

EXHIBIT "C"



SUBCONTRACTOR SAFETY REQUIREMENTS

TABLE OF CONTENTS

<u>SP</u>	<u>Title</u>	<u>Page</u>
SSP-1	PURPOSE & SCOPE .....	2
SSP-2	BASIC HCC SAFETY EXPECTATIONS .....	2
SSP-3	SAFETY PROGRAM.....	2
SSP-4	SAFETY TRAINING.....	2
SSP-5	COMPETENT PERSON .....	2
SSP-6	SITE SAFETY INSPECTIONS & COOPERATIVE COMPLANCE.....	2
SSP-7	HAZARD IDENTIFICATION & CORRECTION.....	2
SSP-8	INCIDENT REPORTING & INVESTIGATIONS.....	2
SSP-9	TOOLBOX TALKS .....	2
SSP-10	HOUSEKEEPING 2	
SSP-11	RESTRICTED AREAS .....	2
SSP-12	SMOKING .....	3
SSP-13	PERSONAL PROTECTIVE EQUIPMENT (PPE).....	3
SSP-14	CONFINED SPACES.....	3
SSP-15	EMERGENCY PREPAREDNESS.....	3
SSP-16	HAZARD COMMUNICATION.....	3
SSP-17	GFCI'S .....	3
SSP-18	LOCKOUT / TAG OUT .....	3
SSP-19	LIVE ELECTRICAL WORK .....	4
SSP-20	HOT WORK .....	4
SSP-21	SANITATION.....	4
SSP-22	BRACING OF UNSUPPORTED MASONRY WALLS .....	4
SSP-23	TEMPORARY TRAFFIC CONTROL.....	4
SSP-24	MOTORIZED EQUIPMENT OPERATION.....	4
SSP-25	EXCAVATION WORK.....	4
SSP-26	LIABILITY EXPOSURES.....	4
SSP-27	SUBSTANCE ABUSE POLICY.....	4
SSP-28	HORSEPLAY, FIGHTING, THREATS OF VIOLENCE AND/OR POSSESSION OF WEAPONS.....	5
SSP-29	LOOSE CLOTHING, JEWELRY AND LONG HAIR.....	5
SSP-30	COMPANY & PERSONAL VEHICLES .....	5
SSP-31	POLICY VIOLATORS.....	5
SSP-32	SUBCONTRACTOR SAFETY PERFORMANCE & HISTORY DATA .....	5

## **SSP-1 PURPOSE & SCOPE**

**Worker safety** – The primary goal of this policy is to assure a safe and healthy workplace on Holland Construction Corporation (HCC) jobsites by establishing basic safety parameters that HCC subcontractors must meet.

**Regulatory compliance** – This policy is part of HCC 's on-going effort to manage and coordinate jobsite safety with its subcontractors in accordance with the requirements of 29 CFR 1926.16(c) & (d) and OSHA's Multi-Employer Worksite Citation Policy.

**Scope** - The provisions of this policy apply to all HCC subcontractors (regardless of subcontractor tier) and their suppliers/vendors, regardless of whether or not HCC personnel are onsite. This policy shall continue to remain in effect until or unless modified in writing by HCC.

**Policy Limitations** - In no way is this program meant to alter, replace or supersede OSHA (& MOSH in Maryland) regulations.

## **SSP-2 BASIC HCC SAFETY EXPECTATIONS**

In an effort to manage risk potential and to run safe, efficient projects, HCC has instituted this policy to hold each subcontractor accountable for:

- Safety performance on the job.
- Conducting work with due regard to and in compliance with occupational safety and health requirements established by OSHA (& MOSH in Maryland), consensus industry standards and the provisions of this policy.

Subcontractors and their employees shall abide by all appropriate OSHA construction regulations as published in the most current edition of 29 CFR 1926 (and in Maryland, applicable MOSH & COMAR regulations). During any service or maintenance-related work, subcontractors shall be responsible for complying with pertinent general industry regulations as published in the most current edition of 29 CFR 1910 (and in Maryland, applicable MOSH & COMAR regulations). It is expected that subcontractors & primes also comply with applicable Federal & State environmental & transportation laws.

