SUBCONTRACTOR SAFETY GUIDELINES AND JOB SITE POLICIES

INTRODUCTION – SUBCONTRACTOR ACCIDENT PREVENTION REQUIREMENTS:

Under all circumstances, it is the goal of CopperRock Construction, Inc (CRC) is to comply with the requirements and intent of federal and state rules and regulations and to provide a safe and healthful work environment for all workers on our jobsites. This Appendix is a limited overview of safe work practices. In addition to complying with this Appendix, subcontractors must also comply with all local, state, and federal rules and regulations. CRC's Subcontractor Safety Handbook is available at their Grand Rapids, MI and Fort Wayne, IN as well as being available at every jobsite. Subcontractors are required to be familiar and comply with CRC's Subcontractor Safety Handbook.

SUBCONTRACTOR RESPONSIBILITIES

Subcontractor responsibilities include, as a minimum, at least the following:

- Understand it is their legal responsibility to comply with all statutory safety and health requirements.
- Prepare a written safety program with details commensurate with the work to be performed.
- Designate a competent supervisor to carry out the subcontractor's safety and health obligations and to administer the on site safety program.
- Maintain accurate accident and injury reports and make those reports available upon request to CRC project management.
- Report all fatal injuries, possible fatal injuries, serious injuries or occupational illnesses to the CRC project management staff immediately upon their knowledge.
- Be responsible for compliance by their employees with the project safety requirements.
- Have in place and use a disciplinary action plan for the enforcement of job rules and safety and health requirements. Provide safe working conditions and procedures for their employees.
- Inform CopperRock Construction, Inc. of any hazardous conditions created by their operations.
- Provide a copy of an on site chemical list and Safety Data Sheet for all materials to be used on the job site to CRC jobsite staff.
- Participate in supervisory and trade safety meetings held by CopperRock Construction, Inc. when work within the scope of their subcontract is in progress, or as contract requirements specify.
- Comply with jobsite-specific issues and exposures that may require more strict requirements.
- Notification of the CRC jobsite staff if any work is to be performed at a time other than the normal working hours as established by the CRC Superintendent.

SUBCONTRACTOR COMPLIANCE/DISCIPLINARY POLICY

Under CRC policy, all subcontractor employees are required to follow subcontractor and CRC safety policies and operating procedures. The discipline policy of CRC is intended to encourage subcontractor employee compliance with the CRC Accident Prevention Program. When needed, the subcontractor shall provide their employees with additional training and information, or re-training to maintain their knowledge.

CRC reserves the right to remove subcontractor employees from the jobsite "at will." Any subcontractor employee(s) found performing work in an unsafe manner that could endanger the employee or any other worker may be subject to the CRC discipline policy.

CRC recognizes the subcontractor has the responsibility of ensuring those workers under their employment and supervision follows governmental regulations and CRC safety policies. The preferable method of action is for the subcontractors to implement their own discipline policy. However, CRC reserves the right to immediately take the appropriate action to eliminate subcontractor safety and health exposures.

The CRC Superintendent will determine the course of action best suited to the circumstances. The subcontractor's Management will be informed of the violation and will enact the subcontractor discipline procedure as determined by the CRC Superintendent.

If the CRC Jobsite Superintendent determines that the disciplinary action taken by the subcontractor is not appropriate, he/she may elect to enact the CRC subcontractor discipline plan. The steps to be taken at a minimum shall include the following:

- **Step One - Verbal Warning –** As the first step in correcting unacceptable behavior, a representative of CRC will document the violation and notify the subcontractor that disciplinary action is required. The subcontractor's Leadership/Management shall review the pertinent facts with the subcontractor employee. A verbal warning will be issued to the subcontractor employee. This action will be documented along with the name of the subcontractor employee's direct supervisor. If necessary, the subcontractor employee will be placed on probation.
- **Step Two - Written Warning –** If the unacceptable behavior continues the next step will be a written warning. The written warning issued by CRC will clearly state the safety policy that was violated and steps the subcontractor employee must take if it is to be corrected. Probation will be a part of the written warning. It may also include time that the subcontractor employee will not be allowed on the jobsite as determined by the CRC Safety and Project Team. Each violation will be kept on file by the CRC Safety Manager for a period of six months.
- **Step Three – Removal From the Jobsite –** The subcontractor employee may be removed from the jobsite as determined by the CRC Superintendent if he/she does not improve his/her behavior while on probation, or has violated another company safety policy within twelve months.
  Note: *In cases where the safety violation could reasonably be expected to cause death or serious physical harm, CRC reserves the right to immediately remove the subcontractor employee without prior written warning.*

COMMUNICATION OF SAFETY AND HEALTH MATTERS

The elements of the CRC Subcontractor Handbook, Safety Requirements, and all aspects of its Safety and Health Program shall be communicated in a readily understandable manner to all subcontractor employees.

