INTEGRATED WATER SERVICES, INC.

# SITE SPECIFIC SAFETY PLAN

Project Name: _____

Project Number: _____

Emergency Contact Name: _____ Phone: _____

Project Manager Name: _____ Phone: _____

Superintendent Name: _____ Phone: _____

Superintendent Name: _____ Phone: _____

Safety Steward Name: _____

Location of the Emergency Action Plan: https://iws.support/emergencies

Right to Know Center (Safety Data Sheets): https://iws.support/safety-data-sheets

Project Address: _____

Project GPS Coordinates: _____

Regional Office Address: _____

In case of emergency call: _____

Nearest Hospital Name: _____

Hospital Address: _____

Sheriff/Police Dispatch: _____

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## SITE SPECIFIC SAFETY PLAN

This SSSP was prepared to assist all workers in understanding the health and safety expectations and requirements of Integrated Water Services on this project. Compliance with this Plan is expected and a condition of work. Project managers, superintendents and subcontractors have overall responsibility for the implementation and the execution of this Plan.

On this project site, Integrated Water Services enforces its Safety Program through its Superintendent, Safety Manager and other designees and daily pre-job safety meetings with our own labor force and subcontractor employees stressing the importance of maintaining a safe and productive work site.

Health and safety will always remain a core value for all levels of management, supervision, and workers engaged in worksite activities. Health and safety will never be sacrificed in lieu of schedule, cost, production, or any other component of the work process.

To comply with this philosophy, the project's subcontractors will:

- Thoroughly plan all work activities and operations so they are performed safely, as well as efficiently.
- Effectively communicate the health and safety requirements of this Site-Specific Safety Plan to all subcontractors and their workers through open communications, comprehensive training, assessments, and workplace inspections.
- Develop an understanding, among those in leadership on this project, of their responsibilities and accountability for providing a safe and healthful workplace.
- Plan and coordinate work operations and activities to minimize or eliminate situations which may jeopardize worker's health and safety due to conflicting or simultaneous work operations or activities.
- Communicate to all workers that safety is their responsibility, and they will be held responsible, accountable, and assigned the appropriate authority for their individual safety and the safety of their co-workers.

All workers will incorporate, as a minimum, OSHA 29 CFR 1926 Construction Safety Standards, OSHA 29 CFR 1910 General Industry Standards (as applicable), specific state safety regulations, specific owner requirements, project safety rules, internal employer rules and this SSSP when determining the safe work practices and protection of all workers.

The term "subcontractor" within this document refers to any subcontractor or subcontractor. Integrated Water Services, as the general subcontractor, is referred to by name, the Company, or IWS.

## SAFETY PERFORMANCE

Integrated Water Services expects all workers to execute their work on this project with a proactive commitment to safety at all levels. Each worker should plan their work focusing on protecting themselves from incidents and injuries. The following are actions that each of us can take to improve safety performance on this project:

- Attend and actively participate in toolbox talk meetings.
- Attend and actively participate in pre-job safety meetings.
- Discuss safety in all meetings.
- When you talk about safety, talk about people, not numbers or statistics.
- Ask where the next injury is likely to happen and what can be done to prevent it.
- Complete a JHA for all high-risk activities on a daily basis and have it communicated/acknowledged by all crew members involved.
- Recognize individuals and groups daily for working safely.
- Implement the Good Catch action when you see someone doing something you believe is unsafe. Talk to them about your concern for their safety, not about violating rules or procedures but risking their ability to provide for their families.
- Take responsibility for people's safety that work with you, for you and around you.

- Find ways to express care and concern for people and work to improve the dignity and respect people experience on the project.
- Make and keep promises around safety issues.

Integrated Water Services or their representative will continually monitor and assess each worker and subcontractor for compliance with this SSSP and appropriate regulatory requirements.

Immediate corrective action will be taken to eliminate any safety discrepancy, hazard, at-risk behavior, or violation observed.

## THE FATAL EIGHT LIFESAVING RULES

**Fall Protection:** Any worker (employee or subcontractor) performing duties above 6 feet without proper fall protection is subject to termination on the first offense. Any supervisor who is aware of a worker performing work above 6 feet without fall protection is subject to termination on the first offense.

**Chemicals:** Any worker (employee or subcontractor) handling dangerous chemicals without the proper PPE and/or without a Safety Data Sheet present on the support center for that specific chemical is subject to termination on the first offense. Any supervisor who is aware of a worker performing work without the proper PPE and/or without a Safety Data Sheet present on the support center for that specific chemical is subject to termination on the first offense.

**Electrical:** Any worker (employee or subcontractor) violating the following electrical safety requirements while performing electrical duties or services on an IWS site will be removed from location.

- Unqualified workers performing electrical work who are not under the direct onsite supervision of a journeyman electrician will be shut down and all electrical work will be suspended until a new safe work plan is generated.
- Improper safeguards (PPE, LOTO, exposed electrical parts)
- Improper Grounding
- Inadequate wiring
- Damaged Insulation or other electrical equipment
- Overloaded circuits
- Damaged electrical tools and equipment
- Electrical work in wet conditions
- Contact with underground or overhead energized powerlines

**Pre-Job Safety Meeting and JHA (job planning):** Any supervisor who allows their crew or worker(s) to start the workday without a pre-job safety meeting that reviews and communicates the JHA together as a team will be subject to termination on the first offense. Any worker who is actively working on a jobsite without an active JHA is subject to termination on the first offense.

**Excavations:** Any worker performing duties in an excavation without the proper protective systems as defined in the IWS Trenching, Excavation, and Shoring procedure will be subject to termination. In addition, the direct supervisor of that worker will be subject to termination. Any supervisor that allows excavation work to take place without an active permit and an assigned competent person will be subject to termination on the first offense.

**Confined Spaces:** Any confined space work being performed without the proper permitting and safety equipment as required by the IWS permit will be subject to immediate termination of all entrants and the supervisor(s) of those entrants.

**Open Holes:** Any worker who performs open hole work without the proper barriers or covers in place to protect workers from accidentally stepping into or falling into the holes will be subject to termination on the first offense.

**Driving:** Any worker who is determined to maintain or operate a work vehicle under the following conditions will be subject to termination on the first offense:

- Driving under the influence of a controlled substance or dangerous medication

- Driving without a seatbelt fastened to protect the driver and passengers
- Excessively speeding or reckless driving
- Failure to perform proper maintenance and repairs of their assigned vehicle
- Operating a company vehicle for personal purposes
- Unofficial vehicle use

## DESIGNATED SUBCONTRACTOR COMPETENT PERSON

Each subcontractor will designate a competent person as defined by OSHA 29 CFR 1926.32(f) as "one who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them" in the following areas as appropriate:

The **Scaffold Competent Person** designated to oversee erection and dismantling of scaffolds will be expected to have an above average knowledge of OSHA 29 CFR 1926.450 Subpart L –Scaffolds, and proof of qualification training.

