

1. SAFETY AND OPERATIONAL POLICY

- a. Northstar Communications is committed to providing a safe and healthful workplace for all employees.
- b. Intentional disregard for safety or operational policy will not be tolerated as it can put yourself and those around you in danger which in return subjects the company to enormous fines.
- c. Disregarding safety rules and procedures will result in disciplinary action which may also include termination.

2. EMPLOYEE / MANAGED SUB. RESPONSIBILITY

- a. Northstar Communications is committed to continuous improvement of the safety program for both employees and managed subcontractors. This is designed to provide a safe and healthful workplace for all, but it required participation by EVERYONE.
- b. Each and every employee and managed sub must take responsibility for their own safety and the safety of their coworkers.
- c. The potential for incident should never be underestimated when working within the wireless industry and as a result, when accidents do happen, they can be serious or fatal.
- d. There are many developed rules that have been strategically developed for safety protection at Northstar Communications. Many, but not all of them are covered in this safety training program.
- e. YOU are the most important factor in determining how safe your work area is.
- f. YOU are expected to abide by all safety and operational rules, and are expected to take all precautions to prevent injuries to yourself, coworkers and damage to company property
- g. If you are ever unsure of any procedure, take the time to speak with your project manager and get clarification BEFORE you start said project.
- h. Firearms or explosives are strictly prohibited on ALL Northstar Communications sites.

3. INCIDENT PREVENTION

- a. At no time should you take any action which creates any danger to yourself or others.
- b. You are responsible for identifying and correcting unsafe working conditions. If you should discover an unsafe working condition, correct it if you can, AND report it to your project manager.
- c. Do not enter areas or operate equipment unless you are trained and authorized. Some areas may present a severe hazard if specific precautions are not followed for safe entry.

4. IN THE EVENT OF AN ACCIDENT (INJURY, PROPERTY DAMAGE OR NEAR MISSES)

- a. It is said that for every serious injury or fatality, there are 300 near misses and 29 minor injuries.
- b. *An incident is defined as an unplanned or unexpected event, which results or could result in injury, near miss, property damage or environmental exposure.*
- c. All incidents including near misses and property damage, regardless of how small they seem, MUST ALWAYS be reported to PM. Failure to report incidents will result in disciplinary action.

- d. For managed subs sustaining a work related injury, after reporting to the PM, follow your company's policy for managing work related incidents.
- e. For Northstar Communications employees, workplace injuries are generally covered by Worker's Compensation Insurance. Failure to report incidents and follow established procedures may result in a waiver of your coverage rights.
- f. The safety manager, Jessica Walker, should be contacted for any questions or assistance with reporting and managing incidents while at work.

5. EMERGENCY PROCEDURES

- a. Emergencies - In case of fire, medical or other emergencies, move to a safe location if you are able and contact PM.
- b. First Aid Kits - Are available for use. Make sure you notify safety if any items need to be replenished.

6. FITNESS FOR DUTY REQUIREMENTS

- a. You are required to notify your PM of any temporary, permanent, physical or mental disability which could affect your ability to perform job duties.
- b. You are expected to be fit mentally and physically and without any impairment which could adversely affect safe and competent job performance.
- c. These impairments may be a result of physical illness, mental illness, improper diet, substance abuse, fatigue or stress, etc.
- d. If you are taking any prescription medication, please notify your PM if it has the ability to affect judgment or fatigue.
- e. Northstar Communications is a drug free work environment.
- f. Certain jobs and responsibilities may qualify Northstar Communications employee's for medical surveillance relative to (a) hearing, (b) blood lead or (c) respirator fitness. Consult with safety manager for specifics.

7. WALKING AND WORKING SURFACES

- a. Walking and working surfaces can become slippery based on weather conditions.
- b. Exercise caution when walking and where walking. Debris on the floor as well as weather conditions can result in ankle injuries or falls.
- c. Always try to eliminate the need to walk across uneven surfaces, avoiding them will decrease the risk of injury.
- d. Keep isles, exits and stairways clear of unnecessary debris.



