-approved cords must immediately be removed from service.

Merchandising

Top Stock and Merchandise Placement

- ISSG/PVDs must make sure that each load in top stock is banded, shrink-wrapped, interlocked, or pyramid stacked.
- Top stock *must* either be shrink-wrapped or banded when on pallets or when hand-stacked boxes are stored in racking; as a general rule, they should not be stacked higher than 4-feet or 4 times the height of the base.
- Any stacks that are leaning or unstable must also be repackaged or restacked.
- Crushed boxes should never be used as the base for palletized loads or hand-stacked merchandise and when possible, should be removed from top stock.
- It's extremely important to avoid restricting or blocking any fire safety systems with merchandise; as a rule, top stock *must not* be stored within 36 inches of sprinklers.
- Do not place hand-stacked merchandise in the same bay as palletized merchandise.

Palletized Merchandise

- Anything that has to be palletized should be shrink-wrapped and stored in racks (except for shingles, which are delivered to the store tightly interlocked).
- Palletized materials should never restrict or block sprinklers, fire extinguishers, hoses, emergency exit signs, electric panel boxes, or exit doors. Top stock must not be stored within 36 inches of sprinklers or restrict the sprinkler water discharge pattern.
- As a general rule, pallets should not exceed four (4) feet in height. For information on guidelines and the proper handling of specific item types, ask a member of the Store Management Team to allow viewing of the "Storage Requirements for Specific Items" reference document on LowesNet (Departments > Loss Prevention/ Safety / HazMat > Safety Programs). Printed copies of this manual are also available upon request.
- Any damaged pallets should be taken out of service.
- Palletized loads must never be stacked on top of each other (double-stacked).
- Do not place loose merchandise on top of shrink wrapped and palletized merchandise.

Cantilevered Merchandise

- All lumber at the retail level must be retained with properly mounted lumber retention poles.
- All bunks of lumber stocked above the retail level must be banded with at least 2 bands; larger bunks of lumber require more bands.
- Palletized merchandise cannot be stored on cantilever arms.
- Pallets must not be stacked on top of lumber that is stored on cantilever arms.
- Full bunks of lumber may not be double-stacked on cantilever arms, however, several $\frac{1}{4}$ or $\frac{1}{8}$ bunks of lumber may be stacked to the size of one full bunk, which is 4-feet high

Vertically Stored Merchandise

Vertically stored merchandise is product that is stocked upright in the racking and has the potential of falling forward, such as ladders or molding.

ISSG/PVDs are responsible for knowing that vertically stored merchandise 4-feet tall or higher must be secured by a restraint cable and/or beam and toe kick to prevent it from falling or sliding out. Vertical restraints cables are not designed to hold storage in place permanently. The cable is designed to reduce the possibility that the merchandise will fall into the aisle while the kick beam or toe board helps reduce the possibility that the merchandise will slide out into the aisle. ISSG/PVDs should report any broken or missing restraint cables/beams and toe kicks to a member of Lowe's Management or a Loss Prevention and Safety team member.

For more information about vertically stored merchandise, ask a member of the Store Management Team to allow viewing of the "Vertically Stored Merchandise" reference document on LowesNet (Departments > Loss Prevention/ Safety / HazMat > Safety Programs). Printed copies of this manual are also available upon request.

Top Stock Safety Netting and Cable

Certain states require top stock netting and cables to provide customers and employees with additional protection. Top stock netting and cables have been installed in Lowe's stores nationwide.

It is critical to remember when working in an area with safety netting that if you are putting up or taking down merchandise from a shelf where product is secured by netting, you must re-attach the netting as soon as the job is complete or whenever you plan on moving away from the area.

Netting or cabling that is taken down during a reset or remerch must be replaced after the job is complete.

For more information about top stock netting and cabling, ask a member of the Store management Team to allow viewing of the "Top Stock Netting/ Cable Program" reference document on LowesNet (Departments > Loss Prevention/ Safety / HazMat > Safety Programs). Printed copies of this manual are also available upon request.

Power Lift Equipment

ISSG/PVDs are prohibited from operating Lowe's power equipment during normal business hours; however, they may work off an order-picker if a properly certified Lowe's associate is operating the equipment. Only two

persons (the operator and one passenger) are permitted on the equipment at a time. When working off an order-picker at any height, the operator and passenger shall wear a full body harness connected to a self-retracting lifeline. The self-retracting lifeline shall be attached to the designated anchor point on the order-picker.

