



WOHLSEN
CONSTRUCTION

Safety & Health Manual

“Nothing we do is more important than planning and conducting our activities safely.”

July 2021

Table of Contents

Section	Page
Wohlsen’s Vision and Values	3
Wohlsen’s Safety Vision Statement	4
Wohlsen’s Commitment to Safety	5
Roles & Responsibilities	7
Fit for Duty	7
Ergonomics/Office Safety	7
Safety Orientation.....	7
Hazard Communication	8
Accident/Incident Reporting.....	10
Subcontractors.....	10
Traffic Control/Site Logistics/Proper Work Attire	11
Personal Protective Equipment	12
Tools & Equipment	13
Welding/Cutting and Hot Work.....	14
Electrical Safety	15
Lockout/Tagout	18
Fire Protection.....	19
Scaffolds & Aerial Lifts.....	20
Ladder Safety	21
Excavation Safety	22
Fall Protection	23
Crane Safety	25
Rigging Material Handling.....	25
Housekeeping	26
Crystalline Silica	27
Safety Inspections/Audits	27
Stop Work Policy	28
Disciplinary Process.....	28
COVID-19 Precautions and Protocols.....	30

Our Vision

A relentless pursuit of excellence.

Our Values



Safety

Nothing we do is more important than planning and conducting our activities safely.



Collaboration

We generate success through a team-oriented approach.



Integrity

We build trust through everything we do.



Accountability

We deliver on our commitments.



Continuous Improvement

We have a passion for improving our performance through listening, learning and innovation.



Safety Vision Statement

We are uncompromising in our relentless commitment to the safety and health of our team members that include subcontractors, clients and communities.

Key components of our desired safety culture are listed below:

Leadership: All teammates are Empowered AND Motivated safety leaders

- Ensure Safety remains our #1 Value
- Personal commitment demonstrated through consistent actions, active participation in safety initiatives and teammate engagement
- Proactive approach towards safety in all areas of our business

Education: Wohlsen promotes and teammates pursue advancing safety knowledge

- Wohlsen's Safety Vision Statement is incorporated in all training and education programs
- Training programs designed to engage and motivate teammates
- Team driven training to develop and maintain knowledge, skills and safety attitude
- Continued education in safety is a requirement of career development

Processes: Clearly defined, communicated and understood

- Processes are aligned with our #1 value and promote the Safety Vision Statement
- Systems in place to monitor the level of execution of safety processes
- Processes focus on promoting safety behavior of all teammates to achieve an incident free environment
- Project Teams are empowered and encouraged to further enhance specific safety program requirements
- Pre-planning, operations and production are consistent with Safety Vision Statement

Evaluations: Performed consistently and timely with transparent reporting focused on improvement

- Periodic measurement of progress towards Safety Strategic Plan implementation
- Data captured through Inspections/Audits used to identify improvement opportunities
- On-going evaluation, rating and access to vendor performance data

Investigations: Excellent opportunity for team development through lessons learned

- Team driven investigations based on clearly defined expectations
- Investigations are conducted with a win – win approach
- Root cause and corrective actions identified on every incident and near miss
- Knowledge sharing system in place for efficient and timely communication of lessons learned

Goals: Relentless pursuit of Safety Vision Statement

- Goals clearly defined, communicated and in support of Safety Vision Statement
- Goals based on safety implementation performance, not incidents
- Incident free environment is a belief (commitment)

Wohlsen's Commitment to Safety

Nothing we do is more important than planning and conducting our activities safely.



Safety Program

Wohlsen Construction Company has a formal Safety and Health Program which is administered by the Safety and Health Department (right) and executed by each project team in the field.

While the Safety and Health Department is responsible for the administration of the program, it is the responsibility of all Wohlsen Construction team members, from the senior executive level to field craft labor, to ensure that the requirements and provisions of the program are executed on a daily basis. Safety is our number one value as a company, and it influences all of our decisions.

Safety Culture

Wohlsen Construction has both a vision for the Safety and Health Program as well as a formal policy statement developed and endorsed by the senior management of the company. The vision and policy are taken from our Safety and Health Manual are as follows:

- Safety will be incorporated in all decisions and activities.
- Every employee is empowered to act and stop or prevent unsafe work activities.
- Wohlsen will be a preferred employer for workers seeking safe and healthy work conditions.
- Wohlsen's safety culture and results will help promote a favorable competitive position.

Safety Team



Adam Brown, CSP, CESCO
Safety Director

BS in OSHM from Millersville University
20+ years' construction safety experience



Alan B. Houck, ASP, CHST
Safety & Health Manager
Central Pennsylvania & Connecticut

BS in Environmental Science from Mansfield University
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Wesley N. Donahue, CUSP
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BS in Psychology from Rutgers University
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Safety & Health Manager
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BA from Monmouth University
15+ years' construction safety experience

Wohlsen's Safety & Health Policy

Management considers no phase of operations or administration of greater importance than loss prevention and believes that incidents which result in personal injury and/or damage to property and equipment represent needless waste and loss. Therefore, it is Wohlsen's expectation to conduct all operations safely, thereby preventing injuries to employees and damage to property. Planning for safety will be incorporated into all phases of the company's work. A project-specific safety plan will be developed to improve understanding of expectations and execution of work being performed. Pre-installation meetings will be scheduled with subcontractors with emphasis on safety, scope of work and schedule.

It is the policy and primary responsibility of all Wohlsen employees to develop and maintain safe and healthy workplace conditions for all Wohlsen employees, Wohlsen subcontractors, the public and environment. Wohlsen is committed to planning and completing construction to protect the environment and communities where we are working. This will be accomplished through site-specific safety plans, safety training, information, programs, procedures and policies as outlined in this manual or as developed for job-specific conditions. All subcontractors are expected to abide by the provisions of the Wohlsen Safety & Health Manual and site-specific safety program.

Loss Control Principle

Construction is a dangerous occupation. Situations involving potentially hazardous conditions can occur if preventative measures are not taken. It is important to be alert to these potential conditions and to respond with safety in mind at all times.

The principle of loss control is based on the importance of preventing injuries to our employees, promoting conservation of property and preserving the earning potential of employees and the company. It requires all employees to have a personal concern for the protection of life and property.

Incident and accident prevention and property conservation measures will be integrated with operating functions as prime responsibilities of all employees. Supervisors are responsible for maximizing the prevention of incidents in work areas or projects under their direction and are further responsible for thorough safety and incident control and instruction of their employees. In addition, all supervisory personnel are responsible for being alert to, identifying, and correcting potential safety hazards.

The basic objective of the policy is to establish, throughout the entire organization, the firm and fully accepted concept that people and property are our most important company assets, and conservation will receive top priority support and participation.

Wohlsen's Safety and Health Policy has been signed and endorsed by Senior Leadership.

Section 1 Roles & Responsibilities

Wohlsen Leadership - Clear and consistent direction of safety as Wohlsen's #1 Value

Project Executive - Empower the Project Team to execute our Safety Vision and Values

Wohlsen Project Team - Ensure 100% implementation of Wohlsen's safety program

Wohlsen Safety Team - Support the project team and administer Wohlsen's safety program

Section 2 Fit for Duty

In order to provide a safe workplace, employees must be able to perform the essential duties of their jobs in a safe, secure, productive and effective manner without presenting safety hazards to themselves, other employees or the public. A fitness for duty exam can determine if the employee is physically and/or psychologically able to safely perform their current role.