- Communicating and ensuring an understanding of the basic provisions of this policy with all subcontractor employees who will be onsite.
- Providing safety performance & history data to HCC (last page).
- Subcontractors shall adhere to the ALL HCC safety rules and expectations, **in addition to what OSHA/MOSH requires**. In no way do these additional provisions relieve the subcontractor of its duties under the OSHA act or OSHA/MOSH regulations.

## **SSP-3 SAFETY PROGRAM**

Subcontractor shall **have and maintain on site a copy of its written safety & health program**. The program shall include specific methods that the subcontractor will use to identify and correct workplace hazards. The document shall remain accessible to HCC until completion of all site work.

## **SSP-4 SAFETY TRAINING**

It is expected that each subcontractor meets all of its OSHA-required training obligations (& those required by MOSH, if in Maryland). This shall include instructing employees in the recognition and avoidance of unsafe acts & conditions, the proper use of the tools and equipment that they will be using and the OSHA (& MOSH/COMAR in Maryland) regulations pertaining to site activities to which they will be exposed. HCC reserves the right to obtain copies of subcontractor safety training documentation as proof that specialized training has occurred for specific employees.

## **SSP-5 COMPETENT PERSON**

Subcontractors shall assign at least one competent person to the job. It is expected that this person has completed a 10-hour OSHA Construction Safety & Health Outreach course or equivalent. The competent person(s) shall be identified and made known to the HCC superintendent in writing (initially and if changed). If HCC is not satisfied with the safety performance or knowledge of the assigned competent person, the subcontractor shall be responsible for assigning another individual to fulfill this vital role on the jobsite.

## **SSP-6 SITE SAFETY INSPECTIONS & COOPERATIVE COMPLIANCE**

The competent person shall be responsible for walking areas of the site where the subcontractor is or will be working that day for the sole purpose of hazard identification and correction. In addition, the competent person shall continually evaluate the work areas throughout the day and correct safety/health hazards as they are found.

HCC conducts site safety inspections and also occasionally partners with MOSH through their voluntary compliance/consultation service. Subcontractors are expected to participate in both of these initiatives and correct identified hazards immediately.

## **SSP-7 HAZARD IDENTIFICATION & CORRECTION**

All subcontractor employees are expected to continually evaluate their work areas for safety & health hazards and either correct the hazards or seek corrective action through their foreman (or the foreman through HCC site superintendent). It is expected that the competent person will promote and insist upon hazard ID & correction as a part of each employee's job.

If a subcontractor creates a hazard, it is responsible for fixing it regardless of whether or not its employees are exposed to the hazard. If this is not happening, the subcontractor may be back-charged for the time and materials necessary for HCC to correct the hazard. If the subcontractor is exposed to a hazard that they did not create and/or are not responsible for, please immediately report this to the HCC site superintendent so that prompt action can be initiated.

## **SSP-8 INCIDENT REPORTING & INVESTIGATIONS**

**All incidents (near misses & occurrences involving personal injury or property damage) shall be immediately reported to HCC and investigated by the subcontractor.** It is expected that the root causes of incidents be determined and that actions be taken to prevent future similar incidents. HCC reserves the right to request copies of subcontractor incident reports, investigation findings and/or to conduct further investigation and analysis as warranted.

## **SSP-9 TOOLBOX TALKS**

Subcontractors shall implement a weekly schedule of toolbox talk safety meetings. **Each week the subcontractor shall submit completed (signed) copies of the toolbox talks to HCC.**

#### **SSP-10 HOUSEKEEPING**

Subcontractors shall enforce good housekeeping practices to minimize potential for injury, fire or other accidents. Special care must be taken to not mix potential ignition sources (especially cigarette butts) in with combustible or flammable materials.

#### **SSP-11 RESTRICTED AREAS**

Unauthorized persons must keep clear of restricted areas, such as barricaded/taped-off areas, controlled access zones, limited access zones, confined spaces and excavations/trenches.