Power Equipment certified Lowe's associates may operate power equipment and assist ISSG/PVD/suppliers with their work. The decision to allocate power equipment and operators to assist an ISSG/PVD/supplier is solely at the discretion of the Store Management.

ISSG/PVDs may operate Lowe's power equipment (except as otherwise noted in these standards) during new store set and when the store is closed to customers (during night resets). However, the ISSG/PVDs must be able to provide licensure proving that the operators who will be working on the equipment have successfully completed an OSHA compliant power equipment training course.

ISSG/PVDs should always ask for an employee to spot/assist when down-stocking heavy objects or using a ladder.

Power Equipment Safety Rules

It is critical to understand the importance of power equipment safety. The following are some general safety rules to follow when operating power equipment at Lowe's:

- Never walk under or allow anyone else to walk under the forks of a forklift when they are raised.
- Never walk or let anyone else walk under an elevated order picker platform.
- Never ride on the forks or the cab of power equipment; there are no passengers on Lowe's counterbalance and motorized hand trucks.
- During specific times, there can be an operator and a helper on an order picker; both must be properly ***harnessed and tethered***.
- When operating or escorting power equipment, never allow the forklift to drive over debris that is left on the floor.

Only licensed ISSG/PVDs may operate Lowe's power equipment during these specified time frames:

- During rack sets, merchandising, and general set up processes for a new store opening.
- During resets ***only*** after store hours when there are no customers on premise.

ISSG/PVDs may operate ISSG/PVD-supplied power equipment, such as scissor or man lifts, during store operating hours as long as they understand and observe the requirements outlined in the following policies, which can be obtained by asking a member of the Store Management Team to allow viewing these policies on LowesNet (Policies and Procedures > Loss Prevention > Power Equipment). Printed Copies of the policies and procedures are also available upon request:

- Aisle Blockers, Spotters and Escorts Policy
- Power Equipment Responsibilities and Operator Requirements Policy
- Power Equipment Safety Rules Policy

It's also important to make sure operators are following safety rules. Make sure that:

- Trucks aren't traveling faster than normal walking speed.
- Operators slow down and honk the horn at all crossings, corners, blind turns, crowded intersections, and any other area where their vision may be blocked.
- **All operators use seatbelts when operating counterbalance trucks; if you see someone operating an order picker, make sure that he or she is wearing both the harness and tether.**
- **Whenever an operator lowers the platform, they must honk the horn as a warning. At Lowe's, no**

job is so important that we compromise the well-being of our employees, our customers, or our vendor-partners.

For more information about power equipment, ask a member of the Store management Team to allow viewing of the policy and procedure documents pertaining to Power Equipment located on LowesNet (Policies and Procedures > Loss Prevention > Power Equipment). Printed copies of the policies and procedures are also available upon request.

Aisle Blockers / Spotters / Escorts

Aisle blockers, spotters and power equipment escorts must be used when power equipment (i.e., forklifts, reach trucks, order pickers and motorized hand trucks) is operated in customer areas during business hours. It is the escort's responsibility to notify customers that power equipment is being driven in the area. At Lowe's, we require at least a 10-foot cushion of space between power equipment and any person. Being a power equipment escort is a very important responsibility.