All subcontractor employees will participate in weekly toolbox safety meetings as well as special training on specific safety issues. Subcontractor employees shall be kept informed of the requirements of the CRC Subcontractor Safety Program through the use of weekly toolbox safety meetings, special training sessions, and day-to-day employee/supervisor interaction.

At the discretion of the CRC Superintendent, the subcontractor may hold a separate toolbox safety meeting. If a subcontractor chooses to hold a separate weekly toolbox safety meeting, a copy of the meeting minutes and attendance sheet must be provided to the CRC Superintendent. At least one or more subcontractor employees, at the CRC Superintendent's discretion, must attend the CRC weekly toolbox safety meeting so that information announced at that meeting could be relayed to subcontractor employees. Periodic job-wide safety meetings, attended by all subcontractor personnel, may be held at the discretion of the CRC Superintendent. At least one or more subcontractor employees must attend the CRC weekly toolbox safety meeting so that information announced at that meeting could be relayed to subcontractor employees.

It is the policy of CRC to encourage all subcontractor employees to report hazards existing at their jobsite to their supervisors so that corrective action can be taken in a timely manner. Subcontractor employees who report such conditions will not be disciplined nor will they suffer any reprisals due to their actions.

METHODS AND PROCEDURES FOR CORRECTING UNSAFE OR UNHEALTHY CONDITIONS OR WORK PRACTICES

All unsafe or unhealthy work conditions or work practices identified will be evaluated and corrected.

Unsafe or unhealthy work conditions or work practices will be corrected in a timely manner, as determined by the severity of the hazard. Under no conditions will subcontractor employees be required to, or permitted to, work under conditions that pose a clear or imminent hazard.

Problems that cannot be corrected immediately will be assigned to the Subcontractor's Leadership/Management and Designated Safety Representative to ensure completion of the corrective action. Once corrected, written documentation shall be furnished to the CRC Superintendent.

When an imminent hazard exists which cannot be immediately corrected without endangering employees and/or property, the following steps will be followed:

- Remove all potentially endangered workers from the dangerous work area.
- Provide employees responsible to correct the condition with necessary safeguards.
- Correct the problem.
- Document the corrective action and date corrected in accordance with this Section. The documentation is to be completed by the Subcontractor's Designated Safety Representative or her/his designee. The CRC Superintendent will be provided with a copy of this documentation.

Engineering controls will be used first to eliminate or minimize unsafe or unhealthy work conditions. If engineering controls are impractical or infeasible, administrative controls will be used. If engineering controls alone, or in combination with administrative controls cannot adequately minimize the hazard, personal protective equipment shall be used.

Unsafe work practices will be immediately corrected by providing the affected subcontractor employees with re-training to be provided by the Subcontractor's Designated Safety Representative or her/his designee.

TRAINING AND INSTRUCTION

Subcontractors shall ensure that their employees receive training and instruction in the following areas:

- General safety and health work practices.
- Specific instruction with respect to hazards unique to the job assignment.
- Individual operator training for Equipment and Tools in use and possess/can produce license/certification issued by their employer or agent as required by MIOSHA Standards.

SUBMITTAL OF RECORDS

The Subcontractor shall provide the following documentation upon request from the CRC Project Team:

- Safety training records.
- Job Hazard/Safety Analyses.
- Incident and injury reports.
- Disciplinary Actions.
- Safety inspection reports.
- Safety Data Sheet for materials on site.
- Other documentation as required by the CRC Superintendent.

ADDITIONAL SAFETY REQUIREMENTS

It is the goal of CRC to comply with the requirements and/or intent of federal and state rules and regulations and to provide a safe and healthful work environment for all workers on our jobsites. The CRC Superintendent and all subcontractors are required to maintain current regulation documents on the jobsite.

In addition to the requirement for complying with federal and state regulations, the following are requirements that all Subcontractors must provide and use, at a minimum, on CRC jobsites to protect themselves from potential hazards:

PPE – Personal Protective Equipment

- Hard Hats and Hi-Visibility Clothing
- Eye and Ear Protection – Safety/Sun Glasses ANSI Z87.1
- Work Shoes/Boots – Made of leather or substantial material, with adequate ankle/sole protection