Section 3 Ergonomics/Office Safety

Ergonomics - fitting a job to a person - can help prevent employees from experiencing musculoskeletal disorders. When working in an office environment, employees could experience injuries if they do not take the proper steps.

When working at a desk, position monitors slightly above your eye level. Increase the font size on your computer to avoid straining your eyes. Use an adjustable chair, stand and stretch periodically and reposition your keyboard, monitor or chair to stay flexible.

Never stand on a chair to reach something overhead. Always get a proper A-frame ladder or ask for help. Make sure all carpets are laid flat to prevent trips and falls. Use a headset for frequent or prolonged phone use to avoid neck strain. Be sure to maintain a clean and orderly workstation to prevent tripping hazards. Avoid running electrical cords under carpet or through windows and doorways. Also, don't fasten them with unapproved devices, such as staples. When handling materials, always bend with your knees, get help for heavy or bulky items and be sure you have a clear path of travel. Be sure to shut file cabinet doors after use to prevent a tripping hazard. Never block access to exit doors or prop open fire doors and know your emergency evacuation procedures.

Section 4 Wohlsen Safety Orientation

Wohlsen believes that communication and the understanding of expectations are critical components in any effective safety and health program. All Wohlsen employees are required to participate in Safety Orientation.

The orientation program is designed to provide company-specific safety information, requirements, rules, and expectations to Wohlsen employees.

Every project will also have a Site-Specific Safety Orientation. All Wohlsen employees, subcontractors, and client representatives will be required to participate in the orientation. The orientation program is not intended to represent or replace the safety training responsibilities of employers of employees working on a Wohlsen project. It is the responsibility of each subcontractor, lower-tier contractor, supplier and vendor to ensure that

their employees have been properly trained in accordance with any/all local, state and federal laws, codes or regulations covering their operations and scope of work.

Project-Specific Orientation Process

- A Wohlsen-authorized orientation trainer will provide the Project-Specific Safety Orientation to all Wohlsen employees, subcontractors, vendors and suppliers on the project PRIOR to their work beginning.
- The orientation trainer will ensure that all participants complete and sign the orientation acknowledgment form.
- A numbered site-specific orientation sticker will be provided to each attendee. The orientation sticker is valid for the length of the project and is not transferable to other Wohlsen projects.
- The sticker number and corresponding name will be entered in an orientation and observation tracking log.

Section 5 Hazard Communication Program

Wohlsen Construction Policy

It is the policy of Wohlsen Construction to ensure that information about the dangers of all hazardous chemicals used by Wohlsen Construction is known by all affected employees. The following hazardous communication program has been established to facilitate the dissemination of information. All field and office employees will participate in the hazard communication program. This written program will be available at the project site or Wohlsen office for review or reference.

Training Program

Employees will be provided with information and training on hazardous chemicals in their work area at the time of their initial assignment and/or whenever a new chemical hazard is introduced into their work area. Information on specific chemicals or categories of hazards is to be included in the training. Proper container labeling, including secondary containers, must be maintained and legible for all workers on the site. Safety Data Sheets (SDS) must be immediately available upon request and kept on file in the Wohlsen project trailer or office.

Container Labeling

All containers containing hazardous chemicals or potential hazardous chemicals must be clearly labeled. Manufactures' labels must be maintained in such a manner that the information communicated from the manufacture is legible.

The Project Superintendent will verify that all containers are clearly labeled as to the contents, noting the appropriate hazard warning, and list the name and address of the manufacturer.

The superintendent at each project will ensure that all secondary containers are labeled with either an extra copy of the original manufacturer's label or with labels that have the identity and the appropriate hazard warning.

Safety Data Sheets (SDS)

The Project Manager is responsible for establishing and monitoring the project's efforts relative to the collection and maintenance of SDS. They will make sure procedures are developed to obtain the necessary SDS's and will review incoming SDS's for new or significant health and safety information. They will further see that any new information is passed on to affected employees.

The Project Superintendent shall verify that all materials brought on to the site have a current SDS on digital storage. When an SDS is not received at the time of initial delivery, the Superintendent (or their designee) will:

1. Request an SDS from the subcontractor, product vendor; and/or,
2. Request an SDS from product manufacturer

Wohlsen SDS Management Process

- Request SDS from all Subcontractors as a submittal prior to work starting
- Review SDS status during pre-installation meeting (received or pending)
- Store and maintain SDS from all Subcontractors in Wohlsen trailer/office
 - Digital storage on P drive or Project Dashboard*
 - Subcontractor Foreman maintains SDS file on site

*OSHA requires SDS to be immediately accessible upon request. To have electronic storage, the project must have a backup in the event of a power loss or computer failure. Acceptable back up would be an iPad that can access SDS without being connected to a network. If any project does not have a backup, hard copies shall be maintained as the back up to electronic files.

Subcontractor Hazard Communication Programs

It is the responsibility of all Subcontractors working on a Wohlsen project to maintain a Hazard Communication Program in accordance with the requirements of OSHA CFR 1910.1200. Individual subcontractors are responsible for their own HAZCOM manuals. A copy of all subcontractors' HAZCOM programs and Safety Data Sheets are to be given to a Wohlsen Construction Project Representative and will then be located in the project trailer.

The Subcontractor Hazard Communication Programs and related SDS will be made available upon request to other site contractors who may come into contact with these materials during the course of operations.

Section 6 Accident/Incident Reporting

An accident is defined as any unscheduled event causing damage to property and/or persons. An incident is any unscheduled event, which results in delays of activities and presents the potential for damaging persons or property. These also include "Near Misses."

In the event of an accident/incident or near miss, regardless of the severity of the occurrence, a written report and a completed investigation form must be submitted within 24 hours by supervisory personnel to the Wohlsen Safety & Health Department. Notification is to be made immediately via phone.

Subcontractors must notify a Wohlsen Project Team member immediately and follow the 24-hour investigation and reporting requirements. Documentation of the investigation must be provided in report form.

Investigation is critical in determining the root cause and in the further elimination of any hazardous conditions or unsafe practices.

All site employees are required to notify their immediate supervisor in the event of an accident, injury or near miss. It is imperative that proper treatment and care is provided to any injured employee.

Section 7 Subcontractors

The term "subcontractor employee" is considered to mean a person who agrees to perform any part of the labor or material requirements of a contract for construction, alteration, or repair on behalf of a subcontractor. The definitions of project "subcontractor and subcontractor employee" will apply to every tier of sub subcontractor and their employees, suppliers and all workers who enter the project and perform a portion of the contract involving labor. Persons furnishing supplies, materials or technical support will also be considered a "subcontractor employee." To the extent that a subcontractor of any tier agrees to perform any part of the contract, he also assumes responsibility for complying with the provisions of the safety management plan and will be referred to as site employees.

