
CALIFORNIA HIGH SPEED RAIL



Injury Illness Prevention Plan



A Joint Venture

Management Commitment to Safety – IIPP

The Dragados USA, Inc. and Flatiron West, Inc. Joint Venture (“DFJV”) is committed to protecting the safety, health of our employees and the general public, working with our construction management and subcontractor partners for the protection of their respective workforces, and protecting the environment. It is therefore expected and requested that each person, of every tier and position, involved in the DFJV project commit to maintaining the values, goals, and objectives outlined within the body of this plan.

The Mission of the DFJV Management Team, with respect to Health, Safety and the Environment, is the prevention of injury, illness, environmental impact, and property damage during all construction activities that are conducted at DFJV jobsites. This Mission will be accomplished through a multi-dimensional approach to the management of safety, including the following:

- Development of strong partnerships between DFJV, California High Speed Rail Authority (CHSRA) and subcontractors.
- Implementation of a comprehensive Environmental, Safety and Health Plan for construction activities.
- A defined accountability and responsibility program that fosters safety ownership during construction.
- A structured self-evaluation program for the purpose of monitoring and continuous improvement.
- Development and maintenance of a training and education program specific to construction activities.
- A defined set of company-wide goals and objectives related to the safety and health of the workforce.
- Injury prevention through a focus on activity pre-planning at every level of construction.
- A subcontractor assessment process intended to increase the value of safety management systems.
- Maintenance of strong, open communication lines, where all interested parties add value to safety.

This approach, in conjunction with a strong management commitment and maintenance of positive relationships will prove to be an invaluable asset to DFJV, its partners and its neighbors. Meeting this goal will require steadfast dedication at every level of the construction project and begins with this commitment by the management team at the DFJV. The implementation of this IIPP is the responsibility of the DFJV Project Director and the DFJV Management Team.

Sean Lind – Project Director

Heather Simmons– Safety & Security Mgr.

Safety Communications and Responsibilities

Communications and Meeting Requirements

Managers and supervisors are responsible for communicating with all workers about occupational safety and health, and the policies and procedures outlined in the DFJV Safety – Injury and Illness Prevention Program (IIPP) documents. Information can be conveyed through videos, PowerPoint presentations, written communications, posted notices (bulletin boards, tailgates, etc.), and through various Safety meetings. All managers and supervisors shall ensure that meeting requirements are met.

Job Hazard Analysis (JHA)

JHAs are developed using the task related SOP as a reference and must be completed prior to beginning the operation. The JHA takes the general information from the SOP and incorporates the safety and occupational health hazards specific to the job site, where the work will be performed.

Superintendents will work with engineers and safety representatives to review the SOP and incorporate site-specific activities, additional tasks, hazards, and corrective measures. Completed JHAs shall be reviewed to ensure compliance with all applicable regulations and DFJV policies. Any needed revisions shall be made to the JHA before work starts on the specific operation. The superintendent will discuss the JHA with the crew before an operation begins and will ask for additional comments for the JHA and make revisions if needed. Following the initial operation, and as often as needed, JHAs shall be reviewed by the Superintendent, engineer and safety representative to verify that all vital steps are included, all hazards are identified, and that all corrective measures are implemented.

Daily Risk Assessments (DRA)

These meetings will be held daily and recorded. The DRA will be turned in at the end of the shift. This meeting is held to communicate hazards associated with operations the crew are scheduled to perform that day and/or at that specific time. The foreman is responsible for conducting these meetings and facilitating participation from his or her crew.

More than one DRA may be required if the crew is performing multiple operations. If an operation changes during the shift, the crew should stop the operation and notify their foreman. The foreman should revise the DRA to reflect the new operation and the DRA will be reviewed with the crew upon completion. The operation may proceed after this point.

Stretch and Flex

Employees shall warm up prior to starting work. Many injuries occur because muscles are tight from previous exertion or from lack of exercise. This is especially common when returning to work following a weekend or day off.

Simple stretch exercises shall be performed prior to starting work each day in order to loosen muscles and improve flexibility. Stretching exercises shall be light in intensity and employees will be instructed to stretch only as far as they feel comfortable. To prevent muscle pulls, stretching should be done in a smooth manner without “jerking” motions.

Exercises to be Performed

Deep knee bends (Squats) - Perform these to stretch leg muscles.

Back Stretch - Reach with arms stretched toward the ceiling and stand on tip toes to stretch back muscles.

Hip Stretch - Stretch from side to side to increase hip flexibility.

Shoulder stretch - cross left arm across chest and apply pressure to the arm with right hand. Gently pull toward chest. Repeat for right arm.

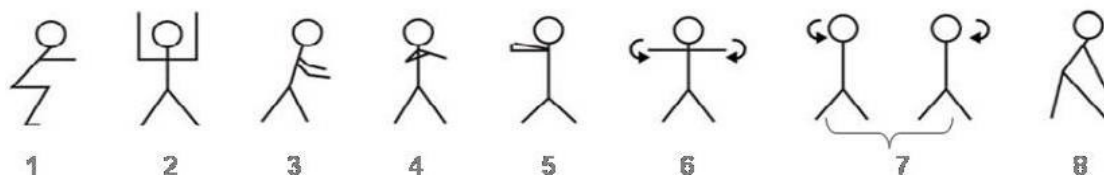
Finger Stretch - Stretch one arm out straight and pull fingers back with the other hand and arm. This is a carpal tunnel exercise.

Airplane (Windmill) Exercise - Roll fully out-stretched arms in forward circles, then roll in backward circles.

Neck Roll - Turn head gently to the left as far as is comfortable, then to the right, then back to center and lean head forward to chest as far as is comfortable. Gently roll neck in circular motion in one direction, then reverse. This loosens neck muscles.

Hamstring Stretch - Stretch right leg forward and try to touch the toe of boot to stretch ham strings. Switch legs to stretch left hamstring.

Shake Out Muscles - Let arms dangle and “shake out” your hands to loosen muscles.



Employees are not required to do any exercise that causes discomfort. Any discomfort experienced during exercise should be reported to the appropriate supervisor or foreman.

Toolbox Safety Meetings

All employees shall attend weekly toolbox meetings. These meetings focus on designated safety related topics. Employees in attendance shall sign the Weekly Safety Meeting form to acknowledge their understanding of the safety material that was presented and the sign in sheets shall be retained and copies sent to a safety representative.

Monthly Mass Safety/Training Meetings

A designated training topic will be delivered to all field employees once each month to ensure all workers are receiving standardized training on a wide range of safety topics. Topics include but are not limited to: ladder safety and access to working surfaces; hazardous communication; PPE; heat stress; fall protection; trenching and excavations; crane safety; moving equipment; rigging; material handling and safe lifting techniques; small tool safety and electrical safety.

Safety Meeting Reports must be documented.

Safety Committee Meetings

The main purpose of the site safety committee is to improve safety culture. Committee meetings will encourage all employees to participate in the safety process and give them an opportunity to provide feedback. The committee should promote synergy between crafts and create effective strategies for improving the safety culture of the project.

- The committee should include the project or segment manager, safety manager, 2-10 craft employees (different crafts) and an engineer or other management position.
- Rotation of the craft employees every 3 months shall be accomplished to improve the effectiveness of the committee.
- Minutes of safety committee meetings shall be discussed and distributed to all project employees at the monthly “mass” meetings.
- The meeting should be held at least once a month.
- The meeting should last no more than 1 hour.
- Conduct a safety walk throughout the project looking for suggestions and/or areas that need improvement.
- Discuss any problem area regarding safety hazards of exposures.
- Everyone on the committee should be expected to participate and give suggestions for improvements.
- Discuss a different safety policy at each meeting for education and discussion.
- Discuss equipment safety if needed.
- Assign action items to the committee members one or two weeks in advance of the meeting. (Examples: audits of work area, ask other crew members for improvement suggestions to discuss with the committee)

Responsibility, Assignments and Compliance Expectations

Procedures outlined in this document pertain to employee, administrative, supervisory, and managerial obligations related to the following areas of DFJV’s Safety - Injury Illness Prevention Program (IIPP): Responsibility, Compliance, and Communication

Project Director

The Project Director shall:

- Begin all meetings with a safety review or safety moment discussion.
- Be engaged in, abide by, and actively support all Safety-IIPP initiatives and policies and comply with all local, state or federal regulations.
- Actively participate in other area or project safety meetings and safety training endeavors.
- Ensure the project under his/her control plans for safety in accordance with all policies and procedures.
- Complete SSI’s in accordance with DFJV policy.
- Ensure implementation and execution of all injury and illness prevention policies within this project.

- Actively participate in lost-time, recordable, and serious incident investigations, completing initial notifications within 48 hours.
- Take active role in all positive safety recognition and disciplinary safety actions.
- Be STS certified or working towards certification.

Deputy Project Manager

The Deputy Project Manager shall:

- Begin all meetings with a safety review or safety moment discussion.
- Be engaged in, abide by, and actively support all Safety-IIPP initiatives and policies and comply with all local, state or federal regulations.
- Actively participate in project safety meetings.
- Ensure the project under his/her control plans for safety in accordance with all policies and procedures.
- Complete SSI's in accordance with DFJV policy.
- Ensure implementation and execution of all injury and illness prevention policies within this project.
- Actively participate in lost-time, recordable, and serious incident investigations, completing initial notifications within 48 hours.
- Take active role in all positive safety recognition and disciplinary safety actions.
- Be STS certified or working towards certification.

Segment Manager

The Segment Manager shall:

- Begin all meetings with a safety review or safety moment discussion.
- Be engaged in, abide by, and actively support all Safety-IIPP initiatives and policies and comply with all local, state, or federal regulations.
- Actively participate in other area or project safety meetings and safety training endeavors.
- Ensure the project under his/her control plans for safety in accordance with all policies and procedures.
- Complete SSI's in accordance with DFJV policy.
- Ensure implementation and execution of all injury and illness prevention policies within this project.
- Review safety training/certification matrix quarterly with construction manager to identify new training requirements or areas where more detailed or advanced training is needed.
- Actively participate in lost-time, recordable, and serious incident investigations, completing initial notifications within 48 hours.
- Take active role in all positive safety recognition and disciplinary safety actions.
- Be STS certified or working towards certification.