The **Trenching and Excavation Competent Person** designated to oversee digging trenches and excavations will be expected to have an above average knowledge of OSHA 29 CFR 1926.650 Subpart P – Excavations, and proof of qualification training.

The **Fall Protection Competent Person** designated to oversee his company's fall protection plan will be expected to have an above average knowledge of OSHA 29 CFR 1926.500 Subpart M – Fall Protection, and proof of qualification training.

The **Electrical Competent Person** designated to oversee his company's electrical protection plan will be expected to have an above average knowledge of OSHA 29 CFR 1926.400 Subpart K and NFPA 70E – and proof of qualification training,

The **Rigging qualified Competent Person** designated to oversee the rigging of structural steel, concrete panels, materials or other equipment hoisted above the ground will be expected to have an above average knowledge of OSHA 29 CFR 1926.251. Competent Person designated for rigging structural steel shall have an above average knowledge of OSHA 29 CFR 1926.753 Hoisting and rigging, and formal training.

The Safety Competent Person designated to oversee the safety of their employees will be expected to have an above average knowledge of OSHA construction and general industry standards through the practice of experience, application, and training.

As a minimum, each of these competent persons must:

- be proficient in the development and execution of pre-task safety plans, competency plans and risk/severity assessments.
- be trained in the subject and demonstrate competencies by staying current in all required company safety training.
- obtain competency certification from their employer designated competent trainer.
- attend regular safety meetings and instruct workers on the safe work practices and requirements of the respective competency.
- timely submission of all safety-related documents.
- conduct documented pre-job safety planning meetings and communicate with workers to ensure compliance with safe work practices, the Site-Specific Safety Plan and respective OSHA safety regulations.

## WORK-RELATED INJURIES, ILLNESSES, AND INCIDENT MANAGEMENT

An incident is defined as any unplanned or undesired event that results in a work-related injury/illness, property damage, disruption of business, or damage to reputation where the cause was from human errors or omission.

All high potential incidents will be investigated to determine the probable root causes- (s) and steps required preventing a similar occurrence from happening in the future. All subcontractors must fully cooperate with IWS's investigation under the law.

All work-related injuries/illnesses and incidents must be reported to Integrated Water Services immediately and submit a preliminary report within 24 hours of the incident. A final report must be submitted in a timely manner for review and implementation of lessons learned to prevent further incidents from occurring.

## SUBCONTRACTOR SAFETY SUBMITTALS

Prior to beginning work, each subcontractor shall submit a completed Subcontractor Pre-Qualification Questionnaire. This questioner can be found at the safety support center in the SSM tab: https://iws.support/ssm

## VIOLATION OF SAFETY AND HEALTH REQUIREMENTS

Violations of health and safety regulations and project safety rules and policies contained in this plan and/or at-risk behavior(s) will not be tolerated. All identified hazards are to be abated immediately. When a hazard cannot be immediately corrected, a JHA that creates a plan to control the hazard(s) must be completed and submitted. Failure to correct hazards may result in disciplinary actions or suspension of part or all work.

## DISCIPLINARY PROGRAM

Each worker has an individual responsibility to work safely and minimize unsafe actions. Integrated Water Services reserves the right to discipline any subcontractor based on safety violations committed by their employees of any tier, or the subcontractor itself.

Integrated Water Services has established a progressive disciplinary program as outlined below:

- The first offense will result in a verbal warning that will be documented by the supervisor in the form of an email. The employee will be informed via verbal discussion and email that he or she is being issued a verbal warning resulting from a specific infraction, rule, or procedure that was violated and corrective actions that must be taken. The required corrective actions the employee must take to rectify the infraction will be communicated to the employee. Corrective actions may include training, apologies, change of behavior, donning of PPE, etc.
- The second offense will result in a written Safety Violation and additional training. The Safety Violation will be issued by the safety department with a cc going to the HR department. This Safety Violation will describe the unsafe activity or behavior that needs correction, the date by which the correction must occur, and necessary steps the violating employee must take to remedy the situation. The employee receiving the Safety Violation has the right to submit a written rebuttal to the Safety Violation by replying to the email. The employee must sign the Safety Violation to acknowledge their receipt of the Safety Violation. The Safety Violation and any rebuttal will become a part of the IWS employee's permanent employment records.
- The third offense will result in another written Safety Violation followed by termination of employment for IWS employees, and removal of subcontractor subject employee from the IWS worksite. Again, the employee may submit a written rebuttal to the Safety Violation. It is encouraged but not required that the subject employee sign the third and final Safety Violation. The Safety Violation and any rebuttal will become a part of the IWS employee's employment records. Refusal to sign a Safety Violation is grounds for immediate termination or removal from the site.

In the case of serious safety violations such as disregard for the Fatal Eight Lifesaving Rules (FELR), by-passing

guarding, entering a confined space without any safeguarding, malicious or intentional damage to equipment, fighting, or other egregious acts, that put the violator, other employees, or the Company at serious risk of injury or damage, the manager may move the violator directly to the second or third warning level without prior notification. If the violator's actions put him/her or others at risk of immediate danger to life or health (IDLH), the manager has the option to terminate the employee with no further warning.

IDLH safety violations may include, but are not limited to:

- Failure to follow fall protection requirements.
- Removing guard rails and not putting them back in place.
- Working in an unprotected trench greater than 5 feet deep.
- Failure to follow the Substance Abuse Policy.
- Possession of firearms, explosives or dangerous weapons.
- Violation of project security rules and procedures.
- Fighting, horseplay, practical joking or gambling.
- Entering a confined space without following procedures.
- Failure to follow lock-out/tag-out procedures.
- Working on energized circuits without an energized hot work permit.
- Physical altercations, or any sort of harassment (investigated).
- Working with chemicals without access to the safety data sheet (SDS).
- Starting work without first completing a JHA safety meeting with all personnel.
- Leaving unprotected open holes in the workplace.
- Failure to report incidents.

It is impossible to publish every safety rule to cover every circumstance. However, if workers fail to follow safe work practices not covered by this policy, disciplinary actions will be assessed based on Integrated Water Services' assessment of the violation.

## SUBSTANCE ABUSE POLICY

This project is committed to providing a safe, drug-free workplace for all employees. This policy applies to all Integrated Water Services subcontractors, vendors and other third-party employees.

