Health and Safety Manual

REVISION: 06

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Policy Statement

To All Employees:

Independence Construction (IC) recognizes that our employees are our greatest assets. In addition, we recognize that without our employees we could not compete in the marketplace nor be as successful as we are. With that thought in mind, it's our sincere desire to provide our employees with a safe workplace to work.

To meet this goal, Independence Construction (IC) intends to elevate employee safety and health above production and to comply with and/or exceed the safety and health standards required by OSHA or any other state or local safety requirements. If our employees observe any conditions or equipment that appears to be unsafe, employees have the right and obligation to report the condition to management before work is performed. It is imperative that our employees report such issues and not expose themselves to any unsafe conditions.

If an employee is observed violating, or failing to conform, to our safety policies and procedures or committing an unsafe act contrary to management policies, the employee may be subject to disciplinary action appropriate to the observation, up to and including discharge.

If there are any questions concerning this company policy, feel free to contact me at your earliest convenience.

Sincerely
Domonic Deluca, President

General

This manual provides assistance in complying with 29 CFR Part 1926 and 1910 regulations (OSHA standards) as well as all other applicable regulations and standards. This manual shall be reviewed and updated annually at a minimum, as applicable. The intent of the content is to make available, accurate and authoritative information concerning health and safety. This program is in no way a substitute for a Subcontractor's safety program, which must meet or exceed requirements specified herein.

If there is a conflict or difference between the information contained herein, the most stringent standard or policy must be followed. All deliverables, records, documents, inspections, and training referenced herein shall be made available immediately upon request. Timely access is required to ensure transparency, compliance, and efficient project oversight.

The IC Safety Team reserves the right to evaluate and determine what is best for the safety of the project, at any time, and therefore may determine or authorize alternative methods to complete a task(s) safely. A Risk Mitigation Plan (RMP) may be prepared through mutual agreements with IC Teams and certain Subcontractors for various reasons before beginning a project. RMP's may also be created with IC Teams and certain Subcontractors to mitigate continued unsafe action(s). Project level RMP's used to create variances for safe production must still comply with regulatory agencies. Together the Project Team and Subcontractor will create and submit project level RMP's to IC Safety. Before becoming effective, IC Safety must approve project level RMP's.

Hierarchy of Controls – Prevention, Elimination, Substitution, and Engineering Controls should be the first method to safety planning and hazard mitigation. If those controls are not feasible, Administrative / Warning Controls should be implemented. If those controls are not feasible, then specific Personal Protective Equipment shall be implemented.

Horseplay of any kind will not be tolerated (zero tolerance policy) and is forbidden on projects sites and/or Company premises (including Company vehicles and/or equipment). Horseplay is rough or boisterous play or pranks that occur at the workplace. Horseplay can be activities such as joking that includes physical contact, playing around, racing, grabbing, foolish vehicle operation, social pressure to participate in unsafe acts, harassment, and unauthorized contest.

The use of radios, headphones, ear buds, air pods, or any personal music devices are prohibited while in designated construction areas. The use of mobile devices are to be used for work purposes only and must be used in a safe manner and location.

The use of tobacco products and vaping devices are strictly prohibited except in designated smoking areas as authorized and approved by the IC Safety Team in advance. All employees and visitors must comply with this policy to maintain a safe, clean, and healthy work environment.

Each Subcontractor shall ensure effective communication and translation for all of their personnel by providing accurate and timely translations of essential documents and communications when applicable.

Daily Safety Pre-Planning

Daily safety preplanning ensures that all tasks are reviewed for potential hazards before work begins. Supervisors and crews must discuss the day's activities, identify risks, establish controls, and confirm everyone understands the plan. This proactive approach promotes communication, prevents incidents, and supports a safe, efficient work environment.

A daily safety pre-plan must be completed by every crew and shall be completed prior to the start of work each shift, at a minimum. When changes occur throughout a task(s), the plan must be updated and communicated accordingly. Contract work performed by IC affiliated entities shall utilize *Exhibit A, Safety Task Analysis Form.*

All daily safety pre-plans must document the following aspects, at a minimum:

- All daily tasks.
- All known hazards identified.
- The controls or mitigation aspects to control the hazards identified.
- Employee(s) sign in and sign out.

The document is to be completed by the crew with open and interactive discussions on the daily tasks, hazards, and controls to be used and/or implemented.

Disciplinary Policy, Corrective Action, and Coaching

This objective is to promote improvement by addressing performance or behavior issues constructively to help employees meet company expectations, ensure consistency through corrective actions fairly and uniformly across all employees, prevent recurrence by reducing the likelihood of repeated safety, performance, or conduct issues, maintain a safe and respectful workplace, and support accountability by clearly communicating expectations and consequences.

All employees must comply with the health and safety requirements set forth herein. Failure to comply will lead to implementation of the steps that are set forth in this disciplinary program. Violations that are deemed more serious can accelerate the process, up to and including immediate termination. Corrective action from safety violations has a primary goal. It is to facilitate performance and behavior improvement, not just to serve as a punishment. When used correctly, corrective action sets forth clear standards for employees and warns of consequences for noncompliance. This corrective action helps move employees toward acceptable performance standards when appropriate steps are taken.

Coaching is the foundation of the performance improvement process. Coaching is considered "informal" corrective action. Supervisors should document the conversation with a summary and inform the employee of such.

Coaching and formal corrective action may not be required in every situation. It will be dependent on the circumstances and judgement of supervision. Formal corrective action will be documented on *Exhibit M – Coaching and Corrective Action Notification* or other means such as on the Daily Construction Reports (DCR).

Responsibilities

This policy defines the expectations and accountability for all personnel in maintaining a safe, productive, and compliant workplace.

Every employee shares responsibility for contributing to a safe workplace both for themselves and others. Each employee shall conform to the following:

- Correct any observed unsafe action or condition immediately, and report it to your supervisor or safety representative.
- Identify and address hazards before starting any task(s) and discuss with your supervisor.
- Maintain your work area, equipment, and tools in a clean and serviceable condition.
- Attend and participate in all scheduled and/or required safety meetings or training.
- Attend and participate in all task related safety pre-planning as it pertains and/or affects your scope of work.
- Always use the appropriate Personal Protective Equipment (PPE) and designated equipment for the task.

At a minimum, each Subcontractor will designate one on site and full time Foreman for every 20 employees. Once a Subcontractor has 3 Foremen, one will be designated as a non-working Foreman. A non-working Foreman means one that does not work with their tools.

At a minimum, the Foreman will be requested to:

- Ensure their employees attend jobsite orientation before that employee's start of work on the project.
- Take the lead in recognition and abatement of hazardous situations.
- Facilitate and conduct a pre-shift safety planning session with all their crew members.
- Ensure the completion of a weekly safety audit for their scope of work.
- Ensure the competent person(s) are onsite for the applicable scope of work.
- Effectively utilize and train employees in pre-planning, recognition, and remediation of hazards.
- Enforce corrective actions with their crew and their Subcontractors.

At a minimum, each Subcontractor shall designate a minimum of one full-time onsite Safety Coordinator if the subcontract value is $10 million or greater and/or the Subcontractor will have 25 employees' onsite (including Subcontractor tiers)

for 2 consecutive weeks or more. The Subcontractor Safety Coordinator must be identified before the Subcontractor begins work onsite. At a minimum, the Subcontractor must provide a Safety Coordinator who:

- Is qualified to recognize safety hazards; and
- Has the authority to take corrective action; and
- Possesses current certifications in First Aid, CPR, and AED; and
- Possesses an OSHA 30 Hour card and/or greater; and
- Has an academic degree in safety, STS-C, CHST, ASP, or CSP designation; or
- Has a minimum of 3 years prior work history as a designated Safety Coordinator, or
- Project Team along with IC Safety can appoint candidate(s) upon review.

Supervisors and Managers are ultimately responsible for the safety of both employees and work sites. They shall follow, adhere to, and enforce all company and regulatory safety policies, procedures, and requirements. These include, but are not limited to:

- Ensuring all safety procedures, regulations, and requirements are understood and followed.
- Ensuring before a Subcontractor begins work that the following safety submittals have been received:
    - Blank copy of Subcontractors daily pre-task planning tool.
    - Identification of the Competent Person(s) for the scope of work via *Exhibit K - Competent Person Form.*
        - Successful completion of this *Exhibit K – Competent Person Form* includes acknowledgement of *Exhibit H – Site Specific Safety Program – Addendums and Revisions.*
            - The competent person shall be onsite anytime this work is in progress for their crew(s). This includes any Subcontractors of theirs as well.
- Ensuring all contract specific safety procedures and requirements are understood and followed.
- Ensuring any unsafe action or condition is corrected immediately.
- Ensuring injuries and accidents are reported and investigated.
- Ensuring all documentation and required safety meetings are properly completed and/or attended.
- Ensuring employees and managers attend all required training.
- Assessing and controlling workplace hazards through hazard management.
- Conducting and documenting effective and thorough weekly safety inspections for the work area(s).
- Never placing anyone in an unsafe situation, condition, or environment.

Accident Reporting

Accident reporting ensures all incidents and near-misses are promptly documented and communicated, enabling timely response, proper care, root cause analysis, and implementation of corrective actions. This process supports regulatory compliance, continuous safety improvement, and the prevention of future workplace injuries.

Employees are required to immediately report any incident (i.e., injury, illness, auto accident, property loss, equipment damage, environmental impact, near miss, etc.) regardless of the perceived severity.

- For reporting and responding to incidents on IC Projects, refer to *Exhibit C, Incident Response and Reporting Flowchart.* If the incident or accident involves an employee of IC, *Exhibit D, Incident Report* shall be completed and submitted to the IC Safety Department.
- In the event of a crisis or emergency onsite (Category III), reference *Exhibit P, Crisis Management Plan and Emergency Action Plan.*

- The complete incident report shall be provided to the IC Safety Department within 24 hours, but no later than 48 hours of the incident. If additional time is needed and warranted, notice shall be provided to the IC Safety Department in advance with continuous updates on status and completion.

Asbestos Awareness

Asbestos awareness ensures all employees recognize the hazards associated with asbestos-containing materials, understand safe handling practices, and know how to respond appropriately to potential exposure and conforms to OSHA and all applicable regulatory standards. This awareness helps prevent health risks, ensures regulatory compliance, and promotes a safe work environment.

The four classes of asbestos work are defined as follows:

- Class I Asbestos Work: Activities involving the removal of surfacing ACM and PACM.
- Class II Asbestos Work: Activities involving the removal of ACM which is not TSI or surfacing material. Class III Asbestos Work: Repair and maintenance operations where ACM and/or PACM are likely to be disturbed.
- Class IV Asbestos Work: Maintenance and custodial activities during which employees contact but do not disturb ACM and activities to clean up dust, waste, and debris resulting from Class I, II, and III activities

This section regulates asbestos exposures in all work as defined by OSHA.

- Any employer performing work requiring the establishment of a regulated area shall inform other employers on the site of the nature of the employer's work with asbestos, of the existence of and requirements pertaining to regulated areas, as well as the measures taken to ensure that employees of such other employers are not exposed to asbestos.
- Asbestos hazards shall be abated by the Subcontractor who created or controls the source of asbestos contamination.
- All employers of employees exposed to asbestos hazards shall comply with applicable protective provisions to protect their employees.
- All employers of employees working adjacent to regulated areas established by another employer shall take steps on a daily basis to ascertain the integrity of the enclosure and/or the effectiveness of the control method.
- The Subcontractor performing asbestos related tasks shall be certified for such work per federal and state requirements and shall have a program in place that complies with the OSHA standards.

Carbon Monoxide (CO) Exposure Prevention

The objective of Carbon Monoxide (CO) awareness is to ensure all employees understand the risks of carbon monoxide exposure, recognize its sources and symptoms, and follow proper preventive and emergency procedures. This knowledge helps protect health, prevent accidents, and maintain a safe work environment.

CO is a highly-toxic, flammable, non-irritating, tasteless, colorless, odorless gas that is slightly lighter than air. CO interferes with the oxygen-carrying capacity of blood. CO is non-irritating and can overcome people without warning. Some of the common symptoms of carbon monoxide poisoning are shortness of breath, headache, dizziness, muscular weakness and nausea.