#### **SSP-12 SMOKING**

MD sites – Smoking is not permitted in any building or building under construction once the roof structure is in place and is either decked or sheathed. Smoking shall be permitted outside, at least 50' away from areas where flammable or combustible substances are stored, handled or used.

PA sites – No smoking is permitted within 50' of areas where flammable substances are stored, handled or used or in areas where easily ignitable combustible material or debris is present in sufficient quantity to produce a risk of fire. Any other restrictions on smoking shall be determined on a site-by-site basis.

#### **SSP-13 PERSONAL PROTECTIVE EQUIPMENT (PPE)**

All subcontractors shall be responsible for providing PPE to their employees and for assuring its use in accordance with the following policy (at a minimum):

Eye & face protection – Safety glasses (ANSI Z87.1) must be worn on the job at all times to protect the eyes from physical, chemical and radiological hazards (OSHA requirement). Prescription glasses and sunglasses must have side shields and meet ANSI Z87.1 specifications to be considered safety glasses. Refer to OSHA standard 1926.102 for other eye/face protection requirements (chemical splash, welding, use of torches, lasers, etc.).

Hardhats – Required to be worn on all jobs at all times. Hardhats must meet ANSI Z89.1 specifications and be of the class appropriate for worker exposures (class G = low voltage protection up to 2,200 volts; class E = High voltage protection up to 20,000 volts; class C = not rated for electrical exposures). Bump caps are not permitted. Long hair (longer than shoulder length) must be secured under the hardhat.

Footwear – Laced & tied leather work boots must be worn on the job at all times – no sneakers. Where foot impact, crush or compression hazards exist, footwear must be either safety-toed or protected by metatarsal guards.

Clothing – Long pants & sleeved shirts (short or long) must be worn on the job at all times. No shorts, sweatpants, tank tops and no working without a shirt.

Special protective clothing – Where exposed to sparks, flame or molten metal (grinding, welding, torches, etc.), clothing must be flame resistant. Where the potential for arc flash exposure exists, clothing and PPE must be chosen and worn based upon the clothing/PPE matrix in the most current version of National Fire Protection Association (NFPA) 70E, Standard for Electrical Safety in the Workplace.

High visibility traffic vests – Required whenever working within 15' of a traveled public road or parking lot, unless behind a guide rail or 2' or more behind a curb. At a minimum, vests must meet ANSI Z107 – Class 2 spec's (Class 3 required for nighttime work or on roads with traffic speeds over 50 mph).

Respirators – Refer to OSHA requirements (29 CFR 1910.134).

Hearing protection – Ear plugs or equivalent hearing protection must be worn anytime when jack hammering or using loud tools (requiring the worker to shout to be heard & understood at arm's length). Refer to OSHA requirements (29 CFR 1926.101).

Protective gloves – Prior to offering first aid, protective gloves (latex, nitrile or vinyl) must be worn to protect against exposure to blood or bodily fluids. For all other exposures, refer to OSHA requirements (29 CFR 1926.95) and recommendations from chemical MSDS.

#### **SSP-14 CONFINED SPACES**

Prior to entry into any confined space (manholes, vaults, pits, etc.), the subcontractor competent person shall meet with HCC's superintendent to determine whether or not a permit is required for entry and to review

procedures, training and equipment that will be used. No entries into permit-required confined spaces shall be allowed without issuance of a permit.

Permit spaces are confined spaces where there exists, or a potential exists, for: 1) a hazardous atmosphere (oxygen deficiency, flammable gases/vapors &/or toxic gases/vapors), 2) entrant entrapment due to internal configuration of space, 3) entrant engulfment from flowable material, and/or 4) any other safety or health hazard that presents the risk of serious injury or death to anyone involved in the confined space entry operations.

