



EHS SAFETY SPECIFICATIONS: CONTINGENT LABOR AND SUBCONTRACTORS

TABLE OF CONTENTS

- I. GENERAL
- II. STOP WORK POLICY
- III. SAFETY TRAINING
- IV. PERSONAL PROTECTIVE EQUIPMENT/SAFETY EQUIPMENT
- V. SAFETY INSPECTIONS
- VI. SUBSTANCE ABUSE
- VII. SMOKING AND TOBACCO PRODUCTS
- VIII. ACCIDENT/INJURY REPORTING
- IX. CRISIS MANAGEMENT PLAN
- X. EMERGENCY RESPONSE/FIRST AID
- XI. RETURN TO WORK
- XII. DISCIPLINARY PROCEDURE
- XIII. JOB HAZARD ANALYSIS (JHA) / RISK ASSESSMENT (RA)
- XIV. PERMITS
- XV. COMPETENT PERSON
- XVI. WORKING AT HEIGHTS
- XVII. LADDERS
- XVIII. EXCAVATION/TRENCHING/SHORING/SLOPING/SHEILDING
- XIX. ENERGY CONTROL (LOCK-OUT / TAG-OUT)
- XX. CRANES
- XXI. HELICOPTER "EXTERNAL LIFT"
- XXII. HOUSEKEEPING
- XXIII. POWERED INDUSTRIAL VEHICLES / FORKLIFTS
- XXIV. CONFINED SPACE
- XXV. HAZARD COMMUNICATION
- XXVI. JOB SITE ACCESS
- XXVII. ENVIRONMENTAL AND WASTE MANAGEMENT COMPLIANCE
- XXVIII. ADDITIONAL REQUIREMENTS/CONSIDERATIONS

I. GENERAL

- A. All Subcontractor personnel (including the personnel of all subcontractors working through subcontractor; hereinafter, individually and collectively a "Subcontractor") shall comply with all (i) applicable occupational safety and health laws, rules, and regulations; and (ii) worksite safety rules and those rules promulgated by the Company's customer.
- B. Upon request by the Company, Subcontractors shall provide environmental, health and safety performance documentation for review.
- C. Subcontractors will prepare a site-specific written safety plan that applies to the specific work they are performing at the site.
- D. When subcontracting is permitted by the Company, all Subcontractors who hire lower-tier subcontractors or other third parties to perform work at the site shall ensure that all such persons comply with the provisions of these Subcontractor Safety Specifications.
- E. Subcontractors shall implement effective controls to reduce the risk of an injury or illness occurring and any Subcontractor who creates a hazard shall eliminate the hazard before any further work may proceed.
- F. Any Subcontractor that creates a hazard shall implement effective controls to reduce the risk of an injury or illness occurring before work activities may proceed.
- G. If the subcontractor identifies uncontrolled hazards, either effective controls should be immediately implemented by the Subcontractor to reduce the risk of injury or illness, or a Stop Work should be issued and the subcontractor should immediately report the uncontrolled hazard to the Company.
- H. Subcontractors shall participate in all required pre-job safety meetings.

II. STOP WORK POLICY

Whenever an imminent danger is present to any person, including but not limited to, Company personnel, Subcontractor personnel, and third parties, the Subcontractor shall "stop work" until the imminent danger is abated. As used herein, an imminent danger includes is "any condition or practice that could reasonably be expected to cause substantial harm to the health and safety of others or to the environment." Examples of imminent danger include, but are not limited to:

A situation for which:

- A person completing a task (a "Worker") is not properly trained or experienced.
- The Worker is not equipped (i.e., lacks safety or personal protective equipment).
- The Worker encounters a hazard that cannot be controlled to reduce the risk of serious injury or illness from occurring and would be considered immediately dangerous to life and health.
- A worker is unfit for work due to illness, the influence of alcohol, or illegal or mind-altering substances.
- A danger that would normally stop work in the affected area.

Subcontractor's personnel are required to report all "stop work" actions immediately to their supervisor for investigation. During the investigation, the person(s) issuing the stop work should not leave the site or return to the work activity without their supervisor's authorization.

If the "stop work" action is used for legitimate safety reasons, the individual initiating the action is protected from discipline, retribution, or retaliation by the Company.

Contractor has authority to order stop work on the site whenever an imminent danger is present. While such provision might indicate a higher level of control by the Contractor and could have OSHA multi-employer citation policy implications, it sets forth clear safety expectations and can be very important in addressing dangerous situations.