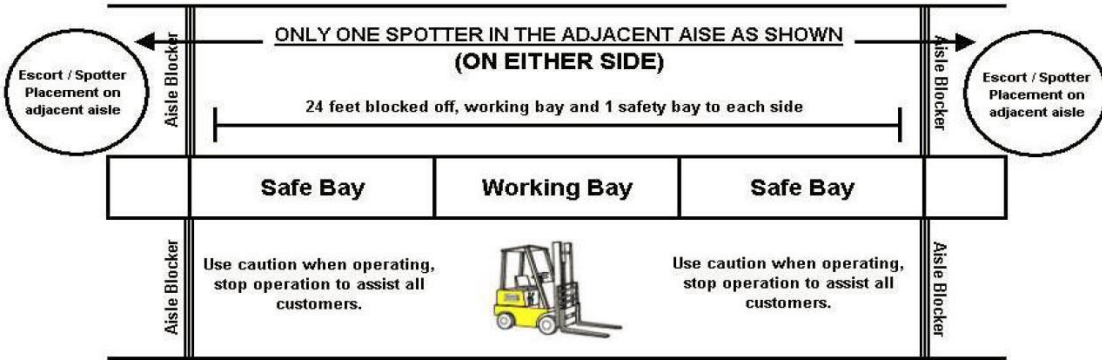
Spotters

Escorts become **spotters** when the Power Equipment stops moving and begins loading or unloading merchandise. A spotter's job is to look for and alert customers, ISSG/PVDs, and employees coming too near the Power Equipment or the area it's working in.

Here are some important things to know about being a spotter:

- Spotters need to be proactive, always looking around for customers and other employees approaching the area.
- Spotters must maintain good communication with the power equipment operator, other employees, and customers.
- Spotters must be used in the working aisle any time power equipment is used to maneuver merchandise in the **retail space**. Retail space is defined as the space that includes the floor up to 8 feet above the floor.
- When someone is working **top stock**, a spotter must be placed in the adjacent aisle because stock can be pushed off to the next aisle.
- **Spotters are also required in the adjacent aisle when someone is working on a cantilever rack; much like pallet racking, merchandise can be pushed off to the next aisle.** Please see the diagram below.

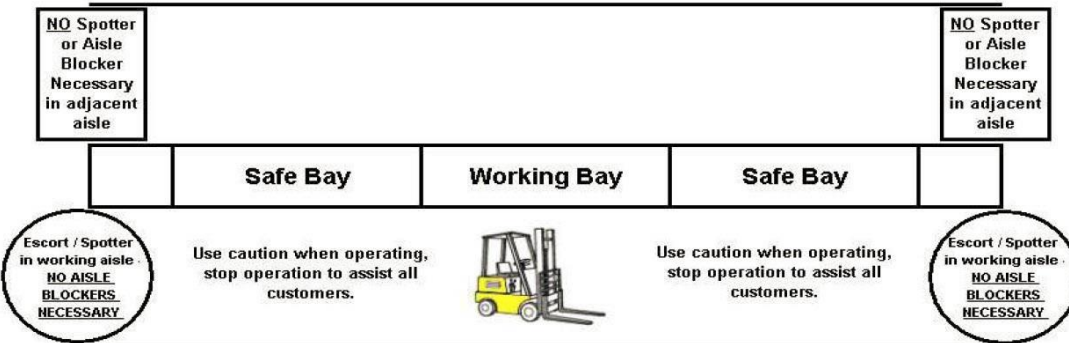
Working Above Retail Space with any piece of Powered Equipment - at the TOP SHELF, FEEDER SHELF & OVERSTOCK levels



Block off the working bay and one bay to either side of the working bay. In this scenario ONE spotter is needed in the adjacent aisle, they must stand to one side of the blocked off area outside of the aisle blockers. As stated above, both aisles will need to be blocked off before operating the Powered Equipment. Escorts are to become spotters.

Diagram - 2

Working with any piece of Powered Equipment in the RETAIL SPACE (Floor to 8 Ft.)



Aisle blockers are NOT required in this scenario. ONE Spotter is necessary in the working aisle. The Escort should become the Spotter. The Spotter should keep a 10 foot space cushion between customers and Powered Equipment and should ensure that safe operating practices are met as specified in Lowe's Policy & Procedure. IF A CUSTOMER REQUIRES ASSISTANCE, STOP POWERED EQUIPMENT OPERATION TO ASSIST THEM.

Lowe's

Diagram - 3

For more information about aisle blockers, spotters, and power equipment escorts, ask a member of the Store Management Team to allow viewing of the Aisle Blocker, Spotter, and Power Equipment Escorts policy on LowesNet (Policies and Procedures > Loss Prevention > Power Equipment). Printed copies of the policies and procedures are also available upon request.

Aisle Blockers

We use **banner-type aisle blockers** and **accordion-type aisle blockers** as both a warning and a physical barrier to keep people from entering an aisle. When power equipment is being used to manipulate merchandise at the **retail level (up to 8 feet)**, make sure a spotter is in the same aisle as the Power Equipment and where the work is being done. When power equipment is being used in **top stock (above 8 feet from the floor)**, make sure that the aisle being worked and the adjacent aisle are blocked off by 2 aisle blockers (4 total) for each aisle. Also make sure that a spotter is placed in the aisle opposite where the power equipment is being operated. Please refer to diagrams 2 and 3 illustrated above.

