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1 Purpose:

This Emergency Action Planning Standard outlines Silver Eagle Distributors Houston, LLC's (Silver Eagle Houston) requirements for branch-specific Emergency Action Plans (EAPs) that cover all operations and are aligned with the requirements of 29 CFR 1910.38. This Standard provides the framework for preparing for, responding to, and recovering from non-routine incidents, regardless of the nature or severity.

While the routine functions of most departments are not of an emergency nature, all employees of Silver Eagle Houston should be prepared in their respective capacities to respond to emergencies that may threaten life, the environment, company assets or service to customers. This includes a day-to-day obligation to assess and report on any potential/actual emergency or disaster event. It requires monitoring conditions and analyzing information that could signal the onset of one of these events.

2 Scope

This Standard exists to ensure a coordinated response by Silver Eagle Houston personnel to a non-routine event that may exceed the capacity of the affected department(s) or organization. Situations include but are not limited to those emergencies that may affect any Silver Eagle Houston employees, the public, the environment, Silver Eagle Houston assets or services to customers.

This includes, but is not limited to, events such as:

- Operational disruptions
- Natural disasters
- Environmental emergencies
- Human-caused events (accidental or intentional)
- Security related events

3 Definitions.

As used in this Standard, the following terms shall have the meanings set forth below:

Emergency Situation - As used in this Standard, this term is intended to describe a range of situations, from an incident to a major disaster.


Emergency Action Plan (EAP) - A formalized and branch specific plan that details the roles, responsibilities, actions, contacts, and response required to address emergency scenarios. The development and utilization of the EAP should reflect Silver Eagle Houston's response priorities as follows:

Priority 1: People - Protect employee and public safety

Priority 2: Assets - Minimize damage to property and ensure safe systems for continued operation

Priority 3: Restoration - Minimize service disruptions to customers and supply chain disruptions

Priority 4: Environment - Minimize damage to the environment

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Emergency Response Team (ERT) - A core group of Branch-assigned employees trained and competent to respond to an emergency situation who are prepared to fulfill specific and assigned roles and responsibilities required by specific emergency scenarios.

Corporate Crisis Management Team (CCMT) - An internal team that provides direction and expertise during the emergency response activities and business continuity efforts. This team will consist of executive representation from: Sales, Operations, Fleet, Corporate Affairs, HSE, Facilities, HR, IT and Legal.

Risk Assessment - A document that helps branch locations to identify and prioritize local hazards, situations, processes, etc., that may cause harm or possess the potential to adversely affect employee health and safety, public or private property, or the environment. A risk assessment contains three parts:

- Identify hazards and risk factors that have the potential to cause harm (Hazard identification).
- Analyze and evaluate the risk associated with that hazard (Risk analysis and Risk evaluation).
- Determine appropriate ways to eliminate the hazard or control the risk when the hazard cannot be eliminated (Risk control).


4 Responsibility/Accountability

4.1 Emergency Response Team (ERT)

4.1.1 Market Manager

The Market Manager is a critical member of the ERT and is responsible for:

- Activating the Emergency Action Plan (EAP).
- In conjunction with HSE Department, reviewing the EAP annually for changes and/or modifications.
- Coordinating the activation and overseeing the implementation and maintenance of the branch's EAP.
- Establishing a working relationship with local authorities that may respond to an incident at their branch location. Will likely require support from HSE and Facilities.
- Facilitating all emergency communications and overseeing the release of information.
- If responsible for remote depots, ensuring suitable and timely care in the event of an emergency or immediate risk to a person's life or long-term health.
- Upon report of "All Clear" from emergency responders (internal and external), allowing personnel to return to the branch to resume operations, begin clean-up activities, or follow their supervisors' instructions.

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4.1.2 Warehouse Manager

The Warehouse Manager is a critical member of the ERT and is responsible for:

- Activating the Emergency Action Plan (EAP).
- Overseeing energy control devices and utility shutoffs in their area and ensuring branch personnel are familiar with the operation of controls. Will likely require support from HSE and Facilities.
- Ensuring that procedures are in place and followed in order to maintain temporary power during an emergency situation, with support as needed from HSE and Facilities.
- Checking and reviewing the medical supplies and first aid kits at the branch.
- Ensuring that signs are clearly visible to identify the location of safety equipment (e.g. fire extinguishers) in their work areas.