Any worker on the project site who is reasonably suspected of being under the influence of alcohol or a controlled substance shall be tested. subcontractors are responsible for having their workers tested at an approved facility and reporting the results to the Company.

Any worker that refuses to test, stall to be tested, is uncooperative with collectors, or attempts to alter a urine specimen will be considered positive and immediately removed from the project.

It is essential that you and your coworkers are alert and rational while at work. Alcohol, prescribed medications, and unprescribed drugs can all contribute to impairments that hinder our ability to think clearly and to work safely.

If you are impaired for any reason, you should not be at work. If you are suspected of being impaired (under the influence of alcohol and/or drugs), you will be asked to take a drug test. If it is determined that you are impaired while at work, disciplinary action, up to and including termination, could occur.

In addition, the possession, purchase, consumption (use), or sale of a controlled substance or alcohol on company premises or while conducting company business is prohibited.

## SAFETY PLANNING

Job Hazard Analysis

Prior to starting work each day on this project, each worker will participate in a Job Hazard Analysis (JHA) for their scope of work. The JHA must identify and outline each work component or activity, list the potential safety hazards, and provide safety controls, PPE, tools, and equipment that will be implemented and required to

mitigate the recognized hazards and safely complete each activity.

## SAFETY INSPECTIONS

Each subcontractor performing work will be responsible for conducting regular self-safety inspections of their work area, tools, and equipment in accordance with their safety program requirements. The following inspections will be required as applicable to ongoing work activities.

General Worksite Safety Inspections
Each subcontractor will perform a visual general safety inspection of their work area where their employees and subcontractors are working daily.

Daily Inspections
Subcontractors using the below equipment or performing the specific type of work will designate a competent person to inspect and document each day prior to use.

> Scaffolds, trenches, cranes, forklifts, aerial lifts, material handling and hoisting equipment, rigging, ladders and hand and power tools.

Notes: All rigging equipment shall be inspected and certified by the hoisting employer competent person prior to use and at a minimum monthly.

> Each subcontractor who requires their employees to wear personal fall arrest systems (PFAS) shall inspect harnesses and lanyards as required. Workers engaged in steel working activities shall inspect harnesses and lanyards daily. All others shall inspect harnesses and lanyards at a minimum monthly (or as required by manufacturer).

## SAFETY TRAINING

Safety and health training are a requirement and mandatory for all employees and subcontractor workers assigned to this project.

Safety Orientation:
All workers who perform duties on this site shall complete the appropriate safety orientation training and will not be allowed to start work until they have attended. Safety orientations can be found at the following link:
Subcontractors: Subcontractor Safety Orientation https://iws.support/training
Employees: Safety Orientation and Annual Basic Safety Awareness Training: https://iws.support/training

Upon conclusion thereof, all personnel will receive a verification email with their test score and an outline of the training they completed.

## GENERAL SAFETY GUIDING PRINCIPLES

Clean and safe working conditions are essential for achieving an Incident and Injury Free Environment. Everyone must demonstrate and maintain a strong personal desire to think and act safely.

The following Safety Guiding Principles will be used to guide all work activities on this site and to help foster a culture of ensuring that all workers go home safely to their families each day.

- Everyone is responsible for safety and health
- We look out for each other
- Safety is planned into every aspect of our work
- All injuries are preventable
- All recognized deficiencies will be resolved immediately
- We are all responsible for our own safety
- Everyone must complete their assigned training

- Working safely is a condition of employment
- We measure safety performance
- Every worker is responsible to stop at risk conditions

## EMERGENCY ACTION PROCEDURES

A site-specific emergency action plan (EAP) will be written and stored on the safety support center in the Emergencies tab. All employees and subcontractors have been trained on the EAP when they attended the respective safety orientation.

A site-specific emergency action plan (EAP) will be written and maintained on the safety support center. The EAP determines the proper access/egress of emergency equipment and/or personnel into or out of the site in case of emergency.

- Supervisors will direct responders to key locations on the site to assist in an emergency.
- Employees are expected to follow the direction of supervisors and cooperate in any emergency action effort.
- Personnel should evacuate the site in an orderly fashion if instructed to do so by supervisors.
- If you become aware of an emergency or an injury, notify a supervisor immediately.

Personnel are strictly forbidden to discuss project conditions, incidents, or emergencies with the media, press or any person not associated with the project.

## FIRST AID POLICY

In the event an employee is injured on the job, first aid kits are available for the employee to treat their own injuries. First aid kits will be in the vicinity of the work area and contents of the kit inspected when brought on site. Subcontractor Foreman will notify project superintendent or his representative if employees use first aid items. In the event of a serious injury, 911 will be called.

No employee is required to treat another person's wounds. However, in the event "Good Samaritan" assistance is rendered, the exposed employee and victim will be evaluated by a medical clinic or doctor for Blood Borne Pathogens exposure control within 24 hours. The exposed employee will receive general blood borne pathogen training pursuant to OSHA 1910.1030 requirements.

## HEAT STRESS

Workers should consume adequate liquids and take necessary rest breaks to help prevent heat disorders. Water is recommended over carbonated beverages or sport drinks like Gatorade or Red Bull. More information is located in the Heat Illness Prevention procedure located at: https://iws.support/procedures-1

Heat Disorders and Health Effects

Heat stroke: Occurs when the body temperature rises to critical levels, Heat stroke is a medical emergency. Do not send worker home or leave them unattended.

Heat Exhaustion: Symptoms often are non-specific and may be sudden in onset. These symptoms often resemble a viral illness. It is caused by dehydration where a large loss of body fluid causes a slowing of the circulatory system.

Heat Cramps: Usually caused by performing hard physical labor in a hot environment. They are caused by an electrolyte imbalance or by too little or too much salt.

## HAZARDOUS COMMUNICATION/SDS

All subcontractors will submit Safety Data Sheets (SDS) to Integrated Water Services using the SDS Request Form located at the following link: https://iws.support/safety-data-sheets.

Each subcontractor must adequately supervise employees under their direct supervision for proper training and proper precautions prior to the hazardous chemical's introduction to the jobsite. The following information will assist in understanding OSHA Hazardous Communication requirements:

List of Hazardous Chemicals
IWS does maintain a master list of all hazardous chemicals on the project. This list will be maintained at: https://iws.support/safety-data-sheets.

Safety Data Sheets (SDS's)
Each subcontractor must provide SDS for all chemicals they bring to the project site. The SDS must be submitted using the following electronic form: https://iws.support/safety-data-sheets.

Each subcontractor will ensure all containers on the site have proper, up-to-date labels.

Training
Each subcontractor is responsible for the proper training of their employees.