III. SAFETY TRAINING

- A. Safety Orientation Training
 1. Subcontractors shall conduct relevant safety training and attend all site-specific training before performing any work on the job site, including conducting all training that is required by applicable occupational safety and health laws, rules, and regulations and all training required by and necessary to understand all relevant Company and customer site requirements. Subcontractors shall ensure that a list of subcontractor workers that successfully completed all required training is maintained.
 2. Subcontractor shall at their own expense require its subcontractors, agents and personnel to comply with all applicable safety requirements. When required by the Company or its customer, prior to commencement of any work under this Agreement, Subcontractor's subcontractors, agents, and personnel will complete a basic construction training safety course, or its equivalent, that is related to the work that the Subcontractor will perform under this Agreement. Subcontractor will provide JC with certification that such training has been completed.

B. Weekly Toolbox Talks

When required by law, the Prime Contract, or by the Contractor, Subcontractors shall conduct weekly safety toolbox talks and shall provide documentation evidencing compliance upon request.

C. Job Hazard Analysis / Risk Assessment

Subcontractors shall review and train their affected personnel on the job hazard analysis / risk assessment that pertains to the job tasks such persons will perform. When required by law, the Prime Contract, or by the Contractor, Subcontractors shall provide documentation evidencing compliance upon request.

IV. PERSONAL PROTECTIVE EQUIPMENT/SAFETY EQUIPMENT

A. Personal Protective Equipment

1. Subcontractors shall supply their personnel with the appropriate personal protective equipment that meets the safety requirements required by law, outlined by federal, state/provincial and local safety laws, rules and regulations.
2. The following minimum levels of personal protective equipment are mandatory on all JC construction sites without exception:
 - a. Hard hats
 - b. Eye protection with side shields
 - c. Hard-soled work boots with leather uppers
3. Shorts, tennis shoes and tank tops are prohibited on all JC construction sites.

B. Safety Equipment

Subcontractors shall supply their personnel with the appropriate safety equipment that will meet the safety requirements under (i) applicable occupational safety and health laws, rules, and regulations; and (ii) worksite safety rules and those rules promulgated by the Company's customer.

V. SAFETY INSPECTIONS

When required by law, the Prime Contract, or by the Contractor, Subcontractors shall perform safety inspections of specific job tasks for which Subcontractor is responsible for at the site. When required by law, the Prime Contract, or by the Contractor, Subcontractors shall provide documentation evidencing compliance upon request.

VI. SUBSTANCE ABUSE

Any Subcontractor personnel possessing, suspected of using or being under the influence of alcohol or an illegal or mind-altering substance while on the site shall be (1) immediately removed from the worksite for evaluation, and (2) if suspicions are confirmed, permanently removal from the project / worksite.

To the extent permitted by local law, if Subcontractor personnel demonstrate impaired behavior, the individual in question will be asked to submit to evaluation which may include a Breathalyzer or other test(s) at an occupational clinic. Any person found to be legally impaired will be immediately and permanently removed from the project/worksite. Refusal to submit to evaluation will result in the immediate and permanent removal of the person from the project/worksite.

VII. SMOKING AND TOBACCO PRODUCTS

Subcontractor shall comply with all worksite rules and laws, governing the use of smoking and smokeless tobacco products on the worksite.

VIII. ACCIDENT/INJURY REPORTING

- A.** Subcontractor shall coordinate with the Contractor to ensure compliance with any applicable reporting requirements to regulatory agencies. Further, Subcontractors shall report all workplace accidents, injuries, or illnesses, regardless of severity, to the Company project manager/contact person.
1. Fatalities or incidents involving significant, severe, or life-threatening injuries or illnesses must be reported within one (1) hour
 2. Other injuries, illnesses, or property damage events must be reported the same day

IX. CRISIS MANAGEMENT PLAN

If a regulatory environmental, health or safety agency is on-site, a representative of the Company should be notified as soon as possible. Subcontractor personnel shall not discuss, talk, or communicate with the media regarding any issues concerning the project/worksite. The Company Crisis Management Team will be contacted immediately, and they will appoint a Company spokesperson to communicate with the media.

X. EMERGENCY RESPONSE/FIRST AID

- A. Subcontractor shall provide a first aid kit on worksite with adequate supplies to respond to anticipated injuries or illnesses.
- B. The Company will monitor and track all injuries and illnesses that occur on the worksite. This does not relieve Subcontractors of their record keeping requirements.
- C. Subcontractors are responsible for investigating all incidents occurring to their staff and their subcontractors and sharing the findings of such investigation with the Company. Subcontractor shall participate in additional Company incident investigation measures when requested to do so by the Company.