HCC's superintendent has the right to prevent entry if not satisfied with subcontractor entry procedures, training or equipment. Subcontractors who enter confined spaces shall conduct pre- and post-entry briefings with HCC's superintendent in accordance with OSHA's Permit Required Confined Space requirements under 29 CFR 1910.146(c)(8). Permits shall be posted at/near confined space entrance during the entry operations and, upon completion of entry work, a copy of the expired permit and any other supporting documentation shall be provided to HCC.

#### **SSP-15 EMERGENCY PREPAREDNESS**

1st aid/CPR – Subcontractor shall be responsible for having at least one employee on site with current certification in 1st aid/CPR.

Medical supplies – Subcontractor shall maintain a stocked 1st aid kit on site, complete with eye wash and supplies to prevent transmission of bloodborne diseases.

Biohazard exposures – Subcontractor shall inform employees of the tasks or work areas that may present exposure to biohazard materials (bloodborne

pathogens). These employees shall then be trained on the availability and use of supplies, PPE and procedures necessary to minimize risk of exposure.

**Evacuation** – As part of the site Emergency Action Plan, subcontractor shall meet with the HCC superintendent at the start of the project to review:

- a) Site evacuation signal
- b) Location of the post-evacuation congregation area
- c) Procedures for taking and reporting head counts
- d) Location of nearest medical facilities, and
- e) Location where cell phone signal is adequate for emergency calls.

#### **SSP-16 HAZARD COMMUNICATION**

**Subcontractor shall submit to HCC a copy of its written hazard communication program and MSDS BEFORE start of work.** This information will remain with HCC's Superintendent and will be readily available and accessible to all employers and employees on site at all times until the subcontractor's work is entirely complete.

Prior to the start of site work, the subcontractor competent person shall meet with HCC's superintendent to briefly share information on any special chemical labeling systems, hazardous substances to be brought onto site, hazardous substances that will be created (ex: lead dust, asbestos, silica dust, etc.) precautions to be taken with the hazardous substances and MSDS location.

#### **SSP-17 GFCI'S**

Expected to be used as specified by OSHA and tested daily.

#### **SSP-18 LOCKOUT/TAG OUT**

Subcontractor shall implement a lockout/tagout system to deenergize, isolate and secure hazardous energy sources before any worker could be exposed to danger from the inadvertent energization or start-up of machinery, equipment, circuits or systems.

#### **SSP-19 LIVE ELECTRICAL WORK**

Live parts must be locked & tagged out before any employee works on or near them unless: 1) lockout/tagout creates hazards or increased risks, 2) lockout/tagout is infeasible due to equipment design or operational limitations, or 3) system is < 50V and no increased exposure to burn or arc explosion.

Prior to the start of any live work on energized parts over 50V, the subcontractor employee must:

- Be trained and qualified for live work per the most current version of National Fire Protection Association (NFPA) 70E, Standard for Electrical Safety in the Workplace.
- Conduct a shock hazard analysis and flash hazard analysis per NFPA 70E.
- Institute safety-related work practices and precautions that will provide effective protection against arc flash and contact with live parts per NFPA 70E. These practices shall include the marking of the limited approach boundary – the point beyond which only authorized (qualified) personnel are permitted.
- Institute an energized electrical work permit program.

- Keep unqualified persons out of work area.

#### **SSP-20 HOT WORK**

Prior to performing hot work (welding, cutting, burning, grinding or any other spark/flame-producing activity) within 35' of flammable or combustible materials or construction, the subcontractor must be issued a hot work permit and institute a fire watch (requires trained personnel). The subcontractor shall conduct a pre-hot work briefing with the HCC's superintendent to:

- Be issued and review the hot work permit
- Explain necessary safety precautions that will need to be taken, and
- Identify the safety equipment that will need to be provided.

Upon completion of the permitted hot work and fire watch, a copy of the expired permit shall be provided to HCC.

#### **SSP-21 SANITATION**

Unless agreed upon otherwise before the start of site work, subcontractors shall be responsible for providing their own toilets, trash receptacles, washing facilities and potable water for employees.