## FALL PROTECTION

All individuals will take all practical measures to eliminate, prevent, and control fall hazards. All work will be planned with the intent to eliminate identified and potential fall hazards. IWS fall prevention policy and OSHA 29 CFR 1926.500 Subpart M govern the requirements to protect workers exposed to falls. Additionally, Integrated Water Service's fall prevention policy requires 100% fall protection when a worker is six (6) feet off the ground or six (6) feet above a lower level and unprotected by guardrails. The use of conventional fall protection systems (passive preferred) shall be utilized to protect workers from falls to lower levels. Workers wearing personal fall arrest systems shall not free fall more than six (6) feet without restraint.

Acceptable fall protection systems include the following conventional systems: guardrails, safety netting, floor and wall hole covers, positioning device systems, fall restraint systems, protection from falling objects and personal fall arrest systems.

Workers exposed to fall hazards shall be uniformly equipped, trained, and given periodic refresher training in fall protection at specific intervals to minimize the adverse effects of accidental falls. Fall protection training records will be maintained in a location so as to be readily available within 4 hours of a request from IWS.

Flat Roof fall protection program: Warning line systems:
There are times when a warning line is necessary. The roofers shall place the warning line as close as six (6) feet from the edge. For the other trades working on a roof the warning line must be 15 feet from the edge. Anyone outside of the warning line system is required to wear personal fall protection.

General fall protection requirements:

Workers are not required to tie off on properly constructed scaffolds, elevated decks and elevated platforms that have proper perimeter guardrail systems. Personal fall arrest systems will be required if the perimeter guardrail system must be removed.

Any subcontractor that creates a floor hole or penetration larger than 2 inches will be responsible for protecting that opening and properly marking it with the words "HOLE-DO NOT REMOVE" or "COVER-DO NOT REMOVE" in languages that the workers speak most prevalently.

## SCAFFOLDS AND AERIAL LIFTS

All subcontractors shall identify a Competent Person responsible for the erecting and dismantling of all scaffolds according to OSHA regulations (29 CFR 1926 subpart L- Scaffolds) and Codes of Safe Practice (Scaffold Industry Association). Records will be maintained for scaffold training and be available for review by any member of the Integrated Water Services team. The Competent person shall submit to Integrated Water Services Superintendent or his representative a fall protection plan for erecting and dismantling scaffolds.

Employees working on scaffolds 6 feet above a lower level shall be protected from falling by either a standard guardrail system or personal fall arrest system. Any use of a personal fall arrest system used on a scaffold shall be approved by a member of the Integrated Water Services team and the IWS safety manager. The subsequent specific scaffold requirements shall be followed:

- All scaffolds shall be erected under the supervision of a competent person and inspected daily. Scaffold tags or equivalent shall be used to document the inspection. Green Tags - Approved ready for use. Yellow Tags - Caution if restrictions are required. Red Tags – Scaffold unsafe do not use. Narrow span scaffolds (Baker scaffolds) are required to be inspected and tagged.

Aerial Lifts

- All subcontractors are required to ensure that their workers are properly trained in the use and operation of aerial lifts, including any manufacturer specific requirements and OSHA requirements of 29 CFR 1926 subpart L.
- Workers must wear their personal fall arrest system while working on any mobile elevated working platforms.

## PERSONAL PROTECTIVE EQUIPMENT

All personal protective equipment (PPE) shall meet applicable standards of the American National Standards Institute (ANSI), American Society for Testing and Materials (ASTM) and properly used in accordance with the manufactures' recommendations. Each employer shall furnish their employees approved PPE that fits to size and provide training in the selection, use and care of such, retraining to be performed as necessary. All workers must maintain their PPE in good sanitary condition, if defective or showing signs of excessive wear PPE must be replaced. All workers entering the jobsite will, as a minimum, wear the following personal protective equipment at all times in the designated work area while on this project (except in office and lunch areas).

Head Protection

An approved hard hat must always be worn.

Eye and Face Protection

- Safety glasses (Z87.1) with side shields must always be worn.
- Workers that wear prescription safety glasses may do one of the following:
  - Obtain prescription safety glasses (Z87.1) with rigid side shields.
  - Wear over- the- glass safety glasses.

In addition, the following eye/face equipment must be worn when performing the following work activities:

| | |
|---|---|
| • Arc welding | Welding hood with proper shading*. |
| • Burning | Burning goggles with proper shading |
| • Grinding or cutting metals | Face shield* |
| • Drilling (rock) | Face shield* |
| • Chemical handling | Face shield* |
| • Molten materials | Face shield* |
| • Corrosive liquids | Face Shield* |

- Concrete pouring Face Shield*

Note: * Safety glasses will be worn in conjunction with face shields and welding hoods.

Foot Protection

Hard soled safety boots/shoes without steel of the toes showing through must always be worn. Safety footwear must conform to ASTM F2412-05 & ASTM F-2413-05.

Work attire

- Shirt sleeves will have a minimum length of 4 inches. No shorts, tank tops, or cut-off shirts are permitted.
- All personnel shall wear reflective vests or high visibility clothing while in the designated work zone.
- Long pants that fit properly around the waist and of a proper length so as not to create a trip hazard
- Long hair must be contained so as not to create a hazard of getting caught.

Respiratory Protection

Site management teams are required to determine if hazards exist that require respiratory protection. If so, the PM or Superintendent must submit a Safety Support Ticket (SST) located at the safety support center in the Forms tab. Complete the SST with as much information as possible and then click Submit. The safety department will follow-up and provide safety support through the entire process to make sure your team is trained, prepared, and they have the right equipment and PPE. Respiratory protection would be required if OSHA permissible exposure limits are exceeded, and no means of engineering controls could be used. If there is any question as to whether respiratory protection is required, please call a member of the HSE team for assistance.

Use of Respirators

Prior to using respiratory protection to protect against an atmospheric hazard, the team must first consider any available and effective primary means of preventing or minimizing exposures by using source controls such as substitution, automation, enclosed systems, local exhaust ventilation or wet methods.

Hearing Protection

Approved hearing protection will be worn as specified in posted areas and while working with or around high-noise level producing machines, tools, or equipment. A good rule to follow is: When you must raise your voice to be heard, you need hearing protection. Exposure to impulsive or impact noise must not exceed 140dB noise level.

Hand Protection

Workers will wear an appropriate level of hand protection as necessary and as determined by the Competent Person to prevent hand and finger injuries.

Additional Protections

Specific activities may require that additional personal protective equipment be worn such as working on energized circuits. Site managers and their Competent Persons shall evaluate the need for additional protection based on their job Hazard Assessment.