8. DAILY HAZARD ASSESMENT

- a. Always consider your surroundings and ensure that you've completed a hazard assessment per the company's policy.
- b. The hazard assessment form provides an opportunity to assess job steps for hazards and implement appropriate action to take to prevent injuries.
- c. A hazard assessment is required to be done in the following intervals: (a) at the start of each day, (b) with new job scope and (c) and when conditions of the original scope changes.
- d. Forms should be sent to the PM for review at least once a week where they are reviewed for consistency.

9. WORKING AROUND EQUIPMENT AND TRAFFIC

- a. From time to time you may be working around moving equipment and or traffic. Always keep a safe distance & stay visible to operator.
- b. Do not walk within 20-30ft of the operating area of any machine without making eye contact and obtaining an "ok" sign from the operator. Even if the equipment is stopped, they may move without any advanced notice.
- c. Be aware of the operators "blind spots" like the backside of an overhead traveling crane. The operator cannot see you when you are in the area.
- d. Never walk under an elevated load, or close to the back of any load (tractor trailer at the loading dock or Fork lift).
- e. Wear high visibility vests if you are working in roadways, yards or other areas with truck or vehicular traffic.
- f. Use high visibility cones to alert others when working around traffic or construction areas.



10. MACHINE SAFETY

- a. Do not wear loose clothing, jewelry or have long hair in the area of moving or rotating machinery.
- b. Never enter machine areas unless you are trained and authorized. Some areas are not designed for people to enter and may be hazardous when the equipment is operating.
- c. No work will be performed in areas where unguarded machinery exists at a height of less than 7'.
- d. Always keep hands, legs and other parts of the body out of the machine hazard areas such as gears, rollers and chains.



11. THE CONTROLL OF HAZARDOUS ENERGY

- a. Employing lockout devices ensures that a zero energy state is maintained. Lockout is essential for your safety and required by company policy.
- b. When the potential exists to come in contact with electricity or other means of energy, equipment must be secured.
- c. Serious injury or death can occur if equipment is unexpectedly energized.
- d. To ensure that your safety is protected, the following procedures must be followed without exception: (a) Each person exposed to the hazard must place their individual lock on the energy source. There must only be one key for each lock. (b) Only the person who placed the lock may remove it. (c) Check to ensure the equipment is clear before restarting after lockout.



- e. Affected Employee - Those working in an area where lockout operations are being performed.
- f. Authorized Employee - Those employees who have gone through the lock-out / tag-out training.
- g. Tag-outs are only authorized when a lock cannot be placed on an energy source.
- h. It is mandatory that you observe the following: (a) Notify, (b) Shutdown, (c) De-energize, (d) Secure, (e) Relieve, (f) Verify.

12. PROTECTIVE EQUIPMENT

- a. At a minimum, safety glasses, safety boots, and a hard hat are required when performing on site work and or when other work is in progress around you.
- b. Hearing protection is required when performing work which exceeds 85db.
- c. To use earplugs: (a) First be sure that your hands, ears, and plugs are clean. (b) Next, pull outward and upward on your outer ear and insert the rolled plug into the ear canal.
- d. Gloves of the proper type are required when handling sharp objects or chemicals.
- e. Dust masks are permitted when working areas which may be dusty or dirty.
- f. Respirators and SCBA are not permitted until fit testing, medical qualification and training have occurred.
- g. It is mandatory to wear a face shield when using a torch, grinder or abrasive wheel.
- h. There may be more requirements based on your specific job requirement and you are directed to consult your PM to better understand what they are.