Construction Manager

The Construction Manager shall:

- Begin all meetings with a safety review or safety moment discussion.
- Be engaged in, abide by, and actively support all Safety-IIPP initiatives and policies and comply with all local, state, or federal regulations.
- Attend toolbox safety meetings and actively participate in subcontractor and project safety meetings and safety training endeavors.
- Ensure the project under his/her control plans for safety in accordance with all policies and procedures.
- Complete SSI's in accordance with DFJV policy.
- Review safety training/certification matrix quarterly with the segment manager to identify new training requirements or areas where more detailed or advanced training is needed.
- Ensure implementation and execution of all safety policies and procedures.
- Investigate lost-time, recordable, and serious incident investigations, completing initial notifications immediately and completing root cause analysis report within 48 hours of incident.
- Prepare quarterly review and analysis of all recordable incidents and near misses and submit to project executive committee.
- Take active role in all positive safety recognition and disciplinary safety actions.
- Be STS certified or working towards certification.
- Participate in Level 3 orientation.

Safety Manager

The Safety Manager shall:

- Begin all meetings with a safety review or safety moment discussion.
- Be engaged in, abide by, and actively support all Safety-IIPP initiatives and policies and comply with all local, state, or federal regulations.
- Be an active participant of the Safety Committee upon request and support and contribute to all other safety committee efforts and weekly toolbox meetings within his/her area of authority.
- Ensure the project plans for safety in accordance with all policies and procedures and shall be specifically involved in development of site-specific Job Hazard Analysis (JHAs) plans.
- Schedule, assign and assist with monthly documented site safety self-assessment audits for each project.
- Participate in new hire orientation, ensure new safety supervisors receive DFJV policy and procedure instruction, and verify that on-going employee safety training satisfies safety training matrix and applicable certification requirements.

- Be a valuable resource able to monitor DFJV compliance with all regulatory and governmental safety standards, policies and procedures.
- Assist with investigation of any lost-time and serious incident investigations, completing initial notifications immediately; and completing reports within 48 hours of incident.
- Ensure all safety communications are adequately distributed to all appropriate persons. Communications may include but are not limited to, changes in regulations, policies or procedures, incident alerts, near miss information and statistical safety data.
- Collect and track pertinent safety data as required by DFJV or Owner.
- Take active role in all positive safety recognition and advise operations in disciplinary safety actions.

Superintendent(s)

The Superintendent shall:

- Begin all meetings with a safety review or safety moment discussion.
- Be engaged in, abide by, and actively support all Safety-IIPP initiatives and policies and comply with all local, state, or federal regulations.
- Attend weekly toolbox meetings, and actively participate in subcontractor and project safety meetings and safety training endeavors.
- Ensure each operation he/she works with plans for safety in accordance with all policies and procedures and shall be specifically involved in development of site-specific Job Hazard Analysis (JHAs) plans.
- Accurately document safe/unsafe performance history of workers which shall be reviewed prior to consideration of promotions, raises or bonuses.
- Be engaged in and schedule 90-day orientation for new hire review and the assignment of a white hardhat.
- Inspect jobsites daily to correct deficiencies, and complete at least one documented site safety inspection per month.
- Be familiar with and ensure compliance with all regulatory and governmental safety standards, policies and procedures applicable to each operation under his/her authority.
- Actively participate or assist with any lost-time, recordable or serious incident investigations.
- Review all recordable incidents and near miss reports/alerts upon receipt to ensure preventative/corrective measures are in place on this project.
- Take active role in all positive safety recognition and disciplinary safety actions.
- Possess a thorough understanding of training content and actively participate in new hire orientations. The superintendent shall ensure all new employees receive orientation training and he/she also has primary responsibility for reinforcing safety practices and procedures for all employees on the jobsite.

Foremen

The Foreman shall:

- Lead each work shift in Stretch and Flex exercises.
- Conduct Monday morning toolbox meetings and begin all other meetings with a focus on safety.
- Be engaged in, abide by, and actively support all Safety-IIPP initiatives and policies and comply with all local, state or federal regulations.
- Actively participate in subcontractor and project safety meetings and safety training endeavors.
- Ensure each operation he/she works with plans for safety in accordance with all policies and procedures and shall be specifically involved in development of Daily Risk Assessments (DRAs) and JHA's for all assigned tasks.
- Monitor work conditions and practices by performing daily jobsite inspections to identify deficiencies so that corrective measures can be implemented.
- Be familiar with and ensure compliance with all regulatory and governmental safety standards, policies and procedures applicable to each operation under his/her authority.
- Have primary responsibility for ensuring all types of incidents (injury, near miss, vehicle, property, etc.) are reported regardless of seriousness, and are documented in writing using the correct form within the proper time frame and through appropriate channels.
- Actively participate in any lost-time, recordable, or serious incident investigations, completing initial notifications immediately; and completing reports within 48 hours of an incident.
- Review all recordable incidents and near miss reports/alerts upon receipt to ensure preventative/corrective measures are in place on operations under his/her authority.
- Take active role in all positive safety recognition and disciplinary safety actions.
- Provide continuous reinforcement of safety practices and procedures for all employees on the jobsite and ensure that additional hands-on training and education are provided to workers as needed.

Engineer(s)

The Engineer shall:

- Begin all meetings with a safety review or safety moment discussion.
- Be engaged in, abide by, and actively support all Safety-IIPP initiatives and policies and comply with all local, state or federal regulations.
- Attend and participate in toolbox safety meetings.
- Design and assist with the safety planning on project in accordance with all policies, procedures and engineering requirements, and shall be specifically involved in development of site-specific Job Hazard Analysis (JHAs) plans.
- Ensure safety measures are incorporated into all engineering designs and ensure that all applicable regulatory, governmental or DFJV standards are met.
- Monitor work conditions and practices while on jobsite to identify deficiencies so that corrective measures can be implemented.

- Have primary responsibility, when assigned, for critical crane lift calculations, power line clearance distances and designing rigging devices for lifting materials.

All Employees

Failure to comply with safe practices shall result in disciplinary action up to and including termination of employment.

The employee shall:

- Be engaged in, abide by, and actively support all Safety-IIPP initiatives and policies and comply with all local, state or federal regulations.
- Attend and participate in toolbox and safety meetings as required.
- Protect themselves and co-workers from hazards by being familiar with and understanding the operation JHAs and Daily Risk Assessments.
- Immediately report to his/her supervisor any near miss/near hit incident, any unsafe act or condition, or any other workplace incident without fear of reprisal.
- Seek assistance or training in unfamiliar situations.
- Have the right to refuse work if conditions are deemed to be unsafe or hazardous.
- Be an active participant of any safety committee upon request.

Employees are only permitted to use personal cell phones while on break and lunch unless in the event there is an emergency

Progressive Discipline Policy

This policy outlines the Progressive Discipline Policy for all DFJV Employees.

Violation of DFJV rules or unsatisfactory performance calls for disciplinary measures to minimize future occurrences. This may involve one or more of the following: verbal warning, written warning, suspension (with or without pay), or discharge. IF IN THE OPINION OF DFJV MANAGEMENT, THE VIOLATION IS SERIOUS ENOUGH, ANY OR ALL OF THE STEPS MAY BE REPEATED OR BYPASSED, AND TERMINATION MAY OCCUR.

Purpose

The Progressive Discipline Policy will be used to properly document performance or behavior problems, provide the employee the opportunity to correct such problems, and assure that the employee understands the consequences of failing to correct the stated issue.

Employee Responsibility

It is the responsibility of the employee to know, understand and abide by the policy. The employee should ask questions if they are unclear about the intent or application of the policy and be an active partner in sustaining a healthy culture.

Supervisor Responsibility

It is the responsibility of the supervisor to lead by example; they must know, understand and personally abide by the policy. The Supervisor is responsible for creating an environment that is compliant with the policies and hold employees accountable for violation of policies.

Disciplinary action should:

- Be performed as soon as possible after the infraction occurs.
- Be consistent with past practices whenever possible.
- Give the employee an opportunity to tell their side of the story and notes taken. Do not "rush to judgement" but take the time necessary to investigate.

Major DFJV Violation Areas

Violations of DFJV rules require some form of discipline. However, violations may occur in many areas. THESE ARE SHOWN AS EXAMPLES ONLY AND SHOULD NOT BE CONSIDERED ALL INCLUSIVE:

- **Absenteeism** - Absent from work without pre-arranged permission from the employee's direct supervisor.
- **Substance Abuse** - The DFJV will require a test if it believes the employee is under the influence of drugs or alcohol. A positive test will be grounds for termination. (See substance-abuse policy.)
- **Theft** - Theft of property from the DFJV, co-worker or others.
- **Safety** - Unsafe practices including, but not limited to, violations of safety guidelines established by the DFJV for a particular jobsite, or federal, state, or local regulations.
- **Destruction of Property** - Destruction of DFJV, employee, owner or subcontractor property.
- **Job Performance** - Inadequate performance of job duties.

Types of Disciplinary Actions

The following disciplinary action will be applied:

Verbal Warning

A supervisor shall document a verbal warning and include the date, content, reasons, and the employee's reply. This is the first written notice to the employee's file and will be completed on a Performance Counseling Record (PCR) signed by the employee and the employee's manager. A remedial action plan to correct the problem-including training or retraining steps-may be offered at this time and noted on the PCR. The issue may progress to a written warning if not resolved in the timeframe established by the employee's manager. A copy of the verbal warning documentation is to be forwarded to the HR department for inclusion in the employee's personnel file.

When issuing a verbal warning, certain specific points should be covered. These include:

- Talk to the employee away from the immediate working area and review past events.
- Make sure the employee knows he/she is being counseled.
- Document the facts of the reprimand using the Performance Counseling Record (PCR).

- Require immediate and sustained improvement.
- Provide specific examples of help for the employee so the problem can be resolved.

Written Warning

This is the second written performance notification to the employee's file. If the employee demonstrates further behavior and or performance issues not resolved in Verbal Warning, the Written Warning will involve further documentation of the behavior and or performance issue on a Performance Counseling Record form, any changes noted (positive or negative) since the verbal warning and additional clarification of the action plan to correct the problem. The resolution of the employee's issue will be determined by the employee's manager and HR manager. This issue may progress to a final written warning, including possible termination of employment, if it is not resolved in the timeframe established by the employee's manager.

In a written warning, the supervisor will:

- Note the infraction involved. Be specific, focus on what was observed and heard, not what was rumored.
- Note the DFJV policy and/or rule, which was violated, along with the date of the infraction.
- List all prior disciplinary actions and/or counseling for the same or similar offenses, which have taken place in the past.
- State that the notice constitutes a written warning and will become a part of the employee's record and that failure to improve performance or meet expectations as described may result in further counseling action, up to and including termination.
- Indicate that the written warning is to assist the employee with an opportunity to correct their actions.
- Note to the employee that failure to correct the given situation will result in further disciplinary action up to and including termination.
- Obtain the employee's signature acknowledging receipt of the warning. If the employee refuses to sign, note that on the form. A witness should then sign the form.
- Forward copies of the warning to the HR department to be placed in the employee's personnel file. The employee is also entitled to a copy of the warning.