Hand and Power Tools

All hand and power tools will be operated, kept in good condition, and regularly maintained per manufacturer's recommendations. Workers working 6 feet or greater above a lower level while using handheld tools and or power tools that may be subject to dropping shall tether those tools or barricade the fall zone area to prevent the tool from hitting unsuspected workers below.

## HOUSEKEEPING AND ORDERLINESS

All IWS projects shall always maintain their work locations in an orderly and clean manner. Daily and regular cleanup of work areas is mandatory for all trades on site. The first indicator of site management competency is determined by the housekeeping and orderliness of their site.

Integrated Water Services Cleanliness Standard

Dumpsters for general trash will be provided at project sites. Subcontractors shall provide trash containers on site for their general trash and debris. All miscellaneous trash generated by workers shall be deposited in a container or in the back of pickup trucks daily. Do not throw bottles, food wrappers, cups, construction waste, broken boards and pallets, or any other types of trash on the floor or ground. Subcontractors, as required by contract, will provide their own dumpsters or garbage receptacles for their specific waste materials, and allocate adequate resources to ensure this housekeeping standard is maintained throughout their time on the project. The project management team shall address this housekeeping standard with all subcontractors prior to beginning work.

General Housekeeping Requirements:

Housekeeping is an important part of our daily work. All materials, equipment, etc. brought on site shall be organized and stored in areas designated by the IWS project team. Trade partners are responsible for organizing material, equipment, and tools so they do not create tripping hazards or impede/block exits. Trade partners are responsible for the daily cleanup of excess material and debris which shall be deposited in appropriate containers throughout the day. When work is completed in a room or area all excess material and debris shall be removed and broom cleaned at the end of each day.

## LADDER SAFETY

Integrated Water Services requires all portable ladders to be rated heavy duty Type 1, 1A, or 1AA. Type II or Type III Ladders (<225 Lbs.) and all types of aluminum ladders are prohibited. Job made ladders shall comply with ANSI A14.4 1979 and 2009 as well as OSHA 29 CFR 1926 Subpart X. Subcontractor Competent Person shall evaluate the use of personal fall protection systems while on ladders greater than 6 feet above the finished floor the ladder sits on.

Refer to manufacturer's specifications for the proper use of all ladders.

## ELECTRICAL SAFETY

The following regulations apply to both temporary and permanent electrical installations used on this Project site. Electricians working on exposed live (50 to 280 volts) parts shall wear the appropriate level of personal protective equipment required under NFPA 70e and as designated by the Competent Person.

- Extension cords used with portable electrical tools and appliances shall be #14 AWG or greater and be three-wire type designed for hard or extra-hard usage. Grounds are never to be removed from the extension cords.
- All flexible cords plugged into a generator with an output of 5KW or greater and all flexible cords plugged into the permanent wiring of the building shall be protected by a ground fault circuit interrupter (GFCI).
- Any replacement plug ends installed on flexible cords shall be UL/FM approved for its intended use. Note: Open construction sites are considered wet locations. UL/FM approved water-resistant replacement plug ends would be acceptable.
- Temporary lights shall be equipped with guards to prevent accidental contact with the bulb. "Red" bulbs will be used to designate exit ways. Temporary lighting circuits shall be permitted within cable assemblies, or within multi-conductor cord or cable of a type identified for hard usage or extra-hard usage.
- Electrical and extension cords or cable are not to be laid on floors, in walkways, etc., unless it is impractical to do otherwise. They should be suspended or protected in such a way as not to block or hang in walkways, doorways, or work areas.
- A weekly cord roll-up program is required on this project. This includes cords of every type, not just extension cords.

- It is Integrated Water Services policy that electrical panels shall be de-energized and locked out prior to being worked on. However, if any subcontractor works on energized circuits is required with panels removed, an "Energized Work Permit" and a safety support ticket in conjunction with a job specific JHA shall be submitted and reviewed by the IWS project team and the Director of HSE. Compliance with NFPA 70E is mandatory. PPE requirements shall comply with NFPA 70E Hazard Risk Classification Table 130.7 (c)(9) and 130.7 (c)(10).
    - Under NFPA 70E, there are only two instances in which an employee can work on live parts. In these situations, a work permit must be completed and approved by an authorized person.
        1. When de-energizing would interrupt essential life support, emergency alarms or ventilation systems.
        2. When the organization can demonstrate that de-energizing the system would introduce additional or increased hazards or that it is infeasible due to equipment design or operational limitations.

## TRENCHING & EXCAVATION SAFETY

The following regulations apply to all trenching and excavation activities on this site: OSHA CFR 1926, Subpart P.

- Any subcontractor engaged in trenching operations deeper than 4 feet shall designate a Competent Person and inform Integrated Water Services team.
- Underground utilities must be located.
- Trenches or excavations greater than 4 feet in depth will be sloped, benched, or otherwise protected from cave-ins as determined by the Competent Person. Sloping, benching or other protective systems are recommended for any trenches and excavations over three (3) feet in depth.
- Protective systems designed to be placed in trenches such as trench boxes must have tabulated data available for review as necessary.
- Spoil piles and other materials will be placed a minimum of 2 feet from the edges of all trenches and excavations.
- In trenches deeper than four (4) feet, locate means of egress, such as ladders or steps or ramps (45-degree slope), so they are no more than 25 feet of travel from anyone in trench.
- The Competent Person must inspect all trenches daily before work begins and after every rainstorm or other hazardous conditions.
- A registered professional engineer must design all excavations and protective systems over 20 feet in depth.
- Completion of the Company "Trenching and Excavation Permit/Checklist" is required for each trench.

## UNDERGROUND UTILITY LOCATIONS

Any subcontractor who digs a trench or excavation shall call the State appropriate 811 service. Before digging, be sure that all utilities have responded to your locate request. The 811 representatives will advise you of the member utility owners notified. It is the responsibility of the caller (the subcontractor responsible for excavation) to contact a utility locating company to have any private lines located.
A copy of the 811-notification form shall be submitted to Integrated Water Services team as part of the completion and acceptance of IWSs Trenching & Excavation Permit/Checklist.
Private or third-party independent locate is required if 811 Service isn't available in the location where the excavation will be occurring.

## CONFINED SPACE

The following regulations apply to all confined space activities on this site: OSHA CFR 1926.1201.