Prior to the commencement of work on the project, subcontractors will develop and submit to Wohlsen a Site-Specific Safety and Health Program that addresses the hazards associated with the subcontractor's scope of work, as defined in Wohlsen's Site-Specific Safety Plan Policy.

A safety representative (Competent Person) from each sub subcontractor will be designated to the project. The representative from each sub subcontractor must have the authority to stop work of their work force in the event of a safety issue.

The subcontractor project safety representative will ensure that their site employees, suppliers and technical support, regardless of tier, comply with the Wohlsen Safety Policy, their Company's project-specific safety and health and HAZCOM programs, the contract documents,

the project-specific safety plan, OSHA standards and all other federal, state and local codes, laws and regulations.

Each Subcontractors' Superintendent/Foreman Will:

- Plan and execute all work operations so as to comply with stated objectives of the project's site-specific safety plan.
- Ensure that all employees are scheduled for and complete project's Safety Orientation prior to working on site.
- Complete, when requested or required by Wohlsen, a Job Hazard Analysis, or JHA, for any high-hazard scope of work. A JHA may be requested at any time in advance of the start of a particular scope of work associated with the contract documents.
- Good housekeeping is an important part of overall project safety. It is the responsibility and requirement of all site employees, supervisors and workers to keep the workplace clean.
- Provide and enforce the use of personal protective equipment for their site employees as is required by the project, federal, state and local regulations or codes.
- Complete an accurate investigation report of all injuries, losses to public property or personnel, equipment and material with submission to the Wohlsen project superintendent within 24 hours of occurrence.
- Attend all safety and project meetings as scheduled by the Wohlsen project management team.
- Schedule and complete weekly toolbox safety meetings with all their employees. The toolbox safety meetings will be held once per week. Toolbox safety meetings will be documented and cover topics pertinent to work being performed. Toolbox safety meetings will be conducted by the subcontractor superintendent or designated foreman and attended by all field subcontractor site employees. All subcontractor site employees will sign the meeting form and are encouraged to make topic suggestions. Copies of the weekly toolbox safety meetings must be provided to the Wohlsen project superintendent by the close of business each Friday.
- Report to the Wohlsen Project Team all unsafe conditions, practices and violations observed on the project, including those that are not within the subcontractor's direct control, to implement corrective action.
- Maintain and communicate the Contractor's Hazard Communication Program on site. The program must be current and up-to-date. A copy of the program will be provided to the Wohlsen Project Team and kept in the Wohlsen project trailer.

Section 8 Traffic Control/Site Logistics/Proper Work Attire

All material deliveries or heavy equipment that operates or travels on the existing roadways open to public traffic must have a flagman to accompany the load or equipment. It is the responsibility of each subcontractor to provide the required flagging and flag person to escort their equipment or deliveries to the destination of operation or storage.

All subcontractors should read and understand the site logistics plan.

Proper work attire is required on Wohlsen projects. Long pants (not sweatpants) and sleeved shirts must be worn. Prescription glasses must be ANSI-approved with side shields or be covered with safety goggles. Jewelry is not permitted on projects.

No music streaming of any kind is permitted on the project. This includes ear buds and radios.

Section 9 Personal Protective Equipment [Subpart E]

Wohlsen and our subcontractors must ensure that the correct personal protective equipment (PPE) is provided to and used by employees working on the project.

The planning process allows for the use of several methods of exposure elimination, reduction and control of the hazards. Those methods include engineering controls, work practices and administrative controls. When the use of engineering controls, work practices and administrative controls are not feasible or do not provide sufficient protection, Wohlsen and our subcontractors must ensure that the correct PPE is provided to and used by employees working on the project.

This policy does not eliminate the need for subcontractors to perform a Hazard Assessment to determine the full PPE needs of their employees. It is intended to communicate the minimum requirements for PPE for persons accessing or working on the project.

Wohlsen has established a list of required personal protective equipment for all projects:

- Hard Hats – Must meet the ANSI Z89.1 requirements
- Safety glasses with side shields – Must meet the ANSI Z87 requirements
- Work boots with ankle support and hard sole for puncture resistance
- High-visibility shirts with sleeves or vest

Specific tasks may require additional PPE such as gloves, a face shield, hearing protection, dust masks, respirators, etc.

All visitors to a Wohlsen project who will access construction areas are expected to follow the PPE requirements. If a visitor does not have the required PPE to access the construction area, Wohlsen may provide a hard hat, safety glasses and high-visibility vest. Proper footwear is expected and visitors wearing open toed shoes, high heels or sandals will not be permitted to walk the project. All visitors are expected to check in with the Wohlsen Project Team on site and be escorted while accessing construction areas.

Section 10 Tools & Equipment [Subpart I]

Unsafe or poorly maintained tools and equipment can lead to a poor-quality job, but also to injuries to the worker using those tools. To ensure that no injuries arise out of the use of a defect tool or the use of an improper tool, the following must be adhered to:

- Tools and equipment must be maintained in a safe condition and only used in the manner for which they are intended and designed.
- Any power-operated tool designed to accommodate a guard **MUST** be equipped with a guard. Any employee observed willfully disabling a guard will be suspended from the project.
- Employees are required to inspect tools and equipment prior to use and tag the equipment appropriately.
- Any damaged or defective tool must be removed from the project.
- Employers must permit only qualified/certified employees to operate machinery and equipment. Wohlsen requires all certified operators to present training cards issued by a qualified instructor prior to operating equipment. Training must be current within the past three years and refreshed when initial training expires. Operators found to be in violation of safety rules or involved in an incident must complete refresher training prior to being allowed to operate the equipment.
- Employees operating vehicles or equipment are solely responsible for the safe operation of the vehicle. This includes any transported personnel or loads, as well as the securement of loads and adherence to the lifting capacity of the equipment.
- Operators of vehicles and equipment will inspect for defects at the beginning of each shift. Defective vehicles or equipment must not be used.
- Equipment provided with only an operator's seat will not be used to carry passengers unless an approved personnel platform or seat has been provided.
- Vehicles with a restricted view to the rear will be equipped with an operable and audible backup alarm.
- Blades and buckets of earth-moving equipment will be lowered to the ground when unattended and at the end of the workday.
- Engines will be shut down during refueling operations. Smoking is prohibited in refueling areas. Refueling will be done while maintaining contact between the hose and tank. No open flames or combustible materials are to be in or around the refueling area. A spill kit will be maintained on site by the subcontractor/operator for use in the refueling area.
- All vehicles and equipment must be operated in accordance with the Wohlsen Site Logistics Plan and maintain a minimum clearance of 10 feet from any energized power lines (overhead lines). Any alterations to this plan must follow Section 12, Electrical Safety, with an appropriate completed JSA.
- Operators unloading equipment must ensure that trailers or delivery vehicles have tire chocks in place and are secured prior to unloading.

- Operators will set the emergency brake and shift into neutral or park prior to dismounting equipment.
- Operators will don appropriate personal protective equipment if the equipment they are using is not equipped with an enclosed cab. Hard hats and safety glasses are required to be with the operator during equipment operations and must be used if the cab does not provide adequate protection.