13. SIGNAGE AND LABELING

- a. Any chemicals used onsite must be labeled with the HMIS (Hazardous Materials Identification System) label as described below:



- b. As with the HMIS placard, 0 has the least risk while 4 has the highest risk.
- c. The colors mean: (blue) Health, (red) Flammability, (yellow) Reactivity.
- d. All containers are to be properly labeled; if you see a cylinder or chemical that is not, notify your PM immediately.
- e. Avoid prolonged contact with materials such as oils, acids, lubricants, fuels and cleaning solutions.
- f. Material Safety Data Sheets (MSDS) for any chemicals may be using should be reviewed and available.
- g. NFPA 704 M is used to notify firefighters of impending dangers within a structure.



- h. The lower spot is reserved for special hazards such as water reactivity, acids, poisons, etc.

14. HOUSEKEEPING

- a. Clean up after yourself – Everyone must be responsible for their work areas. Take pride in the work you do and always clean up any residual waste that is generated by your project.
- b. Clean up oil or other fluid spills – oils spills must be cleaned up immediately with the proper absorption pads.
- c. Trash should be in disposed of, but may be restricted to certain areas.
- d. Keep food and drinks in designated areas.
- e. Stack and store tools and materials neatly.

15. DRIVING DEFENSIVELY

- a. Ensure that your vehicle is in safe working condition.
- b. Always wear your seatbelt and require your passengers to do the same.
- c. Northstar Communications' safety policy prohibits the use of electronics (cell phones, PDA's, etc.) while operating vehicles, even if you are using hands free mode.
- d. When changing lanes, use mirrors and look over shoulder in conjunction with your peripheral vision to identify if a vehicle may be in your blind spot.
- e. Always make sure that the tires, breaks, steering and other safety sensitive components are regularly inspected and in accordance with specifications as they are the most important components of your vehicle.
- f. Never operate unsafe equipment.

- g. For company owned equipment, ensure that both a pre and post trip inspection is conducted.
- h. Report damages or safety issues immediately to your PM. Non-reporting of damage will not be tolerated.
- i. Keep the engine compartment clean and free of material that will / can burn.
- j. NEVER PICK UP HITCHHIKERS.
- k. Never exceed the speed limit, keep in mind some areas warrant a reduced speed level (school zones, snow, ice, wind, rain, etc.).
- l. Do not load your vehicle to the extent that it inhibits your vision, especially when in reverse.
- m. Always plan your trip and give yourself plenty of time to get to your destination. Speeding is not an acceptable solution for an error in planning.
- n. Aggressive driving is usually defined by one of the following: speeding, tailgating, failure to signal, passing on the right, running red lights, etc. Avoid conflict at all costs.
- o. Do not operate a company vehicle while under the influence of a controlled substance or alcohol.
- p. Alcohol impaired driving accounts for 40% of fatal crashes.



- q. About 3 in 10 Americans will be involved in an alcohol-related crash.
- r. Research shows alcohol is a contributing factor in 39% of all work related traffic crashes.
- s. Distracted driving accounts for about 23-30% of all traffic crashes, that's 4,000 or more per day.
- t. Drowsy driving results in 100,000 crashes each year – 4,000 injuries and 1,500 deaths.
- u. If you are tired, pull into a safe location and take a "power nap" /or/ stop vehicle every two hours and walk briskly to exercise. This will aid in keeping you alert.

16. WORKING NEAR AN ACTIVE RAIL ROAD

- a. Never walk between rail cars. If the rail car moves, you could be killed or seriously injured.
- b. Stay away from the tracks when rail cars are moving and never try to "beat" the train by crossing the tracks.
- c. Do not anticipate that the conductor can hear or even see you if you are in a dangerous area.

17. HAND AND POWER TOOLS

- a. Inspect all tools including the extension cord before each use.
- b. Never use damaged or defective equipment. Damaged tools must be discarded or repaired.
- c. Always use the right tool for the job.
- d. Guards must be on grinders whether they came from the factory equipped.