Integrated Water Services team along with subcontractor's Competent Person will identify all confined spaces on the project. Confined Space in Construction shall abide by all the requirements of the standard. Specific requirements for work in a confined space shall be attached as an amendment to this SSSP. As a minimum

before work starts at a project site, each subcontractor must ensure that a Competent Person identifies all confined spaces in which one or more of their employees it directs may work, and identify each space that is a permit space, through considerations and evaluation of the elements of that space, including testing as necessary. Integrated Water Services policy is that all confined spaces by definition as indicated in 29 CFR 1926.1201 will be reclassified as a non-permit confined space based on 1926.1203(e)(1)(i-vi). A Non-Permit Confined Space Permit must be completed before a space can be deemed a Non-Permit Confined Space. Subcontractor's Competent Person shall submit to Integrated Water Services team a confined space entry permit indicating its reclassification as a non-permit confined space. In the event a confined space can't be reclassified as a non-permit space, all requirements under 1926.1203(a-d) shall be followed and the requirements of a Permit Required Confined Space must be satisfied, and the permit must be completed and made readily available at the confined space area. The Integrated Water Services team is required to coordinate confined space rescue with the local fire department in absence of on-site rescue procedures. The IWS confined space permits are located at www.iws.support in the Permits tab.

## FIRE PROTECTION AND PREVENTION

Fire Protection

Temporary fire protection measures, such as fire extinguishers, temporary hose lines, and temporary standpipes are required near hazardous locations and as required by OSHA regulations 29 CFR 1926 Subpart F.

- Fire extinguishers will be the primary means for fire protection, although others may be substituted.
- Any discharge of a fire extinguisher must be reported to the Integrated Water Services team.
- All enclosed buildings under construction shall have the appropriate number of fire extinguishers rated not less than 2A-20B:C placed inside.
- All temporary buildings (shops, field offices, locker rooms, etc.) will have a class ABC fire extinguisher rated not less than a 2A-10B:C
- All spark producing, welding, cutting or flammable storage operations shall require the fire extinguisher rated not less than 2A-20B:C be within approximately 25' from operations.

Fire Prevention

Combustible refuse from construction operations will not be burned or dumped anywhere on the construction site. Such refuse will be removed at frequent intervals, as required. Storage of large quantities of construction debris will be placed in metal dumpsters.

Compressed gasses will be:

- Stored with valve caps securely fastened when not attached to a regulator.
- Always secured upright, including when transported in vehicles.
- Fuel and oxygen cylinders will be separated by 20 feet for greater when not in use or separated by a not less than a 5' fire rated (one-half hour) wall.
- Empty cylinders shall be stored separately from full cylinders.

- Oily rags and waste are to be stored separately in metal containers fitted with self-closing lids.

Flammable Liquid Storage and Dispensing

Flammable liquids will be:

- Stored outside and no closer than 20 feet of any structure or inside a properly constructed storage container.
- Stored in approved metal safety cans and marked to indicate its contents.
- Not more than 25 gallons stored inside any trailer or building.
- Posted with "No Smoking" signs.
- Outside storage areas must be kept free of other combustible materials.
- Gasoline or diesel storage tanks will be double walled and protected from contact by mechanized equipment.
- At fuel dispensing points, the following is required:
  - Fire extinguisher rated not less than 20 B-C located within 75 feet of fueling point.
  - "No Smoking" signs posted.

- Self-locking fuel nozzles are prohibited.
- Spill kit stored nearby.

## HOTWORK PERMIT REQUIREMENTS

A Hot Work Permit is required for any temporary operation involving open flames or producing heat and/or sparks. This includes, but is not limited to brazing, flame cutting, grinding, soldering, torch applied roofing and welding. Hot work permits will be issued by the Integrated Water Services management team and will be filled out by the subcontractor engaged in hot work operations in an enclosed building/structure or outside of the designated hot work/welding area.

- All provisions of the Hot Work Permit will be followed including fire watch personnel. Hot Work Permits can be issued for the duration of the hot work but not to exceed the work shift.
- Refer to the IWS Hot Work Permit

## EQUIPMENT AND VEHICLES

- Heavy equipment (cranes, forklifts, dump trucks, excavators/backhoes, man-lifts, etc.) used on this project will be inspected prior to use and comply with applicable OSHA and ANSI standards as well as manufacturers documentation.
- Seat belts shall be worn on all powered equipment.
- Windshields will be free from cracks or other visible damage.
- Vehicles and equipment with an obstructed view to the rear must have an audible backup alarm or a flagman must be used.
- No equipment or vehicle will be used to transport personnel unless it is specifically designed to do so.
- Equipment operators are responsible for inspecting their equipment daily to verify it is working properly.
- Equipment operators will possess the required training, certification, and licensees as required by law for the equipment that they are required to operate. All forklift operators shall have a valid operator's license, a copy of which must be submitted to the Integrated Water Services team.
- If operating a forklift, backhoe, or similar piece of equipment in a public right-of-way (ROW), a valid State driver's license is required and must be on file with the Integrated Water Services HR department.

## CRANE SAFETY, RIGGING AND HOISTING OPERATIONS

Any crane work happening on this Project Site shall adhere to the requirements of 29 CFR 1926.1400 Cranes and Derricks in Construction and ASME B30. All crane operators shall provide required documentation such as annual inspection certification, operator's license, and signalman training.

Each qualified crane operator will be responsible for conducting a detailed daily inspection of their crane and ensure findings are properly logged in a written daily report and reported to the crane owner and IWS.

Mobile Cranes

- No crane will be brought onto the project without a current annual inspection and applicable load charts.
- Crane operators will perform daily crane safety inspections. Crane operators are to complete the daily crane inspection as required by their employer.
- All cranes will be equipped with an anti-two block device. Hooks will be equipped with safety latches.
- The crane operator/supervisor shall designate a qualified person to monitor all rigging. All rigging will be inspected daily and before each shift. A daily rigging safety inspection must be completed before rigging is used.
- The crane manufacturer's operating manual, instructions and load charts for a specific crane will be used to determine the safe operation of all cranes.
- All crane operators must be certified by the National Commission on Certification of Crane Operators (NCCCO) or equivalent. This rule applies to subcontractors as well as IWS employees. Exception: cranes mounted on delivery trucks that unload outside, onto the ground.

- The supervisor shall ensure that crane operators meet legal and crane owner requirements. After initial qualification, the project superintendent or their designee shall closely monitor until the operator's capability is established.
- The ground where the crane will be set up must be solid and able to support the weight of the loaded crane. Determine if underground utilities exist near where the crane will be set up.
- Cranes will be set up level with outriggers fully extended or set per the manufacturer's recommendation for particular lift configuration. All tires should be clear of the ground.
- Cribbing or mats under outrigger pads should be of sufficient size and properly placed to ensure adequate soil bearing.
- Tag lines shall be used when needed to control the load.
- The entire swing radius of the rear rotating superstructure of all cranes must be barricaded to prevent crushing injuries.
- The load path shall be barricaded to protect workers from overhead hazards.
- Loads shall be routed to minimize exposure to workers.
- Before a lift, determine the load weight and load capacity. A designated qualified person will determine the load weight. Refer to the shipping weight or have the equipment or machinery assembly weighed. Calculate all structural loads and determine the center of gravity.
- Position the crane so there is a minimum swing and load path clearance of two feet. Cranes and their loads shall not be operated within 20 feet of electrical lines. Increased clearance is required for higher voltage lines. When working near electrical sources (overhead lines or lightning), the crane should be grounded.
- Crane operators are to know the weight of the load they are lifting.
- A written lift and rigging plan are required for any lift where:
  - The load is greater than 75% of the crane capacity as configured for the lift.
  - Two cranes are used.
  - The Project Manager/Superintendent or Safety Director determines the lift to be non-routine.