Section 11 Welding/Cutting and Hot Work [Subpart J]

All construction work involving the use of welding, cutting with torches or other heat sources requires a Hot Work Plan to be completed and approved by Wohlsen prior to the start of the operation. The Hot Work Plan is to be completed by the Competent Person and include the following information:

- Identification and training verification for those employees performing the work
 - Employees performing welding, cutting or hot work must have documentation of training to address the safe operation and use of equipment and processes
- Identification of Qualified Personnel or Vendor for equipment repairs
 - Defective or unsafe equipment must not be used and removed from service
 - Repairs may only be completed by the Qualified Person or Vendor
 - Repaired equipment may only be returned to service after verification of repairs has been provided to Wohlsen
- Description of work to be performed and safety precautions to reduce fire hazards
 - Basic description of the work to be done and safety precautions
 - Alternative measures necessary
 - Removal of fire hazards (combustible materials) from the work area
 - Use of protective devices (guards, fire blankets, shields)
- Stop work conditions and identity of authorized personnel to issue order
 - Hot work will not be performed if hazards are not able to be moved to a safe location
 - Hot work will not be performed if guards or controls are not used to prevent fire hazards
- Ventilation or respiratory protection requirements for work involving metals
 - Identification of hazardous metals to be completed by the Competent Person
- Completion of a Hot Work Permit by the Competent Person
 - Use of Wohlsen's Hot Work Permit is required
 - Permit must be approved by Wohlsen to authorize work
 - Completed permits must be kept on site
- Identification of the designated Fire Watch (to be listed on the Hot Work Permit)
 - Fire Watch is required when performing Hot Work near combustible materials, in areas where a fire may develop or in compliance with Client requirements
 - Fire Watch personnel must provide verification of training in the operation of fire extinguishers and acknowledge the project Crisis Management Plan to sound an alarm

- Must have appropriate fire extinguishers in the immediate work area
- Fire Watch must remain in place for one hour after hot work has been completed
- Additional time may be required for specific clients and listed on the Hot Work Permit

Section 12 Electrical Safety [Subpart K]

It is Wohlsen's policy to comply with Federal OSHA, applicable state regulations, the National Electrical Code and other established safety standards to reduce or eliminate the dangers associated with the use of electrical energy. The electrical safety program is intended to give those persons who may come in proximity with energized electrical parts in their work activities the knowledge of safety and recommended practices necessary to protect against electrical shock or burns. It is Wohlsen's policy that all management, supervisors and employees follow the fundamental principles of Safe Work Practices described in this program. A clear understanding of these principles increases the safety of those who work with or around electricity.

It is very important that we recognize electrical hazards so that we can identify Safe Work Practices and methods to control those hazards. Electrical Hazards include:

- Electric Shock - Electricity is one of the most commonly encountered hazards. Under normal conditions, protection from shock is afforded by the safety features of the electrical equipment. Nonetheless, accidental contact with electricity can cause serious injury or death. Most electrical systems establish a voltage reference point by connecting a portion of the system to an earth ground. Because these systems use conductors that have voltages with respect to ground, a shock hazard exists for workers who are in contact with the earth and exposed to the conductors. If people come in contact with a "live" (ungrounded) conductor while they are in contact with the ground, they become part of the circuit and current passes through their bodies.
- Electrocutation – A fatal electrical shock.
- Burns – There are three basic types of burns suffered in an electrical incident: electrical burns, arc burns and thermal contact burns. In electrical burns, tissue damage (whether skin deep or deeper) occurs because the body is unable to dissipate the heat from the current flow. Typically, electrical burns are slow to heal. Arc burns are caused by electric arcs and are similar to heat burns from high-temperature sources. Temperatures generated by electric arcs can melt nearby material, vaporize metal in close vicinity, burn flesh and ignite clothing at distances up to 10 feet. Thermal contact burns are those normally experienced from skin contact with the hot surfaces of overheated electric conductors.
- Fire – Electrical currents can cause fires either to clothing of an employee or other combustible material with which the electrical current may come into contact. If the material has a low conductive rate resulting high resistance, a fire is possible. Additionally, electrical fires can occur when circuits are overloaded and the circuit breaker is defective.

Electrical Safe Work Practices

- ONLY Qualified electricians are permitted to work on any electrical system or component of a system. **Qualified person (Electrical):** One familiar with the construction and operation of the equipment and the hazards involved (OSHA); an individual that has sufficient understanding of a device, system or piece of equipment to be able to positively control any hazards it may present. The individual must possess the experience and training necessary to execute the work per recognized and accepted technical standards.
- A Ground Fault Circuit Interrupter Program (GFCI) is in effect on all Wohlsen projects. GFCIs are required for use on any temporary, permanent or generator-supplied outlets that are not equipped with a GFCI. GFCIs ARE REQUIRED FOR USE AT ALL TIMES. GFCIs must be installed at the outlet, not the tool end of the extension cord.
- All temporary and permanent electrical work, installation and wire capacities will conform to the National Electrical Code and other applicable federal, state and local codes.
- Only qualified electricians familiar with code requirements will be allowed to perform electrical work.
- No employee will be permitted to work close enough to an unprotected electrical power circuit such that they may contact the same in the course of their work unless the employee is protected against electrical shock by de-energizing the circuit and grounding it or by guarding it with effective insulation or other means.
- All temporary electric wiring will be installed so that the wiring cannot be damaged when materials are moved as construction progresses.
- Suitable barriers or other means will be provided to ensure that the workspace for electrical equipment will not be used as a passageway during periods when energized parts of electrical equipment are exposed.
- Each temporary disconnect box will be legibly marked to indicate its purpose unless located and arranged so that the purpose is evident.
- Use electrical devices only as intended. Electrical devices may not be modified beyond the intent of their design. Electrical equipment is only safe when it is used according to its intended purpose. Some examples of misuse of electrical equipment are: constructing home-made extension cords or deforming a contact to enable it to fit a receptacle for which it was not intended.
- Always consider electrical equipment energized unless positively proven otherwise. When working on electrical equipment, treat the equipment as live until it is tested, locked, tagged, shorted, and /or grounded as appropriate.
- Reset circuit breakers only after the problem has been corrected. Do not attempt to reset a circuit breaker unless the problem has first been identified and corrected or isolated.
- Only those persons who are qualified and authorized may install, repair, test or calibrate electrical devices or equipment.

- Electrical equipment is considered safe only when it is used as specifically intended by its listing and design. Equipment must not be altered beyond the original design intent and must not be used for any purpose other than that for which it was constructed.
- Isolate all sources of dangerous voltage and current with covers and enclosures. Access to circuits must be guarded against accidental contact by either screw-on panels or interlocked doors, panels, covers, etc. The frame or chassis of the conductive enclosure must be connected to a good electrical ground with a conductor capable of handling any potential fault current.
- A minimum safe clearance distance of 10 feet will be maintained when working in an elevated position near energized power lines (overhead lines). Only Qualified Persons may perform work inside the safe clearance distance after a Job Hazard Analysis (JSA) has been completed and the power lines have been de-energized or protected by other means, such as temporary blankets or barriers. The JSA must reference OSHA CFR 1910.333(c)(3)(ii) and list the approach distance to be followed per Table S-5 (Construction CFR 1926.403(i)(1)(i) table K-1).
- Protective measures, such as signage or protective shields/barriers, will be utilized to ensure that employees do not enter spaces with electrical hazards or exposed energized parts unless proper lighting is in place to allow them to work safely. OSHA CFR 1926.56 Illumination table D-3 will be followed for all areas of operation.
- Conductive items of clothing may not be worn in areas with potential electrical hazards unless they are protected by covering, wrapping, or other non-conductive measures. Jewelry, including wrist watches, is not to be worn while performing electrical work.
- All temporary lights will have basket type protection.

