

Occupational Safety and Health Act of 1970, 6257

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1.0 POLICY OVERVIEW, PURPOSE AND SCOPE

OneMain (the "Company") complies with all requirements of the Occupational Safety and Health Act (OSHA).

This policy defines the principles and guidelines that govern compliance with federal, state and local OSHA statutes and applies to all team members.

2.0 RELATED POLICIES, PROCEDURES, STANDARDS AND FORMS

This policy assumes a familiarity with the following:

POLICY/PROCEDURE/STANDARD/FORM	Reference	POLICY/PROCEDURE/STANDARD/FORM	Reference
Environmental Issues	6204	Incident/Injury Report	Form
Injuries at Work	1202	Injury and Illness Prevention Program	Form
Team Member Communications	7204		

3.0 POLICY REQUIREMENTS

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3.1 BACKGROUND

Compliance with OSHA and additional state and local statutes is required as follows:

- A. OSHA
 1. OSHA is the principal federal law regulating safety and health in the workplace.
 2. OSHA requires employers to provide hazard-free workplaces for their team members and to comply with OSHA standards, rules and regulations.

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B. State and Local

1. Individual states and localities may also have occupational safety and health statutes or workers' compensation laws that differ from OSHA.
2. In situations where an employer is subject to OSHA and state laws, the employer must comply with both.
3. Compliance with OSHA is not a substitute for compliance with state requirements.

3.2 ROLES AND RESPONSIBILITIES

Role	Responsibility
President and Chief Executive Officer (CEO)	<ul style="list-style-type: none"> • Ensures that a program for OSHA compliance is established, including designating an OSHA compliance representative and an OSHA compliance facilities manager
OSHA Compliance Representative	<ul style="list-style-type: none"> • Responds to OSHA investigations • Directs Realty Services to answer any OSHA investigation • Ensures Human Resources (HR) complies with OSHA's posting and reporting procedures
OSHA Compliance Facilities Manager	<ul style="list-style-type: none"> • Writes and maintains written procedures for all facilities to comply with OSHA standards

The Vice President-Managing Director, General Services and Facilities, serves as both the Company's OSHA compliance representative and the compliance facilities manager.

3.3 COMPLIANCE

The Company's OSHA compliance representative is responsible for the following actions to ensure compliance with the Act:

A. Posting Requirements

1. The Job Safety and Health Protection Poster is posted in a prominent place in each establishment.
2. Prominent place is interpreted to mean a place where all team members are likely to review the poster within a reasonable period of time.

B. Incident Reporting

1. All work-related injuries must be reported to HRConnect at 800-804-8502. Refer to [Injuries at Work, 1202](#) for related insurance reporting procedures.
2. Team members must report to the nearest OSHA area director or the appropriate state authority by phone or fax under the following circumstances:

a. Job-Related Deaths

Job-related deaths must be reported within eight hours of the time the Company learns of the incident.

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b. Hospitalization of a Team Member

When a team member is hospitalized because of a work-related incident, a report must be made within eight hours after the Company learns of the incident.

3. Required Incident Report Information

Each report required by these regulations must include the following information on the [Incident/Injury Report](#) form:

- Establishment name
- Location of incident
- Time of incident
- Number of fatalities or hospitalized team members
- Contact person and phone number
- Brief description of the incident

4. Deaths and hospitalizations must be reported promptly to the OSHA 24-hour toll-free number, 800-321-OSHA.

C. Survey

1. OSHA may require an employer to participate in a statistical survey of occupational injuries and illnesses.

a. The data for the survey is compiled using work-related injury information from the HR Department.

b. OSHA notifies employers who have been selected and supplies necessary forms and instructions.

2. OSHA summary information must be maintained in HR for five years following the end of the year to which they relate.

D. Notice Regarding Access to Team Member Exposure and Medical Records

1. A team member who is regularly exposed to toxic substances or harmful physical agents is informed, upon entering employment and annually thereafter, of their right of access to any medical records the Company maintains regarding the team member.
2. Appendix A is a sample notification memo. This right to access includes first aid records, the results of pre-employment physical examinations and any medical and employment questionnaires or histories.
3. The results of exposure tests (e.g., air sampling or noise levels) performed in areas where team members work must be made accessible.
4. A copy of the Department of Labor regulations concerning the right of access is maintained by the Company and made available to team members upon request.