<u>Tower Cranes</u>

- Tower cranes must be fitted with limit switches and alarms when operating in close proximity to other tower cranes (and other equipment), public interface and any other structure that could compromise safe operations.
- Cranes must be installed, erected, adjusted, climbed, inspected, maintained, and dismantled in accordance with the manufacturer's requirements. Detailed planning must be submitted for IWS's review at least two weeks prior to performing activity.
- Tower cranes require a competent engineer to design the crane base; complete any interim checks during installation; provide approval for the crane to be installed; and provide written confirmation that the base is fit for purpose.
- Tower base must be kept free of debris and standing water. Any excess power cords must be rolled up and elevated.
- Effective measures must be implemented to prevent cranes from coming into contact with overhead power lines or underground services, other cranes, equipment or structures. Crane to crane communication must be established between any cranes (or other equipment) that could be operating within physical reach of one another. Daily operators' coordination is required.
- All Tower cranes must be equipped with a functional Safe Load Indicator (LMI) at all times.
- Tower cranes must be inspected and deemed operationally safe by a qualified technician after any relevant weather- related event (hurricanes, major storms, earthquakes, or lightning strikes) any incidents and major repairs.

<u>Rigging</u>

- Special attention needs to be taken when wind speeds exceed 20mph. Such lifts will only be made at the discretion of the crane operator, project superintendent, and safety director and they must follow Crane manufacture's recommendations.
  - Lower crane booms and raise the hook when appropriate due to high winds.
- All loads to be slung, lifted, or transported must have no uncontrolled movement or loss of the load. This can involve redundant slinging or secondary containment for small objects.

- All lifting gear and tackle (e.g., chains, wire ropes, kibbles, slings, and rubbish removal skips) must be inspected before use and must be structurally sound, fit for purpose and designed for lifting (with certified lifting points and the rated capacity/safe working load clearly displayed).
- Tag lines shall be used when needed to control the load.
- Objects transported through site must be adequately restrained to prevent uncontrolled movement forwards, rearwards, upwards or sideways.
- Slinging methods must manage any expected dynamic load forces (e.g. wind, sudden crane halt).
- Deliveries where the load has the potential to fall/roll when unshackled must be inspected by a Competent Person, i.e. Rigger/Signal Person or equivalent and restrained before removal, e.g. chocked or slung with hoisting/lifting gear.
- The requirement for exclusion zones for lifting/hoisting operations must be identified and included in the crane lifting plan or PtP.
- All riggers must possess a valid qualification card that is available for inspection by IWS at all times

Signalman Training and Qualifications

Employers of the signal person shall ensure that each signal person meets the qualification requirements contained in 29 CFR 1926.1419 Signals – General Requirements.

- A crane operator should always move loads according to the established code of signals and use a signaler.
- Only a qualified person should give signals to the crane operator. The signal person shall:
- Know and understand the type of signals used. If hand signals are used, the signal person shall be designated in writing.
- Be competent in the application of the type of signals used.
- Have a basic understanding of equipment operations and limitations, including the crane dynamics involved in swinging and stopping loads and boom deflection from hoisting loads.
- The crane operator and signal person shall be able to effectively communicate the language used.
- The signals used (hand, voice, audible, or new) and means of transmitting the signals to the operator (such as line of sight, video, radio, etc.) shall be appropriate for the site conditions.
- If radios are used to signal crane operators, the radio must have a dedicated channel.
- Hand signal charts shall be either posted on the equipment or readily available at the worksite or via electronic means.
- There should be only one designated person at a time giving crane signals.
- A crane operator should move loads only on crane signals from one person.
- A crane operator must obey STOP signals no matter who gives it.
- The person giving crane signals must be in clear view of the crane operator.
- The person giving crane signals must have a clear view of the load and the equipment,
- The person giving crane signals must keep people outside the crane's operating area. Any request or questions should be addressed to the signaler.
- The person giving crane signals should never direct a load over a person.

## DEMOLITION

- Demolition plans shall follow OSHA 29 CFR 1926 Subpart T.
- Prior to the start of any demolition work, an engineering survey of the building or area to be demolished is required to determine the condition of the area. Debris and material shall not be dropped through walls, floor holes, windows, or other elevated work areas without the area below being barricaded and proper signs posted.
- Debris chutes shall have a substantial gate at all elevated openings.
- Integrated Water Services may require the demolition subcontractor to submit a site-specific fall protection plan if the work requires the removal of exterior walls and or flooring.

## CONCRETE AND MASONRY

- Free standing masonry walls over eight (8) feet in height will be adequately braced to prevent collapse. Limited access zones will be established as required by OSHA 1926, Subpart Q, to protect workers from the hazards associated with collapsing masonry walls.
- All rebar dowels, electrical conduits or similar items which are considered a "potential impalement hazard" shall always be capped (protected). This includes vertical and horizontal impalement hazards.
- Refer to Section on SILICA for specific requirements.

Pre-Cast Concrete

- The inspection and supervision of all rigging and hardware must be performed by a Competent Person.
- Never move pre-cast members over another worker.
- 100% fall protection is required of all workers involved in the setting or connection of pre-cast members
- No workers will use their hands to reach under a pre-cast member to adjust a shim or bearing pad.