4.1.3 Fleet Manager


The Fleet Manager is a critical member of the ERT and is responsible for:

- Ensuring that all drivers with vehicles are thoroughly familiar with potential evacuation routes, assembly areas, safe havens, etc.
- As a contingency plan, identifying one or more vehicles that can be used for transport of injured personnel if external emergency medical response is delayed.
- Based on the type of emergency, and if it can be done safely, ensuring all vehicles are moved away from branch.
- Ensuring that signs are clearly visible to identify the location of safety equipment (e.g. fire extinguishers) in their work areas.

4.1.4 Office Manager/Administrator

The Office Manager/Administrator is a member of the ERT and is responsible for:

- Providing assistance during the evacuation of branch personnel.
- Maintaining a list of names and contact information for the branch Emergency Response Coordinator (ERC), and zone/emergency wardens.
- Maintaining current evacuation and hazard maps in accessible locations throughout the branch for the life of the branch.
- When applicable, securing all office electronics. May require assistance from IT.

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4.1.5 Emergency Response Coordinator (ERC)

The role of Emergency Response Coordinator (ERC) will be assigned at the discretion of the ERT and HSE Department based on the branch risk assessment and characteristics of the branch. The ERC is responsible for:

- Initiating and supervising the partial or total evacuation of their assigned work area.
- Directing employees and visitors to safe areas inside the branch when severe weather threatens.
- Directing personnel to notify applicable emergency services (i.e. ambulance, police and fire department).
- Serving as the zone/floor focal point for communications during an emergency, including:
 - Obtaining an accurate physical headcount and providing crowd control within their designated muster/safe areas, and
 - Having emergency equipment on hand or readily available and fit for service.


Based upon Branch assignment, a member of the ERT may also serve as ERC.

4.1.6 Human Resources Department

Human Resources is responsible for:

- Ensuring that casualties and evacuees are accounted for and provided with the appropriate care and attention.
- Notifying an employee's emergency contacts of the employee's involvement in the incident. The involvement notice is only given to their emergency contacts when confirmation has been received by the appropriate agency.
- Supplying information about employees to the relevant authorities, including the emergency response personnel.
- Liaising with employees (evacuees and injured personnel), relatives and friends of employees and the emergency response personnel as applicable.
- Organizing accommodation, transport, clothing, cash, food, and shielding individuals from unwelcomed media attention.
- Ensuring personnel contact information is current.

Based on branch assignments, one or more Human Resources representative may be assigned as a member of the branch ERT.

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4.1.7 HSE Department

The HSE Department is responsible for:

- Ensuring each Branch location is in compliance to the requirements of this Emergency Action Planning Standard.
- Checking and reviewing the medical supplies and first aid kits at the branch.
- Conducting a periodic branch Risk Assessment to include availability and accessibility of fire extinguishers, first aid kits and spill response kits.
- Training employees on their duties under this plan.
- Ensuring that an adequate number of branch employees are trained in CPR & First Aid.
- Coordinating an assessment of the incident to determine any damage that the branch may have sustained as a result of an incident and/or how long authorities estimate employees will be unable to enter or use the branch.
- Upon completion of actual emergencies and all drills/exercises, conducting an After-Action Review within five business days to analyze the effectiveness of the Emergency Action Plan and ensuring that any issues arising are addressed at each branch.


Based on facility assignments, an HSE Department representative may be assigned as a member of the branch ERT.

4.2 Employees

All Silver Eagle Houston employees are responsible for:

- Attending emergency response training/drills appropriate to his/her area of work responsibility, including refresher training as necessary, but at a minimum annually.
- Immediately calling 911 and notifying the ERC or office manager after first noticing an emergency situation.
- Following evacuation orders by calmly exiting through the closest safe exit and assembling at the designated safe or muster area.
- Ensuring that their personal information is kept up to date in HRMS/UtiPro.


Employees whose jobs require them to be in Company vehicles must leave their cellular telephone or radios on at all times in order to be informed of the appropriate course(s) of action.

