

Your Company Name

# General Construction Safety

*This document was created by  
Lovell Safety Management Co., LLC for  
use by its Group Members.*

*Please see the next page for details on how  
this document is to be used and its'  
limitations.*

*Additional, hazard specific, modules are  
available from LSM.*

# ADDITIONAL SAFETY POLICY MODULES

Available from Lovell Safety Management Co., LLC

[www.lovellsafety.com](http://www.lovellsafety.com) 1-212-709-8899

## Policy Modules

1. Asbestos Safety Policy
2. Confined Space Policy
3. Contractor Safety Policy
4. Crane Safety Policy
5. Electrical Safety Policy
6. Emergency Evacuation Plan
7. Excavation and Trenching
8. Fall Protection Policy
9. Fleet Safety Policy
10. Forklift Safety Policy
11. General Construction Safety
12. Hazard Communications + GHS
13. Ladder Safety Policy
14. Lockout Tagout Policy
15. Noise In Construction Policy
16. Personal Protective Equipment
17. Respiratory Policy
18. Scaffold Policy
19. Silica in Construction Policy
20. Spill Prevention Policy
21. Tool Safety Policy
22. Waste Management Policy

## Procedures Modules

1. Confined Space Entry Procedure
2. Crane Safety Procedure
3. Excavation & Trenching
4. Fall Protection –Roofing
5. Fall Protection Procedure
6. LOTO Procedure
7. Precast Fall Protection
8. Residential Construction  
Fall Protection
9. Scaffold Safety Procedure

**PLEASE READ THIS PAGE BEFORE USING**

**This safety & health program and all the attachments are not company specific. It is the employer's responsibility to ensure that the appropriate changes are made to this policy to better reflect the specifics of the operation. You'll need to go through the policy and the applicable attachments and make them more company specific by inserting Your Company Name where appropriate and the names of employees in charge of implementing various aspects of the policy.**

This program was designed by Lovell Safety Management Co., LLC to provide our Group Members with information on establishing an effective Safety Management Program to help prevent costly work related injuries and to support compliance with OSHA workplace safety regulations.

The practice of occupational safety and health and its related regulatory programs are constantly under review and change. Additionally, there are significant differences in professional interpretation of regulatory standards and pertinent occupational safety and health information. In order to prevent costly work related injuries and occupational illnesses with the resulting worker's compensation insurance claims, all employees must be properly trained and held accountable for safety. Employees must understand all known hazards presented in their work environment and be able to respond appropriately to unplanned hazards which may arise. The responsibility for complying with regulatory requirements and staying current with regulatory issues resides with the employer.

This publication is not intended to take the place of legal or professional assistance. If legal advice or other expert assistance is required with regard to a specific issue confronting an employer, then the services of a competent professional should be sought accordingly. No representation can be made or responsibility taken by the publisher regarding the completeness, accuracy, or continued validity of the information in this publication.

This program does not address every item in 29 CFR 1926, nor is it intended to address motor carrier safety regulations, environmental safety regulations, or local codes and ordinances. The manual addresses several areas related to the prevention of workplace injuries and accidents faced by employers engaged in "Construction" operations. It is very important to understand that under Federal Law you are responsible for compliance with all standards and regulations of 29 CFR 1926 which apply to your work areas and operations. All employers are encouraged to obtain and become familiar with, a copy of the OSHA Construction Industry Safety and Health Standards, 29 CFR 1926, published by both the U.S. Govt. Printing Office and several private printing firms. The OSHA web page is also a very valuable resource: [www.osha.gov](http://www.osha.gov)

**Lovell Safety Management Co., LLC**

## **CORPORATE MANAGEMENT POLICY STATEMENT AND SAFETY GOALS**

The personal safety and health of each employee of our organization is of primary importance. We believe that our employees are our most important assets and that their safety at the worksite is our greatest responsibility. The prevention of occupationally induced injuries and illnesses is of such consequence that it will be given precedence over operating productivity whenever necessary. Management will provide all mechanical and physical facilities required for the personal safety and health of each of its employees.