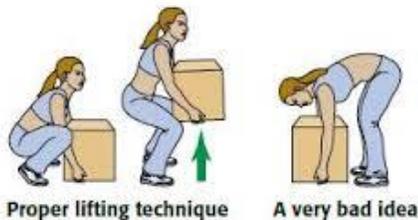
- e. A face shield is required when performing grinding activities and where sparks might develop.
- f. Insulated tools are required to be used when working with potentially energized electrical equipment. This does NOT mean tape...
- g. Never modify tools.

18. MANUAL LIFTING AND MATERIAL HANDLING

- a. Take precautions not to injure your back while trying to lift or move heavy material.
- b. There is not a set limit of lifting capacity as everyone's abilities differ. DO NOT exceed your personal lifting capabilities.
- c. If you need help, just ask. A general rule of thumb is that *a fit male should not attempt to lift more than 50lbs without help.*



- d. Avoid lifting heavy items if a machine or a tool can do the job.
- e. Follow these steps for increased back safety: (a) Pre-plan the lift, the route, etc., and size up the load. (b) Ask for help, especially for heavy or bulky items. (c) Keep your feet apart and comfortably staggered. Squat to lift, do not bend at the waist, and lift with legs. (d) Get a firm grasp on object, and keep it close to your body. (e) Lift object carefully using the leg muscles, ensure you do not jerk the load. (f) Keep head up, while looking straight ahead while making the lift. (g) Maintain a straight posture while walking. (h) Lower object slow and smoothly in a squatting manner, while ensuring you do not twist your back.



19. RF / EME AWARENESS

- a. The human body has many characteristics that give themselves the ability to become an absorber of RF energy.
- b. Frequencies between 30 and 300 MHz present significant problems in regards to absorption.

- c. This resonance tends to heat certain body tissues and organs, thus creating a plethora of different health issues.
- d. Body parts associated with viscous fluid are most susceptible to RF exposure (eyes and testicles).
- e. Sever cases of over RF exposure such as nausea and headaches are often mistaken for the flu. They can also have the same effects as heat stroke. Then, symptoms of overexertion will be noticed such as perspiration, an elevated body temperature and labored breathing. High levels of exposure over a few minutes can make you sick and even cause permanent damages.
- f. While 3' is often used as a rule of thumb to indicate safe distances to be kept from RF sources, it is not exact and as such, posted signs should always be observed.
- g. The human body is an excellent radiator so the immediate effects of heating can dissipate if the individual is removed from RF environment.
- h. If excessive exposure occurs, permanent damage will occur.



20. FALL PREVENTION

- a. When working in an area not protected by a guard rail and the potential for you to fall is greater than 6', it is mandatory that you are protected by a harness or fall protection system.
- b. ALL TIE OFF POINTS MUST SUPPORT 5000LBS.
- c. If you "free climb", you will be terminated. No exceptions.
- d. On roofs with a rise and run ratio of less than 4:12 including flat roofs, work may be performed without fall protection when ALL of the following are in place: (a) A warning line must be used 15' or more from the edge. **Note: a skylight is considered an opening.** (b) The warning line has the minimum tensile strength of 500lbs, can support 16lbs of outward force, is positioned no less than 34" and no more than 39" from the work surface, is equipped with high visibility flags spaced no more than 6' apart. (OSHA standard) (c) All workers understand that they are explicitly prohibited from performing any work or work-related activity in the area between the warning line and the edge or opening.

21. USE MAN LIFTS / SCISSOR LIFTS

- a. Man lifts and scissor lifts are permitted to be used providing all of the following provisions are in place: (a) All employees working with the machine are trained. (b) Equipment safety inspections are performed at least daily to ensure that it is in accordance with manufacturer's specifications. (c) Harnesses are required by those using aerial lifts.
- b. Only one person is permitted per tie off point and all should stay within the basket.

- c. Never tie off to an adjacent structure, always tie off to the points provided.