Final Written Warning

This is the third and usually the last written performance notification prior to termination. If the behavior and/or performance issue is not resolved in a written warning, a final written warning may involve the completion of a Performance Counseling Record stating that any further recurrence of the issue may result in termination of employment. Resolution of the issue will be determined by the employee's manager.

Accelerated Discipline

Some violations of DFJV policies or work rules may be serious and warrant immediate termination. Other violations may not be serious enough for immediate termination but may warrant "accelerated" disciplinary action (i.e., give a Final Written Warning without first giving a Written Warning). Any decision to accelerate disciplinary action will be determined by management on a case-by-case basis.

Disciplinary Suspension

A disciplinary suspension, as all other disciplinary actions, will be used at any time at the option of the supervisor depending upon the facts and circumstances of the incident. Employees may be suspended with or without pay, depending on the violation.

An employee may be suspended, while an investigation is conducted or while a determination is made by Management. In these circumstances, the following will apply:

- An employee terminated at the end of an investigatory suspension period may not be paid for any of the suspension period.
- An employee returning at the end of an investigatory suspension period and receiving any level of written discipline may not be paid for the suspension period.
- An employee returning to work at the end of an investigatory suspension period and not receiving discipline will generally be paid for the time missed due to the suspension.

The same basic format for all other suspensions and the same rules of documentation apply as listed above.

Termination

Termination is always an option, but is typically, but not always, reserved for more serious infractions or after lesser disciplinary action has failed to correct the problem.

Administration of Disciplinary Action

An employee who has concern with a disciplinary action taken may always confer with the HR department.

Code of Safe Practices

DFJV requires all employees to follow all safety rules and regulations. Our standards will help ensure the safety of all employees and will help maintain a high quality of life. Please read the following Code of Safe Practices:

- Report all unsafe conditions and work practices immediately to your supervisor so that corrective actions can be implemented.
- Always follow safe work practices and the safety program. Failure to follow safe work practices may lead to discipline and termination. Any employee can refuse to perform work he feels is unsafe.
- Employees are expected to attend and participate in mandatory weekly safety meetings.
- Alcohol and drug use are prohibited during working hours and anyone thought to be under the influence will not be permitted to work.
- Horseplay and fighting are prohibited!!
- No one shall be permitted to enter a confined space unless proper procedures have been followed, atmosphere has been tested, and the necessary precautions have been taken as indicated by the test results.
- All guards and other protective devices shall be left in place unless removed by authorized personnel for the sake of equipment and/or tool repair or maintenance after operation has been ceased. Safety devices must be replaced **BEFORE** turning the equipment or tool back on.
- Deficiencies shall be corrected or reported immediately.

- Only authorized personnel shall work with, on, or handle any electrical equipment, machinery, air or water lines.
- All injuries shall be reported to your supervisor immediately, no matter how minor. Failure to do so may jeopardize your benefit eligibility.
- Plan your lift and always use your legs while lifting. Avoid twisting actions and remember to get help with heavy or awkward loads. **DO NOT LIFT WITH YOUR BACK!!**
- Only work boots in good repair shall be permitted. Sneakers and other soft-sided shoes are prohibited.
- Never throw materials, tools or other objects from heights unless the area below has been barricaded and all jobsite personnel have been instructed to stay out.
- Crew supervisors are responsible for seeing that all personnel in their crew are properly trained on all substances with an SDS. Each employee shall work in accordance with those instructions.
- When using a ladder, always face the ladder. Use both hands to ascend and descend the ladder.
- Gasoline shall not be used for cleaning.
- Welding or burning shall not be performed in any enclosed vessel, or other confined space, unless all necessary precautions have been taken and the superintendent authorizes the work.
- Hard hats and safety glasses shall be worn at all times with the possible exception of the parking and office areas, and while operating identified equipment.
- Personal protective equipment shall be issued as necessary and its use shall be mandatory. Replacements are available and can be obtained by turning in your old or damaged gear.
- Only **assigned and qualified** personnel shall be allowed to operate equipment. **NO EXCEPTIONS** to this policy will be tolerated.
- Firearms are prohibited on the jobsite and parking areas.
- Warning signs are posted for your protection. You are expected to comply with them.
- Emergency and fire equipment must be kept free of obstructions and must be accessible.
- The use and type of scaffolding or false work required to perform the work safely shall be determined by supervisors and other qualified personnel.
- Scaffolding and false work installation, dismantling, and inspection shall be supervised by a competent person and shall be constructed in accordance with OSHA and manufacturer's standards.
- Protruding reinforced steel shall be protected by the use of approved covers or troughs, where employees are exposed to an impalement hazard.

Training, Orientation, and Instruction

Orientation/Training/Employee Education

DFJV's goal is to perform work in the safest manner possible consistent with good, economically sound construction practices. Various levels of employee orientation, training and on-going education have been developed to enable employees to work safely. Effective employee training helps prevent damage to tools, equipment and materials while helping prevent or reduce hazardous exposures to employees, subcontractors, and the public that could result in personal or occupational injury.

New Hire Orientation

All employees shall attend pre-job training/orientation regarding the content of the DFJV's safety program. In addition, a site-specific discussion by DFJV of potential site hazards, the safety goals of DFJV and a brief test to gauge retention of the information is provided. An employee performing work for which OSHA requires a competent person shall identify that person for each area of work in writing, prior to work commencing, using the JHA process.

Orientation Checklists

New hire checklist shall be provided to each employee prior to orientation training. Only applicable sections shall be checked off during each orientation. The employee shall complete personal emergency contact information each time he/she receives a checklist so that current contact information can be attached to the employee's electronic personnel record.

Conducting Orientation

All craft employees, management, visitors, and vendors must attend a safety orientation before entering the DFJV project.

The following outlines the topics covered:

- Coronavirus (COVID-19) Prevention & Mitigation Policy
- Substance Abuse Policy
- Emergency Action Plan
- Parking
- Access and Security Requirements
- Lunch Areas
- Designated Smoking Areas
- Incident/Accident Reporting
- Safety Responsibilities
- Personal Protective Equipment
- Housekeeping
- Hazard Communication / GHS
- Fire Prevention/Protection
- Personal Tools
- Hand/Power Tools
- Electrical Safety
- Lock Out/Tag Out
- Ladders/Scaffolds
- Fall Protection
- Walking/Working Surfaces
- Hoisting and Lifting Operations

- Excavations
- Confined Space Operations
- Equipment and Vehicle Safety
- Job Site Meetings
- JHA/DRA Process
- Disciplinary Procedures

Each DFJV employee attending the orientation will complete an orientation comprehension quiz.

Revisions to the orientation information will be communicated to employees utilizing project bulletin boards, safety committee, and handouts to be included in toolbox meetings.

Contractor/Sub-Contractor Orientation

Each Contractor and/or Sub-contractor is responsible to conduct additional orientation sessions as necessary to communicate unique information pertaining to their specific scope of work and location of work. Contractors must have authorization through the Project Manager prior to initiating any work within the project work area. A training program may be required for crafts persons working on DFJV's project.

Contractors not attending the conceptual pre-job meeting (kick-off) will not be permitted to conduct any type of work activity on the site unless approved by project management.

Subcontractors:

Subcontractors are required to provide the DFJV with a copy of a written Project Specific Safety Plan or commit to following the DFJV IIPP. This plan must contain, at a minimum, the following requirements:

- The name of the management person who is responsible for the implementation of the plan and field representative who will monitor the efforts during the project.
- How each will conduct their weekly toolbox talks.
- Provisions for safety inspections of the job site by supervision.
- Process for completing hazard assessment and correction.
- A process that will be used to ensure that all required training has been communicated to employees.
- Incident reporting, first aid, and emergency procedures. Details for the management of work-related injuries.
- A list of all competent person(s) overseeing those tasks for which OSHA requires such person(s) or that have been requested by DFJV including certification.
- After each accident, where equipment or property damage occurs, injury to an employee or subcontractor employee an incident report must be provided.

Cranes and Rigging (Crane I, Crane II, Crane III)

Crane I training is MANDATORY for all employees on projects, who will be working on or near cranes (Crane operators, riggers, foremen, engineers and superintendents). The training may be provided in-house or by a vendor.

Confined Spaces

This is a MANDATORY class for employees on any project involved with or working in confined spaces. This class outlines DFJV policy, explains what qualifies as a confined space, explains emergency rescue procedures, and covers monitoring devices.

Lock-Out/Tag-Out

This training is MANDATORY for personnel working near energy sources or utilizing energy sources. Training shall include an overview of required policies and protection lockouts to ensure machinery or energy is de-energized. Training may be performed in-house or by a vendor.

Trenching and Excavations

A competent person is required to be present on the site any time an employee is exposed to trenches or excavations. Projects that have excavations need to have a designated individual trained in the knowledge of soils, methods of protection, and government regulations. Training occurs on site as needed.

Recordkeeping

Policy

Recordkeeping protocols are required in order to facilitate training, provide discipline, and to initiate preventative/corrective measures for behaviors, site conditions and operational practices. All such documentation shall adhere to DFJV's guidelines as well as local, state or federal regulations regarding reporting, distribution and retention.

Records to Retain

Records that shall be maintained include but are not be limited to the following activities:

- Hazard assessment planning
- Workplace/Hazard assessment inspections
- Equipment Inspections
- Orientation/Training
- Incident, injury and illness reporting
- Applicable local, state or federal forms or reports as required

Documentation

All records shall be documented in writing and must clearly identify subject matter or description of incidents; employee or claimant names; time and date of the training or activity; location of occurrence; the name and signature of the inspector, instructor or training provider.

DFJV shall maintain master files in hard copy and or electronic format for data analysis and to generate monthly, quarterly, or annual reports as requested by regulatory agencies or executive management.

Distribution and Review

DFJV employees have the right to examine and receive a copy of our IIPP. This will be accomplished by the following methods:

1. Provide access to the employee with a written copy of the DFJV IIPP within 5 business days, in a reasonable time, place, and manner, after the request for access is received from an employee or designated representative.
 - a. Whenever an employee or designated representative requests a copy of the IIPP, the DFJV will provide the requester a printed copy of the IIPP, unless the employee or designated representative agrees to receive an electronic copy of the IIPP.
2. Provides an electronic copy of the DFJV IIPP within 5 business, in a reasonable time, place, and manner, upon employee's approval to receive the electronic version of the IIPP.
3. The DFJV shall communicate the right and procedure to access the IIPP to all employees.

An employee must provide written authorization to make someone their "designated representative." A recognized or certified collective bargaining agent will be treated automatically as a designated representative for the purpose of access to the company IIPP. The written authorization must include the following information:

- The name and signature of the employee authorizing the designated representative.
- The date of the request.
- The name of the designated representative.
- The date upon which the written authorization will expire (if less than 1 year).