To be successful, such a program must embody the proper attitude toward injury and illness prevention on the part of corporate management, supervisors, and employees. Cooperation between our employees and management in the observance of this policy will ensure safe-working conditions, will minimize the risk of accidents, and will work to our mutual advantage. It will also assist in reducing workers' compensation costs (direct costs) and reduce jobsite down time, material loss and regulatory agency fines (indirect costs).

Our goals are to reduce employee injury, prevent potential hazards through consistent safety management, and ensure compliance with relevant safety and health standards. Through the attainment of these goals, our company will remain competitive and viable in our industry.

Management will procure the necessary resources to execute the objectives of our company's safety and health program. We will hold managers, supervisors and employees accountable for meeting their safety responsibilities.

### **MANAGEMENT SAFETY RESPONSIBILITIES**

1. Eliminate potential hazards by providing appropriate safeguards, personal protective equipment and safe work tasks.
2. Provide necessary personal protective equipment and enforce its use and care.
3. Provide effective safety and health training to all employees.
4. Be familiar and comply with applicable OSHA standards.
5. Review, consider for approval, and execute appropriate action on safety policies.
6. Ensure a high level of productivity and safety performance and hold project management staff accountable.
7. Ensure that worksites have designated competent person(s) with the authority to enforce the safety program and take corrective actions.

### **SUPERINTENDENT/FOREMAN RESPONSIBILITIES**

1. Know safety rules and work practices that apply to the work you supervise. Take action to confirm that all employees in your charge understand the safety rules that apply to them. Always take immediate action to correct safety rule violations. Unsafe acts or procedures cannot be tolerated.
2. Prevent bad work habits from developing. You are responsible to make daily observations of employees to ensure that they perform their work safely, and continue this observation regularly once safe working habits are established.
3. Take action to correct or control hazardous conditions within your work areas. If it is beyond your control, remove employees until conditions are safe.

4. Encourage workers to report unsafe conditions or procedures. Listen to your workers and don't take their safety complaints lightly. No job should proceed when a question of safety remains unanswered. Seek advice from your project manager when necessary.
5. Lead by example. Demonstrate safety in your own work habits and personal conduct. Always wear personal protective equipment in areas where personal protective equipment is required.
6. Train your employees on the proper safety procedures to follow, including the use of additional safeguards such as machine guards and personal protective equipment.
7. Investigate and analyze every accident and near misses that occur to any of your employees or on your worksites. Control the causes of minor incidents to help avoid potential accidents.
8. Complete and file a report on each and every incident and accident that occurs at your jobsite. If you have questions or require reporting forms, contact the main office.
9. Conduct safety toolbox meetings regularly.
10. Make safety suggestions and solicit safety suggestions from employees.
11. Serve on safety committee, if requested.
12. Take an active part and participate in safety meetings.
13. Failure to comply with these rules as well as other federal and/or state laws or regulations may be legal violations and could lead to civil and/or criminal penalties.

#### **EMPLOYEE RESPONSIBILITIES**

1. Know and obey all safety rules, government regulations, signs, markings, and instructions. Be particularly familiar with the rules and regulations that apply directly to you in the area in which you work. If you don't know, ask your supervisor/foreman.
2. Additional appropriate disciplinary action will be taken for the following offenses:
  - a. Fighting - no matter what the cause.
  - b. Insubordinate conduct or refusal to follow directions.
  - c. False statement, such as injury claims.
  - d. Other inappropriate behavior including, but not limited to, failure to obey safety rules.
3. Loose clothing, shorts, tank tops, and jewelry cannot be worn on worksites. Attire appropriate for a construction site is required on all worksites.
4. Proper work shoes shall be worn at all jobsites. Open toed shoes and sneakers are not permitted. If you are observed wearing open toed shoes or sneakers, you will not be permitted to work until you return with proper footwear.
5. Hardhats, work boots/shoes, and eye protection shall be worn at all times.
6. Do not handle chemicals unless you have been trained in the safe handling procedure.
7. Read, understand and follow the guidelines set forth in the Safety Data Sheets (SDS) pertaining to your work.