## STEEL ERECTION

The steel erection subcontractor shall submit a written steel erection plan to the Integrated Water Services team prior to any work being performed. The plan must be comprehensive and include all aspects of the erection process, including but not limited to storage/staging of materials, equipment for hoisting materials, routes for lifting operations, critical lifts, rigging procedures, connection procedures, erection bridging procedures, stability requirements, fall protection requirements, decking procedures and proper training of workers. Steel erection procedures shall follow OSHA 29 CFR 1926. 750 Subpart R – Steel Erection standard or any supplemental requirements required by Integrated Water Services. The following requirement shall be incorporated into the plan:

- 100% continuous fall protection for heights six (6) feet or greater above a lower level. Workers engaged in steel erection activities to include connecting, bolt-up and decking are not exempt from the project's 100% fall protection requirements.
- During skeletal steel erection, a tightly planked temporary floor shall be maintained within two (2) stories or thirty (30) feet, whichever is less, below and directly under that portion of each tier of beams on which any work is being performed.
- During structural steel assembly, a safety railing of wire rope (at least 3/8" dia.) or equivalent shall be installed. The top railing should be forty-five (45) inches and a mid-railing at twenty-two (22) inches above the deck along all open sides including stairway landings and elevator shafts. The railing must support two hundred (200) lbs. of downward force and not deflect below thirty-nine (39) inches and shall not deflect outward beyond the edge of the floor. Flagging must be placed no more than every six (6) feet apart using a hi-visibility material.
- When placing structural steel members, the load shall not be released from the hoisting line until the member is secured by at least two bolts or the equivalent at each connection, drawn up wrench tight.

## SILICA

An exposure control plan must be developed and submitted to the IWS management team prior to beginning any work that encounters or generates silica dust. The exposure control plan shall adhere to the requirements of 29 CFR 1926.1153 Respirable crystalline silica. If respiratory protection is required by this section, the subcontractor shall institute a respiratory protection program according to 29 CFR 1910.134.

- Workers that perform any of the following work tasks will be protected from exposure to crystalline silica dust:
    - Abrasive blasting using silica sand as a blasting medium.
    - Abrasive blasting of concrete regardless of the type of medium.
    - Sawing, hammering, drilling, grinding, sanding, or chipping of concrete, rock or masonry products.
    - Heavy equipment and utility vehicles used to fracture or abrade silica containing materials, i.e.

rock ripping, grading, demolition, fracturing
    - Dry sweeping or compressed air blowing of concrete, masonry, rock, or sand dust.
- Workers exposed to silica dust will receive training on silica hazards and protection methods.
- Examples of acceptable engineering controls are:
    - Substitute blasting medium for less hazardous material with 0% silica.
    - Dust collection systems shall be equipped with a commercially available shroud and have a filter with 99% or greater efficiency and a filter-cleaning mechanism.
    - Wet saw systems equipped with integrated water delivery system that continuously feeds water to the blade or cutting surface.
    - Wet sweeping, HEPA-filtered vacuuming shall be used to clean up materials and debris where crystalline silica may be present.
- Do not use respirators as the primary means of preventing or minimizing exposures to airborne contaminants. Instead, use effective source controls such as substitution, automation, enclosed systems, local exhaust ventilation, wet methods, and good work practices as indicated in 29 CFR 1926.1153 Respirable crystalline silica.
- Do not eat, drink, or use tobacco products in areas where crystalline silica dust is present. Always wash hands and face before eating, drinking, or using tobacco products.

## ENERGY ISOLATION/LOCK OUT TAG OUT

This IWS Lockout Tagout - Energy Isolation Procedure located at www.iws.support in the Procedures tab establishes the minimum requirements for energy isolation and lockout of energy producing systems whenever maintenance or servicing is done on energy producing or energy consumption systems. It shall be used to ensure that the system is stopped and isolated from all potentially hazardous energy sources, and locked out before anyone performs any servicing or maintenance where the unexpected energization or start-up of the system could occur.

- Refer to the IWS Lockout Tagout - Energy Isolation Procedure located at www.iws.support in the Procedures tab: https://iws.support/procedures-1

## CODE OF CONDUCT /WORKPLACE VIOLENCE

Nothing is more important to Integrated Water Services than the safety and security of its employees and partners. Threats, threatening behavior or acts of violence against anyone on Company property or project sites will not be tolerated. Violations of this policy will lead to disciplinary action (up to and including termination) and/or removal from premises.

In carrying out Integrated Water Services policies, it is essential that all personnel understand that no existing Integrated Water Services policy, practice, or procedure should be interpreted to prohibit decisions designed to prevent a threat from being carried out, a violent act from occurring, or a life-threatening situation from developing.

All workers are responsible for notifying their supervisor and Integrated Water Services team of any and all threats or unusual behavior, which they may have witnessed, received or have been told that another person has witnessed or received.

This policy also requires all individuals who apply for or obtain a protective restraining order, which lists company locations as being protected areas to provide such to the IWS HR or Safety Director. Integrated Water Services understands the sensitivity of the information requested and will respect the confidentiality thereof.

## PROTECTING EMPLOYEES IN THE WORKPLACE

Protecting all employees' safety and well-being is of utmost importance to maintaining a positive, productive work environment and culture. This commitment includes protecting IWS field and office employees from harassment, threats, and violent behavior, and extends to our subcontractors, customers, and anyone present at one of our job sites or offices. Being a good steward of your own personal safety and the safety of others

involves knowing the risk factors, reducing any known risks, and taking pro-active approaches to help yourself and others stay safe and free from harassment, threatening or volatile behavior in any form.

Risk factors for working on IWS sites:

- Working late at night or early morning hours
- Working during non-daylight hours
- Working alone or with a limited number of co-workers
- Uncontrolled access to a workplace
- Areas of known security concerns
- Parking areas

Reducing the risks:

- Remove yourself from any contentious situation immediately and do not confront the workers or engage in conversation
- Note who the workers are and or what job they were doing
- If harassed in any form, contact your supervisor or a co-worker immediately and then report the incident to the HR or Safety department. If you wish to by-pass your immediate supervisor, you may reach out to the HR or Safety department or any member of the management team
- Report all safety concerns to a member of the IWS HR or Safety team or VP or any member of the management team
- You can raise concerns or make reports without fear of reprisal

Practical tips for helping yourself and others stay safe at work:

- Always be aware of your surroundings
- Inform your co-workers when working alone
- Inform your co-workers when you intend to enter and return from the project site
- Park your vehicle near or under a light close to windows if possible
- Keep your cell phone handy and ensure it is charged
- Keep phone numbers of project or department team members in your cell phone's favorites file
- Be aware of groups congregated in and around isolated areas
- Do not stay in isolated areas too long
- Keep doors to isolated spaces open

If you believe you are being harassed either through verbal communication, body language, or gestures, report the incident immediately to your supervisor and the HR or Safety department. IWS will investigate and take prompt action against any worker(s) or individual(s) who harass employees in the workplace or the general public near a project site. Threats, hostile behavior, or acts of violence against employees, subcontractors, visitors, guests, or other individuals by anyone on company property or projects sites will not be tolerated. Violators will be subject to disciplinary action up to and including termination of employment. You may view the Company full policy on harassment and sexual harassment in the employee handbook. If you have concerns about the safety and security of an IWS job site or office, please contact a member of the HR or Safety department.