Minimum Project Safety Requirements

Subcontractors are required to comply with our Safety Program, as well as all State and OSHA safety regulations. This requirement is identified in Subcontract/Purchase Order Attachment "B". Our Safety Program includes the safety requirements identified in the Subcontract/Purchase Order and the safety procedures, practices, and policies described in the Hoffman Safety Manual and/or the Hoffman Safety Handbook.

The following summarizes frequently asked questions concerning our Safety Program. This is not a complete listing of the Program.

Hoffman Safety Manual: The comprehensive Hoffman Safety Manual is available for review at all Hoffman offices and jobsites. The manual is continually updated.

Hoffman Safety Handbook: A copy of the Hoffman Safety Handbook is provided to all personnel during safety orientation. The handbook describes safety procedures, practices, and policies for many commonly encountered hazards.

Safety Orientation & Training: All new personnel to the Project must attend the Hoffman Safety Orientation before they start work at the project site. The safety orientation is scheduled by the Project Superintendent. The safety orientation includes site specific safety training. This does not relieve the Subcontractor of its responsibility for training its personnel.

Safety Meetings: All personnel must attend a weekly project wide safety meeting conducted by the Hoffman Project Superintendent.

Accidents & Injuries: All accidents or injuries, no matter how minor, are to be reported immediately to Hoffman's Project Superintendent or their designee. Serious "Near-Miss" incidents must also be reported to the Hoffman Project Superintendent in accordance with Hoffman's Level 3,2,1 Program. An Accident/Incident Report must be submitted before the end of the shift. Subcontractor's Foreman will conduct an Accident/Incident Investigation and prepare a report after the occurrence. The Subcontractor's General Foreman/Superintendent will be expected to discuss the causes and responses with Hoffman's Project Superintendent. Subcontractors are required to maintain adequate first aid equipment and supplies in their work areas, appropriate for their work.

Drug & Alcohol Testing: All personnel must comply with Hoffman's Drug and Alcohol Policy. Please make arrangements with your personnel to have their lab work complete before reporting to the job site. A listing of local testing laboratory locations is available at all Hoffman offices, jobsites and on line at www.Hoffmancorp.com/forms. Drug & Alcohol cards from Hoffman-recognized programs will be accepted if they have been issued within the past six months. The costs for laboratory analysis are paid for by Hoffman. The Subcontractor is responsible for the labor cost (time) required for the testing of its personnel.

Fall Prevention: All workers performing at elevations over 6 feet must have a 100% fall protection system. This includes but is not limited to: leading edge work; iron connecting; working off of elevated work platforms (scaffolding); and residential type construction. Only full body harnesses (ANSI A10.14 approved) may be used for fall protection. Hoffman will not accept "monitors" or "safety zones" as an acceptable means of fall protection.

Flagging: Subcontractors are responsible for the safe transportation of material and equipment on and off of the site. All Subcontractors will supply their own trained personnel to conduct flagging of traffic, if needed.

HOFFMAN CONSTRUCTION COMPANY Minimum Project Safety Requirements (continued)

Electrical: Most Hoffman projects are under the G.F.C.I. (Ground Fault Circuit Interruption) Program for electrical protection. Subcontractors are required to comply with this program. All electrical hot work must be pre-approved by the Hoffman Superintendent. Electrical hot work is defined as: "any work by hand, tool or implement that would infringe on the plain of the panel or box".

Lithium-Ion Battery Storage and Charging: All Lithium Ion power tool batteries, <u>regardless of</u> <u>manufacturer</u>, must be stored or charged outside office trailers, job shacks, or any wooden or other combustible structure under construction. Lithium Ion Power Tool Batteries stored in an outside location must not present a threat of fire to our project under construction, equipment, or temporary structures. Battery charging/storage inside of <u>non-combustible concrete or steel structures</u> may occur as long as the following three (3) criteria are met: 1. the structure is not enveloped and is open to outside air. 2. Batteries charged/stored must be in a metal gang box that is solely dedicated to power tool batteries and associated equipment only, and 3. The storage location <u>maintains a minimum 35 foot clearance</u> distance from combustible material of any type.

GHS/SDS/Hazardous Materials: Your specific attention to State and OSHA requirements on Globally Harmonized System (GHS) of Classification and Labeling of Chemicals, hazardous materials and hazard communications is required. When working with chemicals, additional safety planning/plans and/or site specific training may be required (e.g. brown fields, operating facilities, renovations, etc.). Copies of Safety Data Sheets (SDS) must be available on site and submitted to the Hoffman project office prior to delivery of these materials to the project. Storage and use of hazardous materials must comply with all applicable safety regulations.

Hot Work: Hot work typically requires completion of a Hot Work Permit then its approval by the Project Superintendent before work starts. The need for a fire-watch will be determined by the Hot Work Permit process and the Hoffman Project Superintendent. At a minimum, a fire-watch shall include: adequate type and number of portable fire extinguishers; extend at least 30 minutes past the end of the hot work; and provide tours at and below the level of hot work.