8. Compliance with safety and health rules and regulations is a condition of employment.

## **GENERAL WORKSITE RULES**

1. Report potentially unsafe conditions to your supervisor/foreman immediately.
2. The use, possession, or sale of alcohol or illegal drugs is prohibited.
3. If asbestos, lead, PCBs or other potentially hazardous materials are encountered during operations, stop work immediately and notify a supervisor.
4. Be aware of the emergency action plan. Know the alarm signals, evacuation routes, and locations of emergency numbers.
5. All injuries, no matter how minor, should be immediately reported to the supervisor/foreman.
6. Do not enter barricaded areas and obey all warning signs.
7. Proper clothing should be worn at all times on site. Proper clothing includes long pants and shirts with at least 4-inch sleeves below the shoulder.
8. Protruding nails should be removed from material and forms. Stack clean lumber in orderly piles.
9. Do not stand under or beside suspended loads.
10. Horseplay of any kind is forbidden.
11. Firearms and weapons are forbidden.

### **Housekeeping**

1. Materials should be kept in neat stockpiles for easy access. Aisles should be kept clear of loose materials, tools, cords and waste.
2. Remove waste from site on a frequent basis and dispose of it in a suitable manner.
3. Remember that no materials or debris will be stored in the path of other employees or the public.

### **Tools**

1. Every tool is designed for a certain job and should only be used for that purpose.
2. Keep tools in peak condition. Worn tools are dangerous and should be tagged and removed from service.
3. Don't force tools beyond their capacity or use cheaters to increase leverage.
4. Do not use power tools unless you are completely familiar with them.
5. Before using a power tool, examine it for damaged parts, loose fittings, frayed or cut electrical cords. Tag and remove defective tools from service.
6. Do not use tools with improper or damaged guards, or with guards removed.
7. Powder actuated tools will not be used onsite without management approval.

### **Electrical Safety**

1. Ground fault circuit interrupters are required to be used for electrical tools and equipment.
2. Examine all cords prior to use. Cords which are frayed, worn, or contain exposed wires should not be used, and should be tagged and removed from service immediately.
3. All cords should be of the three-wire type and designed for hand or extra-hard usage. Flat yellow extension cords and Romex extension cords are prohibited.
4. All live electrical installations such as receptacles, switches, and panel boxes, should be protected by a faceplate or cover. Cardboard is not an acceptable cover.
5. Bulbs used for temporary lighting should be covered by protective cage guards.
6. Cords should be kept clear of walkways and other locations where they may be subject to damage or present a tripping hazard.
7. Protect cords from foot and vehicle traffic, and sharp corners and edges.
8. All electric equipment and metals should be of an approved type.
9. All plugs, outlets, switches and panel boxes should be installed according to the national electric code. This includes assuring that receptacle boxes are permanently affixed, Romex type NM cable is not used in damp or wet locations, and that temporary wiring is located where it will not be subject to damage.
10. Only qualified workers should be allowed to perform any type of electrical work.
11. All ground fault circuit interrupters should be inspected prior to each use.

12. Receptacles should be tested for polarity and continuity of the ground. Receptacles whose polarity is reversed or whose ground is not continuous should be tagged out until repaired.
13. Missing knockouts inside panel boxes, on receptacle boxes and on all other equipment continuing live parts should be covered or otherwise protected.
14. When using an extension cord off of permanent power, the extension cord is considered to be temporary power and therefore must have GFCI protection.

#### **LOCKOUT/TAGOUT**

1. Locks and tags should be used to prevent operation of a switch, valve, or piece of equipment in cases where someone may get hurt or equipment may be damaged.
2. Never operate any tagged-out piece of equipment.
3. Place your lock personally; never have someone else do it.
4. Do not remove someone else's tag.
5. All locks and tags should be labeled to identify their owner.
6. Follow all switching and locking procedures to remove a piece of equipment from service.

#### **MATERIAL HANDLING, STORAGE AND DISPOSAL**

##### *By Hand*

1. Know the weight of any object to be handled. If it is too heavy or bulky, get help.
2. Ensure a safe path of travel.
3. Establish firm footing, keep your back straight and lift with your legs. Lift gradually; do not jerk or twist. Reverse the motion when setting the object down.
4. Know the weight of the object to be handled, and the capacity of the equipment you intend to use.
5. When placing blocks under raised loads, make sure blocking material is large enough to support the load safely. Additionally, ensure that the load is not released until employees have clearly moved away from the load.