3.4 DOCUMENTATION

The Company's OSHA compliance facilities manager maintains required procedures in compliance with OSHA standards.

A. Hazard Communication

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Each OneMain company that purchases, stores or uses hazardous chemicals must establish a Hazard Communication Program to transmit information on the chemicals by means of labels on containers, material safety data sheets and formal training programs. Refer to [Environmental Issues, 6204](#).

B. Asbestos

Each OneMain company that has asbestos-containing materials must have an operations and maintenance plan for their building.

3.5 INSPECTIONS

OSHA investigates workplace hazards by letter, phone or on-site inspection. On-site OSHA investigations include:

A. Commencement of Investigation

1. OSHA investigators generally perform inspections without advance notice.
2. The investigator is directed to Realty Services.

B. Request for Warrant

1. The OSHA investigator presents credentials and the Company requests permission to make a copy of the credentials for our records. If the request is denied, the Company notes the OSHA investigator's name.
2. The investigator is asked the purpose of the visit, including the location(s) and type(s) of alleged safety or health violation(s).
3. The investigator is informed the Company does not permit inspections without warrants.
4. When a warrant is not produced, the Company representative terminates the interview until the investigator produces a warrant.

C. Presentation of Warrant

1. When a warrant is produced, an attorney from the Company's Legal Department reviews the document as quickly as possible.
2. When, in the attorney's opinion, the warrant is flawed or otherwise insufficient, the attorney meets with the investigator and presents the Company's objections.
3. When the attorney raises no objections, the warrant is returned and the inspection permitted in strict compliance with the warrant.
4. The consulting attorney need not be present during the inspection, but remains accessible in case legal questions arise.

D. Team Member Interviews

1. The inspector may ask to privately interview selected team members.
2. The interviewing of team members, as well as the inspection in general, is conducted in a manner that does not unreasonably disrupt the Company's operations.
3. When the Company representative considers the number of team members to be interviewed or the anticipated length of the interviews is excessive, the Legal Department is contacted for an opinion before the interviews begin.

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E. Inspection

1. The investigator is permitted to inspect all conditions, structures, machines, apparatuses, devices, equipment and materials found in the workplace within the parameters of the warrant.
2. The investigator is accompanied at all times by the Company representative and, when necessary, a member of management who is able to respond to technical questions. Environmental samples and photographs are permissible.
3. The Company's OSHA posters and written procedures regarding compliance with OSHA programs, including its Access to Team Member Exposure and Medical Records policy, may also be reviewed. Refer to [Team Member Communications, 7204](#) and [Appendix A](#).
4. Upon completion of the inspection, the investigator is escorted out of the building and the Law Department notified the inspection has ended.

3.6 VIOLATIONS AND MISREPRESENTATIONS

OSHA violations and misrepresentations are subject to the following citations and penalties:

A. Citations

1. The Secretary of Labor or an authorized representative may issue citations to employers who are believed to be in violation of OSHA.
2. The OSHA area director determines if a violation has occurred.
3. After a review of the inspection report, the area director may issue a citation or, if the violations have no direct or immediate relationship to safety or health, a notice of violation.
4. An employer cited for violations has 15 days to notify the Secretary of Labor of any intention to contest the citation or face enforcement proceedings through the assessment of penalties.

B. Penalties

1. Failure to provide OSHA with timely notification may result in civil penalties of up to \$70,000 for each violation in addition to imprisonment for up to six months.
2. Per section 17(g) of the statute, OSHA assesses a \$10,000 fine for anyone knowingly making any false statement, representation or certification in any application, record, report, plan or other document filed or required to be maintained pursuant to OSHA.
3. Section 17(l) provides that, if an employer violates any OSHA posting requirement, a civil penalty of up to \$7,000 for each violation may be assessed.

3.7 QUESTIONS

Questions may be referred to the Vice President-Managing Director, General Services and Facilities.