The requirements and policies described in this document are set forth in an effort to provide a safe and efficient environment for all individuals working at the project site. The term "Subcontractor" shall be defined as any entity, including employees or suppliers thereof, that provides labor, equipment or materials to or on behalf of William H. Lane Incorporated at the project site. Subcontractors in non-compliance with these requirements and policies, as determined by William H. Lane Incorporated, will be directed to leave the project site until the non-compliance issue(s) are rectified. All costs incurred by William H. Lane Incorporated and the respective subcontractor as a result of termination for non-compliance will be the sole responsibility of the subcontractor.

All tiers of Subcontractors shall comply with the requirements established in OSHA 29 CFR 1926, all applicable State and Federal Laws, local ordinances, rules, and regulations bearing on the safety of persons and property.

Each Subcontractor is responsible for the safety and health of their employees and the employees of all their tiers of Subcontractors.

#### A. <u>Safety Programs</u>

Each Subcontractor shall maintain at the project site a written Environmental, Safety, and Health Loss Prevention Plan that includes a written Hazard Communication/Employee Right-to-Know Program which conforms to the requirements addressed in 29 CFR 1926, on the jobsite. Each Subcontractor's Environmental, Safety, and Health Loss Prevention Plan shall be the governing document that all their tiers of Subcontractors shall comply with.

### B. <u>Hazard Analysis</u>

Prior to the start of any construction activity, a Hazard Analysis shall be completed by each Subcontractor and William H. Lane Incorporated will be advised in writing of any unusual site safety issues that may need to be addressed.

#### C. Record Keeping and Files

Each Subcontractor shall ensure that the following documentation is maintained and available for review at the site at all times.

- A written Safety and Health Loss Prevention Plan which includes a Hazard Communication/Employee Right-to-Know Program.
- Material Safety Data Sheets conforming to the Contractor's Hazard Communication Program.
- Jobsite safety meeting reports, including lesson plans which detail training.
- Accident investigations, including accident reports, witness statements, employee statement, any doctor correspondence, and pictures of the accident scene.
- Temporary Alternate Duty (TAD) job descriptions.

### D. Accident Investigations

All injuries shall be reported to William H. Lane Incorporated immediately. Each Subcontractor shall complete and submit an Accident Investigation Report (see attached) for any injury, no matter how minor for their company's employees and the employees of their Subcontractors. A WRITTEN ACCIDENT REPORT SHALL BE COMPLETED WITHIN 24 HOURS OF THE ACCIDENT. The following information shall be included with the accident report:

- Injured employee's name and employer.
- Date, time and location of accident.
- Employee statement explaining accident.
- Witness statement explaining what they saw or their involvement.
- Pictures of the accident scene and description of the weather conditions at the time of the accident.
- All doctor information from initial medical evaluation.
- For any follow-up visits, the paperwork shall be forwarded immediately.
- Doctor "Full Duty" release. NOTE: MANDATORY TO RETURN TO WORK AT THE SITE.

All employees shall be taken to a medical provider for diagnosis of all injuries no matter how minor they are, unless an emergency exists. A doctor's "return to work" slip is required before that person goes back to work (TAD or "full-duty" work status). Forecasting of "return-to-work" shall not be acceptable.

Any Contractor who willfully delays the reporting of an accident as outlined in this section could be subject to termination of contract, work stoppage, delay in Pay Application, and/or other penalties.

- If an employee refuses medical attention, the following shall occur.
  - The employee shall provide a written signed statement as to why they are refusing medical attention.
  - The Contractor shall restrict access of the employee to the construction site until the employee has been seen by an approved medical doctor and released to "full-duty" or TAD work status for the specific injury received while working on the construction site.

### E. <u>Incident "Near Miss" Investigation</u>

Each Subcontractor shall investigate any incident resulting in a "near miss" which could have resulted in a serious injury or fatality. "Near misses" shall be reported to William H. Lane Incorporated in writing immediately.

#### F. Temporary Alternate Duty (TAD)

Each Subcontractor's designated representatives shall accompany all injured employees to an approved medical treating facility to ensure that the injured employee receives appropriate treatment at the proper facility. The representative will make sure the treating physician is aware of the scope of alternate work (TAD), if any, available to the employee.

 Each Subcontractor shall attempt to make alternative work available on the construction project for injured employees who are permitted by the treating physician to return to work.

#### G. Safety Meetings (Tool Box Talks)

Each Subcontractor shall conduct weekly safety meetings on the jobsite. Attendees and minutes of the weekly safety meetings are to be documented. A copy of the training documentation shall be submitted to William H. Lane Incorporated weekly.