Ladders: Extension ladders must be secured from displacement at the bottom and secured at the top. No work on the top two steps of step ladders will be allowed.

Trailers and Dry Shacks: These areas are considered part of the Project and must be maintained in a safe manner. Safety concerns include: adequate hand-rails, protection over light bulbs, electrical covers, housekeeping, portable fire extinguishers, etc.

Waste Recycling: Hoffman may manage/coordinate a waste recycling program. Subcontractors must comply with its source separation program and will be responsible for their own housekeeping and delivery of their waste to the recycling dumpsters.

HOFFMAN CONSTRUCTION COMPANY Minimum Project Safety Requirements (continued)

Personal Protective Equipment (PPE): Subcontractor must provide all Personal Protective Equipment (PPE) when required for their work including, but not limited to:

- a) Fall protection, respirators, gloves, helmets, eye protection, foot protection, air and/or noise monitoring equipment.
- b) Work shoes are required on all projects. Specialty contractors must make specific arrangements with the Project Superintendent to determine adequate foot protection. At a minimum, work shoes must have ankle support and substantial sole protection exhibiting anti-slip properties.
- c) 100% eye protection is required to be worn by all employees while on the project. It must be ANSI Z 87.1 approved.
- d) All employees are required to wear gloves while on the project.

Pre-Work Stretching: Subcontractors are required to implement and manage an effective pre-work stretching program on the project. Typical pre-work stretching programs take each employee approx. 5-7 minutes to perform before starting their work day.

Equipment Spotters: Subcontractors shall develop and implement an effective program utilizing craft worker spotters to ensure that moving equipment does not cause personal injury, property damage or production inefficiencies. Moving equipment includes, but is not limited to, trucks, front-end loaders, forklifts, scissor lifts, extended boom lifts, single man lifts, articulated lifts and other mobile elevated work platforms. Incident reviews that identify ineffective procedures are being utilized shall mandate a corrective action plan from the Subcontractor.

Subcontractor Safety Plan: A Subcontractor Safety Plan must be completed by your company and submitted and reviewed by Hoffman prior to any Subcontract work commencing on site. This plan is site specific to address anticipated hazards and planned controls. Additional task-specific safety plans may be required, as determined by the Project Superintendent, depending upon hazard and work environment changes.

Subcontractor Safety Programs: All Subcontractor Safety Programs are subject to review by Hoffman for adequacy and completeness and must include at least the following:

- a) Notification of the person(s) responsible for safety by name and mobile phone number and/or pager number to Hoffman's Project Superintendent.
- b) Self-inspections of their work environment, including logs of vehicle and equipment inspections per manufacturer's and vendor's requirements (daily, monthly, etc.). Equipment on site that requires annual inspections must have such documentation on site at all times (e.g. crane annual inspection).
- c) Competent Person, as defined by OSHA, must be on site and identified for: trenching/excavation, scaffolding, confined space, crane, etc.

HOFFMAN CONSTRUCTION COMPANY Minimum Project Safety Requirements (continued)

Subcontractor Disciplinary Action Policy

Hoffman's Subcontractor Disciplinary Action Policy will be strictly enforced. The program is initiated when life threatening and/or repeat violations occur. The program is progressive in nature, ranging from written corrective warnings up to and including possible takeover of Subcontractor's work for default in accordance with Section XVIII of Attachment "C" for safety performance failures. The details are as follows:

- a) If Subcontractor's personnel receive a combination of written warning letters and/or personnel injuries, defined as "requiring off site medical care" and/or significant safety deficiencies that are deemed unacceptable by the project superintendent and corporate safety director, a meeting shall be held on site. As a minimum, the meeting shall include the following attendees: Subcontractor's Project Superintendent; Hoffman's Project Superintendent; Hoffman's Operations Manager; and Hoffman's Safety Director. The purpose of the meeting is to identify the corrective steps required and to agree upon the duration and implementation timelines necessary to reduce the possibility of any future hazards and/or injuries.
- b) If any additional written warning letters are issued, and/or personnel injuries occur, and/or significant safety deficiencies occur within the timelines agreed to above, a second meeting will be held with the above listed individuals as well as Hoffman's Vice President and the Subcontractor's responsible Principle. The purpose of this second meeting is to identify the additional corrective steps required and to agree upon the duration and implementation timelines necessary to reduce the possibility of any future hazards and/or injuries.
- c) If any additional written warning letters are issued and/or personnel injuries occur and/or significant safety deficiencies within the timelines agreed to in the second meeting above, Hoffman will immediately provide, at Subcontractor's expense, a Full Time Safety person to assist the Subcontractor and its personnel in proper implementation of safety rules and procedures.
- d) If subsequent Safety Violations occur, Hoffman will take over the Subcontractor's work, at Subcontractor's expense, for safety performance failures and default in accordance with Section XVIII of Subcontract Attachment "C".

We encourage you and your personnel to actively participate in the creation and maintenance of a safe and productive work place.