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4.3 Corporate Crisis Management Team (CCMT)

The Corporate Crisis Management Team will be activated, as needed, to provide support for individual branches during limited-scale emergencies and to provide broad corporate direction before, during and after larger scale emergencies. Responsibilities shall be generally as follows:

- Sales – Responsible for overall logistics and customer support activities and ultimate decision making on complete facility closures, temporary transportation re-routes and hours of service changes.
- Operations – Responsible for managing and minimizing disruptions to warehousing, shipping and receiving operations and supply chain and restoring their full operational function after an emergency.
- Fleet – Responsible for ensuring each branch’s fleet has the resources needed to properly prepare for and respond to emergency situations and for reallocating fleet resources to minimize disruptions to deliveries.
- Corporate Affairs – Responsible for communicating necessary information to the media, the public, other external stakeholders and, as appropriate, employees at unaffected branches. Serves as a primary point of contact for external inquiries.
- Health, Safety & Environmental (HSE) – Responsible for providing risk-based guidance on operational sustainability matters and current information on pending weather events, including orders or advisories issued by local government. Will also develop and maintain a detailed log of events as they occur chronologically until an emergency event has been resolved.
- Facilities – Responsible for each branch’s physical building and structures, including facility access, security, HVAC systems, utilities and interacting with municipal regulators and contractors.
- Human Resources (HR) – Responsible for communicating necessary information to employees regarding the emergency and recovery efforts and ensuring support to affected employees is provided timely.
- Information Technology (IT) – Responsible for ensuring IT assets and infrastructure are adequately protected in the event of an emergency and IT services are restored in a timely manner afterward.
- Legal – Responsible for serving as the corporate link to government agencies and advising on legal issues that may arise from the emergency.

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5 Planning/Preparedness

5.1 Emergency Response Team

Each branch Emergency Response Team shall consist of the Market Manager, Fleet Manager, Warehouse Manager, Office Manager / Administrator and Emergency Response Coordinator.


Prior to the occurrence of an incident, the Emergency Response Team will:

- Conduct a branch specific risk assessment of actual, assumed, or potential risks to the personnel and operations.
- Engage with local emergency response services to share the scope of their operations and the types of emergency operations at their location.
- Develop emergency evacuation routes to ensure that employees and visitors can quickly exit the branch following an incident requiring evacuation.
- Designate muster areas outside the branch where employees and visitors are to assemble following an emergency evacuation. (Note: The muster area locations should be established so as not to interfere with local authorities responding to the incident.)
- Ensure that the evacuation routes, emergency procedures, and emergency telephone numbers are posted and clearly visible at all exits.
- Designate an employee who will monitor local weather news and bulletins whenever a "watch" condition is declared for the local area.
- Coordinate with the HSE department to plan training exercises and test evacuation plans.

5.2. Emergency Command Center

Each Branch Emergency Action Plan will identify a primary and alternate emergency command center. The command center should be equipped with:

- Phone system,
- 2-way radios,
- Television,
- Branch EAP binder,
- Computer access, and
- Access to personnel records

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6 Execution of Emergency Procedures

During the occurrence of an emergency, the ERT will reference the relevant section of the Branch EAP binder for guidance on actions to be taken. The binder contains eleven individual procedures applicable to specific emergency scenarios. These procedures are:

- SED-CORP-HSE-3-02 - Active Shooter Procedure
- SED-CORP-HSE-3-03 - Bomb Threat Procedure
- SED-CORP-HSE-3-04 - Civil Disturbance Procedure
- SED-CORP-HSE-3-05 - Workplace Violence Procedure
- SED-CORP-HSE-3-06 - Fire Procedure
- SED-CORP-HSE-3-07 - Medical Incident Procedure
- SED-CORP-HSE-3-08 –Release & Spills Procedure
- SED-CORP-HSE-3-09 - Severe Weather Procedure
- SED-CORP-HSE-3-10 - Hurricane Procedure
- SED-CORP-HSE-3-11 – Power/System Outage Procedure
- SED-CORP-HSE-3-12 - Shelter in Place Procedure


7 Post Incident Considerations

6.1. Incident Recovery

Recovery activities should be initiated as soon as possible, preferably while response operations are still underway. Recovery/business continuity planning should be considered along with actions taken during response operations whenever possible.

Recovery operations include, but are not limited to the following:

- Assisting employees
- Assessing structures
- Repairing or replacing structures
- Coordinating the restoration of utilities such as electricity and telecommunications
- Clearing access routes
- Restoring damaged units to production
- Maintaining the safe work zone perimeter
- Cleaning up debris

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- Investigating and reporting (with the assistance of an investigator if required)
- Consultation with regulatory authorities where required

Damage assessment and incident site clean-up should begin as soon as it is deemed safe and possible.