Records will be distributed in hard copy or electronic format according to DFJV's guidelines, and as required by applicable regulatory agencies. Distribution and review of records may also include, but is not limited to:

- Executive personnel of DFJV
- Job site personnel
- Project management
- Safety representatives
- Human resources
- Local, state or federal agency offices
- Insurance providers

Several types of records such as incident reporting and training records may be input into spreadsheets and software databases for future analytical evaluation.

Retention

Records governed by regulatory agencies shall be retained a minimum of five years unless otherwise specified.

Documents not governed by regulatory agencies shall be retained a minimum of at least one year unless otherwise specified.

Incident Reporting and Investigation

Policy

Employees are required to comply with all incident response, reporting and investigation procedures. **Failure to immediately report incidents** to the appropriate supervisor shall result in disciplinary action up to and including termination. DFJV must investigate all incidents to prevent additional occurrences.

This list is not inclusive, but incidents can be any of the following:

- Injury to DFJV employee(s), or subcontractor employee(s),
- Injury to a party not affiliated with the DFJV,
- Any DFJV vehicle or property damage,
- Any vehicle or property damage to a non-DFJV party,
- Any theft of DFJV property, materials, or equipment, or
- Any crisis.

Manager / Supervisor Responsibility

All site managers and supervisors shall ensure workers have been adequately informed and trained about exposure to job hazards and possess an understanding of the steps to take should an incident occur.

Site managers and supervisors shall also ensure the appropriate incident reports are completed by the appropriate people.

Employee Responsibility

All **employees** shall **immediately report** any personal injury incurred during work to their direct supervisor. Failure to report an injury shall result in disciplinary action up to and including termination.

Any injury requiring services from a medical provider will necessitate a drug screening for the injured party and any other employee involved in the incident.

Medical Facilities

All project office locations shall post information, and otherwise communicate the name, address and phone number of approved medical clinics and emergency rooms close to the job site.

Emergency Response Planning

- Ensure that clear and precise directions to the worksite can be provided to emergency responders. The following steps can help keep employees informed:
 - Post project area maps with labeled intersections,
 - Post copies of directions to and from the job site on job boards and/or at the front desk, and
 - Ensure that all employees on site are aware of the postings and understand their importance.

Emergency Response

In the event of an emergency situation:

- **CALL 911**
- For remote locations emergencies may require:
 - Transport of the injured or ill employee to a point where they can be reached by an emergency medical service provider, or
 - Stationing an employee(s) at the nearest easily accessible public intersection to meet emergency responders and lead them to the job site.

Incident Response

In all serious incidents, the following procedures shall be followed:

- If the incident is a **crisis**, initiate the Crisis Management Plan.
- Take care of the injured,
- Protect people and property,
- Notify appropriate family persons and entities, and
- Complete and distribute the appropriate incident report.

Injured Parties

The primary concern for any incident is the care of any injured party. **IMMEDIATELY** contact the appropriate Emergency Medical Services (EMS) System for all serious injuries. Appropriate emergency responders can be reached by dialing **911**.

A serious injury is any injury that will require hospitalization, long term recovery or is life threatening.

Protecting Other People and Property

Cordon off or barricade the site to prevent further injuries, property damage, or unauthorized persons from entering the area. The investigation shall only begin after the incident site has been secured and deemed safe to approach.

Crisis Management Plan

“A crisis is any incident that could focus negative attention on DFJV or **the owner’s group** and have an adverse effect on the DFJV’s overall financial condition, its relationships with key audiences, and/or its reputation within the marketplace.”

If the event is a crisis situation, retrieve the Crisis Management Plan documents and follow the CMP procedures. The local project office will need to distribute the responsibility assignment cards to the appropriate parties. The back of each assignment card contains a list of primary contacts to be notified in the event of a crisis.

Crisis Management Procedures

All managerial and supervisory employees and office personnel on every project shall be made aware of the location of the Crisis Management Plan (CMP) and shall be trained on the contents and procedures of the CMP so they know how to respond shall an incident be a crisis situation.

Project sites are required to keep the contact information in the CMPs up to date. Annually, the information in the plan should be reviewed and updated as conditions warrant.

Notifications

In the case of serious injury to an employee, a subcontractor’s employee, or the public, immediately notify the proper individuals.

Report any fatality **within 8 hours to OSHA**. Serious injury, amputation, loss of consciousness or hospitalization of one or more, must be reported to OSHA **within 24 hours**.

Incident Report

The incident forms listed below may be found in the DFJV office.

- Injury/Non-vehicle Incident form
- Vehicle Incident Form

Initial written reports shall be sent within 48 hours to the appropriate:

- DFJV Deputy and or Operation Manager
- DFJV Project Safety and Security Manager
- Equipment Manager if DFJV vehicles or equipment are involved in the incident.

Additional reports are often necessary to fully identify the contributing factors that resulted in the incident and are outlined in the Follow-up Incident Reporting section that follows. The insurance broker/carrier may have additional forms to be completed.

Reporting Guidelines

All safety representatives, project managers, and field supervisors shall be trained on how to complete “initial” written incident forms, where to distribute completed forms, and what the timeline is for completion of follow-up incident paperwork.

Written incident reports shall consist of only known facts regarding the physical cause of the incident and shall not reference any placement of legal liability regarding any party. No part of the report shall be given to any other party, including the injured employee without project manager approval.

Reporting Timelines

Immediately – send initial reports to the safety manager. All initial written reports shall contain the facts known at present. This includes reports for:

- Recordable and lost time injuries as well as initial reports for any damage to DFJV or third-party equipment, materials or property,
- Anything being reported to an insurance provider, or
- Reports for any incident involving a company vehicle.

Within 48 hours– all follow up information and “root cause” analysis report shall be completed within 48 hours.

Alert Notices

Flash alerts (injury incidents) and other incident alerts are used to raise awareness of potential hazards so corrective measures can be implemented to prevent future incidents similar in nature. Alerts are sent from the safety department within 24 hours of receipt, to area employees of DFJV summarizing incident events. Alert events are sent for any of the following situations:

- Recordable or Lost Time injury incidents
- Near miss/near hit situations
- Equipment or product failures that pose hazards

Alert notices distributed to all employees only outline basic information and do not reveal the names of individuals who may have been injured or at fault in the incident.

Root Cause Analysis

Immediately following a lost time incident, an incident investigation team led by a construction manager shall determine the actual root causes that contributed to the incident and advise of any corrective or disciplinary actions that may have been administered.

Results will be communicated via a Root Cause Analysis report to the proper individuals within 5 days of the incident occurrence.

Incident Reporting

DFJV management, legal, and safety representatives must be notified of all serious incidents immediately following the occurrence. Subsequent written reports shall be forwarded following management review and approval.

The call flow call sequence outlined below shall be used for:

- Recordable incidents
- Lost time incidents,

- Any incident with significant property or liability damage,

Any near miss/near hit situation, where serious bodily injury, significant property damage or liability could have occurred.

Investigation

Depending on the nature and seriousness of an incident, designated company legal counsel representatives and risk mitigation specialists from insurance carriers may be called to the scene to manage an incident investigation.

All field supervisory personnel shall have a basic understanding of investigative techniques and understand the importance of thorough incident documentation.

Conducting the Investigation

While performing an investigation the following procedures shall be followed:

- Make a visual walkthrough of the incident site.
 - Conditions at an incident scene change rapidly. Record the location of all items of evidence as the walk through is made.
- Identify all potential witnesses.
 - Record the names, addresses and phone numbers of all witnesses.
- Examine the evidence.
 - The items that will provide information about what happened, how it happened and why it happened shall be identified and examined.
- Photograph all evidence. Photos taken prior to contact with counsel are open for discovery.
 - Photographs of the general area, major elements of the incident site, and articles of evidence shall be taken of the incident site as soon as possible. Take pictures from different directions and include wide angle and close-up shots whenever possible. Include common objects in the photograph to provide perspective and orientation of the incident scene. Keep a detailed description log of each photograph. Label and file all photographs with brief descriptions. The photographs and log shall sufficiently describe the incident, even when viewed years later by people with no previous knowledge of the incident.
- Make a diagram of the incident scene.
 - A sketch shall be made of the incident scene, showing the locations of all evidence essential to understanding the incident situation. Distances involved shall be measured and recorded on the sketch. At a later time, information from the sketch can be used to prepare a scaled diagram for inclusion in the incident report.
- Interview and obtain statements from all witnesses.
 - Interview and record witness statements with as much detail as possible immediately following the incident.

Substance Abuse Policy

DFJV believes that maintaining a drug and alcohol-free workplace and minimizing highway and work-related accidents are crucial steps to ensuring that employees, contractors, subcontractors, and the families and communities that depend on them, remain safe.

Purpose

The DFJV values its employees and business partners and recognizes the adverse effects that substance abuse – including but not limited to the use of illegal drugs, the abuse of alcohol, the misuse of prescription drugs and over the counter medication – can have on the work environment. Employees who use drugs or abuse alcohol can become less productive, less reliable, and threaten the safety and well-being of not only themselves but also others they work with.

The Substance Abuse Policy is part of an overall commitment to create a safe drug and alcohol-free workplace and address the multiple problems drug and alcohol use can pose. In order to further commit to providing a safe, drug and alcohol-free environment, the DFJV has a drug and alcohol testing program for employees and pre-employment drug testing for applicants. We seek the understanding and cooperation of all employees in implementing this Policy to make our Company a safe and enjoyable place to work.

Applicability

This policy applies to all employees of the DFJV, employees of vendors, subcontractors, independent contractors employed at the DFJV, and applicants who receive an offer of employment. In the event of any material conflict between the terms of the union bargaining agreements and this policy, the terms of the union bargaining agreements will have control. An employee's signature on the employment application consents to the DFJV Drug-Free Workplace and Substance Abuse Policy.

Policy

The DFJV complies with the Drug – Free Workplace Act and employees are expected to comply with the following:

- DFJV maintains a zero tolerance for the use, manufacture, cultivating, sale, distribution, or possession of alcohol, narcotics, illegal drugs, or controlled substances while on the job, DFJV property, or a DFJV jobsite. These behaviors are prohibited and are dischargeable offenses. (Alcohol, narcotics, illegal drugs and controlled substances are hereinafter referred to as “drug” or “drugs”). Any illegal substances found on the jobsite will be turned over to the appropriate law enforcement agency and may result in criminal prosecution.
- Employees are also prohibited from having any such illegal or unauthorized controlled substances in their system and from having excessive amounts of otherwise lawful controlled substance in their systems while at work. An employee demonstrating

impairment that is suspected to be drug-related will be required to submit to testing in conformance with this policy.