Extension Cord Safe Work Practices

- Extension cords used with portable electrical tools and appliances will be of the three-wire type. Cords with the ground probe removed or rendered ineffective will be removed from service.
- Electrical cords and trailing cables will be covered, elevated, or otherwise protected from damage that could create a hazard to employees or other persons in the area. A weekly cord roll up program will be utilized to prevent hazards and maintain work areas.
- Use only approved and properly maintained extension cords that have no exposed live parts, exposed ungrounded metal parts, damage or splices.
- Making repairs to extension cords is prohibited (repairing cord ends) as they alter the cord from the Manufacturer's approved state.
- Use extension cords that are protected by a ground fault circuit interrupter (GFCI) around construction sites, in damp areas or in an area where a person may be in direct contact with a solidly grounded conductive object. The GFCI can consist of a special circuit breaker, a GFCI outlet or an extension cord with a built-in GFCI.
- Always use three-conductor (grounded) extension cords – even if the device has a two-conductor cord. Never use two-conductor extension cords.

- Avoid running extension cords through doors, ceilings, windows or holes in the walls. If it is necessary for short-term use, make sure the cord is protected from damage, does not create a tripping hazard and is removed immediately when no longer in use.

Section 13 Lockout/Tagout (LOTO) [Subpart K]

In addition to the Electrical Safety program, additional areas have been identified for work specific to “Lockout/Tagout” procedures and are listed in this section.

Wohlsen Construction and our Subcontractors will utilize several methods to eliminate the hazards associated with electricity. This includes potential energy from sources such as hydraulic, stored energy (tension), pneumatic, thermal or other sources.

- ONLY qualified electricians are permitted to work on any electrical system or component of a system involving lockout/tagout procedures. **Qualified Person (Electrical):** One familiar with the construction and operation of the equipment and the hazards involved (OSHA). An individual that has sufficient understanding of a device, system or piece of equipment to be able to positively control any hazards it may present. The individual must possess the experience and training necessary to execute the work according to recognized and accepted technical standards. This training must include:
 - Recognition of hazardous energy source, type and magnitude of energy available
 - Methods and means necessary for energy isolation and control
 - Purpose and use of the energy control procedure
 - Directions for any other employee whose work operations are or may be in an area where energy control procedures may be utilized
 - When tagout systems are used including the limitations of a tag
 - Tags are not to be removed without authorization
 - The tag is never to be ignored or bypassed

Training is to be completed prior to initial assignment, when there is a change in job assignments or there is a change to the equipment/machine, energy control procedure or a new hazard is discovered.

- Qualification and authorization to perform electrical work involving lockout/tagout procedures are based upon a combination of formal training, experience and on-the-job training. Documented verification of training must be signed, certified and provided to the Wohlsen Project Team prior to any work being performed involving electrical work.

Lockout/Tagout and Energy Control Procedure

- Electrical equipment or machinery will be de-energized and rendered inoperative by locking out supply switches and using established procedures for that specific machine or equipment prior to performing work on such equipment or machinery unless power must be applied for the purpose of adjustment or electrical trouble-shooting. If lockout devices are not feasible, a tagout system will be used at all points where the equipment may be energized. A qualified electrician should assist other crafts to lock out or tag out electrical machinery.

- Prior to power shutdown, the qualified electrician must be aware of the energy source (type), magnitude, associated hazards and methods to control the energy.
- Controls of equipment or circuits to be deactivated during the course of work will be tagged out.
- Equipment or circuits that are de-energized will be locked out, or tagged out where locks are not feasible, at all points where such equipment or circuits can be energized to isolate the energy source.
- Locks and tags will be placed and marked to identify the equipment or circuit being worked on and include the name of the employee placing the device and their employer.
- After locks and/or tags have been placed, all potential energy must be rendered safe by relief, restraint or disconnect methods.
- Prior to starting work on machines or equipment that have been locked and/or tagged out, the qualified electrician will test and verify that the energy has been isolated. If the potential energy may build up during the work being performed, this verification will continue until the work is complete or the potential of buildup no longer exists.
- Lockout/tagout procedures will be limited to the trade performing the work during their scheduled shift as determined in the scope of work.
- In the event that multiple trades must perform lockout/tagout work on the same equipment or power source, each qualified electrician will place their own lock and/or tag to remain in place during their work and only be removed by the person who placed the lock and/or tag.
- The process of multiple trades using lockout/tagout procedures on the same equipment or power source must be coordinated by a designated qualified electrician. This person will be responsible for the exposure and protection of a set number of employees and include any personnel or shift changes.
- All Subcontractors performing electrical work are subject to periodic inspections conducted to verify that requirements for the energy control procedure are being followed. These inspections are to be documented and completed annually for the duration of the project.

Section 14 Fire Protection [Subpart F]

SMOKING is not permitted on the jobsite. Designated smoking areas will be provided if permitted by the client.

A fire extinguisher not less than 5# class ABC will be provided for each 3,000 square feet of building area and the maximum travel distance between extinguishers will not exceed 100 feet.

All fire extinguishers are subject to monthly visual inspection and annual maintenance record review by any member of the Wohlsen Project Team. Subcontractors providing portable fire

extinguishers are responsible for maintaining inspections and maintenance on their equipment with documentation provided to the Wohlsen Project Team.

A fire extinguisher will be immediately available for use during any cutting, welding or burning, or other work that creates and ignition source.

A fire extinguisher rated at least 10# class ABC will be provided whenever more than five gallons of flammable or combustible liquid, or five pounds of flammable gas is being used on the project.

Combustible materials such as scrap lumber and debris will be removed 50 feet from areas where hot work activities are occurring.

Employee Training

Only employees trained and who feel confident should attempt to extinguish a fire. Training will include basics of fire extinguisher use and the P.A.S.S. (Pull Aim Squeeze Sweep) system along with hazards associated with basic firefighting procedures to be completed prior to initial assignment and then on an annual basis.

Note: The use of video or electronic training elements in replacement of a live fire are acceptable as part of a fire safety training program, provided they meet the same demonstration of competency by the employee.

Section 15 Scaffolds & Aerial Lifts [Subpart L]

Any subcontractor utilizing a scaffolding system to complete any part of their scope of work must identify their designated Competent Person in writing prior to the start of scaffolding erection.