##### *Storage*

1. Store materials so as not to block exits, aisles and passageways, and access to fire extinguishers and electrical panels.
2. Materials stored in tiers should be secured to prevent sliding, falling and collapse.
3. Materials stored inside should not be placed within 6 feet of any hoistway or inside storage area, or within 10 feet of an exterior wall which does not extend above the materials stored.
4. Brick stacks should not be more than 7 feet in height. Loose brick stacks should be tapered back 2 feet every foot above 4 feet level.
5. When masonry blocks are stacked higher than 6 feet, the stacks should be tapered back ½ block for each tier higher than 6 feet.
6. Lumber should not be stacked more than 16 feet high if it is handled manually; 20 feet is the maximum stacking height if a forklift is used.
7. Bags and bundles should be stacked in interlocking rows to remain secure. Bagged material should be stacked by stepping back the layers and cross-keying the bags at least every 10 feet.
8. Drums, barrels, and kegs should be slacked symmetrically. If stored on their sides, the bottom tiers should be blocked to keep them from rolling. If stored on end, put planks, sheets of plywood, or pallets between each tier to make a firm, flat, stacking surface.

##### *Rigging*

1. Slings should be inspected before use.
2. Slings and other rigging equipment should be removed from service if damage or defects are visible.
3. Slings should not be shortened with knots, bolls, or other makeshift devices.
4. Slings should not be loaded beyond their rated capacity, according to the manufacturer's instructions.
5. Job or shop hooks and links, or makeshift fasteners, formed from bolts, rods, or other such attachments should not be used.
6. When U-bolts are used for eye splices, the U-bolt should be applied so that the "U" section is in contact with the dead end of the rope.

## **WELDING & CUTTING**

1. You should be instructed in the safe use of welding equipment before using. If working in NYC you must have the proper NYC FDNY Certificates of Fitness.
2. Each welder is responsible for containing sparks and slag and/or removing combustibles to prevent fire.
3. All employees engaged in welding and burning operations should use a face shield, goggles, or appropriate welding helmet and welding gloves.
4. No arc or flame welding operation is permitted in areas where the application of flammable paints is taking place or where combustible dust or flammable liquids are present.
5. A suitable fire extinguisher should be located in welding areas at all times.
6. When practical, objects to be welded, cut, or heated should be moved to a designated safe location, or if the object to be welded, cut or heated cannot be readily moved, all moveable fire hazards in the vicinity should be taken to a safe place, or otherwise protected.
7. Ensure that a hot-work permit has been obtained from General Contractor if applicable.
8. Fire Guards will maintain a log book.
9. Fire Guards will be present during hot work with extinguisher on hand and will inspect ½ hour after the completion of hot work and another ½ hour later.

## **Stairways & Ladders**

A stairway or ladder should be provided at all points of access where there is a change in elevation of 19 inch or more and no ramp, runway, sloped embankment or personal hoist is provided.

### *Stairways*

1. Stairways should be kept free of hazardous projections such as nails and screws.
2. Slippery conditions on stairways should be eliminated before the stairways are used.
3. Stairways greater than 30 inches high or with four or more risers should be equipped with at least one handrail, and one stair rail system along each unprotected side or edge.

### *Ladders*

1. Inspect ladders before use. Ladders with broken or missing rungs, cleats or steps, broken or split rails, or corroded parts should be tagged out and removed from the jobsite immediately. Use the ladder inspection checklist (Appendix B).
2. Ladders used to access an upper floor or platform should extend three feet above the upper landing surface.
3. When in position, a ladder should be securely tied at the top to prevent slipping or secured at the base by a fellow employee.
4. Ladders should be erected exercising the 4:1 ratio: for every four feet of working length off the ladder, the base will be placed one foot from vertical.
5. The area at the top and bottom of ladders should be kept clear at all times.
6. Always face a ladder when ascending or descending and maintain at least three points of contact with the ladder at all times (e.g., two feet and one hand).
7. Make sure ladders are free from ice, snow, mud, or other slippery materials before use.
8. Never use a ladder in a horizontal position as a platform or scaffold.
9. A double cleated ladder or two or more separate ladders should be provided if ladders are the only means of access/exit from a working area of 25 employees, or the ladder serves simultaneously two-way traffic.
10. Ladders should be used only for the purpose for which they were designed. Ladder rungs should not be used to support the ends of planks or other similar work platforms.