#### **SSP-22 BRACING OF UNSUPPORTED MASONRY WALLS**

Until supported by structure, subcontractors constructing unsupported masonry or concrete walls must brace those walls &/or establish a limited access zone per OSHA standard 29 CFR 1926.706. Subcontractors may be relieved of this duty if this responsibility is assigned to another contractor in the work contract.

#### **SSP-23 TEMPORARY TRAFFIC CONTROL**

Subcontractor shall provide temporary traffic control anytime work must take place within 15' of a publicly traveled roadway/parking lot, unless behind a guide rail or 2' or more behind a curb. All temporary traffic control shall be in substantial compliance with the most recent edition of the Manual on Uniform Traffic Control Devices (MUTCD) – Part 6 and applicable state requirements.

Vehicles within 15' of a traveled public roadway shall be equipped with operating strobe lights. All employees in a temporary traffic control area must be wearing a high-visibility vest as required by the PPE provisions of this policy. Flaggers must be trained in accordance with the requirements specified in the MUTCD and applicable state law.

#### **SSP-24 MOTORIZED EQUIPMENT OPERATION**

Subcontractors are responsible for the safe operation and proper maintenance of their equipment. HCC expects:

**Authorized operators** – Only employer-authorized personnel are permitted to operate powered equipment / vehicles and that these individuals must have had formal safety training regarding safe equipment operation.

**Forklifts** – Where forklifts (straight mast or extensible boom) will be used, the subcontractor shall maintain on-site proof of current forklift operator training (meeting OSHA 29 CFR 1910.178(l) requirements).

**Crane operators** – Crane operators must hold current operator safety certification.

Inspections – Regular (at least daily) safety inspections must be conducted for all motorized equipment. These safety checks must focus on operability of safety devices – including horns and back-up/bi-directional alarms, equipment maintenance and safe operation. Cranes must display a current inspection sticker and the operator must maintain on site the unit's inspection logs.

Warning devices – Horns and back-up/bi-directional alarms function properly.

Seatbelts – Must be worn on any equipment with a rollover protective structure (ROPS).

Swing radius – To prevent struck-by and crush injuries, the swing radius of crane superstructures shall be barricaded to prevent unauthorized entry. As necessary to protect workers in tight areas, this provision also applies to other equipment that poses this hazard, such as track hoes and forklifts.

Fire extinguishers – Required for all heavy equipment.

HCC equipment is not available for subcontractor use, unless prior arrangements have been made.

#### **SSP-25 EXCAVATION WORK**

Where subcontractor work requires entry into an excavation or trench, the subcontractor shall have a person on site that is competent in the area of excavation & trenching safety. Under no circumstances are subcontractor employees to leave the protective confines of a cave-in protective system. Where subcontractors or primes conduct excavation or trenching work, each shall make their own call to the state's underground locating service (PA – PA One Call, MD – Miss Utility) and shall obtain its own serial number for the work, regardless of whether or not HCC is on site or where HCC may be working.

#### **SSP-26 LIABILITY EXPOSURES**

Throughout the course of contracted work, subcontractor shall take due care to secure equipment, materials, tools, chemicals and access to dangerous areas (whether on site or not). Special consideration must be given to site-specific public liability exposures (student/public access, children, crime/vandalism, etc.). Subcontractor shall be responsible for taking whatever actions are necessary to prevent harm to public.

#### **SSP-27 SUBSTANCE ABUSE POLICY**

Any subcontractor employee under the influence of or who manufactures, possesses, distributes, offers to sell/trade or uses illegal drugs or alcohol on the job will be removed from the job and will not be permitted to return. All individuals must submit to post accident & reasonable suspicion drug & alcohol testing. Any individual refusing a test under these provisions will be considered in violation of our policy and will not be permitted to return to the worksite.

- a. Post-accident – All individuals involved in an on-the-job accident must submit to post-accident drug & alcohol testing.
- "Involved in" – Means having any direct involvement in the accident, regardless of who was at fault or who caused the accident.
  - "On the job" – Means on HCC premises or worksites, whenever representing HCC and/or whenever operating company vehicles or equipment.