- Testing Requirements - Use of any device that discharges the products of combustion into a work area where an employee exposure is possible, requires testing as defined below:

- Continuously monitor the work area to determine the concentration of carbon monoxide including, but not limited to, date, time, location, and reading result. Monitoring shall be conducted with a UL approved monitoring device.
- Monitor several different points within the area at the working/breathing heights of an employee.
- Maintain a record of these tests.
- Remove the employees from the area when the concentration of carbon monoxide reaches 20 PPM. Supplemental ventilation and reduction or elimination of the source shall be provided to reduce the concentration below 20 PPM before the employees are allowed to resume work in the area.
    - Continuous monitoring required when the concentration of carbon monoxide reaches a steady concentration of greater than 20 PPM in ambient air.

- Internal Combustion Engine Equipment
    - Prevent CO exposure by using tools or vehicles powered by electricity or compressed air.
    - Utilize engineering controls including exhaust scrubbers on equipment and the use of non-CO type equipment.
    - Never use equipment, vehicles, or machinery with internal combustion engines such as generators, cars, trucks, etc. indoors or in enclosed or partially enclosed spaces such as garages, crawl spaces, tunnels and basements without proper controls, ventilation, or air cleaners.
    - Do not use internal combustion engines outdoors if placed near doors, windows, vents air handlers etc. which could allow CO to enter and build up in occupied spaces.

Compressed Gas Cylinders

The objective of this policy is to ensure the safe handling, storage, and use of compressed gas cylinders to protect employees, property, and the work environment.

All cylinders shall be utilized to the requirements and recommendations of the manufacturer. All employees are required to treat cylinders with caution, follow manufacturers and regulatory guidelines. This includes, at minimum, the following:

- Proper Storage: Cylinders must be stored upright, secured, and away from heat sources or flammable materials.
- Safe Handling: Employees must use appropriate equipment and personal protective equipment (PPE) when moving or connecting cylinders. Unless cylinders are firmly secured on a designated and proper carrier intended for this purpose, regulators shall be removed, and valve protection caps put in place before cylinders are moved.
- Inspection and Maintenance: Cylinders and related equipment must be regularly inspected for damage, leaks, or other hazards before use.
- Training and Awareness: Only trained personnel are permitted to handle compressed gas cylinders, and all employees must be aware of associated risks, including flammability, pressure hazards, and asphyxiation.
- Emergency Preparedness: Subcontractor must have a plan in place for responding to leaks, ruptures, or other incidents, including evacuation and notification protocols.
- General: Storage of propane (LPG) must be outside of buildings and shall be located from the nearest building (office trailer, tool trailers, and any other temporary or permanent structure) or group of buildings in accordance with OSHA.

Concrete Safety

The objective of this policy is to ensure the safe handling, placement, and finishing of concrete to protect employees from hazards through the implementation of personal protective equipment (PPE), safe work practices, training, and awareness of potential risks.

All employees must be properly trained in the equipment they use and/or operate for the placement of concrete. All pertinent safety supplies, equipment, response, and first aid measures must be in the immediate area of the work and provided by the Subcontractor performing the concrete placement scope of work.

No construction loads shall be placed on a concrete structure, or portion of a concrete structure, unless information is received from a person who is qualified in structural design, that the structure or portion of the structure is capable of supporting the loads. No employees shall be permitted to work under concrete buckets while buckets are being elevated or lowered into position. Elevated concrete buckets shall be routed so that no team member, or the fewest number of team members, is exposed to the hazards associated with falling objects. All protruding reinforcing steel (including form stakes and similar), onto and into which employees could fall, shall be guarded to eliminate the hazard of impalement.

Cast In Place Concrete

- Formwork on multi-floor structures must be secured from wind displacement with wind clips and/or tethering as needed.
- All formwork and shoring systems shall be able to support imposed loads.
- All cutting, drilling, penetrating or coring a post-tensioned slab must be done with written direction from the structural engineer of record or a registered professional engineer.
- Handles on bull floats, used where they may contact energized electrical conductors, shall be of nonconductive material, or insulated with a nonconductive sheath.
- Do not expose employees to hazards associated with working in wet concrete, without proper equipment.

Formwork Removal

- Forms and shores (except those used for slabs on grade and slip forms) shall not be removed until the concrete has gained sufficient strength to support its weight and superimposed loads.

Pre-Cast Requirements

- Planks will not be set until the load bearing walls/columns have attained required structural strength.
- Employees shall not be permitted to work above vertically protruding reinforcing steel unless protected to eliminate the hazard of impalement and falls.
- Reinforcing steel for walks, tiers, columns and similar vertical structures shall be guyed and supported per the design criteria and specifications.

Post-Tensioned Concrete

- The area for post tensioning shall be barricaded with a hard barricade at a distance sufficient for the hazard.
    - Only employees involved in the post tensioning process shall be permitted inside the post tensioning zone.
    - Employees involved in post tensioning shall stand clear of the stress zone and maintain a safe distance.
- Ensure the strand is perpendicular to the anchor and that the anchor is parallel to the concrete face. Do not stress if out of alignment.
- Ensure the anchor is clean and free of dirt and debris.

- A post tensioned slab cannot be cored, drilled or saw cut without written direction from the structural engineer of record or a registered professional engineer.
- The floor shall be surveyed using ground penetrating radar to locate strands before the concrete deck is cored, chipped, drilled, cut or disturbed in any fashion.
- The de-tensioning process should be at the direction of the structural engineer of record or a registered professional engineer.
- Ensure the structural integrity of the slab has been restored at the direction of the structural engineer of record or a registered professional engineer.

Confined Spaces

The objective is to ensure the safety of all personnel who enter or work near confined spaces. It focuses on identifying hazards, implementing proper entry procedures, using appropriate personal protective equipment (PPE), monitoring atmospheric conditions, and emergency response.

Key Definitions

- Attendant means an individual stationed outside one or more permit spaces who assesses the status of authorized entrants and who must perform the duties specified in CFR 1926.1209

- Authorized Entrant means an employee who is authorized by the entry supervisor to enter a permit space. The entry employer must ensure that all authorized entrants must adhere to the duties specified in CFR 1926.1208

- Controlling Contractor is the employer that has overall responsibility for construction at the worksite.

- Entry means the action by which any part of a person passes through an opening into a permit–required confined space. Entry includes ensuing work activities in that space and is considered to have occurred as soon as any part of the entrant's body breaks the plane of an opening into the space, whether or not such action is intentional, or any work activities are actually performed in the space.
    - All entries into confined spaces must be coordinated with IC prior to work being performed. *Exhibit O, Confined Space Checklist* shall be utilized for IC employees.

- Entry Employer means any employer who decides that an employee it directs will enter a permit space.

- Entry Permit means the written or printed document that is provided by the employer who designated the space a permit space to allow and control entry into a permit space and that contains the information specified in CFR 1926.1206

- Entry Supervisor means the qualified person (such as the employer, foreman, or crew chief) responsible for determining if acceptable entry conditions are present at a permit space where entry is planned, for authorizing entry and overseeing entry operations, and for terminating entry as required by this standard. The entry supervisor must adhere to the duties specified in CFR 1926.1210.

Confined Space is a space that:

1. Is large enough and so configured that an employee can bodily enter it; and
2. Has limited or restricted means for entry and exit; and
3. Is not designed for continuous employee occupancy.

Permit-required Confined Space means a confined space that has one or more of the following characteristics:

1. Contains or has a potential to contain a hazardous atmosphere;
2. Contains a material that has the potential for engulfing an entrant;
3. Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross section; or
4. Contains any other recognized serious safety or health hazard.

Non-Permit Confined Space means a confined space that meets the definition of a confined space but does not meet the requirements for a permit-required confined space.

No employee may enter a confined space without:

- Required Training;
- Having the space identified as either Non-Permit or Permit Required Confined Space; and
- Meeting all the requirements of OSHA.

Before beginning work, each Subcontractor must ensure their designated confined space competent person identifies each space, evaluates the space to determine its classification (permit-required, alternative entry or non-permit-required), and has appropriate pre-planning documentation including a written confined space program, employee training records, equipment type and service records, rescue provisions, communications, and permitting as applicable.

Atmospheric Testing - The air must be monitored to determine whether dangerous air contamination—an atmosphere presenting a potential for death, disablement, injury, or acute or delayed illness—exists. This may result from one or more of the following causes:

A. Oxygen level less than 19.5% by volume (oxygen deficient) or greater than 23.0 % by volume.
B. A flammable gas, vapor or mist in excess of 10% of its lower explosive or lower flammable limit.
C. Toxic, corrosive or asphyxiating substance(s) above the permissible exposure or ceiling level.
D. An airborne combustible particulate, present in excess of 10% of its minimum explosive concentration.
E. Any condition or air contaminate defined as immediately dangerous to life or health (IDLH).

As a minimum, monitoring must include items (A), (B) and (C) above. Monitoring for any toxic substances that might be reasonably expected to exist or develop must also be performed. All testing must be performed by an Entry Supervisor, or an employee trained in using the approved equipment. All equipment must be used and calibrated according to manufacturers' instructions, and all testing results must be recorded on the confined space entry permit. The serial number of the equipment used shall also be recorded on the permit.

Cranes and Lifting Equipment

This policy is to ensure that all crane and lifting operations are performed safely, efficiently, and in compliance with regulatory standards. It establishes the company's commitment to preventing incidents through proper planning, qualified operation, equipment integrity, and clear communication.

IC must be notified a minimum of 48 hours in advance of any crane mobilization to the project. *Exhibit B, Crane Utilization Checklist* will be verified and signed off by the Subcontractor prior to any crane work being performed on the project. *Exhibit B, Crane Utilization Checklist* must be resubmitted when the following occurs:

- Change occurs with the Operator.
- Crane, type of crane, or crane configuration is modified and/or changes.
- Task, scope, and/or dynamic changes to the operation.
- If a piece of equipment used for material handling has a counterweight.
- At the discretion of the IC Project Team or IC Safety Team.

At the discretion of the IC Supervisor, *Exhibit B, Crane Utilization Checklist* may be required of a boom truck. Depending on various conditions such as, but not limited to:

- Type of material being handled.
- Duration of delivery.
- Complexity of delivery.
- Subcontractors risk to other trades.
- Subcontractor's prior unsafe actions.

A "critical lift" is a crane that involves and/or includes the following:

- Exceeds 75 percent of the rated capacity of the crane or derrick; or
- Requires the use of more than one crane or derrick.
- Is used to hoist personnel, in conjunction with a "man basket."
- Any lift may be deemed a "critical lift" at the discretion of the IC Project Team (i.e. value of material/equipment hoisted, special rigging considerations, or hoisting over occupied buildings).

All cranes must have a current annual inspection free from deficiencies and/or recommendations. When cranes are erected on site, barring jib installation and counterweight placement, a third-party inspection must be performed before the onset of crane operations begin. Capacity, duration, and size will not supersede this requirement. Costs and schedule impacts associated with this requirement are the sole responsibility of the Subcontractor using the crane and/or crane services. The IC Project Team reserves the right to request an annual inspection to be completed or provided by a third party at any time and at the expense of the Subcontractor, regardless of the requirements noted above.

It is the responsibility of the Subcontractor to make investigations and to exercise due diligence in finding and marking underground structures, voids, or inconsistencies before erecting a crane on that surface. All equipment must have the operator's manual in it. All cranes must be equipped with an anemometer (wind gauge) and must be operated only by properly certified operators per OSHA. If not equipped with a wind gauge, one must be available at the site.

Prior to placement of any cranes, the Subcontractor shall reference the FAA notification website to determine if an FAA Permit is required, along with the need for flags and/or lights. The direct and indirect impacts of this process will be the responsibility of the Subcontractor contracting and/or using in house, the crane.

The Qualified Operator must not leave the controls or seat while the load is suspended and should not have any loose garments or connections (i.e., keys, lanyards), not otherwise intended for operation, on their person.

All rigging must be inspected prior to each use. Damaged, worn, or otherwise uncompliant rigging must be tagged and removed from service immediately. All custom-made lifting devices, such as lifting beams, must be designed by a qualified engineer prior to their use. If any part of the equipment, load line or load (including rigging and lifting

accessories), is assembled, disassembled, and/or operated could get closer than 50 feet to a power line, then verify one of the following requirements is met:

- Conform to OSHA 1926.1408, Table A – Minimum Clearance Distances.
    - Verify the line's voltage and the minimum clearance distance, and ensure no part of the equipment, load line, or load (including rigging and lifting accessories), could get closer than the minimum clearance distance.
- The utility owner/operator confirms that the power line has been de-energized and visibly grounded at the worksite.