Scaffolds

- The designated Competent Person will be responsible to ensure that the scaffold system is constructed in accordance with OSHA standards as well as manufacturer instruction for erection including all parts from the same manufacturer.
- The Competent Person will be required to complete daily pre-operational safety inspections and to determine the fall protection systems to be used during the construction, use, and disassembly of the scaffolding system.
- Only employees that have been trained by a qualified person to recognize the hazards associated with the type of scaffold being used and to understand the procedures to control or minimize the hazards will be permitted to work on the scaffold. Wohlsen reserves the right to request scaffold training documentation from any subcontractor utilizing scaffolding systems.
- All scaffolds must have ladder access.
- The working areas of a scaffold must be fully decked.

- Guardrails should be installed at the proper levels as described in Section 18, Fall Protection.
- Toe-boards or other means of protection are required when falling object hazards are present.

Aerial Lifts

- Employees working from aerial lifts must be provided with and wear a full-body harness and lanyard attached to the anchor point provided in the lift basket.
- Only authorized and trained personnel may operate the lift.
- Never exceed aerial lift and basket load limits.
- The guardrail system on the lift must be maintained and the gate or chain opening used to access the equipment must be in the closed position.
- Do not stand on the boom lift mid-rail or top-rail. An employee's feet must remain on the platform of the equipment.
- Lift brakes will be set and when outriggers are used, will be positioned on pads or a solid surface.
- Upper and lower controls must be provided and employees working from the lift must be familiar with operating them.
- Lifts can only be moved with an employee inside if the equipment was designed for that use.
- Modifications of an aerial lift must not occur unless approved by the manufacturer .
- When lifts are used inside buildings, precautions must be taken to monitor carbon monoxide emissions and reduce hazardous levels of exposure.
- All lifts being used on a project must come with current service and inspection documents.
- Concrete slabs, bituminous paving and finished flooring will be protected from lift tire damage as needed.

Section 16 Ladder Safety [Subpart X]

- Each subcontractor working on the project will comply with the provisions of OSHA CFR 1926.1053 – 1926.1060.
- It is the employer's responsibility to provide training to each employee that ensures employees can recognize hazards related to ladders and the procedures to be followed to minimize those hazards.
- Only non-conductive ladders are permitted on Wohlsen projects.
- The type of ladder will be selected based on the task to be completed. The correct type of ladder and the correct rated capacity for the job must be used.

- Working from ladders, step or extension, at heights over six feet from the ground or working surface requires fall protection.
- The condition of the ladder will be inspected prior to set up and use. No defective or broken ladders will be used on the project.
- Ladders will be set up in accordance with the manufacturer instruction.
- All manufacturer labels, warning stickers, and other instructions will be present and legible.
- Ladders must be placed on a sound footing; they will not be placed on unstable objects such as loose bricks or mud.
- Employees will not carry tools, materials, or objects while climbing and will avoid leaning from side to side or away from the ladder and remain having three points of contact.
- Employees will face the ladder while climbing and only one worker at a time is permitted on a ladder.
- Step or A-frame type ladders will be used with the spreaders/locking bars fully engaged.
- Only 2-in-1 cross step ladders may be used in the closed position as recommended by the manufacturer.
- Ladders must not be used as a component for scaffolding.
- Straight and extension ladders:
 - Must have non-skid safety feet
 - Must be secured at the top when in use for accessing another level
 - Must be placed at an angle of one foot of run for every four feet of rise
 - Must extend a minimum of three feet above the landing surface
 - May not be separated into two ladders for any purpose

Section 17 Excavation Safety [Subpart P]

An excavation is any man-made cut, cavity, trench, or depression in the earth's surface formed by earth removal. This can include excavations for anything from cellars to highways. A trench is defined as a narrow underground excavation that is deeper than it is wide, and no wider than 15 feet at the bottom.

Excavation Safe Work Practices

- Prior to any excavation activities, the location of any underground utilities should be located by using the One-Call System (811) or designated utility company. Existing drawings, as built, or other document reviews will also be completed.
- A Competent Person as defined by OSHA must be present on-site anytime employees are working in an excavation. A Competent Person must inspect an excavation and the areas around it daily for possible cave-ins, failures of protective systems and equipment, hazardous atmospheres, or other hazardous conditions before allowing workers to enter and perform their tasks.

- Inspections are also required after natural events such as heavy rains or manmade events, such as blasting that may increase the potential for hazards. If the inspector finds any unsafe conditions during an inspection, you must clear employees from the hazardous area until proper safety precautions are implemented.
- All excavations five feet or greater in depth must be protected by sloping, benching, shoring, or shielding. The protective measure to be used in an excavation less than five feet in depth will be determined by the Competent Person on the job.
- Keep materials or equipment that might fall or roll into an excavation at least two feet from the edge of excavations, use retaining devices, or both.
- Warning systems such as mobile equipment, barricades, hand or mechanical signals, or stop logs will be used to alert operators to the edge of an excavation when the operator may have difficulty visually seeing the edge of the excavation.
- Excavations that are to be left open during construction or unattended after work is complete for the day must be protected with a barricade and/or visual warning to protect workers. Stakes with orange fencing, flagging or rigid barriers are to be in place around edges of open excavations.
- Scaling will be provided when needed to remove loose rock or soil, or install protective barricades and other equivalent protection to protect employees against falling rock, soil, or materials.
- Employees are not permitted to work on faces of sloped or benched excavations at levels above other employees unless you provide the employees at the lower levels with adequate protection from the hazard of falling, rolling, or sliding material or equipment.
- Employees are prohibited from standing or working under loads being handled by lifting or digging equipment.
- Employees are required to stand away from vehicles being loaded or unloaded to protect them from being struck by any spillage or falling materials.
- Excavation operations must be free from water accumulation. A Competent Person must determine the best means to be utilized to eliminate water accumulation and direct the dispersion away from other areas where it could create hazards.
- Safe access and egress to all excavations, including ladders, steps, ramps, or other safe means of exit must be provided for employees working in trench excavations four feet or deeper. These devices must be located in the excavation within 25 feet of all workers.

Section 18 Fall Protection [Subpart M]

It is the responsibility of each Subcontractor employer completing any scope of work to assess the fall hazards/exposures related to that scope of work and ensure that they have planned for this exposure and apply the principals of pre-planning, engineering controls, guarding, fall restraint, and personal fall arrest systems to protect their employees. Work areas must also be kept clear of debris, materials or other materials that can create slip/trip/fall hazards.