- Under the terms of the Drug-Free Workplace Act, an employee must notify the employer within 5 calendar days if she or he is convicted of a criminal drug violation in the workplace.
- Employees who are required to maintain a driver's license as part of their job duties are required to notify Human Resources within 24 hours upon any arrest and/or conviction of any crime involving drugs, including driving under the influence or similar crimes.

Unscheduled work

Employees who are contacted to report to work for unscheduled or emergency reasons must not accept a work assignment if they have reason to believe their ability to work safely and effectively may be impaired by any reason of drug or alcohol use. Any employee contacted to report in such circumstances has a duty to disclose the impairment and refuse the assignment. Employees refusing an unscheduled work assignment on this basis will not generally be subject to discipline for the refusal.

Prescription and Over-the-Counter Medication

Any employee using a prescribed or over-the-counter medication should check with their physician to make certain the medication will not impair their ability to work and to work safely. In circumstances where the use of a prescribed medication or over-the-counter drug is inconsistent with safe or efficient performance of duties, the employee has a duty to inform their supervisor. The supervisor will inform Safety, management, and Human Resources to determine available options and accommodations, if any.

Testing

One of the tools used to support the Policy is drug testing. DFJV recognizes that testing does not necessarily demonstrate impairment, nor does it necessarily reveal a substance abuse problem or chemical dependency. All drugs testing (except alcohol) will be conducted by oral or urinalysis. Michael Kesselman or his designee should be contacted to arrange any clinic/lab testing that is to be performed.

Pre-employment: All potential new-hire applicants who have received a conditional offer of employment will be required to submit to drug testing prior to being hired. DFJV will withdraw the conditional offer of employment for any applicant who fails the drug test or who otherwise does not comply with this policy. The candidate will not be hired and will remain ineligible for employment consideration for a period of one year from the date of the test.

Reasonable Suspicion: An employee may be tested for drugs when DFJV has Reasonable Cause to believe that the employee may be in violation of the Substance Abuse policy.

“Reasonable Cause” testing can be triggered when: (A) There is a reasonable suspicion that the employee may have engaged in drug, alcohol or substance use or appears by observable subjective factors to be impaired. The determination that reasonable suspicion exists must be based on specific, contemporaneous, articulable observations (seen, heard or smelled) concerning the appearance, behavior, speech or body odors of the employee. Two trained supervisory persons concurrently agree on the impairment observation (based on contemporaneous physical, behavioral, or performance factors) and inform local Human Resource representative before Reasonable Cause testing is performed (a Safety representative can qualify as one of the required trained supervisory persons).

or (B) an employee is identified during an internal investigation, based on specific facts and reasonable inferences drawn from such facts, as being in violation of this policy and prior approval is obtained from both a Legal representative and a Human Resources representative.

Reasonable Cause testing will be conducted promptly following an agreement on an impairment observation or following required approval as applicable during an internal investigation. Any employee who leaves the premises while reasonable cause is being determined, or who does not provide a specimen within two hours of being instructed to test, will be considered a refusal to test.

In all cases of Reasonable Cause testing, DFJV will provide transportation to and from the collection/testing site and/or any mutually agreeable location, while impairment is detected.

Notification of Impairment: It shall be the responsibility of each employee who observes or has knowledge of another employee in a condition that impairs the employee in the performance of his or her job duties, or who presents a hazard to the safety and welfare of others, or is otherwise in violation of this policy, to promptly report that fact to his or her immediate supervisor.

Post Accident: When an employee's performance either contributed to an incident/accident or cannot be completely discounted as a contributing factor to the incident, the employee will be required to submit a post-accident drug and alcohol screening immediately.

The following is an inconclusive list of examples of post-accident events –

- Personal Injury or caused injury to another party by vehicle or equipment operation.
- Property or equipment damage incident on site.
- Vehicle incidents/accidents on or off the worksite in a company-controlled vehicle.

Periodic: When the entire employee population is tested. This may occur anytime during the year. Upon review and approval of the Legal and Human Resources department.

Testing Time Frames: Reasonable Cause and Post Incident Testing will be conducted as soon as reasonably practical following the incident.

- No testing for alcohol shall occur more than 8 hours after the time of the incident giving rise to the test.
- In the case of drugs (excluding alcohol), no testing shall occur more than 32 hours after the time of the incident giving rise to the test.

Testing Parameters-

- All drugs tested (except alcohol) will be conducted by oral or urinalysis.
- Alcohol testing will be performed by oral swab or evidential breath test (EBT). If the result of an alcohol screening test is an alcohol concentration of 0.04 or greater (EBT) a confirmation test will be performed.

The confirmation test will generally be done within 15, but not more than 30, minutes of the screening test. The oral swab is a quantitative Lab based test with a screen/confirmation cutoff level of 40 mg/dL.

Procedures

All specimens will be collected in accordance with approved protocols of the U.S. Substance Abuse and Mental Health Services Administration (SAMHSA).

Split Sample Collection: All urine samples, whether collected on-site, via a clinic or a testing service will be split into two samples. In the US, if the POCT (express, quick, or rapid test) sample is negative the split sample may be discarded.

Urine Samples: Urine specimen collection will be done in a private setting without observation by the collector. However, where there is reason to believe that an individual being tested may have altered or substituted a specimen, witnessed collections may be conducted.

Non-negative Test Results: POCT tests are used on the jobsite. A non-negative test means that the screening requirements have not been met and results are inconclusive until reviewed by the Medical Review Officer (MRO). If an employee test result returns an adulterated, dilute, substituted, refused, non-negative, or any other result other than negative, an employee will be re-tested through urinalysis testing at a clinic. In the event of a non-negative result, the collector or collection facility will send the split specimen directly to the certified contracted laboratory which will, in turn, analyze the specimen.

Awaiting Test Results: If an employee is subject to an investigation for reasonable cause testing, the employee will be suspended from work with pay pending the receipt of the test results.

Communicating results: The MRO appointed by the Qualified Program Administrator will review the files of all employees or potential new hires whose drug test results are non-negative. The MRO will review lab results from the split sample and determine if there appears to be any explanation for the non-negative other than substance abuse. The individual being tested may request an opportunity to submit additional medical information for consideration by the MRO. The MRO will confirm final results as either positive or negative.

MRO receives a non-negative test result:

- The MRO will contact the employee or candidate that was tested and determine if there is a valid medical reason for use of the substance in question.
- If no valid reason exists, the MRO will communicate a verified non-negative result to the appropriate Company contact.
- If the Employee has a valid medical reason for using the drug, the MRO will report a verified negative result to the Company.
- If the MRO is unable to get in contact with individual with non-negative result within 24 hours from receipt of results, the MRO will inquire the employer contact the employee and instruct them to contact the MRO. At this point the employee has 72 hours to respond to the MRO. If the employee does not respond and the non-negative cannot be confirmed, the employment will be terminated or withdrawn.

The MRO may verify a test result as non-negative without having communicated directly with the individual tested in three circumstances:

- the individual expressly declines the opportunity to discuss the test.
- after making all reasonable efforts, neither the Company nor the MRO has been able to contact the individual within the timelines outlined in ii above.
- the individual was successfully contacted by the employer (as documented in writing) and instructed to contact the MRO within 3 business days but failed, without reasonable excuse (including a serious illness or injury or other circumstance that made timely contact impossible), to do so.

Following completion of the review process, the MRO will report the test results to the Company in a manner that ensures confidentiality of the information.

Re-employment terms: If the MRO determines a positive test result; The employee or candidate will be terminated and/or not considered for employment for a period of six months.

Rehire Conditions: An employee who has separated employment will be subject to a pre-employment drug screen regardless of the time spent away from the employer upon rehire.

Job shut down: An employee will be subject to drug screen upon returning to work when there has been a job shut down and/or no available work due to inclement weather when surpassing three days.

Refusal, Tampering, and Alteration: An employee's cooperation with such a test is required as a condition of employment. The employee's refusal to cooperate and submit to a drug test, attempt to tamper with, and/or alter the provided sample will be considered as a positive result and will be grounds for termination.

Drugs that May be Tested: The DFJV reserves the right to test for alcohol and for any of the following drugs (subject to applicable state law):

Amphetamine
Methamphetamine
Methadone MDMA
(Ecstasy)
MDA (3,4-Methylenedioxyamphetamine)
MDEA (3,4-Methylenedioxy-N-ethylamphetamine)
Cocaine
Opiates and Heroin
6MAM (6-Monoacetylmorphine)
Morphine
Phencyclidine
(PCP)
Propoxyphene
Marijuana
Benzodiazepine
sBarbiturates

Non- Discrimination

In accordance with any applicable federal, state, and/or local law, the DFJV does not discriminate against any qualified individuals with a disability who are not currently using illegal drugs and who have either successfully been rehabilitate or who may be currently participating in a supervised rehabilitation program and are no longer using illegal drugs. A current disability of any kind, however, does not entitle an employee or job applicant to violate any provisions of this policy.

Accommodation

- DFJV recognizes that employees can suffer from disabilities or from drug and alcohol addiction and dependency. DFJV encourages any employee to seek professional care and counseling before the employees tests positive for drugs in violation of this policy. Any employee who requests reasonable accommodation to perform the essential functions of their job as a result of a disability must contact Human Resources. A current disability of any kind, however, does not entitle an employee or job applicant to violate any provisions of this policy.
- Employees who decide to self-declare and voluntarily participate in a treatment program may be granted leave to do so with a conditional right to return to work dependent upon the employee's successful completion of the appropriate regimen as determined by a

Substance Abuse Professional (SAP).

Protection of Privacy

- All results will be housed on DFJV's secure website - Foley. Only the appropriate designated company contacts will have access to results. The information will be safeguarded against unauthorized use or disclosure in accordance with the Company's Privacy Policy and applicable Privacy legislation.
- Human Resources will keep all records including the "Custody and Control" form concerning Drug tests in a separate employee confidential file.
- Results may only be used or disclosed to third parties without the individual's consent in cases

where such information is needed to:

- Ensure the safety or health of the individual or others,
- The individual cannot be timely located,
- Disclosure is required by law, or
- The proposed use or disclosure is otherwise exempt from the requirement of consent under applicable Privacy legislation.

Violations

Employees who violate this policy will be subject to discipline, up to and including termination from employment. The provisions of this policy supersede all other company mandates or procedures related to substance abuse.

Shared Responsibility

Each Company, contractor and employee covered by this policy shares a legal and moral duty under the DFJV policies and procedures and all applicable occupational safety and health legislation to ensure its successful policy implementation for the safety and wellbeing of all. This includes a duty to identify and report all safety issues and breaches of the Substance Abuse Policy to the appropriate Company representatives. Supervisors shall ensure effective implementation of this policy.