Demolition

This policy is designed to ensure that all demolition activities are planned and executed safely, with full consideration of structural stability, environmental hazards, and worker protection. It emphasizes hazard assessment, controlled methods, proper equipment use, and compliance with regulatory requirements.

Prior to demolition or selective demolition, a Phase 1 and then, if necessary, a Phase 2 Environmental Site Assessment shall be procured from the Owner of the property / building when applicable and required per local, state, and federal regulations. When a Phase 1 identifies a recognized environmental condition or the potential for soil contamination, a Phase 2 must be provided. In the event a Phase 2 is required, a Clean Letter shall be produced to document the proper abatement and mitigation of all hazardous conditions noted in the Phase 2 have been properly mitigated.

Ensure conformance with applicable local, state and federal regulatory requirements (i.e., permits and approvals) prior to the start of demolition operations. Employees in, around, or directly involved with the task must be familiar with OSHA CFR1926.850, Subpart T, Demolition. Prior to starting demolition activities on the property or project, the following preparatory obligations must take place.

- An engineering survey shall be made by a competent person of the structure to determine the condition of the framing, floors, and walls. This survey must be documented.
- Assess the entire structure for any potential areas of unplanned collapse.
- Verification that adjacent structures pose no harm to employees working in the demolition area. If there is a hazard that exists, then it must be mitigated before proceeding to work.
- It shall also be determined if any type of Hazardous chemicals, gases, explosives, flammable materials, or similarly dangerous substances have been used in any pipes, tanks, or other equipment on the property. When the presence of any such substances is apparent or suspected, testing and purging shall be performed, and the hazard eliminated before demolition is started.
- All electric, gas, water, steam, sewer, and other service lines shall be shut off, capped, or otherwise controlled, outside the building line before demolition work is started. In each case, any utility company that is involved shall be notified in advance.
- If it is necessary to maintain any power, water or other utilities during demolition, such lines shall be temporarily relocated, if possible, and protected.
    - In select demolition, if utilities cannot be shut off, capped, or otherwise controlled, a site-specific control plan will be developed and implemented to identify what utilities are de-energized or that will remain active system must be in place to identify what utilities are de-energized or active.
    - Before the start of demolition work all areas of Hazardous energy that are not able to be eliminated must be properly isolated.

The area(s) of demolition must be clearly identified and communicated. Effective use of barricades and/or warning signs shall be used to keep unauthorized personnel out of delineated hazardous areas. Supervision must be aware of all authorized individuals and the activities they are performing inside the demolition area. When employees are required to work within a structure to be demolished which has been damaged by fire, flood, explosion, or other cause, the walls or floor shall be shored or braced. Employee entrances to multistory structures being demolished shall be completely protected.

- Only those stairways, passageways, and ladders, designated as means of access to the structure of a building, shall be used.
- All stairs, passageways, ladders and incidental equipment, shall be periodically inspected and maintained in a clean safe condition. All egress and ingress routes shall be properly illuminated by either natural or artificial means.
- When debris is dropped through holes in the floor without the use of chutes, the area onto which the material is dropped shall be completely enclosed with barricades.
    - Barricades and signs, warning of the hazard of falling materials, shall be installed and posted at each level. Removal shall not be permitted in this lower area until debris handling ceases above.
- All floor openings not used as material drops, shall be covered over with material substantial enough to support the weight of any load that may be imposed. Such material shall be properly secured to prevent its accidental movement.
- When upper floors are demolished, or debris is dropped through holes in the floor without the use of a chute, the area onto which the material is dropped shall be completely isolated by use of barricades, warning lines and signage—not less than six feet back from the projected edge of the above opening. Material should not be allowed to accumulate to the degree that it can potentially exceed floor load limits. Removal of the material may not begin until all activity on the upper floors has stopped or been completed.
- All openings not used as material drops shall be covered over with material substantial enough to support the weight of any load that may be imposed. Such covers shall be secured and clearly marked with the word "HOLE."

Chutes

- No material shall be dropped to any point lying outside the exterior walls of the structure unless the area is effectively protected.
- Whenever materials are dropped more than 20 feet to any point lying outside the exterior walls of the building, an Enclosed Chute of wood, or equivalent material shall be used. At all stories below the top floor, such openings shall be kept closed when not in use.
- When operations are not in progress, the area surrounding the discharge end of a chute shall be securely closed off.
- Chutes shall be designed and constructed of such strength as to eliminate failure due to impact of materials or debris loaded therein.

Storage

- Demolition waste material shall be stored and staged in a safe manner, not blocking ingress and egress paths, and disposed of properly throughout the shift.
- The storage of waste material and debris on any floor shall not exceed the allowable floor loads.
- In buildings having wooden floor construction, the flooring boards may be removed from not more than one floor above grade to provide storage space for debris, provided falling material is not permitted to endanger the stability of the structure.
- When wood floor beams serve to brace interior walls or freestanding exterior walls, such beams shall be left in place until other equivalent support can be installed to replace them.

- Storage space into which material is dumped shall be blocked off, except for openings necessary for the removal of material. Such openings shall be kept closed when material is not being removed.

Mechanical Demolition

- All equipment exposed to flying and falling debris during the course of conducting demolition work will have operator cab protection systems. Excavators that will be conducting demolition work will be equipped with a full demolition cage. This cage will provide protection on all sides of the cab, including the top. Equipment used to prepare concrete will have cage protection for the front windshield at a minimum. All demolition equipment will observe the minimum clearance as per OSHA standards and regulations.
- No employees shall be permitted in any area which can be adversely affected by demolition operations. Only those employees necessary for the performance of the operations shall be permitted in this area (s). Only those employees necessary for the performance of the operations shall be permitted in this area(s).
- During demolition, continuing inspections by a competent person shall be made as the work progresses to detect Hazards resulting from weakened or deteriorated floors, or walls, or loosened material.

Drones and Unmanned Aircraft Systems (UAS)

In support of safe and responsible drone operations, this policy establishes guidelines to ensure that all UAS activities are conducted in compliance with regulatory requirements and company standards. It focuses on operator training, flight planning, risk assessment, and maintaining safe distances from people, property, and equipment.

Unmanned Aircraft Systems (UAS)/Drones must be operated in a manner that meets or exceeds all known federal, state & local municipality, Drone Safety Council, Unmanned Safety Institute, FAA & DOT standards & regulations. The most restrictive guidelines take precedence. Additionally, UAS may only be operated on Projects if approved in advance by the Project Owner and if the Project Owner does not give such approval, Subcontractor agrees that it will not use UAS on or near the Project site.

Assuming the Project Owner approves the use, UAS UAS/Drones must not be operated on an IC project and/or property without ensuring the following:

- Coordinate with IC Safety Team a minimum of 72 hours in advance.
    - Company/Entity requesting to operate a UAS/Drone must carry drone insurance policy (minimum of $500,000 coverage).
        - The Project Owner of the property (if different), and IC must be named as additional insureds, as well as any additional parties required to be named as additional insureds pursuant to the Subcontract Agreement.
    - Operators must be licensed per FAA requirements.
        - The operator and/or entity must coordinate and conform to the use of other drones that might be in the same area being operated by other entities, FAA rules governing use of the drone under this particular scenario, city or state requirements, privacy issues, insurance requirements, flight plans, safety issues and mitigation plan, operating times, date the drone will be in use, protection of the public and workers, neighborhood concerns, type of drone being used, and overall compliance.
    - UAS/Drone must be registered per FAA requirements.
    - At least 48 hours prior to UAS/Drone use, Subcontractor is required to provide notice, in writing, to the property owner and any other stakeholders necessary of the dates / times of, and intended plan for, UAS/Drone use and safety precautions to be taken. Stakeholders may include residents in neighboring buildings that may have privacy concerns of a camera-mounted on a UAS/Drone.
- UAS/Drones cannot travel at over 100 mph.

- UAS/Drones cannot fly higher than 400 feet above ground, except within 400 feet of a structure (and then no more than 400 feet above the structure's highest point).
- Maintain at least 100 feet between the UAS/Drone and people, vehicles, roadways (unless closed), buildings and electrical lines and power stations.
- UAS/Drones may not be operated within 5 miles of an airport or where manned aircraft are operated (hospital helipad).

Any incidents using drones that the operator has been involved in must be reported within no more than twelve (12) hours to the IC project team and a written report of the incident, including a root cause analysis, and time frame for repair/replacement of any damage caused as a result of the incident, must be provided to the IC project team within three (3) business days.

Electrical

To protect employees from electrical hazards, this policy establishes the requirements for safe work practices when working with or around electrical systems and equipment. All electrical work, installation and capacities shall be in accordance with the pertinent provisions of the National Electrical Code, ANSI, and OSHA Standards.

Only qualified personnel are authorized to perform work, service, or maintenance on energized electrical parts or systems. Safe work practices will be employed to prevent electric shock or other injuries resulting from either direct or indirect electrical contacts when work is performed near or on equipment or circuits that are or may be energized.

All electrical conductors and equipment will be acceptable, certified, listed, labeled, or otherwise determined to be safe by a qualified testing laboratory. Electrical equipment will be free from recognized hazards that are likely to cause death or serious physical harm to employees. Electrical equipment will not be used unless the manufacturer's name, trademark, or other descriptive marking is placed on the equipment providing voltage, current, wattage, or other ratings, as necessary. Electrical machines should be disconnected (utilizing lock out-tag out per OSHA requirements) before cleaning, adjusting, or applying flammable solutions.

Barriers or other means of guarding will be provided to ensure that workspace for electrical equipment will not be used as a passageway during periods when energized parts of electrical equipment are exposed.

Temporary electrical circuits (with the exception of temporary lighting) must have ground fault circuit interrupter (GFCI) protection and must be a UL approved assembly. Light bulbs used for illumination must be protected from breakage and maintained continuously throughout the duration of their intended use. GFCI protection must be used for all portable electrical tools. All extension cords, tools, and GFCI protection shall be inspected for defects prior to use. All portable tools, cords, and appurtenances must conform to manufacturer requirements.

Extension cords should be rated for hard or extra hard usage and be a minimum 12-gauge wire. Extension cords should not be suspended with staples, hung from nails, or suspended by wire; use non-conductive means only. All cords, hoses, and leads must be stored and put away safely, immediately after use.

Entrances to rooms and other guarded locations containing live parts will be marked with conspicuous warning signs forbidding unqualified persons to enter.

Energized Work: ensure the safety of all personnel when performing energized work on electrical systems and equipment, to prevent electrical shock, arc flash, and other related hazards. Only Authorized Qualified Electrical

Workers shall work on or near energized electrical equipment within the limited approach boundaries and minimum approach boundaries set forth by NFPA 70E, OSHA, and NEC. As a general rule, work on electrical equipment should be performed in a de-energized state. Energized work (50 Volts or greater) may be permitted where the qualified person can demonstrate that de-energizing introduces additional hazards, increased risk, or is infeasible. Examples of additional hazards or increased risk include, but are not limited to, interruption of life-support equipment, deactivation of emergency alarm systems, and shutdown of hazardous location ventilation equipment.

- *EXHIBIT Q – Energized Work Checklist* must be reviewed a minimum of five business days before commencement of the proposed energized work.

Equipment and employees must stay a safe distance away from all overhead power lines, following all OSHA requirements.

- Any project work where there are overhead lines present requires adequate identification and communication as to where the lines are located.

Energized electrical conductors and circuit parts that operate at less than 50 volts shall not be required to be deenergized when the following is considered and implemented:

- The capacity of the source and any overcurrent protection between the worker are considered.
- It is determined that there will be no increased exposure to electrical burns or to explosion due to electric arcs.
- A qualified person is provided with and uses appropriate safe work practices and PPE (sufficient protection for potential exposure) under any of the following conditions:
  - Testing or troubleshooting.
  - Thermography, ultrasound or visual inspections if the minimum (restricted) approach boundary is not crossed.
  - Access to and egress from an area with energized electrical equipment if no electrical work is performed and the minimum (restricted) approach boundary is not crossed.
  - General housekeeping and miscellaneous non-electrical tasks if the minimum (restricted) approach boundary is not crossed.

Fall Protection and Prevention

Recognizing that falls are a leading cause of workplace injuries, this policy establishes the company's commitment to eliminating fall hazards and protecting employees from falls. It focuses on hazard assessment, proper use of fall protection systems, training, and adherence to regulatory requirements.

