

As a Home Builder, we rely on subcontractors, trade partners, vendors and suppliers to construct our homes. These individual companies are required to have their own safety and health programs for the safety and health of their employees and any subcontractors who may work under them. We will not dictate the elements of their safety and health programs, but we require that those programs cover all areas of exposure for their work area and are in compliance with local, state and federal laws as applicable.

We require them to maintain the safety of their workers on our jobsites at all times. This is part of their contractual requirements as well as industry practice. In addition to those requirements, each subcontractor on our jobsite shall fill out the following forms:

- Subcontractor Safety Agreement: this agreement describes some of the guidelines subcontractors need to follow on the jobsite. This section is per OSHA standards.
- Subcontractor Fall Protection Checklist: as fall protection is the number 1 cause of death in the construction industry, this form details the requirements to make sure the subcontractors are planning fall protection on the jobsite.
- Subcontractor Safety Violation Reprimand/Fine Policy: this policy is used to reprimand any subcontractor who is not following safety and health rules while on the jobsite. It is important for reprimands to escalate. Unsafe subcontractors should not be allowed to work on the jobsite. The reprimand and fine policy is listed below.

These forms should be filled out and returned to the superintendent or designee prior to starting work on the jobsite.

Subcontractor Safety Violation Reprimand/Fine Policy

Superintendents should monitor the subcontractor work activities on the jobsite. If violations of safety and health guidelines or OSHA standards are found, the following policy should be followed:

This jobsite requires workers to work safe at all times. If any subcontractor refuses to follow safe work practices and guidelines or OSHA standards, they shall be reprimanded and the following action should be taken:

1. **First Offense:** the worker shall stop what they are doing and correct the issue immediately. The superintendent should document this violation along with the corrective action taken on a safety violation form. The superintendent should request from the subcontractor management that the worker be re-trained in the area of concern.
2. **Second Offense** – the worker shall stop what they are doing and correct the issue immediately. If the same worker is caught for the second time performing the same or substantially similar violation they should be kicked off the jobsite for the day or fined based on the discretion of the superintendent. The superintendent should document this violation along with the corrective action taken on a safety violation form. The superintendent should request from the subcontractor management that the worker be re-trained in the area of concern.
3. **Third Offense** – the worker shall stop what they are doing and correct the issue immediately. If the same worker is caught for the third time performing the same or substantially similar violation they should be kicked off the jobsite for at least 3 working days or fined based on the discretion of the

superintendent. The superintendent should document this violation along with the corrective action taken on a safety violation form. The subcontractor’s management will need to issue a plan on preventing the violation from occurring again to the superintendent prior to allowing the worker to return to the jobsite.

SAFETY VIOLATION FINE POLICY

The superintendent will determine the reprimand method to be used. Subcontractors can be fined or kicked off the jobsite. If the superintendent decides to issue fines, the following fines should be issued.

<u>Hazard Area</u>	<u>2nd Offense</u>	<u>3rd Offense</u>
Fall Protection	\$250 (per violation)	\$750.00 (per violation)
Guardrails	\$100 (per violation)	\$300.00 (per violation)
Personal Protective Equipment	\$100 (per violation)	\$300.00 (per violation)
Excavation / Trenching	\$100 (per violation)	\$300.00 (per violation)
Electrical Hazard	\$100 (per violation)	\$300.00 (per violation)
Scaffolding	\$100 (per violation)	\$300.00 (per violation)
Tools / Equipment	\$100 (per violation)	\$300.00 (per violation)
Crane / Rigging / Signaling	\$100 (per violation)	\$300.00 (per violation)
Housekeeping	\$100 (per violation)	\$300.00 (per violation)