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It is our company’s policy to perform its work in the safest manner possible, consistent with safe work practices, and according to all governing laws and regulations. The safety and health of our employees, subcontractors and others who may be in our work areas is paramount. This program has total management support. Managers at every level are charged with the task of translating this policy into positive and productive action.

This SAFETY & HEALTH PROGRAM, as revised from time to time, contains company safety and health policy and rules for the jobsite. They represent a wealth of practical experience, and have been tested on many successful projects. Putting these procedures to work can protect the well-being of our employees; preserve vital company resources; and minimize financial losses caused by accidents. We also require all subcontractors, trade partners, suppliers and vendors to develop, implement and follow their own safety and health program, including providing the proper competent person (s) for the specific task they are responsible for. Therefore, as a condition of employment by the company each employee is required to study, understand and abide by these procedures. This SAFETY & HEALTH PROGRAM is provided for the sole purpose of improving safety and health conditions in our company, and is NOT to be considered as an agreement or contract for employment.

This SAFETY & HEALTH PROGRAM follows the [Occupational Safety and Health Administration \(OSHA\) Recommended Practices for Safety and Health Programs](#), which provide for the prevention of jobsite injuries and illnesses, improved compliance with laws and regulations, reduction of costs, including significant reductions in workers' compensation premiums, engagement of workers, enhancement of company social responsibility goals and increasing productivity and enhance overall business operations

Our program contained in this program provides ways to systematically identify, evaluate, and prevent or control jobsite hazards, specific task hazards and hazards which could arise from operations. This SAFETY & HEALTH PROGRAM is not a one-time plan, but is a dynamic program that is always open to improvement.

Safety is as critical to our company's operations as planning, scheduling and billing. Further, the company believes that accidents are preventable, and that it is up to each of us to ensure that we practice safety as a routine part of our daily work. One of our safety goals is to have the best safety and health conditions possible in the jobsite. To achieve that goal, we must first have a good attitude about safety. Then we must THINK SAFETY and WORK SAFELY.

Sincerely,

Name _____ Date _____

COMPANY SAFETY GOALS

Managers and supervisors are accountable to the upper management of this company for the successful achievement of targeted Company safety and health goals. The company's jobsite safety and health goals are:

1. Have the best safety and health conditions possible in the jobsite.
2. Minimize all injury accidents and health impairment.
3. Prevent any major fires, vehicle accidents or property damage losses.
4. Zero permanent disabilities.
5. Zero environmental accidents.
6. Zero fatalities.

These goals are implemented to control and prevent construction site failures which cause fatalities, injuries, illness, equipment damage, fire, and damage or destruction to property.

No phase of our company's operations is more important than accident prevention. Each employee is expected to be aware of and actively pursue safety goals. There is only one way to do a job properly - THE SAFE WAY!

COMMITMENT

Management—the personal safety and health of each employee of this company is of primary importance. The prevention of occupational injuries and illness is so important that it is to have precedence over operating productivity whenever necessary. The company will, to the greatest degree possible, provide safe mechanical and physical jobsites, provide for employee safety training and implement safe work practices that will make our work areas safe places to work. The company is committed to a safety and health program that will reduce the number of injuries and illness to a minimum, not merely in keeping with, but hopefully surpassing, the best experience of similar industry operations.

Employees—this SAFETY & HEALTH PROGRAM conforms to the best practices of organizations in our industry. To make the program work, all company employees must have good attitudes about preventing injury and illness. Success requires cooperation between each employee and his or her co-workers. With cooperative effort and positive attitudes, the SAFETY & HEALTH PROGRAM will benefit all the employees of the company, subcontractors, trade partners, suppliers, vendors, our homebuyers, our visitors and others in our communities. Each employee is required, as a condition of employment with the company, to read, understand and sign the EMPLOYEE COMMITMENT TO WORK SAFELY, which is found on the last page of the Section 8: Employee Safety and Health Handbook.

ENFORCEMENT

General—all employees must understand that THE FIRST AND MOST IMPORTANT WORK RESPONSIBILITY IS TO BE RESPONSIBLE FOR ONE'S OWN SAFETY! Disregarding safety and health guidelines provided for one's own benefit is not only dangerous to oneself, but also to those with whom one works. An employee who disregards safety is a significant liability to the company. The company safety guidelines apply to all employees of the company, without exception. The company safety guidelines will be enforced by management. Warnings and reprimands will be issued for known violations of the safety guidelines as soon as the infraction is observed, and it will become part of an employee's work record.