All employees working at or above a 6 feet leading edge condition, fall protection or prevention methods shall be in place, requiring 100 percent fall protection or prevention. This applies to all situations, tasks, and scopes of work. If fall protection is deemed infeasible, a specific plan must be established, reviewed by the competent person, and presented to the IC Safety Team prior to proceeding.

Minimum specifications for fall protection systems include:

- Guardrail Systems.
  - Wooden Guardrail Systems
    - Guardrails cannot be made of metal studs.
    - Wood guard rails must not have any protruding hazards.

- Top rail shall have a vertical height of 42 inches, +/- 3 inches above the working/walking surface and be capable of withstanding, without failure, a force of at least 200 pounds.
- Mid-rail must be installed between the top edge of the guardrail system and the working/walking surface but must be approximately 21 inches high and be capable of withstanding, without failure, a force of at least 150 pounds.
- A 3 ½ inch toe board or similar system will be required where employees are exposed to falling objects below.

- Steel Cable Protective System.
  - Top cable shall have a vertical height of 42 inches, +/- 3 inches above the working/walking surface and be capable of withstanding, without failure, a force of at least 200 pounds.
    - Top cable must not deflect below 39 inches or above 45 inches.
    - The guardrail surface must be surfaced, so as to prevent lacerations or puncture wounds, as well as prevent clothing from snagging.
    - The top cable must be flagged with highly visible material at a minimum of 6-foot intervals.
  - Mid-rail must be installed between the top edge of the guardrail system and the working/walking surface but must be at least 21 inches high and be capable of withstanding, without failure, a force of at least 150 pounds.
  - Toe board – A 3 ½ inch toe board or similar system will be required where employees are exposed to falling objects from above working/walking surfaces.
  - Perimeter fall protection systems must meet or exceed all requirements set forth by local, state, or federal requirements.
  - Stanchions must be rated as per the OSHA standards for perimeter protection requirements.
  - Minimum ¼ inch cable flagged every 6 feet, with top rail at 42 inches (+/-3 inches) above finished floor.
  - Maintain a deflection of less than 3 inches with posts located at intervals to maintain cable deflection requirements, if required.
  - Install turnbuckles at regular intervals, at least one per change of direction and length of cable. Not to exceed four 4 bays or 120 feet, whichever is more stringent.
  - Install a minimum of three cable clamps at the end of each run.
  - Posts or points of attachment to be at 42 (+/-3) inches above top of slab to compensate for over-pours, deflections or other discrepancies, which may lead the cable to be lower than 39 inches at any time.
  - Do not use wire rope cable systems as anchorage points unless designed with tabulated data from a registered professional engineer and submitted to thew IC Project Team for review.

- Positioning Devices.
  - Positioning devices shall be secured to an anchorage capable of supporting at least twice the potential impact load of an employee's fall or 3,000 pounds, whichever is greater.
  - Positioning device use shall meet all OSHA requirements.

- Warning Line Systems
  - A Warning Line System is designed to warn employees that they are approaching an unguarded edge during roofing operations.
  - Warning line systems are only permitted on low sloped roofs.

- When mechanical equipment is not being used, the warning line shall be erected not less than 6 feet from the roof edge.
    - When mechanical equipment is being used, the warning line shall be erected not less than 6 feet from the roof edge which is parallel to the direction of mechanical equipment operation, and not less than 15 feet from the roof edge which is perpendicular to the direction of mechanical equipment operation.
        - For other trades not performing roofing work, the Warning lines must be placed 15 feet from the roof edge.
- No employee shall be allowed in the area between a roof edge and a warning line unless the employee is performing roofing work in that area.
- A Warning Line must be marked with highly visible flags every 6 feet to call attention to its presence and must comply with all OSHA requirements.
- All stanchions or vertical system components must be secured from tipping.

- Controlled Access Zone (CAZ)
    - When used to control access to areas where leading edge and other operations are taking place the controlled access zone shall be defined by a control line or by any other means that restricts access.
    - When control lines are used, they shall be erected not less than 6 feet nor more than 25 feet from the unprotected or leading edge.
    - When used to control access to areas where overhand bricklaying and related work are taking place:
        - The controlled access zone shall be defined by a control line erected not less than 10 feet nor more than 15 feet from the working edge.
        - A Control Line must be marked with highly visible flags every 6 feet to call attention to its presence and must comply with all OSHA requirements.

- Holes, Gaps, and Voids– A hole, gap, or void in roofs, floors, and other walking/working surfaces that is two inches or more in its least dimension must be protected with covers to prevent tripping and/or falling into (including debris and material). Covers shall meet the following requirements, at a minimum:
    - Covers located in roadways and vehicular aisles shall be capable of supporting, without failure, at least twice the maximum axle load of the largest vehicle expected to cross over the cover.
    - All other covers shall be capable of supporting, without failure, at least twice the weight of employees, equipment, and materials that may be imposed on the cover at any one time.
    - All covers shall be secured when installed to prevent accidental displacement by the wind, equipment, or employees.
    - All covers shall be color coded, or they shall be marked with the word "HOLE" or "COVER" to provide warning of the hazard.

- Fall Restraint System - A Fall Restraint System is a control system designed to prevent the possibility of a fall. The system prevents an employee from reaching the unguarded edge of a working platform.
    - Fall restraint systems must have the capacity to withstand at least 3,000 pounds of force or twice the maximum expected force that is needed to restrain the person from exposure to the fall hazard.

- Personal Fall Arrest Systems include:
    - All aspects of a Personal Fall Arrest System must comply with OSHA requirements and the manufacturer's specifications.
    - Anchors

        - Competent Persons shall inspect and approve anchorage connections.
        - Engineered anchorage points must be capable of supporting at least 3,600 pounds per employee.
        - Anchorage points must have sufficient strength to withstand twice the potential energy of an employee free-falling a distance of 6 feet, or the free-fall distance permitted by the system.
        - Manufactured anchorage points must be installed per the manufacturers' instruction.
    - Body Wear
        - Only a full body harness will be used as a part of a Personal Fall Arrest System.
    - Connection Devices
        - Connectors must contain double-locking and self-closing snap hooks.
        - Lanyards must not be snapped together to increase length.
        - Self-Retracting Lanyards (SRL), when installed away from the allowable reach, should utilize a tag line in order to eliminate damage to internal components of the equipment.
        - D-ring extensions shall not be used while performing leading edge (LE) work.
- Rescue Plan – Whenever an employee is exposed to an unguarded fall hazard, there must be a rescue plan in place and crews must be trained in its procedures. Elevated work areas with guardrails do not require a rescue plan.

Fire Prevention and Hot Work

To reduce the risk of fire-related incidents, this policy outlines the requirements for safe hot work operations and overall fire prevention practices. It emphasizes hazard assessment, the use of permits, maintaining fire watches, and ensuring that appropriate fire extinguishing equipment is readily available.

Fire hazard conditions constantly change. Accumulation of flammable materials and liquids appear at new locations frequently. In addition, many ignition sources are present. Consequently, the potential for loss due to fire is substantial.

- Considerations for fire safety include:
    - Proper site preparation.
    - Availability of private and public fire protection.
    - Safe installation and protection of temporary buildings and other structures.
    - Adequate project fire protection and prevention means.
    - Minimizing inherent construction fire hazards.
    - Installation of permanent safeguards as construction progresses.
    - Schedule routine local / jurisdictional fire department visits (when applicable).

A fire extinguisher rated not less than 10 lb. ABC shall be provided for every 3,000 square feet of the protected building area or major fraction thereof. Travel distance from any point of the protected area to the nearest fire extinguisher shall not exceed 100 feet. One or more fire extinguishers rated not less than 10 lb. ABC shall be provided on each floor. In multi-story buildings, at least one fire extinguisher shall be located adjacent to each stairway. Utilize *IC Fire Extinguisher Order Form* to order and replace fire extinguishers.

Tarpaulins and temporary protection shall be of proper fire rated material. Recommended practices and standards of the National Fire Protection Association (NFPA) and other applicable regulations and site specific requirements shall be followed.

Housekeeping

- Continuous clean-up of scrap material, sawdust, rags, oil, paint, grease, flammable solvents and other residue of construction operations must be performed.
- Areas beneath trailers and within 10 feet of buildings should be free of the accumulation of debris, dried vegetation or any other combustibles.
- All rags, waste, etc., soiled by combustible or flammable materials shall be placed in tightly closed metal containers for proper disposal.
    - Ensure SDS sheets are referenced for proper storage, use, maintenance, and disposal.

Storage and Handling

- Only approved containers and portable tanks shall be used for storage and handling of flammable liquids.
- Flammable or combustible liquids shall not be stored in areas used for exits, stairways or areas normally used for the passage of people or equipment.
- Areas where combustibles are stored, processed, or used should not contain heat sources, or if heating is necessary, the materials should be located to prevent overheating. Areas must be properly ventilated.
- Suitable warning and "No Smoking" signs shall be posted in all storage, refueling and service areas containing flammable or combustible liquids or gases. Smoking or the use of open flames within 50 feet of these areas is prohibited.
- On-site fuel containment shall be double walled or have secondary containment. Containers shall be protected from accident contact using jersey barriers or similar physical barricade.
- Flammable liquids and solids must be stored and maintained according to all local and federal jurisdictional requirements.
- When curbs or dikes are used, provisions shall be made for draining off accumulations of ground or rainwater, or spills of flammable liquids.

Outdoor Portable Tank Storage:

- Tanks must be stored and maintained according to all local and federal jurisdictional requirements.
- Within 200 feet of each portable tank, there shall be a 12-foot-wide access way to permit approach of fire control apparatus.
- Storage areas shall be kept free of weeds, debris, and other combustible material not necessary for storage.

Temporary Heating Devices

- Temporary heating devices shall maintain a safe distance from flammable and combustible material and debris. Proper ventilation, fire extinguisher location, storage, and maintenance shall be followed at all times, including fuels.
- Close surveillance - Salamanders and similar open flame heaters without an automatic shutoff device shall be always attended to.

Welding and Cutting - Particular care must be taken when welding or cutting. Welding areas will be set up for work that can be done away from building areas when possible. Whenever practical, all welding and cutting operations shall be shielded by noncombustible or flameproof screens.

Hot Work - any activity that involves burning, welding, cutting, brazing, soldering, grinding, or spark / heat producing task that can create an ignition source.

- *Exhibit E, Hot Work Permit* must be obtained prior to work that produces sparks, flames, or heated surfaces and is active for a maximum of one working shift.

- *Exhibit E, Hot Work Permit* shall be complied with to the fullest extent.
- Materials and/or equipment susceptible to ignition should be removed, or if that is not possible, be covered with flameproof tarps or fire blankets.
- A dedicated appropriately sized and type of fire extinguisher must be located in the immediate area.
- Materials and/or equipment susceptible to ignition should be a minimum of 35 feet from the source, or if that is not possible, be covered with flameproof tarps or fire blankets.
- The assigned fire watch must be instructed and trained on the use of fire extinguishers and other firefighting equipment, as required. The assigned task of a fire watch will be fire prevention, including spark containment, equipped with a designated and appropriately sized ABC type extinguisher within the immediate area, as well as have the ability to notify site supervision and emergency facilities in a timely manner. The fire watch must be dedicated to the task and not have additional responsibilities outside of the requirements of the fire watch. The fire watch must remain in the immediate area for at least 30 minutes.

A Fire Watch is not required for temporary heating, if temporary heat is supplied by the use of CSA/America Gas Association certified units equipped with at least the following or a site specific fire monitoring system is implemented:

- Air proving switch which assures sufficient air pressure for combustion and ensures nothing has fallen in front or behind the unit.
- Electrical flame safe-guard system which ensures complete shutdown in the event of flame or ignition failure.
- High temperature limits which shut down the gas automatically in the event of excessive heat.

First Aid and Emergency Resources

This policy establishes the framework for responding quickly and effectively to medical incidents or emergencies in the workplace. It emphasizes having trained personnel, accessible first aid supplies, clear communication procedures, and coordinated emergency response plans.

First aid is the immediate temporary care given to a victim of an accident or sudden illness, until medical services can be obtained. Proper training is necessary for those employees administering first-aid care.

Emergency phone numbers and First- Aid Kits must be available to employees. Each Subcontractor shall provide their own emergency response supplies adequate for their personnel and scope of work. Emergency response materials must be inspected to ensure adequate supply and readiness.