### *Step Ladders*

1. Do not use ladders in the folded position as a straight ladder would be used. Open the legs and secure the locking mechanism.
2. Do not stand on the top two steps of a step ladder.



## **MOTOR VEHICLE SAFETY**

1. Seat belts should be worn at all times by employees operating or riding on motor vehicles or machinery. (Exceptions: equipment designed for stand-up operation.)
2. Vehicles used to transport employees should have seats firmly secured and adequate for the number of employees to be carried. Employees should not ride on fenders or running boards or any other piece of equipment not meant for human occupancy.
3. Horns should be in working order on all bi-directional machinery.
4. Motor vehicle equipment with an obstructed view to the rear should not be operated unless the vehicle has a reverse signal audible above the surrounding sound or the vehicle is backed up only when an observer signals that it is safe to do so.
5. Operators of all motor vehicle equipment are responsible for the safe operation of their vehicle at all times.

## **FORKLIFT OPERATION**

1. Only the driver is permitted to ride on forklift trucks.
2. Seat belts must be worn at all times.
3. Operator must have the appropriate training certification available.
4. Do not exceed the rated capacity of the forklift,
5. Keep forks down. Operate with forks just high enough to clear obstructions.
6. Operate the truck in reverse if the load is too high or too wide to see around.
7. Park with the forks down and the parking brake set.

## **HEAVY EQUIPMENT OPERATION**

1. Heavy equipment such as back hoes and dump trucks will only be operated by authorized personnel.
2. Unauthorized persons are not permitted to ride in the cabs of heavy equipment.
3. Lower any movable buckets when you stop the vehicle.
4. Always block any movable bucket if it is being inspected or having maintenance.
5. Report all operating malfunctions immediately.
6. If the operator's compartment is designated a high noise level area, hearing protection should be worn.
7. Maintenance or repairs should not be done with the engine running.

## **SAFETY AND HEALTH TRAINING**

Our employees will receive safety and health training in accordance with the job tasks they are required to perform, and for the hazards they may encounter on the job. If employees receive training through their union or through their previous employer, their training credentials should be verified prior to any work activities.

Toolbox talks of 5 to 10 minutes must be held by superintendents and/or foreman.

The subject to each training talk should be chosen to relate to the type of work that is being performed. For example, the use of safety glasses when using circular saws, grinders, table saws, radial arm saws, jack hammers, power actuated tools, etc.

A log of Tool Box Talks with employee attendance/sign in sheets will be kept on site. Copies should be forwarded to the home office.

## **RETRAINING**

When the Your Company Name has reason to believe that an employee lacks the skill or understanding needed for working safely, management shall ensure that such employee is retrained so that the prerequisite proficiency is regained. Retraining is required in at least the following situations:

- Where changes at the jobsite present a hazard about which an employee has not been previously trained; or
- Where inadequacies in an affected employee's knowledge or skills indicate that the employee has not retained the requisite proficiency.

## **NEW EMPLOYEE TRAINING**

All new employees will be trained by a member of the management staff prior to starting work. The "New Employee Safety Orientation Checklist" shall be used by trainers (managers, superintendents, foremen, safety professionals, etc.) as a reminder of the items that must be reviewed with the employee. All items must be initialed or identified as not applicable. The employee must sign the checklist and the management representative after the orientation is complete.

This form will be given to the project manager or home office and kept in the employee's personnel file.

## New Employee Safety Orientation Checklist

Instructions to Trainer: Initial each item as you discuss it with the employees. This checklist must be completed before the employee starts work.