#### **H.** Competent Person Requirements

Each Subcontractor shall designate a competent person(s). The qualifications for competent persons are identified in the various Subparts of OSHA CFR 1926. NOTE: Certain subparts of OSHA have interpretations as to the qualifications and training required to be designated as a competent person (i.e.; Subpart P – Excavations; Subpart L – Scaffolding, etc.).

Prior to any work activity beginning in which OSHA requires a competent person, the Subcontractor shall identify their designated competent person(s) to William H. Lane Incorporated in writing.

### I. <u>Site Policies</u>

1. Alcohol and illegal drug use pose a serious threat to workplace safety and health. Employees who abuse alcohol or drugs are a danger to themselves, co-workers, other contractors and the Owner's assets.

The adverse impact of substance abuse at work has been recognized by the Federal Government and many State Governments. William H. Lane Incorporated is committed to maintaining a "drug-free" workplace as required by all applicable Federal and State Laws. All employees are advised that remaining "drug-free" is a condition of continued employment on William H. Lane Incorporated construction sites.

The use, possession, sale, transfer, acceptance, or purchase of illegal drugs at any time
is strictly prohibited. The use, possession of an open container, person sale, transfer, or
acceptance of alcohol is strictly prohibited. Any violation of this policy will be
grounds for immediate termination and may result in a report to the appropriate law
enforcement authorities.

- No prescription drug shall be used by any person, other than to whom it was prescribed. Such substances or non-prescription (over the counter) must be used only as prescribed or indicated.
- 2. All employees shall be given safety orientation education and awareness training by their supervisors before they start work and must comply with the requirements as written in this document.
- 3. Workers shall report unsafe conditions to their supervisors immediately. No worker shall be required or knowingly be permitted to work in an unsafe place, unless for the purpose of correcting the hazard and then only after all safety precautions have been implemented.
- 4. It is each Subcontractor's responsibility when entering different project work areas to find out what safety precautions are required.
- 5. No one shall knowingly be permitted to work while their ability or alertness is so impaired by fatigue, illness, or other cause that they may expose the individual or others to injury.
- 6. The following circumstances shall require immediate notification to William H. Lane Incorporated's Representatives:
  - OSHA Compliance Officer comes to the jobsite for an inspection.
  - Letter of inquiry from an OSHA Compliance Officer.
  - Any accident resulting in an injury.
  - Any accident involving two or more employees.
  - Any situation which requires emergency rescue from the construction project.
  - Any "near miss" which could have resulted in serious injury or death.
- 7. Suitable clothing for construction shall be worn on the construction site. Shirts with sleeves (at least t-shirt length) and full-length pants shall be required. No Shorts, No Sneakers, and No Tank Tops. Proper leather hard soled shoes and appropriate safety equipment shall be worn at all times.
- 8. All employees on site shall wear hard hats that meet the requirements of ANSI Z89.1-1997.
- 9. All employees on site shall wear safety glasses with side shields which meet ANSI Z87.1-1989 (this includes prescription eye glasses with side shields).
- 10. ANYTIME powdered actuated tools, electric or air-operated grinding tools, electric or air-operated impact tools, power saws, drilling tools, etc. are operated, eye and face protection shall be worn.

- 11. Taglines shall be used on all suspended loads to stabilize the load. Employees shall not use their hands to stabilize the load. All taglines shall be of a continuous length, which are free of knots or other items.
- 12. Seatbelts shall be worn at all times in vehicles including heavy equipment. All heavy equipment shall have rollover protection and seatbelts.
- 13. No one shall ride in a vehicle or mobile equipment unless they are on a seat. Exceptions: Scissors and Boom Lifts. Riding in the back of pick-ups shall not be allowed.
- 14. Only "ABC" fire extinguishers are allowed on the construction site.
- 15. All heavy equipment including: cranes, forklifts, etc. shall have a reverse signal/back-up alarm audible above surrounding background noise.
- 16. The following requirements shall be followed by the steel erector:
  - OSHA approved PPE for fall protection.
  - Steel shall be properly stored and cribbed when brought onto the site. Steel shall be supported by bracing to prevent tipping/leaning or falling.
- 17. When lifting equipment or materials the following shall be adhered to:
  - The **ENTIRE LIFTING RADIUS** shall be flagged/barricaded, with only authorized personnel allowed in the flag area.
  - The operator of lifting equipment shall know the weight of every suspended load, regardless of the size.
  - Stable cribbing shall be used for all lifts.
  - All lift equipment operators shall be experienced and qualified prior to operating any such equipment on the jobsite.
- 18. Excavation work shall be performed in accordance with 29 CFR 1926 Subpart P.
  - Flagging and/or suitable warning devices will be required around all trench and excavation work at least three (3) feet (this distance can be exceeded if site specific requires) from the edge of the excavation.
  - Spoil piles shall be put at least two (2) feet back from the edge of the excavation.
  - A safe means of access and egress shall be provided from excavations regardless of their depth at intervals that provide no more than 25 feet of lateral travel.