A muster point is the location that personnel evacuate to in the event of an emergency. This will ensure everyone has a safe area they can reach quickly during an emergency. A muster point(s) will be established for the project. It is the responsibility of the Subcontractor to ensure all their personnel, including their tier Subcontractors, know the location(s) of the muster point and promptly report to the muster point when required. The Subcontractor shall also ensure that all their personnel are accounted for. If the Subcontractor has concerns as to the location(s) of the muster point, they shall immediately notify IC project personnel.

Hand and Power Tools

This policy establishes guidelines for the safe use, maintenance, and inspection of hand and power tools in the workplace. It emphasizes proper training, use of personal protective equipment (PPE), adherence to manufacturer instructions, and identification of potential hazards.

Failure to use power and hand tools in strict compliance with their respective manuals can lead to serious safety hazards, equipment damage, and personal injury. Misusing tools or neglecting manufacturer instructions compromises not only the user's safety but also the safety of others in the work area. Adherence to proper tool use is mandatory to maintain a safe work environment and avoid preventable accidents.

Ensure all hand and power tools are in safe operating order and upheld to all manufacturer requirements and recommendations.

- Maintain tools and equipment in good operating condition.
- All safety components shall be in place as required and recommended by the manufacturer.
- Use the proper tool for the task.
- Inspect cords, plugs, and connections on electrical tools and equipment to ensure they are intact and operating properly.
- Protect all tools and equipment from unnecessary bumps, crashes, falls, etc.
- Protect electrical cords from pinching, cutting, or chopping.
    - Defective cords shall be immediately removed from service.
- Do not hoist tools by their electrical cords or air hoses.

Hazard Communications

This policy establishes the framework for identifying, labeling, and communicating chemical and other workplace hazards to all personnel. It emphasizes proper training, access to safety data sheets (SDS), use of appropriate personal protective equipment (PPE), and clear hazard labeling.

The number one defense against a spill is prevention. Never place vehicles or equipment in or near sensitive environments, store all materials in protected and approved areas, store all chemicals in approved and labeled containers, and follow the OSHA hazard communication standard and globally harmonized system (GHS).

Each Subcontractor shall ensure an immediately accessible environmental spill kit(s). The spill kit(s) shall be of adequate size and content for the scope of work, equipment, tools, and task(s) being performed at any given time. All workers shall know where the kit(s) is located and how to utilize it.

The requirements of the IC Hazard Communication Program and GHS include:

- The list of hazardous chemicals shall be readily available to all employees/site personnel who are or could come into contact. Each Subcontractor is responsible for keeping their list up to date and available both in their work area and available immediately upon request by any employee.
- IC safety data sheets (SDS) are immediately and readily available via the *mSDS Source* mobile application, web and/or by scanning the QR code below:

- All containers must be labelled in compliance with the globally harmonized labeling requirements per OSHA.
- All employees and Subcontractor involved in using chemicals in a non-routine task shall receive updated training on the safe use, storage, precautionary measures to be taken, both during normal operating conditions and in foreseeable emergencies.
- The Subcontractor supervisor shall be able to provide affected or applicable employees:
  - Hazardous Chemical list;
  - Any chemical hazards that may be encountered in the normal course of their work;
  - The labeling system in use;
  - The protective measures to be taken when working in adjacent areas;
  - Emergency procedures in the event of overexposure.
  - Location and availability of Safety Data Sheets.

Heat and Cold Stress

Addressing the risks of extreme temperatures, this policy provides guidance to protect employees from heat and cold related hazards. It focuses on recognizing risks using hazard control measures to prevent illnesses, safeguard employee health, and maintain a safe and productive workplace.

- Cold Stress.
  - To control the adverse effects of a cold stress environment the incorporation of engineering controls, administrative controls, and personal protective equipment (PPE) must be taken into consideration. Depending on the temperature, site conditions, and workload, any one of the controls or a combination thereof can be used to eliminate Cold Stress-Related disorders.
  - Subcontractors will monitor weather forecasts to be prepared for potential scenarios, and as needed have the required manpower, equipment and resources to safeguard against cold weather-related illnesses.
    - The daily safety pre-plan must include Cold Stress hazards and controls as it pertains to the scope of work.
- Heat Stress.
  - Each Subcontractor shall have and conform to their own heat emphasis program (HEP).
    - The daily safety pre-plan must include Heat Stress hazards and controls as it pertains to the scope of work.
  - Individuals who are not acclimatized to weather in which the project is to be performed, shall immediately notify their Supervisor so that appropriate heat stress prevention measures can be taken.
  - Subcontractors will monitor weather forecasts to be prepared for potential scenarios, and as needed have the required manpower, equipment and resources to safeguard against heat related illnesses.
  - All employees shall utilize the safeguards available to protect their health.
  - For implementation of controls, Subcontractors are encouraged to reference the NOAA National Weather Service – Heat Index Chart.

Housekeeping and Material Storage

Promoting an organized and hazard-free work environment, this policy provides guidelines for proper housekeeping and material storage practices. It emphasizes keeping work areas clean, storing materials safely, maintaining clear walkways, and disposing of waste appropriately.

Housekeeping encompasses all activities related to the safety and cleanliness of jobsites and facilities. Prevent the public and pedestrians from entering a worksite unless they have obtained proper authorization from the IC Project Team. Ensure that tools and equipment are never left unattended and are properly secured and safeguarded as necessary.

Field Offices, Tool Trailers, and Project Sites/Work Areas:

- Material, tools, or debris may not be stored within 10 feet of the building perimeter or adjacent to shafts or stairwells.
- Material must be stored to promote prompt mobility of material. Pipes, conduits, metal fabrications and steel framing are to be stored on rolling racks or similar means of conveyance. Bulk material must be palletized to allow for easy mobility using a pallet jack or stored on carts with sufficient wheels.
- Elevated location(s) capacities must never be exceeded by any type of material.
- Garbage, scrap, debris and other trash materials are to be properly and immediately disposed of in designated containers and shall be removed on frequent and regular intervals.
    - IC reserves the right to provide a clean-up crew at the Subcontractor's expense if they fail to maintain proper housekeeping and conformance to this policy.
- Waste containers shall never be overfilled.
- Shelved items must be placed in an orderly manner and arranged.
- Floors should be maintained as clean and dry as is reasonably practicable.
- Stairways, aisles, corridors, and passageways must remain free of loose material and debris; they must also never be used for storage.
    - All exits, stairs, and corridors must remain accessible at all times. If this cannot be maintained, re-routing of emergency egress shall be maintained prior to doing so and mitigated as much as possible. This shall be coordinated with the IC project team in advance. Re-routing access can be done by the following:
        - Include temporary wayfinding signage, barricades, or other means to safely, promptly, and visually re-route personnel per local, state, and federal emergency egress and life safety codes.

Impalement Hazards and Mitigation

The purpose of this policy is to prevent injuries from impalement hazards and other work environments by implementing effective safety measures and practices through hazard recognition, proper barricading or guarding, and employee awareness.

Impalement hazards include any object that poses a risk of penetrating the body if fallen upon or struck. This includes, but it not limited to nails, rebar, stakes, or exposed sharp objects. Identified hazards shall be promptly mitigated. Protective measures include, but are not limited to:

- Rebar Protection:
    - Use rebar caps or rebar guards on all exposed vertical and horizontal rebar.
    - Ensure rebar caps are of sufficient size and strength to prevent impalement if fallen upon.
- Guarding and Barricades:
    - Install physical barriers, such as guardrails or covers, around areas with high impalement risks.
    - Use barricades or warning signs to alert workers to potential hazards.
- Tool and Equipment Safety:
    - Store sharp tools and equipment properly when not in use.
    - Use protective sheaths or covers on sharp edges.

Inclement Weather

Recognizing the hazards posed by severe weather conditions, this policy provides guidance for preparing, responding, and working safely during inclement weather. The purpose of this policy is to ensure the safety of all personnel and maintain the integrity of the project during inclement weather and/or adverse conditions. Inclement weather includes, but is not limited to:

- Heavy rain, thunderstorms, or flooding.
- High winds.
- Extreme temperatures.
- Snow or ice conditions.

The Competent Person(s) for each Subcontractor will monitor weather forecasts using reliable sources (i.e. National Weather Service, local weather stations). Weather conditions will be reassessed periodically throughout the day. The Competent Person(s) will decide whether to suspend, delay, or continue work based on the current and forecasted weather conditions.

Workers will be informed of the decision promptly through prompt and effective communication channels (i.e. site meetings, phone calls, text messages).

- Ensure all workers are familiar with the respective emergency procedure(s) in case of sudden severe weather.
- Secure all materials, equipment, and supplies as necessary.

Work will be suspended if weather conditions are deemed unsafe. Affected areas will be made safe and secure before work is halted. Workers will be relocated to a safe area or allowed to leave the site until conditions improve.

The Competent Person(s) will inspect the site for any damage or hazards before resuming work. Work will only resume when it is safe to do so, and weather conditions have improved.

Employees should monitor weather conditions regarding their transportation and commutes. The following includes the policy for transportation during snow emergencies:

- Level 2 Snow Emergency: Roadways are hazardous with blowing and drifting snow. Only those who feel it is necessary to drive should be out on the roadways.
    - If you live and/or travel through any county under a Level 2 snow emergency, only those who feel it is necessary to commute to the jobsite or office should be on the roads. Please use your own discretion and notify your immediate supervisor if you are unable/prefer not to commute as a result of the snow emergency.
- Level 3 Snow Emergency: Roadways are closed to all non-emergency travel due to extremely hazardous conditions. No one should be on the roadway unless it is essential to travel.
    - If you live and/or travel through any county under a Level 3 snow emergency, do not commute to the project or office. Notify your immediate supervisor accordingly.

Lead (Pb) Exposure Control

This policy on lead (Pb) awareness ensures provides guidance for identifying, monitoring, and controlling lead exposure in the workplace to minimize health risks, prevent lead-related illnesses, and maintain a safe and compliant work environment.

If lead is present, you must conduct an initial determination to find out if the employees are or will be exposed to lead levels at or above OSHA's action levels. If employees will be exposed to lead levels at or above OSHA's action levels, levels an Initial Determination/Exposure Assessment must be made as to the extent to which the original coatings or materials contain lead. With respect to the lead related tasks listed in Table 1 of the OSHA standards, until an Initial Exposure Assessment is done, the employer shall treat the employee as if the employee were exposed according to Table 1. All other tasks shall assume exposure above the Permissible Exposure Limits (PEL) until the assessment is completed. Appropriate respiratory protection, personal protective equipment, and hygiene facilities must be provided based on the assumed exposure level.

Each Subcontractor performing work involving lead must complete a Site-Specific Exposure Control Plan (ECP). OSHA standards for lead must be followed for all work involving potential or actual lead exposures. ECP plans must provide for frequent and regular inspections.

Engineering and work practice controls that minimize the potential for generating airborne lead must be used for controlling employee exposure. Areas in which lead-related work is being performed shall be marked off with barriers or barricades, accident prevention signs, etc., as appropriate, to minimize access and potential exposure. All containers of contaminated protective clothing and equipment must be properly labeled. Barrier sign and container information shall conform to OSHA standards and regulations.

Lock-Out Tag-Out (LOTO)

This policy provides guidelines for the proper use of lockout/tagout (LOTO) procedures. It emphasizes isolating energy sources, applying locks and tags, verifying zero energy, and ensuring only authorized personnel perform maintenance or service.

During the servicing and maintenance of machines and equipment, the hazards of unexpected energizing, start up, or the release of stored energy could cause injury or damage.

- Locks for individual employees must be keyed separately.
- There shall be no Master keys, or general use locks, for these individual locks. The employee will have possession of the only key for their lock. It will then be that employee's responsibility to maintain the device.

Each employee or crew performing the work shall lock out the power source feeding any equipment to be repaired, serviced or set up.

- The only exception to this is when it is necessary to leave the equipment energized for the purpose of set-up, adjustment or troubleshooting. This must be reviewed and authorized in advance with the IC Safety Team.
- Only qualified, authorized employees shall be permitted to perform those tasks on energized equipment or systems.
- In addition to disconnecting the power source, it is also required that all residual energy is safely released prior to performing the task.
- For the purpose of this procedure, the troubleshooting process will be considered ended when:
    - A particular problem has been located and repairs are started.
    - Individual equipment components are being replaced.
    - Circuit changes are being made.
- A lock out device may be removed only by either the employee who installed the device, or by the employee's direct manager, and noted as such in the written safety plan for the task.