- "Accident" – Means any injury which requires professional medical treatment or which involves damage to another party's property.
- b. Reasonable suspicion – All individuals reasonably suspected of violating the HCC Substance Abuse Policy must submit to drug & alcohol testing. Reasons that may substantiate reasonable suspicion testing may include, but are not limited to:
- Detection of evidence that suggests an individual may be using or in the possession of illegal drugs or alcohol while on the job.
  - Observation of behavior or detection of characteristics that may suggest an individual is under the influence of illegal drugs or alcohol.
  - Observation of a pattern of abnormal conduct or erratic behavior.
  - Observation of deteriorating and/or unsafe work practices that pose a danger (capable of producing death or serious injury/illness) to persons or a risk of business disruption to the overall operation of HCC. This may include any type of accident and/or near-miss incident, regardless of whether or not there was injury or damage.
  - Arrest or conviction for a drug-related offense or the identification of an individual as the focus of a criminal investigation into illegal drug possession, use or trafficking.
  - Receipt of information provided by reliable and credible sources.
  - Receipt of evidence that an individual has tampered with a previous drug or alcohol test.

The subcontractor site foreman or company representative will be immediately notified of the need for testing and reason. The subcontractor foreman or company representative shall promptly and discretely take the affected employee(s) to the nearest state-licensed collection/testing facility. Transportation between the worksite and the collection/testing facility shall be arranged such that the individual(s) being tested is/are not driving a vehicle. Vendors, suppliers &/or subcontractors shall bear all costs associated with the testing of their employees.

#### **SSP-28 HORSEPLAY, FIGHTING, THREATS OF VIOLENCE &/OR POSSESSION OF WEAPONS**

Strictly prohibited in the workplace. Violators will be permanently removed from the jobsite. In the case of threats of violence or possession of weapon, local law enforcement authorities will be contacted.

#### **SSP-29 LOOSE CLOTHING, JEWELRY & LONG HAIR**

Do not wear loose clothing or exposed jewelry onto the job. There are many catch & electrical hazards inherent to this line of work and they are capable of producing serious injury. For the same reason, long hair (longer than shoulder length) must be secured under the hardhat.

#### **SSP-30 COMPANY & PERSONAL VEHICLES**

All employees who operate company vehicles must hold a valid drivers license of proper classification and operate the vehicles in accordance with state laws and regulations. Never park any vehicle – company or personal – in areas where it could be exposed to damage, block exits, hydrants or emergency responder access or block motorist view of a work area.

**SSP-31 POLICY VIOLATORS**

Failure to adhere to the responsibilities described in this policy shall subject serious, repeat or willful violators to disciplinary action. This may include HCC-imposed fines of up to \$1,000 per offense, removal from jobsite and/or termination of the work contract.

**SSP-32 SUBCONTRACTOR SAFETY PERFORMANCE & HISTORY DATA**

Please accurately complete the requested information on the Subcontractor Safety Prequalification form and promptly return to HCC. Failure to do so may result in lack of consideration for present and/or future work.



**Subcontractor Safety Prequalification**

Name of subcontractor: \_\_\_\_\_

Contact name: \_\_\_\_\_ Phone: \_\_\_\_\_

**INJURY, ILLNESS & OSHA DATA**

Please provide the following information for the current & three (3) most recent years.

Measure	Current	20__	20__	20__
Ave. number of employees for year*				

# fatalities				
Total # of OSHA recordables (#300 log)				
# recordables with lost or restricted time				
Experience Modification Factor				

# OSHA** inspections				
Total # OSHA citations				
# "Serious" citations				
# "Repeat" or "Willful" citations				

\* Used to calculate OSHA Incidence Rate & DART Rate.

\*\*Includes Federal or State OSHA inspections, citations & fines (ex: MOSH, VOSH, etc.)

Failure to abide by the terms of this policy, OSHA regulations (Federal or State) and other industry-accepted safety practices can result in disciplinary action, up to and including expulsion from the jobsite. **We sincerely appreciate the extra efforts put forth and hope you agree with our view on safety as an investment in the future of our businesses and industry.**