- Banner-type aisle blockers should be placed on racking uprights 8 feet from the bay being worked on; placing the banner-type aisle blockers on **both sides** of the power equipment creates a 24-foot safety zone.
- Place aisle blockers approximately 4 feet high on the racking uprights. Customers may try to duck under blockers that are placed too high.
- To attach the banners, wrap the bungee around the upright and attach the hook to the bungee. Do not clip the hook directly to the upright as doing so will cause the clip to break.
- If you discover broken hooks while attaching a banner, notify a store employee.
- After using the banners, return them to the storage bags that are mounted on the power equipment (4 banners can be stored in 2 bags on each piece of power equipment).

Obtaining Certification for Operating Power Equipment

Lowe's has partnered with Yale of the Carolinas to offer ISSG/PVDs a power equipment certification program. Yale now hosts power equipment training classes at the Lowe's planogram facility for our ISSG/PVDs. This class is a "train-the-trainer" session for ISSG/PVD groups only and purportedly meets all OSHA guidelines for operator training. Additionally, by attending this class, ISSG/PVDs are given access to a Lowe's ISSG/PVD power equipment license. Attending this class qualifies ISSG/PVDs for a Lowe's power equipment license.

Lowe's has also collaborated with "Ballymore" to provide ISSG/PVDs training with the operation and usage of the Power Stock Lift for Certification and General Safety Practices. Contact Ballymore for specific details.

Note: The training and certification on the Power Stocker units does not constitute power equipment training at Lowe's. This PSL unit is not classified as "power equipment" at Lowe's.

- Prior to use, all ISSG/PVDs needing to operate Lowe's power equipment must provide current (completed within the past 2 years) proof of training from their employer for the specified piece of equipment. The ISSG/PVD should provide their proof of certification to one of the following employees:
 - Freight Flow Department Manager
 - HR Manager
 - Department Manager Loss Prevention and Safety/Loss Prevention and Safety Specialist (LPSS/DMLPS)
 - ASM Administration
 - Store Manager

One of the aforementioned positions will review the certification, ask for the ISSG/PVD's intended use for the equipment, and confirm that the certification is valid before granting the ISSG/PVD permission to operate the equipment. ISSG/PVD are prohibited from operating any equipment other than what is stated on their ISSG/PVD's certification.

- The ISSG/PVD's power equipment certification must meet the basic minimum requirements for certification as stated in OSHA Regulation 29 CFR 1910.178 (l) and the certification must be current (within the past two years). The ISSG/PVD's current employer (i.e., the ISSG/PVD's company) is responsible for making sure their ISSG/PVDs meet these requirements.
- To promote safety, any ISSG/PVD who is unable to provide the required proof of current certification will not be permitted to operate power equipment until they are able to provide all required documentation. There are no exceptions to this requirement.
- ISSG/PVDs may serve as escorts and spotters for power equipment as long as the Lowe's power equipment operator ensures the ISSG/PVD understands and observes the requirements as outlined in the following policies. Ask a member of the Store Management Team to allow viewing of the policies pertaining to requirements for operating power equipment on LowesNet (Policies and Procedures > Loss Prevention > Power Equipment). Printed copies of the policies and procedures are also available upon request.
 - Aisle Blockers Spotters and Escorts Policy
 - Power Equipment Responsibilities and Operator Requirements Policy
 - Power Equipment Safety Rules Policy

Facilities Safety

Machine Use

At times, ISSG/PVDs may need to use Lowe's equipment, such as the panel saw, etc., to complete their jobs. Lowe's prefers ISSG/PVDs to provide their own equipment to complete their in-store tasks. However, ISSG/PVDs requiring the use of store equipment should inform a member of the Store Management Team that they wish to operate the equipment. Operating requirements are as follows:

- The ISSG/PVD must be familiar with the equipment that they will be operating.
- All safety guards and devices that are provided by the manufacturer must be in place and in proper working order.
- Personal Protective Equipment (PPE) must be worn as required by the specific machine being operated.

