

INJURY AND ILLNESS PREVENTION PROGRAM CombiMatrix Diagnostics 310 Goddard Suite 150 Irvine, CA 92618

RESPONSIBILITY

For the Injury and Illness Prevention Program (IIPP) the Safety Officer, Justin Johnson and/or Senior Director of Operations, Lori Drugan has the authority and responsibility for implementing the provisions of this program for CombiMatrix Diagnostics 300 Goddard Suite 100 Irvine, CA 92618.

All managers, supervisors and lead personnel are responsible for implementing and maintaining the IIPP in their work areas and for answering worker questions about the Program. A copy of this IIPP is available in 300 Goddard Suite 100 Irvine, CA 92618 and 310 Goddard Suite 150 Irvine, CA 92618.

COMPLIANCE

Management is responsible for ensuring that all safety and health policies and procedures are clearly communicated and understood by all employees. Supervisors and lead personnel are expected to enforce the rules fairly and uniformly.

All employees are responsible for using safe work practices, following all directives, policies and procedures, and for assisting in maintaining a safe work environment. The following is our system of ensuring that all workers comply with the rules and maintain a safe work environment:

- Informing workers of the provisions of our IIPP;
- Evaluating the safety performance of all workers;
- Recognizing employees who perform safe and healthful work practices. This recognition is accomplished by employees who make a significant contribution to the maintenance of a safe workplace, as determined by their supervisors, will receive written acknowledgment of such contributions which is maintained in the employees' personnel files:
- Providing training to workers whose safety performance is deficient;
- Disciplining workers for failure to comply with safe and healthful work practices. The following outlines our disciplinary process:
 - o Under our policy, all employees are required to follow safety and operating procedures. When needed, employee will be provided with additional training and information, or retraining to maintain their knowledge. The disciplinary policy of



our company is intended to encourage employee compliance with our IIPP. Although our company reserves the right to discharge "at will," we believe that employees found performing work in an unsafe manner that would endanger that employee or another employee shall be subject to discipline or termination by management. The safety manager and CombiMatrix leadership team will determine the course of action best suited to the circumstances. The steps to be taken at the minimum shall include the following:

- 1. Verbal Warning- As the first step in correcting unacceptable behavior, the supervisor/manager shall review the pertinent fact with the employee. The supervisor will consider the severity of the problem, and the employee's past performance. A verbal warning will be issued to the employee, which will be documented by the supervisor in the employee's personnel file. If necessary, the employee will be placed on probation.
- 2. Written Warning- If the unacceptable performance continues the next step will be a written warning. The written warning will clearly state the safety policy that was violated and steps the employee must take if it is to be corrected. Probation will be a part of the written warning. It may also include time off without pay. At the completion of the probationary period, the supervisor will meet with the employee to determine if the employee has achieved the required level of performance.
- 3. Termination- The employee may be terminated if he/she does not improve his/her performance while on probation, or has violated another company safety policy within twelve months.
- Other means that we use to ensure employee compliance with safe and healthful work practices include:
 - Management is responsible for ensuring that all safety and health policies and procedures are clearly communicated and understood by all employees. Managers and Supervisors are expected to enforce the rules fairly and uniformly. All employees are responsible for using safe work practices, for following all directives, policies and procedures, and for assisting in maintaining a safe work environment. Our system of ensuring that all workers comply with the rules and maintain a safe work environment include:
 - 1. Informing workers of the provisions of our IIP Program;
 - 2. Evaluating the safety performance of all workers;
 - 3. Recognizing superintendents who perform safe and healthful work practices;
 - 4. Providing training to workers whose safety performance is deficient;
 - 5. Disciplining workers for failure to comply with safe and healthful work practices.



COMMUNICATION

The following is our system of communication, designed to facilitate a continuous flow of twoway (management, supervision and employees) safety and health information in a form that is readily understandable to and between all affected site personnel:

- The CombiMatrix Diagnostics Safety and Loss Control Representatives have responsibility for implementing, administering, monitoring, and evaluating the safety program. Its success depends on the alertness and personal commitment of all. CombiMatrix Diagnostics provides information to employees about workplace safety and health issues through regular internal communication channels such as supervisor-employee meetings, bulletin board postings, memos, or other written communications.
- Some of the best safety improvement ideas come from employees. Those with ideas, concerns, or suggestions for improved safety in the workplace are encouraged to raise them with their supervisor, or with another supervisor or manager, or bring them to the attention of the Safety Officer. Reports and concerns about workplace safety issues may be made anonymously if the employee wishes. All reports can be made without fear of reprisal.
- New worker orientation, including a discussion of site-specific safety and health policies and procedures.
- Follow-through by supervision to ensure effectiveness.
- Workplace-specific safety and health training.
- Safety meetings will be conducted on a monthly basis at our company. These meetings will be short (5 10 minutes), and will cover 1-2 specific subjects. Safety meetings are required by CAL/OSHA in order to successfully communicate important information to employees, as well as promote safety awareness. These meetings will be documented more frequently as deemed necessary by the creation of hazards or occurrence of injuries and illnesses.
- Effective communication of safety and health concerns between workers and supervisors, including language translation where appropriate.
- Site-specific codes of safe work practices.
- Other means we use to ensure communication with employees include:
 - Open communication between management and staff on matters pertaining to safety. All input regarding safety is considered important, and employees are encouraged to actively participate in the company safety program. Employees should feel free to express any safety concerns during safety meetings, individually to supervisors or in writing on the Safety Hazard Notice. All safety suggestions will be given serious consideration and each will receive a response. In turn, the company will provide current safety news and activities, safety reading materials, signs, posters and a bulletin board for easy access to information.
 - Regular safety meetings will be held so that all employees have an opportunity to receive safety training and voice personal opinions regarding safety and health matters.