<u>Item</u>	<u>Completed</u>
1. Employee received Company Safety Program	_____
2. Review:	
· Safety and Health Policy	_____
· Employee General Safety and Health Rules	_____
· Disciplinary Policy and Procedures	_____
· Employee Responsibilities	_____
3. Instruct:	
· How to report unsafe conditions	_____
· What to do in the event of an injury on the job	_____
· State when and where safety tool box meetings are	_____
· Use of required personal protective equipment	_____
· Explain Fire Evacuation/Emergency Plan	_____
· Proper lifting techniques and importance of back fitness	_____
· Hazcom Policy and provide training	_____
4. Other (Please List)	
_____	_____

I acknowledge that information on the above subjects was furnished to me during my orientation and that I understand this information and was given the opportunity to ask questions.

Employee Signature

Trainer Signature

\_\_\_\_\_

\_\_\_\_\_

Date

Date

\_\_\_\_\_

\_\_\_\_\_

## **COMPETENT PERSON DESIGNATION**

It is the responsibility of top management to appoint an individual as a competent person who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them. A competent person will be designated for each worksite and for each operation requiring a competent person. The designation of the competent person will be in writing.

There is the possibility that more than one competent person may be necessary, depending on the range of hazards on the project, the size of the project, and the distance between operations on a project.

## **REPORTING UNSAFE CONDITIONS/BEHAVIORS**

All site employees are responsible for reporting unsafe conditions or risky behavior immediately to their supervisor/foreman. If the employee feels more comfortable reporting the condition or behavior to upper management, the employee may do so. Employees are encouraged to report unsafe conditions and behaviors without fear of retaliation. Your Company Name will investigate all reports of unsafe conditions or behaviors and take corrective action as necessary.

## **ACCIDENT/INJURY REPORTING, FIRST AID, BLOODBORNE PATHOGENS**

Our company will provide first aid supplies at each work location and all personnel are to know procedures to follow in case of an emergency.

1. Report all injuries immediately, no matter how minor, to your foreman and/or jobsite office.
2. Emergency phone numbers for fire, police and ambulance will be posted.
3. Please note that if any employee renders first aid or uses a first aid kit to assist a co-worker (although such action is not required by anyone's duties) we would view this activity as a "Good Samaritan" act.  
Note: First aid kits are to be approved by a licensed medical doctor.
4. In the rare occurrence that medical attention is not available within 3-4 minutes, the Your Company Name will provide a trained first aider on each shift.
5. Work-related fatalities must be reported to OSHA within 8 hours of finding out about them.
6. Any inpatient hospitalization, amputation, or eye loss must be reported to OSHA within 24 hours of learning about it.

## **ACCIDENT INVESTIGATION**

Each superintendent or foreman will make a documented report of every incident, even those without injury, within twenty-four (24) hours of the occurrence. Reports are to be completed as soon as possible to avoid changes in physical conditions and witness reports. Note: Any accident that causes a fatality or three or more employees to be hospitalized must be reported to OSHA within eight hours of the incident.

Accident reports highlight problem areas. Through the use of good reports, accident patterns can be detected and resources directed toward prevention. Accident reports make excellent training tools. The cause and effect of accidents can be reviewed at safety meetings.

- Superintendents and foremen will be trained in accident investigation techniques.
- Accident investigation is a management function that must be executed at the superintendent/foreman level.

- All accidents/incidents must be investigated regardless of the extent of the injury or damage.
- Employees will never be allowed to fill out their own accident investigation report.
- Focus must be fact finding *not* fault finding.
- Superintendents and foremen must identify the unsafe act or unsafe condition.
- Superintendents or foremen should obtain witness accounts as soon as possible.
- Superintendents and foremen should provide recommendations for *corrective actions* and management will ensure implementation.
- Superintendent/foreman will be provided with an accident investigation form.

## **RECORDKEEPING**

Records must be maintained and kept up to date by the superintendent or foremen at each jobsite and/or office. These records must be available for review at all times. The following records must be maintained.

Supervisor's Investigation and Record of Incident

OSHA LOG (form 300) <http://www.osha.gov/recordkeeping/RKforms.html>

Jobsite inspection forms/notes

Log of Tool Box Talks (include names and signatures of employees present)

Required equipment documentation (i.e. permits, inspection records, maintenance log)

Hazard Communication Plan and Safety Data Sheets

Required Regulatory Training Records (i.e. OSHA, NYC DOB, etc.)