Fall Protection Safe Work Practices

- All site employees exposed to an elevated fall of six feet or greater in height will be protected from falls to lower levels by guarding, fall restraint and/or personal fall arrest systems.
- A fall protection plan completed by a Competent Person is required when workers are exposed to fall hazards.
- All workers must be trained in fall protection hazards, methods of protection and all elements required in the fall protection plan.
- All components of fall protection systems (lanyards, harness, retractable, etc.) must be inspected prior to use.
 - Any damaged/defective equipment must be immediately removed from service.
 - Any equipment subjected to fall must also be removed from service.
- All fall protection equipment must be properly maintained and stored to protect against weather/project hazards.
- Tools and/or equipment being used at heights must be tethered or secured to prevent falling object hazards to workers below.
- Restricted access zones must be in place where elevated work is in place (setting steel and/or decking, demolition, re-roofing, etc.).
- Work being performed from step ladders next to edges, including open stairwells, must have secondary fall protection in place or be protected by additional guard rails being installed.
- All employees will be protected from being struck by falling objects using toe-boards, guardrails, safety nets or ground level barriers.
- All floor openings two inches or greater in size must be protected with a cover or barrier system.
 - Covers must be able to support at least twice the weight of employees, equipment, and materials that may be imposed on the cover at any one time.
 - To prevent accidental displacement resulting from wind, equipment, or workers' activities, all covers must be secured. All covers will be color coded and be marked "HOLE" or "COVER."
- No worker is to remove a cover or barrier system installed by any contractor without first contacting who installed it, planning work that is needed to remove the cover or barrier and proper methods of secondary fall protection is in place (fall restraint or fall arrest systems).
- Open-sided floors and platforms six feet or more in height must be guarded.
- Guardrail systems must have a top rail of 42 inches (plus or minus three inches) capable of withstanding 200 pounds of pressure, mid-rail halfway between the top rail and working surface capable of withstanding 150 pounds of pressure and toe board to protect against falling object hazards. Cable guardrail systems must meet all of these

requirements, have the top rail flagged at every six feet for visibility and no more than two inches of deflection when force is applied in any direction.

- The use of a personal fall restraint or personal fall protection systems must be determined by a Competent Person.
- Only designated and trained personnel will be authorized to use personal fall restraint and/or personal fall arrest systems. Wohlsen reserves the right to request in writing the documented training of all subcontractor employees working with fall protection equipment.
- A Retrieval Plan must be included in the fall protection plan related to rescue of an employee in the event they suffer a fall. The Retrieval Plan must list all equipment and personnel to be utilized in the rescue.

Section 19 Crane Safety [Subpart CC]

Cranes are one of the most useful and productive pieces of equipment on a jobsite. Crane accidents, on the other hand, can be outright devastating to a project and the employees working on the job. OSHA standards **29 CFR 1926.1400 – 1442**, which set forth the requirements of crane regulations, must be complied with at all times on this project. Wohlsen reserves the right to increase the safety requirements relative to crane operations at any time if it will provide a safer work place.

Wohlsen does not own or operate cranes but our subcontractors are expected to use cranes on the project. Wohlsen's responsibilities as it relates to cranes on our jobs include:

- Site preparations for any subcontractor who informs us in advance that they will be utilizing a crane on the project (use must be agreed upon)
- Notification to the crane operator of any known underground hazards – utility locations, vaults, and history of sink holes or voids.

Crane Safe Work Practices

- Completed crane lift plan
- Crane safety procedures
- Name of the lift supervisor (if needed)
- Erection sequencing plan (if needed)
- Copy of the annual inspection
- Copy of the crane operator's license/certification
- Copies of the rigger's qualification
- Copies of the signalperson's certification

Section 20 Rigging Material Handling [Subpart H]

All construction work involving the use of rigging/material handling requires a Qualified Person to be operating machinery and approved by Wohlsen prior to the start of the operation. Verification of training will be provided to Wohlsen and identify those employees determined

to be Qualified Persons for each Subcontractor on a Wohlsen project. The Qualified Person is responsible to ensure the following practices are in use and enforce compliance with all safety measures.

- Inspection for rigging equipment will be done to ensure it is safe for use
 - Employees should inspect all equipment prior to use on each shift
 - As necessary if equipment, material, etc., are changed
- Defective rigging or unsafe equipment must be identified
 - Defective or unsafe equipment must not be used and removed from service immediately
 - Repairs may only be completed by the Qualified Person or Vendor
 - Repaired equipment may only be returned to service after written verification of repairs has been provided to Wohlsen
- Rigging equipment will not be loaded beyond its recommended safe working load
 - Identification markings, indicating rated capacity for the type(s) of hitch(es) used
 - The angle upon which it is based
 - Number of legs, if more than one, will be permanently affixed to the rigging
- Rigging equipment must be properly stored/secured at all times
 - Rigging equipment not in use will be removed from the immediate work area
 - Rigging equipment should be stored as not to present a hazard to employees
 - Rigging equipment will be stored to protect from damage, including weather
- Tag lines will be used unless their use creates an unsafe condition
- Latches are in place to eliminate hook throat openings
 - Hooks on overhaul ball assemblies, lower load blocks, or other attachment assemblies will be a type that can be closed and locked.
 - An alloy anchor type shackle with a bolt, nut and retaining pin may be used as an alternative if determined to be necessary by the Qualified Person
- Suspended Loads
 - All employees will be clear of loads about to be lifted and of suspended loads

Section 21 Housekeeping [Subpart C]

All subcontractors are required to keep the work area clean and orderly. Poor housekeeping leads to a higher potential for slips and falls, creates potential fire hazards, attracts rodents and pests and lowers productivity. All workers are required to keep walking surfaces free from these hazards.

Garbage and other waste will be disposed of at frequent and regular intervals. Scrap and debris from work activities will be removed from work areas daily. Materials will be stored in an orderly fashion, clear of work areas and traffic lanes. Protruding nails will be removed or bent over in scrap lumber.

Every worker on the project is expected to clean up after themselves during the course of a workday. Subcontractors are expected to clean their work areas periodically throughout the day.

If a subcontractor does not meet the expectations associated with housekeeping practices, Wohlsen Project Team may:

1. Request that the subcontractor provide manpower to participate on a general clean-up crew.
2. Use Wohlsen manpower and apply back charges to the subcontractor.
3. Utilize the weekly cord roll up program for Friday afternoons.

Section 22 Crystalline Silica Safety [Subpart Z]

Crystalline silica is an important industrial material found abundantly in the earth's crust. Quartz, the most common form of silica, is a component of sand, stone, rock, concrete, brick, block, and mortar. Materials containing quartz are found in a wide variety of workplaces.

Silica dust is hazardous when very small (respirable) particles are inhaled. These respirable dust particles can penetrate deep into the lungs and bring about disabling and sometimes fatal conditions including cancer, silicosis, and other physical effects.

- A written plan is REQUIRED to be submitted which details the tasks that involve exposure to silica, the controls and respiratory protection used to prevent exposure for each task, housekeeping measures and procedures used to restrict access to work areas.
- Provide the name of the Competent Person that will implement the written plan.
- If duration of exposure is 15 minutes or less and the 8-hour time weighted average can reasonably be anticipated to remain under the permissible limit, please indicate this next to the tasks involving silica exposure and submit to Wohlsen on company letterhead.

Best Practices for Controlling Silica Exposure

1. Use water wherever and whenever possible. The best, easiest and most cost-effective system to controlling silica exposure is to utilize water when cutting concrete, block, brick, tile, etc.
2. Set up cutting stations close to the water supply and away from the majority of the work force. Try and maintain a single cutting area for all brick and block work.
3. Where water cannot be used, in a completed building or completed area, a properly filtered vacuum or other dust control system is to be used instead.

Section 23 Safety Inspections/Audits

A Safety Inspection Policy has been established for all Wohlsen projects. This policy does not replace the responsibilities of all Wohlsen employees from stopping unsafe acts or reporting unsafe conditions upon observation. Nor does it replace site supervisor's responsibilities to identify these conditions as a matter of daily standard operating procedure. It is intended to allow greater focus on these efforts and provide a set of means and methods to complete the process.