Reprimand Policy—the following steps should be taken if an employee is found in violation of safety and health guidelines and OSHA standards:

1. **1st Offense:** Employee will be removed from hazardous situation immediately. Supervisor will formally write up employee using the employee disciplinary action form. Supervisor will re-train employee and document this training on the disciplinary action form. Future discipline will be discussed with employee.
2. **2nd Offense:** Employee will be removed from hazardous situation immediately. If an employee is found in violation of a safety and health guideline or OSHA standard that is substantially similar to the 1st offense, the supervisor will formally write up the employee using the disciplinary action form. The employee will then be sent home, without pay for the remainder of the day. Upon return to the site the next day, the supervisor will re-train employee and document this training on the disciplinary action form. Future discipline will be discussed with employee.
3. **3rd Offense:** Employee will be removed from hazardous situation immediately. If an employee is found in violation of the same or substantially similar rule, the supervisor will formally write up the employee using the disciplinary action form. The employee will be suspended without pay for at least 3 days. The employee will not be allowed to return to work until cleared by upper management. Upper management reserves the right to terminate employment at this time.

Willfully Violating Safety Rules—any employee who refuses to work safely, or to observe company safety and health guidelines, who refuses to use proper protective equipment, or who fails to obtain proper permits, where required, or fails to observe required procedures, will be subject to verbal and written warnings resulting in disciplinary action, which may lead to termination of his or her employment with the company. The severity of disciplinary action will be determined by the frequency and severity of infractions, and may include reprimand, time off without pay, or termination. Willfully endangering one's life or the life of another person is gross misconduct, and may be cause for immediate dismissal.

SAFETY & HEALTH PROGRAM LOCATION

This SAFETY & HEALTH PROGRAM, with its file of Safety Data Sheets (SDS), is to be kept in the jobsite construction office for immediate availability to employees, emergency personnel and regulatory agencies.

GENERAL RESPONSIBILITIES

EMPLOYEES—safety is a management responsibility; however, management cannot be solely responsible for the acts of employees. Therefore, each employee shall, as a condition of employment for which he or she is paid, be responsible to work safely, including but not limited to the following specific responsibilities and duties:

General Safety and Health:

- a. Study, understand and comply with the requirements of the SAFETY & HEALTH PROGRAM and comply with any other laws or regulations which may apply to his or her work.
- b. Work in a manner which will avoid self-injury and prevent injury to fellow workers.
- c. Attend any required employee safety and health orientation, and any regular or special employee safety training.
- d. Acknowledge, by personal signature, any training received.
- e. Refuse to perform any potentially hazardous or non-routine task, or to use any hazardous material, until properly trained about the hazards involved, and about the proper safety and health procedures to follow.
- f. Properly use and care for personal protective equipment required for the task at hand.
- g. Report any hazardous condition to the employee's supervisor, including any negligent act, a physical or health hazard, any unsafe use of hazardous materials by Company employees or by an employee of some other employer in the jobsite.
- h. Report any job-related injury or illness to the employee's supervisor and seek treatment immediately. Reporting of any injury or illness shall be made as soon as practical and should take place within 24 hours except under unusual circumstances.
- i. Know what emergency telephone numbers to call in the event of a fire, accident or personal injury.
- j. Help to maintain a safe and clean work area.

Hazard Communication:

- a. Know the location of the written Hazard Communication Plan, the Chemical Inventory List and the SDS files with emergency contact numbers.
- b. Refuse to use any hazardous material if not trained in its use. Request a refresher training if unsure about the use, storage, handling or personal protective equipment requirements.
- c. Know how to read a SDS, the Chemical Inventory List and any chemical warnings and labels.
- d. Never remove nor deface hazardous chemical labels.
- e. Know how to detect the presence of a hazardous chemical in the jobsite by odor, appearance.
- f. Never waste hazardous chemicals on site. (i.e. do not dump hazardous materials on the earth)

- g. Become trained in the proper use of required protective equipment, and wear or use such equipment properly while working with hazardous chemicals.
- h. Be properly trained about the hazards of any assigned work tasks, about which the employee has not been previously trained, before attempting to perform such "non-routine" tasks.

SUPERVISORS—unless notified otherwise, the supervisor of each jobsite (may be the Owner, Project Manager, Project Supervisor, Superintendent, Foreman or other supervisory position) is responsible for the implementation of the Company SAFETY & HEALTH PROGRAM at each jobsite he or she supervises. Add the following supervisory duties to those he or she has as an employee:

General Safety and Health:

- a. Set the example for good safety and health practices.
- b. Provide a bulletin board in each job trailer and display all required postings.
- c. Establish and implement procedures for jobsite safety, health, first aid, fire prevention, site security, environmental pollution control, and others that comply with Company SAFETY AND HEALTH GUIDELINES, contract documents and specifications, and with local, state and federal laws and regulations.
- d. Conduct an employee Safety Orientation whenever a new employee comes into the jobsite.
- e. Prepare for and provide jobsite Tool Box safety meetings, with rules and regulations for each site. These Tool Box safety meetings shall occur
- f. Train employees under his or her supervision about the provisions of these SAFETY AND HEALTH GUIDELINES, about jobsite hazards, safe working procedures and policies, how working safely can prevent accidents, and how one can avoid injury and prevent property damage.
- g. Monitor the safety and health performance of employees and subcontractors. Prepare written warnings and reprimands for violations of this SAFETY & HEALTH PROGRAM.
- h. Monitor the status of jobsite safety and health, by personally conducting jobsite safety inspections and by directing corrective action. These jobsite safety inspections need to be formally documented on a basis.
- i. Assure the availability of required safety equipment and personal protective equipment needed for the work being done, giving special attention to non-routine tasks.
- j. Cooperate with other employers and subcontractors to improve overall safety and health conditions in the jobsite.
- k. Investigate and document accidents and losses immediately, analyze the causes, and prepare recommendations to prevent similar accidents in the future. Prepare reports for worker's compensation, employee reprimands or disciplinary action immediately following an incident. This should be completed within 24 hours of the accident or incident.
- l. In the event of a serious accident or a government safety or environmental inspection, notify upper management ASAP.

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- m. Be familiar with the OSHA Standards for the Construction Industry and be able to find information in OSHA Standards when necessary. These are available at www.osha.gov. If you work in a state with their own state OSHA plan and regulations, be familiar with those as well.

Hazard Communication:

- a. Maintain the Hazard Communication Plan found in this program for each jobsite supervised.
- b. Conduct Hazardous Chemical Inventories. Maintain and preserve the Chemical Inventory List found after the Hazard Communication Plan in this program.
- c. Supervise the proper procurement of all hazardous chemicals to be present in the jobsite supervised. Receive and check all shipments of hazardous chemicals for SDS and labels.
- d. Verify that labeling is properly done. Maintain a supply of labels and other hazard warnings.
- e. During the employee Safety Orientation, make sure employees know where to find the Hazard Communication Plan, explain labels and other hazard warnings and the Chemical Inventory List and teach him or her how to read a SDS.
- f. Train all employees under his or her supervision as required by this Hazard Communication Plan. Prepare a Training Report for each hazardous chemicals training done, which certifies by each employee's signature, the training received. Keep the training record on file in this SAFETY & HEALTH PROGRAM.
- g. Provide special training and equipment needed to safely perform non-routine tasks.
- h. Coordinate hazard communication with other employers, such as subcontractors, in a company jobsite as needed to protect company employees.
- i. Direct the proper cleanup of any hazardous chemical spill, prepare required reports and notify upper management. Check your Storm Water Pollution Prevention Plan for local jurisdictions that may require notification of spills or unintentional releases.

UPPER MANAGEMENT—the company's upper management is responsible to provide direction, motivation and accountability to ensure a dynamic safety and health program for all company jobsites. Specific responsibilities include:

- a. Set the example for good safety and health practices.
- b. Establish annual Company safety goals and objectives.
- c. Establish an adequate budget to fund the safety and health program. Subcontractors, trade partners, suppliers and vendors are also responsible to develop, implement and follow their own safety and health program, including providing the proper funding of to successfully achieve the goals of the safety program.
- d. Ensure competent persons are assigned to tasks required for such activities such as Fall Protection, Scaffolding, Excavation, Confined Space, Cranes, etc.
- e. Ensure qualified persons are assigned to review and update this safety and health program as necessary.
- f. As part of performance evaluations, hold supervisors accountable for the success or failure of achieving specific safety and health performance and insurance cost control goals.
- g. Periodically take part in employee safety training.
- h. Review all injury and accident reports and OSHA 300 Logs.
- i. Report any reportable event that occurs to an employee of the company to OSHA:

- a. Fatality: within 8 hours
 - b. Hospitalization: within 24 hours
 - c. Amputation: within 24 hours
 - d. Loss of Eye: within 24 hours
- j. Require any subcontractors, trade partners, suppliers and vendors who have a reportable event on a company jobsite to report the issue to OSHA.

DEFINITIONS

Competent Person means 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.

Qualified Person means one who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience, has successfully demonstrated his ability to solve or resolve problems relating to the subject matter, the work, or the project.

RELATED STANDARDS

The following Standards are incorporated herein by reference:

- OSHA Standard 29 CFR Part 1926 "SAFETY AND HEALTH REGULATIONS FOR CONSTRUCTION", latest edition

The requirements of the above standards are general. They contain far more detailed information than the SAFETY & HEALTH PROGRAM. Where information is lacking, or in the event of any conflict between the information in this program and the requirements of the OSHA standards, the OSHA Standards shall govern. Jobsites located within states with a State run OSHA program shall follow the state specific standards.

MODIFICATIONS, UPDATES AND EXPANSION

Local, State and Federal regulations can change, and new and better safety and health procedures are often discovered. Such changes create, from time to time, a need to modify or update this Safety Program.

Because working conditions vary from site to site, some procedures may need to be changed to meet the site-specific safety needs for a particular project. The Project Supervisor, therefore, may modify or expand the procedures for his jobsite, as needed, with prior, written approval from upper management.