Employer

An employer is required by law to provide a safe workplace and safe systems of work, which includes the elimination of known hazards in the workplace. Part of that duty of care includes taking reasonable precautions to ensure that all Employees on DFJV property are in a fit condition to work so as to minimize risks both to themselves and others.

All Employees

Employees are expected to report dangerous and questionable behavior, notify supervisor of any actual or potential fit for duty impairment, and comply with all provisions of the Substance Abuse Policy.

Senior Management

The senior management of the DFJV shall be responsible for ensuring the adoption and implementation of this policy by:

- Ensuring frontline managers or supervisors and any contractors they may oversee or audit, understand and support this policy in all their areas of responsibility.
- Ensuring adequate resources are allocated to fund the education, training, counseling, and other policy requirements.

Definitions

The following words and phrases, when used throughout this policy, convey the following meanings detailed below:

- “Drug(s)” includes: (1) illegal controlled substances (illegal drugs or other controlled substances as defined under the more restrictive of state or federal laws, including narcotic and non-narcotic drugs, and prescription drugs used without a valid prescription or contrary to the prescription’s directions); (2) non-controlled (over-the-counter) substances, the use or abuse of which has the potential to change or adversely affect a person’s physiological and/or psychological state potentially inhibiting a person’s ability to perform their job safely or productively; (3) any substance used or abused for the purpose of achieving a drug-like effect, including medicinal or recreational marijuana; and (4) alcohol.
- Drug and Alcohol “use”: means consuming, possessing, selling, transferring, concealing, distributing or arranging to buy or sell, being under the influence, or reporting for duty under the influence of alcohol or Drugs to any degree, or having illegal drugs in one’s possession or system.
- DFJV Business: Refers, without limitation, to all activities undertaken by employees and by contractors and their employees in the course of the DFJV’s operations, whether conducted on or off DFJV property.
- DFJV Property: Means any land, building, worksite or part thereof owned, leased or occupied by DFJV and any motor vehicle, piece of equipment, container or other means of transportation (collectively, “vehicle”), owned, leased, rented or used by DFJV and any private vehicle used in the course of DFJV Business.
- Company Driver: Includes those Employees and contractor Employees whose duties involve driving a Company vehicle (as defined under “Company property”).
- Employee: Means any person employed by DFJV or by a contractor working for DFJV (on or off company property), whether in a full or part time position and includes office, supervisory, and managerial staff as well as craft or field workers.

- **Fitness for Duty:** Means a physical, mental or emotional state, which allows an individual to perform assigned tasks in a competent manner without compromising or threatening the safety or health of themselves or others. Final determination of what constitutes "Fit for Duty" for any specific task will lie in the sole discretion of the principal employer, manager or supervisor as defined by policy guidelines or other available assessment procedures as applicable and appropriate.
- **Incident:** Means an event which intentionally or unintentionally causes or could have caused (a near hit/miss), injury or damage.

Medical Review Officer ("MRO"): A medical doctor who has been trained and certified in the interpretation and reporting of human drug testing specimens to determine the abuse of substances.

- **Negative Test** - This is a test result that has passed the criteria set by the DOT.
- **Non-Negative Test** – Until results are reviewed by an MRO the screening requirements have not been satisfied and the test is considered inconclusive. Upon review the MRO will confirm either a negative or positive result.
- **On-the-job:** Means anytime that an individual is engaged in DFJV Business, while on DFJV property, whether on or off duty at the time.
- **POCT:** This acronym refers to "Point of Collection Test". All POCT collections will be split samples so that immediate negative results can be determined. Tests are often called quick tests, instant tests, rapid response tests, or express tests to name a few.
- **Positive Test** – A confirmed test result that fails to meet screening requirements.
- **Current employees with a positive result** will be terminated and are ineligible for rehire consideration for a period of six months from the collection date of the positive sample.
- **New hire candidates with a positive test** are ineligible for hiring consideration for six months from the collection date of the positive sample.
- **Post-Incident Test:** Required drug test following an event which intentionally or unintentionally causes or could have caused (a near hit/miss), injury or damage.
- **Substance Abuse Professional ("SAP"):** An SAP is responsible for assisting with the coordination to overcome such problem by enrolling in a Union sponsored rehabilitation program. The SAP coordinates with the representative union of said employee and monitors the progress of any individual who participates in a rehabilitation program. SAP is Human Resources.

Subcontractors / Independent Contractors

All independent contractors (this term includes anyone who operates on, or works with any DFJV property under contract to DFJV) will be expected to:

- Work with DFJV to ensure the successful implementation of the Program in respect of all services and work being performed by the independent contractor and its Employees;
- Perform all contracted work and services in a safe manner consistent with established DFJV practices, standards, policies and this Program;
- Read, understand and abide by this Program implementing all duties and responsibilities accorded an employer hereunder;

Agreement to this policy is implicit upon signing an Independent Contractors Service Agreement.

- Where required by law or necessity of DFJV, implement a similar program for all employees when they are traveling to or from and anytime they are on DFJV property;
- Ensure that all employees are aware of and agree to submit to testing for drugs as set out in this Program or a comparable program.
- Ensure that all employees attend for any and all scheduled and unscheduled work "Fit for Duty";
- Encourage all employees to self-declare, seek advice and follow appropriate treatment programs for substance dependency or an emerging drug problem;
- Ensure all Employees abstain from the manufacture, transportation, possession or use of drugs while traveling to or from and when on DFJV property;
- Cooperate with the recommendations of any health care professional;
- Assess the potential for impairment during working hours that could be caused by the legitimate use of medication, and manage the risk;
- Encourage reporting the use of any medication that could have a negative effect on employee performance to the appropriate DFJV liaison.
- Observe the "Fit for Duty" conditions of others on DFJV property and take appropriate action if safety issues are a concern.

Violation of or failure to perform any of the preceding requirements may result in termination of the agreed services.

Client Requested Testing/Pre-Site Access Testing

From time to time, it may be necessary for DFJV to meet a client or customer's Drug testing requirements (which may differ from those outlined in this Program) in order to qualify for work on a project or to access a work site.

Prior to agreeing to do so, DFJV will seek legal input regarding the propriety of such requirements and the adequacy of privacy protections accorded DFJV Employees who will be assigned to the project.

New Project Site Clinic Set-Up

Once a medical facility or clinic has been identified as the project's workers' compensation injury provider, the clinic address and contact information need to be provided to AIG. AIG will contact the clinic directly to establish a procedural workflow so that collection samples and paperwork are routed correctly.

Assistance with AIG clinic set-up can be provided by Corporate Safety.

When advising a direct supervisor of results for an employee who was tested, the only information that can be conveyed is:

Results are inconclusive until the MRO review has been completed.

Any such breach of confidentiality could result in litigation and have serious ramifications for the Company

Hazard Assessment and Planning

Planning Procedures

All projects shall employ the best safe work practices possible to ensure company and subcontractor employees remain injury free. DFJV and project property, materials and equipment shall be protected from damage and maintained in good condition. Planning is an essential component of safety on the jobsite. All projects shall fully utilize Standard Operating Procedure (SOP) guidelines, create site specific Job hazard Analysis (JHA) plans, and ensure Daily Risk Assessment (DRA) forms are utilized to educate employees and enable them to eliminate or prevent potential hazards.

SOP/JHA/DRA Process

This procedure is designed primarily for managers and supervisors to better facilitate safety planning into project work. Managers and supervisors are required to use applicable Standard Operating Procedures as a guide when developing Site Specific Job Hazard Analyses, which in turn are used to assist in the creation of Daily Risk Assessments.

Scope

These risk assessment planning procedures are mandatory. Anytime a new operation begins, a “site specific” Job Hazard Analysis shall be written to aid the development of effective Daily Risk Assessments. Applicable SOPs can be resources for developing JHAs.

Definitions

Daily Risk Assessment (DRA) - a mechanism used by the crew to identify and discuss hazards associated with daily tasks or changes in operation, prior to starting the task. The DRA should identify daily site-specific hazards, corrective actions, additional tool requirements, and changes in the condition or the process.

Job Hazard Analysis (JHA) - a planning technique for job tasks that identifies hazards before they occur. JHAs focus on the relationship of the worker, the task, the tools, and the work environment. As hazards are identified, steps are taken to eliminate or reduce hazards to an acceptable risk level.

Standard Operation Procedure (SOP) – designed to focus on repetitive operations that occur throughout the company. SOPs are intended to be resources rather than mandatory protocols. SOPs are a set of instructions covering operation features that lend themselves to standardized procedures without loss of efficiency or effectiveness. SOPs are located in the DFJV Site Specific Health and Safety Plan (HASP).

Responsibilities

- Construction Managers/Segment Management has full responsibility for establishing the timeline for completing JHAs and for finalizing, implementing, and executing an effective program of personal protection and incident prevention of the job site.
- Superintendents are responsible for the day-to-day implementation of the safety and health program by ensuring all operations are properly planned using SOPs, JHAs, and DRAs and for implementation of corrective actions as needed.
- Engineers incorporate safety mechanisms into all temporary works, rigging devices, and review designs to ensure all safety standards and regulations are adequately met.
- Safety Representatives serve as technical advisors to supervision about safety planning, problems and challenges.

Injury Illness Prevention Plan (IIPP)



- Foremen are responsible for implementing the Safety -IIPP program and execution of the DRA for each crew under their supervision.

Procedures

- Before the operation begins, the superintendent, engineer, and safety representative meet to review the task and write the site-specific JHA.
 - If an SOP is not available, proceed to develop the site-specific JHA.
- Site Specific Job Hazard Analysis
 - JHAs are written utilizing the SOP
 - The superintendent will work with the engineer and field safety representative to review the SOP and incorporate site-specific activities, additional tasks, hazards, and corrective measures. If needed, some steps from the SOP may be omitted, to tailor the JHA for the specific task or operation.
 - Following the initial operation, and as often as needed, JHAs shall be reviewed by the superintendent, engineer and safety representative to verify that all vital steps are included, all hazards are identified, and that all corrective measures are implemented.
 - Any needed revisions shall be made to the JHA before works starts on the specific operation.
 - The foreman will discuss the JHA with the crew before an operation begins and will ask for additional comments for the JHA and make revisions if needed.
- Daily Risk Assessments
 - The foreman assigned to the task being completed for the day writes the Daily Risk Assessment using the JHA as reference.
 - The foreman shall discuss the tasks performed for the day with his crew to determine if any additional hazards and corrective measures are needed.