Cardboard and Waste Disposal

Lowe's employees using the cardboard baler must fulfill all training requirements and meet the age restriction to obtain authorization for operating this machine. ISSG/PVDs are not authorized to operate balers and should place all cardboard waste in front of the baler. ISSG/PVDs should also place waste needing to be disposed in the trash chute next to the trash chute; ISSG/PVDs will not have access to the trash chute, which is to remain secured and locked when not in use.

Exception: Authorized ISSG/PVDs working at Lowe's CDTs are all allowed to use bailers and trash chutes.

ISSG/PVDs are responsible for notifying an employee from the respective department they are servicing or a Receiving Department employee of any cardboard or waste they are leaving in front of the cardboard baler or next to the trash compactor. The employee who is notified should promptly dispose of the waste or cardboard to remove potential safety hazards in the Receiving area.

Machine Maintenance

Proper machine maintenance at Lowe's is of paramount importance; it helps to keep customers and employees safe while shopping and working. Equipment that is not functioning properly must be removed from service immediately until it can be repaired or replaced. The majority of the equipment found at Lowe's are under contracts with outside ISSG/PVDs to provide periodic service as well as emergency service. When contracted ISSG/PVDs provide service to our store's equipment, they are required to adhere to all applicable Lowe's Safety Standards and to all federal and state safety and health regulations.

Equipment Inspections and Maintenance

- All equipment must be maintained in safe condition.
- All equipment (power equipment, ladders, tile & wood saws, compactor & baler) must be visually inspected before each use.
- Equipment that is tagged as "out of service" must be marked as such and should not be operated until repairs are made.
- Only authorized service contractors may perform maintenance on Lowe's equipment. ISSG/PVDs and other non-Lowe's employees are not permitted to disassemble or engage in the repair of any Lowe's equipment unless they are specifically trained and contracted to do so.
- Lockout / Tag-out (LoTo) procedures will be initiated as required for maintenance operations by authorized maintenance contractors. Refer to the Lockout / Tag out section of this program for more details.
- All ISSG/PVDs shall be aware of, and avoid contact with any equipment that is locked or tagged out of service, or otherwise undergoing maintenance.

Ladders

ISSG/PVDs may use ladders belonging to Lowe's contingent upon meeting the following requirements. For safety, ISSG/PVDs must:

- Understand how to inspect and use ladders correctly and safely.
- Always use the 3-Point Touch system meaning two hands and one foot or two feet and one hand should always be touching the ladder at all times.
- Never step off the ladder onto racking or displays. If you need to get closer, either move the ladder or use an order picker and operator.
- Never attempt to use a ladder as an anchor point for fall protection. Beam Chokers, Order Pickers and Scissors lifts with proper anchor points are the only acceptable places to anchor a retractable lanyard.
- Ascend and descend the ladder facing up towards the top of the ladder. Keep ladder platforms and steps clear and free of debris, tools, or product.
- Never stand on, or place merchandise on ladder railings, and remain within the confines of the railings at all times.
- Store-stock ladders are not permitted to be used. Lowe's in-house, gray rolling ladders are available for ISSG/PVDs' use.

Note: Fiberglass stepladders may also be used only when working in the light / fan cloud or otherwise working with electricity. Step stools and other unapproved ladders are prohibited.

Racking Standards

Racking at Lowe's is the backbone of the business and as such, it is important that you know some of the basics when it comes to racking safety. Rack is inspected on a regular basis during the daily safety review that

is completed by the Loss Prevention Manager/Specialist, Store Manager, or Assistant Store Manager. This is conducted on a daily basis so that all damage is noted and replacement parts are ordered.

Damaged Racks

Any person who damages a rack or is aware of rack damage must immediately report it to the Store Manager, the Assistant Store Manager or the Loss Prevention Manager/Specialist.

Damaged racks will be marked with the red letters “TBR1” or “TBR2” (TBR = To Be Replaced)* and with the date the inspection occurred by a member of Store Management.

Note – Beams marked with “TBR1” must have the product removed only from the effected bays as soon as the damages are discovered. Beams or uprights marked with “TBR2” are not required to have the product removed until the replacement parts arrive. No one should ever attempt to fix or repair any piece of the racking system. Any damaged component of the racking system must be replaced.