Documented safety inspections must be completed every week. Superintendents, project managers, and project engineers are required to complete two safety inspections per month. The Safety & Health Department will conduct unannounced visits to the project to complete and report Safety Inspections/Site Surveys.

Section 24 Stop Work Policy

Whenever an imminent danger is present to any person, including, but not limited to, Wohlsen employees, subcontractor employees, and third parties, all workers on site have the right to stop work so that hazards are abated or safe work practices are incorporated. For the purposes of this policy, an imminent danger includes, but is not limited to:

- A situation for which the individual is not properly trained or experienced
- A situation for which the individual is not equipped (i.e. safety or personal protective equipment)
- A hazard that is not typical to the individual's work activities or job
- A worker that is unfit for work due to the influence of alcohol or illegal or mind-altering substances
- A danger that would normally stop work in the affected area

Subcontractor's employees are required to report all "stop work" actions immediately to their supervisor and the Wohlsen project manager/engineer and/or safety manager for investigation. During the investigation, the employee(s) involved with the "stop work" action will not leave the site or return to the work activity without authorization.

If the "stop work" action is used for legitimate safety reasons, the individual initiating the action (employee or subcontractor) is protected from discipline, retribution, or discrimination by Wohlsen or their employer.

Section 25 Disciplinary Process

The prevention of accidents, injuries, and illnesses to the site employees is a prime objective of this project. The Wohlsen Project Team is committed to reducing unnecessary human suffering and the accompanying financial burdens, which the site employees could realize as a result of accidents. All project personnel are expected to take an active and constant interest in the prevention of accidents.

No group of safety rules can be so complete that they cover all conditions. For this reason, all site employees are to use good common sense and, in all their actions, take time to think of the consequences to your fellow subcontractor site employees.

Violations of Safety Rules will result in disciplinary action, up to and including termination of employment, based on severity. Every violation requires investigation to determine the root cause on why it happened and what corrective actions are needed to prevent future occurrences. Wohlsen Management will determine appropriate disciplinary action based on

the severity of the violation and results of the investigation. Use of the progressive disciplinary program is at the discretion of Wohlsen Construction and may result in an immediate escalation to a higher step if the violation is deemed high risk and would therefore bypass a lower step.

Wohlsen Construction follows a progressive disciplinary action plan for the following offense(s):

- First Offense: Written Warning
- Second Offense: Three-Day Suspension from all Wohlsen projects
- Third Offense: Termination from all Wohlsen projects

Note: Progressive discipline follows a rolling six-month time frame following the first offense. Violations will be communicated to Wohlsen's Safety Department and logged on a disciplinary action chart. All employees are empowered to report and address safety violations, however written notice of discipline will be issued by Foremen, Superintendents, Project Managers or any other designated Wohlsen employee in a managerial role. Written notices will be done using the Human Resources (HR) "Employee Performance Corrective Action Form" and be reviewed with the employee with a copy placed in their HR personnel file.

Advanced Violation – Violations of Fall Protection, Equipment Guarding or Lockout/Tagout result in Advanced Discipline as described in the "Advanced Discipline Policy Guidelines"

Advanced Discipline for Violations

- First Offense: 5-day suspension from all Wohlsen projects with minimum of 6 hours training* related to safety
- Second Offense: Termination

*Note: Training topics will focus on the violation observed and include additional topics on safety. Training will consist of classroom, online and hands on settings and be overseen by the employee(s) supervisor and Wohlsen's Safety Department.

Advanced Discipline Policy Guidelines:

Fall Protection: While performing construction work, any employee exposed to an elevated fall or fall to a lower level of six feet or more must be protected from falling through the use of fall protection systems. Examples of fall protection systems include, but are not limited to, guardrail systems, personal fall arrest systems, personal fall restraint systems, covers, safety nets, controlled access zones, warning lines, or a combination of these systems. Employees observed working without fall protection while exposed to fall hazards will be in violation of this policy.

- Duties associated with inspection, investigation, assessment or installation of fall protection systems require fall protection systems to be in place when employees performing these tasks are exposed to immediate fall hazards such as a steep sloped roof*, holes or openings, damaged or deteriorated deck/flooring or unprotected sides or edges within six feet.

*Note: A steep sloped roof is defined as having a 4-in-12 (or greater) slope, meaning for every 12 inches of horizontal run, it rises 4 inches (or greater).

Equipment Guarding/Disabling Guards

Equipment guarding/disabling a guard – no employee shall alter, change, or otherwise disable a machine or equipment guard. Employees observed using machines or equipment without the guards in place will be in violation of the policy – regardless if they themselves removed or disabled the guard.

Lockout/Tagout

No employee shall remove or disable a lock or tag placed on a piece of equipment, circuit breaker, valve, or any other energy control device. No employee is authorized to work on live or energized systems. Those systems can include electrical, pneumatic, hydraulic, chemical, or mechanical energy. Employees observed to have removed or disable a lock or tag from an energy control device or have performed work on energized systems without a lock or tag – regardless if they themselves removed or disabled the lock – will be in violation of this policy.

Section 26 COVID-19 Precautions and Protocols

The following are general requirements, but more specific requirements are included in Wohlsen's COVID-19 Mitigation Plan and site-specific Mitigation Plans, which may be updated from time to time, and which are incorporated by reference

- All companies on site are to have COVID-19 mitigation plans for their workers
- All workers on site are expected to follow Wohlsen's COVID-19 Mitigation Plan and any mitigation plans specific to their companies.
- Daily health screening is required
 - All workers must complete the health screen using the QR code or paper form
 - Any "Yes" answers to the screen must be reviewed and the worker may not be permitted on site
- Temperature checks are required
- Workers should not report to the site if they are feeling ill
- Protocols include wearing face masks, eye protection, and gloves
 - Face shields with a Z87 stamp are approved for use in lieu of a mask
- Social Distancing should be followed to the fullest extent possible
- Follow signage and any directives applicable to work patterns
- Subcontractor must identify their Pandemic Safety Officer (PSO)
 - PSO responsible for enforcing compliance and working with Wohlsen
- No eating inside the building and no group breaks without social distancing

- Subcontractors are to establish their own space for drinking water
 - Responsible for preventing sharing of water
 - Responsible for cleaning up bottles
- Hand washing stations are provided on the project site
- Tools, equipment and vehicles shall be cleaned each day
- Subcontractors are expected to be aware of and adhere to travel guidance

Responding to potential or confirmed COVID-19 tests

- Supervisors must assess their employees for signs of illness
- All workers are required to report having symptoms or feeling ill to their Supervisor
- Supervisors are required to notify Wohlsen immediately of any potential cases
 - Companies should interview ill workers to determine close contacts, to extent practical
 - Wohlsen will follow protocols for potential or confirmed cases
 - Quarantine of worker and close contacts following CDC, federal, state, and local health and safety guidelines
 - Notification to Client and Contractors
 - Wohlsen will establish protocol for cleaning and re-opening project
 - Communication between Wohlsen and Contractor on return to work
 - Protocols following positive COVID-19 test will be put into place