22. LADDERS

- a. When climbing fixed ladders, always verify they have been recently inspected and are secure structurally (and at the attachment points).
- b. Use caution when moving and placing the ladder to avoid strains and pinches.
- c. Ladders must be used in accordance with the manufacturer's instructions.
- d. All ladders must be made of fiberglass or another nonconductive composition.
- e. Do not utilize steps that are marked with a sticker prohibiting use or climbing beyond a specific point.
- f. Inspect the ladder for good repair (feet, steps, spreaders and rails).
- g. Maintain the rungs free from slip hazards.
- h. Always practice the 3 point rule (two hands and one foot or two feet and one hand in contact with the ladder at all times) and always face the ladder.
- i. Do not exceed the maximum weight load of the ladder.
- j. Do not use an A-frame ladder for two people unless specifically designed for that purpose.
- k. Do not overreach: move the ladder as necessary and don't excessively push or pull from sides.

23. GENERAL ELECTRICAL

- a. Electrical equipment must be in good working order with no frayed cords or other electrical hazards.
- b. Do not use electrical equipment that is unsafe. Take all unsafe equipment out of service and mark visibly.
- c. Extension cords are not to be used as permanent electrical needs. Install hard wiring instead.
- d. Ensure familiarity with any electrical equipment which is being worked on including the appropriate methods in which it should be tested.
- e. Equipment must never be used unless it is UL approved. See example below.



24. CONFINED SPACES / CONTROLLED ENV. VAULT

- a. Confined spaces are locations such as tanks, pits, sewers, and certain equipment.
- b. A confined space is defined as: (a) a space large enough to permit bodily entry (b) Has limited means of access and egress (c) Is not designed for continuous employee occupancy.
- c. Unvented CEV's, or vaults with nonfunctioning ventilation, environmental are those which are suspect are considered confined spaces and MUST NOT be accessed prior to contacting the safety department.
- d. When vaults are opened, the opening must be guarded by a railing, temporary cover, or other suitable temporary means to protect from accidental falls through the opening and to protect employees working in the vault from foreign objects entering the hole.

- e. A person with aid training is required at all times if there is a cause for believing that a safety hazard exists. Traffic hazards, water hazards and facilities jointly operated with power utilities are examples.



25. SITE SECURITY

- a. Identify if the site is located in the red zone area as indicated on the site listing and if special notes require that two technicians are required, or that no night work is permitted.
- b. Ensure that you have a cell phone available with a completely charged battery and preprogrammed contact information.
- c. Discuss with your manager if armed security is warranted.
- d. Park your vehicle as close to the site as possible and if the site is gated, close the gate or door and lock it behind you.
- e. DO NOT leave valuables (tools, laptops, etc.) in your vehicle and always keep it locked.
- f. If you see someone in the area of your work site who looks suspicious, discretely report it to your PM or if appropriate, leave the site, then contact your PM.
- g. Where it appears that illegal activity is occurring, contact the police and do nothing to agitate the situation.
- h. For additional information about the city or location, request that your manager obtain a CAP index report.

26. WORKING AROUND ELEVATED PEOPLE

- a. Whenever possible, through scheduling and preparation, work are elevation should be completed before work crews are allowed to work below.
- b. There may however, be tasks that require work to be performed on the tower and in the compound at the same time.
- c. In those cases communication by signage, by voice, and radio are key in eliminating risk of falling debris, tools, or materials.
- d. Hardhats and safety glasses must be worn at all times on ANY Northstar site.
- e. A good rule of thumb to calculate a fall zone is to take the height of the evaluated work and divide by two. The result is the distance from the center of the tower to the edge of the drop zone.
- f. Placing markers, warning tape, and/or barricades are examples of restricting access while work is being performed up top.
- g. Never walk under a suspended load, or a load that is being hoisted into place.
- h. When the elevated material has been secured above, tower crew must notify ground personnel before resuming work below.
- i. The ground crew must be notified before any hoisting begins either in lowering or raising materials.