XI. RETURN TO WORK

For injuries or illnesses requiring medical treatment beyond first aid, any injured Subcontractor personnel shall only return to the worksite when authorized by the medical professional managing their case. If the injury is of the type that permits the person to return to work with restrictions, the Subcontractor will provide the person with work in accordance with the doctor's recommendations.

XII. DISCIPLINARY PROCEDURE

- A. Failure to abide by all (i) applicable occupational safety and health laws, rules, and regulations; and (ii) worksite safety rules and those rules promulgated by the Company's customer may place fellow workers and others at risk. Subcontractor shall develop appropriate disciplinary action plan to address any violations of the foregoing..

The Subcontractor should utilize a disciplinary process for violation of safety requirements taking into account various factors, including but not limited to the severity of the safety violation.

- B. Zero Tolerance

Consideration will be given to work practices that may cause immediate danger to the life and health (IDLH) of any person present at the worksite. The disregard of safety in these situations will immediately result in immediate and permanent dismissal from the worksite. Violations considered IDLH include, but are not limited to, violations of the following programs:

- Energy Control (Lock-Out / Tag-Out)
- Work at Height
- Electrical Safety
- Confined Space
- Ladders
- Excavation / Trenching / Shoring
- Cranes / Hoists / Slings

XIII. JOB HAZARD ANALYSIS (JHA) / RISK ASSESSMENT (RA)

Subcontractors shall complete a documented JHA / RA prior to starting any type of work at the site, and will provide evidence of compliance upon request.

XIV. PERMITS

- A. Subcontractor shall comply with all site hazardous work permit processes, including - but not restricted to - Hot Work Permit, Confined Space Entry permit, Work at Height Permit, Lock-Out / Tag-Out Permit, Live Electrical Work Permit.
- B. In case the site does not operate a site-wide hazardous work permit process, subcontractors shall use their own permit process to ensure workplace safety. At a minimum, the permit process must meet the (i) applicable occupational safety and health laws, rules, and regulations; and (ii) worksite safety rules and those rules promulgated by the site.

XV. COMPETENT PERSON

Subcontractor ensures adequate competent persons are on-site to execute work. A competent person shall mean a person who is capable of identifying existing and foreseeable hazards in the surrounding work area or working conditions which are unsanitary, hazardous or dangerous, and who has authorization to take prompt, corrective measures to eliminate the hazardous or dangerous conditions. A competent person is also a person who has extensive knowledge and experience in a particular activity or job function, as well as knowledge of (i) applicable occupational safety and health laws, rules, and regulations; and (ii) worksite safety rules and those rules promulgated by the Company's customer.

Subcontractors shall designate a competent safety person for the following tasks:

- Scaffolding
- Excavation/Trenching/Shoring

- Fall Protection
- Steel Erection/Assembly
- Concrete & Masonry Construction
- Crane/Hoisting/Rigging
- Blasting

XVI. WORK AT HEIGHT

A. Fall Protection

When fall protection devices like guardrails, nets, etc., cannot be provided and the Subcontractor is exposed to a fall greater than four feet / 1.22 meters, Subcontractor personnel shall use a personal fall arrest system. A personal fall arrest system consists of full body harness and shock absorbing lanyard.

B. Scaffolding

1. All scaffolding used on site that has a working surface higher than six feet must have guardrails. Each guardrail will consist of a top rail midrail and toe board.
2. Subcontractors shall use a personal fall arrest system when they are working on scaffolding that has a working surface higher than four feet / 1.22 meters but does not have a proper guardrail or complete deck.
3. Subcontractors shall comply with all legal and manufacturers' recommended maintenance and safety requirements.

C. Aerial Lifts/Scissors Lifts

1. Subcontractors shall comply with all manufacturers' recommended maintenance and safety requirements.
2. Subcontractors shall use fall limiting devices when the aerial lift device is equipped to accept the use of fall limiting devices during their work in an aerial lift and scissors lift.

XVII. LADDERS

All ladders shall comply with all (i) applicable occupational safety and health laws, rules, and regulations; and (ii) worksite safety rules and those rules promulgated by the Company's customer.

1. Subcontractors shall comply with all legal and manufacturer's recommended maintenance and safety requirements.
2. All ladders must be inspected prior to each day's use and maintained in good operating condition. Ladders - including but not limited to platform, cross-step platform, cross-step stepladder, stepladder, extension or fixed, observed to have structural defects must be tagged "DO NOT USE" and immediately removed from service.
3. Stepladders used by employees must be of non-conductive fiberglass (not wood or aluminum) with a minimum duty rating of Type 1A with a load capacity of at least 300 pounds.
4. All extension ladders shall be tied off and secured with an EPDM rubber strap or ratchet strap, or a second person must hold and secure the ladder at the bottom.
5. When climbing a ladder, Subcontractor employees must face the ladder and use both hands when ascending or descending, maintaining 3-point contact at all times.