- No other supervisor/manager may order the removal of a lockout device without obtaining approval or written authorization from the manager of the employee that initially installed the lockout device.

Any Subcontractor needing to utilize techniques for the control of hazardous energy must have written procedures and be coordinated with the IC Project Team in advance a minimum of 72 hours in advance.

Lone Worker

To address the risks associated with employees working alone, this policy provides guidance on monitoring, communication, and emergency preparedness. It emphasizes hazard assessment, use of communication devices, check-in procedures, and access to emergency support.

Working alone describes situations when an employee is:

- The only worker at the workplace.
- Not directly supervised.
- Working at a site where assistance is not readily available.
- In an area where direct contact with a co-worker or supervisor is not available.
- In a dangerous area (either due to work processes or location).

Employees working alone are responsible for:

- Recognizing the hazards associated with their jobs and how to minimize them.
- Reporting hazards to supervisors.
- Working alone only when necessary, rescheduling assignments (when possible) to keep from working alone.
- Participate in a check-in system by contacting someone at regular intervals.
- Carry a personal alarm, cell phone, or two-way radio. Ensure sufficient operation and battery life.

Supervisors/Departments are responsible for:

- Provide communication devices such as cell phones, radios, personal safety alarms.
- Ensure lone workers understand the risks associated with their work and that the necessary safety precautions are carried out.
- Implement controls to eliminate or control hazards prior to lone work.
- Supervision via site visits and/or discussions in which health and safety concerns are raised.
- Evaluate the need for video surveillance cameras, limiting public access, locking all unused doors, coded cards or keys to control access to buildings, alarms, panic buttons, emergency phones, fire alarm or security guards when necessary.

Risk Assessment

- Before allowing a worker to work alone, the daily safety pre-plan must be completed with oversight from the Competent Person(s).

Training

- Lone workers must be sufficiently experienced and /or trained to understand the risks and how to fully take precautions.
- Set limits for the worker as to what can and cannot be done while working alone.
- Ensure employees are competent to deal with circumstances which are new, unusual, or beyond the scope of training, such as when to stop work and seek advice from a supervisor.

- Appropriate first aid and emergency supplies will be provided by the employer. The employee must know where first aid and emergency supplies are stored and how to use them properly with applicable current training.

Mobile Elevated Work Platforms (MEWP)

This policy establishes requirements for the safe operation, inspection, and maintenance of MEWPs to prevent falls, equipment accidents, and related injuries while ensuring safe and efficient elevated work operations.

Only trained and authorized operators shall be permitted to operate a MEWP.

- Always follow manufacturer requirements and recommendations.
- Documented inspections are to be performed prior to each shift.
- Workplace inspection must be performed in the area(s) of operation.
- Employees shall always stand firmly on the floor of the designated working platform.
- Appropriate fall protection and/or prevention must be worn and attached to the boom or basket whenever operating a Boom lift.
    - A site specific fall rescue plan must be in place.
- Boom and basket load limits, specified by the manufacturer, shall not be exceeded.
- The use of a MEWP to lift materials is only permitted when the manufacturer has approved methods and attachments.
- The area where the MEWP will be operated shall be free from holes and subsurface encumbrances. The area shall also be within the tolerances that the manufacturer allows for operating the lift.
- Articulating boom and extensible boom platforms, primarily designed as personnel carriers, must have both platform (upper and lower) controls.
- MEWP's must not be operated within the tolerance zones of overhead utilities per OSHA.

Mobile Equipment

The objective of this policy is to ensure the safe operation, maintenance, and movement of all mobile equipment on project sites. This includes powered industrial trucks, forklifts, earth-moving machinery, and other vehicles used for material handling or transport. The goal is to prevent injuries, property damage, and incidents through proper training, equipment inspection, operator qualification, and adherence to established traffic control and operational procedures.

All manufacturer recommendations and requirements shall be followed. No one shall operate a piece of equipment unless the employee is/has:

- Properly qualified by their employer to perform the work assigned and operate the respective equipment.
- Inspected and is familiar with operations of that particular type of equipment at required frequencies.
- Directed to perform the job function by supervisory personnel.

The following are additional, minimum requirements:

- Complete a pre-shift inspection.
- Only use approved lifting devices.
- When backing equipment, when vision is impaired or limited or there is exposure to public vehicles or persons, a spotter must be used.
- All alarms, controls, and other appurtenances must be in proper working order.

- Platforms and steps must be kept free of mud, ice, snow, grease and oil.
- All equipment engines must be shut off while fueling; ignition must be in the "off" position. A fire extinguisher must be readily available.
- When equipment is unattended, attachments must be grounded, and keys must be removed.
- Lifting personnel in buckets is not permitted.
- All areas where heavy and mobile equipment are used, areas must be evaluated for stability and capacity. Ensure floors or elevated areas are capable of the load of the equipment and any loads applied to the equipment.
- All equipment, owned or rented, must have clear identification as to what Subcontractor is responsible for the equipment for prompt contact purposes.

Cold Weather Equipment Operation Guidelines

- During extreme cold weather conditions, it is essential to follow specific safety measures to protect both personnel and equipment.
- 10-Degree Rule - If the temperature falls below 10°F and does not rise above this threshold, operations should be reconsidered for the day by the competent person with consultation from their employees.

Key Safety Tips for Cold Weather Equipment Operation - Following these guidelines is essential to ensure the longevity of equipment and the safety of personnel in cold weather conditions.

- Clean Tracks Regularly: Ensure that the tracks are kept free of mud and debris.
- Warm Up Attachments: Before using attachments such as buckets, shears, hammers, conveyors, and processors, allow them to warm up.
- Cab Cleanliness: Keep the floor of the cab clean to prevent mud or water from freezing on the pedals.
- Gradual Warm-Up of Machines: Allow machines to reach full operating temperature before use.
- Refuel at End of Shift: If possible, refuel your machine at the end of the shift while the fuel is still warm.
- Proper Starting Procedures: If a machine does not start, avoid excessive cranking.

OSHA and Regulatory Inspection Policy

Maintaining compliance with OSHA and other regulatory requirements is critical for workplace safety and operational integrity. This policy establishes procedures for preparing and responding to inspections by OSHA. IC is dedicated to promoting the health and safety of its employees and Subcontractors and seeks cooperation with all operations that are governed by any Regulatory Agency.

Subcontractor Responsibilities – Follow their company policies for handling an OSHA and/or Regulatory Inspection.

All Employers – Be courteous and professional. OSHA has the right to ask any employee questions. It is your individual right to participate or not; always be courteous and professional.

- Employees have a right to be represented by either their company, union, or a lawyer during all interviews at their discretion.
- Employees also have the right to not be represented by either their company, union, or a lawyer during all interviews.

IC Responsibilities.

- Company Supervisors are responsible for:

  - Immediately notify the IC Director of Safety and immediate Supervisor to communicate the event and reason for an inspection and/or investigation.
  - Act as the Company Representative during an inspection and/or investigation.
- The Company Representative is responsible for representing the company during regulatory safety inspections and/or investigations, specifically by:
  - Attending the Opening Conference.
  - Escorting the Compliance Officer during the entirety of any inspection and/or investigation.
  - Attending the Closing Conference
- IC Director of Safety is responsible for:
  - Assisting the Company Representative and Supervisors during Regulatory Inspections / Investigations.
  - Directing follow-up investigation(s) to evaluate the accuracy of any Citations or alleged Violations.
  - Preparing a file documenting the inspection and any associated Citations.
  - Assisting Corporate Counsel with the management of Citations.
  - Complete *Exhibit F, OSHA Questionnaire.*

- When a Compliance Officer arrives on site, they are required to identify themselves and present their credentials to a Company Supervisor, as well as identify the purpose of their visit.
  - Confirm these credentials and escort them to the project office.
  - Contact the Company Representative and IC Director of Safety.
  - Do not offer or provide documentation without the approval of the IC Director of Safety.
  - Wait for the Company Representative and/or IC Director of Safety to arrive.

Personal Protective Equipment (PPE)

Protecting employees from workplace hazards requires the proper selection, use, and maintenance of personal protective equipment (PPE). This policy establishes requirements for identifying necessary PPE, ensuring its proper fit and condition, and training employees in correct usage.

PPE needed for the task must be noted on the daily safety pre-plan. Any deviations from PPE requirements must be authorized by the Competent Person and assessed by the IC Safety Team. All projects shall always incorporate the following PPE requirements (regardless of the construction phase):

- Hard Hat
  - Type II Hard Hats are encouraged.
  - Shall comply with ANSI Z89.1.
  - Cowboy hard hats, aluminum/metal hard hats, and bump caps are not permitted.
- Eye Protection
  - Shall comply with ANSI Z87.1.
  - Side shields or over glasses must be worn with all prescription glasses. The prescription for the glasses must contain the ANSI Z87.1 rating.
  - Dark or tinted lenses or visors are prohibited to be worn indoors or in low lighting / dark weather conditions.
- High Visibility Garments
  - High visual, safety vests, shirts or jackets shall be worn as the outermost apparel at all times.
  - ANSI Class 2 (0-44 MPH) and Class 3 (45 MPH or more) outerwear must be worn whenever working on or near (within 10 feet) of a roadway.

- Foot Protection
  - Sturdy, leather, and hard soled, closed toe shoes/boots are required at a minimum.
  - Safety toed boots are required when the task requires it.
- Clothing
  - Shirts shall be worn while on all IC jobsites The shoulders must be covered, and sleeve shall extend down the arms by a minimum of 2". Shirts cannot be cut off at the midriff. Shirts should fit close to the body.
  - Long pants made of a durable material to withstand the demands of the jobsite are required for all construction activities. Short pants will not be permitted.
  - Professional courtesy must be used for wear/tear, images, and verbiage on clothing.

Hand Protection

- Protective gloves are required when the task(s) requires it. The glove should be of the proper selection for the task(s). The competent person for the crew or task shall determine the type of protection needed and/or required.

Hearing Protection

- All personnel working on-site must wear appropriate hearing protection when exposed to high noise levels. Subcontractors are responsible for providing and maintaining suitable protective devices for their employees and ensuring they are properly used and maintained. Noise levels will be monitored by the Subcontractor when applicable and hearing conservation practices must be followed at all times.

Arm Protection

- Appropriate arm protection is required during operations where the arms are exposed to cut hazards, including but not limited to demolition tasks, handling and working with metal, (i.e. kevlar sleeves or similar).

During the following operations, face protection in addition to approved safety glasses or goggles are required; welding, burning or cutting, using abrasive wheels, chop saws, portable grinders or files, chipping concrete, stone or metal, drilling or working under dusty conditions, using explosive actuated fastening or nailing tools, and work with hazardous liquids or gasses.

Employees working over or near water, where danger of drowning exists, shall be provided with a U.S. Coast Guard approved life jacket(s) or buoyant work vests. Additionally, for work performed near or around water, OSHA 1926 Subpart E shall be followed.

Additional PPE may be needed based upon the task or exposure and will be determined on an as-needed basis by the Competent Person.

Powered Industrial Vehicles and Lift Trucks

To promote safe operation of powered industrial vehicles and lift trucks on all job sites by establishing clear requirements for operator training, equipment inspection, and safe work practices.

Only trained, certified, and authorized operators shall be permitted to operate a powered industrial truck. Methods shall be devised to train operators in the safe operation of powered industrial trucks.

Truck Operations:

- All manufacturer requirements and recommendations shall be followed.
- Documented inspections are to be performed prior to each shift.
- Rigging directly on and/or from the forks of equipment is prohibited. This includes suspended loads from the forks or other parts of the carriage.
- No person(s) shall be allowed to stand or pass under the elevated portion of any truck, whether loaded or empty.
- When a powered industrial truck is left unattended, load engaging means shall be fully lowered and controls shall be neutralized.
    - A powered industrial truck is unattended when the operator is 25 feet or more away from the vehicle which remains in his view, or whenever the operator leaves the vehicle, and it is not in their view.
    - When the operator of an industrial truck is dismounted and within 25 feet of the truck still in his view, the load engaging means shall be fully lowered, controls neutralized, and the brakes set to prevent movement.
- A safe distance shall be maintained from any leading edge.
- Always maintain appropriate clearances and distances from overhead utilities.
- Brakes shall be set, and wheel blocks shall be in place to prevent inadvertent movement.
- Whenever a truck is equipped with vertical only, or vertical and horizontal controls elevatable with the lifting carriage or forks for lifting personnel, the following additional precautions shall be taken for the protection of personnel being elevated.
    - All hoisting attachments for hoisting personnel must be accompanied with the operations and safety manual.
    - Use of a safety platform firmly secured to the lifting carriage and/or forks.
    - Such protection from falling objects as indicated necessary by the operating conditions shall be provided.
    - Baskets may only be used per the manufacturer's specifications.
    - Equipment being used in conjunction with the basket shall be compatible and approved by the manufacturer to do so. Only use a basket approved by the manufacturer with proper capacity charts in the cab. Do not drive machines from cabs when personnel are on the platform.
    - Do not use the personnel work platform until you understand the capacity charts. If your unit does not have a capacity chart for "personnel work platform work" do not use a basket on that unit.