- 19. Fall Protection shall be strictly enforced. This shall include:
  - A full body harness that is Class C approved by ANSI.
  - All lanyards shall be shock absorbing and have double locking snap hooks that prevent rollout.
  - Two lanyards shall be utilized anytime a worker must unhook and move to another location. One lanyard shall stay connected to the tie-off point before disconnection and moving.
  - All fall protection components shall be of the same manufacture type when used.
- 20. All lifts shall be identified with the name of the Subcontractor utilizing same in a visible location.
- 21. All aerial lifts shall be operated on a level-working surface. The working surface shall be capable of supporting the weight of the lift without the tires sinking into the surface.
- 22. No tools or materials shall be suspended from the outside of the aerial lift basket. Material that is supported across the railings or the aerial lift, shall be secured in place to prevent it from falling to the ground or floor below.
- 23. In the building, <u>all lifts shall be propane or electronically powered</u>. Gasoline or diesel powered lifts shall not be used in the building. Any changes to this requirement is at the discretion of William H. Lane Incorporated.
- 24. Accessories to all mobile equipment (blades, bucket, stringer bits, etc.) when parked shall be lowered in the down position with ignition keys removed from switch.
- 25. All employees who operate equipment shall be educated in the safe operation of that equipment. Only trained employees shall be allowed to operate that piece of equipment.
- 26. When appropriate, a fire watch shall be stationed to provide coverage for each welding, cutting, and other hot work operations.
- 27. Ladders shall reach three feet above the landing for safe access. All ladders shall be positioned on a stable surface and secured to prevent displacement.
- 28. Work shall be arranged so that the employee is able to face the ladder and maintain a "three point" contact when climbing and working.
- 29. All scaffold shall be equipped with top and mid-rail and toe board.

- 30. All electrical power tools and/or equipment shall be plugged into a ground fault circuit protection (GFCI) at the source of electrical power. All frayed and/or damaged electrical cords shall be removed from service and repaired. Cords shall not be tied into knots.
- 31. All portable generators including generator/welders used on the jobsite shall have a GFCI that is an integral part of the generator. The GFCI shall function properly. The GFCI when tested shall trip between 3mA and the 7mA settings on a multi-range GFCI tester.
  - Any generator, in which the GFCI does not function, shall be tagged and removed from service immediately.
- 32. Equipment stored overnight or longer will have all fuel supply valves shut off.
- 33. When not in use, all propane tanks, including empty tanks, shall be stored and secured in a safe manner outside the building.
- 34. Only UL-approved metal fuel cans with flame arresters and self-closing pour spouts shall be allowed on sight.
  - Fuel cans shall not be stored inside the building or inside trailers. Cans shall be brought inside the building only to fuel equipment and then removed immediately.
- 35. All chemical materials used shall have a Material Safety Data Sheet (MSDS) available for review at the project site.
- 36. Electrical panels shall not be accessed by anyone other than the electrical contractor.
- 37. Damaged or defective equipment shall not be used.
- 38. Flag, barricade, or sign areas to keep employees from exposures to potentially hazardous work conditions.
- 39. Employees shall not remove or bypass any barriers or other protective devices from tools, equipment or hazardous locations. All deficiencies shall be reported immediately to William H. Lane Incorporated in writing.
- 40. All underground electrical utilities shall be located prior to any excavation work occurring. The electrical contractor shall be notified to assist with this location. As-built drawings and electronic location shall be used to locate all underground electrical utilities.
- 41. Clean up and housekeeping shall be top priority. This project shall be kept clean and orderly at all times. The work area SHALL be cleaned as directed by William H. Lane Incorporated.

- 42. Glass containers of any kind shall not be brought onto the construction site.
- 43. Rubber boot protectors shall be provided on all welding leads where they make connections at the welding machine.
- 44. No one will be allowed to move a trailer or any other device for living on site. Mobilization and use of temporary office trailers/facilities shall be coordinated and approved by William H. Lane Incorporated.
- 45. All materials on the construction site shall be stored/staged on dunnage and located in approved areas as designated by William H. Lane Incorporated.
- 46. Permission shall be obtained from William H. Lane Incorporated prior to taking any vehicle into the building.
- 47. Only company owned and insured vehicles shall be allowed on the construction site; all others shall use the employee parking lot designated on the construction site.
- 48. All employees shall conduct themselves in a worker like manner at all times. Horseplay or disruptive activities of any kind shall result in immediate dismissal/removal from the jobsite.
- 49. There will be no smoking/tobacco products, eating, or drinking (with the exception of water) in finished areas.