XVIII. EXCAVATION/TRENCHING/SHORING/SLOPING/SHEILDING

Subcontractors shall comply with all legal and contractual requirements.

XIX. ENERGY CONTROL (LOCK-OUT/TAG-OUT)

- A. Any time a Subcontractor employee is servicing or maintaining a machine or piece of equipment (point of operation) where an unexpected start-up or release of stored energy (electrical, mechanical, hydraulic, pneumatic, chemical, gravity, etc.) could cause injury, all equipment and systems must be de-energized using proper lockout/tagout procedures before that work is performed, unless the particular activity is exempt from lock-out/tag-out under applicable occupational safety and health laws, rules, and regulations and performed in accordance with those regulations.
- B. Subcontractor employees shall only use locks designated for lockout/tagout.
- C. Lockout tags used by Subcontractor employees must have a place for their name, cell phone number and date.
- D. Zip or wire ties, string, cords, or tags only are not considered acceptable equipment for lockout/tagout purposes. Tags must always be accompanied by a lock and key.

XX. CRANES

- A. Crane operators must submit a copy of their valid training records and certification to the Company before they perform any type of lift on site.
- B. Daily inspections are required on all cranes before and during use. Daily inspection records shall be kept and made available to the Company upon Company request.
- C. Annual crane inspections, along with daily inspections, must be performed onsite and in the crane.
- D. Tag lines must be used for all loads. Tag lines will help control the load in windy conditions that may cause the load to swing, rotate, or become unbalanced.
- E. Subcontractors using cranes must post a copy of the crane hand signals that will be used.
- F. Subcontractors shall comply with the manufacturer's recommended maintenance and safety requirements.
- G. During the lift, no person can be underneath or in any area close to the lifted object where they could be impacted by an unexpected fall or movement of the lifted object.

XXI. HELICOPTER "EXTERNAL LIFT"

- A. Helicopter cranes shall comply with (i) applicable occupational safety and health laws, rules, and regulations; and (ii) worksite safety rules and those rules promulgated by the Company's customer.
- B. Subcontractors shall comply with all of the manufacturer's recommended maintenance and safety requirements.

XXII. HOUSEKEEPING

The worksite must be kept clean and free from hazards. Housekeeping must be conducted on a daily basis. The Company may issue a stop work order if housekeeping on the site is disregarded.

XXIII. POWERED INDUSTRIAL VEHICLES / FORKLIFTS

- A. Only trained and authorized individuals will be permitted to operate powered industrial equipment.
- B. Personnel must not stand or pass under the elevated portion of any vehicle, whether loaded or empty. The Subcontractor is responsible for placing appropriate warning signs or controlling access when work is done near doorways where personnel may inadvertently walk into the hazard area.
- C. When a powered industrial vehicle is left unattended the in addition to any precautions required by law or the contract, the following precautions must be taken:
 - 1. Load engaging means must be fully lowered
 - 2. Controls must be neutralized
 - 3. Power must be shut off
 - 4. Brakes must be set.
 - 5. Wheels should be blocked if the vehicle is parked on an incline.
- D. Powered industrial vehicles / forklifts shall be inspected daily before being placed into service.

XXIV. CONFINED SPACE

- A. In addition to any precautions required by law or the contract, the entry into a confined space without the proper training, personal protective equipment and safety equipment is prohibited.

XXV. HAZARD COMMUNICATION

- A. All Subcontractors shall share information with one another and the Company regarding the hazardous materials that they are working with on site.
- B. Each Subcontractor is responsible for maintaining accessible safety data sheets for products it brings on site and for training its personnel on the proper handling, storage and disposal requirements of hazardous materials. Upon request, Subcontractors shall submit to the Company, a chemical inventory list and safety data before onsite work begins.

XXVI. JOB SITE ACCESS



- A. Subcontractors and their visitors shall follow the Company or its customer's Access and Security Requirements when entering and exiting the job site.
- B. Subcontractors and their visitors shall follow the Company or its customer's Vehicle Access Requirements while at the job site.