Respiratory Protection

The purpose of this policy is to protect workers from airborne contaminants such as dust, fumes, vapors, gases, and other hazardous substances that may be present during work activities. This is achieved through proper hazard assessment, implementation of engineering and administrative controls, and the use of appropriate respiratory protection when necessary.

In the control of those occupational diseases caused by breathing air contaminated with harmful dusts, fogs, fumes, mists, gases, smokes, sprays, or vapors, the primary objective shall be to prevent atmospheric contamination. This shall be accomplished, as far as feasible, by accepted engineering control measures. When engineering controls are not feasible, or while they are being instituted, respiratory protection is required to meet all federal, state and local OSHA regulations. Respirators are to be worn when employees are working with or are exposed to gases, fumes, vapors or dusts above the OSHA-permissible exposure limit (PEL) or when an oxygen-deficient atmosphere exists. Respirator users

must be trained in use, selection, maintenance, storage and inspection prior to use. It is the responsibility of contractor management to train its employees.

In order for a Subcontractor to utilize (voluntary or required) a respirator of any kind on IC projects, the Subcontractor must have a Respiratory Protection program that meets the OSHA requirements. IC reserves the right to ask for documentation or proof that all requirements have been completed.

Safety and Health Audits

The objective of this policy is to ensure regular evaluation of workplace health and safety practices to identify hazards, verify compliance, and promote continual improvement. Health and safety audits provide an objective review of site conditions, equipment, and employee behaviors to ensure adherence to company policies, OSHA standards, and client requirements. The goal is to prevent incidents, strengthen safety culture, and drive accountability by implementing corrective actions and tracking progress toward a safer, more efficient work environment.

All Subcontractors are required to conduct a work area safety audit on a weekly basis at a minimum. If deficiencies are observed, they must be corrected immediately. If they cannot be corrected or mitigated immediately, the respective area must be adequately segregated to eliminate personnel from being in the hazardous area, until it is safely mitigated.

Scaffolding

The objective of this policy is to ensure that all scaffolding is designed, erected, inspected, and used in a manner that provides a safe and stable work platform for personnel and materials. This includes compliance with OSHA standards, manufacturer requirements, and site-specific safety procedures.

When scaffolds are required on construction sites, pre-planning is required to determine the scaffold type, strength, and design. All scaffold systems must meet all manufacturer and OSHA requirements, at a minimum.

Scaffolds and scaffold components shall be inspected for visible defects by a competent person before each work shift, and after any occurrence which could affect a scaffold's structural integrity. All scaffolds must have an inspection tag. Scaffolds shall be erected, moved, dismantled, or altered only under the supervision and direction of a competent person qualified in scaffold erection, moving, dismantling or alteration. Such activities shall be performed only by experienced and trained employees selected for such work by the competent person.

Every employee who performs work while on a scaffold shall be trained by a person qualified in the subject matter to recognize the hazards associated with the type of scaffold being used and to understand the procedures to control or minimize those hazards. Every employee who is involved in erecting, dismantling, moving, operating, repairing, maintaining, or inspecting a scaffold shall be trained by a competent person to recognize any hazard associated with the work in question.

Cross bracing shall not be used as guardrails for fall prevention. Provide proper access for scaffolds. Climbing the sides of scaffolding is not permitted unless the scaffold is designed for that purpose.

All mobile scaffolds must conform to manufacturer requirements and wheels must be locked when in use. Guardrails are required on mobile scaffolds when the working platform is at or greater than 6 feet.

Suspended scaffolding, such as swinging stages, boatswain (bos'n) chairs, floats and needle beams, requires coordination with the IC Project Team before use. While using suspended scaffolding, attach and secure a safety harness before stepping on the platform and do not remove it until clear of the scaffold. Tie off to an independent lifeline or building structure. Use one lifeline per person.

Supported Scaffolding such as "Pump Jacks" shall be set up and used per the manufacture's recommendations. Pump Jacks are a uniquely designed scaffold consisting of a platform supported by moveable brackets on vertical poles. Supported scaffolds poles, legs, posts, frames, and uprights must bear on base plates and mud sills, or other adequate firm foundations. Specific Requirements for Pump Jacks:

- Pump jack brackets, braces and accessories must be fabricated from metal plate3s and angles.
- Each pump jack bracket must have two positive gripping mechanisms to prevent any failure or slippage.
- When guardrails are used for fall protection, a workbench may be used as the top-rail only if it meets all requirements of a top-rail.
- Poles must be secured to the structure by rigid triangular bracing, or equivalent at all locations.
- When poles are made of wood, the pole lumber must be
    - Straight grained
    - Free of shakes
    - Free of large loose or dead knots, and other defects that might impair strength.
- When wood poles of two continuous lengths are joined together, the seam must be parallel to the bracket.
- To develop full strength when two-by-fours are spliced to make a pole, mending plates must be installed at all splices.

Silica

This policy aims to protect workers from the dangers of respirable crystalline silica that can be released during tasks such as cutting, grinding, drilling, or demolishing materials like concrete, masonry, stone, or tile. The objective is to reduce exposure through engineering controls, safe work practices, wet methods, ventilation, and use of proper respiratory protection when needed.

When performing any type of physical work on materials that contain Silica that could lead to the release of respirable crystalline silica, Subcontractor's must:

- Ensure all personnel have completed a general silica awareness training.
- The Competent Person for Silica shall be onsite and supervise the operation(s).
- Maintain compliance with OSHA's silica standard.
- Have a site specific Exposure Control Plan (ECP).

Stairways and Ladders

The purpose of this policy is to ensure the safe use of stairways and ladders on all job sites to prevent falls and related injuries. The objective is to make certain that all stairways and ladders are properly selected, constructed, inspected, and maintained in compliance with OSHA standards and manufacturer guidelines.

A stairway or ladder shall be provided at all personnel points of access where there is a break in elevation of 19 inches or more, and no ramp, runway, sloped embankment, or personnel hoist is provided.

- Employees shall not use any spiral stairways that will not be a permanent part of the structure on which construction work is being performed.
- A double-cleated ladder or two or more separate ladders shall be provided when ladders are the only means of access or exit from a working area for 25 or more employees, or when a ladder is to serve simultaneous two-way traffic.
- When a building or structure has only one point of access between levels, that point of access shall be kept clear to permit free passage of employees. When work must be performed or equipment must be used such that free passage at that point of access is restricted, a second point of access shall be provided and used.
- When a building or structure has two or more points of access between levels, at least one point of access shall be kept clear to permit free passage of employees.
- Subcontractors shall provide and install all stairway and ladder fall protection systems required by OSHA and shall comply with all other pertinent requirements therein before employees begin the work that necessitates the installation and use of stairways, ladders, and their respective fall protection systems.

The following requirements apply to all stairways:

- Stairways shall meet all OSHA standards and regulations, at a minimum.
- Stairways that will not be a permanent part of the structure on which construction work is being performed shall have landings of not less than 30 inches in the direction of travel and extend at least 22 inches in width at every 12 feet or less of vertical rise.
- Riser height and tread depth shall be uniform within each flight of stairs, including any foundation structure used as one or more treads of the stairs.
- Where doors or gates open directly on a stairway, a platform shall be provided, and the swing of the door shall not reduce the effective width of the platform to less than 20 inches.
- Metal pan landings and metal pan treads, when used, shall be secured in place before filling with concrete or other material. When temporary materials are used, the depth of the pan must be filled.
- All parts of stairways shall be free of hazardous projections, such as protruding nails.
- Slippery conditions on stairways shall be eliminated before the stairways are used to reach other levels.
- Unprotected sides and edges of stairway landings shall be provided with guardrail systems.
- The following requirements apply to all stairways as indicated:
    - Stairways having four or more risers or rising more than 30 inches, whichever is less, shall be equipped with at least one handrail; and one stair rail system along each unprotected side or edge.
    - Mid rails, screens, mesh, intermediate vertical members, or equivalent intermediate structural members shall be provided between the top rail of the stair rail system and the stairway steps.
    - Screens or mesh, when used, shall extend from the top rail to the stairway step, and along the entire opening between top rail supports.
    - Handrails that will not be a permanent part of the structure being built shall have a minimum clearance of 3 inches between the handrail and walls, stair rail systems, and other objects.

Adhering to the following safe work practices will significantly reduce the risk of injury when working from ladders.

- Ladders must be rated for the employees using them. If the rating sticker is damaged and/or not legible, the ladder must be removed from service.
- Aluminum ladders are prohibited on IC projects.
- Ladder Jacks are prohibited on IC projects
- When ladders are used to gain access to an elevation, the top of the ladder must be properly secured at the top and bottom.
- Ladders constructed on the jobsite must conform to OSHA standards.

- All ladders are to be inspected before use each day. Defective ladders must be removed from service.
- Extended reaching while positioned on a ladder should be avoided. Never reach to an extent that the center of the body, at the waist, extends past the side rail of the ladder.
- When ascending or descending a ladder, always face the ladder and use both hands for climbing. Do not skip steps or rungs while climbing or descending.
- Do not carry materials or tools up, or down, a ladder.
- Ladders should not be used in a horizontal position—as a substitute for runways or scaffolds.
- Ladders being used near doors or in passageways must be protected against being struck by the door or traffic.
- Use the right type of ladder relative to the task.
- Ladders must never be placed on boxes, barrels, or other unstable supports to obtain additional height.
- Job-built ladders are to be constructed of sound materials per OSHA standards and regulations.

Step Ladders.

- Follow all manufacturer requirements.
- The use of LEANSAFE ladders are encouraged.
- Step ladders must be fully opened and locked position while being used.
- Step ladders should not be mounted higher than the second tread from the top, unless the ladder is specifically designed for this purpose and constructed to include a top platform and rails.
- The use of multi-point folding ladders are not permitted.

Extension / Straight Ladders.

- Follow all manufacturer requirements.
- When working from an extension ladder or straight ladder, it is necessary to ensure the ladder is properly secured.
- Place the base of an extension or straight ladder one-quarter of its approximate length from a wall or support. Ladders must be secured at the top and bottom when in use.
- Place the feet of extension and straight ladders on a flat, firm surface.
- Straight or extension ladders are not to be mounted higher than the third rung from the top.
- Extension ladders must always extend a minimum of 3 feet above the supporting surface when used to gain access to a flat surface.

Steel Erection

This policy is designed to ensure the safe performance of all steel erection activities and to maintain a controlled and coordinated work environment by ensuring proper planning, use of fall protection, inspection of equipment and rigging, and communication among all personnel involved in the erection process.

- The erection Subcontractor shall develop a site-specific erection plan that includes the name of the qualified rigger, qualified signal person(s), and competent person.
- A preplanning meeting with the steel erector, crane operator and other Subcontractors as necessary must be conducted before the start of the job.
- The erection Subcontractor is not to erect steel unless a written notification has been received indicating that the concrete in the footings, piers and walls or the mortar in the masonry piers and walls has attained 75 percent of the intended minimum compressive design strength, at a minimum.
- The erection Subcontractor shall not create overhead hazards and must establish and coordinate with all other Subcontractors and the IC Project Team, controls to prevent these hazard(s).

- Loads shall not be placed on steel joists or other structural members, without having been fully installed, bridged, and secured per the design and specification requirements set forth by the Structural Engineer of Record.
- Connect all pieces with a minimum of two bolts or as required by the design criteria and specifications, whichever is more stringent.
- Metal decking will not be laid unless it is secured by the end of the working shift.
- Subcontractor must provide appropriate training as per OSHA standards and regulations.
- The area below steel erection activities must be barricaded (with signage) to prevent access by unauthorized personnel.
- A hoisted steel member shall not be released until it is anchored by at least two bolts at each connection.
- Tag lines must be used to control loads.
- Multiple lift rigging ("Christmas Treeing") may be used when limited to a maximum of 3 members.
- Loose material, tools, and containers for rivets, bolts or welding rods must be secured to prevent falling.
- The erector is responsible for determining if extra plumbing equipment is needed and providing as needed.
- All local, state, and federal standards and regulations shall be followed for crane erection and dismantling.