Hazard Correction

Don't Walk By

Each employee shall alert his/her supervisor about any unsafe conditions or acts witnessed in the workplace without fear of reprisal. This includes reporting any near miss or near hit incidents so that a root cause analysis, and flash or incident alerts can be completed and distributed to all sites for corrective actions, educational and training purposes.

Specific incident reporting and investigative procedures are detailed in the Incident Response, Reporting & Investigation section of the company IIPP.

Site Safety Inspections (SSI)

Evaluating job site conditions is a continuous responsibility for project/deputy/operations/segment/construction managers, superintendents, foremen, and safety representatives, in order to document and correct deficiencies.

SSI written documentation copies shall be forwarded to corporate and project safety for the master tracking file. Audit participation is also documented in monthly summary reports.

The frequency schedule for conducting site safety inspections listed below shall be followed:

- Superintendents
 - Complete at least two documented SSI per month.
- Segment Safety Managers & Specialists
 - Assist with and complete at least one SSI per week for their segment.
- Segment/Construction Managers
 - Conduct at least two SSI per month.
- Project Safety Manager
 - Schedule and complete at least one SSI per week.
- Deputy Project Manager/Operations Managers
 - Schedule and complete at least two SSI per quarter.
- Project Director
 - Schedule and complete at least one SSI per quarter.

Hazard Communication

This written Hazard Communication Program defines how company procedures meet the federal, state, and local rules and regulations governing hazardous chemicals in the workplace and explains how employees will be trained and kept informed about possible chemical exposures. This plan dictates:

- How chemicals in use shall be inventoried;
- How safety data sheets (SDS) may be obtained;
- How labels on chemical substances and chemical substance containers must be maintained;
- That employees shall be trained about the hazards of chemicals likely to be encountered on the job; and
- Methods that can be used to protect employees from exposure.

Each operation shall follow this program. Employees, their designated representatives and officials of government regulatory agencies shall be provided copies of this program upon request.

Any information required as part of our hazard communications efforts, such as safety data sheets, is available to employees upon request as is their right.

Multiple Contractors in Area

When multiple contractors and subcontractors are working in the same area, each entity is required by law to furnish one another with copies of related SDS documents and an identifying list of all chemicals in the area and their location.

Compliance Responsibility

The project/Segment manager has the overall responsibility for hazard communication, compliance, and may delegate on-site responsibility to a designee, who is identified as the Hazard Communication Administrator (HazCom Admin). The HazCom Administrator's name and phone number must be provided

during onsite hazard training at each location. These contact names must also be provided in new hire orientations.

HazCom Admin

The HazCom Admin and/or segment safety manager is designated by the project manager and is someone who has been trained on all aspects of the company hazard communication plan, is familiar with all relevant rules and regulations and takes ownership of all assigned responsibilities outlined in this plan.

Chemical Substance Inventory

Periodic inventories shall be conducted to determine what chemical products are present and to identify potential hazards of such substances.

A master list of all chemicals needs to be compiled from the inventory. If uncertain about the qualities of a chemical substance assume it is hazardous until proven otherwise.

A copy of the master list and any new chemicals from subsequent inventories shall be forwarded to the safety department to be included in the online database.

Acquiring Safety Data Sheets

The HazCom Admin at the project location is responsible for maintaining SDS information obtained from suppliers and subcontractors. Any department receiving an SDS must forward the document to the appropriate HazCom Admin and/or safety department.

The HazCom Admin shall:

- Contact suppliers for missing SDS information;
- Obtain the SDS by accessing the online site;
- Verify that SDS files are current;
- Maintain a master list of chemicals for the site

Chemical Substance Purchases

- Approval from the work site's designated HazCom Admin and environmental is required prior to the purchase of any new hazardous chemical substances and before bringing a new substance on site.
- DFJV policy prohibits purchasing hazardous chemical products from any supplier that does not provide the appropriate SDS information in a timely fashion.
- Any department receiving an SDS shall forward it to the HazCom Admin and environmental for document control action.

Labels, Labeling, and Warnings

The HazCom Admin at the project location must ensure that appropriate labels are present on all hazardous chemicals and must verify the label identifying information and other data corresponds to the SDS document.

Label Procedures

- Damaged labels or labels lacking needed information shall be replaced or corrected immediately. The HazCom Admin shall approve any in-house labels in use.

- The HazCom Admin shall perform regular reviews of all chemical containers to ensure that substances have labels, and that labels are up to date.
- Regulations and company policy prohibit removing, altering, or defacing the label on any hazardous chemical container.
- Labels, tags or markings on each container shall:
 - Identify the hazardous chemical(s) as listed on the SDS.
 - Provide appropriate warnings so employees can protect themselves from the substance hazards.
 - Shall list the name and address of the manufacturer, Location of the SDS shall be known, or identify the responsible party to contact, for additional information about the specific chemical.

Hazardous Material Label Identifiers



Training Requirements

Employees of each contractor or subcontractor, from upper management to craft workers, who work with or may be exposed to hazardous chemicals, shall be trained on:

- The safe use of hazardous chemical substances, and
- Hazard communication procedures.

DFJV shall conduct formal GHS training with participation from line supervisors. The project managers or supervisors shall ensure hazardous substance and communication training takes place at the appropriate time for employees who may encounter exposure.

Subsequent training shall be provided whenever a new hazardous chemical is introduced into the workplace. Line supervisors shall conduct supplementary training on a regular basis, as a way of reinforcing the importance of handling hazardous chemicals properly.

Training shall be recorded and documented and shall include the signature of each employee who received training.

Training Elements:

At a minimum, the hazard communication training shall include:

- Requirements of the hazard communication standards,
- Review of an SDS sheet,
- A description of content and location of the written program,
- Awareness of specific chemicals that are present in the work area,
- Operational requirements for identifying hazardous chemicals on project JHAs,
- How to detect the presence or release of hazardous chemicals, by:
 - Appearance,

- Odor, and
 - Through the use of monitoring devices.
- The physical and health hazards of chemicals in the work place,
- How to protect employees from chemical hazards including:
 - Engineering controls,
 - Administrative controls,
 - Appropriate personal protective equipment ,
 - Proper work methods, and
 - Emergency procedures.
- Operational procedures of this program, including the names of those in charge, the meaning and use of labels, and where to find safety data sheets, and
- Information about the employee's rights and responsibilities under the program standards and on how to obtain and use related information about chemical substances.

General Project Safety Requirements

First Aid

Project management is responsible for providing adequate facilities and/or facilities to ensure prompt and efficient first aid and emergency care of injured or sick employees.

- First aid station will be established as needed. These stations will be properly identified with signage
- All company vehicles will be equipped with a first aid kit
- Designated supervisors will be trained and certified or hold valid certificate in first aid and CPR

Health and Sanitation

- Drinking water shall be made available from suitable sources.
- Drinking water containers shall be labeled as such and cleaned regularly
- Non potable water shall be labeled as such
- Single service cups are to be used
- Toilet facilities shall be provided and kept within reasonable proximity to employees work locations. These facilities shall be maintained and cleaned on a regular basis.

Housekeeping

- All places of access shall be kept free of obstructions at all times.
- General waste (scrap and lumber) will be cleared from work areas daily.
- Nails are to be removed from lumber at the time of stripping.
- Garbage shall be disposed of in designated trash receptacles.
- Materials shall be stacked in safe stockpiles to prevent collapse or falling.

Fire Protection and Prevention

- Hot work permits will be required on this project by all contractors.
- All company vehicles will be equipped with a 2.5lb minimum ABC fire extinguisher.

Personal Protective Equipment

- Hard hats are required at all times
- Eye protection is required at all times
- Hearing protection required when exposed to high noise levels
- Gloves are required at all times (refer to policies and procedure document to determine type of glove for operation).
- Chaps are mandatory when operating a chainsaw.
- Cutting goggles must be worn when using a torch

Outdoors:

Identification of Potential Flooding Risks: it is important to identify the areas in the field that are at risk for flooding. These areas should be identified, and employees should be made aware of them. Heavy equipment and materials should be stored on higher ground.

Early Warning System: Listen to The Emergency Alert System (EAS), NOAA Weather Radio or local alerting system for current emergency information.

Evacuation Procedures in the Event of Flood: it is important to evacuate the area quickly and safely. The evacuation procedure should include the following steps:

- Designate an assembly area that is in a safe area away from the flood zone.
- Conduct a headcount of all employees to ensure everyone is accounted for and safe.
- If safe, move mechanical equipment out of the potential flood zone to prevent damage.

Training is Important to provide training to all employees on how to respond in the event of a flood. This training should include the following topics:

- How to recognize a flood warning and the importance of taking it seriously. (Who is responsible for making the decision to evacuate)
- Evacuation procedures and designated assembly areas.
- How to safely shut down electrical equipment.
- How to properly use emergency supplies.
- Correct Personal Protective Equipment needed

Inspecting the Jobsite After Heavy Rain or Flood: During heavy rain or flooding there may be areas that experience heavy erosion to the soil including slopes and roadways. Along with erosion construction materials

may have been submerged in water creating hazards. In addition, falsework that was submerged in water needs to be inspected to ensure structural integrity.

-
- Conduct a Site Safety Hazard Assessment of the work area.
- Wear proper PPE including but not limited to, correct glove for the job (may need chemical resistant glove), work boots (if there is standing water wear rain boots), waders or a Tyvek suit may be needed.
- Identify roadways and walkways with erosion and barricade them until they can be repaired.
- Identify the Competent person to inspect all falsework affected by flood or heavy rain.
- If equipment or material had been submerged for some time take proper precautions if mold is suspected to be present.
- Any heavy equipment that was submerged should be inspected by a mechanic prior to operating, inspection to include but not limited to the electrical system.

CUTTING TORCH PPE REQUIREMENTS

Cutting Torch PPE's				
Task	Hazard	Corrective Action	Specific Solution	
hot materials	burns to hands	Correct Gloves for the task of operating a torch	Leather Gloves	
	Exposure to liquid metals	Correct Gloves for the task of operating a torch. If workers below the cutting area move the affected workers or reschedule the cutting to a time that doesn't conflict with other craft.	Leather Gloves	
	Clothing catches on fire	Wear at minimum 100% cotton shirt and pants. Shirt should be long sleeved shirt. Do not wear common synthetics that could melt to you if heated. Remove the reflective vest during cutting with a torch.	100% cotton or better	
	Hot metal, heavy pieces of metal, objects falling on feet	Steel Toed, Leather footwear, with a sole.	Shoes: Steel Toed, Leather, with a sole	
Radiation	Eye Injury	Wear appropriate eye protection to prevent eye injury	Light oxygen cutting = lens 3; Moderate oxygen cutting = Lens 4; Heavy oxygen cutting = Lens 5	

Workplace Security

Dragados Flatiron JV (DFJV) IIP Program for Workplace Security addresses the hazards known to be associated with the three major types of workplace violence. Type I workplace violence involves a violent act by an assailant with no legitimate relationship to the workplace who enters the workplace to commit a robbery or other criminal act. Type II involves a violent act or threat of violence by a recipient of a service provided by our establishment, such as a client, patient, customer, passenger or a criminal suspect or prisoner. Type III involves a violent act or threat of violence by a current or former worker, supervisor or manager, or another person who has some employment-related involvement with our establishment, such as a worker's spouse or lover, and worker's relative or friend, or another person who has a dispute with one of our workers.