6.2. After-Action Reviews

All emergency incidents are to be reported to the appropriate internal and external authorities. All incidents will be thoroughly investigated to ensure that root causes are properly identified and, if applicable, any corrective actions and/or prevention measures have been implemented to avoid recurrence. The HSE Department will be available to conduct these investigations and will, on occasion, utilize external services on an as-needed basis.

Particular care must be exercised with every emergency involving a fatality, serious injury or significant damage to Silver Eagle Houston or public property. This is to ensure that all evidence is preserved in its original state and the custody transfer is done appropriately. Evidence will not be distributed until permission is granted, custody transfer specifics have been clarified by Silver Eagle Houston’s insurance and legal representatives, as well as any other government or regulatory agencies involved.

An After-Action Review (AAR) is to be conducted by the Emergency Response Team and other stakeholders, as required. This will include a review of the activated emergency response plan(s) with updates as required to address any identified gaps or areas for improvement.

8 EAP Administration


- 7.1. All EAPs will be reviewed on an annual basis, in accordance with regulatory requirements, or as significant changes in regulations or key personnel occur.
- 7.2. Each Branch Department Manager is responsible for the plan(s) pertinent to their operations and will be responsible for ensuring that any changes required are communicated to the HSE department. These changes will be included in the regular revision or as required by regulation.
- 7.3. In addition to the annual review, changes may arise from training sessions, exercises, regulatory changes or requirements, After Action Reviews or as needed. Change requests will be analyzed and included in the upcoming revision when applicable or appropriate. If critical changes are required, a mid-year update may be issued.
- 7.4. Controlled copies of each branch EAP will be distributed together with this Emergency Action Planning Standard. Documents will be distributed per the Distribution List in each branch EAP.

9 Training and Drills

8.1. Training

Each Emergency Response Team, with the support of HSE, is accountable to ensure that all employees at their location receive appropriate training on the relevant emergency action plans. Training will include but will not be limited to:

- Introductory emergency preparedness training,
- Fire and tornado drills,

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- Sheltering-in-place,
- Lockdown, and
- Fire extinguisher training.

All employees should read through all sections of this plan to familiarize themselves with the requirements.

8.2. Drills

Drills are small-scale exercises, usually limited to one building, and are used to ascertain the response of the occupants to a potential emergency. Each branch location shall plan, schedule, and conduct drills to reinforce the requirements of their EAP with all personnel at the facility.

An emergency response drill intended to test or reinforce knowledge of the plan, process, and personnel shall be conducted and documented **quarterly**, at minimum. At least one of the quarterly drills shall include a building fire drill. Quarterly drills shall be documented on the Emergency Response Drill Record (SED-CORP-HSE-4-005).


The following steps must be addressed:

- To ensure comprehensive preparedness and response, the quarterly drills shall be planned and executed to simulate different types of credible emergency scenarios as identified in the branch risk assessment.
- Branches shall plan, schedule, and conduct an emergency response drill intended to fully simulate an emergency scenario, including full evacuation of all employee annually, at minimum.
- Following any drill, or actual or perceived emergency situation, all members of the pertinent emergency response team shall meet and conduct an after-action review to discuss the details of the response and document the lessons learned from before, during, or after the response.

8.3. Visitors and Contractors

All visitors and contractors, regardless of the length of time spent on Silver Eagle Houston property, will receive a basic safety orientation, conducted by the Silver Eagle Houston host / primary contact that will cover the following:

- Sign-in and sign-out procedures,
- Hazardous and prohibited areas,
- Personal protective equipment requirements,
- Emergency alarm system,
- Emergency exit routes, and
- Emergency muster areas

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10 References and Support Documents

OSHA 29 CFR 1910.38

Emergency Procedures:

- SED-CORP-HSE-3-02 - Active Shooter Procedure
- SED-CORP-HSE-3-03 - Bomb Threat Procedure
- SED-CORP-HSE-3-04 - Civil Disturbance Procedure
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- SED-CORP-HSE-3-11 – Power/System Outage Procedure
- SED-CORP-HSE-3-12 - Shelter in Place Procedure

Forms:

- SED-CORP-HSE-04-005 - Emergency Response Drill Record Form
- SED-CORP-HSE-04-003 - EAP Risk Assessment Form
- SED-CORP-HSE-04-006 - Emergency Contact Cover Form

11 Document Revision Register

Revision #	Section #	Date	Revision Description
0		08/01/2019	Initial Release