Training, Learning, and Development

Continued health and safety training provides the knowledge necessary to perform a job safely by establishing expectations and responsibilities for employees on how to perform job tasks. Knowledge acquired by participation in training is one of the methods used to create an effective safety culture. Failure to actively participate in safety training exposes the individual to risk of injury. Re-training and/or additional training may be assigned and warranted for non-conformance to the IC Health & Safety Manual, Site-Specific Safety Program, or at-risk behaviors. This will be assessed and assigned by the Employees' Supervisor and/or IC Safety Team at any time.

Safety Representative or appointed liaison is responsible for:

- Identifying federal / state / local regulated training requirements.
- Communicating federal / state / local regulated training to employees.
- Develop and provide the most effective instructional delivery systems for employee training through universal curriculum and content across all regions.
- Create training profiles based upon job responsibilities or activities.
- Assisting supervisors on how to identify and provide training for specific workplace Hazards.
- Monitor company compliance of regulated training requirements.
- Evaluating and validating newly hired employees that provide training from previous employers, third-party training institutions / manufacturers, and trade organizations.
- Evaluation of instructor's delivery of training.

Safety Department / Team is responsible for:

- Providing or arranging for task specific training.
- Delivering uniform curriculum and content across all regions and divisions
- Tracking employee compliance of regulated requirements

Project Management and Supervision are responsible for:

- Allocate time to individual(s) to complete safety training sessions.
- Ensuring employee(s) attend training sessions in-person or on-line.
- Request training(s) to the Safety Department for employee(s) in need.

Employee(s) are responsible for:

- Completing federal / state / local regulated and company training within specified or required time frames.
- Notifying your supervisor right away of any reasons that required training cannot or may not be completed.
- Immediately inform your supervisor if you encounter a hazard that you have not been trained for.
- Providing fair and constructive evaluation of training content when requested.

Traffic Control

This policy is designed to ensure the safe and efficient movement of vehicles and pedestrians on and around work sites. The objective is to minimize the risk of accidents, injuries, and property damage by implementing proper traffic control measures, including signage, barriers, flagging, and designated routes.

When work encroaches upon the traveled way, traffic control measures must be used in accordance with the authorizing agency and follow US Department of Transportation Manual on Uniform Traffic Control Devices (MUTCD) or the prevailing State equivalent.

Work must be planned and conducted to provide for the safety of the general public and employees. Traffic Control Devices (TCD) of appropriate size and number must be placed at the appropriate locations to warn the public of lane closures and other traffic control measures. All TCD shall meet the US Department of Transportation Manual on Uniform Traffic Control Devices (MUTCD) or the prevailing State equivalent specifications.

Flaggers, or other means allowed by the MUTCD, must be used at all locations where barricades and signs are inadequate to control traffic. Employees that are responsible for traffic control must be trained in the fundamentals of traffic control and the proper use of TCD.

When operating equipment along the road, at no time should any piece of equipment protrude into a live lane of traffic unless Flaggers, appropriate roadblock or vehicle escort is established.

A daily inspection of the work zone should be conducted by a competent person to identify and eliminate unsafe conditions.

Trench and Excavation

This policy is established to ensure the safe planning, execution, and monitoring of all trenching and excavation activities. The objective is to protect workers from cave-ins, falls, hazardous atmospheres, and other risks associated with underground work. The goal is to enforce proper site preparation, shoring, sloping, and inspection practices, while promoting awareness, training, and adherence to OSHA standards to maintain a safe and controlled excavation environment.

Prior to penetrating the ground and starting the trench and/or excavation process:

- Ensure the competent person for Trench and Excavation is identified.
- Contact the utility companies and the owners and ask them to identify the exact location of the underground utilities. Dial the local One Call Center from anywhere in the country to be routed to your local One Call Center. All underground utilities must be marked. If they are private lines, we may have to contact a 3rd party marking service.

- Call for utility marking per state and local requirements, but no more than 10 working days before beginning any excavation work.
- Tickets remain active unless the markings are no longer visible and need remarking or there is a state expiration time frame.
- Private utilities must be marked and/or located through a third party and must be completed by the Subcontractor performing the respective scope of work.
- Digging around underground utilities shall be completed with careful, prudent, and nondestructive means. Any known and/or active utility intersecting the proposed dig must be located via hydro excavation (also known as "daylighting" or "pot holing") or dig by hand operations until the utility is physically located.
    - An 18-inch tolerance zone for the utility marking is to be implemented when the utility is not in the location as marked (hand dig or hydro excavation must be performed at the utility marking until the utility is located, up to 18 inches on each side of the marking horizontally). If the utility is not located within the tolerance zone, contact the utility owner/locating service for next steps.
    - For daylighting / hydro-excavating, the following must be in place, at a minimum:
        - Be bonded and or grounded, and
        - Have the wheels chocked,
        - Operators must use proper PPE including a face shield, hearing protection, eye protection, high visibility outer garments, gloves, and boots as required.
        - Hydro excavated holes must have demarcations identifying the areas such as potential barriers, signaling/communication, temporary rails or markings. Hydro excavated holes must have manhole covers with "Open Hole" marked on the cover.

All surface encumbrances that are so located as to create a hazard to employees shall be removed or supported, as necessary to provide a safe work environment.

- All excavations 20 feet or greater in depth that will be bodily entered shall be designed by a Professional Engineer.
- All excavation in which employees must enter shall be protected from cave-ins by an adequate protective system except when:
    - The competent person has identified that the excavations are less than 5 feet in depth and examination of the ground provides no indication of a potential cave-in. This must be verified each shift in which the excavation will be occupied.
- Protective systems shall have the capacity to resist, without failure, all loads that are intended or could reasonably be expected to be applied or transmitted to the system. Protective systems include:
    - Sloping and/or Benching
    - Shoring
    - Non-engineered steel plates are not considered legal trench protection. Trench protection systems must be either designed by a registered professional engineer or constructed according to OSHA's standard requirements.
    - Trench Boxes
    - Engineered Systems

Position cranes, trenchers, back-hoes, trucks, and other large equipment must be far enough from the edge of the excavation to minimize pressure on the sidewalls.

Employees shall be protected from excavated or other stored materials or equipment that could pose a hazard by falling or rolling into excavations by placing and keeping such materials or equipment at least two feet (2') from the edge of excavations.

A pre-shift inspection of excavations, the adjacent areas, and protective systems shall be conducted by the competent person for each Subcontractor entering the excavation, prior to the start of work and as needed throughout the shift. Inspections shall also be made after every rainstorm, when conditions change, or other hazard increasing occurrence(s).

- These inspections are required when employees are entering the excavation. Open excavations and trenches must be protected.
    - Where a competent person finds evidence of a situation that could result in a possible cave-in, indications of failure of protective systems, hazardous atmospheres, or other hazardous conditions, the excavation must be evacuated until the necessary precautions have been taken to ensure their safety.
- The proper use of a stairway, ladder, ramp, or other safe means of egress shall be located in trench and excavations that are 4 feet or more in depth and must be within 25 feet of lateral travel for employees.
- Ladders shall be secured at the top and extend 3 feet above the support system.
- Ramps shall be installed at an angle between 30 and 50 degrees.

Only necessary employees shall be allowed next to open excavations that are not benched or sloped. All other employees shall remain a minimum of 2 feet from the excavation edge.

All excavations affected by accumulated water (ground, rain, etc.) must be made safe with water removed prior to personnel entering a trench or excavation.

Where oxygen deficiency (atmospheres containing less than 19.5 percent oxygen) or a hazardous atmosphere exists or could reasonably be expected to exist, such as in excavations where there are petroleum contaminated soils or excavations in areas where hazardous substances are stored nearby, the atmospheres in the excavation shall be tested before employees enter excavations greater than 4 feet in depth.

For all activities and scope that requires ground penetration, *Exhibit R, Ground Disturbance Utility Checklist* must be completed a minimum of 48 hours prior to ground disturbance activities commencing. Ground penetration activities include, but are not limited to, trenching, excavating, boring, drilling, driving posts, etc.

Summary

Safety is everyone's responsibility. Together, we uphold a culture of safety, accountability, and continuous improvement on every job site.

IC reserves the right to add or change this Manual, as deemed necessary, to maintain the safety of the project personnel, property and environment. This Manual is designed to proactively manage, control and eliminate incidents throughout the construction process. It is to be used in conjunction with the IC Site Specific Safety Program as well as the Subcontractor's Safety Program(s). The more stringent element of each program shall supersede the other and will be followed unless otherwise directed by IC. IC expects full cooperation of all contractors, regardless of tier, in monitoring, supervising, and enforcing these requirements.

Exhibit A – Safe Task Analysis Form

Forms can be requested from the IC Safety Team or internal filing system. Subcontractors shall utilize their own forms for daily planning.

Exhibit B – Crane Utilization Checklist

Please ensure to use the most updated revision (REV), which can be found at the bottom of the Form. Forms can be requested from the IC Safety Team or internal filing system.

Exhibit C – Incident Response and Reporting Flowchart

Please ensure to use the most updated revision (REV), which can be found at the bottom of the Form. Forms can be requested from the IC Safety Team.

Exhibit D – Incident Report

Please ensure to use the most updated revision (REV), which can be found at the bottom of the Form. Forms can be requested from the IC Safety Team. Subcontractors shall utilize their own forms for documenting the incident.

Exhibit E – Hot Work Permit

Please ensure to use the most updated revision (REV), which can be found at the bottom of the Form. Forms can be requested from the IC Safety Team or internal filing system.

Exhibit F – OSHA Questionnaire

Please ensure to use the most updated revision (REV), which can be found at the bottom of the Form. Forms can be requested from the IC Safety Team or internal filing system. If applicable, Subcontractors shall utilize their own forms or policy/procedures for documenting the visit.

Exhibit G – Silica Exposure Control Plan

Please ensure to use the most updated revision (REV), which can be found at the bottom of the Form. Forms can be requested from the IC Safety Team or internal filing system. Subcontractors shall utilize their own forms for creating the plan.

Exhibit H – Site Specific Safety Program / Addendums and Revisions

Please ensure to use the most updated revision (REV), which can be found at the bottom of the Form. Forms can be requested from the IC Safety Team or internal filing system. Subcontractors shall use their own forms.

Exhibit I – Site Specific Orientation

Please ensure to use the most updated revision (REV), which can be found at the bottom of the Form. Forms can be requested from the IC Safety Team or internal filing system.

Exhibit J – Self Perform Group Procedures

RESERVED; IN PROGRESS.

Exhibit K – Competent Person Form

Please ensure to use the most updated revision (REV), which can be found at the bottom of the Form. Forms can be requested from the IC Safety Team or internal filing system.

EXHIBIT L - Site Visit Indemnification and Hold Harmless Agreement

Please ensure to use the most updated revision (REV), which can be found at the bottom of the Form. Forms can be requested from the IC Safety Team or internal filing system.

EXHIBIT M – Corrective Action and Coaching Form

Please ensure to use the most updated revision (REV), which can be found at the bottom of the Form. Forms can be requested from the IC Safety Team or internal filing system.

EXHIBIT N – Controlling Contractor Steel Commencement Letter

Please ensure to use the most updated revision (REV), which can be found at the bottom of the Form. Forms can be requested from the IC Safety Team or internal filing system.

EXHIBIT O – Confined Space Checklist

Please ensure to use the most updated revision (REV), which can be found at the bottom of the Form. Forms can be requested from the IC Safety Team or internal filing system.

EXHIBIT P – Crisis Management and Emergency Action Plan

Please ensure to use the most updated revision (REV), which can be found at the bottom of the Form. Forms can be requested from the IC Safety Team or internal filing system.

EXHIBIT Q – Energized Work Checklist

Please ensure to use the most updated revision (REV), which can be found at the bottom of the Form. Forms can be requested from the IC Safety Team or internal filing system.

EXHIBIT R – Ground Disturbance Utility Checklist

Please ensure to use the most updated revision (REV), which can be found at the bottom of the Form. Forms can be requested from the IC Safety Team or internal filing system.