Yellow caution tape is then put on the damaged rack to warn others not to reload it. In areas where counterbalance lift trucks are operated, (e.g., Quikcrete aisle, Outside Lawn and Garden Center, etc.) yellow landscape timbers are used **in front** of damaged rack uprights as warning. These are to be connected to the uprights with heavy-duty zip ties.

For more information about rack safety, ask a member of the Store Management Team to allow viewing of the policies and procedures pertaining to racking on LowesNet (Policies and Procedures > Loss Prevention > Racking and Planograms). Printed copies of the policies and procedures are also available upon request.

OSHA Requirements

Power Equipment

All rules and regulations are required to be followed per the Power Equipment section of this manual.

Hazardous Materials

All waste products generated as result of resets, remerchandising of a Lowe’s product, or work performed on the premises, must be properly stored, accounted for, and verified by the Store Management Team. Products are **never** to be thrown into the compactor and must be disposed of in accordance with federal, state and local regulations. At Lowe’s, we have a very strict Hazardous Materials Disposal Program. All products are separated into several different waste streams based upon their chemical characteristics.

It is important to notify a member of Store Management when a spill occurs so that the spilled material can be properly cleaned, bagged and disposed of. If the spill is too large for the store to deal, then the HazMat support line should be notified. All areas of work must be secured at all times. ISSG/PVDs’ equipment, tools, chemicals or any other potentially hazardous substances must never be left unattended on the sales floor of the store.

Personal Protective Equipment (PPE)

On July 5, 1994, The Occupational Safety and Health Administration (OSHA) issued a final rule setting a new industry safety standard for the need, selection and use of Personal Protective Equipment (PPE). This standard is designed to protect employees who work in jobs that contain hazards that cannot be eliminated

through design and/or engineering processes. Included in this standard are requirements for head, eye, face, respiratory and hand protection. An assessment has been completed company-wide of the areas that require Personal Protective Equipment, what PPE is needed and instructions on how and where to obtain the PPE. Lowe's employees use PPE in the Distribution Centers, Millworks facilities, and specific areas of the stores as designated.

To promote safety, ISSG/PVDs are required to wear the appropriate PPE that is the same as what Lowe's employees are required to wear. For more information about PPE, ask a member of the Store Management Team to allow viewing of the "Personal Protective Equipment Program" reference document on LowesNet (Departments > Loss Prevention/ Safety / HazMat > Safety Programs). Printed copies of this manual are also available upon request.

Blood borne Pathogens

The OSHA Blood borne Pathogens standard (CFR 1910.1030) establishes safeguards designed to protect workers against the health hazards associated with exposure to potentially infectious blood and other bodily fluids in the workplace.

Lowe's requires that any exposure to blood or bodily fluids be treated with the "universal precaution" that all blood or bodily fluids are potentially infectious material. In the event of an exposure, a member of Store Management should immediately be notified to coordinate an appropriate response.

Fire Protection

The majority of all Lowe's properties are equipped with automatic fire suppression equipment and all locations are equipped with fire extinguishers.

The Lowe's fire protection program includes the following procedures for preventing, detecting, and extinguishing fires. All ISSG/PVDs and suppliers must comply with these standards.

- Smoking is prohibited.
- No sheet goods, such as plywood or pegboard, may be used as horizontal decking in displays.
- All flue spaces (transverse and longitudinal) must be clear and unobstructed. Flue spaces are the open area behind the back beams and back uprights (area between back-to-back racking) and the space that separates a bay of racking from the bay beside it (essentially the width of the upright, between the front and back upright).
- Keep these fire-related areas clear and unobstructed - sprinkler rooms and the area around risers, fire department connections, electrical rooms/panels, and emergency exits.
- Products stored on racking must be stored a minimum of 36 inches below sprinkler heads.
- Fire extinguishers must be clear and fully accessible at all times. Do not block, disguise or move fire extinguishers.

Emergency Evacuations

Lowe's maintains emergency evacuation procedures for all stores. Evacuation routes are posted throughout the store. ISSG/PVDs are expected to familiarize themselves with these evacuation routes and adhere to emergency evacuation procedures.