Yes, our organization elects to use a labor/management safety and health committee meeting all the requirements of $\underline{\text{T8CCR } 3203\ (7)(c)(1) - (7)}$ to comply with the communication requirements of subsection (a)(3) of T8CCR 3203 by communicating and instructing employees orally in:

• General safe work practices with specifics with respect to hazards unique to the employees' job assignment.

HAZARD ASSESSMENT

Periodic inspections to identify and evaluate workplace hazards shall be performed by the safety officer and/or management team according to the following schedule:

- When our Injury and Illness Prevention Program was first established;
- When new substances, processes, procedures or equipment that present potential new hazards are introduced into our workplace;
- When new, previously unidentified hazards are recognized;
- When occupational injuries and illnesses occur;
- When we hire and/or reassign permanent or intermittent workers to processes, operations, or tasks for which a hazard evaluation has not been previously conducted; and
- Whenever workplace conditions warrant an inspection.

Periodic inspections consist of identification and evaluation of workplace hazards utilizing applicable sections of the attached Hazard Assessment Checklist, and any other effective methods to identify and evaluate workplace hazards.

ACCIDENT/EXPOSURE INVESTIGATIONS

Investigation of workplace accidents, hazardous substance exposures and near-accidents will be done by the Safety and Loss Control Representatives. Accident investigation is a systematic method for collecting factual information that makes it possible to accurately reconstruct the accident and determine the underlying reasons for the cause of the accident. The investigation is fact-finding, not fault finding. Once the primary causes for the accident have been determined, preventative measures can be identified and effectively instituted. Each supervisor has a prominent role in conducting an accident investigation. The responsibility for conducting an accident investigation includes collecting the facts, determining the sequence of events that resulted in the accident, identify action to prevent recurrence, and provide follow-up to ensure that corrective action was effective.

All accidents should be investigated promptly regardless of their severity. Promptness of the investigation is essential since conditions at the accident scene change. Moreover, witnesses are more likely to relate circumstances as they were, without the added conjecture that comes late from discussions of the accident with other employees. Promptness in checking the scene assures employees that management is highly concerned for their well-being. The type of investigation depends on the nature and magnitude of the accident. Each department supervisor/manager shall



promptly investigate, thoroughly analyze, and report in writing to the safety officer and Management team all accidents involving personal injury and/or property damage or the potential there for, once they occur. Accident investigation reports shall be submitted within 24 hours of the first notice to the supervisor/manager., and will include:

- Visiting the scene as soon as possible;
- Interviewing affected workers and witnesses;
- Examining the workplace for factors associated with the accident/exposure/near-accident;
- Determining the causes of the accident/exposure/near-accident;
- Taking corrective action to prevent the accident/exposure/near-accident from reoccurring; and
- Recording the findings and corrective actions taken on the attached OSHA Form 301.

HAZARD CORRECTION

Unsafe or unhealthy work conditions, practices or procedures at our work facilities shall be corrected **in a timely manner** based on the severity of the hazards, and according to the following procedures:

- When observed or discovered;
- When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, we will remove all exposed workers from the area except those necessary to correct the existing condition. Workers necessary to correct the hazardous condition shall be provided with the necessary protection; and
- All such actions taken and dates they are completed shall be documented on the attached Identified Hazards and Correction Record.

TRAINING AND INSTRUCTION

All workers, including management, supervisors, and lead personnel shall have training and instruction on general and job-specific safety and health practices. Training and instruction shall be provided as follows:

- When the IIPP is first established;
- To all new workers;
- To all workers given new job assignments for which training has not previously provided;
- Whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard;
- Whenever we become aware of a new or previously unrecognized hazard;
- To supervisors to familiarize them with the safety and health hazards to which workers under their immediate direction and control may be exposed; and
- To all workers with respect to hazards specific to each employee's job assignment.



This training will include (but is not limited to):

- Explanation of our IIPP, emergency action plan and fire prevention plan, and measures for reporting any unsafe conditions, work practices, injuries and when additional instruction is needed.
- Availability of toilet, hand-washing, and drinking water facilities.
- Provisions for medical services and first aid, including emergency procedures.
- Proper housekeeping, such as keeping stairways and isles clear, work areas neat and orderly, and promptly cleaning up spills.
- Prohibiting horseplay, scuffling, or other acts that adversely influence safety.
- Proper storage to prevent:
 - o stacking goods in an unstable manner
 - o storing materials and good against doors, exits, for extinguishing equipment and electrical panels.

Where applicable our training may also include:

- Prevention of musculoskeletal disorders, including proper lifting techniques.
- Use of appropriate clothing, including gloves, footwear, and personal protective equipment.
- Information about chemical hazards to which employees could be exposed and other hazard communication program information.
- Proper food and beverage storage to prevent them from becoming contaminated.

In addition, we provide specific instructions to all workers regarding hazards unique to their job assignment, to the extent that such information was not already covered in other training.

RECORDKEEPING

Written IIPP and Documentation Requirements

Our organization has taken the following steps to implement and maintain our IIPP:

Our organization has ten or more employees and keeps records as follows:

Records of scheduled and periodic inspections including the person(s) conducting the
inspection, the workplace hazards (i.e., unsafe conditions and work practices that have
been identified) and the action(s) taken to correct the identified unsafe conditions and
work practices, are recorded on the Hazard Assessment Checklist, the Identified Hazards
and Correction Record and the Investigation/Corrective Action Report. These records are
maintained for at least one (1) year.