XXVII ENVIRONMENTAL AND WASTE MANAGEMENT COMPLIANCE

- A. All Subcontractors agree to abide by all (i) applicable environmental, occupational safety and health laws, rules, and regulations; and (ii) worksite environmental rules and those rules promulgated by the Company's customer.
- B. All Subcontractors performing services related to environmental compliance, planning, or remediation shall provide written assurance that they have, and will maintain in effect, all required certifications and insurance that provides coverage for risks resulting from the release of hazardous substances or contaminants to the worksite and the environment.
- C. Subcontractors should refer to the safety data sheet for the proper storage and handling of chemicals.
- D. All Subcontractors shall be responsible for the removal of all hazardous wastes or substances generated during their onsite work.
- E. All Subcontractors agree to indemnify the Company and its customer against any claim by any entity, private or governmental in nature, arising out of environmental contamination caused or exacerbated by the Subcontractor during the course of its work.
- F. All Subcontractors shall respond to spills and to releases of hazardous substances, dispose of contaminated clean-up materials, and dispose of contaminated soils in accordance with (i) applicable environmental, occupational safety and health laws, rules, and regulations; and (ii) worksite environmental rules and those rules promulgated by the Company's customer. All Subcontractors must also report immediately each spill or release event to the onsite Company project manager/representative.

XXVIII ADDITIONAL REQUIREMENTS/CONSIDERATIONS

- A. In addition to the safety requirements otherwise required by this Agreement, Subcontractor shall comply with all safety requirements for the Project including but not limited to the Company's customer worksite safety requirements and any and all higher tier and Subcontractor safety programs, procedures and rules. Subcontractor shall also comply with all laws, rules and regulations of any governmental body that has jurisdiction over the project. To the extent that there is more than one safety rule, regulation or law that applies to a given activity of the Subcontractor, the more stringent rule shall apply. Subcontractor shall advise all higher tier subcontractors and subcontractors of all safety issues not otherwise covered by any of the requirements of this Agreement. To the extent that the Subcontractor seeks to vary, change, or otherwise alter any required safety practice, application or procedure, then the Subcontractor will complete a job hazard analysis. If Subcontractor varies, changes, or otherwise alters any safety practice, application, or procedure, then Subcontractor assumes complete and exclusive responsibility and liability for such change.
- B. Subcontractor, by signing this Agreement, represents that it shall take all necessary precautions while performing its work to ensure the safety of its personnel, the personnel of other subcontractors and third parties.
- C. Subcontractor represents that it has studied and is familiar with all of the applicable requirements promulgated by any government authority, including, without limitations, the applicable requirements for the Occupational Safety and Health Act (OSHA); all applicable regulations published in 29 CFR parts 1910 and 1926; all applicable state occupational safety and health acts and any applicable regulations promulgated thereunder; and any other lawful orders of any public authorities bearing on the safety of persons or property or their protection from damage, injury, or loss; as well as any safety or health programs published by any higher tier contractor, the Company and its customer. Upon request, Subcontractor shall provide a written safety program that complies with these governmental requirements and safety and health programs.
- D. Subcontractor agrees that it shall be liable for the actions, failures to act, failure to comply with these Subcontractor Safety Specifications, or violation of any laws by any of its subcontractors, agents and/or personnel.
- E. Subcontractor agrees that, if an action is undertaken against the Company for violations of any governmental safety requirements by the Subcontractor and/or its subcontractor(s), agents or personnel, Subcontractor shall indemnify and hold harmless the Company and its customer for all costs, damages and penalties assessed against the Company and its customer or related to this action including attorney's fees incurred in the defense or appeal of such action.

Subcontractor agrees that it is an independent contractor. These Subcontractor Safety Specifications do not give the Company the power to direct and control the day-to-day activities of the Subcontractor or of create a relationship of employer/employee, partners, joint ventures, co-owners, principal-agent, or otherwise participants in a joint or common

EHS Safety Specifications: Contingent Labor and Subcontractors

Zero Harm Behaviors

Zero Harm Behaviors



Stop work

It is your responsibility to stop work and report risks that you cannot mitigate.



Working at height

Only use approved work at height equipment that is appropriate for the task.



Lock out, tag out

Lock out, tag out saves lives – comply with all steps of the LOTO process at all times.



Electrical work

Never work on live equipment, including troubleshooting and diagnostic testing, unless it is the only possible option for diagnostic testing.



Confined spaces

You need a permit to work in a confined space and you must verify that all required control measures are in place.



Chemical exposure

Protect yourself: know the chemical hazards, properties and precautions.



Hot work

Hot work (welding, burning, brazing, grinding, flame cutting, etc) is NOT permitted unless adequate control measures are in place.



Safe driving

Avoid distracted driving. Keep your mind and eyes on the task to stay safe.



Traffic on site

Keep your mind and eyes on the task to stay safe.



Lifting

Lifting and handling can cause serious injuries. Think before you lift and consider using lifting equipment.



PPE

Do not start work without wearing all required PPE. All PPE must be in good condition and the user trained on its correct use.

The power behind your mission

