



MULTI-EMPLOYER WORKSITES

Integrated Water Services, Inc.
(the Company)



Purpose

This communication is provided to all Company employees and subcontractors and their employees as a means to communicate the safe planning, hazard identification, hazard remediation measures, and safety cooperation efforts required of all workers on a Company site.

It is essential that employees and subcontractors alike become familiar with the safety protocols in place at Integrated Water Services, including the location of policies and procedures, emergency action plans, emergency action plans, safe work permits, and other pertinent safety resources that are located at the safety support center www.iws.support. All personnel must adhere to the published Company safety requirements as a means to ensure safe working conditions.

If you have any questions related to your duties or safety protocols during the course of performing your employment duties at a Company worksite, please do not hesitate to reach out for assistance from your site supervisor or Company safety personnel.

Thank you for contributing to our commitment to providing safe working conditions at all times in support of our goal of zero accidents.

Scope

This program applies to all workers, employees, and contractors alike. The goal is to ensure the safety of all workers on a Company worksite.

When work is performed by a subcontractor on a company site, the contractor's written safety program shall take precedence for their employees. However, subcontractors may adopt this procedure for their use.

If you have any questions about our safety program, please do not hesitate to ask questions of your supervisor or our safety department. We are committed to creating a safe working environment for everyone involved with our company and appreciate your cooperation in helping us achieve this goal.

A Multi-Employer Worksite

Integrated Water Services recognizes that in most cases, Company controlled worksites will be multi-employer worksites. On multi-employer worksites, more than one employer is responsible for preventing and controlling hazardous conditions. The process for recognizing and understanding the role each employer plays in controlling hazardous conditions is a straightforward two-step process:

Step One. The first step is to determine whether you as an employer are a creating, exposing, correcting, or controlling employer. The definitions below explain each. Remember that an employer may have multiple roles. Once you determine your role as an employer, go to Step Two to determine your level of responsibility in controlling hazardous conditions.

Step Two. If you as an employer fall into one of these categories, you have obligations with respect to OSHA requirements. Step Two communicates your required actions to meet those obligations. The extent of the actions required of employers varies based on which category applies.



A Creating Employer

Definition: An employer whose actions or employee's actions have a potential to cause or do cause a hazardous condition.

Actions Required: Employers and employees must not create hazardous conditions in their workplace, nor should they allow hazardous conditions to persist once they have been recognized. An employer or an employee that does so is in violation even if the only employees exposed are those of other employers at the site.

An Exposing Employer

Definition: An employer whose own employees are exposed to a hazard.

Actions required: If the exposing employer creates a hazardous condition, it is in violation as a creating employer. If the hazardous condition was created by another employer, that employer is the creating employer as well as the exposing employer if it (1) knew of the hazardous condition or failed to exercise reasonable diligence to discover the condition, and (2) failed to take steps consistent with its authority to protect their employees. If the exposing employer has authority to correct the hazard, it must do so. If the exposing employer lacks the authority to correct the hazard, it is still in violation if it fails to do each of the following: (1) ask the creating employer to correct the hazard; (2) inform its employees of the hazard; and (3) take reasonable alternative protective measures. In certain circumstances (e.g., imminent danger situations), the exposing employer is also in violation for failing to remove its employees from the job exposure to avoid the hazard. In summary, don't allow your workers to be exposed to a hazardous condition and if the creating employer won't resolve the hazardous condition, the employees must be moved away from the hazard.

A Correcting Employer

Definition: An employer who is engaged in a common undertaking, on the same worksite as the exposing employer and is responsible for correcting a hazard. This usually occurs where an employer is given the responsibility of installing and/or maintaining safety and/or health equipment, devices, or PPE.

Actions required: The correcting employer must exercise reasonable care in discovering and preventing the hazards and meet its obligations of correcting known or assumed hazards.

A Controlling Employer

Definition: An employer who has general supervisory authority over the worksite, including the power to correct safety and health violations itself or require others to correct them. Control can be established by contract or, in the absence of explicit contractual provisions, by the exercise of control in practice.

Actions required: A controlling employer must exercise reasonable care to prevent and detect violations on the site they control. The extent of the measures that a controlling employer must implement to satisfy the duty of reasonable care is less than what is required of an employer with



respect to protecting its own employees. This means that the controlling employer is not normally required to inspect for hazards as frequently or to have the same level of knowledge of the applicable standards or of trade expertise as the employer it has hired as a subcontractor.

Factors Relating to Reasonable Care: Factors that affect how frequently and closely an employer must inspect to meet its standard of reasonable care include:

- The scale of the project.
- The nature and pace of the work, including the frequency with which the number or types of hazards change as the work progresses.
- How much the controlling employer knows both about the safety history and safety practices of the employer it controls and about that employer's level of expertise.
- More frequent inspections are normally needed if the controlling employer knows that the other employer has a history of non-compliance. Greater inspection frequency may also be needed, especially at the beginning of the project, if the controlling employer has never before worked with this other employer and does not know its compliance history.
- Less frequent inspections may be appropriate where the controlling employer sees strong indications that the other employer has implemented effective safety and health efforts. The most important indicator of an effective safety and health effort by the other employer is a consistently high level of compliance. Other indicators include the use of an effective, graduated system of enforcement for non-compliance with safety and health requirements coupled with regular jobsite safety meetings and safety training.

Evaluating Reasonable Care: In order for an employer to exercise reasonable care in preventing and discovering violations, the employer should:

- Conduct periodic inspections of appropriate frequency (frequency should be based on the factors listed above).
- Implement an effective system for promptly correcting hazards.
- Communicate other employer's noncompliance with safety and health requirements with an effective, graduated system of communication and follow-up inspections.

Conclusion

Integrated Water Services' Corporate Health and Safety Policy is built on a foundation of core beliefs that guide our actions and decisions. We firmly believe that environmental, health, and safety (EHS) performance must always take priority over other business or client demands. We are committed to embedding concern for employee health and safety into every aspect of our work, from the design phase to the decisions we make.

We empower each employee with personal responsibility for their own safety, as well as the safety of their colleagues and subcontractors. Continuous improvement is at the heart of our EHS culture, and we rely on feedback and experience to refine and enhance our approach to safety, ensuring that we are always moving forward. But when it comes to safety, we are never satisfied, constantly seeking new and innovative ways to reduce safety incidents through focusing on "leading indicators," proactively avoiding incidences BEFORE they happen, rather than measuring performance on "lagging safety indicators" AFTER the fact.



At Integrated Water Services, we believe that EHS incidents are preventable, and we are proactive in our policies, practices, and decision-making to minimize risks. Worksite employers are responsible for ensuring that their employees have the necessary knowledge, skills, and equipment to protect themselves and others. We hold ourselves to a higher standard than mere compliance with regulations and strive for excellence in all areas of our business.

We recognize that every task we undertake has an impact on the welfare of our employees, contractors, visitors, clients, and the communities in which we operate. As such, we are committed to protecting the well-being of our employees around the clock, both on and off the job. At Integrated Water Services, we believe that a strong EHS culture is essential to achieving our business objectives and delivering value to our clients, while ensuring the safety and well-being of our employees.