OSHA Poster Explaining Employee Rights <http://www.osha.gov/Publications/poster.html>

Accident Forms - Medical Records

Safety Policy

Emergency Phone Number List

## **SUBCONTRACTOR COMPLIANCE**

All subcontractors will comply with all federal, state, and local safety and health laws. Contractual agreements with subcontractors will state that they must provide the following:

Certificate of Insurance

Hazard Communication Plan, Chemical Inventory List, and Safety Data Sheets (SDS's)

Safety Program

Name and phone number of safety contact or competent person.

The subcontractor will provide documentation that all of their employees have received all required safety and health training prior to working on any of our jobsites. Safety and health training of the subcontractor's employees will be the sole responsibility of the subcontractor.

All subcontractor employees will be required to arrive on-site with the required personal protective equipment. No subcontractor employee shall be granted access to the jobsite without the required PPE. It is the subcontractor's responsibility to ensure their employees adhere to the PPE policy of the jobsite.

Any subcontractor's employee observed violating jobsite safety rules or other safety and health policies are subject to removal from the jobsite.

## **SUPERINTENDENT/FOREMEN SELF-INSPECTION**

It is our policy to reduce and eliminate hazard exposures that can lead to employee injury or property damage. Self-inspection is one way to provide a safe workplace for our employees.

Super/foreman is required to make daily visual inspections of their work areas and to test all equipment safety devices prior to the start of the work shift. Corrective action must be provided immediately if any hazards exist or if any safety devices are not functioning properly. If the equipment cannot be repaired before being used so that it is safe to use, then it must be removed from service.

Super/foreman is required to complete a weekly inspection of the work site using a checklist. If any hazardous conditions are noted, corrective action must be taken. If the corrective action is beyond our authority and/or capability, keep all employees away from the hazardous condition until it is corrected or controlled. Notify the project manager in writing to request corrective action. Super/foreman is expected to follow up on reported hazards to make sure they have been eliminated or controlled.

All completed checklists, signed and dated by the super/foreman where indicated must be turned into the home office on or before the last work day of each week.

Lack of appropriate inspections as well as falsification of inspections is a violation of company procedure and may be a civil and/or criminal violation of federal and/or state laws and/or regulations.

## **DISCIPLINARY POLICY PROCEDURES**

All employees are expected to comply with jobsite rules and regulations, and to follow established operating procedures set forth by this company. Violations will not be tolerated and superintendent/foreman will be held accountable for the conduct of their employees.

Superintendents and foremen are required to take action when a violation is observed. Immediate action to control or eliminate a hazard is required.

In the event a violation is observed, the following procedures have been established to place an employee on notice.

### **First Offense**

A written warning addressed to the employee and a copy placed in the employee's file referencing the violation and warning, including date and time.

### **Second Offense**

A written warning addressed to the employee with reference to the violation including date and time of the occurrence. A copy of this warning will be given to the employee, the union shop steward, and another copy will be placed in the employee's file.

### **Third Offense**

A written warning similar to the second notice will be prepared and distributed in the same manner. This warning will be followed by a meeting with the employee, union shop steward, foreman and/or project manager and senior management to determine whether the employee will be suspended without pay or terminated depending upon the nature of the violation.

### **Fourth Offense**

Termination

\* Within any consecutive 12 month period.

\* This policy is in effect unless there is a policy in our labor/management agreement.

The above procedure has been prepared so that there is no question about how violations of rules, regulations, and procedures will be handled by management and so that employees will know what to expect if they do not comply with the established rules, regulations, and procedures. Management knowledge of unsafe behavior and lack of appropriate documented discipline may be a violation of federal, state laws and regulations.

## **DRUG AND ALCOHOL PROGRAM**

### **Policy Statement**

Your Name Company will not tolerate or condone substance abuse. It is our policy to maintain a workplace free from alcohol and other drug abuse and its effects.

It is the policy of Your Name Company that employees who engage in the sale, use, possession or transfer of illegal drugs or controlled substances, or who offer to buy or sell such substances; the use of alcohol during working hours; or the abuse of prescribed drugs will be subject to disciplinary action up to and including termination.