In the event of an emergency, Lowe's utilizes a uniform evacuation message that the Store Management Team will announce over the Public Address (PA) system. The announcement is as follows:

“May I have your attention please? This is not a test. All customers and employees must leave the building immediately. Please remain calm and proceed to the nearest exit. Leave all merchandise which has not been paid for and calmly go to the nearest exit. Store employees will be available to guide you to the exits.”

If this announcement is made, all ISSG/PVDs must immediately evacuate the building and meet in the designated “safe area” and await further instruction.

Lock out / Tag Out

Lockout/Tag Out is an OSHA-specific procedure designed to prevent accidents and injuries that may occur when a piece of equipment needs repair or when it’s being installed.

Lockout means installing a device – including locks, blocks, or chains – at the power source so the equipment cannot be operated. Simply unplugging a machine isn’t enough to prevent accidental start-up or electrical shock.

Tagout means placing a tag on a piece of equipment that warns everyone not to use it. The tag must clearly state “Do Not Operate” or display a similar warning.

At Lowe’s, the maintenance/service of equipment covered by a lockout/tag out program is performed by outside contractors. Our employees know what a lock/tag or tag on a piece of equipment means and they know **NOT** to remove the lock/tag to attempt starting the machine. Lowe’s ISSG/PVDs should be familiar with lockout/tagout requirements.

For more information about the Lockout Tag out program, ask a member of the Store Management Team to allow viewing of the “Lockout/Tag out annual procedure review & Training Program” reference document on LowesNet (Departments > Facility Service Associate (FSA) >OSHA, HAZMAT, and Safety > Lockout Tag Out Program). Printed copies of this program are also available upon request.

ISSG / PVD Hazard Communication

All vendors and contractors have two obligations under the OSHA Hazard Communication Standard. They must first have their own hazard communication and safety program for their employees. This program must address the safety concerns of their employees and chemicals they use. The contractor secondly must provide to Lowe’s a list of chemicals or the Safety Data Sheet (SDS) for each chemical they intend on using or storing on a Lowe’s site. This information will assist Store Management with determining whether or not Lowe’s employees may be exposed to a chemical hazard.

The following procedures are to be used anytime a contractor is hired to work at a Lowe’s facility:

- Lowe’s ISSG/PVDs must familiarize themselves with any hazardous materials that they may encounter while at Lowe’s, i.e., contractors should research the existence and location of propane tanks if they are expecting to work in close proximity to a propane tank.
- Contractors should not bring onto the grounds of a Lowe’s facility any substances that may be considered hazardous without prior consent of Store Management.
- Contractors are to provide Store Management with a copy of SDSs for each hazardous chemical they intend on using during their work at the Lowe’s facility.
- Contractors will not dispose of, in any manner, substances that may be considered hazardous within the Lowe’s facility without prior consent of Store Management.

- Store Management should consider the following when determining whether to allow the use of any hazardous substance by contractors at a Lowe's facility:
 - Relative hazards of its use
 - Availability of substitutes
 - Disposal of the substances
 - Potential for employee exposure
- Any equipment used by the contractor in areas where flammable materials are stored must be explosion-proof. Questions concerning chemicals or equipment that may be hazardous should be addressed to Store Management.
- Contractor and contractor personnel should seek appropriate information from Store Management, which may include the following:
 - Potential chemical and physical hazards for the area in which contract operations are being conducted
 - Location and availability of Safety Data Sheets
 - Detection of the presence of hazardous chemicals
 - Facility precautions and safety procedures
 - Emergency evacuation procedures including gathering locations
 - Location of the emergency/first aid station, emergency alarms, and direction on the use of additional emergency equipment
 - Hazardous chemical labeling requirement
 - Directions to and appropriate locations for breaks and meals (i.e. eating, drinking, and sanitation facilities) during open and closed hours while working on the store premises.

Licensure Requirement

All ISSGs/PVDs must remain in compliance with all applicable federal, state and local laws, regulations, ordinances, codes or other legal requirements, including, but not limited to, compliance with occupational safety and health, immigration, licensure, tax and pay/hours of work legal obligations.

This policy is not intended to and does not supplant, modify, or amend the respective agreements between Lowe's and the ISSG and PVD. To the extent of this policy contradicts or differs from the terms of such agreements, the respective agreements between Lowe's and the respective ISSG and PVD shall control.