Responsibility

We have decided to assign the DFJV Safety and Security Manager with the responsibility for security in our workplace. The IIP Program administrator for workplace security is Heather Simmons and she has the authority and responsibility for implementing the provisions of this program for Dragados Flatiron JV.

All managers and supervisors are responsible for implementing and maintaining this IIP Program in their work areas and for answering worker questions about the IIP Program. A copy of this IIP Program is available from each manager and supervisor.

COMPLIANCE

We have established the following policy to ensure compliance with our rules on workplace security.

Management of our establishment is committed to ensuring that all safety and health policies and procedures involving workplace security are clearly communicated and understood by all workers.

All workers are responsible for using safe work practices, for following all directives, policies, and procedures, and for assisting in maintaining a safe and secure work environment. Our system of ensuring that all workers, including supervisors and managers, comply with work practices that are designed to make the workplace more secure, and do not engage in threats or physical actions which create a security hazard for others in the workplace, include:

1. Informing workers, supervisors, and managers of the provisions of our IIP Program for Workplace Security.
2. Evaluating the performance of all workers in complying with our establishment's workplace security measures.
3. Recognizing workers who perform work practices which promote security in the workplace.
4. Providing training and/or counseling to workers whose performance is deficient in complying with work practices designed to ensure workplace security.

5. Disciplining workers for failure to comply with workplace security practices.
6. The following practices that ensure worker compliance with workplace security directives, policies, and procedures:

Report all near miss/good catch incidents and share a lesson learned throughout the project.

Communication

At our establishment, we recognize that to maintain a safe, healthy, and secure workplace we must have open, two-way communication between all workers, including managers and supervisors, on all workplace safety, health, and security issues. Our establishment has a communication system designed to encourage a continuous flow of safety, health and security information between management and our workers without fear of reprisal and in a form that is readily understandable. Our communication system consists of the following checked items:

- New worker orientation on our establishment's workplace security policies, procedures, and work practices.
- Periodic review of our IIP Program for Workplace Security with all personnel.
- Training programs designed to address specific aspects of workplace security unique to our establishment.
- Regularly scheduled safety meetings with all personnel that include workplace security discussions.
- A system to ensure that all workers, including managers and supervisors, understand the workplace security policies.
- Posted or distributed workplace security information.
- A system for workers to inform management about workplace security hazards or threats of violence.
- Procedures for protecting workers who report threats from retaliation by the person making the threats.
- Addressing security issues at our workplace security team meetings.
- Our establishment communicates with and instructs workers orally about general safe work practices with respect to workplace security.

Hazard Assessment

We will be performing workplace hazard assessment for workplace security in the form of periodic inspections. Periodic inspections to identify and evaluate workplace security hazards and threats of workplace violence are performed by the following observer(s) in the following areas of our workplace:

Injury Illness Prevention Plan (IIPP)



Observer	Area
Mike Storie	Segment 1
Mike Simpson	Segment 2/Precast
Juan Cisneros	Segment 2A
Andrew Giurlani	Segment 3

Periodic inspections are performed according to the following schedule:

1. Weekly in frequency at a minimum.
2. When we initially established our IIP Program for Workplace Security.
3. When new, previously unidentified security hazards are recognized.
4. When occupational injuries or threats of injury occur; and
5. Whenever workplace security conditions warrant an inspection.

Periodic inspections for security hazards consist of identification and evaluation of workplace security hazards and changes in worker work practices and may require assessing for more than one type of workplace violence. Our establishment performs inspections for each type of workplace violence by using the methods specified below to identify and evaluate workplace security hazards.

Inspections for Type I workplace security hazards include assessing:

1. The exterior and interior of the workplace for its attractiveness to robbers.
2. The need for security surveillance measures, such as mirrors or cameras.
3. Procedures for worker response during a robbery or other criminal act.
4. Procedures for reporting suspicious persons or activities.
5. Posting of emergency telephone numbers for law enforcement, fire, and medical services where workers have access to a telephone with an outside line.

Inspections for Type II workplace security hazards include assessing:

1. Access to, and freedom of movement within, the workplace.
2. Adequacy of workplace security systems, such as door locks, security windows, physical barriers, and restraint systems.
3. Frequency and severity of threatening or hostile situations that may lead to violent acts by persons who are service recipients of our establishment.
4. Worker's skill in safely handling threatening or hostile service recipients.

5. Effectiveness of systems and procedures to warn others of a security danger or to summon assistance, e.g., alarms or panic buttons.
6. The use of work practices such as "buddy" systems for specified emergency events.
7. The availability of worker escape routes.

Inspections for Type III workplace security hazards include assessing:

1. How well our establishment's anti-violence policy has been communicated to workers, supervisors, or managers.
2. Our workers', supervisors', and managers' knowledge of the warning signs of potential workplace violence.
3. Access to, and freedom of movement within, the workplace by non-workers, including recently discharged workers or persons with whom one of our worker's is having a dispute.
4. Frequency and severity of worker reports of threats of physical or verbal abuse by managers, supervisors, or other workers.
5. Any prior violent acts, threats of physical violence, verbal abuse, property damage or other signs of strain or pressure in the workplace.
6. Worker disciplinary and discharge procedures.

Incident Investigations

We have established the following policy for investigating incidents of workplace violence.

Our procedures for investigating incidents of workplace violence, which includes threats and physical injury, include:

1. Reviewing all previous incidents.
2. Visiting the scene of an incident as soon as possible.
3. Interviewing threatened or injured workers and witnesses.
4. Examining the workplace for security risk factors associated with the incident, including any previous reports of inappropriate behavior by the perpetrator.
5. Determining the cause of the incident.
6. Taking corrective action to prevent the incident from recurring.
7. Recording the findings and corrective actions taken.

Hazard Correction

Hazards which threaten the security of workers shall be corrected in a timely manner based on severity when they are first observed or discovered.

Corrective measures for Type I workplace security hazards can include:

1. Making the workplace unattractive to thieves.
2. Utilizing surveillance measures, such as cameras or mirrors, to provide information as to what is going on outside and inside the workplace.
3. Procedures for the reporting suspicious persons or activities.
4. Posting of emergency telephone numbers for law enforcement, fire, and medical services where workers have access to a telephone with an outside line.
5. Limiting the amount of cash on hand.
6. Worker, supervisor, and management training on emergency action procedures.

Corrective measures for Type II workplace security hazards include:

1. Controlling access to the workplace and freedom of movement within it, consistent with business necessity.
2. Ensuring the adequacy of workplace security systems, such as security card entry door locks, security windows, physical barriers, and restraint systems.
3. Providing worker training in recognizing and handling threatening or hostile situations that may lead to violent acts by persons who are service recipients of our establishment.
4. Placing effective systems to warn others of a security danger or to summon assistance, e.g., alarms or panic buttons.
5. Ensuring adequate worker escape routes.

Corrective measures for Type III workplace security hazards include:

1. Effectively communicating our establishment's anti-violence policy to all workers, supervisors, or managers.
2. Increasing awareness by workers, supervisors, and managers of the warning signs of potential workplace violence.
3. Controlling access to, and freedom of movement within, the workplace by non-workers, including recently discharged workers or persons with whom one of our worker's is having a dispute.
4. Providing counseling to workers, supervisors or managers who exhibit behavior that represents strain or pressure which may lead to physical or verbal abuse of co-workers.
5. Ensure that all reports of violent acts, threats of physical violence, verbal abuse, property damage or other signs of strain or pressure in the workplace are handled effectively by management and that the person making the report is not subject to retaliation by the person making the threat.
6. Ensure that worker disciplinary and discharge procedures address the potential for workplace violence.

Training and Instruction

We have established the following policy on training all workers with respect to workplace security.

All workers, including managers and supervisors, shall have training and instruction on general and job-specific workplace security practices. Training and instruction shall be provided when the IIP Program for Workplace Security is first established and periodically thereafter. Training shall also be provided to all new workers and to other workers for whom training has not previously been provided and to all workers, supervisors and managers given new job assignments for which specific workplace security training for that job assignment has not previously been provided. Additional training and instruction will be provided to all personnel whenever the employer is made aware of new or previously unrecognized security hazards.

General workplace security training and instruction includes, but is not limited to, the following:

1. Explanation of the IIP Program for Workplace Security including measures for reporting any violent acts or threats of violence.
2. Recognition of workplace security hazards including the risk factors associated with the three types of workplace violence.
3. Measures to prevent workplace violence, including procedures for reporting workplace security hazards or threats to managers and supervisors.
4. Ways to defuse hostile or threatening situations.
5. Measures to summon others for assistance.
6. Worker routes of escape.
7. Notification of law enforcement authorities when a criminal act may have occurred.
8. Emergency medical care provided in the event of any violent act upon a worker.
9. Post-event trauma counseling for those workers desiring such assistance.

In addition, we provide specific instructions to all workers regarding workplace security hazards unique to their job assignment, to the extent that such information was not already covered in other training.

We have chosen the following checked items for Type I training and instruction for managers, supervisors, and workers:

- ✓ Crime awareness.
- ✓ Location and operation of alarm systems as applicable.
- ✓ Communication procedures reporting suspicious persons or activities.
- ✓ Proper work practices for specific workplace activities, occupations, or assignments, such as night work, receptionist, etc.

Injury Illness Prevention Plan (IIPP)



We have chosen the following checked items for Type II training and instruction for managers, supervisors, and workers:

- ☒ Dealing with angry, hostile, or threatening individuals.
- ☒ Location, operation, care, and maintenance of alarm systems and other protective devices.
- ☒ Communication procedures.
- ☒ Awareness of indicators that lead to violent acts by service recipients.
- ☒ Security Card entry "piggybacking" by unauthorized person.

We have chosen the following checked items for Type III training and instruction for managers, supervisors, and workers:

- ☒ Preemployment screening practices.
- ☒ Worker Assistance Programs.
- ☒ Awareness of situational indicators that lead to violent acts.
- ☒ Managing with respect and consideration for worker well-being.
- ☒ Review of anti-violence policy and procedures.
- ☒ Return of all security sensitive items by employee when terminating employment with project.